UCAN DATA REQUEST – SDG&E RESPONSE
Data Request #01
SDG&E RESIDENTIAL UNTIERED ELECTRIFICATION RATE - A.21-09-001
DATE RECEIVED: October 18, 2021
DATE RESPONDED: November 1, 2021

RESPONSE CONTAINS CONFIDENTIAL PROTECTED MATERIALS SUBJECT TO NONDISCLOSURE AGREEMENT

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).

SDG&E further objects to the continuing and indefinite nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). SDG&E will provide all responsive documents in existence at the time of its response. Should UCAN seek to update its request, SDG&E will respond to such a request as a new data request in the future.

1. Please provide all workpapers supporting A.21-09-001, in native format with links and formulae intact.

SDG&E Response:

Subject to and without waiving the foregoing general objections, SDG&E responds as follows:

Please see the attached documents titled "Updated_CONFIDENTIAL - Illustrative Rate Design_A2109001.xlsx" and "TOU-ELEC Bill Model_A2109001.xlsx".

"Updated_CONFIDENTIAL – Illustrative Rate Design_A2109001.xlsx" contains nonpublic "protected materials" subject to nondisclosure agreement (i.e., trade secret, market sensitive, or other confidential and/or proprietary information) as determined by SDG&E in accordance with the provisions of Decision 06-06-066 and subsequent decisions. The Protected Materials have been highlighted in yellow. The confidentiality declaration of Hannah Campi is also provided.

2. Re: Page HC-8: What is the basis for the Commodity price differentials shown in Table HC-2? Please provide all analyses supporting these price differentials.

SDG&E Response:

See "Updated_CONFIDENTIAL – Illustrative Rate Design_A2109001.xlsx". SDG&E set the Off to Super-Off-Peak differentials at 1.5 to incentivize more energy consumption during the daytime hours, outside the on peak period. The differentials between the other TOU periods were allowed to float and not specifically set at their current value.

3. Re: Page HC-9: What is the basis for the non-commodity price differentials shown in Table HC-3? Please provide all analyses supporting these price differentials.

SDG&E Response:
SDG&E is not proposing set total TOU differentials, the differentials shown simply present the result of the set commodity differential above between the off- and super-off-peak TOU periods, and SDG&E's other rate components

4. In analyzing the impact of TOU-ELEC, did SDG&E use specific customer load shapes associated with the eligible technologies (e.g., EV, storage, heat pump space conditioning, heat pump water heater?) if so, please provide:
    a. The load shapes used in the analysis.
    b. The source of the load shapes.
    c. The rationale for selecting these load shapes.
    d. If not, please explain what SDG&E assumed and why.

SDG&E Response:
SDG&E used aggregated customer load shapes for customers enrolled in SDG&E's EV rates, as well as SDG&E's non-EV rates. SDG&E does not collect data on customers who purchase heat pump water heaters or space heaters, and therefore is unable to produce heat pump-specific load profiles. SDG&E did not develop behind-the-meter storage profiles in this bill impact analysis, as customers with storage devices have different dispatch patterns. SDG&E used existing customer load profiles and did not assume load shifting as part of the bill impact analysis, since the various eligible technologies would allow for varying levels of load shifting and introduce additional assumptions about customer behavior.

The bill impact analysis illustrates the structural bill impacts of enrolling in TOU-ELEC using existing load profiles, to understand the circumstances where the rate would be structurally beneficial to customers. The range of technologies as well as the role of behavior change mean that no single assumption is relevant to all potential customers.

5. Has SDG&E conducted any analysis concerning potential cost shifts associated with implementing Tariff TOU-ELEC?
    a. If yes, please provide the analyses.
    b. If not, please explain why not and how SDG&E is considering cost shifts in this application.

SDG&E Response: See attached file titled "A.21-09-001_UCAN DR01Q5.xlsx"

6. What is relationship, if any, between the proposed rate Tariff TOU-ELEC and SDG&E's marginal costs from its latest Phase 2 GRC (A.10-07-009 and A.19-03-002 (cons.)).

SDG&E Response: SDG&E's marginal commodity rates in A.21-09-001 are based on SDG&E's proposed marginal commodity cost study from A.19-03-002. SDG&E's marginal commodity cost study in A.19-03-002 included a proposed public "Schools" customer class, which was denied in

D.21-07-010. The marginal commodity rates used to design "TOU-ELEC" are based on the 2019 GRC Phase 2 marginal commodity cost study, modified to include current customer classes.

7. Re: page HC-9.
    a. What is the basis for selecting the top 3 hourly non-coincident demand peaks over the 12 months that do not occur on the same day?
    b. Please provide all analyses supporting the use of these hours.
    c. Is SDG&E aware of any other rates at SDG&E or at any other utility that base fixed charges on these hours?
    d. Did SDG&E consider any other fixed charge rate design? If so, what was considered any why were the alternative rate designs rejected?

