

THE UTILITY REFORM NETWORK (TURN) DATA REQUEST
TURN-SDG&E-DR-06
SDG&E POWER YOUR DRIVE (PYD) 2.0 (A.19-10-012)
SDG&E RESPONSE
DATE RECEIVED: JULY 1, 2020
DATE RESPONDED: JULY 16, 2020

TURN DATA REQUEST

The following questions relate to SDG&E's [rebuttal Testimony, Chapter 2](#).

Question 1

SDG&E states at pp. RS-2-3, lines 17-2, that “it is SDG&E’s experience that no MUD site hosts have been interested in owning their own EVSE with respect to SDG&E’s utility transportation electrification efforts.”

- a. Please provide the basis of this statement, including written documents, emails, sources, etc.
- b. Please provide the number of MuDs, and the percentage of the total, for which site host ownership was discussed or provided as an option.
- c. Please provide all survey responses that indicate MuD ownership preferences.
- d. Please provide all studies known to SDG&E that demonstrate whether or not these site hosts prefer to own EVSE.

SDG&E Response

a. The quoted statement in SDG&E’s rebuttal testimony is anecdotal – conversations that have taken place between potential site hosts and SDG&E’s Clean Transportation team at various times over the life of the PYD Pilot and at Marketing, Education, and Outreach events. The reference is not to a specific discussion of ownership options, but rather, to a series of conversations with various site hosts over time where they remarked that they like the idea of a turn-key solution provided by SDG&E in the PYD Pilot, and lack the funds necessary to take on a project like this themselves.

b. No such records were kept.

c. No surveys were conducted on this topic prior to rebuttal testimony, but a survey is underway per ALJ direction and results will be served to the service list when complete.

d. Please see answer to 1a. There were no studies known to SDG&E that demonstrated ownership preferences.

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Question 2

SDG&E discusses on p. RS-13, several “factors...for evaluating and prioritizing interested sites for participation in the PYD Extension Program:”

- a. Is one factor expected utilization? If yes, please explain how this will be assessed. If no, please explain why not.
- b. Does SDG&E commit to only including sites with greater than 0 kWh utilization in the first three years of deployment? If yes, please explain how this will be accomplished. If no, please explain why not.

SDG&E Response

a. The factors for evaluating and prioritizing interested sites for participation in the PYD Extension Program are shown in Randy Schimka’s Chapter 2 testimony on page RS-8, as follows:

- MUD or workplace site categorization;
- DAC status;
- Current and expected volume of EV drivers;
- Number of charging ports desired;
- MUD deeded parking status;
- Type of installation (parking lot or parking structure);
- WiFi / connectivity signal strength;
- Distance between power source and new electric service point;
- Estimated cost for infrastructure and EV charging station installation; and
- Capability of complying with Americans with Disabilities Act (“ADA”) accessible parking requirements.

The third factor above (Current and expected volume of EV drivers) will lead towards an estimate of the expected utilization of the charging stations. In the PYD Pilot, site hosts were asked to do a survey of their employees or residents to see how many EVs were present, and how many people would consider purchasing an EV if charging stations were to be installed. A similar method of assessing potential users of the charging stations will be done for the PYD Extension Program. Sites are assessed based on all the criteria above, including current EV drivers and potential buyers of EVs at the proposed locations.

b. Because of the employee/resident survey process mentioned in Question 2a, SDG&E believes that constructed PYD Extension Program sites will have more utilization than 0 kWh. Between existing EV owners, future EV buyers, or a combination of the two, there will be users of the charging stations.

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Question 3

Pages RS-15 to RS-16 list eight “items that a typical workplace site host will be responsible for in a typical installation beyond just the EVSE.”

- a. For each item, please provide the expected annual or one-time cost, and indicate if the proposed workplace rebate could be used to offset the cost. Please provide all supporting workpapers, calculations, and sources.
- b. Please provide the percentage of total installation costs based on the estimates provided in part (a) that will be paid by ratepayers versus the site host. This includes all “make-ready” and rebate costs currently proposed to be incurred by ratepayers.

SDG&E Response

a. SDG&E’s Application cost estimates assumed the EVSE rebate of \$3,000 is only eligible for the cost of the EVSE. SDG&E does not have cost estimates for installation and maintenance costs that may be incurred by the site host. These costs may vary substantially by site host depending on the EVSP selected, installation contractor selected, and ongoing maintenance and warranty service levels chosen.

b. SDG&E does not have cost estimates for the installation of the EVSEs site hosts may incur. The table below provides some preliminary ranges a site host may incur depending on site-specific conditions.

Site Host cost items	Site Host Cost Range
Purchase EVSE, including shipping	Unknown, depends on Brand/Model of EVSE purchased. Site host responsible for any costs above \$3,000 per port.
External communications	\$0 – \$25,000, depending on signal strength
Design drawing for EVSE	\$1,000 – \$5,000
Permits	\$0 – \$1,000
Installation work	Unknown, could vary significantly depending on site host negotiations with contractor
Monthly billing fees	\$0-\$100 per port depending on plan
Monthly network fees	\$0-\$100 per port depending on plan
Maintenance costs for EVSE as needed	Unknown, depends on EVSE and warranty plan

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The following questions relate to SDG&E's [rebuttal Testimony, Chapter 3](#).

