

Application: A.26-02-001

Exhibit No.: SDGE-05-R

Witness: Chelsea Haro

PREPARED REVISED DIRECT TESTIMONY OF
CHELSEA HARO
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY
CHAPTER 5 - IMPLEMENTATION

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



June 1, 2026

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**PREPARED REVISED DIRECT TESTIMONY OF
CHELSEA HARO
CHAPTER 5 - IMPLEMENTATION**

I. OVERVIEW AND PURPOSE

This prepared revised direct testimony outlines the design and implementation costs for San Diego Gas & Electric’s (SDG&E) proposed demand flexibility rates (Proposed DF Rates). SDG&E submits this revised testimony pursuant to the April 30, 2026 Assigned Commissioner’s Scoping Memo and Ruling (Scoping Memo) permitting SDG&E to provide supplemental and/or revised testimony prior to intervenor testimony to account for changes resulting from implementation of a new Medium Commercial customer class on April 1, 2026, which requires a new DF rate proposal.¹ The only revisions to this testimony is an updated Attachment B, the illustrative electric class average rates for the DF Rate Proposal, to account for inclusion of the Medium Commercial customer class. The application complies with Ordering Paragraph (OP) 1 of Decision (D.) 25-08-049 (Guidance Decision), which directs SDG&E to file a consolidated application for Proposed DF Rates across all customer classes, except streetlighting, in alignment with the California Energy Commission’s (CEC) Load Management Standards (LMS). My testimony focuses on the implementation design and costs required to implement the Proposed DF Rates for all customer classes.

My testimony is organized as follows:

- **Section I – Overview and Purpose**
- **Section II – Implementation Design**
- **Section III – Implementation Costs**

¹ Scoping Memo at 4; *see also* D.25-08-049 at COL 1 (“It is reasonable to [] direct SDG&E to file a consolidated application for DF Rate Proposals to comply with the guidance in this decision for all customer classes . . .”).

- 1 • **Section IV – Summary and Conclusion**
- 2 • **Section V – Statement of Qualifications**
- 3 • **Attachment A – Proposed Timeline**
- 4 • **Attachment B – Illustrative Electric Class Average Rates**
- 5 • **Attachment C - Proposed Implementation Costs**
- 6 • **Attachment D - Illustrative Rate Components for DF Rates**

7 **II. IMPLEMENTATION DESIGN**

8 SDG&E’s Proposed DF Rates will be available to all customer classes, except
9 streetlighting. SDG&E intends to evaluate how customers respond to hourly price signals (load
10 impacts) as well as potential bill reductions and cost savings to rate payers. As noted in D.25-
11 08-049, the “California Energy Commission adopted the Load Management Standards to
12 motivate electric customers to shift electricity demand, or load, from high-demand periods when
13 peaking power plants and other polluting generators tend to be in use, to periods when lower-cost
14 clean electricity is available,”² in turn providing energy efficiency and grid reliability that
15 benefits both participants and non-participants.

16 On October 13, 2025, SDG&E convened a meeting with Clean Energy Alliance and San
17 Diego Community Power (Joint CCAs or CCAs) to review the proposed rate design and respond
18 to questions regarding their ability to implement DF rates independently. An additional meeting
19 was held January 7, 2026, to support ongoing collaboration, gather feedback and address any
20 questions.

² D.25-08-049 at 3.

1 **A. Eligibility**

2 SDG&E’s Proposed DF Rates will be available to all customer classes, excluding
3 streetlighting. The rate structure will include both commodity and non-commodity components,³
4 enabling the CCAs to offer an equivalent DF rate to their respective customers for the
5 commodity component.

6 Participation in the Proposed DF Rates will be subject to certain eligibility restrictions.
7 Customers enrolled in Net Energy Metering (NEM), Net Billing Tariff (NBT), conjunctive
8 billing⁴ arrangements, or grandfathered time-of-use (TOU) rates⁵ will not be eligible to
9 participate. With affordability and ease of understanding as important considerations, SDG&E
10 determined that implementing NEM, NBT, and conjunctive billing would be overly complex and
11 cost-prohibitive. Additionally, these options are unlikely to provide customers with greater
12 benefits compared to their current rate structures. Customers currently enrolled in an ineligible
13 rate must transition off that rate before enrolling in a Proposed DF Rate.

