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Proceeding No.:	A.26-02-001
Witness:	Jeff DeTuri
Date:	November 9, 2026

REBUTTAL TESTIMONY OF

JEFF DeTURI

ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

CHAPTER 1 - POLICY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

November 9, 2026

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PREPARED REBUTTAL TESTIMONY OF
JEFF DETURI

I. PURPOSE

The purpose of my rebuttal testimony is to address intervenors' prepared direct testimony served on September 11, 2026 in San Diego Gas & Electric Company's (SDG&E) Application (A.) 26-02-001. Specifically, my rebuttal testimony will address the following contentions made in intervenor testimony:

- San Diego Community Power (SDCP) and Clean Energy Alliance (CEA) (collectively, the SD CCAs) and Utility Consumers' Action Network (UCAN) argument that near real time data is required for SD CCA participation in the Proposed Demand Flexibility (DF) Rates.
- SD CCAs' and UCAN's assertion that SDG&E failed to collaborate with the SD CCAs and their proposal for a formal and structured collaborative framework.
- UCAN's argument that the Marginal Generation Capacity Cost (MGCC) should be based on the Avoided Cost Calculator (ACC).
- SD CCAs' concerns about cost shifting and SD CCAs' and Public Advocates Office at the California Public Utilities Commission's (Cal Advocates) concerns about whether the rate is revenue neutral.
- Cal Advocates' position that SDG&E is not entitled to revenue requirement associated with the rate.

Notably, Cal Advocates expressed support for SDG&E's proposed marginal commodity cost components, distribution pricing approach, interim time of use (TOU) transmission methodology, and price limiters, subject to monitoring and future refinement.[1] SDG&E further notes that in addition to Cal Advocates' support for these aspects of SDG&E's Proposed DF Rates design, no other parties' objected to or commented on SDG&E's proposals for these

[1] Opening Testimony in Response to San Diego Gas & Electric Company's Dynamic Rate Application (A.) 26-02-001 - Chapter 1 Rate Design (September 11, 2026) (Cal Advocates Opening Testimony, Chapter 1) at 2-3.

aspects of its rate design. SDG&E addresses each of the arguments noted above in this testimony and addresses various other issues in its rebuttal testimony for other chapters. SDG&E's failure to address any individual issue in this rebuttal testimony does not imply agreement by SDG&E with any argument, position, or proposal asserted by parties.

II. THE SD CCAs' CHOSE NOT TO OFFER A DF RATE—THEIR CLAIMS REGARDING LACK OF DATA ACCESS AND COLLABORATION ARE MERE DISTRACTIONS

The SD CCAs and UCAN argue that unbundled customers have "limited or no opportunity to participate in the [Proposed DF Rates,]"[2] that SDG&E violated the Commission's directive by failing to adequately collaborate with the SD CCAs,[3] and that the Proposed DF Rates create "the potential for unlawful cost shifts to unbundled customers."[4] Each of these arguments is rebutted by two simple facts (1) all of SDG&E's customers—both bundled and unbundled—can participate in SDG&E's Proposed DF Rates; and (2) the SD CCAs have *elected* not to offer their own LMS-compliant generation rate. The SD CCAs and UCAN attempt to shift responsibility to SDG&E for the SD CCA's decision not to offer a generation rate and distract from this decision with irrelevant arguments about collaboration and real-time meter data access. The facts show that the SD CCAs have sufficient access to customer data for purposes of creating a generation rate and to the extent they seek real-time meter data access, that issue is not relevant here and should not be decided in this proceeding. The SD CCAs also had sufficient time to collaborate further if they felt it necessary.

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[2] Prepared Direct Testimony on behalf of San Diego Community Power and Clean Energy Alliance in San Diego Gas & Electric Company's Application for Approval of Demand Flexibility Rates (September 11, 2006) (SD CCA Opening Testimony) at 5.

[3] *See, e.g., id.* at 12.

[4] *Id.*

A. Unbundled Customers are Eligible for Participation in the Proposed DF Rates

The SD CCA and UCAN claim that meter data access is necessary for their customers to participate in demand flexibility rates is false.[5] For one, unbundled customers are eligible to participate in SDG&E's unbundled Proposed DF Rates, which contain a distribution and transmission component. The SD CCAs and UCAN admit this,[6] but nonetheless claim that unbundled customers cannot "meaningfully participate" due to the SD CCAs alleged lack of data access.[7] SDG&E addresses this contention below, but the fact remains that unbundled customers are eligible to participate in SDG&E's Proposed DF Rates and the SD CCAs' and UCAN's contentions otherwise are entirely false.

The SD CCAs' concerns regarding data access do not establish that CCA customers are excluded from the benefits or functionality of the Proposed DF Rates. It's more a question of how much benefit can a CCA customer whose CCA refuses to offer a generation DF rate component can benefit from only distribution and transmission DF rate components. Cal Advocates agrees with this assessment noting that "(t)he amount of benefits that San Diego Community Power and Clean Energy Alliance (Joint CCAs) customers can directly receive depends on whether the Joint CCAs choose to participate."[8]

If the CPUC agrees with the SD CCA position, then the SD CCAs choosing not to provide their customers with a generation DF rate component would also prevent SDG&E's

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[5] *Id.* at 14*; see also* Testimony of Luke Tougas of The Utility Consumers' Action Network Concerning San Diego Gas and Electric Company's Approval of Demand Flexibility Rates in Compliance with D.25-08-049 (September 11, 2026) (UCAN Opening Testimony) at 15-16.

[6] SD CCA Opening Testimony at 82; UCAN Opening Testimony at 16.

[7] SD CCA Opening Testimony at 91.

[8] Opening Testimony in Response to San Diego Gas & Electric Company's Dynamic Rate Application (A.) 26-02-001 - Chapter 3 Revenue Requirement and Cost Recovery (September 11, 2026) (Cal Advocates Opening Testimony, Chapter 3) at 17.

customers from the right to choose a DF rate. The SD CCAs are arguing that their choice to not provide a generation DF rate should also prevent SDG&E's bundled customers from participating in DF rates, holding SDG&E's customers hostage to the demands of the SD CCAs.

B. THE SD CCASS DO NOT NEED ADDITIONAL DATA ACCESS FOR CUSTOMER PARTICIPATION IN A DF RATE

Despite the Guidance Decision ruling that the issue of data sharing and data access should be scoped into a Rulemaking,[9] data sharing was nonetheless scoped into this proceeding via two scoping issues:

> How should real-time energy usage data related to SDG&E's Demand Flexibility rates be tracked and reported to the Commission while ensuring compliance with the customer protection directives, including those adopted in D.25-08-049?
>
> When, and how frequently, should SDG&E share data with Load Serving Entities such as Direct Access providers and Community Choice Aggregators, to broaden the knowledge of how all customers could participate in, and/or benefit from, SDG&E's proposed Demand Flexibility rates?[10]

No party addressed the first of these data sharing issues in their intervenor testimony, and SDG&E does not see any reason for the Commission to seek real-time energy usage data related to adopted demand flexibility rates. SDG&E will be providing Measurement & Evaluation of its adopted demand flexibility rates, which will provide information and data to the Commission on the responsiveness of participants to the flexible price signals. Without additional information on how the Commission would use real-time energy usage data related to SDG&E's Proposed DF Rates, SDG&E believes the Measurement & Evaluation report and data will be sufficient.

With respect to the issue of when and how frequently SDG&E should share data with the SD CCAs and DA providers, SDG&E contends that its current data sharing practices are

[9] Decision (D.) 25-08-049 at 12.

[10] Assigned Commissioner's Scoping Memo and Ruling (April 30, 2026) (Scoping Memo and Ruling), Issues 7 and 8 at 3.

sufficient for purposes of customer participation in the Proposed DF Rates and for LSE compliance with the LMS requirements to offer their own DF rate. The SD CCAs and UCAN argue that the SD CCAs cannot provide a DF generation rate until they have access to real-time meter data.[11] SDG&E does not use real-time meter data in designing its Proposed DF Rates and contends that the SD CCAs similarly do not need to use real-time meter data to design and offer a DF Rate. The SD CCAs are making a choice not to provide their customers with DF generation rates. Accordingly, other than the fact that the SD CCAs are attempting to use this proceeding as a lever to obtain real-time interval meter data, there is no barrier to the SD CCAs offering a generation DF rate for their customers to participate in. The Commission should find that additional data access is unnecessary and irrelevant to a decision on whether SDG&E's Proposed DF Rates are just and reasonable.

The SD CCA and UCAN claims that real-time meter data is necessary for an SD CCA DF generation rate should be rejected for the following reasons:

- The SD CCAs can provide a generation DF rate without real-time or near real-time meter data and unbundled customers can participate in SDG&E's proposed distribution DF rate (with DF distribution and transmission components) regardless of whether the SD CCAs offer a generation DF rate. In fact, SDG&E's generation DF rate component methodology was not even opposed by the SD CCAs, despite SDG&E not using real-time or near real-time meter data for any part of its proposal.
- The SD CCAs offer no rate design or analysis to demonstrate why real-time or near real-time meter data access is necessary.
- The SD CCAs are unable to articulate exactly what access they need and when they need it.
- The SD CCAs argue for meter data parity which is out of scope of this proceeding.

[11] SD CCA Opening Testimony at 8; UCAN Opening Testimony at 4.

1. *Real-Time interval meter data access is not necessary for DF generation rates*

SDG&E is quite certain that a DF generation rate can be created without access to real-time or near real-time meter data because SDG&E's DF generation rate does not rely on real-time or near real-time meter data.[12] And in fact, intervenors, including the SD CCAs and UCAN, the very parties that claim meter data is necessary for a CCA generation rate, do not identify any deficiency in SDG&E's proposed DF generation rate design that could be addressed through the use of real-time or near real-time meter data. This clearly shows that real-time or near real-time meter data is not ***necessary*** for a DF rate but is the ***preference or choice*** for the SD CCAs.

2. *SDG&E has already provided the meter data access the SD CCAs requested for purposes of an RTP Rate in A.21-12-006*

In June of 2023, the SD CCAs stated that interval meter data two days after power flow was necessary to conduct a Real Time Pricing (RTP) pilot independent of SDG&E.[13] Since that time, SDG&E has provided data access, via a CCA data lake, within this acceptable period.[14] The SD CCAs now argue that they require real-time or near real-time interval meter data in order to design a DF generation rate.[15] The SD CCAs are moving the goal post and have not provided any reason why meter data is necessary, much less a reason why real-time meter data is necessary to design a DF generation rate.

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[12] *See* Attachment A hereto, SDG&E Response to Cal Advocates Data Request 023 (October 12, 2026), at question 1(a) and 1(c).

[13] A.21-12-006, Opening Brief of San Diego Community Power and Clean Energy Alliance (June 9, 2023) (SD CCA RTP Pilot Opening Comments) at 5-6.

[14] SD CCA Opening Testimony at 51.

[15] *Id.* at 6.

Further, the SD CCAs seek to use SDG&E's previous support for Commission consideration of all potential costs associated with a DF rate, including the CCAs data access requests, as evidence that SDG&E's Application should be rejected absent the real-time or near real-time data access the SD CCAs' now request.[16] The Commission should not draw such a sweeping and overinclusive conclusion and a careful reading of SDG&E's position on this issue reveals as much. As quoted in the SD CCAs' testimony, SDG&E previously argued in its Application for Rehearing of D.25-08-049 that Commission consideration of the systems and processes for data sharing and transmission was necessary to fully assess rate design and its successful implementation.[17] But now that the SD CCAs have been given the opportunity to present testimony on the need for data sharing, they have failed to show that any additional data access is actually necessary for the design of a DF rate. SDG&E has consistently stated that CCA participation in a DF rate is of significant importance to the success of a DF Rate,[18] but that does not mean the SD CCAs should be permitted to demand "real-time data access" as a prerequisite to its participation when real-time data access is *not a necessary* prerequisite to its participation. Nor should the Commission permit the SD CCAs' intentional decision not to offer a DF generation rate interfere with Commission approval of a reasonable SDG&E rate that is compliant with the CEC LMS regulations and the Commission's Guidance Decision.

[16] *Id.*

[17] *Id.* (quoting, at length, Rulemaking (R.) 22-07-005, Application for Rehearing of Decision 25-08-049 by San Diego Gas & Electric Company (September 29, 2025) at 27).

[18] Prepared Direct Testimony of Jeff DeTuri on behalf of San Diego Gas & Electric Company Chapter 1 - Policy (February 2, 2026) (SDG&E Direct Testimony, Policy) at 1-2.

3. *The SD CCAs and UCAN fail to provide concrete reasons why real-time interval meter data is necessary for a DF generation rate*

Although the SD CCAs have argued that data access was necessary for a CCA participation in a DF rate since SDG&E's previous RTP application filed in 2021, which access was subsequently provided, the SD CCAs have yet to provide *any* DF generation rate design, much less one that requires the data access they argue they need.[19] All the SD CCAs offer are anecdotal examples of how it could be used while never stating how they actually plan to use it.[20] Instead, they make it clear what they really want the meter data for, which has nothing to do with DF rates.[21]

In response to an SDG&E data request as to how the SD CCAs plan to use customer interval meter data for future DF rates, the SD CCAs responded, in relevant part, as follows:

> Interval data would support customer outreach and education. For example, when generation prices remain unusually high or low for multiple days, timely interval data could help identify how participating customers' usage interacts with those price signals. The SD CCAs would use that information to alert customers to sustained price conditions within an actionable timeframe, explain the potential bill impacts, and provide information regarding when customers may consider shifting their usage. This type of timely customer engagement is important to helping customers understand and respond to a demand flexibility rate. Without sufficiently timely data, customers may be more exposed to price shocks and market volatility, creating a risk of adverse customer experiences with demand flexibility rates. The SD CCAs' testimony also explains in detail how timelier access to interval data would improve their load forecasting processes. Interval meter data would support the ongoing administration and evaluation of a future demand flexibility rate. More timely data would allow the SD CCAs to react to real-time market conditions and customer usage and provide feedback to participating customers in an actionable manner.[22]

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[19] *See, e.g.,* SD CCA RTP Pilot Opening Comments at 5.

[20] SD CCA Opening Testimony at 36, 39-40, 49-50, and 126; Attachment B hereto, SDCP and CEA Response to SDG&E Data Request DR 02 at question 2.

[21] *See, e.g.,* SD CCA Opening Testimony at 14, 41-45, 50, 42, 43-45, 50, and 71.

[22] *See* Attachment B hereto, SD CCA Response to SDG&E DR 02 at Question 2.

Thus, the crux of the SD CCAs' argument is that their customers cannot effectively participate in SDG&E's Proposed DF Rates and that the SD CCAs' cannot design a DF generation rate for their customers ***unless the SD CCAs can communicate with their customers regarding high prices after energy usage.*** In other words, they argue that the DF price signals themselves are not what customers will respond to, but rather that they will respond to the SD CCAs' communications regarding high prices and/or high usage ***after*** those customers have already experienced high prices. This position defeats the point of DF rates. If SD CCA customers are truly responding to SD CCA customer communications rather than commodity price signals, those communications should come before energy usage—not after. After-the-fact meter interval usage data is not necessary to communicate price signals. And, despite SDG&E's efforts in providing meter data 2 days after power flow and in seeking additional information via this proceeding on why additional data access may be necessary for effective CCA participation in DF rates, the SD CCAs have not provided adequate support that any additional data access is truly necessary.

The SD CCAs have not provided a rate design that relies on real-time or near real-time meter data. Nor have they offered any detailed specifics as to exactly how real-time or near real-time meter data would be used on an on-going basis. The only record of a DF generation rate design in this proceeding is the one SDG&E proposed which does not rely on real-time or near real-time meter data.[23] Accordingly, the Commission should conclude that real time interval meter data is not necessary for DF rates and disregard the SD CCAs arguments on this issue.

[23] See Section II, B, 1.

4. *Meter data parity is out of scope*

The SD CCAs "recommend that the Commission establish a clear, enforceable meter data access parity standard and require SDG&E to provide customers and the CCAs with access to customer energy data at a latency available within SDG&E's existing fleet of meters and operational systems."[24] The SD CCAs state that customer energy data should delivered to "the applicable LSE and authorized third parties to integrate data into customer service platforms, forecasting tools, dynamic pricing operations and demand response and DERMS [Distributed Energy Resource Systems] systems."[25] However, the issue of meter data parity, to the extent it relates to anything other than DF rates and specifically SDG&E's Proposed DF Rates, is out of the scope of this proceeding. As a reminder, the two data access issues in scope in this proceeding are as follows:

> How should real-time energy usage data ***related to SDG&E's Demand Flexibility rates*** be tracked and reported to the Commission while ensuring compliance with the customer protection directives, including those adopted in D.25-08-049?
>
> When, and how frequently, should SDG&E share data with Load Serving Entities such as Direct Access providers and Community Choice Aggregators, ***to broaden the knowledge of how all customers could participate in, and/or benefit from, SDG&E's proposed Demand Flexibility rates***?[26]

As stated above, the SD CCAs have not provided any rate design that would require interval meter data and their argument for interval meter data as it relates to a *potential* DF generation rate—that it is necessary to communicate with customers *after* energy use—is both vague and arguably nonsensical. However, the Commission should be attuned to the SD CCAs' testimony regarding other, non-DF rate related, uses for interval meter data and consider whether those uses

[24] SD CCA Opening Testimony at 67-68.

[25] *Id.* at 68.

