**DATA REQUEST**

In response to a TURN data request in A.19-03-002 (TURN-SDGE-01, Q25, quoted below), SDG&E responded (quoted in part, below, on November 19, 2019:

25. In the Company’s May 23rd workshop, on the slide labeled “Step 2 – Effective Demand Factors”, the Company describes in the first bullet point identifying max hourly demands for each individual customer for each customer class. Please explain how this works for a group of four residential customers that are all situated on the same substation, and, for instance on a hot day, all their air conditioners are running, but only for 15 minutes at a time, each at a different quarter of the hour, driving each of their max hourly demands in a different quarter of the hour. Would the Company sum the four customers’ peak demands for that hour?

**SDG&E Response:** The decision to use hourly data to build EDFs was made because hourly data is available for all of SDG&E’s customers, whereas 15-minute data is only available for all Non-Residential customers and a subset of Residential customers. **Because EDFs were developed on a customer class basis, no results would be derived on a small group of customers, as our classes have at least thousands of customers in each class.** It must be noted that kWh, by definition, is the average demand (kW) over the hour period. *(response continues…; emphasis added by SDAP)*

**Q1. Would it be correct, in light of the above SDG&E response to TURN’s data request, to apply SDG&E’s class-level EDFs to calculate a marginal cost price floor for an individual customer or use case? Please explain why or why not.**

**SDG&E Response:**

Yes. As stated in response to Question 25 of the TURN-SDG&E-01 data request you referenced, Effective Demand Factors (“EDFs”) are developed on a customer class basis because the EDFs are used to calculate marginal distribution demand costs for customer classes. For this reason, the appropriate EDF to use in the development of the marginal distribution cost price floor for an individual customer would be the EDF developed for the customer class that the individual customer is in.