14 **B. Enrollment**

15 Proposed DF Rates will be optional tariffs available to eligible customers. Participation
16 in the Proposed DF Rates will be voluntary, and customers electing to enroll will be transitioned
17 to the applicable Proposed DF Rate at the start of their next billing cycle following confirmation
18 of eligibility.⁶ Pursuant to the Guidance Decision and the LMS, the Proposed DF Rates design
19 incorporates non-commodity components. This structure provides the Joint CCAs with the

³ Non-commodity components include Utility Distribution Company (UDC) and Wildfire Fund Non-Bypassable Charges (WF-NBC) rate components.

⁴ Conjunctive Billing reflects customers with multiple meters on a single premise, where interval meter data is combined or subtracted for the purpose of billing

⁵ SDG&E’s grandfathered TOU is expiring July 31, 2027 (December 31, 2027 for schools).

⁶ Customer to be enrolled at the beginning of the next billing cycle upon giving SDG&E at least five business days’ notice before the end of the customer’s billing cycle. Otherwise, customer will be enrolled at the beginning of the subsequent billing cycle.

1 ability to develop and implement LMS compliant DF rate offerings for customers within their
2 service territories.

3 The optional nature of the Proposed DF Rates is intended to promote customer choice
4 while supporting innovation in DF models. SDG&E will clearly communicate the enrollment
5 processes, eligibility criteria, and rate components to customers and CCAs to enable informed
6 decision-making and a successful implementation of the rate.

7 Customer participation in DF rates will be assessed, through Measurement and
8 Evaluation (M&E) activities, as detailed in the Chapter 7 of SDG&E’s testimony. These efforts
9 will include quantitative and qualitative analyses designed to evaluate enrollment trends,
10 customer engagement, and overall program performance against established objectives.

11 **C. Unenrollment**

12 Customers participating in the Proposed DF Rates may elect to unenroll at any time after
13 a one-year period on the rate, per Tariff Electric Rule 12. Unenrollment will take effect at the
14 beginning of the customer’s next billing cycle.⁷ Upon unenrollment, the customer will revert to
15 the applicable default rates under their standard tariff unless an alternative eligible rate option is
16 selected.

17 SDG&E proposes to apply the provisions of Electric Rule 12, which restrict customers to
18 “only one rate schedule change...in any twelve-month period,”⁸ to mitigate the risk of rate
19 arbitrage that is possible due to hourly pricing on the Proposed DF Rates that may fluctuate
20 above or below the customer’s otherwise default rates. Without appropriate safeguards, this

⁷ Customer to be unenrolled at the beginning of the next billing cycle upon giving SDG&E at least five business days’ notice before the end of the customer’s billing cycle. Otherwise, customer will be unenrolled at the beginning of the subsequent billing cycle.

⁸ SDG&E, Tariff Electric Rule 12, *available at* https://www.sdge.com/sites/default/files/elec_elec-rules_erule12.pdf.

1 variability could create opportunities for sophisticated customers to engage in rate arbitrage by
2 switching between the Proposed DF Rates, CCA or Direct Access (DA) programs, and default
3 rates to secure the lowest price. Limiting the potential for rate arbitrage avoids the potential for
4 cost shifting across customers.

5 **D. Customer Notification**

6 SDG&E will create a webpage similar to its existing Dynamic Export Rate Pilot (DERP)
7 webpage on the SDG&E website to provide timely and transparent access to hourly DF rates.⁹
8 Hourly prices for the Proposed DF Rates will be posted by 6:00 p.m. Pacific Time on the day
9 prior to their effective date, ensuring customers and market participants have sufficient time to
10 review and plan accordingly. The posted hourly prices will represent the full commodity rate
11 applicable to the Proposed DF Rates. In addition, SDG&E will upload the same pricing data to
12 the Market Informed Demand Automation Server (MIDAS) platform, enabling access for
13 customers, third-party providers, and CCA or DA entities. This dual posting approach promotes
14 transparency, facilitates market-informed decision-making, and supports interoperability with
15 automated demand response and pricing systems. Details of the commodity, distribution and
16 transmission rate calculations are further outlined in Chapters 1-4 of testimony.