[26] Assigned Commissioner's Scoping Memo and Ruling, Issues 7 and 8 at 3 (emphasis added).

are relevant to this proceeding. For instance, the SD CCAs include the following statements in testimony about its need for and use of real-time data:

- CEA's Energy Programs Plan anticipates a future commercial expansion of the PeakSmart Savers program and the development of a Distributed Energy Resources Management System ("DERMS") platform to incentivize customers to shift energy use away from peak periods. The DERMS platform will serve as a foundational capability for CEA to further transition from passive energy procurement toward active system optimization and distributed resource participation. By leveraging advanced forecasting, real-time visibility, and automated control capabilities, the DERMS will enable CEA to enhance grid reliability, reduce costs, and support California's broader clean energy and decarbonization goals. The dispatch of this system and connected devices will be reliant on real-time data access to call events based on accurate and up to date load data.[27]

- In addition, data latency reduces CCAs' load forecasting accuracy and increases procurement costs, exacerbating the state's energy affordability crisis.[28]

- More timely meter data access would significantly impact SD CCAs' Day-Ahead aggregated load forecasting processes and procurement initiatives.[29]

- Access to near real-time usage data would lead to a lower Mean Absolute Percentage Error ("MAPE") in day-ahead load forecasting and thus lead to more accurate bids in the day-ahead power market, rather than CCAs relying on outdated data or forecasts that deviate significantly from the meter data to make procurement decisions. Ultimately, this improvement would reduce both over- and under-procurement risks and would bolster both reliability and affordability for the system and for customers.[30]

- SDCP's DERMS platform includes a load forecasting tool, which is currently fed meter data lagging by three days after power flow. This lag decreases the accuracy of forecast data and reduces the ability to respond to acute and transient, near-term swings in demand. With aggregated interval meter data access at parity with that of SDG&E (i.e. at 9:00 AM the morning after power flow), SDCP could re-run dispatch optimization

[27] SD CCA Opening Testimony at 26.

[28] *Id.* at 30.

[29] *Id.* at 41.

[30] *Id.* at 42.

> each morning, or on a more frequent basis, against the prior day's actual load, rather than a three-day-old snapshot.[31]

These examples are only a few of the numerous instances in which the SD CCAs describe their need for and intended plans for use of the real-time interval meter data that they are seeking in this proceeding. None of the uses in this section are relevant to this proceeding or within the scope of this proceeding.

5. *The SD CCAs' use of data request responses from the Smart Meter 2.0 proceeding are misleading and out of context*

SDG&E argued at the Prehearing Conference in this proceeding that the issue of data access should not be considered in this proceeding for numerous reasons, including the fact that it was already scoped into the Demand Response OIR, which creates the potential for inconsistent decisions on the same issue, but also because it is a waste of ratepayer resources. The SD CCAs inclusion of irrelevant testimony regarding all of the potential uses of real-time interval meter data outside of DF generation rates illustrates SDG&E's previous point. The SD CCAs waste intervenor, utility, and Commission time, and therefore ratepayer resources, by making these irrelevant arguments in a proceeding in which they are *obviously* not scoped in. Further, given that SDG&E provided the data they sought in the last Real Time Pricing application, A.21-12-006, and the weakness of their argument on the relevance of the data to their DF rate proposal, their attempt to deflect and distract is clear and inappropriate.

The SD CCAs' use of data request responses from SDG&E's Smart Meter 2.0 application is similarly inappropriate and wasteful. In addition to addressing these issues in the Demand Response OIR, and the more limited issue of data access for purposes of DF rates here, the SD CCAs are seeking to litigate data access in the Smart Meter 2.0 application and asking many of

[31] *Id.* at 43-44 (internal citations omitted).

the same data access questions in this proceeding as well as the Smart Meter 2.0 proceeding. This is a wasteful exercise and one made more wasteful by the SD CCAs attempts to introduce data request responses from the Smart Meter 2.0 proceeding into this proceeding. Their attempts to do so are misleading.

The SD CCAs cite to SDG&E Smart Meter 2.0 data request responses to support their arguments that SDG&E has "admitted" that interval meter data is "necessary" for their DF rates, and that SDG&E has an unfair competitive advantage by using interval meter data in their DF rates when the SD CCAs do not have such access.[32] The SD CCAs attempt to use these data request responses as a "gotcha" moment, seeking to portray SDG&E as having been caught speaking out of both sides of its mouth. This is untrue.

First, the SD CCAs use only part of SDG&E's response. The full question and response are as follows:

> **SD CCAs to SDG&E 2.5.**
>
> Please describe how the absence of advanced metering infrastructure makes dynamic rate programs less effective and, as a consequence, can lead to customers becoming dissatisfied. If SDG&E disagrees, please explain the reasons why.
>
> **SDG&E Response to Question 2.5:**
>
> SDG&E understands this question to be a follow-up to Question 10 of SDCP/CEA Data Request No.1, which refers to the background discussion of the role of Smart Meter (SM) 1.0 technology in current utility operations set forth in Witness S. Butler's testimony (Ex. SDG&E-02) at Page 5, Lines 6-7 ("Absent [SM 1.0] advanced metering infrastructure, core utility functions become inefficient and customer dissatisfaction more likely"). In connection with dynamic rate programs, SM 1.0 advanced metering technology enabled access to the interval consumption data that is necessary to support dynamic or time-of-use (TOU) rate calculations. The absence of advanced metering infrastructure and a return to manual meter reads would create significant delay in availability of consumption data and would

[32] *See id.* at 43 and 63 (citing to A.25-12-012, SDG&E Response to SDCP/CEA DR 2.5, attached to the SD CCA testimony as Exhibit D at 6).

> interfere with the availability of the granular data needed for dynamic or TOU rate calculations.[33]

SDG&E underlines the context that was misleadingly omitted from the SD CCAs' recitation of the data request response. Not only is the omission of this information misleading, but it is also misleading for the SD CCAs to attempt to introduce data request responses from another proceeding without including the other responses referenced therein and without including the testimony referenced therein.

However, upon tracking down the omitted data request response and reviewing the omitted testimony, it becomes clear that—with the appropriate context—SDG&E is referencing use of non-real-time interval meter data used for billing rate calculations, not real time interval meter data used to design dynamic rates. As stated in its response to the omitted data request 10 of SDCP/CEA Data Request No.1, SDG&E defined "core utility functions" as used in that testimony as referring to "metering, billing and customer services activities."[34] Accordingly, SDG&E was referring to *billing* rate calculations when it was using the term "rate calculations" in the incomplete data request response. SDG&E was not referring to rate design. Thus, when SDG&E responded that "interval consumption data [ ] is necessary to support dynamic or time-of-use (TOU) rate calculations[,]" the rate calculations it is refencing are billing calculations. With this context, the SD CCAs' conclusion that SDG&E has "admitted" that real time interval meter data is necessary for a DF rate collapses.

This attempt by the SD CCAs' to use data request responses from other proceedings is misleading. The SD CCAs have had ample time to seek data from SDG&E in this proceeding

[33] *Id.* at Exhibit D at 6 (emphasis added).

[34] *See* Attachment C hereto, SD CCA Data Request 001 in A.25-12-012, Question 10 and Response to Question at 15-16.

and could have sought clarification on what they perhaps considered an inconsistent statement. Instead, they selectively quoted SDG&E's response, omitting the context that explains it, to support their position rather than demonstrating that real-time meter data is necessary.

III. SDG&E COMPLIED WITH THE GUIDANCE DECISION IN ITS EFFORTS TO COLLABORATE WITH THE SD CCAS'

SD CCA and UCAN argue that SDG&E failed to sufficiently collaborate with the SD CCAs on the Proposed DF Rates in violation of D.25-08-049. SDG&E disagrees. The Guidance Decision states the following on the issue of collaboration:

> It is reasonable to require the Large IOU's DF Rate Proposals to include a detailed description regarding how the Large IOUs will collaborate with CCAs on various features of DF rates and DF rate programs, including but not limited to:
>
> > a. developing generation and distribution components and customer bill protection and management elements of DF rates, such as subscription design and transactive options;
> >
> > b. creating and launching LSE DF programs with IOU DF programs, to utilize lessons learned from IOU DF pilots and ME&O efforts and foster customer understanding of both bundled and unbundled DF rate offerings; and
> >
> > c. ensuring that LSE DF rates conform with CEC LMS requirements.[35]

As described in SDG&E's application, SDG&E collaborated with the SD CCAs via two pre-filing meetings, once on October 13, 2025 and again on January 7, 2026.[36] SDG&E attaches the PowerPoint slides from these two meetings here as Attachments D and E.[37] At no point during either of the pre-filing meetings did the SD CCAs seek to discuss meter data access, a need for more collaboration or requests to develop a collaborative framework, or cost recovery.

[35] D.25-08-049, Conclusions of Law (COL) 34 at 145-146.

[36] SDG&E Direct Testimony, Policy at 11-12.

[37] *See* Attachment D, PowerPoint presented at October 13, 2025 meeting; Attachment E, PowerPoint presented at January 7, 2026 meeting.

And at the time of those meetings, SDG&E was aware that the SD CCAs had communicated to the CEC that they were not actively designing DF generation rates and nothing communicated during those meetings changed SDG&E's understanding that the SD CCAs were not designing, or planning on designing, DF generation rates in the near term.

After filing, SDG&E and CEA met on June 5, 2026, to discuss CEA's CEC LMS compliance plan filing where they stated that they would be implementing DF rates.[38] CEA was not prepared to discuss any specifics or details about their rate design or implementation. SDG&E subsequently issued a data request to the SD CCAs on July 28, 2026, regarding their potential rates and need for data access, at which point the SD CCAs largely objected to SDG&E's requests as unduly burdensome because the SD CCAs were drafting their testimony due on September 11, 2026.[39] SDG&E and SDCP met on August 19, 2026, to discuss questions and comments that SDCP had regarding SDG&E's generation DF rate component. SDCP did not include discussion on any of the substantive issues from their intervenor testimony, such as meter data access, a collaborative framework, or cost recovery on the agenda to collaborate on or discuss. During these meetings, the SD CCAs did not communicate anything other than understanding and acceptance of SDG&E's design decisions.

A. The Requirement for Collaboration in the Guidance Decision Is Premised on the SD CCAs Offering a DF Generation Rate

The SD CCAs and UCAN argue that the Guidance Decision required SDG&E to seek input on its Proposed DF Rate design despite the fact that the SD CCAs had no plans to offer a

[38] CEC Docket: 23-LMS-01, CEA LMS Compliance Plan, 4/30/2026 at 12, "CEA plans to participate in and offer SDG&E's Real Time Pricing Pilot rates to eligible CEA customers once the pilot is implemented." Note that CEA filed a revised compliance plan 5/11/2026.

[39] *See* Attachment F, SD CCA Response to SDG&E DR 01.

concurrent DF generation rate.[40] The language of the Guidance Decision, and common sense, do not support this interpretation.

The operative Conclusion of Law regarding collaboration with the CCAs references, numerous times, that collaboration should occur on "DF rate *programs*," "developing generation and distribution rate *components,"* "creating and launching [CCA] DF programs *with* IOU DF programs," and "ensuring that [CCA] DF rates conform with CEC LMS requirements."[41] This language demonstrates a clear presumption that the SD CCAs will be developing/offering DF rates at the same time the IOU is developing/offering DF rates. Thus, the Guidance Decision should be interpreted as requiring development of a DF rate as a prerequisite to collaborate.

Moreover, UCAN and the SD CCAs' interpretation of this provision is unreasonable. Pursuant to their argument, the SD CCAs should be able to influence SDG&E rate design and rate implementation on DF distribution rate simply because it impacts unbundled customers. But impact on SD CCA customers alone is not sufficient rationale to require collaboration. Unbundled customers are SDG&E's customers as well as the SD CCAs customers and the SD CCAs should not be permitted a "say" in SDG&E rates just as SDG&E is not permitted a "say" in SD CCA rates. The Guidance Decision collaboration requirement is limited to the concurrent development and implementation of DF rates and is meant to increase the impacts of those requirements by the coordinated rollout. Without CCA participation in a DF generation rate, the Guidance Decision coordination requirement no longer serves this purpose and therefore should

[40] *See, e.g.,* SD CCA Opening Testimony at 98 (citing to "lack of meaningful coordination between SDG&E and the SD CCAs in the development, testing, and deployment of SDG&E's Proposed DF Rates, in violation of Commission orders."); UCAN Opening Testimony at 11-15.

[41] D.25-08-049, COL 34 at 145-146 (emphasis added).

not apply. Accordingly, given the SD CCAs stated intention not to create a DF generation rate, SDG&E's collaboration efforts were sufficient.

Additionally, SDG&E notes that collaboration is a two-way street. SDG&E made efforts to collaborate, but without reciprocal efforts by the SD CCAs, the SD CCAs should not be permitted to cry foul for a lack of alleged collaboration. If the SD CCAs are in fact interested in developing and implementing a DF generation rate, SDG&E will welcome those efforts and assist in developing a more detailed framework for future collaboration and rollout of that rate.

B. The SD CCAs' Proposal to Reject SDG&E's Application Absent Additional Collaboration or Absent Additional Data Access Should Be Denied

The SD CCAs argue that the Commission should condition approval of SDG&E's Application on both additional data access and on additional collaboration with the SD CCAs on SDG&E's Proposed DF Rates.[42] The Commission would be remiss in rejecting SDG&E's just and reasonable rate proposal for either reason. The SD CCAs initially argued that they could not propose a DF generation rate until they had data two days after power flow. They currently argue that they need real-time or near real-time data access to propose a DF generation rate. They further argue (erroneously) that "[b]ecause the SD CCs serve approximately 80 percent of electric load within SDG&E's service territory, meaningful collaboration is essential to effective rate design, program development, ME&O, technology integration, billing implementation, evaluation, and continuous improvement."[43] The SD CCAs serve approximately 80% of SDG&E customers, not 80% of load. But regardless, the SD CCAs argue that SDG&E's Application should be rejected or conditioned on structured coordination and collaboration with the SD CCA's through both design and implementation of the rate despite the SD CCAs failing

[42] SD CCA Opening Testimony at 125-131.

[43] *Id.* at 130-131.

to identify any deficiencies in SDG&E's proposals in its 131 pages of testimony. Similarly, when SDG&E met with the SD CCAs to discuss rate design and implementation, no issues were raised.

Finally, and importantly, the SD CCAs and UCAN state that one of the barriers to CCA participation is the lack of an SDG&E DF pilot or rate.[44] The SD CCAs are waiting for the results of SDG&E's implementation and rollout before running their own DF program. Thus, it is clear that the SD CCAs do not intend to offer a DF generation rate until after SDG&E implements its rate and the SD CCAs can use SDG&E's rate to determine whether it is cost-effective for the SD CCAs. Even if the Commission grants the SD CCAs access to interval meter data and even if SDG&E is ordered to collaborate with the SD CCAs, they have stated that they will not even consider a DF generation rate for their customers until SDG&E has results from its Proposed DF Rate. Since the SD CCAs claim that the lack of an SDG&E pilot or rate is a barrier and therefore SDG&E's application should be rejected, it's unclear how the SD CCAs ever expect SDG&E to have a DF rate that they can observe the results for.

IV. RATE DESIGN AND REVENUE NEUTRALITY

A. SDG&E's Proposed MGCC Appropriately Balances Price Signals And Is Supported By Cal Advocates

Although acknowledging that SDG&E's "rate design can reasonably be expected to produce load-shifting benefits,"[45] UCAN argues that SDG&E should have used the higher 2024 Avoided Cost Calculator (ACC) value, which UCAN argues would strengthen the capacity price

[44] *Id.* at 13 ("To date, the SD CCAs have not offered their own dynamic generation rates to their customers because the necessary foundational elements for effective implementation are currently not in place. In particular, SDG&E has not implemented a dynamic import rate pilot in its territory . . ."); *seealso id.* at 104; UCAN Opening Testimony at 13 "each CCA identifies technological barriers as well as a lack of data from SDG&E's DF pilot as hindrances to deploying their own DF rates."

[45] UCAN Opening Testimony at 3.

signal.[46] UCAN argues that SDG&E's "weaker price signal could result in less peak-period load shifting than would occur under the higher ACC value . . ." using SDG&E's proposed methodology.[47] SDG&E does not disagree with UCAN that its MGCC value is lower and or that the lower value may lead to less load shifting during peak hours; however, SDG&E believes that too high an MGCC value could mute the price signal from the Marginal Energy Cost or other DF rate components and lead to customer load shifting *only* during peak hours.[48] Not only could this create an over-reliance on the Top 150 hours MGCC adder mechanism if customers limit load shifting to peak hours where the MGCC adder is applied, but such customer behavior would also skew revenue collection to on-peak summer hours, negatively impacting revenue collection stability.[49]

Increasing the MGCC, per UCAN's recommendation, would lower the EPMC factor thereby lowering the Marginal Energy Costs (MEC). This would result in the MEC providing diluted price signals, which would mean customers would be more likely to only respond to the MGCC price signal when it is applied. One of the goals of DF rate design is to have accurate price signals that capture marginal costs,[50] and SDG&E believes that using UCAN's proposed MGCC (the 2024 ACC value) would create a DF rate that overcollects MGCC or overcollects during peak periods and undercollects otherwise.

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[46] *Id.* at 10.

[47] *Id.*

[48] See Second Revised Prepared Testimony of Jeff DeTuri on behalf of San Diego Gas & Electric Company Chapter 2 - Commodity/Generation (June 17, 2026) (SDG&E Second Revised Testimony, Generation) at 6-7.

[49] *Id.*

[50] *See* SDG&E Direct Testimony, Policy at 15.

