

UCAN DATA REQUEST – 03
UCAN Data Request in A.17-12-013
(SDG&E's 2018 RDW Application)

Date: April 12, 2018

Responses

Due: April 26, 2018

To: SDG&E

From: UCAN
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Data Request No: 3
(Please see instructions below)

INSTRUCTIONS:

Pursuant to rule 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure UCAN hereby submits this data request for information from SDG&E. If you will be unable to meet the above deadline, or need to discuss the content of this request, please call UCAN counsel at the number(s) shown above before the due date.

If you are unable to provide the information by the due date, have an objection to any request, or plan to assert a privilege to any request, please provide a written explanation to UCAN's counsel seven calendar days before the due date as to why the response date cannot be met and your best estimate of when the information can be provided.

If you are asserting an objection or privilege, please provide the specific nature of that objection or privilege claimed and the facts upon which such claim is based. If any document is redacted, please clearly identify and describe any information that is redacted from the document

and provide an explanation for the redaction. Please identify the person who provides the response and his (her) phone number. Provide electronic responses if possible.

If a document is available in Word or Excel format, do not send it as a PDF file. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any number is calculated, include a copy of all electronic files so the formula and their sources can be reviewed.

These data requests shall be deemed continuing in nature so that you shall produce any additional or more current information that come to your attention after your initial responses have been sent up to the time of hearing or settlement.

UCAN Data Request 3 to SDG&E in A.17-12-013

1. The testimony of Ms. Fang states, “SDG&E’s proposed Mass TOU Default rate will be a tiered TOU rate, which is intended to limit the bill impact of defaulting to TOU.” (CF-13)
 - a. Please provide the results of any supporting analysis that shows that defaulting to a tiered TOU rate as opposed to a non-tiered TOU rate has lower bill impacts.
 - b. Please provide illustrative rates that would use the same TOU periods as SDG&E’s proposed three-period and two-period TOU rates but would not be tiered or include any increases in fixed charges or minimum bill.
2. Please provide a revised version of Attachment C to the testimony of Mr. Shaughnessy that includes an additional column on all pages that shows the typical charges for customers if they took service under SDG&E’s proposed 2019 two-period TOU rate.
3. Please provide a revised version of Ms. Fang’s Charts 2 and 3 showing 2019 tiered rates compared to SDG&E’s proposed 2019 two-period time of use rate.
4. Please provide a revised version of Attachment C to the testimony of Mr. Shaughnessy that shows the typical charges for customers if they were on rates with the same TOU periods as SDG&E’s proposed three-period and two-period TOU rates but without tiers or any increases in fixed charges or minimum bill.
5. The testimony of Ms. Fang states, “SDG&E proposes that residential customers defaulting to TOU will receive bill protection.” (CF-13) According to SDG&E’s response to ORA-SDGE-002, only customers defaulting to or opting for TOU-DR-1 will receive bill protection.
 - a. Please define bill protection.
 - b. Why will customers taking service under TOU-DR-2 not be provided bill protection?
6. The testimony of Ms. Fang states that a 3-period TOU rate is “more cost-based.” (CF-14)

- a. What is the cost basis advantage for the volumetric rates in SDG&E's proposed default 3-period TOU rate compared to the two-period opt out rate?
 - b. Which TOU periods, if any, are designed to have volumetric rates equal to marginal costs?
 - c. Please provide all analysis showing the cost basis of each of SDG&E's proposed TOU rates for residential customers.
7. Please provide the energy, generation capacity, distribution, and transmission marginal costs associated with each of the TOU periods in SDG&E's 2-period and 3-period TOU rate proposals along with the source for these marginal costs, specifying whether they have been adopted in a prior proceeding. If these costs were not adopted in a prior proceeding, please provide all workpapers demonstrating the derivation of these costs.
8. Under SDG&E's proposal will all residential customers have the option to opt out into a non-tiered TOU rate without a high fixed charge before 2020? If so, please provide a summary of this rate design option. If not, why not?
9. The testimony of Mr. Bender states, "Holding the control group until the end will enable load and behavioral analytics to be performed against the original Default TOU Pilot participants, throughout the Mass TOU Default transition period."
 - a. How were control group participants selected?
 - b. Are control group participants allowed to opt out of the control group at any time in order to enroll on a different rate schedule? If not, please specify the limitations on rate switching for control group participants.
 - c. What benefits will the referenced load and behavioral analytics provide that are not expected to be provided by the analytics of the Default TOU Pilot prior to March 2019?
 - d. For control group participants who would benefit under TOU rates and whose enrollment onto TOU rates would be delayed on account of their participation in the control group, do the benefits to these customers of the additional analytics that SDG&E would obtain during the Mass TOU Default transition period offset the rate impacts of their delay in TOU enrollment? If not, do the benefits to the system from these additional analytics outweigh the customer harm? Please explain, specifying any benefits to control group participants and/or to the system that SDG&E anticipates from the additional analytics that would be obtained during the Mass TOU Default transition period.
 - e. What specific questions does SDG&E seek to answer from data that will be obtained through the pilot study during the Mass TOU Default transition period?
10. The testimony of Mr. Bender lists customers that will be excluded from default TOU rates on page CB-6. Which excluded customers will still have the ability to opt into TOU rates under SDG&E's proposal and how will such options be communicated to these customers?
11. The testimony of Mr. Bender states, "Based on the CIS replacement schedule, it is critical that the Mass TOU Default transition is completed by December 2019, to ensure there is

no overlap into the design phase.” (p. CB-15) Based on SDG&E’s response to SDGE_ED_02, UCAN understands Mr. Bender intended to say test phase instead of design phase.