17 SDG&E will continue to provide DF rate participants with access to their hourly usage
18 data through SDG&E's secure online account portal. This functionality enables customers to
19 monitor consumption patterns and make informed decisions in response to DF hourly pricing
20 signals. In addition, DF participants who wish to share their usage data with third-party service
21 providers, such as energy management companies or technology vendors, may do so by utilizing

⁹ See <https://www.sdge.com/dynamic-export-rate-pilot-program>. Note that time-of-use transmission pricing and location-based distribution pricing will be included on the applicable tariff.

1 SDG&E’s existing data-sharing protocols.¹⁰ These protocols are designed with applicable
2 privacy and security standards in mind, including customer consent, and facilitate
3 interoperability with third-party tools that support demand response and load management
4 strategies.

5 **III. IMPLEMENTATION COSTS**

6 SDG&E proposes to track and recover implementation costs associated with the
7 Proposed DF Rates through a two-way balancing account, consistent with California Public
8 Utilities Commission (Commission)-approved cost recovery mechanisms. Details of the
9 proposed account are addressed in Chapter 8 of testimony.

10 In developing the Proposed DF Rates, SDG&E considered numerous factors including
11 cost/affordability, technical complexity, customer understanding, and potential customer
12 participation. To the extent possible and technically feasible, and in compliance with the
13 Guidance Decision, SDG&E prioritized a customer-centric approach focused on relative
14 simplicity, transparency, and ease of use.

15 The costs associated with the Proposed DF Rates reflect both capital expenditures and
16 incremental operating costs incurred by SDG&E in the design, implementation, and
17 administration. These costs include, but are not limited to, system integration and Information
18 Technology (IT) upgrades, customer outreach and education, measurement and evaluation
19 activities, and ongoing program support.

20 A summary of the proposed implementation costs is included as Attachment C to this
21 filing. These costs represent an estimate of the necessary resources for appropriate rate design,
22 customer engagement, program integrity, and compliance with applicable Commission directives

¹⁰ <https://www.sdge.com/green-button>SDG&E Green Button data initiative, *available at:*
<https://www.sdge.com/green-button>

1 as described in this testimony. To the extent the rate design and other aspects of rate
2 implementation differ from those proposed in the Application, the associated costs and estimates
3 will likely also change from those included in Attachment C.

4 **A. Billing System**

5 To minimize overall implementation costs for the Proposed DF Rates, SDG&E proposes
6 to leverage existing functionality within its billing system currently supporting the Grid
7 Integrated Rate (Schedule PUBLIC GIR), Vehicle Grid Integration (VGI) and DERP. By
8 utilizing these established capabilities, SDG&E anticipates reducing the need for more extensive
9 system development and integration, thereby lowering total implementation costs.

10 SDG&E forecasts that the total billing system costs for implementing the Proposed DF
11 Rates within its billing system will be approximately \$5.4 million. These costs encompass the
12 following key activities: 1) planning, analyzing, and developing billing system requirements; 2)
13 designing, building, and validating the new rate and calculations within the billing system; 3)
14 designing, building, and validating enrollment notifications and communication tools; 4)
15 designing, building and validating detailed usage/charges in MyEnergyCenter; 5) performing
16 quality assurance and end-to-end testing to ensure overall accuracy of the system; 6) deploying
17 and stabilizing the implemented changes; and 7) updating for CAISO pricing, reporting, and
18 MIDAS updates.

