SIERRA CLUB DATA REQUEST – SDG&E RESPONSE Data Request #01 ESIDENTIAL UNTIERED ELECTRIFICATION RATE - A.21-

SDG&E RESIDENTIAL UNTIERED ELECTRIFICATION RATE - A.21-09-001 DATE RECEIVED: October 25, 2021 DATE RESPONDED: November 8, 2021

General Objections:

SDG&E objects to the definitions and instructions included in this data request on the grounds that they are overbroad, unduly burdensome, and seek information that is irrelevant to the subject matter involved in the pending proceeding and/or not reasonably calculated to lead to the discovery of admissible evidence, and therefore, beyond the requirements of CPUC Rule of Practice and Procedure 10.1. SDG&E also notes that special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

1. Please indicate which climate zone in SDG&E's service territory is considered "representative" of the service territory. To the extent that SDG&E considers all climate zones in its service territory "representative," please indicate the two climate zones serving the most residential customers.

SDG&E Response:

SDG&E does consider all 4 of its climate zones representative, as they represent areas within SDG&E's service territory which have different weather patterns and thus customers who consume energy differently. SDG&E's Coastal and Inland climate zones serve the most residential customers.

2. Please provide 2020 hourly load profiles for residential customers in the climate zone or zones determined in Question 1. Please provide these profiles separately for single-family and multi-family customers.

SDG&E Response:

Please see the attached file titled "Sierra Club DR01 Q2 A2109001.xlsx"

Per email communications with Sierra Club on November 3rd and 4th, SDG&E is providing 2019 load profiles, as these were previously existing and are what SDG&E utilized in this application. These load profiles are differentiated by climate zone (Inland or Coastal), CARE status (CARE or non-CARE), fuel type (all electric or dual fuel), existence of Electric Vehicle, and customer size (small or large). Small customers are defined here as those with below average peak demand. Large customers are defined as above average peak demand. SDG&E does not specifically create single family or multi-family load profiles.

3. Please provide total annual energy consumption (both electricity and gas) for a typical residential customer in the climate zone or zones determined in Question 1. Please provide these values separately for single-family and multi-family customers.

SDG&E Response:

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SDG&E is defining a "typical residential customer" as a non-CARE customer on SDG&E's default electric rate schedule (Schedule TOU-DR1), with gas service. Total annual energy consumption was calculated as the average annual consumption. Average annual consumption was calculated as the sum of the monthly average consumptions. Meters with fewer than 26 days of billing data were excluded from monthly average calculations.

Please note that SDG&E does not definitively differentiate between single family and multi-family residences. SDG&E utilizes apartment/unit numbers as a proxy for a multi-family designation. All accounts represented in the below table as "single family" have an address that does not include an apartment or unit number. All accounts represented in the below table as "multi-family" have an address that does include an apartment or unit number.

Climate Zone	Dwelling Type	Year	Average Net kWh	Average Therms
Coastal	Single family	2020	5,442	320
Inland	Single family	2020	6,350	317

Climate Zone	Dwelling Type	Year	Average Net kWh	Average Therms
Coastal	Multi-family	2020	3,271	266
Inland	Multi-family	2020	4,236	341

4. Please provide the total number of single-family customers in the climate zone or zones determined in Question 1.

SDG&E Response:

The counts below are as of the March 2021 billing period. Please note that SDG&E is not able to definitively differentiate between single family and multi family residences. SDG&E utilizes apartment/unit numbers as a proxy for a multi family designation. All accounts represented in the below table as "single family" have an address that does not include an apartment or unit number.

Dwelling Type	Climate Zone	# of Accounts
Single family	Coastal	361,868
Single family	Inland	261,306

5. Please provide the total number of multi-family customers in the climate zone or zones determined in Question 1.

SDG&E Response:

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The counts below are as of the March 2021 billing period. Please note that SDG&E does not definitively differentiate between single family and multi family residences. SDG&E utilizes apartment/unit numbers as a proxy for a multi family designation. All accounts represented in the below table as "multi-family" have an address that does include an apartment or unit number.

Dwelling Type	Climate Zone	# of Accounts
Multi-family	Coastal	191,232
Multi-family	Inland	85,734

6. Please provide hourly marginal emissions rates from the electric grid relevant for the climate zone or zones determined in Question 1.

SDG&E Response:

SDG&E objects to the request to the extent that it would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

SDG&E does not calculate hourly marginal emissions rates specific to its service territory or specific climate zones. Therefore, SDG&E is directing Sierra Club to the Integrated Resource Planning (IRP) Proceeding's public Clean System Power (CSP) calculator data. The CSP contains SDG&E's bundled load forecast for 2020 as well as hourly emissions values and hourly load. These will allow Sierra Club to calculate hourly emissions intensity values that can be used as a proxy for the actual hourly emissions rates resulting from electricity generation to meet SDG&E's bundled customer's demand.

SDGE IRP:

https://www.sdge.com/rates-and-regulations/proceedings/2020-individual-integrated-resource-plan

CSP file:

https://www.sdge.com/sites/default/files/regulatory/sdge_csp_38mmt_preferred_conforming_na_v1%20%2 8Attachment%20C%29.xlsx