1. Please provide SDG&E’s complete workpapers for the application. Where possible, please provide SDG&E’s workpapers electronically, and preferably in Excel with all formulas intact.

**SDG&E Response:** Workpapers for the application and testimony can be viewed at <https://www.sdge.com/rates-and-regulations/proceedings/ev-high-power-charging-rate>

1. At page BS-11, Line 17-19, SDG&E states that “If the customer’s maximum demand continues to exceed their subscription level after another two months SDG&E will reset their subscription level to align with the customer’s actual demand.” Would this reset only occur if the customer exceeds their subscription level in all three months?’

**SDG&E Response:** Yes, the customer’s subscription level will be reset to the higher level only if the customer’s maximum demand exceeds their current subscription level in all three consecutive months. In addition, the subscription level will be reset to a higher level if the customer’s maximum demand exceeds the subscribed demand for six or more months (non-consecutive) in a rolling 12-month period.

1. At page BS-13, Line 11, SDG&E states that the 10-year phase down will begin in the year the EV-HP rate is introduced. Does this mean that SDG&E would immediately change the subscription charge reduction from 50% to 55% when the EV-HP rate is introduced, or would the subscription charge reduction remain at 50% for one full year after introduction of the EV-HP rate?

**SDG&E Response:** The subscription charge discount will be 50% for the first year after the introduction of the EV-HP rate, and will step down to 45% in the subsequent year. The initial 50% discount is intended to be for one year however it may vary to align with existing planned rate changes so as not to introduce too many rate changes within a short period of time that could confuse customers.

1. To the extent not already provided in response to question 1, please provide SDG&E’s calculation of estimated monthly bills for various sample customer types enrolled in the proposed EV-HP rate. See page PK-1, lines 20-22. Please also include SDG&E’s calculation s of estimated costs on these customers’ existing rates, and SDG&E’s estimated bill impacts (i.e. workpapers for the bill impacts discussed on pages PK-2 to PK-10).   
     
   **SDG&E Response:** Workpapers provided in response to Question 1.
2. To the extent not already provided in response to question 1, please provide SDG&E’s complete cost allocation and electric rate design models used to develop SDG&E’s proposed EV-HP rates.  
     
   **SDG&E Response:** Workpapers provided in response to Question 1.
3. To the extent not already provided in response to question 1, please provide SDG&E’s sales forecasts, and billing determinants, that were used to develop the proposed EV-HP rate.   
     
   **SDG&E Response:** Workpapers provided in response to Question 1.
4. This question seeks to better understand the implications of SDG&E’s proposed subscription rates for the proposed EV-HP rate.
   1. Has SDG&E’s rate design accounted for extra revenues from unused subscription capacity (e.g. if a customer subscribes to 25 kW of capacity but only uses 20 kW)? If so, how?  
        
      **SDG&E Response:** The first subscription charge increment (i.e., the first tranche from 0 kW to 25 kW) is half the cost of subsequent increments. The first subscription charge increment is based on 12.5 kW of demand. Subsequent tranches of 25 kW will stack on top of the first tranche and therefore the total subscription charge paid by the customer incorporates this initial tranche of 12.5 kW of demand, regardless of where in the final tranche the customer’s maximum demand actually lands.

In the above example since the customer is only subscribed to a single 25 kW subscription increment and has a maximum demand of 20 kW, their subscription charge is based on an assumed 12.5 kW of demand.

* 1. To the extent customers will exceed their subscribed amount of capacity, please provide SDG&E’s forecast of the amount of overage capacity that customers will utilize.   
       
     **SDG&E Response:** SDG&E did not perform this forecast.
  2. Please confirm that SDG&E does not propose to charge a higher subscription charge rate to the extent that customer’s exceed their subscribed capacity amount.  
       
     **SDG&E Response:** If a customer’s maximum demand exceeds their subscription level for over three consecutive months or six non-consecutive months in a rolling 12-month period, their subscription level will be raised to a level consistent with their maximum demand. No penalty will be charged in this instance.

1. Page BS-12 provides an example of a customer that has a maximum demand of 57 kW if three 19 kW chargers are used simultaneously. SDG&E observes, at lines 15-17 of page BS-12, that the customer could subscribe to only two 25 kW subscription tranches (i.e. 50 kW), if it prefers to use load management strategies like staggered charging or demand management software to ensure load does not exceed 50 kW. SDG&E also notes, at Line 2 of page BS-14, that the customer also may choose to utilize behind-the-meter storage, in order to manage their demand.
   1. Does SDG&E have an estimate of the expected capital cost of battery storage? If so, please provide it, along with any supporting information regarding the source of SDG&E’s estimate.  
        
      **SDG&E Response:** SDG&E did not perform an analysis of the cost of using battery storage to reduce the subscription charge on the proposed EV-HP rate.
   2. Does SDG&E have an estimate of the annual cost of using energy storage to manage load, as described in the example? If so, please provide SDG&E’s calculation of what a customer should expect to spend in annual expenses to utilize battery storage in order to achieve the 7 kW reduction in maximum demand that is discussed in the example.   
        
      **SDG&E Response:** See response to Question 8.a.