19 **B. Price Webpage**

20 SDG&E proposes implementing a dedicated webpage to provide DF rate participants
21 with daily access to hourly price information. This webpage will serve as a centralized,
22 customer-facing platform designed to promote transparency and enable informed decision-
23 making by displaying dynamic prices by 6:00 p.m. Pacific Time for the following day. To
24 develop and maintain this functionality, SDG&E forecasts implementation costs of

1 approximately \$0.545 million, which are included within \$5.4 million allocated the billing
2 system updates. These costs will include, but are not limited to: 1) webpage design and
3 development; 2) system integration; 3) testing and quality assurance; 4) deployment and
4 stabilization; and 5) uploads to MIDAS.

5 **C. Marketing, Education and Outreach (ME&O)**

6 SDG&E recognizes that effective Marketing, Education, and Outreach (ME&O) is
7 critical to the success of DF rates. A comprehensive ME&O strategy will promote customer
8 understanding of the program’s objectives, eligibility requirements, enrollment process, and the
9 tools available to manage energy usage under DF conditions.

10 The description of all ME&O activities, customer support initiatives, and details on the
11 associated estimated budget is provided in Chapter 6 of SDG&E’s prepared direct testimony.

12 The cost associated with the ME&O effort as described in Chapter 6 is estimated to be
13 approximately \$2.5 million.

14 **D. Measurement and Evaluation (M&E)**

15 SDG&E will implement a comprehensive M&E framework to assess the effectiveness of
16 DF rates. This framework will evaluate key performance indicators, including changes in
17 customer energy usage (load impacts), potential bill reductions for participating customers, and
18 cost savings realized by the utility. If there is insufficient participation for this evaluation, non-
19 participant surveys will still be administered.

20 These analyses may provide insight into the program’s ability to support the
21 Commission’s DF OIR objectives to: (a) enhance the reliability of California’s electric system;
22 (b) make electric bills more affordable and equitable; (c) reduce long-term system costs through

1 more efficient pricing of electricity; and (d) enable participation in DF by both bundled and
2 unbundled customers as outlined in D.25-08-049.¹¹

3 The description of all M&E activities, methodologies, and associated estimated budgets
4 is provided in Chapter 7 of SGD&E's prepared direct testimony. The cost associated with the
5 M&E effort, as described in Chapter 7, is estimated to be \$1.6 million.

6 **E. Rate and Bill Impact**

7 The total estimated cost to implement the Proposed DF Rates is approximately \$9.5
8 million. In Chapter 9 of its testimony, SDG&E converts these costs to a revenue requirement.
9 SDG&E proposes to include the Commission approved revenue requirement beginning as early
10 as 2028 through 2031, , beginning January 1 following a decision if practicable. Balancing
11 account treatment of such amounts is addressed in Chapter 8 of testimony. SDG&E will
12 continue to recover ongoing forecasted annual revenue requirements with its January 1 rate
13 changes until it is included in a future General Rate Case (GRC).

14 Similar to DERP, SDG&E proposes that implementation costs approved by the
15 Commission be included in the Public Purpose Program (PPP) rate component for all customer
16 classes using the equal-cents per kWh allocator. Allocating costs to all customers is reasonable
17 because DF rates are designed to encourage load shifting during periods of high demand and any
18 resulting load shift supports decarbonization and grid reliability which benefit all customers
19 regardless of their participation in the rate.

20 In accordance with D.25-08-049, SDG&E will also provide customer protection
21 mechanisms to mitigate some price volatility while maintaining the price signals necessary to
22 encourage load shifting. Customer protections are detailed in Chapter 4 of SDG&E's testimony.

¹¹ D.25-08-049 at 4.

1 To the extent the Proposed DF Rates design or other aspects of rate implementation differ
2 from those proposed by SDG&E in this Application, the cost estimates included herein will need
3 reconsideration and may differ significantly from those included herein.

