

**SDG&E 2018 RDW
A.17-12-013**

TURN Data Request TURN-SDG&E-001

To:	Michelle Somerville
Cc:	John Pacheco
From:	Marcel Hawiger (TURN)
Date Sent:	September 28, 2018
Response Due:	October 12, 2018
Subject:	GHG Impacts

Please provide electronic responses to the following questions. Hard copy responses are unnecessary. The responses should be provided on a CD sent by mail or as attachments sent by e-mail to the following people:

Kevin Woodruff
Woodruff Expert Services
1127 - 11th Street, Suite 514
Sacramento, CA 95814
kdw@woodruff-expert-services.com

Marcel Hawiger
The Utility Reform Network (TURN)
785 Market Street, Suite 1400
San Francisco, CA 94103
marcel@turn.org

- For each question, please provide the name of each person who materially contributed to the preparation of the response. If different, please also identify the witness who would be prepared to respond to cross-examination questions regarding the response.
 - For any questions requesting numerical recorded data, **please provide all responses in working Excel spreadsheet format if so available**, with cells and formulae functioning.
 - For any question requesting documents, please interpret the term broadly to include any and all hard copy or electronic documents or records in SDG&E's possession.
 - Finally, if partial responses are available prior to the requested due date, please forward them as soon as they become available. If any of these requests are unclear or otherwise objectionable, please contact Marcel Hawiger as soon as possible so that we may attempt to resolve any problems.
-

The following requests relate to SDG&E's *Prepared Supplemental Testimony of Benjamin A. Montoya* served September 26, 2018 ("SDG&E Supplemental Testimony"). Provide all requested workpapers in electronic Excel-compatible format with all data and formulae intact and functioning.

- 1) Please provide all data and workpapers supporting SDG&E's estimates of the impacts on Greenhouse Gas (GHG) emissions of its proposed changes to residential rate design shown in SDG&E's Supplemental Testimony.
- 2) If not provided in response to Question 1 above, please provide all data and workpapers supporting the data cited below in SDG&E's Supplemental Testimony:
 - a. "Market Prices", "Gas Price", and "Base CO2 Price (\$/tonne)" cited in table on p. BAM-2.
 - b. Marginal GHG Emission Rates shown in table on pp. BAM-3 to BAM-4.
 - c. Net Load Impacts shown in table on p. BAM-5.
 - d. GHG Emissions Impacts shown in table on pp. BAM-5 to BAM-6.
 - e. GHG Cost Impact shown in table on p. BAM-6.
- 3) If not provided in response to Question 1 above, please provide all data and workpapers used to develop the estimated hourly loads used to compute the results shown in the tables on pp. BAM-3 to BAM-6 of SDG&E's Supplemental Testimony.
- 4) Please provide the following information regarding SDG&E's support for the use of a low-efficiency heat rate limit to adjust the Incremental Market Heat Rates (IMHRs), as discussed on pp. BAM-2 and BAM-3 of SDG&E's Supplemental Testimony.
 - a. State whether SDG&E agrees with this convention for treating IMHRs greater than an assumed low-efficiency gas heat rate, and explain why or why not.
 - b. Explain SDG&E's understanding of why IMHRs computed based on CAISO Day-Ahead energy prices may exceed an assumed low-efficiency gas heat rate.