1. Question 5 in EYCEJ/CCAEJ-SDG&E-DR-01 requested the basis of SDG&E’s estimate of the EVSE counts in the MD/HD EV program. SDG&E’s response states, in part, “Vehicle classes were weighted based on a number of factors.” Please identify each factor and identify how each factor was weighted.

**SDG&E Response:**

SDG&E’s use of the term weighting was intended to mean that numerous factors will be considered, not that a formal weighing formula would be used. SDG&E considered electric vehicles that were generally in the market during the time of filing, the state of the market at application filing time, and announcements of future vehicle offerings to estimate which vehicles may proliferate over the coming years. Relatively mature vehicle classes such as delivery trucks and transit buses were assumed to be adopted sooner. Transit buses and school buses are also considered “beachheads” which have the ability to accelerate adoption of HD EVs.

It is important to note that the MD/HD program is designed to be flexible. EVSE deployment will be customer driven within the vehicle classes. The estimated EVSE counts within vehicle categories was used to construct an estimated budget.

1. Question 5 in EYCEJ/CCAEJ-SDG&E-DR-01 requested the basis of SDG&E’s estimate of the EVSE counts in the MD/HD EV program. SDG&E’s response states, in part, “Relatively mature vehicle classes such as delivery trucks and transit buses were weighted more heavily because it was assumed that those vehicles would be adopted sooner.” Please state SDG&E’s assessment of the maturity of electric vehicles in the following vehicle categories, and state the basis of SDG&E’s conclusions:

a. School buses

b. Refuse trucks

c. Forklifts

d. Airport ground support equipment

e. Drayage trucks

f. Class 2 vehicles

g. Class 3 vehicles

h. Class 4 vehicles

i. Class 5 vehicles

j. Class 6 vehicles

k. Class 7 vehicles

l. Class 8 vehicles

**SDG&E Response:**

SDG&E did not examine each of the above categories separately. SDG&E took a holistic look at which electric vehicles were generally in the market during the time of filing. The current state of the market during application filing and announcements of future vehicle offerings helped determine which vehicles may proliferate over the coming years.

It is important to note that the MD/HD program is designed to be flexible. EVSE deployment will be customer driven within the vehicle classes. The estimated EVSE counts within vehicle categories was used to construct an estimated budget.

1. SDG&E’s response to Question 9 in EYCEJ/CCAEJ-SDG&E-DR-01 states: “3,100 vehicles amount to approximately 3% of the MD and HD vehicle population in SDG&E’s service territory. Adoption curves show that the first 2.5% of technology adopters are ‘innovators.’ They are followed by the next 13.5%, known as ‘early adopters.’ SDG&E’s program size of 3% helps move the San Diego region market out of the innovators group into the early adopters group.”

a. Please define “innovators” as used in this context.

b. Please define “early adopters” as used in this context.

c. Why didn’t SDG&E propose an MD/HD EV program that would be sufficient to cover all “early adopters”?

d. How does SDG&E intend to support charging infrastructure for all “early adopters”?

**SDG&E Response:**

a. There are various definitions of “innovators” in this context but innovators are generally seen as the first to adopt a new product or service. They are generally more interested in new technologies and willing to take on more risk than later adopters.

b. There are various definitions of “early adopters” in this context but early adopters are generally those who adopt a new technology early, after innovators. They are seen as opinion leaders who have a high degree of leadership or influencing power.

c. In order to cover innovators and all early adopters the program would have covered approximately 16% of the market. SDG&E thought it prudent to propose a smaller program.

d. SDG&E will evaluate the need for additional programs to support additional early adopters at a later time after deployment of the currently pending MD/HD program.

1. In response to Question 7 in NDC-SDG&E-DR-01, SDG&E provided a table labeled “IHS/Polk Data – Derived from Source Data.”

a. What is the source data?

b. How were the figures in the chart derived from that source data?

**SDG&E Response:**

IHS/Polk Data is the source data. The raw data includes information such as vehicle class. A pivot chart was created to show the number of vehicles per vehicle weight class.

1. How many forklifts does SDG&E estimate are in its territory? How many TRUs does SDG&E estimate are in its territory? Please state the basis for your estimates.

**SDG&E Response:**

The IHS/Polk Data shows the number of on-road vehicles. It does not include off-road vehicles such as forklifts and TRUs. SDG&E does not have an estimate of the number of forklifts and TRUs in SDG&E’s service territory.

1. In response to Question 2(b) in NDC-SDG&E-DR-02, SDG&E states “SDG&E will weigh each customer’s request on several factors including number of vehicles procured, location and cost of site, and if the procurement of a vehicle or vehicles could lead to greater EV adoption in the future.”

a. In what context and for what purpose will SDG&E “weigh each customer’s request”?

b. Please identify each factor SDG&E intends to use in weighing each customer’s request, and the weight of those factors.

c. Does SDG&E intend to screen customers’ eligibility for participation in the MD/HD EV program by weighing “each customer’s request on several factors”?

d. Does SDG&E intend to establish a competitive process for its customers to apply to participate in the MD/HD EV program? Or will all eligible customers be able to participate on a first-come, first-served basis as long as funds remain in the program budget?

e. Under SDG&E’s proposal, would the Company have discretion to deny participation to a customer if the Company believed that the customer’s EV procurement would not “lead to greater EV adoption in the future”?

f. How does SDG&E intend to assess whether a customer’s procurement could lead to greater EV adoption in the future?

**SDG&E Response:**

a. Each request will be examined to evaluate if the customer meets the eligibility requirements of the MD/HD EV Infrastructure Program such as a commitment to procure EVs and suitable site location.

b. SDG&E may consider factors such as number of vehicles procured, location and cost of site.

c. SDG&E may not formally weigh factors.

d. Customers will be approved on a first-come basis as long as they meet eligibility requirements.

e. A customer would not be denied simply because they may or may not procure additional EVs in the future beyond the initial deployment. A smaller deployment may be reasonable if the customer is likely to procure and operate additional EVs if the initial deployment is successful.

f. SDG&E will examine this on a case by case basis. Assessment will include the overall size of the fleet, public commitments to greater electrification or other indications and conditions which could allow for greater future deployment.