

1814 FRANKLIN STREET
SUITE 720
OAKLAND, CALIFORNIA
94612



TEL 510.834.1999
FAX 510.834.0918
mrw@mrwassoc.com

Via electronic mail

March 2, 2015

Parina Parikh
Regulatory Case Manager
San Diego Gas & Electric Company
8330 Century Park Court
San Diego, CA 92123-1550

Re: Application 14-04-014

Dear Ms. Parikh:

Enclosed is Data Request No. 1 of ChargePoint, Inc. in the above proceeding. The data responses should be provided by March 11, 2015 to:

Ms. Lynn Haug
Ellison Schneider & Harris
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816
Telephone: (916) 447-2166
Email: lmh@eslawfirm.com

William A. Monsen
MRW & Associates, LLC
1814 Franklin Street, Suite 720
Oakland, CA 94612
Tel: (510) 834-1999
Fax: (510) 834-0918 (f)
Email: wam@mrwassoc.com

In the event there are any objections to any of the attached requests, please direct the objections to us within three (3) working days from receipt of this data request. Objections should be as specific and detailed as possible to facilitate resolution.

Thank you for your assistance in this matter; please call me with any questions.

Very truly yours,

/s/

William A. Monsen
Consultant to ChargePoint, Inc.

Attachment

{00277936;1}

**First Data Request from ChargePoint, Inc.
To San Diego Gas & Electric Company in A.14-04-014**

General Instructions:

1. Please provide responses to all questions as they become available, with full responses delivered by March 11, 2015.
2. Please provide all relevant and responsive information available in response to each data request.
3. Please identify the person responding to the data request on the response.
4. For each data request, please identify each San Diego Gas & Electric Company (“SDG&E”) employee consulted in formulating answers to the data request.
5. For each data request, please identify all documents referenced in responding to these data requests.
6. Please start the response to each question on a new page.
7. Please include a copy of the question that the response addresses as well as the response to the question.
8. Please provide responses in electronic format as well as hard copy (unless the response consists of significant paper records, in which case paper responses to that specific question are acceptable).
9. Please provide electronic responses on CD-ROM or as attachments to electronic mail.
10. For responses that consist of numerical data, please provide the data in a form readable by Microsoft Office Excel 2007 for Windows.
11. If the response consists of spreadsheets, please assure that all formulae in the spreadsheets are intact.
12. Please mark “Confidential” any information in the data request responses that SDG&E considers to be confidential.
13. Please provide the responses to questions as they become available, rather than waiting until all responses can be sent.
14. If any of the information sought in a data request will not be available by the response date for that request, please state the projected date on which such information will become available and the reason(s) for delay.
15. These are all ongoing requests. Accordingly, please provide supplemental responses to a data request as soon as further information is obtained that is responsive to the request.

**First Data Request from ChargePoint, Inc.
To San Diego Gas & Electric Company in A.14-04-014**

DATA REQUEST

1. Please provide all workpapers associated with SDG&E’s application, testimony, and supplemental testimony.
2. Please provide copies of all data request responses provided by SDG&E in this proceeding. Include in this response all responses and spreadsheets and other materials included in your responses. Please ensure that all spreadsheets have formulae and links intact. Please provide these responses via CD or DVD.
3. On page ST-10, line 7, Mr. Pulliam indicates that “To the greatest extent possible, SDG&E intends to contract with third parties...” Please explain under what circumstances SDG&E would not “contract with third parties...”
4. Refer to page ST-15, line 9 through ST-16, line 2. Please provide the typically expected duration for charging PEVs using Level 1, Level 2, and DCFC EVSEs.
5. Please provide SDG&E’s forecast of the timing and quantity of different types of EVSEs not located at single family residences as of the end of the years 2015-2018. Please complete the response in a format consistent with the following table:

	Year			
	2015	2016	2017	2018
SDG&E- Owned Level 1				
SDG&E- Owned Level 2				
SDG&E- Owned DCFC				
Publicly- Owned Level 1				
Publicly- Owned Level 2				
Publicly- Owned DCFC				
Privately- Owned Level 1				
Privately- Owned Level 2				
Privately- Owned DCFC				

For the SDG&E-owned EVSEs, please include both EVSEs currently owned by SDG&E as well as EVSEs that SDG&E proposes to own under the Pilot.

**First Data Request from ChargePoint, Inc.
To San Diego Gas & Electric Company in A.14-04-014**

6. Refer to page ST-27, line 14. Please provide workpapers supporting your estimate of HHI of "...about 4,200...".
7. Please confirm that the tables presented in Appendix 2-3 present results for the end of year 2015 market shares. If the tables are for any other date, please so state and provide support for your response.
8. Refer to page ST-30, line 4. Please provide workpapers supporting your estimate of the decrease in market concentration "...from about 4,200 to about 3,200 in this scenario." Please provide tables similar to those found in Appendix 2-3 to support your calculations.
9. Refer to page ST-30, footnote 56. Please provide workpapers supporting the estimate of 9.43% of California's PEVs are in the San Diego area. Please provide SDG&E's forecast of future percentages of PEVs in the San Diego area for the years 2015-2018.
10. Refer to page ST-31, lines 1-2. Please confirm that this assumes that SDG&E does not own any more than 5,500 EVSEs in 2025.
11. Refer to page ST-31, lines 1-2. Is SDG&E willing to commit to not obtaining more than 5,500 EVSEs after 2018? If your response is anything except for an unqualified "yes," please explain your response.
12. Please provide all workpapers supporting Appendix 2-3 to Mr. Pulliam's testimony. Provide these workpapers in Excel format with all links live and formulae intact.
13. Please provide workpapers that were used to derive the EVSE Location and EVSE Units shown in Appendix 2-3 from the AFDC data referred to in the notes in Appendix 2-3.
14. Refer to page ST-7, line 14. Does your statement "It is not an open-ended business venture." imply that SDG&E does not plan to expand the number of EVSEs that it owns beyond the 5,500 EVSEs in the Pilot? Is SDG&E willing to commit to such a limitation? If not, please explain why not.