**DATA REQUEST**

1. Please provide all public and confidential workpapers supporting SDG&E’s rebuttal

testimony served on May 4, 2020. Please include all revenue allocation, rate design and

streetlight rate models that support SDG&E’s rebuttal testimony.

**SDG&E Response:** Public workpapers can be found on SDG&E’s website, at the following link: https://www.sdge.com/rates-and-regulations/proceedings/2019-grc-phase2

Confidential workpapers have been served to parties under signed non-disclosure agreements, on May 22, 2020.

2. Please provide workpapers supporting witness Stein’s claim of an undercollection of $10

million in 2019 attributed to schedule DG-R (see Stein rebuttal testimony, page JPS-25).

Provide workpapers in Excel format with all links active and all formulae intact.

**SDG&E Response:** SDG&E’s support for this statement has already been provided to the City as a follow up to Energy Division data request #ES3.

3. Please update SDG&E’s response to City of San Diego Data Request 1, Question 4 so

that the response is consistent with SDG&E’s updated rate proposals from its rebuttal

testimony.

**SDG&E Response:** SDG&E will provide this confidential response to the City of San Diego in a separate email.

4. Does Witness Stein have an estimate of the magnitude of the increased undercollection

associated with opening Schedule DG-R as proposed by SEIA witness Beach? If not,

please so state. If so, please provide workpapers associated with any such estimate.

**SDG&E Response:**

SDG&E has not estimated the undercollection associated with opening Schedule DG-R as proposed by SEIA.

5. Regarding witness Stein’s rebuttal testimony on page JPS-31:

a. Confirm or deny: PG&E and SCE have critical peak pricing programs.

b. Confirm or deny: PG&E and SCE have grandfathered TOU rates.

c. Confirm or deny: PG&E and SCE do not have separate commodity tariffs as does

SDG&E.

**SDG&E Response:**

SDG&E objects to this request to the extent that it seeks information that is not within SDG&E’s knowledge or control, is not within the scope of the proceeding, and/or is publicly and equally available to the City of San Diego.

6. Please explain how SDG&E developed the “San Diego Franchise Fee Differential

Percentage Factors” found in tab “Inputs” in SDG&E’s electric rate design model. Please

provide all workpapers supporting the development of those factors.

**SDG&E Response:**

SDG&E objects to this request to the extent it seeks information regarding matters that are not relevant to and are not within the scope of the proceeding.

Subject to and without waiving the foregoing objections, SDG&E responds as follows: The San Diego Franchise Fee Differential Percentage Factors found in SDG&E’s workpaper tab “Inputs” is used for the presentation of revenues SDG&E expects to collect on behalf of the City of San Diego. The percentage factors are not used in the calculation of rates. The percentage amounts will vary from the one listed on SDG&E’s tariffs (5.78%) as not all customers in SDG&E’s service territory live in the City of San Diego, thus they are not charged the San Diego Franchise Fee Differential.

7. Please explain how the “San Diego Franchise Fee Differential Percentage Factors”

mentioned in Question 6 relate to the 5.78% “Franchise Fee Differential” that SDG&E

applies to each of its electric tariffs. Please provide a quantitative demonstration of how

these relate to each other.

**SDG&E Response:**

SDG&E objects to this request to the extent it seeks information regarding matters that are not relevant to and are not within the scope of the proceeding.

Subject to and without waiving the foregoing objections, SDG&E responds as follows: Please see the response to Question 6. Please also see SDG&E’s approved Franchise Fee Differential via Advice Letter 1460-E. http://regarchive.sdge.com/tm2/pdf/1460-E.pdf

8. Please provide workpapers presenting the calculation of the Franchise Fee and

Uncollectible factor for electric used in this proceeding.

**SDG&E Response:**

SDG&E objects to this request to the extent it seeks information regarding matters that are not relevant to and are not within the scope of the proceeding.

Subject to and without waiving the foregoing objections, SDG&E responds as follows: Please see the embedded workpapers from SDG&E’s GRC Phase 1. See Exhibits SDG&E-35-2R, Section V; SDG&E-35-WP-2R, p. 26-27 and Exhibit SDG&E-18, Section IV.

  

9. Please provide workpapers presenting the calculation of the Franchise Fee Factor for

electric of 3.4668% that SDG&E proposed in A.17-10-007 (i.e., SDG&E’s GRC Phase 1

application).

**SDG&E Response:**

SDG&E objects to this request to the extent it seeks information regarding matters that are not relevant to and are not within the scope of the proceeding.

Subject to and without waiving the foregoing objections, SDG&E responds as follows: Please see the embedded workpapers from SDG&E’s GRC Phase 1. See Exhibits SDG&E-35-2R, Section V, and SDG&E-35-WP-2R, p. 26-27.

 

10. For each year 2014 to 2018 inclusive, please state the average aggregate of franchise,

general business license, or special taxes (including without limitation thereto, Utility Users Taxes) and/or fees placed upon SDG&E by local governmental entities including

the City of San Diego.

**SDG&E Response:**

SDG&E objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that it seeks information regarding matters that are not relevant to and are not within the scope of the proceeding and on grounds that the burden, expense and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence.

11. For each year 2014 to 2018 inclusive, please state the average aggregate of franchise,

general business license, or special taxes (including, without limitation thereto, Utility

Users Taxes) and/or fees placed upon SDG&E by local governmental entities excluding

the City of San Diego.

**SDG&E Response:**

SDG&E objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that it seeks information regarding matters that are not relevant to and are not within the scope of the proceeding, and on grounds that the burden, expense and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence.

12. For each year from 2014 to 2018 inclusive, please provide the amount of electric

franchise fees that SDG&E has paid to each local governmental entity. In addition, please

provide the data and computations supporting each calculation as well as the definitions

of each data item used in the computations. Also state whether the franchise fee for each

local governmental entity is based on (1) the “Broughton Act” formula or (2) the “Percent

of Gross Receipts” formula.

**SDG&E Response:**

SDG&E objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that it seeks information regarding matters that are not relevant to and are not within the scope of the proceeding, and on grounds that the burden, expense and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence.

13. For each year 2014 to 2018 inclusive, please state the amount general business license, or

special taxes (including without limitation thereto, Utility Users Taxes) and/or fees

SDG&E has paid to local governmental entities including the City of San Diego.

**SDG&E Response:**

SDG&E objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that it seeks information regarding matters that are not relevant to and are not within the scope of the proceeding, and on grounds that the burden, expense and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence.

14. For each year from 2014 to 2018 inclusive, please provide the amount of electric

franchise fees that customers of each local governmental entity have paid to SDG&E

through rates. In addition, please provide the data and computations supporting each

calculation.

**SDG&E Response:**

SDG&E objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that it seeks information regarding matters that are not relevant to and are not within the scope of the proceeding, and on grounds that the burden, expense and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence.

15. In SDG&E’s GRC Phase 1, SDG&E’s tax witness indicated that the Electric Franchise

Fee factor was 3.4468%. Please provide all data supporting the development of this

Franchise Fee factor. Does this factor include payments of surcharges, Utility Users

Taxes, general business licenses, or other special taxes paid to local governmental entities

by SDG&E? If so, please provide a list of all such payments to each city, county, or other

entity as well as the amounts paid annually to each of those entities for the years 2014-

2018 inclusive. Also provide a definition for each factor used in these calculations (e.g,the specific definition of gross receipts for each entity).

**SDG&E Response:**

SDG&E objects to this request pursuant to Rule 10.1 of the Commission’s Rules of Practice and Procedure, on the grounds that it seeks information regarding matters that are not relevant to and are not within the scope of the proceeding, and on grounds that the burden, expense and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence.