

UCAN's 14th Set of Data Requests
A. 06-08-010

1. Please state whether it is SDG&E's position that if the CPUC believes AMI programs will provide reliability benefits but the CAISO refuses to count those benefits, then the CPUC should approve expenditures by SDG&E to provide to the ISO's satisfaction the same benefits the CPUC believes will already be provided by AMI? Please explain the basis for your answer.
2. Please state SDG&E's understanding of the reasons why the CAISO refuses to count the AMI savings benefits.
3. Please state what future actions SDG&E plans to take, if any, to address the CAISO's reluctance to accept AMI savings and allow it to use the AMI-related savings, as set forth in your responses to Question 2.
4. Assuming the CPUC approves the proposed AMI case settlement, please explain in detail SDG&E's logic behind the scenario of how the impact of AMI on future SDG&E peak demand levels assumed in the Sunrise proceeding should be treated any differently than the AMI impact assumed by SDG&E in the AMI proceeding.
5. SDG&E states that "the CAISO is unwilling to count DR as being available for local area reliability requirements" (8/4/06, p. VI-20) but then says "SDG&E does not know whether the CAISO would count AMI impacts as supporting grid reliability benefits in the San Diego area" (response to UCAN DR7-148(a)) and admits it has never asked the CAISO to do so or been told by the CAISO that it would not (response to UCAN DR7-148(b)). Please admit, or provide a narrative explaining why SDG&E does not admit, that:
 - a) SDG&E believes AMI, as proposed in its submitted settlement to the CPUC, will likely produce the peak demand reduction benefits quantified in the sworn testimony of Steven George.
 - b) SDG&E has no basis to believe that the ISO disputes the testimony of Steven George.
 - c) SDG&E has made no effort to ascertain how the ISO would adjust future SDG&E load forecasts which include AMI impacts if the Commission approves AMI.
 - d) SDG&E agrees that the Commission should include the load-reducing benefits of AMI in the Sunrise proceeding reliability and RMR analyses (as SDG&E already did in its 1/26/07 Cases 240 and 241) if the AMI proceeding settlement is adopted by the Commission.