UCAN further argues that SDG&E's proposed MGCC is not authorized by the Guidance Decision because it fails to use the ACC value.[51] As SDG&E explained in its opening testimony, the Guidance Decision permits use of a utility's "settled MGCC values that were adopted by the Commission in their most recent General Rate Case (GRC) Phase 2 applications . . . ."[52] In SDG&E's most recent GRC Phase 2—in a settlement agreement that UCAN signed onto—the Commission adopted language specific to the MGCC for this very rate. The relevant term of the approved settlement agreement is as follows:

> Notwithstanding any term herein, and assuming compliance with the forthcoming Commission decision on dynamic rate guidelines in Track B of Rulemaking ("R") 22-07-005, SDG&E agrees that updated marginal commodity costs will be used for purposes of proposing a dynamic rate in compliance with Decision ("D.") 23-11-006. This will help ensure that dynamic rates are cost-based and rely on updated marginal costs. "Updated marginal commodity costs," for purposes of this provision, may be interpreted as meaning the use of the most recent Commission Integrated Resource Plan for battery energy storage capacity costs at the time of filing the dynamic rate application.[53]

Accordingly, the IRP-derived MGCC were the settled MGCC values in SDG&E's most recent GRC Phase 2, the IRP-derived MGCC values are also compliant with the Guidance Decision. This is a clear interpretation and one UCAN should be held to as a signing party to the 2024 GRC Phase 2 settlement agreement.

Cal Advocates was also a party to that settlement agreement discussed above and agrees with SDG&E that the use of the most recent IRP data is reasonable and using the ACC is not

[51] UCAN Opening Testimony at 10.

[52] SDG&E Second Revised Testimony, Generation at 3; *see also* D.25-08-049, COL 13 at 141.

[53] D.25-09-006 at Attachment A (Marginal Cost Settlement Agreement), Settlement Term 3.2.

appropriate.[54] The IRP derived battery storage costs were developed in January 2026, whereas the ACC available at the time of filing was adopted November 13, 2024.[55]

Moreover, regardless of the MGCC initially adopted, the Commission anticipated the potential for MGCC cost updates.[56] SDG&E will comply with the Guidance Decision and file annual MGCC cost updates. Accordingly, because SDG&E's proposed MGCC is justified and reasonable in the context of SDG&E's proposed rate design, compliant with the Guidance Decision, and supported or not opposed by any other intervenors in this proceeding, the Commission should reject UCAN's argument supporting use of the higher ACC value for purposes of the MGCC.

B. The Proposed DF Rates Are Revenue Neutral.

The SD CCAs and Cal Advocates express concern that the Proposed DF Rates will not be revenue neutral.[57] Neither intervenor offers any analysis or proof that the Proposed DF Rates are not revenue neutral despite SDG&E providing detailed bill impact workpapers. The fundamental principle behind DF rates is that as the customer can save by shifting their load out of high-priced hours, so too will the LSE save on their procurement costs because of having less load in high priced hours.[58] Neither intervenor refutes SDG&E's argument that the Proposed DF Rates are revenue neutral. What they argue, without analysis or support, is that there is some

[54] Cal Advocates Opening Testimony, Chapter 1 at 5.

[55] CPUC, DER Cost-Effectiveness, *available at:* https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/energy-efficiency/der-cost-effectiveness.

[56] D.25-08-049, Ordering Paragraph (OP) 4 at 146-147.

[57] SD CCA Opening Testimony at 11 and at 88 ("Because the impact across customer classes is uneven, revenue neutrality will largely depend on enrollment in the Proposed DF Rates across customer classes."). *See also* Opening Testimony in Response to San Diego Gas & Electric Company's Dynamic Rate Application (A.) 26-02-001 – Chapter 2 Implementation, Marketing, and Evaluations (September 11, 2026) (Cal Advocates Opening Testimony, Chapter 2 at 8-9.

[58] *See* SDG&E Direct Testimony, Policy at 16.

undefined chance that the rates might cause a cost shift. SDG&E designed the Proposed DF Rates to be revenue neutral by incorporating the Equal Percent of Marginal Costs (EPMC) factor to ensure that the rate is developed to collect SDG&E's full authorized revenue requirement.[59] This is consistent with the methodology used for non-DF rates and adopted by the Commission for that purpose for those rates. There is no reason introduced by the SD CCAs or Cal Advocates that the EPMC methodology is not appropriate for DF rates.

Moreover, because the Proposed DF Rates are based on day-ahead pricing rather than forecasted procurement costs, they are even more likely than non-DF rates to be revenue neutral. The current costs associated with the rate will be reflected in the rates much sooner for DF rates (the day before) than for non-DF rates which are updated to reflect differences between the forecast and actual costs at the annual rate update cycle. Accordingly, the SD CCAs' and Cal Advocates' concerns regarding revenue neutrality should carry no weight.

V. REVENUE REQUIREMENT POLICY

Cal Advocates argues that SDG&E is not entitled to a revenue requirement for its Proposed DF Rates on a number of grounds. SDG&E addresses those arguments herein. SDG&E notes that it is rebutting these arguments in its Policy testimony rather than its Revenue Requirement testimony. SDG&E's Revenue Requirement testimony addresses the technical and mechanical aspects of SDG&E's request for revenue requirement, not the issue of whether SDG&E is entitled to a revenue requirement at all. Accordingly, SDG&E is addressing herein arguments related to whether and why SDG&E is entitled to recover costs (i.e. revenue requirement) associated with this rate. Rebuttal associated with the proposed direct costs for

[59] SDG&E Second Revised Testimony, Generation at 10.

billing, ME&O and EM&V are included in the Implementation, ME&O and EM&V rebuttal testimony chapters.

A. SDG&E Is Entitled to Costs Associated with the Proposed DF Rates

As an initial matter, SDG&E is entitled to revenue requirement associated with its reasonable costs expended in implementing the Proposed DF Rates. These are incremental costs that SDG&E would not have otherwise incurred but for the Commission's order in D.25-08-049. SDG&E has not requested the costs associated with the Proposed DF Rates in any other proceeding.

Further, SDG&E's Proposed DF Rates were designed in compliance with D.25-08-049, which ordered SDG&E to "file one consolidated application that proposes demand flexibility rates for all customer classes [except streetlighting] to comply with California Energy Commission Load Management Standard requirements within 90 days of the issuance of this decision[,]" and in compliance with the guidance provided in the Decision.[60] Notably, the CEC LMS regulations explicitly permit recovery of program costs. The relevant language is as follows:

> In its rate applications, each Large IOU shall seek to recover the full costs associated with conducting each program required by this article from the class of customers which the program most directly affects. The Large IOU shall not be required to commence implementation of any program required by this article until the Large IOU's rate-approving body has approved the tariffs which are a part of any such program and a method for recovering the costs of the program. This does not affect any obligations Large IOUs have under Section 1623(b).[61]

[60] D.25-08-049 at OP 1.

[61] 20 Cal. Code of Regs. § 1621(g).

B. SDG&E Is Entitled To Costs Associated with Commission-Ordered Work Regardless of Whether SDG&E Agrees with Commission Policy

Cal Advocates argues that a total disallowance of SDG&E's requested revenue requirement is warranted because SDG&E stated that it "'does not believe this proposal represents the most cost-effective or prudent use of Commission or SDG&E resources' due to ratepayer affordability challenges."[62] Cal Advocates further argues that because the SD CCAs' are not participating, granting SDG&E revenue requirement would be "an imprudent use of ratepayer funds, risks creating stranded assets, and would not be just and reasonable."[63] Giving Cal Advocates a generous benefit of the doubt, SDG&E could conclude that Cal Advocates is suggesting that the Commission should not adopt a DF rate at all and therefore no revenue requirement is required. However, if Cal Advocates is suggesting that SDG&E is not entitled to revenue requirement because SDG&E does not agree with Commission policy or because of the actions of an entity over which SDG&E has no control, SDG&E is very concerned with Cal Advocates' understanding of the regulatory compact and of SDG&E's First Amendment rights. A discussion of the regulatory compact is included in D.20-01-002 and elaborates on the balance of ratepayer and utility interest present in every rate case, including the present one.[64] But an important element of that contract is that "the utility is provided the opportunity to recover its actual legitimate or prudent costs—determined by a public examination of the utility's outlays—plus a fair return on capital investment… ."[65] SDG&E is not required to agree with Commission policy or Commission decisions in order to be entitled to reasonable revenue requirement.

[62] Cal Advocates Opening Testimony, Chapter 3 at 2.

[63] *Id.* at 3.

[64] D.20-01-002 at 9-12.

[65] *Id.* at 10.

Similarly, the decisions of the SD CCAs are irrelevant in determining whether SDG&E is entitled to revenue requirement. Accordingly, the Commission should reject Cal Advocates' request for total disallowance as illegal and inappropriate.

C. Cal Advocates' Argument That SDG&E Should "Reallocate Existing Authorized Funding" to Implement the Proposed DF Rates Deprives SDG&E of Its Reasonable Opportunity To Recovery Its Costs and a Return on Investment

Cal Advocates argues that "[i]f the Commission decides to adopt a dynamic rate in this proceeding, it should not authorize new incremental funding to SDG&E."[66] Cal Advocates' position rests not on the argument that SDG&E's costs are not incremental, but rather that "SDG&E fails to show that existing authorized funding . . . cannot be reallocated."[67] Establishing that costs cannot be reallocated is not the applicable standard of review for revenue requests. SDG&E need only establish that its request is incremental—i.e. that it is not a cost or activity that has previously been funded—and that the cost is reasonable.[68] Cal Advocates does not cite to any case law or precedent establishing their proposed standard of review and the Commission should reject this proposal outright.

Again, the regulatory compact and utility's right to receive revenue requirement for legitimate, incremental costs is well established.[69] The costs awarded to SDG&E in its GRC Phase 1 are for activities litigated in the GRC Phase 1 and costs forecasted for those activities include an opportunity for SDG&E to earn a reasonable return. Requiring SDG&E to reallocate costs for activities not forecast therein effectively deprives it of an opportunity to earn its rate of

[66] Cal Advocates Opening Testimony, Chapter 3 at 10.

[67] *Id.*

[68] D.20-01-002, *Decision Modifying the Rate Case Plan for Energy Utilities,* at 10 (citing the utility's right to receive actual legitimate or prudent costs plus a fair return).

[69] *Id.*

return. Further, such a suggestion fails to acknowledge that there is no logical end to such a requirement. Cal Advocates suggests that it should be able to seek an accounting of all GRC revenue at any time and to the extent there are any shareholder returns, those amounts could be and should be reallocated to incremental activities, regardless of whether the activity is incremental and regardless of where in the GRC cycle SDG&E is.[70] This lacks any legal basis. Cal Advocates' attempts to deprive SDG&E of incremental costs should be denied.

Cal Advocates' further makes the following argument:

> The Commission should order SDG&E to use previously authorized funds and present any truly incremental demand flexibility request in its next GRC Phase I application. For EM&V specifically, the Commission should require SDG&E to repurpose funding previously authorized in D.23-11-006 for the DERP. Since the pilot has no participants, it cannot have performed the bulk of its forecasted evaluation work, and approximately $501,259 should remain available for reallocation.[71]

Again, this argument seemingly evidences a significant misunderstanding of utility ratemaking. With respect to the first sentence, the issue of using previously authorized funds is addressed above, but the sentence also argues that incremental funds be requested in SDG&E's next GRC Phase 1. Playing out this position, given that SDG&E is in the middle of its Test Year 2028 GRC, Cal Advocates is suggesting that SDG&E include incremental costs associated with this rate in its Test Year 2032 GRC.[72] Thus, in order to avoid retroactive ratemaking, SDG&E would not be able to incur any incremental costs associated with this rate until 2032, assuming such

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[70] Cal Advocates Opening Testimony, Chapter 3 at 9.

[71] *Id.* at 10.

[72] SDG&E notes that this is not a mere misunderstanding of where SDG&E was in its GRC cycle. Cal Advocates issued numerous data requests about SDG&E's revenue request and why it was not included in SDG&E's GRC. In its responses to those requests, SDG&E clarified that it was seeking revenue requirement for this rate in this application rather than its Test Year 2028 GRC due to a number of timing issues, namely that the rate design and therefore costs associated with the rate were as yet undecided and therefore insufficiently certain for inclusion in the GRC that was filed in June 2026. Cal Advocates Opening Testimony, Chapter 3, Appendix B at 26-29.

costs were approved. This is unreasonable and contrary to the intentions of the Commission in ordering SDG&E to design and implement a DF Rate.

Cal Advocates also argues that the Commission should "repurpose funding previously authorized in D.23-11-006 for the DERP."[73] This testimony misunderstands the ratemaking mechanism adopted. D.23-11-006 found the estimates for EM&V to be reasonable, but did not authorize funding.[74] Instead, D.23-11-006 authorized a memorandum account, pursuant to the approved Settlement Agreement.[75] Thus, SDG&E was authorized to track its EM&V costs associated with the Export Compensation Rate and record them in a memorandum account to be reviewed for recovery, subject to a reasonableness review, at a later time.[76] Accordingly, Cal Advocates is mistaken that there are funds that were previously approved and authorized that can be "repurposed" for this rate, and Cal Advocates' statement to the contrary is a misrepresentation of law and fact.

D. Cal Advocates' Policy Opinion That the Commission Should Not Approve Single-Issue Ratemaking Revenue Requests Is Not Commission Policy

Cal Advocates argues that "the Commission should reject SDG&E's attempt at single-issue ratemaking[]" because "this type of multi-year funding belongs in a GRC, where it can be scrutinized against SDG&E's total authorized revenue requirement."[77] The Commission is addressing the issue of whether and when single-issue ratemaking applications are warranted in

[73] Cal Advocates Opening Testimony, Chapter 3 at 10.

[74] D.23-11-006, Conclusions of Law 9-10; A.21-12-006/008 (cons.), Joint Motion for Adoption of Settlement Agreement on Application A.21-12-008 Regarding Export Compensation Rate Pilot (June 9, 2023) at Attachment A, Section 3.8 of the Settlement Agreement ("Costs related to implementation will be recorded in a newly-created Real Time Pricing Memorandum Account ("RTPMA"). The RTPMA will not have a cost cap. All costs recorded in the RTPMA will be subject to reasonableness review in a future application or testimony submitted by SDG&E.").

[75] *Id.*

[76] *Id.*

[77] Cal Advocates Opening Testimony, Chapter 3 at 10 (citation omitted).

the open Rate Case Plan Order Instituting Rulemaking, (R.) 26-09-003.[78] Cal Advocates can present its policy arguments on the issue in that proceeding, but it would be inappropriate for the Commission to implement such a policy in a situation like this one where there was no notice to SDG&E of a requirement to file in its GRC. Additionally, SDG&E was specifically required to file this application outside of the General Rate Case and on a schedule inconsistent with the General Rate Case.[79] Accordingly, Cal Advocates' suggestion that SDG&E should have filed for recovery of the costs associated with this rate in its GRC or wait to file for recovery of costs in its next GRC is unreasonable.

VI. CONCLUSION

The Commission should approve SDG&E's proposed demand flexibility rates and reject requests to condition their implementation on additional meter-data access requirements. SDG&E has engaged with the SD CCAs regarding demand flexibility rate development and remains willing to continue that collaboration, including through scheduled meetings addressing specific design and implementation issues. Continued coordination can proceed alongside implementation rather than serve as a condition that delays this application. The Commission should also retain SDG&E's proposed IRP-derived marginal generation capacity cost methodology, which this testimony explains is consistent with its applicable marginal cost framework and uses the more current cost inputs available at filing.

This concludes my rebuttal testimony.

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[78] *See* R.26-09-003, Order Instituting Rulemaking to Revise the General Rate Case Plan for Energy Utilities (September 11, 2026) at 18 (adopting the preliminary scoping issue of "Whether guidance should be provided, or minimum threshold requirements adopted, for addressing standalone cost recovery and/or infrastructure applications that occur outside the GRC process.").

[79] *See* D.25-08-049 at OP 1 (requiring SDG&E to file this Application within 90 days of the guidance decision).

ATTACHMENT A

SDG&E Response to Cal Advocates Data Request 023

CAL ADVOCATES DATA REQUEST 023
SDG&E DEMAND FLEXIBILITY RATES APPLICATION - A.26-02-001
SDG&E RESPONSE
DATE RECEIVED: OCTOBER 7, 2026
DATE RESPONDED: OCTOBER 12, 2026

OBJECTIONS TO INSTRUCTIONS

1. SDG&E objects to the instructions to the extent they purport to require verified responses.
2. SDG&E objects to the instructions to the extent they purport to require the individual(s) responsible for providing the response and/or designate the proper witness to cross-examine concerning the response. The responses reflect SDG&E's response as a Company to the requests and not the work of any one individual.
3. SDG&E objects to the instructions to the extent they state that the requests are ongoing in nature and require subsequent, supplemental information.
4. SDG&E objects to the instructions to the extent they request responses in multiple formats.
5. SDG&E objects to the instructions to the extent they provide shortened timelines for objections and requests for clarification.

EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.
2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.
3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.
4. These responses are made solely for the purpose of this proceeding and for no other purpose.

Subject to the foregoing objections and reservations, SDG&E responds as follows.

CAL ADVOCATES DATA REQUEST 023
SDG&E DEMAND FLEXIBILITY RATES APPLICATION - A.26-02-001
SDG&E RESPONSE
DATE RECEIVED: OCTOBER 7, 2026
DATE RESPONDED: OCTOBER 12, 2026

Question 1(a):

San Diego Community Power and Clean Energy Alliance (Joint CCAs) repeatedly assert they are unable to implement dynamic rates due to the lack of real time, customer load data. For example, the Joint CCAs state "Without data parity, CCAs [Community Choice Aggregators] cannot implement and administer effective dynamic offerings or provide comparable dynamic rates to their customers."[1]

a. Did SDG&E develop its proposed dynamic generation rates using customer usage data available prior to 33 hours after power flow through the customer meter?[2]

i. If yes, please explain whether SDG&E's marginal energy cost (MEC) or marginal generation capacity cost (MGCC) rate components include this data and how SDG&E incorporated the customer usage data available prior to 33 hours after power flow to develop the rate components.

