

CENTER FOR ACCESSIBLE TECHNOLOGY DATA REQUEST – SDG&E RESPONSE

Data Request #01

SDG&E RESIDENTIAL UNTIERED ELECTRIFICATION RATE - A.21-09-001

DATE RECEIVED: November 12, 2021

DATE RESPONDED: December 1, 2021

General Objections:

SDG&E objects to the definitions and instructions included in this data request on the grounds that they are overbroad, unduly burdensome, and seek information that is irrelevant to the subject matter involved in the pending proceeding and/or not reasonably calculated to lead to the discovery of admissible evidence, and therefore, beyond the requirements of CPUC Rule of Practice and Procedure 10.1. SDG&E also notes that special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

1. CforAT is providing a copy of testimony from PG&E developed in A20-10-006, PG&E’s Application for the Commission to adopt a medical discount for the utility’s untiered TOU rates in conjunction with these Data Requests. Following the methodology described in PG&E’s discussion of estimating its customers’ average medical discount percentage (pages 1-9 through 1-11 of the attached testimony), please calculate the average discount received by SDG&E’s existing Medical Baseline customers on tiered rates (including tiered TOU rates).

SDG&E Response:

SDG&E objects to the request on the grounds that it would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist. Notwithstanding the foregoing objections, SDG&E responds as follows:

See responses to questions 2 and 3.

2. Please provide a table comparable to Table 1-4 in PG&E’s attached testimony (page 1-11) showing SDG&E’s estimated value of medical discounts

SDG&E Response:

SDG&E objects to the request on the grounds that it would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist. Notwithstanding the foregoing objections, SDG&E responds as follows:

Number Of MB Customers	A	32,302
Annual kWh Consumption	B	229,269,148
Annual Average kWh Consumption/ MB Customer	C = B/A	7098
Monthly Average kWh Consumption/ MB Customer	D = C/12	591
Revenue if no MB Program	E	\$ 87,934,827
Revenue with MB Program	F	\$ 65,311,472
Value of MB Program (\$/year)	G = E-F	\$ 22,623,355
Value of MB Discount (%)	H	25.7%

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Average Bill (600 kWh, TOU-DR-1)	I	\$ 226.36
Average Discount	J = H*I	\$ 58.24
Average Bill with MB Discount	K= I-J	\$ 168.12

SDG&E notes that the methodology used in PG&E’s table may not be directly comparable to SDG&E’s methodology. As such, conclusions drawn by PG&E around the value of the existing program, and the corresponding discount PG&E proposes in their testimony, cannot be directly applied to SDG&E’s testimony.

3. Please provide all workpapers used in developing the responses to Questions 1-2, above.

SDG&E Response:

See attached file titled “A.21-09-001_CforAT-DR 001.xlsx”