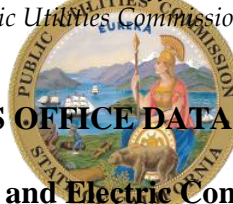


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Public Advocates Office
California Public Utilities Commission



[www.publicadvocates.
cpuc.ca.gov](http://www.publicadvocates.cpuc.ca.gov)

PUBLIC ADVOCATES OFFICE DATA REQUEST

**A.17-12-013: San Diego Gas and Electric Company (SDG&E)
2018 Rate Design Window**

Date: 10/5/2018

To: **Michelle Somerville**

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John A. Pacheco

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From: **Eric Duran**

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Witness

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Response Due Date: ASAP and no later than October 19, 2018

Re: Data Request No. Public Advocates Office-A1712011- SDGE-012

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 Public Advocates Office contact(s) above with a copy to the Public Advocates Office 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 the Public Advocates Office 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 the Public Advocates Office 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

SUBJECT: SUPPLEMENTAL TESTIMONY ON GHG REDUCTIONS

1. Please provide an updated version of the workpaper that SD&GE provided in response to the Public Advocates Office¹ data request 3, question 1a (“SDG&E TOU Ex-Ante Load Impact Protocol Tables.xlsx”) using SDG&E’s most up-to-date price elasticity (-0.1).

Please see the updated [“Ex_ante_documentation_20181016.docx”](#) in attached zipped folder.

2. Is SDG&E’s updated price elasticity (-0.1) a price elasticity of demand or a price elasticity of substitution? If it is a price elasticity of substitution, why did SDG&E choose this concept rather than a price elasticity of demand?

Both price elasticity of demand and price elasticity of substitution were used to calculate the load impacts and subsequent GHG impacts. If the price elasticity of substitution was not used, then the effect of the on-peak price to super off-peak price is ignored. Doing that would fail to capture the shifting of load that happens during the day. If the “own” price elasticity was used then only a reduction during the on-peak period relative to the average rate on the tiered rates would be observed.

3. Has SDG&E’s estimate of forecast hourly customer loads (“reference loads”) changed at all since its original filing on GHG emissions? If so, please describe all changes to SDG&E’s ex ante regression analysis that resulted in the change in reference loads and provide the updated hourly reference loads in the same format as SDG&E’s response to the Public Advocates Office’s DR 3, Q 2e.

SDG&E did not change the reference loads, however, the estimated hourly load impacts were updated with the new price elasticity. The updated hourly reference loads are presented in the tab called 'Table' in the updated "SDG&E Default TOU Ex-Ante Load Impact Protocol Tables_20181016.xlsx" file.

END OF REQUEST

¹ Formerly known as the Office of Ratepayer Advocates.