SDG&E Response to Question 1(a):

No, SDG&E did not use real-time or near real-time customer usage data to develop the proposed dynamic generation rates and does not anticipate using real-time or near real-time customer usage data to develop dynamic generation rates in the future.

SDG&E Response to Question 1(a)(i):

Not applicable.

[1] Prepared Direct Testimony on Behalf of San Diego Community Power and Clean Energy Alliance in San Diego Gas & Electric Company's Application for Approval of Demand Flexibility Rates (Joint CCA Opening testimony), September 11, 2026, at 16, lines 18-20.

[2] 2 Note, the Joint CCA's assert customer usage data available to SDG&E up to 33 hours after the electricity flow through the meter is available for "possible access by SDG&E's 'energy procurement function'." Joint CCA Opening testimony, Table 1: SDG&E Customer Interval Meter Data Availability Timeline at 47.

Question 1(b):

San Diego Community Power and Clean Energy Alliance (Joint CCAs) repeatedly assert they are unable to implement dynamic rates due to the lack of real time, customer load data. For example, the Joint CCAs state "Without data parity, CCAs [Community Choice Aggregators] cannot implement and administer effective dynamic offerings or provide comparable dynamic rates to their customers."

b. Did SDG&E use publicly available data from the California Independent System Operator (CAISO) or is the input data publicly accessible (such as on the CAISO OASIS website) to develop its dynamic MEC component of its generation rate?

i. If yes, please provide the source of the data.

SDG&E Response to Question 1(b):

SDG&E used both publicly available data to develop its MEC component as well as a generation marginal cost study developed as part of this proceeding.

SDG&E Response to Question 1(b)(i):

The MEC component consists of three components—the hourly energy price, the Distribution Loss Factors (DLF), and the Equal Percent of Marginal Cost (EPMC).

The hourly energy prices of the proposed MEC are the Day Ahead Market (DAM) hourly energy prices. These prices are located on the CAISO OASIS website.

The DLF formulas are publicly available from SDG&E.com tariffs. These formulas are used with the publicly available CAISO system load forecast, also located on the CAISO OASIS website.

SDG&E developed a generation marginal cost study specific to this proceeding for purposes of developing the Equal Percent of Marginal Cost (EPMC) applied to the MEC. However, SDG&E does not anticipate needing a cost-study specific to this rate on a going forward basis. SDG&E expects to use the EPMC approved in its cyclical GRC Phase 2 filing; however, due to the specifics of its 2024 GRC Phase 2, a different cost study was required for this proposal.

Question 1(c):

San Diego Community Power and Clean Energy Alliance (Joint CCAs) repeatedly assert they are unable to implement dynamic rates due to the lack of real time, customer load data. For example, the Joint CCAs state "Without data parity, CCAs [Community Choice Aggregators] cannot implement and administer effective dynamic offerings or provide comparable dynamic rates to their customers."

c. In SDG&E's opinion, is access to customer usage data, available prior to 33 hours after power flow, necessary to develop Load Management Standard compliant, dynamic, generation rates? Please explain.

SDG&E Response to Question 1(c):

No. In SDG&E's opinion it's not necessary to use real-time or near real-time customer usage data to develop an LMS-compliant dynamic generation rate. SDG&E did not use this type of data to develop its own dynamic generation rate.

Question 2(a):

SDG&E proposes to add an MGCC premium to its hourly generation rate when a particular hour would exceed the Top 150 hours threshold.[3]

a. Please provide a narrative describing SDG&E's process for determining whether a particular hour will exceed the Top 150 hours threshold.

SDG&E Response to Question 2(a):

SDG&E will use a three year average of CAISO system load for the SDG&E TAC area. This data is publicly available on the CAISO OASIS website at CAISO OASIS System Demand > CAISO Demand Forecast for the market/process of ACTUAL. The three years will be determined by the latest three calendar years that have a full year's worth of data available. SDG&E will sort each year and take the load from the 150th highest load hour for each year. These three loads will then be averaged. If any hourly DAM market load forecast (sourced from CAISO OASIS System Demand > CAISO Demand Forecast, for the SDG&E TAC area) exceeds the averaged top 150th load then the MGCC will be applied to that hour.

[3] SDGE-04-2R, at 5 lines 3-10.

Question 2(b):

SDG&E proposes to add an MGCC premium to its hourly generation rate when a particular hour would exceed the Top 150 hours threshold.

b. In general, how far in advance does SDG&E make a determination on whether a particular hour meets or exceeds the Top 150 hours threshold? For example, does SDG&E make this determination an hour ahead, a day ahead, a week ahead?

SDG&E Response to Question 2(b):

As long as the data is available on the CAISO OASIS website, SDG&E will make this determination a day ahead.

Question 2(c):

SDG&E proposes to add an MGCC premium to its hourly generation rate when a particular hour would exceed the Top 150 hours threshold.

c. Is customer usage data available prior to 33 hours after power flow necessary to make the determination on whether a future hour meets the Top 150 hours threshold?

SDG&E Response to Question 2(c):

No.

ATTACHMENT B

SD CCA Response to SDG&E Data Request 02

San Diego Community Power and Clean Energy Alliance Response to
San Diego Gas and Electric Company Data Request No. SDGE-CEA-DR-02
Application 26-02-001

Requesting Party:	San Diego Gas and Electric Company ("SDG&E")
Responding Parties:	San Diego Community Power ("SDCP" or "Community Power") and Clean Energy Alliance ("CEA," and, collectively, the "SD CCAs")
Requester:	Tyler Kirchhoff, Regulatory Case Manager Phone: 619-676-3898 E-Mail: tmkirch2@sdge.com Rebecca Hansson, Senior Counsel Phone: 619-550-7069 E-Mail: rhansson@sdge.com
Responder:	Sheridan Pauker, Partner Keyes & Fox LLP Phone: (510) 314-8202 E-mail: spauker@keyesfox.com Counsel for SD CCAs
Request Date:	September 30, 2026
Date Sent:	October 14, 2026

GENERAL OBJECTIONS

1. The SD CCAs object to the instructions and definitions in SDGE-CEA-DR-02 (the "Requests") to the extent they supplement, modify, or exceed the scope of the requirements of Article 10 of the Commission's Rules of Practice and Procedure, applicable Assigned Commissioner or Administrative Law Judge's rulings, or the procedural schedule governing this proceeding. The SD CCAs do not waive, and expressly preserve, all rights to limit their responses to information that is properly discoverable under Commission Rules.

2. The SD CCAs object to the Requests to the extent they seek information or documents protected as a confidential attorney-client communication and/or attorney work product or are otherwise confidential, proprietary or sensitive data, trade secrets and information.

3. The SD CCAs object to the Requests to the extent they request legal conclusions, legal contentions, strategic judgments, or internal deliberative analyses or opinions rather than facts, and are therefore not a proper subject for discovery and may be protected as a confidential attorney-client communication or by the attorney work product doctrine.

4. The SD CCAs object to the Requests to the extent they are overbroad, unduly burdensome, or disproportionate to the needs of this proceeding, including Requests that seek information not reasonably calculated to lead to the admission of discoverable evidence or that would require unreasonable effort or expense to respond.

5. The SD CCAs object to the Requests as unduly burdensome to the extent they seek information that has already been provided in the SD CCAs' testimony on the same subject.

6. The SD CCAs object to the Request as unduly burdensome to the extent they require the SD CCAs to compile and produce materials that are already publicly reported and equally accessible to the requesting party.

7. The SD CCAs object to the Requests to the extent they impose obligations that exceed Commission procedural requirements, including, but not limited to, requests that:

a. Require the creation of new analyses, studies, summaries, or compilations not otherwise maintained in the ordinary course of business;

b. Seek narrative explanations, justifications, or legal analyses beyond what is required by Commission Rules; and

c. Demand a level of detail or documentation not contemplated by the Commission's discovery framework.

8. The SD CCAs object to the Requests to the extent they are vague, ambiguous, or insufficiently specific as to subject matter, time period, or definitions, such that the SD CCAs cannot reasonably determine what information is requested.

By responding to any of these Requests, the SD CCAs do not concede the relevance, materiality, or admissibility of any information provided, nor do they waive any objection as to any other use of such information in this proceeding.

PRELIMINARY STATEMENT

The SD CCAs' responses to the Requests are made to the best of their present knowledge, information, and belief and subject to and limited by the objections herein. The SD CCAs have not concluded its investigation of the facts related to this proceeding. The following responses are, at all times, subject to such additional or different information as discovery or further investigation may disclose. Therefore, the following responses and objections are given without prejudice to the SD CCAs' right to rely on subsequently discovered or recalled information and evidence. The SD CCAs specifically reserve the right to make use of, or to introduce at any hearing, information and/or document responsive to the following requests that is discovered or recalled subsequent to the date of these responses, including, without limitation, any information or documents obtained in discovery or by further investigation of this matter. Capitalized terms not defined herein are defined in the Requests, the Application or SDG&E's testimony served in this Application.

REQUESTS & RESPONSES

Request 1

Do the SD CCAs plan to design LMS-compliant demand flexibility rates (i.e. commodity rates)?

> **a. If not, please describe all the reasons why the SD CCAs do not plan to design LMS-compliant demand flexibility rates.**
>
> **b. If yes, when do the SD CCAs plan to offer their customers LMS-compliant demand flexibility rates?**

Response 1

The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been requested and provided in the SD CCAs' prior discovery responses and/or testimony on the same subject. The SD CCAs object to this Request to the extent it requests legal conclusions, legal positions, strategic judgments, or internal deliberative analyses or opinions regarding the SD CCAs' compliance with applicable law and regulations relating to the LMS, rather than facts, and are therefore not a proper subject for discovery and may be protected as a confidential attorney-client communication or by the attorney work product doctrine. The SD CCAs further object to this Request to the extent it seeks information or documents protected as a confidential attorney-client communication and/or attorney work product or are otherwise confidential, proprietary or sensitive data, trade secrets and information. The SD CCAs further object to this request as unduly burdensome to the extent it seeks production of information that is already publicly reported and equally accessible to the requesting party.

Subject to and without waiving these objections, the SD CCAs respond as follows:

The SD CCAs refer SDG&E to their response to Data Request No. SDGE-CEA-DR-01, Response 1, and their intervenor testimony filed on September 11, 2026. As noted therein, the SD CCAs are actively engaged in A.26-02-001 to advocate on behalf of CCA customers with respect to the Proposed DF Rates. The SD CCAs seek to collaborate with SDG&E to resolve the SD CCAs' concerns regarding the Application as expressed in their Protest and forthcoming testimony in a satisfactory manner that serves their customers' interests.

Community Power has deferred the development of demand flexibility rates until foundational issues such as access to sufficiently timely and granular interval data, optimal coordination with SDG&E on customer education and outreach, collaboration with SDG&E on effective implementation, and others are in place.

Clean Energy Alliance similarly will defer the development of demand flexibility rates until the barriers and issues raised by the SD CCAs in their Protest and intervenor testimony in this case are addressed and CEA then has an opportunity to evaluate cost effectiveness, equity, technological feasibility, benefits to the grid, and benefits to customers of marginal cost-based rates for each customer class per the requirements of the LMS regulations. As discussed

extensively in the SD CCAs' intervenor testimony, data access and meaningful collaboration with SDG&E are necessary to inform CEA's evaluation of marginal cost-based rates as required under the LMS regulations. CEA is currently evaluating potential revisions to its LMS Plan to clarify the current barriers to implementation of marginal cost-based rates and its intention to reevaluate such rates following the outcome of the issues raised by the SD CCAs in this Application proceeding.

Request 2

How do the SD CCAs plan to use customer interval meter data for purposes of any future demand flexibility rate?

Response 2

The SD CCAs object to this request as unduly burdensome to the extent it seeks production of information that is already publicly reported and equally accessible to the requesting party. The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been provided in the SD CCAs' testimony on the same subject.

Subject to and without waiving these objections, the SD CCAs respond as a courtesy as follows:

The SD CCAs refer SDG&E to their response to Data Request No. SDGE-CEA-DR-01, Response 3, and their intervenor testimony, Chapter III(A) and (B), in A.26-02-001, filed on September 11, 2026. As discussed extensively and in detail in that testimony already provided, the SD CCAs view customer interval meter data as essential to implementation and ongoing evaluation of any demand flexibility rate. Interval data would support customer outreach and education. For example, when generation prices remain unusually high or low for multiple days, timely interval data could help identify how participating customers' usage interacts with those price signals. The SD CCAs would use that information to alert customers to sustained price conditions within an actionable timeframe, explain the potential bill impacts, and provide information regarding when customers may consider shifting their usage. This type of timely customer engagement is important to helping customers understand and respond to a demand flexibility rate. Without sufficiently timely data, customers may be more exposed to price shocks and market volatility, creating a risk of adverse customer experiences with demand flexibility rates. The SD CCAs' testimony also explains in detail how timelier access to interval data would improve their load forecasting processes. Interval meter data would support the ongoing administration and evaluation of a future demand flexibility rate. More timely data would allow the SD CCAs to react to real-time market conditions and customer usage and provide feedback to participating customers in an actionable manner.

Request 3

The SD CCAs state in their March 5, 2026 protest in the instant proceeding that "[t]he SD CCAs must ensure that they and their customers have access to granular, real-time interval usage data so that the CCAs, as load-serving entities, and their customers, which may take service under the Proposed DF Rates, can make the most of the state-mandated

DF programs."[11]

Response 3

The SD CCAs object to each of the sub-questions to Request 3 below as unduly burdensome as they seek production of information that is already publicly reported and equally accessible to the requesting party. The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been provided in The SD CCAs' testimony on the same subject. The SD CCAs refer SDG&E to their intervenor testimony filed on September 11, 2026, which addressed these questions in detail.

Subject to and without waiving these objections, which apply to each of the sub-questions to Request 3 below, the SD CCAs respond as a courtesy as follows:

Request 3(a)

a. What do the SD CCAs consider "real-time" in this context?

Response 3(a)

The SD CCAs refer SDG&E to their intervenor testimony filed on September 11, 2026, which defined "near real time" several times, including at pages 9:4-5, 16:1-2 and 36:17 – 37:3.

Request 3(b)

b. Using the SD CCAs definition of "real-time," how do the SD CCAs anticipate using the "granular, real-time interval usage data" to "make the most of the state-mandated programs"?

Response 3(b)

The SD CCAs refer SDG&E to their intervenor testimony filed on September 11, 2026, Chapter III, Sections (A) and (B), including, but not limited to, pages 34:8 – 35:2, 36:9-14; 38:9 - 40:4, 40:17 – 43:9.

Request 3(c)

c. Assuming the SD CCAs receive "granular, real-time interval usage data" (using the SD CCAs definition of "real-time" as described above), please describe how the SD CCAs plan to use the data to design a DF commodity rate.

[1] SD CCA Protest at 3.

Response 3(c)

See Response to Request 3(b).

Request 3(d)

d. Assuming the SD CCAs receive "granular, real-time interval usage data" (using the SD CCAs definition of "real-time" as described above), please describe how the SD CCAs plan to use the data to implement a DF commodity rate.

Response 3(d)

See Response to Request 3(b).

Request 3(e)

e. Assuming the SD CCAs receive "granular, real-time interval usage data" (using the SD CCAs definition of "real-time" as described above), please describe how the SD CCAs plan to use the data to provide a DF commodity rate on an on-going basis for SD CCA customers post-implementation.

Response 3(e)

See Response to Request 3(b).

Request 3(f)

f. Assuming the SD CCAs receive "granular, real-time interval usage data" (using the SD CCAs' definition of "real-time" as described above), please describe how the SD CCAs plan to use "real-time" customer interval usage data to assist customers with understanding their rates and managing their load.

Response 3(f)

See Response to Request 3(b).

Request 4

The SD CCAs state in their March 5, 2026 protest in the instant proceeding that the "lack of timely access to sufficient customer energy usage data meaningfully hinders CCA customer participation . . ."[2]

[2] SD CCA Protest at 9.

a. **Please describe the reasons why lack of timely access to sufficient customer energy usage data would hinder CCA participation in a DF rate?**

b. **Please specify which of these reasons would meaningfully hinder CCA customer participation in a DF rate?**

Response 4

The SD CCAs object to this request and each of its subquestions as unduly burdensome as they seek production of information that is already publicly reported and equally accessible to the requesting party. The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been provided in The SD CCAs' testimony on the same subject.

Subject to and without waiving these objections, the SD CCAs respond as a courtesy as follows:

The SD CCAs refer SDG&E to their intervenor testimony filed on September 11, 2026, which addressed these questions in detail in Chapter III(A), (B) and (C)(3).

Request 5

The SD CCAs' September 11, 2026 prepared direct testimony in this proceeding at page 30 states: "In the absence of timely customer usage information, the SD CCAs are unable to effectively assist customers in managing usage during periods of elevated prices."

a. **assuming access to "timely customer usage information," please state the actions the SD CCAs intend to take to assist customers on a CCA-offered DF rate.**

Response 5

The SD CCAs object to this request as unduly burdensome as it seeks production of information that is already publicly reported and equally accessible to the requesting party. The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been provided in The SD CCAs' testimony on the same subject.

Subject to and without waiving these objections, the SD CCAs respond as a courtesy as follows:

See Response to Request 3(b) above.

Request 6

The SD CCAs' September 11, 2026 prepared direct testimony in this proceeding at page 59 states: "The facts of the matter are such that without timely energy usage data, the SD CCAs can still communicate dynamic prices, but more than likely they will end up being incorrect signals to customers because CCAs are required to forecast what their marginal daily costs will be based on their day-ahead load." Do the SD CCAs plan to design an LMS-compliant DF generation rate with hourly rates based on their day-ahead load forecast?

a. If the SD CCAs' response is "yes," why are the SD CCAs planning to design their rate in that manner rather than using market rates?
Response: N/A

b. If the SD CCAs' response is "no," what do the SD CCAs mean when they say that "without timely energy usage data" they will likely end up sending "incorrect signals to customers"?

