



ORA

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California Public Utilities Commission

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ORA DATA REQUEST

A.17-01-020: SDG&E SB 350 Transportation Electrification Application

Date: March 22, 2017

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San Diego Gas and Electric Company

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Re: **Data Request No. ORA-A1701020-SDGE-01**
Responses Due: On or before April 3, 2017

INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the ORA contact(s) above with a copy to the ORA attorney.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify ORA as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify ORA as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

DATA REQUESTS

Item 1: Provide all workpapers relating to the SDG&E's Transportation Electrification (TE) Application.

Item 2: In SDG&E's testimony, Ch. 4 RS-9, SDG&E cites a study and notes that 60% of zero emission vehicle drivers claimed that a subsidy on level 2 electric vehicle service equipment (L2 EVSE) made a significant influence on their own decision to acquire an L2 EVSE. Is SDG&E aware of any study that claims that a subsidy on L2 EVSE influences private residents to acquire an electric vehicle? If not, what is SDG&E's basis for claiming that the "Residential Charging Program" will accelerate electric vehicle (EV) adoption as required by Public Utilities Code § 740.12(b)?

Item 3: In SDG&E's testimony, Ch.4 RS-4, SDG&E notes that 89% of its customers are residential. Is this figure a representation of the number of residential customers in SDG&E's service territory over the total number of customers in SDG&E's service territory? If so, what percent of SDG&E's electric load do residential customers make up?

Item 4: Has SDG&E conducted a market study analyzing the potential negative market impact of owning a sufficient number of EVSE's to support 90,000 EVs out of a projected goal of 150,000 EV's in SDG&E's service territory, per Ch. 4 RS-7? If not, how does SDG&E's proposal meet the requirement of Pub. Util. Code § 740.12(a)(1) to not adversely impacting private sector competition?

Item 5: Has SDG&E conducted or know of any studies that indicate that increased battery sizes in EVs correlate to increased daily miles driven compared to the average daily miles driven by cars with internal combustion engines? If not, how does SDG&E justify a need of L2 EVSE for increased miles driven per day?

Item 6: Is SDG&E aware of the number of single-family residences that already have EVs and already have a residential charger installed? If not, how did SDG&E determine the accuracy of its 90,000 L2 EVSE forecast?

Item 7: Regarding SDG&E's "Residential Charging Program," what criteria would be used to determine the point at which SDG&E would remove an L2 EVSE that was provided as part of that program but is subsequently unused?

Item 8: Regarding SDG&E's "Residential Charging Program", SDG&E stated in its testimony, Ch.4 RS-20, that in the case an L2 EVSE was unused, SDGE would "remove the EVSE so that it can be refurbished and recommissioned in a timely manner." What are the estimated costs for removing, refurbishing and recommissioning the L2 EVSE? Please provide a detailed breakdown of these costs.

- a. How will SDG&E address the costs of the make-ready infrastructure if the L2 EVSE is removed and refurbished?
- b. What impact does this removal, refurbishing and recommissioning of the L2 EVSE have on SDG&E's TE program costs?

Item 9: Regarding SDG&E's "Green Taxi/Shuttle/Rideshare Project," does SDG&E propose to limit the use of the charging facilities associated with that project closed to the general project? If so, how will SDG&E monitor the use of the charging stations at those facilities?

Item 10: Regarding SDG&E's "Green Taxi/Shuttle/Rideshare Project," will SDG&E monitor the employment status of the taxi/rideshare drivers? If so, how will that monitoring be done?

Item 11: If a taxi/rideshare driver participating in SDG&E's "Green Taxi/Shuttle/Rideshare Project" received an L2 EVSE at their home and later terminates their employment under their respective taxi/rideshare company, will SDG&E remove, refurbish, and recommission the L2 EVSE?

END OF REQUEST