Question 4

SDG&E states at p. JB-3, lines 18-19, “the Commission should reject TURN’s recommendation that SDG&E adhere to a \$15,000 per port average cost.”

- a. If SDG&E leverages additional funds from workplaces, please explain why SDG&E could not meet the \$15,000/port average cost target. Please provide all supporting sources and workpapers related to this response.
- b. Please explain why SDG&E is unable to lower unit costs relative to its pilot implementation. Please provide all supporting evidence and sources.

SDG&E Response

a. SDG&E’s actual costs to install 3,040 nozzles for the PYD Pilot program after excluding the billing system upgrade costs were \$21,815 and is estimated to be \$21,605 per port for the PYD Extension¹. For SDG&E to meet a \$15,000 per port average, site hosts would need to provide approximately \$60-70K in additional funding for a 10-nozzle site. Finding site hosts able to support this level of funding would be a significant barrier to deploying the program.

b. SDG&E based the estimates of the PYD Extension on the actual costs of constructing over 250 sites from the PYD Pilot program. The costs were based on market conditions to procure materials, EVSEs, and third party supporting including construction labor and engineering design services. SDG&E is unable to lower unit costs relative to the PYD Pilot for the PYD Extension estimates because SDG&E assumes these construction and support costs will remain stable or increase.

¹ Prepared Rebuttal testimony of John Black (JB-2)

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Question 5

Page JB-2 shows the PYD pilot deployed charging infrastructure for around \$22,000 per port. Please compare this cost to PG&E’s and SDG&E’s unit costs in their pilot, and provide all supporting workpapers and calculations.

SDG&E Response

SDG&E does not have all the necessary information from PG&E’s pilot costs to compare unit costs to SDG&E’s PYD Pilot program. The table below shows the construction cost per port and total program cost per port from the Power Your Drive eighth semi-annual report.

Figure 10: Power Your Drive Costs by Site and Port

<i>Average Estimated Costs</i>	<i>Original Filing Assumptions (Direct)</i>	<i>Inception-to-date as of 1/31/2020 (Direct)</i>	<i>Inception-to-date as of 1/31/2020 (Fully Loaded)</i>
<i>Construction Cost per Site (Design, Construction, Materials)</i>	<i>\$99K – \$109K (10 ports/site up to 550 sites)</i>	<i>\$191K (\$48m for 254 sites)</i>	<i>\$200K (\$51m for 254 sites)</i>
<i>Construction Cost per Port (Design, Construction, Materials)</i>	<i>\$9.9K - \$10.9K (\$54M for up to 5,550 ports)</i>	<i>\$15.9K (\$48M for 3,040 ports energized)</i>	<i>\$16.7K (\$51M for 3,040 ports energized)</i>
<i>Program Cost per Site</i>	<i>\$116K - \$128K (\$64M up to 550 sites)</i>	<i>\$249K (\$63M for 254 sites)</i>	<i>\$277K (\$70M for 254 sites)</i>
<i>Program Cost per Port</i>	<i>\$11.6K - \$12.8K (\$64M for up to 5,500 ports)</i>	<i>\$20.8K (\$63M for 3,040 ports energized)</i>	<i>\$23K (\$70M for 3,040 ports energized)</i>

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Question 6

Please explain why, at more than \$22,000 per port per SDG&E's estimate on p. JB-2, SDG&E's ratepayers must pay the highest, or among the highest, unit costs in the state to deploy charging infrastructure and stations, as shown in Figure 1, page 8, of TURN's opening testimony.

- a. Does SDG&E need more labor hours than other utilities or third-party contractors? Please quantify on a per port basis if possible and provide all supporting workpapers and sources related to this response.
- b. Are SDG&E's labor costs higher than other utilities or third-party contractors? Please quantify on a per port basis if possible and provide all supporting workpapers and sources related to this response.
- c. Are SDG&E's permit costs higher than other utilities or areas of the state? Please quantify and provide all supporting workpapers and sources related to this response.
- d. Please provide a list and quantify in percentage and unit (per port) terms other costs incurred by SDG&E that are not incurred in other parts of the state or for other utility and state programs.

SDG&E Response

SDG&E's estimated cost per port of \$21,605 to implement the PYD Extension program before escalation and contingency is based on the actual costs to implement the PYD Pilot program and includes all estimated cost categories including indirect costs and AFUDC. It is not clear as to what types of costs are included or excluded in TURN's analysis for each California utility. SDG&E is unable to confirm if SDG&E ratepayers are paying more for EV infrastructure because it cannot verify the costs being included or excluded for other state utility programs.

- a. SDG&E does not have the data from other utilities to perform this analysis.
- b. SDG&E does not have the data from other utilities to perform this analysis.
- c. SDG&E does not have the data from other utilities to perform this analysis.
- d. SDG&E incurred \$4M in IT Billing system upgrade costs as part of the PYD Pilot program. These costs were related to the implementation of the VGI dynamic rate included in the program decision. The implementation of the VGI dynamic rate was unique to SDG&E's pilot program compared to other state utility EV pilots.

END OF RESPONSE