Response 6

The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been requested and provided in the SD CCAs' prior discovery responses and/or testimony on the same subject. The SD CCAs object to this Request to the extent it requests legal conclusions, legal positions, strategic judgments, or internal deliberative analyses or opinions regarding the SD CCAs' compliance with applicable law and regulations relating to the LMS, rather than facts, and are therefore not a proper subject for discovery and may be protected as a confidential attorney-client communication or by the attorney work product doctrine. The SD CCAs further object to this Request to the extent it seeks information or documents protected as a confidential attorney-client communication and/or attorney work product or are otherwise confidential, proprietary or sensitive data, trade secrets and information. The SD CCAs further object to this request as unduly burdensome to the extent it seeks production of information that is already publicly reported and equally accessible to the requesting party.

Subject to and without waiving these objections, the SD CCAs respond as follows:

The SD CCAs refer SDG&E to their response to Data Request No. SDGE-CEA-DR-01, Response 1, their intervenor testimony filed on September 11, 2026, in particular pages 14:4-6, 41:20 – 43:9, and 59:3-19, and their Response to Request 1, above.

As discussed in detail in the referenced pages in the SD CCAs' testimony and elsewhere in such testimony, in the absence of timely energy usage data, the SD CCAs' day-ahead load forecast is less accurate, resulting in over- and under-procurement relative to actual grid conditions. Load forecast and procurement errors would lead to rates that may be mis-aligned to actual grid conditions and thus marginal-costs. Without timely energy data, forecast errors increase and thus the efficacy of dynamic pricing signals is reduced.

END OF RESPONSE

ATTACHMENT C

SD CCA Data Request 001

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OBJECTIONS TO INSTRUCTIONS

1. SDG&E objects to the instructions to the extent they purport to require verified responses.
2. SDG&E objects to the instructions to the extent they purport to require the individual(s) responsible for providing the response and/or designate the proper witness to cross-examine concerning the response. The responses reflect SDG&E's response as a Company to the requests and not the work of any one individual.
3. SDG&E objects to the instructions to the extent they state that the requests are ongoing in nature and require subsequent, supplemental information.
4. SDG&E objects to the instructions to the extent they request responses in multiple formats.
5. SDG&E objects to the instructions to the extent they provide shortened timelines for objections and requests for clarification.

EXPRESS RESERVATIONS

1. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.
2. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.

Subject to the foregoing objections and reservations, SDG&E responds as follows.

QUESTION 1

Please refer to Witness D. Golan's testimony (Ex. SDG&E-01) on page 4, lines 5-6, where Golan notes that, "SDG&E has already begun to experience significant levels of SM 1.0 device failures."

a. Can SDG&E define "significant levels" of SM 1.0 device failures using SDG&E's reliability KPIs and thresholds?

b. Provide the observed failure frequency for the last 24–36 months, including counts and normalized failure rates (e.g., failures per 1,000 devices per month) by device class and failure mode, with installed base denominators.

c. Provide a description of how SDG&E differentiates device failures from communications/network and IT system failures?

SDG&E Response:

a. Significant levels of failures are defined as failure counts that exceed SDG&E's workforce capacity to address.

b. Please see below for monthly failure data for both the electric and gas populations. Gas modules are not tracked by device class.

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Electric Failures									
	Device Class Type								
Month / Year	ITR1	ITR3	ITR4	ITRD	ITRF	ITRJ	ITRK	Grand Total	% Failure of Total Population
Jan-24	2963	49	51	64	9		1	3137	0.21%
Feb-24	2405	52	39	42	6			2544	0.17%
Mar-24	2158	55	22	38	7	2		2282	0.15%
Apr-24	2158	22	28	40	4	1		2253	0.15%
May-24	2029	41	64	56	11	1	1	2203	0.15%
Jun-24	1633	57	33	63	10	1		1797	0.12%
Jul-24	1786	32	40	52	10			1920	0.13%
Aug-24	2146	40	63	56	14			2319	0.15%
Sep-24	2959	48	26	94	14			3141	0.21%
Oct-24	4238	81	53	82	10			4464	0.30%
Nov-24	3714	29	28	66	13	1		3851	0.26%
Dec-24	3537	41	45	124	10		1	3758	0.25%
Jan-25	3286	47	49	103	20	1		3506	0.23%
Feb-25	2803	73	36	102	19		1	3034	0.20%
Mar-25	2618	79	34	109	10	1	1	2852	0.19%
Apr-25	2282	89	53	65	22	1		2512	0.17%
May-25	2196	65	22	93	15	1		2392	0.16%
Jun-25	1805	53	23	71	11	1		1964	0.13%
Jul-25	2206	54	18	65	6	3	1	2353	0.16%
Aug-25	2477	77	33	108	14	2		2711	0.18%
Sep-25	3181	40	23	94	15	2		3355	0.22%
Oct-25	4265	34	24	93	9	4	3	4432	0.30%
Nov-25	4127	34	27	62	14	1	1	4266	0.28%
Dec-25	4627	69	19	83	22	4		4824	0.32%
Grand Total	67599	1261	853	1825	295	27	10	71870	4.79%
# of total devices	1,500,000								

Note: Over the past two years (2024–2025), 94% of electric meter failures have occurred within the ITR1 device class.

Gas Failures		
Month / Year	Grand Total	% Failure of Total Population
Jan-24	923	0.10%
Feb-24	433	0.05%
Mar-24	343	0.04%
Apr-24	272	0.03%
May-24	453	0.05%
Jun-24	243	0.03%
Jul-24	252	0.03%
Aug-24	291	0.03%
Sep-24	455	0.05%
Oct-24	944	0.10%
Nov-24	1569	0.17%
Dec-24	1452	0.16%
Jan-25	901	0.10%
Feb-25	331	0.04%
Mar-25	461	0.05%
Apr-25	322	0.04%
May-25	398	0.04%
Jun-25	313	0.03%
Jul-25	274	0.03%
Aug-25	326	0.04%
Sep-25	423	0.05%
Oct-25	996	0.11%
Nov-25	1673	0.19%
Dec-25	1373	0.15%
Grand Total	15421	1.71%
# of total devices	900,000	

c. SDG&E utilizes a smart meter data operations (SMDO) team to monitor non-communicating endpoints. The SMDO team collaborates with a separate network ops team, as well as IT teams to identify root causes of non-communicating endpoints other than simple device failure.

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QUESTION 2

Please refer to Witness D. Golan's testimony (Ex. SDG&E-01) on page 6, lines 4-7, where Golan notes that, "SDG&E's SM 2.0 deployment approach seeks to adapt existing SM 1.0 infrastructure to the SM 2.0 environment to the greatest extent feasible. To this end, SDG&E will incorporate certain SM 1.0 systems into the SM 2.0 environment (Persistent systems) and undertake targeted replacement of other SM 1.0 systems (To-Be-Retired systems)."

a. **Please identify and provide a comprehensive, system level inventory of all SM 1.0 components, platforms, applications, and network elements that SDG&E proposes to designate as Persistent Systems, as well as those designated as ToBeRetired Systems, including but not limited to meter hardware, communications networks, headend systems, meter data management systems (MDMS), integration middleware, and associated IT and cybersecurity components.**
b. **For each system identified as a Persistent System, please describe the technical basis for continued use, including compatibility with SM 2.0 meter hardware, communications protocols, data volumes, latency requirements, cybersecurity standards, and anticipated functional enhancements.**
c. **Please explain whether the integration of SM 1.0 Persistent Systems into the SM 2.0 architecture will require material modification, re-engineering, software refactoring, or additional capital or O&M expenditures, and if so, identify the scope and cost of such efforts.**
d. **Please describe any technical constraints, performance limitations, or operational risks associated with retaining SM 1.0 Persistent Systems within the SM 2.0 environment, including impacts to scalability, interoperability, system resilience, and future upgrade flexibility.**
e. **Finally, please explain how SDG&E has determined that the proposed hybrid architecture—retaining selected SM 1.0 systems while replacing others—will result in a seamless, integrated, and future-proof SM 2.0 platform, as opposed to perpetuating legacy limitations or increasing long-term integration and maintenance costs.**

SDG&E Response:

a. A comprehensive list of Persistent SM Systems is defined in Exhibit (Ex.) SDG&E-05, page BMB-3. A comprehensive list of To-Be-Retired Systems (SM 1.0 systems that will be fully decommissioned after transition) is defined in Ex. SDG&E-05, page BMB-2.

b. The Persistent Systems remain operational because they continue to perform distinct and necessary business and regulatory functions separate from the SM 1.0 HES and metering network functions. These systems do not interact directly with current SM 1.0 meter hardware or communication protocols and as such will also not interact directly with SM 2.0 meter hardware or communication protocols. For data volumes, latency requirements,

cybersecurity standards, and compatibility with anticipated functional enhancements, SDG&E assessed these criteria and has confirmed its ability to meet them based on the proposed enhancements outlined in the testimony of Bradley M. Baugh (see SDG&E's response to Question 1.2.c below).

c. Enhancements to these Persistent Systems are required to support SM 2.0 and are described in the testimony of Brad Baugh as follows:
   - MDMS (Ex. SDG&E-05, page BMB-29);
   - Gas Core Balancing, MSAP, Smart Meter Cloud Data Lake, COKE, and EDA (Ex. SDG&E-05, page BMB-32– BMB-33);
   - The MV-90 and CEN persistent systems are not impacted by SM 2.0 and do not require changes.

   Cost estimates for these changes have been included in the associated workpaper (Ex. SDGE-05 IT and Network Requirements).

d. The mitigation of any technical constraints, performance limitations or operational risks, are addressed by the enhancements outlined in the testimony of Bradley M. Baugh (see SDG&E's response to Question 1.2.c above).

e. To determine which systems would be retained or retired, SDG&E assessed the compatibility, scalability, and long-term viability of each of the current smart meter systems. The vendor products designated as Persistent Systems are mature, stable, supported, and widely used in industry. The Persistent Systems that are SDG&E-built are architecturally decoupled from the head-end and are enhanced and maintained by SDG&E using third-party software and tools that are widely adopted, have third-party vendor support and active developer communities.

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QUESTION 3

Please refer to Witness D. Golan's testimony (Ex. SDG&E-01) on page 8, lines 9-11, where Golan mentions that SDG&E retained Ernst & Young to work with key internal stakeholder groups to identify SM 2.0 use cases. Please provide all work papers and work product including, but not limited to reports, studies, analyses and workpapers that Ernst & Young provided to SDG&E.

SDG&E Response:

Please see attached folder, "Attachments Q 1.3" for the corresponding Attachments to Question 1.3 for SDG&E's response to this question.

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QUESTION 4

Please refer to Witness D. Golan's testimony (Ex. SDG&E-01) on page 8, line 20, through page 10, line 2, where Golan notes that, "SDG&E issued the RFP in March 2025, soliciting bids from the leading five smart meter vendors (including SDG&E's incumbent vendor). Two vendors responded to the RFP with comprehensive proposed solutions. SDG&E's incumbent vendor did not offer a bid into the solicitation. . .. As detailed in Chapter 3, one vendor solution was the clear winner in terms of both cost and functionality. This solution not only satisfied the full set of evaluation criteria related to SM 2.0 base features, but also offered a suite of mature, robust NextGen capabilities available to be deployed immediately or in the future. It directly addressed the limitations of SDG&E's current SM 1.0 system while also aligning with future regulatory and operational needs, delivering more functionality at a lower overall cost. The total estimated loaded cost of SDG&E's proposed SM 2.0 solution is $825M, which covers immediate deployment of base functions and selected NextGen capabilities."

a. **Are the referenced NextGen capabilities to be deployed immediately by the preferred vendor compatible with the SM 1.0 "Persistent Systems"?**
b. **Can SDG&E articulate the list of current SM 1.0 system limitations and future regulatory and operational needs that will be addressed by the preferred vendor solution?**

SDG&E Response:

a. The architecture required to support the NextGen capabilities does not require the use of the SM 1.0 Persistent Systems, therefore compatibility is not a concern.

b. SDG&E's Smart Meter 1.0 has several limitations that have prevented it from expanding for new uses. First, the current network is limited on the amount of data it can send to back-office systems, which has limited the ability to send additional voltage data to SDG&E's electric distribution teams. Second, it does not support newer versions of gas modules or electric meters, including those that can enable next generation capabilities such as those requested. Third, the incumbent vendor has indicated that the current HES will be end-of-support and that SDG&E will need to transition off that technology. SDG&E anticipates that the Smart Meter 2.0 underlying architecture will allow the flexibility to implement future regulatory requirements. Lastly, as noted previously, SDG&E is looking ahead at targeted deployment of new smart meter technology that balances the twin goals of supporting customers' current needs – including protecting customer affordability – and "future proofing" the metering infrastructure to ensure its ability to meet evolving customer expectations and support California's policy vision by achieving a more intelligent, responsive, and resilient grid infrastructure.[1] This approach

[1] Exhibit (Ex.) SDG&E-01 at DG-5.

supports SDG&E's commitment to providing flexible, resilient, and innovative services that keep pace with changing market expectations and regulatory requirements.[2]

[2] *Id.* at DG-7.

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QUESTION 5

Please refer to Witness S. Butler's testimony (Ex. SDG&E-02) on page 2, Figure 2-1 where Butler includes a diagram of SM 1.0 End-to-End Infrastructure. Please explain where CCAs currently fit into this data chain for data access purposes.

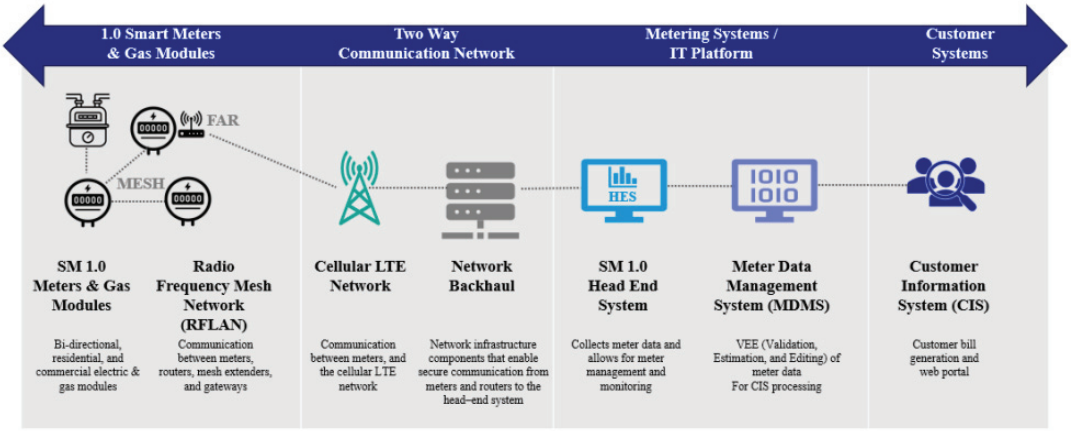
a. Specifically explain at what point in this chain CCAs receive meter data.

b. Please explain how CCAs' access to SM 1.0 customer meter data has changed in the last 5 years.

SDG&E Response:

a. Please refer to Ex SDG&E-02, Figure 2-1 (re-printed below) for SDG&E's response to this question.

Figure 2-1
Smart Meter 1.0 End-To-End Infrastructure



SDG&E does not anticipate any changes to CCA meter data access as a result of the SM 1.0 to SM 2.0 transition. In Figure 2-1 above, the CCAs will receive data after the data flows into the CIS at the far right of the diagram. Data is shared with the CCAs from the CIS through the CCA data lake and through the files exchanged with CCAs for billing (known as the "867" file process).

b. In 2021, SDG&E replaced its CIS which enabled large-scale data transmission to the CCAs through EDI transactions. In 2023, at the request of the CCAs, SDG&E implemented a CCA data lake to allow for access to customer interval meter data within 24-48 hours of power flow. Since implementation of this data lake, SDG&E has worked on an ongoing basis with the CCAs and their back-office agent, Calpine, to enhance the availability of this information.

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QUESTION 6

Please refer to Witness S. Butler's testimony (Ex. SDG&E-02) on page 3, lines 1-2, where Butler states, "Beyond customer systems, the HES also supplies data to other critical functions, such as outage management."

a. Name all "critical functions."
b. Name all the offices and divisions within SDG&E that view and analyze this data.

SDG&E Response:

a. In this context, critical functions refer to the following systems that utilize non-consumption meter data:

Application Name	Critical Function	Business Division
OMS	Outage management	Electric Distribution Operation
Time-Series Software	Voltage anomaly detection	T&D Engineering (System Protection)
Energized Down Conductor	Distribution operator alerts for potential downed conductors	Electric Distribution Operation/ System Protection

b. Please see the response to Question 6.a above for the primary SDG&E offices and divisions that analyze this data.

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QUESTION 7

Please refer to Witness S. Butler's testimony (Ex. SDG&E-02) on page 4, lines 18-19, where Butler states, "Currently, ~85% of SDG&E's customers have a My Energy Center account, with ~70% using their account to view usage data, understand and pay their bill."

a. What percentage of SDG&E's customers can access their usage data in real time or near real time as those terms are used in D.09-12-046, D.11-07-056, Resolution E-4527 and subsequent decisions?
b. Of the customers that can access their usage data in real time or near real time, what percentage of customers are bundled customers and what percentage are unbundled customers
c. Of the customers with a My Energy Center account, what percentage of customers are bundled customers and what percentage are unbundled customers?
d. Of the customers that with a My Energy Center account that use their account to view usage data, what percentage of customers are bundled customers and what percentage are unbundled customers?

