

San Diego Gas & Electric Company
Residential Default TOU RDW
Application 17-12-013
Energy Division Data Request 02 dated March 20, 2018
SDG&E Response Dated: April 4, 2018

SDGE ED 02:

In Chris Bender's testimony, Chapter 6, page CB-15, lines 6-7, he states that "Based on the CIS replacement schedule, it is critical that the Mass TOU Default transition is completed by December 2019, to ensure there is no overlap into the design phase." However, the figure outlining the CIS replacement schedule (provided on page CB-15, line 5), shows the design phase occurring from Q1 2019 to Q3 2019, which overlaps entirely with SDG&E's proposed default transition timeline of March to December 2019. The construct/build phase similarly has substantial overlap with SDG&E's proposed timeline. Only the test and implementation phases are scheduled to occur after December 2019.

Did Mr. Bender intend to say that SDG&E needs to ensure there is no overlap into the test phase? If so, it appears from the figure that the test phase does not begin until the latter part of Q1 2019 – what then prevents SDG&E from extending the default transition into the beginning of Q1 2020?

If Mr. Bender did indeed mean that SDG&E needs to ensure there is no overlap into the design phase, can he please explain the apparent overlap with SDG&E's proposed transition timeline of March to December 2019?

SDG&E Response to SDGE ED 02:

Mr. Bender did intend to say that SDG&E needs to ensure there is no overlap into the CIS Test Phase.¹

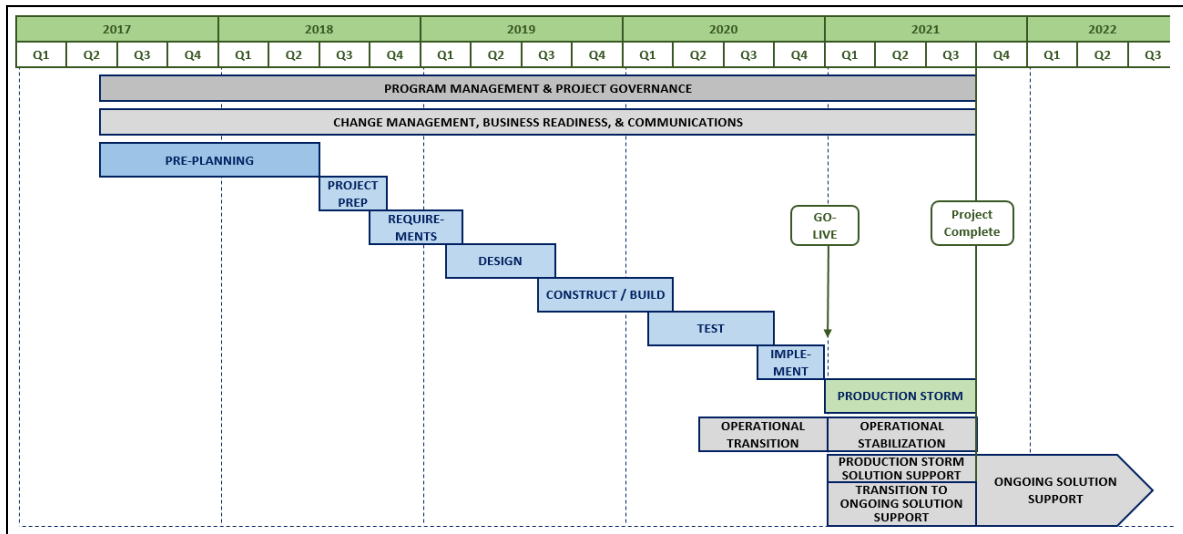
SDG&E has been very thoughtful and deliberate in planning the schedules for both mass default TOU and its CIS Replacement program. These schedules were put together to optimize system stability, operational effectiveness, and the overall customer experience. As explained below, managing risk around the timing of the efforts is key to the success of both implementations.

For ease of reference, the proposed CIS Replacement Program Schedule (provided on page CB-15, line 5) follows.

¹ To ensure other parties are aware of the need to correct Mr. Bender's testimony, this data request response is being served on the service list for this proceeding. In addition, at an appropriate time before or during hearings, a corrected version of Mr. Bender's prepared Direct Testimony, reflecting this and any other necessary corrections, will be served on the service list.

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CIS Replacement Program Schedule



There are two key risks that make it unwise for SDG&E to extend the major² part of Mass TOU Default transitions into Q1 2020.

1. The first risk is that the Mass TOU Default transition would overlap with the CIS Test Phase that is scheduled to begin early in Q1 2020. During the Test phase, SDG&E will be performing extensive testing of its new SAP system, including a detailed review of customer bills through a bill comparison process. The bill comparison process will consist of comparing actual bills generated in SDG&E's legacy CIS and using the same data to generate corresponding bills in the new SAP system. The bill comparison process will not be effective if a significant number of rate changes occur during the process. The bill comparison process is critical, as it will identify any discrepancies with calculations or line items, and thus help to ensure the new SAP system is configured correctly when it goes live in January 2021.
2. The second risk is insufficient resourcing for SDG&E during 2020. Throughout 2020, SDG&E's Customer Service and IT employees will be receiving extensive training on the new SAP system to properly prepare for when the system goes live. This process will occur in waves so that the existing operations are not impacted due to employees being pulled off line for training. This training process is critical to the success of the new SAP implementation and will require

² Major is defined as the TOU transition of approximately 750,000 eligible residential customers between March 2019 and December 2019.

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that employees are available and not pulled off to support other key initiatives, such as necessary tasks to implement mass default TOU rates.