4 **F. Duration and Timeline**

5 Assuming adoption of SDG&E's Proposed DF Rates as described in this Application,
6 and based on the factors outlined above, including requirements for development, billing system
7 configuration, testing, quality assurance, and ME&O, SDG&E anticipates that the Proposed DF
8 Rates will be available for customer enrollment approximately 10 months following a final
9 decision in this proceeding. However, to the extent the rate design or other aspects of rate
10 implementation differ from those proposed by SDG&E in this Application, the timeline may also
11 differ. See Attachment A for an illustration of the proposed schedule and timeline.

12 **IV. SUMMARY AND CONCLUSION**

13 SDG&E recommends that the Commission adopt the Proposed DF Rates and the
14 implementation costs described above to support the successful implementation of the Proposed
15 DF Rates.

16 This concludes my prepared revised direct testimony.

1 **V. STATEMENT OF QUALIFICATIONS**

2 My name is Chelsea Haro and I am a Business Economic Advisor in the Customer
3 Pricing department for SDG&E. My business address is 8330 Century Park Court, San Diego,
4 California, 92123. I have held this position for approximately 2 years. I previously held multiple
5 roles at Calpine Energy Solutions over a three-year period, with responsibilities spanning data
6 analytics, client support, and reporting. I received a Bachelor of Science degree in Psychology
7 from the University of La Verne in 2012.

8
9 I have not previously testified before the Commission.

ATTACHMENT A

PROPOSED TIMELINE: SUBJECT TO CHANGE

Pre Implementation				Year 1 Implementation				Year 2 Implementation				Year 3 Implementation				
Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Implementation Planning & Development																
				Preparation for M&E				M&E Year 1 Evaluation and Survey				M&E Year 2 Evaluation and Survey				
				Enrollment campaign, education and targeted support				Dynamic Pricing Available to customers								
	Preparation for ME&O							Refresh campaign and education	Enrollment campaign, education and targeted support							

ATTACHMENT B
ILLUSTRATIVE ELECTRIC CLASS AVERAGE RATES
FOR PROPOSED DF RATES

Customer Class	Bundled Rates (4/1/2026)	Proposed Bundled Rates	Change	Change
	(¢/kWh)	(¢/kWh)	(¢/kWh)	(%)
Residential	43.87	43.89	0.02	0.04%
Small Commercial	40.35	40.37	0.02	0.04%
Medium Commercial	38.63	38.65	0.02	0.04%
L C&I	38.12	38.14	0.02	0.04%
Agriculture	26.31	26.33	0.02	0.06%
Lighting	26.54	26.56	0.02	0.06%
System Total	39.63	39.64	0.02	0.04%

ATTACHMENT C
PROPOSED IMPLEMENTATION COSTS

Activity Item	Estimated Cost
Billing System	\$ 5,405,000
Measurement and Evaluation (M&E)	\$ 1,647,780
Marketing, Education and Outreach (ME&O)	\$ 2,454,927
Total	\$ 9,507,707

ATTACHMENT D

ILLUSTRATIVE RATE COMPONENTS BY CUSTOMER CLASS¹

Residential											
Type	Units	Transmission	Distribution Base Rate	PPP	ND	CTC	LGC	RS	TRAC	TOTAL UDC	WF-NBC + DWR-BC
Base Services Charge	\$/Day	0.00000	0.63391	0.02913	0.00000	0.00000	0.13039	0.00000	0.00000	0.79343	0.00000
On Peak: Summer	\$/kWh	0.17407	0.15368	0.01515	0.00000	(0.00007)	0.00000	0.00005	0.06762	Variable	0.00591
Off Peak: Summer	\$/kWh	0.10148	0.15368	0.01515	0.00000	(0.00007)	0.00000	0.00005	0.06762	Variable	0.00591
Super Off Peak: Summer	\$/kWh	0.10148	0.15368	0.01515	0.00000	(0.00007)	0.00000	0.00005	0.06762	Variable	0.00591
On Peak: Winter	\$/kWh	0.11577	0.15368	0.01515	0.00000	(0.00007)	0.00000	0.00005	0.06762	Variable	0.00591
Off Peak: Winter	\$/kWh	0.10148	0.15368	0.01515	0.00000	(0.00007)	0.00000	0.00005	0.06762	Variable	0.00591
Super Off Peak: Winter	\$/kWh	0.10148	0.15368	0.01515	0.00000	(0.00007)	0.00000	0.00005	0.06762	Variable	0.00591
Type	Units	Other	Rate component								
EPMC	\$/kWh	2.96185	Commodity								
MGCC	\$/kWh	1.12832	Commodity								
EECC	\$/kWh	Variable (CAISO, DLF, EPMC, MGCC)	Commodity								
Distribution Capacity Adder	\$/kWh	Variable (Top 200 hours by circuit)	Distribution								
TRBBA	\$/kWh	-0.00304	Transmission								
TACBAA	\$/kWh	-0.00993	Transmission								

