

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

TURN Data Request TURN-SDG&E-005

To:	Michelle Somerville
Cc:	John Pacheco
From:	Marcel Hawiger (TURN)
Date Sent:	October 19, 2018
Response Due:	October 26, 2018
Subject:	Marginal Costs

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.
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The following requests relate to SDG&E's *Prepared Supplemental Testimony of Benjamin A. Montoya* served September 26, 2018 ("SDG&E Supplemental Testimony") and SDG&E's response to TURN's 2nd Data Request ("SDG&E Response to TURN's 2nd Data Request"). Provide all requested workpapers in electronic Excel-compatible format with all data and formulae intact and functioning.

- 1) Please provide the following information about total amount of residential demand used to compute "Net Load Impacts (MWh)" shown on p. BAM-5 of the SDG&E Supplemental Testimony:
 - a. Provide the total amount of residential demand used to compute the cited Net Load Impacts.
 - b. Provide, by hour, the total amount of residential demand used to compute the cited Net Load Impacts.
 - c. Provide the amount of residential demand for each time period shown in the Net Load Impacts table on p. BAM-5.

- 2) Please provide the following information regarding the workpaper titled "Supplemental GHG Emissions Rates_High Spread_Montoya Workpaper.xls", which was provided in response to the 3rd Question of SDG&E's Response to TURN's 2nd Data Request:
 - a. Explain why the "Total MWh load" for each hour shown in Column I of the worksheet titled "TOU" is computed as 600 times the "per Customer AVELI" shown in Column O of the same worksheet.
 - b. Provide any data and workpapers used to develop the multiplier of 600.
 - c. Define the word or acronym "AVELI" in cell O2 of the "TOU" worksheet. If AVELI is a model or workpapers used to develop estimated hourly load impacts of TOU rates, describe the model and provide its documentation.