- a. What is the current expected start date of the test phase?
 - b. If the test phase is unexpectedly delayed before the start of customer outreach for the Mass TOU Default, will SDG&E delay implementation of Mass TOU Default to provide more opportunity to prepare customers for the change? If not, why not?
 - c. What are the specific consequences of not completing the Mass TOU Default transition before the CIS test phase?
12. The testimony of Mr. Bender states, “the Mass TOU Migration Plan will migrate approximately 750,000 eligible residential customers onto TOU pricing over a ten-month period between March 2019 and December 2019.” (CB-2)
- a. Why is SDG&E proposing a ten-month migration period instead of a shorter or longer period?
 - b. What is the shortest period of time in which SDG&E could feasibly transition all eligible residential ratepayers to default TOU rates?
 - c. What are the benefits of lengthening the transition period beyond the shortest feasible transition period?
 - d. Would it be feasible to transition customers to TOU rates in a two-month period beginning September 2019 instead of a ten-month period? If so, why is SDG&E proposing a ten-month period? If not, why not?
 - e. Does SDG&E have any evidence of the impacts of a rolling enrollment period (in which not all customers are enrolled at once) on customer understanding of rate changes, including potential confusion regarding the implementation timing or a customer’s implementation status?
 - f. In enrolling commercial and industrial customer classes onto mandatory TOU rates, did SDG&E use rolling enrollment periods? If not, why does SDG&E propose to do so for residential customers?
13. The testimony of Mr. Tantum states, “Messages and tips will encourage reducing energy use during peak periods.” (HT-4)
- a. Please provide examples on the tips that will be provided on how to reduce energy use during peak periods.
 - b. Will such tips include estimates of the cost and cost savings of doing a load of laundry and running a dishwasher during peak hours and off-peak hours? If not, why not? If so, when and how will this information be provided to customers?
 - c. Will customers be provided information on how smart thermostats and other smart home devices can help control energy-consuming devices such that they run during off-peak periods? If not, why not? If so, when and how will this information be provided to customers?

14. What rate options will be available to electric vehicle owners, and how will such customers be informed of the benefits of charging vehicles in off-peak or super off-peak hours?
15. Will SDG&E's outreach materials include information about the benefits of west-facing solar panels for maximizing solar energy production during evening hours? If so, what materials will be provided and when? If not, why not?
16. Regarding the Rate Comparison Mailer Campaigns discussed in the testimony of Mr. Tantom on page HT-18:
 - a. Please provide a sample mailer that shows what type of information will be provided to customers. If available, please also show how the information will be presented to customers.
 - b. How soon before a customer's rate transition date will the mailer be provided? (If all mailers are to be sent at the same time, please specify when this mailing would be scheduled.)
 - c. Will the rate comparison mailer be provided to all residential customers? If not, which customers will be excluded and why?
17. The testimony of Mr. Tantom states, "SDG&E will launch a comprehensive local campaign to address the negatively impacted customers with personalized information and solutions that are critical to mitigating potential negative bill impacts." Please provide specific information about who will be contacted in this campaign, what personalized information will be provided, and how customers will be contacted.
18. The testimony of Mr. Tantom states, "These materials will also direct customers to utilize online, self-service options to either enroll or opt out of their respective TOU pricing plan."
 - a. Will the only way to opt out of TOU pricing be through an online web portal? If not, what other means will be available?
 - b. Will a dedicated phone line be made available for people to ask questions and opt out into a different rate if desired? If not, why not?
19. The testimony of Mr. Tantom states, "Direct mail and email will be used throughout the four phases. SDG&E is planning at least four touch-points: 60 days prior to default, 30 days prior to default, at the time of default and post-default, which may include after care and/or end of bill protection communications" (HT-19). For each of these touchpoints, please specify which customers will receive direct mail, which customers will receive e-mail, and which customers will receive both direct mail and e-mail.
20. The testimony of Mr. Tantom states, "Others, such as those who are positively impacted by TOU rates, may need fewer touchpoints."
 - a. What is the minimum number of (i) direct mail and (ii) e-mail touchpoints SDG&E will use?
 - b. How can customers contact SDG&E to notify it that they are aware of the impending rate change and no longer wish to receive notifications?

21. What restrictions, if any, is SDG&E planning to place on a residential customer's ability to switch between different rate tariffs (including any restrictions on the number of times per year that a customer may switch tariffs)? Please specify how these restrictions will differ during and after the bill protection period, and please explain the reason for these restrictions, including any statutory or regulatory requirements.
22. In regard to the bill impact analysis in Attachment C to the testimony of Mr. Shaughnessy and the Bill Impact Calculator workbook sent in response to ORA-DR05 (assuming the Bill Impact Calculator is set to estimate bills based on 2019 rates), please answer the following:
 - a. The referenced Attachment C refers to "energy charges". Please define what is meant by energy charges and whether and how these differ from the charges estimated in the Bill Impact Calculator workbook.
 - b. Please explain the differences in estimated bills and bill impacts between the two analyses for customers with less than 50 kWh of energy consumption.
 - c. Page 1 of Attachment C shows lower energy charges for the group of customers consuming 25-50 kWh compared to customers consuming less than 25 kWh. Why is that the case?