



ORA

Office of Ratepayer Advocates
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-02**
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

1. Please provide workpapers showing the derivation of SDG&E's proposed rates.
2. For each of SDG&E's existing electric vehicle (EV) rates, please provide the number of customers on the rate and, if applicable, any caps on the total number of customers.
 - a. If SDG&E is aware of any non-EV customers being on its EV rates, please break down these rates by the number of EV customers vs. non-EV customers.
 - b. If SDG&E is aware of any EV customers being on non-EV specific rates (e.g. A-TOU), please also provide the number of EV customers on those rates.
3. How would SDG&E determine whether distribution upgrades at the primary, secondary, and customer levels are needed to enable commercial EV charging? How is clustering considered?
 - a. What is the size of the allowance granted under Line Extension Rules 15 and 16 for distribution upgrades pertaining to incremental commercial EV load? Are there any demarcations associated with the size (i.e. costs associated with accommodating incremental EV load at various sizes)? How about residential EV load?
4. In its testimony, SDG&E proposes a Grid Integration Charge (GIC) that is "based on a customer's maximum annual demand" (p. CF-14). How will maximum annual demand be measured? Will it be measured for the full year prior to and including the current month, or on a calendar-year basis, or another basis? If it is another basis, please describe the process.

5. For each circuit providing service to commercial customers, please:
 - a. Provide the sum of all customers' maximum non coincident demands for each circuit for each of the most recent 12 months. For each circuit, please also provide a chart displaying the how many customers peak in each hour for each of the most recent 12 months.
 - b. Provide the maximum demand registered on each respective circuit for each of the most recent 12 months. Please also indicate the timing of peak for each circuit.
6. Please provide a graph similar to chart 5-2 in SDG&E's testimony, but where each circuit is weighted by its peak load (i.e. the y-axis should be Percent of Total Circuit Peak Load).
7. In SDG&E's description of the C-CPP adder (p. CF-16), it says that "the CPP Adder is applied to the pre-defined 7-hour event period of 11 a.m. to 6 p.m., resulting in total annual CPP hours of 0 to 126 hours." Does SDG&E propose to use the same 11am to 6pm CPP period for its three GIR rates or the newer CPP period proposed in its 2016 General Rate Case Phase 2 (2-6pm)?
8. How many hours will the Distribution Critical Peak Pricing (D-CPP) period cover?
 - a. Will the D-CPP be determined based on the loads of each of SDG&E's circuits over all hours of 2016 or another method? If it will be based on another method, please provide a list of the steps and a description of each method to determine each circuit's D-CPP period.
9. Please provide a Contribution to Margin study in which SDG&E compares the benefits (i.e. payments) of EV customers under its Residential and Commercial GIR rates to a "price floor" of the marginal cost of distribution, marginal cost of *energy* and the sum of non-by passable charges. The non-bypassable charges should include Transmission, Public Purpose Program, Nuclear Decommissioning, Competition Transition, New System Generation, Department of Water Resources Bond, and Power Cost Indifference Amount (PCIA) charges. The amount recovered from customers and the price floor should be expressed in \$/kWh and should be calculated for the first five years (i.e. the entire period of the phase-in of the Grid Integration Charge).
10. Are the three grid integration rates (GIRs) designed to be revenue neutral compared to customers' otherwise applicable tariffs (OATs)? If so, are they revenue neutral with respect to the entire customer class or just to EV customers? Please provide estimates of revenue shortfalls if 5%, 10%, 50% or 100% of current EV customers migrated to the new GIRs.

END OF REQUEST