SDG&E Response:

a. SDG&E proposed to use the top three daily non-coincident peak demands to determine a customer's fixed charge to provide customers with more flexibility and encourage them to consistently reduce their demand. Customers who may fall into a higher fixed charge tier due to a high anomalous non-coincident demand on a single day will still be able to offset that higher demand with their typical lower demand, and likely remain in the lower fixed charge tier.

   This design also ensures that the price signal for non-coincident demand is not significantly diluted, and customers pay their cost of service. SDG&E believes this is preferable to using a single data point, i.e., the customer's single annual non-coincident demand.

b. OBJECTION: SDG&E objects to the request on the grounds 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.

c. While SDG&E is not aware of any utilities that currently design residential fixed charges in this manner, SDG&E did not conduct exhaustive research on every existing utility's rate design prior to filing this application. However, designing fixed charges based on a customer's demand is common practice for non-residential rates, and is reflected in many of SDG&E's non-residential rate schedules.

d. **OBJECTION:** SDG&E objects to this request as overly broad, unduly burdensome and exceeding the scope of permissible discovery under Rule 10.1, of the Commission's Rules of Practice and Procedure.

8. Will SDG&E communicate which hours and demand amounts the Tariff TOU-ELEC customer's fixed charges would be based?
    a. If yes, how will SDG&E communicate this?

SDG&E Response:

OBJECTION: SDG&E objects to this request to the extent that it calls for speculation. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

SDG&E anticipates communicating these hours to customers, however, the method in which they will be communicated is dependent on the final adopted rate design and therefore SDG&E does not have detailed implementation information developed at this time.

9. Is the fixed charge based on the rolling prior 12 months peak usage days or the prior calendar year?

SDG&E Response: The fixed charge is not based on a rolling prior 12 months. SDG&E proposes setting the customer's fixed charge for one year based on the three maximum peak days, so the customer will have the same fixed charge for 12 months. After one year the customer's fixed charge level will be reassessed and set for the next year.

10. Re: page HC-10: "The purpose of the fixed charge design is to appropriately set a customer's fixed charge such that it is cost-based, consistent, and understandable."
    a. How is the proposed fixed charges cost based?
    b. Please provide all analysis supporting the charges as cost based.
    c. What is meant by "consistent"? consistent with what? What is the basis for SDG&E asserting that the proposed rate would be consistent?
    d. Why does SDG&E believe that the fixed charge design is understandable?

SDG&E Response:

a. See "Updated_CONFIDENTIAL – Illustrative Rate Design_A2109001.xlsx"
b. See response to 10a.
c. "Consistent" refers to month-to-month consistency in the fixed charge, as opposed to a charge that would change monthly based on demand in each billing cycle.
d. The fixed charge design that does not vary monthly as explained in the response to Question 9 increases understandability. Additionally, SDG&E limited the number of tiers available to customers. SDG&E believes that its proposed design will introduce residential customers to the concept of demand in an understandable way that will allow them to shape their load and reduce their bills accordingly.

11. Re: Page HC-11, figure HC-1.
    a. Please provide the data underlying the figure.
    b. How many customers are in each rate shown in the figure?

SDG&E Response:
See table below showing customer counts bucketed by monthly average non-coincident demand. EV Rates include EV-TOU and EV-TOU-2:

RATE	YEAR	<2 KW	2-4 KW	4-6 KW	6-8 KW	8-10 KW	> 10 KW	TOTAL
DR	2019	140618	213588	91553	21417	6154	3754	477084
TOU DR-1	2019	204246	253099	80292	15930	4017	2426	560010
DR SES	2019	3342	14680	9180	3026	1244	897	32369

EV Rates	2019	275	2107	1914	1173	1254	1460	8183

12. Re: Page 15, Figure HC-2
    a. Please provide the data underlying this figure.
    b. Please provide the calculations underlying the figure (e.g., rates and billing determinants)
    c. Please provide the load profile for each "sample customer" underlying the figure.
    d. How were the sample customer load profiles selected?

SDG&E Response:

a. See attached file "TOU-ELEC Bill Calc Model_ A2109001.xlsx"
b. See attached file "Updated_CONFIDENTIAL – Illustrative Rate Design_A2109001.xlsx"
c. See response to 12a.
d. Profiles were selected from available aggregated load profiles shown on the "Load Profiles" tab of "TOU-ELEC Bill Model_A2109001.xlsx"

13. Did SDG&E prepare bill comparisons using load profiles with the assumed qualifying technologies in place?
    a. If so, please provide these bill comparisons and all underlying assumptions.
    b. If not, the please explain why not.

SDG&E Response:
See response to Question 4.