SDG&E Response

SDG&E objects to this request as overly broad in that it seeks the production of information that may be outside the scope of this proceeding. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

a. The referenced decisions and resolution use "real time" or "near real time" data access largely in reference to the Home Area Network (HAN) technology available at the time. Pursuant to Decision (D.) 22-12-009, SDG&E discontinued its HAN offerings in 2023. SDG&E has not tracked or maintained current customer use of the HAN since the pairing contract ended in 2023.

b. 79.7% of customers with a My Energy Center account are unbundled and 20.3% are bundled.

c. All bundled and unbundled customers have equal access to view usage data via My Energy Center. SDG&E's standard analytics for My Energy Center do not include page-level segmentation by bundled or unbundled customer status.

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QUESTION 8

Please refer to Witness S. Butler's testimony (Ex. SDG&E-02) on page 12, line 23, through page 13, line 2, where Butler states that, "From January to November of this year, SDG&E issued ~400k estimated bills representing ~1.9% of all bills during this timeframe – a clear indication of the mounting impact of SM 1.0 device failures."

a. Please provide SDG&E's historical baseline rate of estimated billing for the five calendar years preceding 2025, reported on an annual basis and expressed as a percentage of total bills issued in each year.

b. For each year, please identify:
- **i. Total number of bills issued,**
- **ii. Total number of estimated bills issued, and**
- **iii. The resulting estimated bill rate (estimated bills ÷ total bills).**

c. Please explain the primary drivers of estimated billing during this five-year period, including the extent to which estimated bills were attributable to:
- **i. SM 1.0 device failures (e.g., meter or gas module failure),**
- **ii. Communications or network failures,**
- **iii. Planned operational activities (e.g., meter exchanges, system migrations),**
- **iv. Other non-meter related causes (e.g., access issues, weather events, billing system outages).**

SDG&E Response:

a. The table below provides annual total estimated bill counts, year-over-year estimated bill percentage increase, and percentage of estimated bills compared to total number of annual bills. Data prior to April 2021 is not available.

Monthly Bills:	1,700,000
Annual Bills:	20,400,000

	Total Estimations				
	Reads	**Interval**	**Total**	**YoY % Inc.**	**% Total Bills**
2021*	65,763	59,755	125,517	0%	0.6%
2022	73,254	58,551	131,805	5%	0.6%
2023	132,955	109,217	242,172	84%	1.2%
2024	176,922	211,441	388,363	60%	1.9%

* Used a monthly average using April thru December 2021 data as a proxy because data for January thru March 2021 is not available.

b. Please see SDG&E's response to Question 8.a above.

c.

i. SM 1.0 device failures were not the primary driver of estimated bills until 2021, when failures began to increase in quantity. Since 2021, the consistent annual increase in estimated bills correlates to the consistent annual increase in SM 1.0 device failures.
ii. Due to the limitations of the current SM 1.0 network, there are pockets of electric and gas meters that fall outside of existing network coverage. There are approximately 3k endpoints that fall into this category. These endpoints are manually read on average 6x per year, with estimations occurring in the other 6 months.
iii. Planned operational activities are not a primary driver of estimated bills.
iv. Other non-meter related causes have not been a primary driver of estimated bills.

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QUESTION 9

Please describe SDG&E's Energy Supply & Dispatch (ES&D) group:

a. **Is ES&D located in the Origination, Energy, Supply and Dispatch Department? If not, please specify which department ES&D is in.**
b. **Does ES&D engage in wholesale power sales or marketing functions on behalf of SDG&E?**
c. **Does any other division or group other than ES&D engage in wholesale power sales or wholesale marketing functions on behalf of SDG&E? If so, please name them.**
d. **Is ES&D functionally separate from any of SDG&E's other offices and divisions? If yes, please explain why. If no, please explain why.**
e. **Does ES&D in any way receive and/or utilize customers' meter data?**
f. **If ES&D receives and/or uses customer meter data, please explain the granularity of that data.**
g. **If ES&D receives or uses customer meter data, please explain the latency of that data.**
h. **If ES&D does receive and/or utilize customers' meter data, explain how the data is used and why the data is used in that way.**

SDG&E Response:

SDG&E objects to the entirety of this request on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection and subject thereto, SDG&E responds as follows:

SDG&E's energy procurement function does not use customer-specific meter data. It receives interval load data 2-3 days after the powerflow.

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QUESTION 10

Please refer to Witness S. Butler's testimony (Ex. SDG&E-02) on page 5, lines 6-7, where Butler states, "Absent advanced metering infrastructure, core utility functions become inefficient and customer dissatisfaction more likely."

a. Define "core utility functions."
b. Name and describe the offices or divisions within SDG&E responsible for those functions.
c. Is SDG&E's Energy Supply & Dispatch group involved in any "core utility functions"?
d. Please admit that absent advanced metering infrastructure demand response programs can become inefficient, and customers may become dissatisfied. If denied, please explain why not.
e. Please admit that absent advanced metering infrastructure energy efficiency programs can become inefficient, and customers may become dissatisfied. If denied, please explain why not.
f. Please admit that absent advanced metering infrastructure electric vehicle charging programs can become inefficient, and customers may become dissatisfied. If denied, please explain why not.
g. Please admit that absent advanced metering infrastructure energy procurement decisions can become inefficient, and customers may become dissatisfied. If denied, please explain why not.
h. Please admit that absent advanced metering infrastructure dynamic rate programs can become inefficient, and customers may become dissatisfied. If denied, please explain why not.

SDG&E Response:

a. In the context of the above-referenced testimony, "core utility functions" refers to metering, billing and customer services activities.
b. The division within SDG&E responsible for metering, billing and customer service is the Office of the Customer.
c. The testimony referenced in this question does not pertain to SDG&E's energy procurement activities.
d. In the absence of advanced metering functionality, demand response programs can become inefficient, and customers may become dissatisfied.
e. In the absence of advanced metering functionality, energy efficiency programs can become inefficient, and customers may become dissatisfied.
f. The testimony referenced in this question does not pertain to electric vehicle charging programs.
g. Please see response to Question 10.c.

h. The testimony referenced in this question does not pertain to SDG&E's rate making activities.

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QUESTION 11

Please refer to Witness S. Butler's testimony (Ex. SDG&E-02) on page 5, lines 8-11, where Butler states, "Beyond the customer-facing aspects of SM 1.0, the technology has delivered significant grid-side benefits for SDG&E. Interval data supports load visibility, improving forecasting and planning, while two-way communication improves situational awareness critical for outage management and restoration."

a. Explain how interval data supports load visibility and improves forecasting and planning.
b. Please explain each utility function that benefits from improved forecasting and planning due to the use of interval data.
c. Describe how this data is processed and analyzed within SDG&E when forecasting and planning.

SDG&E Response:

a. Hourly interval data provides insight into when customers use energy, allowing for improved forecasting and planning. The hourly interval data used as an input to the load forecasting model can help improve forecasting as the data shows load patterns, peak usage and how usage changes with weather and customer behavior.
b. Functions that generally benefit from improved forecasting and planning with use of interval data include, but are not limited to: Load forecasting, planning, system operations, and reliability functions.
c. Forecast and load data of which AMI contributes to the underlying estimation, is collected from CAISO settlement data and used as an input to build a short-term forecasting model used by ES&D.

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QUESTION 12

Please provide a copy of SDG&E's Master Service Agreement referenced in Witness S. Butler's testimony (Ex. SDG&E-02) on page 11, line 3.

a. Please also describe, and provide if available, the Master Service Agreement that SDG&E plans to use to replace that expiring Master Service Agreement.
b. Did SDG&E ever seek to renew or extend the current MSA? If not, why?

SDG&E Response:

The response below contains confidential information. The confidential information is highlighted in yellow. Attachment A of the corresponding confidentiality declaration(s) include justification(s) for maintaining the information as confidential.

SDG&E is coordinating with the vendor regarding the production of the referenced Master Service Agreement. Accordingly, SDG&E respectfully requests additional time to respond to this request and will supplement its response once that process is complete.

a. SDG&E is actively evaluating options to ensure continued support of the existing SM 1.0 system during the limited period of transition to SM 2.0. SDG&E anticipates further discussions with the incumbent vendor to define the specific scope of ongoing support required during the transition period. As such, there is no replacement MSA to describe or provide.

b. Under the MSA between SDG&E and its incumbent vendor, the vendor's obligation to provide key support (e.g., software and related maintenance & support service, pricing commitments, product availability) will expire in 2028. The MSA provides that SDG&E may seek to renew its software and related maintenance & support service so long as the vendor continues to offer the service after 2028, subject to applicable termination rights by the parties.

The RFQ to the incumbent vendor was intended to help SDG&E understand the vendor's ability to provide extended hosting, software, and managed services support for the current smart metering environment beyond the existing MSA term. In response to the RFQ, the incumbent vendor indicated that it plans to go to "end of new sales" and "end of support" for software and related maintenance & support service, and would work with SDG&E on a plan to transition off of its platform. It also indicated that, in any event, it would cease providing any such software and related maintenance & support service in 2035.

SDG&E is actively evaluating options to ensure continued support of the existing SM 1.0 system during the limited period of transition to SM 2.0. SDG&E anticipates further

discussions with the incumbent vendor to define the specific scope of ongoing support required during the transition period.

QUESTION 13

Please refer to Witness S. Butler's testimony (Ex. SDG&E-02) on page 11, lines 17-19, where Butler states, "Installing more SM 1.0 RFLAN-based devices would deepen SDG&E's dependence on technology that the meter manufacturer has indicated is becoming obsolete as it reaches end-of-life and nears end-of-service." Define "end-of-life" and "end-of-service" and explain the difference between those terms.

SDG&E Response:

End-of-life refers to the point at which metering devices or associated systems have reached the end of their useful life as utility assets. This condition is typically characterized by factors such as manufacturer discontinuation, withdrawal of vendor support, lack of replacement parts, technology obsolescence, or escalating failure rates that render continued maintenance impractical or unreasonable.

End-of-service refers to the point at which metering infrastructure vendor, even if some components remain physically operable, can no longer reliably support required utility operations or meet network, systems, technology, security, or integration requirements necessary to fulfill SDG&E's responsibilities. End-of-service may occur prior to end-of-life.

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QUESTION 14

Please refer to Witness D. Thai and B. Baugh's testimony (Ex. SDG&E-03) on page 5, lines 6-9, where the witnesses state, "Unlike earlier models that provide only periodic readings, SM 2.0 electric meters can record thousands of measurements per second. This capability facilitates advanced analytics, including customer insights, which helps SDG&E better understand and manage demand across the grid."

a. Explain in detail how SDG&E uses this data to better understand and manage demand across the grid.
b. Name and describe all offices and divisions within SDG&E that are responsible for "understand[ing] and manag[ing] demand across the grid."
c. List all categories of parties that will have access to this data.
d. List all categories of parties that will have access to this data in real time or near real time as those terms are used in D.09-12-046, D.11-07-056, Resolution E-4527 and subsequent decisions.
e. Specify which of those categories of parties can only access this data with customer consent. Please explain how this answer might change if the data is real time or near real time.
f. Specify which of those categories of parties can access this data without customer consent. Please explain how this answer might change if the data is real time or near real time.

SDG&E Response:

a. The reference in testimony to "thousands of measurements per second" relates to waveform sampling, in contrast to interval energy reads. Waveform measurements of voltage or current, time-synchronized, can enable applications for enhanced electric grid operator situational awareness, system dynamics monitoring, and developments in incipient fault detection. Additionally, this significantly increased granularity supports power-quality monitoring and signature identification to capture voltage sags, swells, system transients, and harmonics.

b.-f. SDG&E objects to Question 14.b – 14.f on the grounds that these questions: (i) are neither relevant to the subject matter involved in the pending proceeding nor reasonably calculated to lead to the discovery of admissible evidence; (ii) are overly broad and unduly burdensome; and (iii) are vague, unintelligible, or fail to identify with sufficient particularity the information or documents requested.

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QUESTION 15

Please refer to Witness D. Thai and B. Baugh's testimony (Ex. SDG&E-03) on page 8, lines 21-24, where the witnesses state, "SDG&E's focus is on NextGen capabilities that will provide improved access to real-time energy data that will allow residential customers to gain unprecedented insights into their own consumption, while providing SDG&E with improved situational awareness and the ability to monitor and manage the local grid with greater precision."

a. **Confirm whether residential customers will have "access to real-time energy data."**
b. **Confirm whether other customers in other customer classes will have "access to real-time energy data."**
c. **Will there be any difference between bundled and unbundled customers' access to real time energy data? Explain in detail any difference.**
d. **Does SDG&E's Energy Supply & Dispatch group "monitor and manage" the local grid in any way?**
e. **Will SM 2.0 NextGen capabilities result in CCAs receiving interval data for their customers in real time?**

SDG&E Response:

a. Yes, customers may receive real-time energy monitoring through the Customer Insights Real Time Energy Monitoring capability once enrolled and configured.

b. Customers in non-residential customer classes will not have access to real-time energy data through SM 2.0 NextGen capabilities.

c. There will be no differences in this functionality between bundled and unbundled customers.

d. No. SDG&E's Energy Supply & Dispatch group is responsible for electric and fuel procurement activities, including commodity trading and portfolio management. Monitoring and management of the local electric grid, including distribution and transmission system operations, is the responsibility of operational departments.

e. No. Neither SDG&E nor the CCAs will have access to interval data for their customers in real-time.

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QUESTION 16

Please provide any studies, reports, analysis, other documents that describe how SDG&E will maintain continuity of meter data access for CCAs as individual CCA customers are transitioned from SM 1.0 to SM 2.0. If no such documents exist, please explain SDG&E's plan to maintain continuity of meter data access for CCAs during the transitional period.

SDG&E Response:

SDG&E reviewed the technical and operational challenges associated with mass meter replacement such as manual data entry errors and incorrect location assignments. SDG&E did not produce specific documentation as part of this analysis. To mitigate risks, SDG&E is implementing an additional installation validation capability. This process utilizes standardized installation photos and Artificial Intelligence to verify correct device placement and ensure continuity of gas consumption during the module exchange. This system directly reduces billing exceptions and provides a verifiable audit trail for compliance and customer assurance (*See* Ex. SDG&E-05, page BMB-32).

SDG&E does not anticipate any changes to CCA meter data access as a result of the SM 1.0 to SM 2.0 transition. Existing data access processes, interfaces, and data delivery mechanisms used by CCAs will remain in place.

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QUESTION 17

Describe any planned notices of meter exchanges and any measures to prevent data gaps or degradation of data quality during the transition.

SDG&E Response:

As part of SDG&E's proposed SM 2.0 ME&O plan, SDG&E will establish a structured deployment and customer notification process as part of the Smart Meter 2.0 implementation to minimize disruption. Notifications will include timing of the exchange, potential service impact, and instructions for any required customer actions.

Please see SDG&E's response to Question 16 above for information about planned measures to reduce data gaps or degradation of data quality.

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QUESTION 18

Please refer to Witness D. Thai and B. Baugh's testimony (Ex. SDG&E-03) on page 9, lines 3-9, where the witnesses state that real-time energy monitoring "[p]rovides customer visibility into behind the meter devices driving customer energy consumption. Real-time intelligence provides customers with knowledge – knowledge of an aged refrigerator needing replacement – knowledge that the electric water heater is running far too often due to a leak. This capability will be available to residential customers but would only be enabled for those customers who opt-in to activate this functionality in their account."

a. Will this opt-in mechanism apply to both bundled and unbundled customers?
b. Describe all plans to educate customers about this opt-in program, including how SDG&E will inform both bundled and unbundled customers of the program's availability.
c. Will customers be able to opt into this capability immediately upon receiving their SmartMeter 2.0? If not, at what point will this option be available?
d. Will SDG&E or its meter vendor charge a fee for customers to opt in to real-time data access? If so, please describe that fee.

SDG&E Response:

a. The opt-in mechanism will be available to distribution service customers, including customers who have opted to take retail commodity service from a non-IOU provider.
b. All distribution service customers, including customers who have opted to take retail commodity service from a non-IOU provider, will receive the same education regarding the functionalities and benefits of their new smart meter, as well as information on how to opt-in for real-time energy monitoring.
c. Real-time energy monitoring is a NextGen capability and, if approved, design/development will begin as early as 2028 and may be completed as early as 2029 (Ex. SDG&E-04, page 10). Customers will be able to opt-in after installation is completed and meter performance has been validated. At this time, SDG&E has not determined whether a fee will be charged for distribution service customers to opt into customer insights services that will be enabled by next-generation AMI. SDG&E continues to evaluate the underlying technology, potential service offerings, and associated considerations related to enhanced customer insights. This evaluation includes assessing how such services could be delivered, the costs associated with enabling and maintaining them, and the extent to which customers may derive value from more granular access to their meter data.

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QUESTION 19

Please refer to Witness D. Thai and B. Baugh's testimony (Ex. SDG&E-03) on page 8, lines 5-6, where the witnesses state that "[t]he SaaS environment is continuously monitored with near-real time threat detection, allowing rapid response to emerging risks." Does SDG&E intend to coordinate with SD CCAs when confronted with threats and emerging risks? If so, how?

SDG&E Response:

Customers who choose to take retail commodity service from a non-IOU provider remain SDG&E customers for distribution and transmission services. Monitoring and evaluation of threats and the associated response to emerging risk is functionally related to managing infrastructure and not within the scope of the CCA's commodity procurement service responsibilities.

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QUESTION 20

Please refer to Witness D. Thai and B. Baugh's testimony (Ex. SDG&E-03) on page 5, lines 20-22, where the witnesses state, "By incorporating adaptability into the system design, SDG&E can integrate emerging technologies such as advanced demand response programs, and evolving customer-facing applications."

a. Given these adaptability improvements, what is the expected end-of-life of AMI 2.0 technologies?
b. Given these adaptability improvements, what is the expected end-of-service of AMI 2.0 technologies?
c. Has SDG&E planned for the eventual obsolescence of AMI 2.0? If so, describe these plans in detail.
d. Does SDG&E's Energy Supply & Dispatch group use customer-level data to evaluate how customers participating in "advanced demand response programs" responded to demand response events within its service territory?

