# A.15-04-012

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

# AReM and DACC Data Request SDGE-02

# January 29, 2016

**Date for Objections: February 5, 2016**

**Response Due Date: February 19, 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

 (818) 961-3001

 douglass@energyattorney.com

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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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1. In several responses to AReM-DACC’s Data Request SDGE-01, SDG&E stated that A.15-04-012 is a “revenue neutral proceeding.”
	1. Please explain the meaning of the phrase.
	2. Even if A.15-04-012 is a “revenue neutral proceeding,” please provide the requested cost information.
2. SDG&E’s response to Question 3 in AReM-DACC’s Data Request SDGE-01 was non-responsive and failed to provide the requested cost information. Therefore, please provide the information specified below for each of the following programs and tariffs:
	* Peak Time Rebate for Residential (Schedule PTR)
* Critical Peak Pricing for M/L C&I (Schedule CPP-D)
* Critical Peak Pricing for M/L Agricultural (Schedule CPP-D-AG)
* Smart Pricing Program rate for Small Commercial (Schedule EECC-TOU-A-P)
* Smart Pricing Program rate for Residential (Schedule EECC-TOU-DR-P),
* Smart Pricing Program rate for Agricultural (Schedule EECC-TOU-PA-P).
	1. The dollars that SDG&E is collecting for each such program and tariff.
	2. The specific rate element (i.e., Generation, Transmission or Distribution), in which SDG&E is collecting these dollars for each of such program and tariff.
	3. Whether each such program or tariff includes separate incentive payments to customers that are not included in the dollars specified in answer to Question 2.a and, for each such program or tariff, the estimated total dollars of the incentives and the specific rate element in which SDG&E collects those dollars (i.e., Generation, Transmission or Distribution).
	4. Please provide specific references to the workpapers and testimony for your answers a through c.
1. The Energy Division table provided as a link to Question 1 in AReM-DACC’s Data Request SDGE-01 lists “TOU” as a category of SDG&E DR programs. However, the only “TOU” programs or tariffs noted by SDG&E were in answer to Question 2, which asked about programs that were not included in the Energy Division table.

* 1. Please list each of the specific SDG&E programs and tariffs that are included within the category “TOU” in Energy Division’s table.
	2. Specify the dollars that SDG&E is collecting for each of these TOU programs and tariffs.
	3. Specify the rate element (i.e., Generation, Transmission or Distribution), in which SDG&E is collecting these dollars for each of these TOU programs and tariffs.
	4. Specify whether the TOU program or tariff includes separate incentive payments to customers that are not included in the dollars specified in answer to Question 3.b and, for each such TOU program or tariff, the estimated total dollars of the incentives and the specific rate element in which SDG&E collects those dollars (i.e., Generation, Transmission or Distribution).
	5. Please provide specific references to the workpapers and testimony for your answers b through c.