

**UCAN DATA REQUEST – SDG&E RESPONSE**  
**Data Request #02**  
**SDG&E RESIDENTIAL UNTIERED ELECTRIFICATION RATE - A.21-09-001**  
**DATE RECEIVED: November 5, 2021**  
**DATE RESPONDED: November 22, 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).

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.

**Re: Sheet “Load Profiles”**

1. Column AA contains no data from June 3 onward (rows 3683- 8770). Is this an error? If so please provide a corrected workpaper.

**SDG&E Response:** This load profile does not have complete information available and therefore is not used in the analysis.

2. Please confirm that each data cell in the Table that goes from row 11 to row 8770 represents the SDG&E metered kWh consumption in each hour. If not, what does each value represent?

**SDG&E Response:**

The values in G11:AL8770 are the average of metered kWh across a sample group of customers with the characteristics in cells G5:AL9.

3. Re: Table “Annual Peaks NCD” (rows 8799-8806): Please confirm that the “1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup> and Average of the top 3 annual peaks rows represent peak kilowatt-hour consumption occurring during the hour identified in the “Peak Date” rows. (I.e., for column F, the 1<sup>st</sup> Peak amount is 0.7403 kWhs which occurred on 2/21/19.)

**SDG&E Response:**

The date in rows 8801, 8803, and 8805 corresponds to when the 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> peaks occur respectively.

4. Re: Table of daily peak hour amounts (rows 8811-9176).
  - a. Please confirm that this is the table from which the “Annual Peak NCD” values are taken.

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- b. The logic in the Table of daily peak hour amounts selects the peak hours ONLY during Peak TOU Periods (see that the second logic statement in each formula, which refers to column “F”, which is the flag for TOU period). Is this intended?
- c. Please reconcile the fact that the NCD portion of the model is only selecting hours during the peak TOU period while the testimony states “SDG&E is proposing a fixed monthly customer charge that would be set annually at one of four tiers using the average of a customer’s top 3 hourly non-coincident demand (NCD) peak over 12 months that do not occur on the same day.” (Testimony page HC-9, emphasis added). That is, the testimony does not call out the top 3 hours during peak TOU periods but any top 3 hours not occurring on the same day.

**SDG&E Response:**

The formula should be pulling from all TOU periods, rather than just the On-Peak period. However, this model is not being used to develop logic for actual customer billing. It is intended to show the illustrative impact of various usage patterns for customers who fall into SDG&E’s various proposed fixed charge tiers. As a result the bill impacts displayed are still accurate for the conditions displayed. SDG&E will serve a corrected workpaper in the coming weeks that will update this formula as well as reflect changes to SDG&E’s proposal as described in the email sent to parties on November 18, 2021.

**Re: sheets Bill Impact Summary and Bill Impact Summary (CARE):**

- 5. Cell L4 (“NCD”)
  - a. Please confirm that this cell represents the billing determinant to calculate the fixed charge.
  - b. Is it correct that this cell represents the kilowatt hour usage in the top three hours (per Sheet “Load Profiles”) multiplied by 4?
  - c. Why is this average hourly peak usage multiplied by 4?

**SDG&E Response:**

- a. Cell L4 displays the estimated NCD demand used for determining the fixed charge tier. L4 represents kWh in the top three hours for the selected profile, multiplied by 4.
- b. The profiles shown aggregate multiple accounts, including many multifamily residences, which generally have lower peak demands. Actual demand was not available for aggregated profiles and was approximated from kWh consumption. As a result of aggregation, many profiles show lower demands than many of SDG&E’s single-family home residential customers have in reality. As the bill impact model does not calculate individual customer bills and produces illustrative bills, multiplying by 4 acts as a scalar to show the illustrative bill impacts of customers who fall into the kW ranges in Tiers 3 and 4, which otherwise would not be represented in the analysis.
- c. See response to Question 5(b) above.