SDG&E Response:

a. At this time, SDG&E has not identified a specific expected end-of-life for SM 2.0 technologies. As generally described in the Smart Meter 2.0 Application, SDG&E has designed SM 2.0 solution as an adaptable platform intended to support integration of emerging technologies and evolving applications over time. This approach is intended to allow the system to remain functionally relevant as operational needs, technologies, and customer expectations evolve. In addition to system adaptability, the long-term lifecycle and support of SM 2.0 technologies will also depend on commitments from the selected AMI technology vendor, which SDG&E expects to address through the contracting process.
b. At this time, SDG&E has not identified a specific end-of-service timeframe for SM 2.0 technologies. End-of-service considerations will depend not only on the adaptable architecture of SM 2.0, but also on vendor support terms, which will be established through contract negotiations.
c. At this time, SDG&E has not established a fixed, time bound plan for the obsolescence or replacement of Smart Meter 2.0. SDG&E's strategy is focused on procuring contemporary, widely supported technologies and designing the SM 2.0 platform to be adaptable over time. The intent is to reduce the risk of premature obsolescence by emphasizing modular systems, when possible, hardware/software upgradeability, and compatibility with evolving standards, so that components can be enhanced over time.
d. No. SDG&E's Energy Supply & Dispatch group does not use customer-level meter data.

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QUESTION 21

Identify any contractual, technical, or cybersecurity constraints (e.g., cellular carrier terms, SaaS HES terms, vendor analytics platform terms) that SDG&E contends prevent providing near-real-time data to CCAs, and produce the provisions relied upon.

SDG&E Response:

SDG&E objects to this question on the grounds that it is: (i) neither relevant to the subject matter involved in the pending proceeding nor reasonably calculated to lead to the discovery of admissible evidence; (ii) overly broad and unduly burdensome; (iii) vague, unintelligible, or fail to identify with sufficient particularity the information or documents requested.

The Application does not propose to offer real-time or near-real-time data to either SDG&E or CCAs.

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QUESTION 22

Please refer to Witness B. Baugh, D. De Clercq, and D. Thai's testimony (Ex. SDG&E-04) on page 12 line 1 through page 20 line 5, where the witnesses discuss SDG&E's Marketing, Education, and Outreach (MEO) plan at length.

a. Describe how SDG&E will coordinate its SM 2.0 related MEO activities with CCAs, including any planned joint messaging, cobranding, or datasharing arrangements for CCA customers.
b. Does SDG&E plan to conduct customer marketing, education, or outreach toward both bundled customers and unbundled customers.
  i. If yes, explain any differences in approach or methodology in conducting marketing, education, and outreach to bundled versus unbundled customers.
  ii. If no, explain why SDG&E plans to conduct these activities toward one customer group but not the other.
  iii. Explain whether SDG&E will allow CCAs to review and propose changes to SM 2.0 MEO materials targeting CCA customers.
  iv. Explain in detail what the marketing, education, and outreach materials will look like. Provide examples if available.
c. Explain how SDG&E will ensure that these MEO materials do not disadvantage CCA programs or confuse customers regarding the role of their CCA.

SDG&E Response:

a. Customers who choose to take retail commodity service from a non-IOU provider remain SDG&E customers for distribution and transmission services. Thus, SDG&E is responsible for metering service for all customers in its service territory. SDG&E does not intend to provide joint messaging or co-branded materials related to its distribution service offering. SDG&E may share communications with non-IOU retail commodity service providers for awareness purposes. With regard to data sharing, please see response to Question 16.

b. SDG&E will provide marketing, education, or outreach to all distribution service customers.
  i. The methodology for marketing, education, and outreach activities will be the same for all distribution service customers.
  ii. N/A
  iii. SDG&E may share communications with non-IOU retail commodity service providers for awareness purposes.
  iv. Marketing, education, and outreach materials have not been developed. As such, no examples are available at this time.

c. Please see response to Question 22.a. The MEO materials will relate to SDG&E's distribution service, which is distinct from the retail commodity service provided to some customers by the CCAs.

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QUESTION 23

Please refer to Witness B. Baugh's testimony (Ex. SDG&E-05) on page 10, lines 10-11, where Baugh states that, after the Head-End System "collects data from electric meters and gas modules," the "data is then sent to the [Meter Data Management System (MDMS)], where it is aggregated, validated, and processed."

a. Describe all the uses that SDG&E currently has for the data before it is sent to MDMS, while it is at MDMS, and after it is aggregated, validated, and processed by MDMS.
b. Please list all offices, divisions or departments within SDG&E that MDMS sends this data to or that otherwise have access to the MDMS data.
c. Please list all offices, divisions or departments within SDG&E that have access to the data before it is aggregated, validated, or processed.
d. Please list all offices, divisions or departments within SDG&E that have access to the data after it is aggregated, validated, or processed.

SDG&E Response:

a. Pre-MDMS

There is no use of consumption data prior to being sent from the HES to MDMS.

Within-MDMS

While it's in the MDMS, the data is aggregated, validated, and estimated.

Post-MDMS

After the data leaves the MDMS it is sent to CIS for billing, customer presentment, and to populate both the CIS data lake and CCA data lake. Aggregated gas usage data is also sent daily to a core gas customer report. Aggregated quarterly gas and electric data is also used for Energy Data Access regulatory reporting. Consumption data is also sent to the Engineering Data Warehouse where it's used by electric distribution teams for reliability and grid operations.

Once the data is in the CIS data lake, multiple organizations can use the data for their own business purposes such as energy efficiency and demand response, distributed energy resource integration, market settlement & regulatory reporting, and grid planning and asset management.

b. As it relates to consumption data, there are no offices, divisions or departments within SDG&E that have access to the MDMS data.

c. As it relates to consumption data, there are no offices, divisions or departments within SDG&E that have access to the data before it is aggregated, validated or processed.

d. Multiple departments have access to the data after it is aggregated, validated or processed, including but not limited to: customer service, smart meter network operations, electric meter engineering, energy innovation, and Smart Meter IT.

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QUESTION 24

Please refer to Witness B. Baugh's testimony (Ex. SDG&E-05) on page 10, lines 11-13, where Baugh states, "Finally, the validated meter data is forwarded to the CIS for billing and other back-office operations. Operational systems that use smart meter data are also included."

a. Define "back-office operations" in this context.
b. Define "operational systems" in this context.
c. Describe all the ways in which SDG&E currently utilizes this validated meter data.
d. Does SDG&E send any pre- or post-validated meter usage data to its Energy Supply & Dispatch group? If so, please explain the quality, quantity and latency of such data and what the Energy Supply & Dispatch group uses it for.

SDG&E Response:

a. Back-office operations are non-customer-facing organizations, such as smart meter operations, customer pricing, and electric distribution operations.

b. By operational systems, SDG&E is referring to systems such as core gas balancing, and customer operational KPI's and exceptions (COKE).

c. Please see SDG&E's response to Question 23.d above.

d. Please see SDG&E's responses to Question 1.9, subsections e-h, above.

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QUESTION 25

Please refer to Witness B. Baugh's testimony (Ex. SDG&E-05) at Figure 5-7 illustrating the interim view of foundational and
Nextgen technology before the SM 1.0 systems are retired:

a. **At what point in this illustration does SDG&E plan to share data with CCAs? Please explain how SDG&E's response differs depending on whether a customer is using an SM 1.0 versus an SM 2.0.**
b. **Will SDG&E send any meter usage data to its Energy Supply & Dispatch group? If so, at what point in the diagram and on what terms?**
c. **When will the interim period, as illustrated in Figure 5-7, begin and how long will it last?**
d. **Will there be a clear start and finish of the interim period? Or is it correct to say that the transition will be gradual?**
e. **If it will be a gradual transition, will real time data be made available to customers as each new meter is installed? Or does SDG&E intend to wait until all meters are installed before providing real time data access to customers?**
f. **If it will be a gradual transition, will real time data be made available to CCAs as each new meter is installed? Or does SDG&E intend to wait until all meters are installed before providing real time data access to CCAs?**
g. **How does SDG&E choose which meters to replace first?**

SDG&E Response:

a. For both SM 1.0 and SM 2.0, SDG&E intends to share data with the CCAs after being loaded into the CIS. The Smart Meter 2.0 program is not expected to result in any material changes to the processes, timing, or availability of billing-quality data provided to CCAs. SDG&E's data sharing with the CCA's remains identical regardless of whether customers are equipped with Smart Meter 1.0 or Smart Meter 2.0 devices.

b. SDG&E's energy procurement function has access to interval data after it is sent to the CIS.

c. The interim period will last from when the first SM 2.0 meter or module is installed, and last until the final SM 1.0 meter and gas module is removed. The first meter or module is planned to be installed in 2027, and the final meter is planned to be removed by the end of 2030.[3]

[3] Ex. SDG&E-04, page 10.

d. The transition will be gradual during the replacement of 1.0 meters and modules with 2.0 devices.

e. Please see SDG&E's response to Question 18.c above.

f. Please see SDG&E's response to Question 21 above.

g. SDG&E addresses its deployment strategy and methodology for meter replacement in Ex. SDG&E-04, page BB/DC/DH-8.

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QUESTION 26

Please refer to Witness B. Baugh's testimony (Ex. SDG&E-05) at Figure 5-9 illustrating the future state solution for foundational and Nextgen technology:

- **a. At what point in this illustration does SDG&E plan to share data with CCAs?**
- **b. How long will it take from the point at which meter data is recorded at the meter for CCAs to have access to such data?**
- **c. Will SDG&E send any meter usage data to its Energy Supply & Dispatch group? If so, at what stage in the diagram and on what terms?**
- **d. Will CCAs have access to the Smart Meter Cloud Data Lake (AWS)?**
  - **i. If so, will that data be provided in real time?**
  - **ii. Please explain the latency period between when the meter data is recorded and when CCAs will have access to such meter data through the Smart Meter Cloud data lake.**
  - **iii. If SDG&E does not propose to provide CCAs with access to the SmartMeter Cloud Data Lake, please explain why.**
- **e. When does SDG&E plan to have the final SM 2.0 architecture, as illustrated in Figure 5-9, fully deployed?**
- **f. Describe, in detail, all the uses the SDG&E will have for data at each point in the data chain within the "SDG&E Data Center."**
- **g. Please explain the third-party load disaggregation app.**
  - **i. Which third-party or parties will be able to install such an app?**
  - **ii. Will customers have direct access to the data generated by this app?**
  - **iii. Can customers share data generated by this app with their authorized third-party representatives? If so, how will this work from a technical perspective?**
  - **iv. Will CCAs have access to data generated by the disaggregation app? If so, please explain the latency between when the data is generated and when the CCA will have access.**

SDG&E Response:

a. The diagram does not include CCA data delivery mechanisms, as the Smart Meter 2.0 program is not expected to result in any changes to the processes, timing, or availability of billing-quality data provided to CCAs.
b. SDG&E does not propose any changes to the manner of CCAs' receipt of customer usage data. In the current process, SDG&E receives data from its Smart Meters post-midnight. The usage data is received into the headend system and then transmitted to the meter data management system (MDMS) for validation, editing, and estimating. Once the data is processed through the MDMS, the usage data is sent to the CIS. Once the data is sent and processed by the CIS, the usage data is sent to the CCA Data Lake in AWS for overnight

processing and is available by approximately 2:00am for CCAs to extract through the data sharing process.

c. Please see SDG&E's response to Question 25.b above.

d. The Smart Meter Cloud Data Lake does not receive or store commodity usage data. It is specifically used for internal operational system and network health reporting. There is no plan to grant access to anyone outside of the Smart Meter IT and business groups.
   i. Not applicable.
   ii. Not applicable. Please see SDG&E's response to Question 1.26.d above.
   iii. Please see SDG&E's response to Question 1.26.d above.

e. If timely approval by the Commission, SDG&E intends to have the final SM 2.0 architecture fully deployed in 2030.

f. Based on data chain depicted in the diagram (Ex. SDG&E-05 Figure 5-9):
   - MV-90: uses non-smart meter data and performs validation functions prior to sending the data to the CIS for customer billing.
   - MDMS: uses smart-meter data and performs data validation, estimations and editing functions prior to sending the data CIS for billing.
   - EDA: the energy data access process queries the MDMS monthly and pulls aggregated data for regulatory reporting.
   - Gas Core balancing: this process uses aggregated gas usage data from the MDMS daily to support forecasting and system balancing for gas.
   - COKE: this process utilizes data from the MDMS for the SM operations team for issue resolution.
   - MSAP: does not use data from the MDMS but is used for meter procurement and testing processes.
   - Smart Meter Data Lake: uses data from multiple sources and is used for internal operational support and network health reporting.

g. Load disaggregation, a feature offered with the "Customer Insights - Real-time Energy Monitoring" application, is described in Ex. SDG&E-03, page DT/BB-9 lines 3-9.
   i. The application is designed for customer use. It will be available to residential distribution service customers served by SDG&E.
   ii. Yes. Residential customers who opt-in will have access to the application and the information therein. It is premature to provide specifics about direct access to any underlying data.
   iii. It is premature to provide specifics about this capability.
   iv. Please see response to Question 26.g.iii.

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QUESTION 27

Please refer to Witness B. Baugh's testimony (Ex. SDG&E-05) on page 34, lines 12-14, where the witness discusses the new systems and grid-edge and NextGen applications that will enable real-time energy monitoring.

- **a. Will SDG&E's bundled and unbundled customers both have equal access to and experiences with these grid edge applications and Nextgen capabilities?**
- **b. Will SDG&E have access to all data generated by these GridEdge and NextGen applications and capabilities?**
- **c. If yes to B., please describe the latency between when data is generated by GridEdge and NextGen applications and when SDG&E is able to view such data.**
- **d. Please explain whether CCAs will have access to all data generated by GridEdge and NextGen applications.**
- **e. If yes to D, please describe the latency between when data is generated by GridEdge and NewGen applications, and when CCAs will be able to view such data.**

SDG&E Response:

a. For "Customer Insights: Real-Time Energy Monitoring", please refer to the response to Question 28.a. The "Transformer Health and Load Management" bundle is not a customer-facing application, thus no customers will have access to this data.

b. For the "Transformer Health and Load Management" bundle, SDG&E expects to have access to non-consumption meter data. For "Customer Insights: Real-Time Energy Monitoring", this application is designed for use by customers. Whether and to what extent entities other than the customer will be provided access to the associated data is not yet known.

c. SDG&E is not in possession of this information at this time.

d. Please see response to Question 27.b. CCAs will not have access to the data associated with the "Transformer Health and Load Management" bundle.

e. N/A.

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QUESTION 28

Please refer to Witness B. Baugh's testimony (Ex. SDG&E-05) on page 36, lines 15-17, where Baugh states, "Once SDG&E residential customers enroll in the program, they can use a downloaded third-party mobile application or vendor web portal to view their disaggregated data."

a. Does SDG&E plan to offer this program to both bundled and unbundled customers?
b. If SDG&E does not plan to offer this program to both bundled and unbundled customers, explain why.
c. Please explain the enrollment process for a customer to enroll in this program.
d. Please explain the third-party mobile application or vendor web portal. Will such an application/web portal be provided by multiple vendors or only one vendor?
e. Please explain how a customer can easily share data from the third-party mobile application/web portal to the customer's authorized third parties.

SDG&E Response:

a. SDG&E will offer this program to its residential distribution service customers with SM 2.0 electric meters.

b. N/A.

c. Details regarding the enrollment process are not available at this time.

d. At this time SDG&E expects the third party mobile application and website will be provided by a single vendor to ensure a consistent experience.

e. Information regarding this functionality is not available at this time.

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QUESTION 29

Does SDG&E have plans to implement new real-time demand response programs under the AMI 2.0 framework? If so, will SDG&E's Energy Supply & Dispatch Group use data related to customers' responsiveness during demand response events when marketing power.

SDG&E Response:

SDG&E currently has no plans to implement new real-time demand response programs under the AMI 2.0 framework.

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QUESTION 30

State SDG&E's operational definition(s) of "real-time" and "near real-time" as used in SM 2.0 testimony.

SDG&E Response:

For purposes of this testimony, SDG&E does not distinguish between the terms "real-time" and "near real-time." SDG&E uses these terms to refer to the elapsed time—typically under one minute—between when an event occurs and when it is reported to the customer, user, or system for attention.

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QUESTION 31

Please explain whether the terms of "real-time" and "near real-time" data are used in vendor requirements/specifications, and identify where those definitions are documented.

SDG&E Response:

SDG&E did not define "real-time" or "near real-time" in the RFP requirements/specifications. Instead, these concepts are reflected through specific performance requirements such as latency, reliability, and synchronization thresholds described in the RFP and included in the vendor's response.

Example of some performance requirements related to "real-time" and "near real-time" listed below:

- Voltage event notifications with < 1 minute latency and a reliability of 99.5% or better.
- Outage and restoration detection notifications with < 1 minute latency and a reliability of 99.5% or better.
- On demand meter reads within 60 seconds.

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QUESTION 32

Please provide a current organizational chart of SDG&E that includes all offices and divisions.

SDG&E Response:

SDG&E objects to this request on the following grounds: (i) it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor reasonably calculated to lead to the discovery of admissible evidence; and (ii) the burden and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence.

