# A.15-04-012

# San Diego Gas & Electric Company Phase 2 General Rate Case

# AReM and DACC Data Request SDGE-01

# December 16, 2015

**Date for Objections: December 23, 2015**

**Response Due Date: January 8, 2016**

TO: Thomas R. Brill

 Attorney for San Diego Gas & Electric Company

FROM: Daniel W. Douglass

 Douglass & Liddell

 Attorneys for Alliance for Retail Energy Markets and Direct Access Customer Coalition

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The following General Instructions apply to each data request:

1. In response to each data request, provide all relevant and responsive information reasonably available to the San Diego Gas & Electric Company (“SDG&E”).

2. If any of the information sought in a data request will not be available by the response date for that request, state the projected date on which such information will become available.

3. Each written response or objection should designate the specific data request and data request item under which it is being provided.

4. Identify each person who provided information used in answering each data request. Such information shall include the full name, occupation, title, employer and organization for each such person, and indicate the information provided by each.

1. Please include in your production all exhibits appended to or referenced in the requested analyses, testimony, discovery or presentation.

Thank you.

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**Background:** D.14-12-024, which was issued in R.13-09-011, adopted a “cost allocation principle” for the utilities’ (i) demand response (DR) programs and tariffs and (ii) tariffs for Critical Peak Pricing, Time-of-Use (TOU), Permanent Load Shifting (PLS), real time pricing (RTP), and peak time rebate (PTR), which are considered to be “Load-Modifying” DR resources (see Table 2, p. 21, D.14-03-026). D.14-12-024 ordered that programs or tariffs that are “only available to bundled customers” shall have the associated program’s costs “allocated solely to generation rates” (D.14-12-024, p. 48; see also Ordering Paragraph 8a, p. 87).

1. The link below[[1]](#footnote-1) provides a table prepared by the Energy Division, which lists SDG&E’s current tariffs and programs subject to the cost allocation principle adopted in D.14-12-024. For each SDG&E tariff or program identified in the spreadsheet, please provide:
	1. Which tariffs or programs are applicable solely to bundled customers; and
	2. Which tariffs or programs are applicable to all customers, including direct access customers, and to which customer groups they apply (*e.g.,* residential, small commercial, agricultural, medium-large commercial and industrial).
2. Please list any additional SDG&E DR-related programs/tariffs or dynamic pricing tariffs that are not listed in the attached spreadsheet and specify the customers applicable to each such new tariff or program.
3. For each SDG&E tariff or program identified in answer to Questions 1 and 2 above and applicable solely to bundled customers, please provide:
	1. The costs that SDG&E proposes to recover in A.15-04-012.
	2. The specific rate element in which SDG&E proposes to recover the associated program costs (i.e., Generation, Transmission or Distribution).
	3. Whether the tariff or program includes separate incentive payments to customers that are not included in the costs specified in answer to Question 3,a and for each such tariff or program, the estimated total costs of the incentives and the specific rate element in which SDG&E proposes to recover those costs (i.e., Generation, Transmission or Distribution).
4. Please provide specific references to the workpapers and testimony demonstrating where SDG&E has complied with the cost allocation principle adopted in D.14-12-024.
5. Footnote 9, p. CS-7 in SDGE-02 (Swartz Testimony) states that SDG&E will address the “cost allocation guidance” provided in D.14-12-024 in the filing of its 2017 demand response program application due on February 1, 2016. Please specify the DR-related programs and tariffs for which SDG&E intends to request cost recovery in the February 2016 filing that are in addition to the DR-related programs and tariffs, which have been included for cost recovery in A.15-04-012.
6. In SDGE-02 (Swartz Testimony), p. CS-9, SDG&E provides two tables (CS-1 and CS-2) summarizing its Distribution Revenue Allocation proposals. Footnotes 11 and 13 to the tables state: “Excludes miscellaneous programs recovered through distribution rates, specifically CSI, SGIP, and Demand Response (“DR”) currently recovered in distribution rates.” Please explain how and why how DR is “currently recovered in distribution rates,” but not included in the distribution revenue allocation.
7. Similarly, Footnote 20, p. CF-20, SDGE-01 (Fang Testimony) states: “With the exception of California Solar Initiative (“CSI”), Self Generation Incentive Program (“SCIP”), and Demand Response (“DR”) program costs, which are included in the distribution rate, but are not incurred on the basis of providing distribution services.” Please explain how and why DR costs “included in the distribution rate” are “not incurred on the basis of providing distribution services.”
8. On p. CS-28 in SDGE-02 (Swartz Testimony), the CPP program is discussed. CPP is a program only applicable to bundled customers. Please provide specific references to the workpapers and testimony demonstrating that the full costs associated with the CPP program have been allocated to the Generation rate element.
9. On pp. CS-53 and CS-54, in SDGE-02 (Swartz Testimony), PTR incentives are discussed. PTR is a program only applicable to bundled customers. Please provide specific references to the workpapers and testimony demonstrating that the full costs associated with the PTR program have been allocated to the Generation rate element.
10. Footnote 4 of Attachment B.2, Distribution Revenue Allocation, in SDGE-06 (Saxe Testimony) states that “the $1,425,717,000 Distribution Revenue Requirement reflects the current distribution revenues being collected in rates effective November 1, 2015, excluding revenues that have separate allocation treatment such as Self Generation Incentive Program ("SGIP"), Demand Response ("DR"), and Customer Service Initiative ("CSI") costs.” Please provide documentation of the dollar amount of the DR portion of the Distribution Revenue Requirement that is being collected in rates effective November 1, 2015, but not included in the Distribution Revenue Requirement specified in Attachment B.2.
11. SDGE-06 (Saxe Testimony), on p. C-3, Attachment C, states that SDG&E is proposing to use DR allocation factors to allocate $2 million in “2013 Adjusted-Recorded Customer Programs & Projects costs,” because the program costs are “mainly associated with demand response.”
	1. Please provide specific details on the program costs that were incurred and document their relationship to SDG&E’s DR programs.
	2. Specify each program that is applicable solely to bundled customers.
	3. Please specify the rate element in which SDG&E proposes to recover these program costs for such bundled-only programs (i.e., Generation, Transmission or Distribution).
12. In D.12-12-004, the Commission determined that the costs associated with SDG&E’s dynamic pricing tariffs for residential and small commercial customers were to be recovered from bundled customers through generation rates.  Please provide specific references to the workpapers and testimony demonstrating where SDG&E has complied with D.12-12-004.
1. <http://www.cpuc.ca.gov/PUC/energy/Procurement/RA/ra_compliance_materials_new.htm> [↑](#footnote-ref-1)