**DATA REQUEST**

1. Please provide the estimated costs, both initial and recurring, for SDG&E to develop a set

of APIs that push a real-time pricing (RTP) signal (e.g., day-ahead, fifteen-minute

market, real time at the DLAP or LMP) to anyone who would like to subscribe to the

API. Please also provide the estimated costs for providing machine-readable digital

tariffs, including ones that change up to every five minutes.

**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 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.

2. Please provide the estimated costs for SDG&E to modify its billing infrastructure so that

it may bill customers who are on an RTP rate. For simplicity, please assume that the

UDC components of a customer’s bill would remain unchanged. The EECC component

would be broken into two line items: one that assumed energy costs billed at an RTP and

another that would charge the customer for costs associated with procuring generation

capacity and fulfilling RPS obligations. Please note that the latter could be one or two

line items.

**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 the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence.

3. Please provide the estimated costs, per meter, to reprogram the meter to 15 minutes (as

opposed to the default 60 minutes) of any residential customer who chooses to opt-into

the RTP rate.

**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 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.

4. Please provide the estimated costs, per meter, to reprogram a customer’s meter to 5

minute interval reads and the cost of any back-end work that would need to be performed

to enable billing on a 5-minute basis.

**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 the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, SDG&E answers as follows: Please see the testimony of Tishmari Lewis (Chapter 2) of A.18-11-017 for a discussion on this topic.

5. Please describe whether SDG&E has a process to share data (e.g. interval data and

customer data) with third parties that would provide services to help customers on the

RTP rate manage their electricity usage? If there is not a pathway, what cost would there

be to open a data sharing pathway to third parties (e.g. utilizing the existing Consent to

Share process)?

**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 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.

6. Chapter 6 of SDG&E’s Second Revised Testimony shows a total proposed marginal

energy cost of $653,884,073. Scaled up using the EPMC factor, this total is

$920,049,517. Please clarify how much of this total marginal energy cost is the RPS

premium?

**SDG&E Response:** SDG&E’s RPS premium used the 2019 market price benchmark of $26.95/MWh applied to the 33% RPS target for 2020. This accounts for $133 million of the proposed marginal energy cost (MEC) of $653,884,073. The approximate $266 million difference between the scaled up total MEC and the proposed MEC can largely be attributed to the actual costs and volume of SDG&E’s renewable contract portfolio.

7. What is the total undercollection, if any, that SDG&E estimates has occurred under the

Vehicle Grid Integration (VGI) Pilot Program? If any undercollection has occurred,

please disaggregate the undercollection by billing determinant. What is the average undercollection per kWh sold under Schedule VGI?

**SDG&E Response:** SDG&E does not track revenue under-/over-collections associated with Schedule VGI rates.