END OF RESPONSE

ATTACHMENT D

PowerPoint presented at October 13, 2025 meeting

SDG&E D.25-08-049 Demand Flexible Rates

10/13/2025

Rate Design Comparison - Commodity

Issue	Original Application 2022	Final Decision Guidelines	SDG&E Proposed Position (Subject to Change)
Marginal Energy Costs (MEC)	CAISO Day Ahead (DA) Price	CAISO DA Price	CAISO DA Price
Energy Losses for T&D	Static by voltage level and class	Price function by load forecast	Price function by load forecast (see Rate Schedule EECC-TBS for loss formulas)
Marginal Generation Capacity Costs (MGCC)	Top hours based on load forecast	Peak MGCC function based on system net load	- Based on Loss of Load Probability - Function of load TBD
Flexible Capacity	Per GRC P2, $0	Should have a reasonable non-zero value or zero allowed with analysis and rationale	$0 based on analysis
Day of Market Costs	N/A	Optional	N/A
Transactional Pricing	N/A	Optional, up to a week out	N/A

Rate Design Comparison – T&D

Issue	Original Application 2022	Final Decision Guidelines	SDG&E Proposed Position (Subject to Change)
Marginal Distribution Capacity Costs (MDCC)	N/A	Locational based on circuit clustering or substation For circuits: SDG&E has concerns around the fairness since customers have no control of their circuit, some circuits may have more congestion and therefore more costs. There are also issues with customers being served by more than one circuit or switching circuits.	- Similar to Rate Schedule VGI - Based on circuit clustering
Marginal Transmission Capacity Costs (MTCC)	N/A	• Hourly, if hourly cost studies have been done • An hourly Transmission Cost study will take significant time to complete	Time of Use
Marginal Cost Updates	GRC P2	Updated annually if warranted	Updated annually if necessary otherwise as part of GRC P2

Rate Design Comparison - Other

Issue	Original Application 2022	Final Decision Guidelines	SDG&E Proposed Position (Subject to Change)
Non-Marginal Costs	Base Commodity Rate	• EPMC scalar • Time differentiated Base Commodity Rate • Non-volumetric with additional analysis	EPMC scaling for commodity and distribution
Export	Asymmetric Pricing	Optional with Asymmetric Pricing	N/A, see Dynamic Export Rate Pilot (DERP)
Customer Protection	N/A	• Two-part subscription • Price adjustments • Forward transactions • Other bill limiters or protections	Price Cap on CAISO DA Price
CCA	N/A	Collaborate on: • Generation components • Distribution components • Bill protection • Coordinating the launch • ME&O • Compliance with Load Management Standards	

Next Steps

- *SDG&E Request for Extension*
  - Partially granted for Feb 1st, 2026
  - Implementation of Medium C&I class 2026
- *SDG&E Application for Rehearing*
  - Filed September 29, 2025
- *Questions for CCA*
  - When will CCAs participate in RTP?
    - ▶ Timing of CCA implementation after SDG&E implements

ATTACHMENT E

PowerPoint presented at January 7, 2026 meeting

SDG&E D.25-08-049 Demand Flexible Rates

1/7/2026

Rate Design Comparison - Commodity

Issue	Final Decision Guidelines	SDG&E Proposed Position (10/13/2025)	SDG&E Proposed Position (1/7/2026)
Marginal Energy Costs (MEC)	CAISO DA Price	CAISO DA Price	CAISO DA Price
Energy Losses for T&D	Price function by load forecast	Price function by load forecast (see Rate Schedule EECC-TBS for loss formulas)	Price function by load forecast (see Rate Schedule EECC-TBS for loss formulas)
Marginal Generation Capacity Costs (MGCC)	Peak MGCC function based on system net load	- Based on Loss of Load Probability - Function of load TBD	- Based on Top 150 hours
Flexible Capacity	Should have a reasonable non-zero value or zero allowed with analysis and rationale	$0 based on analysis	$0 based on analysis
Day of Market Costs	Optional	N/A	N/A
Transactional Pricing	Optional, up to a week out	N/A	N/A

Rate Design Comparison – T&D

Issue	Final Decision Guidelines	SDG&E Proposed Position (10/13/2025)	SDG&E Proposed Position (1/7/2026)
Marginal Distribution Capacity Costs (MDCC)	Locational based on circuit clustering or substation For circuits: SDG&E has concerns around the fairness since customers have no control of their circuit, some circuits may have more congestion and therefore more costs. There are also issues with customers being served by more than one circuit or switching circuits.	- Similar to Rate Schedule VGI - Based on circuit clustering	- Similar to Rate Schedule VGI - Based on circuit clustering
Marginal Transmission Capacity Costs (MTCC)	• Hourly, if hourly cost studies have been done • An hourly Transmission Cost study will take significant time to complete	Time of Use	Time of Use
Marginal Cost Updates	Updated annually if warranted	Updated annually if necessary otherwise as part of GRC P2	Updated annually if necessary otherwise as part of GRC P2

Rate Design Comparison - Other

Issue	Final Decision Guidelines	SDG&E Proposed Position (10/13/2025)	SDG&E Proposed Position (1/7/2026)
Non-Marginal Costs	• EPMC scalar • Time differentiated Base Commodity Rate • Non-volumetric with additional analysis	EPMC scaling for commodity and distribution	EPMC scaling for commodity and distribution
Export	Optional with Asymmetric Pricing	N/A, see Dynamic Export Rate Pilot (DERP)	N/A, see Dynamic Export Rate Pilot (DERP)
Customer Protection	• Two-part subscription • Price adjustments • Forward transactions • Other bill limiters or protections	Price cap on CAISO DA Price	Price cap on CAISO DA Price and top hour approach to gen and dist capacity will act as a price cap
CCA	Collaborate on: • Generation components • Distribution components • Bill protection • Coordinating the launch • ME&O • Compliance with Load Management Standards		

Next Steps

- *SDG&E Request for Extension*
  - Partially granted for Feb 1st, 2026
  - Implementation of Medium C&I class 2026
- *SDG&E Application for Rehearing*
  - Filed September 29, 2025
- *Questions for CCA*
  - When will CCAs participate in RTP?
    - ▶ Timing of CCA implementation after SDG&E implements

ATTACHMENT F

SD CCA Response to SDG&E Data Request 01

San Diego Community Power and Clean Energy Alliance Response to
San Diego Gas and Electric Company Data Request No. SDGE-CEA-DR-01
Application 26-02-001

Requesting Party:	San Diego Gas and Electric Company ("SDG&E")
Responding Parties:	San Diego Community Power ("SDCP") and Clean Energy Alliance ("CEA," and, collectively, the "SD CCAs")
Requester:	Tyler Kirchhoff, Regulatory Case Manager Phone: 619-676-3898 E-Mail: tmkirch2@sdge.com Rebecca Hansson, Senior Counsel Phone: 619-550-7069 E-Mail: rhansson@sdge.com
Responder:	Sheridan Pauker, Partner Keyes & Fox LLP Phone: (510) 314-8202 E-mail: spauker@keyesfox.com Counsel for SD CCAs
Request Date:	July 28, 2026
Date Sent:	August 11, 2026

GENERAL OBJECTIONS

1. The SD CCAs object to the instructions and definitions in SDGE-CEA-DR-01 (the "Requests") to the extent they supplement, modify, or exceed the scope of the requirements of Article 10 of the Commission's Rules of Practice and Procedure, applicable Assigned Commissioner or Administrative Law Judge's rulings, or the procedural schedule governing this proceeding. The SD CCAs do not waive, and expressly preserve, all rights to limit their responses to information that is properly discoverable under Commission Rules.

2. The SD CCAs object to the Requests to the extent they seek information or documents protected as a confidential attorney-client communication and/or attorney work product or are otherwise confidential, proprietary or sensitive data, trade secrets and information.

3. The SD CCAs object to the Requests to the extent they request legal conclusions, legal contentions, strategic judgments, or internal deliberative analyses or opinions rather than facts, and are therefore not a proper subject for discovery and may be protected as a confidential attorney-client communication or by the attorney work product doctrine.

4. The SD CCAs object to the Requests to the extent they are overbroad, unduly burdensome, or disproportionate to the needs of this proceeding, including Requests that seek information not reasonably calculated to lead to the admission of discoverable evidence or that would require unreasonable effort or expense to respond.

5. The SD CCAs object to the Requests as unduly burdensome to the extent they seek information that will be provided in the SD CCAs' forthcoming testimony on the same subject.

6. The SD CCAs object to the Request as unduly burdensome to the extent they require the SD CCAs to compile and produce materials that are already publicly reported and equally accessible to the requesting party.

7. The SD CCAs object to the Requests to the extent they impose obligations that exceed Commission procedural requirements, including, but not limited to, requests that:

a. Require the creation of new analyses, studies, summaries, or compilations not otherwise maintained in the ordinary course of business;

b. Seek narrative explanations, justifications, or legal analyses beyond what is required by Commission Rules; and

c. Demand a level of detail or documentation not contemplated by the Commission's discovery framework.

8. The SD CCAs object to the Requests to the extent they are vague, ambiguous, or insufficiently specific as to subject matter, time period, or definitions, such that the SD CCAs cannot reasonably determine what information is requested.

By responding to any of these Requests, the SD CCAs do not concede the relevance, materiality, or admissibility of any information provided, nor do they waive any objection as to any other use of such information in this proceeding.

PRELIMINARY STATEMENT

The SD CCAs' responses to the Requests are made to the best of their present knowledge, information, and belief and subject to and limited by the objections herein. The SD CCAs have not concluded its investigation of the facts related to this proceeding. The following responses are, at all times, subject to such additional or different information as discovery or further investigation may disclose. Therefore, the following responses and objections are given without prejudice to the SD CCAs' right to rely on subsequently discovered or recalled information and evidence. The SD CCAs specifically reserve the right to make use of, or to introduce at any hearing, information and/or document responsive to the following requests that is discovered or recalled subsequent to the date of these responses, including, without limitation, any information or documents obtained in discovery or by further investigation of this matter. Capitalized terms not defined herein are defined in the Requests, the Application or SDG&E's testimony served in this Application.

REQUESTS & RESPONSES

Request 1

Do the SD CCAs plan to design LMS-compliant demand flexibility rates?

a. If not, please describe all the reasons why the SD CCAs do not plan to design LMS-compliant demand flexibility rates?

Response 1
The SD CCAs object to this Request to the extent it requests legal conclusions, legal positions, strategic judgments, or internal deliberative analyses or opinions regarding the SD CCAs' compliance with applicable law and regulations relating to the LMS, rather than facts, and are therefore not a proper subject for discovery and may be protected as a confidential attorney-client communication or by the attorney work product doctrine. The SD CCAs further object to this Request to the extent it seeks information or documents protected as a confidential attorney-client communication and/or attorney work product or are otherwise confidential, proprietary or sensitive data, trade secrets and information. The SD CCAs further object to this request as unduly burdensome to the extent it seeks production of information that is already publicly reported and equally accessible to the requesting party.

Subject to and without waiving these objections, the SD CCAs respond as follows:

The SD CCAs refer SDG&E to their publicly-filed LMS compliance plans available in California Energy Commission ("CEC") docket number 23-LMS-01. The SD CCAs are actively engaged in A.26-02-001 to advocate on behalf of CCA customers with respect to the Proposed DF Rates. The SD CCAs seek to collaborate with SDG&E to resolve the SD CCAs' concerns regarding the Application as expressed in their Protest and forthcoming testimony in a satisfactory manner that serves their customers' interests.

Request 2

CEA stated in LMS Compliance Plan, submitted to the CEC on April 30, 2026, that "CEA plans to participate in and offer SDG&E's Real Time Pricing Pilot rates to eligible CEA customers once the pilot is implemented." Given that CEA does not offer SDG&E rates to its customers, please explain what CEA means by this statement.

Response 2
The SD CCAs object to the Request as unduly burdensome to the extent it requires the SD CCAs to compile and produce materials that are already publicly reported and equally accessible to the requesting party.

Subject to and without waiving the foregoing objections, CEA responds as follows:

Request 2 incorrectly references an older version of CEA's LMS Compliance Plan, which has since been revised. CEA's revised LMS Compliance Plan, filed May 11, 2026, changed this sentence to read as follows:

"CEA plans to participate in SDG&E's Real Time Pricing Pilot and offer eligible CEA customers marginal cost based rates once the pilot is implemented."[1]

The revision to CEA's LMS Compliance Plan was prompted by SDG&E. In correspondence

[1] CEA, Load Management Standards (May 11, 2026) at 12 (emphasis added).

from CEC staff to CEA dated May 11, 2026, CEC informed CEA that on May 8, 2026, SDG&E communicated to CEC its concern that the sentence in CEA's LMS Compliance Plan dated April 30, 2026, quoted in Request 2, could lead to misinterpretation that CEA would be offering SDG&E's generation rates to CEA's customers. Based on this communication, CEC requested that CEA revise the sentence to read as quoted above from CEA's revised LMS Compliance Plan dated May 11, 2026.

As further context to this statement, CEA's expectation was that SDG&E would offer a real-time pricing import rate pilot, similar to pilots offered by the other large IOUs pursuant to D.21-12-015 and D.24-01-032, after a Commission decision addressing the CCA data access issues between the SD CCAs and SDG&E that need to be resolved before the SD CCAs can make a good-faith effort to offer dynamic rates and participate in pilots offered by SDG&E.[2]

Request 3

How do the SD CCAs plan to use customer interval meter data for purposes of any future demand flexibility rate?

Response 3
The SD CCAs object to the Request as unduly burdensome to the extent it seeks information that will be provided in the SD CCAs' forthcoming intervenor testimony to be filed on September 11, 2026, on the same subject. In such intervenor testimony, the SD CCAs plan to expand upon their Protest and provide additional detail as to the importance of timely customer interval meter data in dynamic rate design and implementation and ways in which the SD CCAs seek to be enabled to utilize such data, should the issues raised in their Protest be resolved in this Application. SD CCA staff and counsel drafting and preparing such testimony are the same as those responding to this discovery request, and therefore the Request places an undue burden on the SD CCAs in light of staffing, time, and resource constraints in light of the near-term deadline for such testimony, just one month from the requested date for this data response. SDG&E will have the opportunity to seek follow-up discovery, if necessary, following service of the SD CCAs' intervenor testimony.

Request 4

The SD CCAs state in their March 5, 2026 protest in the instant proceeding that "[t]he SD CCAs must ensure that they and their customers have access to granular, real-time interval usage data so that the CCAs, as load-serving entities, and their customers, which may take service under the Proposed DF Rates, can make the most of the state-mandated DF programs."[31]

a. What do the SD CCAs consider "real-time" in this context?

[2] *See* D.23-11-006, *Decision Adopting Dynamic Export Rate Pilot and Dismissing Application for a Real Time Pricing Rate Pilot* (Nov. 2, 2023), Finding of Fact 4 ("SDCP and CEA will not offer a dynamic rate to its customers until the Commission addresses the issue of data access for offering dynamic rates to CCA customers in a decision.").
[3] SD CCA Protest at 3.

b. Using the SD CCAs definition of "real-time," how do the SD CCAs anticipate using the "granular, real-time interval usage data" to "make the most of the state-mandated programs"?

c. Assuming the SD CCAs receive "granular, real-time interval usage data" (using the SD CCAs definition of "real-time" as described above), please describe how the SD CCAs plan to use the data to design a DF commodity rate.

d. Assuming the SD CCAs receive "granular, real-time interval usage data" (using the SD CCAs definition of "real-time" as described above), please describe how the SD CCAs plan to use the data to implement a DF commodity rate.

e. Assuming the SD CCAs receive "granular, real-time interval usage data" (using the SD CCAs definition of "real-time" as described above), please describe how the SD CCAs plan to use the data to provide a DF commodity rate on an on-going basis for SD CCA customers post-implementation.

f. How do the SD CCAs plan to use "real-time" customer interval usage data to assist customers with understanding their rates and managing their load?

Response 4

The SD CCAs object to each of the Requests as unduly burdensome to the extent they seek information that will be provided in the SD CCAs' forthcoming intervenor testimony to be filed on September 11, 2026 on the same subject. In such intervenor testimony, the SD CCAs plan to define "near real-time" in the context of customer interval meter data access. The SD CCAs also plan to discuss data access parity as between SDG&E and the SD CCAs. As noted above, the SD CCAs plan to expand upon their Protest and provide additional detail as to the importance of timely customer interval meter data in dynamic rate design and implementation and ways in which the SD CCAs seek to be enabled to utilize such data, should the issues raised in their Protest be resolved in this Application. SD CCA staff and counsel drafting and preparing such testimony are the same as those responding to this discovery request, and therefore the Request places an undue burden on the SD CCAs in light of staffing, time and resource constraints in light of the near-term deadline for such testimony, just one month from the requested date for this data response. SDG&E will have the opportunity to seek follow-up discovery, if necessary, following service of the SD CCAs' intervenor testimony.

Request 5

The SD CCAs state in their March 5, 2026 protest in the instant proceeding that the "lack of timely access to sufficient customer energy usage data meaningfully hinders CCA customer participation . . ."[4] Please describe the reasons why lack of timely access to sufficient customer

[4] SD CCA Protest at 9.

energy usage data would hinder CCA participation in a DF rate?

a. Please specify which of these reasons would meaningfully hinder CCA customer participation in a DF rate?

Response 5
The SD CCAs object to the Request as unduly burdensome to the extent it seeks information that will be provided in the SD CCAs' forthcoming intervenor testimony to be filed on September 11, 2026 on the same subject. In such intervenor testimony, the SD CCAs plan to expand upon their Protest and provide additional detail as to the importance of timely customer interval meter data in dynamic rate design and implementation and ways in which the lack of such data access and data parity compromise CCA customer participation in the Proposed DF Rates and dynamic rates more generally. SD CCA staff and counsel drafting and preparing such testimony are the same as those responding to this discovery request, and therefore the Request places an undue burden on the SD CCAs in light of staffing, time and resource constraints in light of the near-term deadline for such testimony, just one month from the requested date for this data response. SDG&E will have the opportunity to seek follow-up discovery, if necessary, following service of the SD CCAs' intervenor testimony.

END OF RESPONSE