Small Commercial											
Type	Units	Transmission	Distribution Base Rate	PPP	ND	CTC	LGC	RS	TRAC	TOTAL UDC	WF-NBC + DWR-BC
Base Services Charge	\$/Month	0.00	19.23	0.00	0.00	0.00	0.00	0.00	0.00	19.23	0.00
On Peak: Summer	\$/kWh	0.10686	0.16050	0.02000	0.00000	(0.00007)	0.00864	0.00005	0.00000	Variable	0.00591
Off Peak: Summer	\$/kWh	0.05529	0.16050	0.02000	0.00000	(0.00007)	0.00864	0.00005	0.00000	Variable	0.00591
Super Off Peak: Summer											
On Peak: Winter	\$/kWh	0.06584	0.16050	0.02000	0.00000	(0.00007)	0.00864	0.00005	0.00000	Variable	0.00591
Off Peak: Winter	\$/kWh	0.05529	0.16050	0.02000	0.00000	(0.00007)	0.00864	0.00005	0.00000	Variable	0.00591
Super Off Peak: Winter											
Type	Units	Other	Rate component								
EPMC	\$/kWh	2.96185	Commodity								
MGCC	\$/kWh	0.97253	Commodity								
EECC	\$/kWh	Variable (CAISO, DLF, EPMC, MGCC)	Commodity								
Distribution Capacity Adder	\$/kWh	Variable (Top 200 hours by circuit)	Distribution								
TRBBA	\$/kWh	-0.00304	Transmission								
TACBAA	\$/kWh	-0.00993	Transmission								

¹ Non-commodity rates are based on 4/1/2026 rates

Medium Commercial											
Type	Units	Transmission	Distribution Base Rate	PPP	ND	CTC	LGC	RS	TRAC	TOTAL UDC	WF-NBC + DWR-BC
Base Services Charge	\$/Month	0.00	209.77	0.00	0.00	0.00	0.00	0.00	0.00	209.77	0.00
On Peak: Summer	\$/kWh	0.00000	0.06041	0.01830	0.00000	(0.00007)	0.00879	0.00005	0.00000	Variable	0.00591
Off Peak: Summer	\$/kWh	0.00000	0.06041	0.01830	0.00000	(0.00007)	0.00879	0.00005	0.00000	Variable	0.00591
Super Off Peak: Summer	\$/kWh	0.00000	0.06041	0.01830	0.00000	(0.00007)	0.00879	0.00005	0.00000	Variable	0.00591
On Peak: Winter	\$/kWh	0.00000	0.06041	0.01830	0.00000	(0.00007)	0.00879	0.00005	0.00000	Variable	0.00591
Off Peak: Winter	\$/kWh	0.00000	0.06041	0.01830	0.00000	(0.00007)	0.00879	0.00005	0.00000	Variable	0.00591
Super Off Peak: Winter	\$/kWh	0.00000	0.06041	0.01830	0.00000	(0.00007)	0.00879	0.00005	0.00000	Variable	0.00591
Non-coincident Demand	\$/kW	22.89	9.30								0.00
Demand On Peak: Summer	\$/kW	5.06									
Demand On Peak: Winter	\$/kW	4.88									
Type	Units	Other	Rate component								
EPMC	\$/kWh	2.96185	Commodity								
MGCC	\$/kWh	2.04809	Commodity								
ECC	\$/kWh	Variable (CAISO, DLF, EPMC, MGCC)	Commodity								
Distribution Capacity Adder	\$/kWh	Variable (Top 200 hours by circuit)	Distribution								
TRBBA	\$/kWh	-0.00304	Transmission								
TACBAA	\$/kWh	-0.00993	Transmission								

Large Commercial											
Type	Units	Transmission	Distribution Base Rate	PPP	ND	CTC	LGC	RS	TRAC	TOTAL UDC	WF-NBC + DWR-BC
Base Services Charge	\$/Month	0.00	749.39	0.00	0.00	0.00	0.00	0.00	0.00	749.39	0.00
On Peak: Summer	\$/kWh	0.00000	0.10463	0.01840	0.00000	(0.00007)	0.00883	0.00005	0.00000	Variable	0.00591
Off Peak: Summer	\$/kWh	0.00000	0.10463	0.01840	0.00000	(0.00007)	0.00883	0.00005	0.00000	Variable	0.00591
Super Off Peak: Summer	\$/kWh	0.00000	0.10463	0.01840	0.00000	(0.00007)	0.00883	0.00005	0.00000	Variable	0.00591
On Peak: Winter	\$/kWh	0.00000	0.10463	0.01840	0.00000	(0.00007)	0.00883	0.00005	0.00000	Variable	0.00591
Off Peak: Winter	\$/kWh	0.00000	0.10463	0.01840	0.00000	(0.00007)	0.00883	0.00005	0.00000	Variable	0.00591
Super Off Peak: Winter	\$/kWh	0.00000	0.10463	0.01840	0.00000	(0.00007)	0.00883	0.00005	0.00000	Variable	0.00591
Non-coincident Demand	\$/kW	22.89	23.38								
Demand On Peak: Summer	\$/kW	5.06									
Demand On Peak: Winter	\$/kW	1.05									
Type	Units	Other	Rate component								
EPMC	\$/kWh	2.96185	Commodity								
MGCC	\$/kWh	1.43111	Commodity								
ECC	\$/kWh	Variable (CAISO, DLF, EPMC, MGCC)	Commodity								
Distribution Capacity Adder	\$/kWh	Variable (Top 200 hours by circuit)	Distribution								
TRBBA	\$/kWh	-0.00304	Transmission								
TACBAA	\$/kWh	-0.00993	Transmission								

Agriculture											
Type	Units	Transmission	Distribution Base Rate	PPP	ND	CTC	LGC	RS	TRAC	TOTAL UDC	WF-NBC + DWR-BC
Base Services Charge	\$/Month	0.00	26.30	0.00	0.00	0.00	0.00	0.00	0.00	26.30	0.00
On Peak: Summer	\$/kWh	0.06929	0.10337	0.01676	0.00000	(0.00004)	0.00505	0.00005	0.00000	Variable	0.00591
Off Peak: Summer	\$/kWh	0.03282	0.10337	0.01676	0.00000	(0.00004)	0.00505	0.00005	0.00000	Variable	0.00591
Super Off Peak: Summer	\$/kWh										
On Peak: Winter	\$/kWh	0.04171	0.10337	0.01676	0.00000	(0.00004)	0.00505	0.00005	0.00000	Variable	0.00591
Off Peak: Winter	\$/kWh	0.03282	0.10337	0.01676	0.00000	(0.00004)	0.00505	0.00005	0.00000	Variable	0.00591
Type	Units	Other	Rate component								
EPMC	\$/kWh	2.96185	Commodity								
MGCC	\$/kWh	1.82311	Commodity								
		Variable (CAISO, DLF, EPMC, MGCC)	Commodity								
EECC	\$/kWh	Variable (Top 200 hours by circuit)	Commodity								
Distribution Capacity Adder	\$/kWh		Distribution								
TRBBA	\$/kWh	-0.00304	Transmission								
TACBAA	\$/kWh	-0.00993	Transmission								