

In the Matter of the Application of San Diego Gas & Electric Company (U 902 E) for Approval of its Proposals for Dynamic Pricing and Recovery of Incremental Expenditures Required for Implementation.

Application 10-07-009
(Filed July 6, 2010)

Application of San Diego Gas & Electric Company (U 902 E) for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design.

Application 19-03-002
(Filed March 4, 2019)

Application: 10-07-009/A.19-03-002
Exhibit No.: _____

**PREPARED SUPPLEMENTAL TESTIMONY
OF
JENNIFER REYNOLDS**

ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



AUGUST 30, 2019

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**PREPARED SUPPLEMENTAL TESTIMONY OF
JENNIFER REYNOLDS**

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I. INTRODUCTION AND PURPOSE

The purpose of my prepared supplemental testimony is to provide the information the Administrative Law Judge (“ALJ”) requested in Section 4 (“Petition to Modify Decision 12-12-004”) of the July 26, 2019 Ruling Directing San Diego Gas & Electric Company [“SDG&E”] to File/Serve Supplemental Information (“July 26, 2019 Ruling”). The July 26, 2019 Ruling (at p. 3) requires SDG&E to serve supplemental testimony that includes information responsive to a set of seven questions identified in Section III below. This testimony responds to questions 1-5, while a separate witness, Horace Tantom, is responding to questions 6 and 7. On August 2, 2019, SDG&E requested an extension of time (from August 12, 2019 to August 30, 2019) to serve this supplemental testimony, which was granted by the ALJ via e-mail ruling on August 6, 2019.

II. BACKGROUND

On April 26, 2019, SDG&E filed a petition for modification (“PFM”) of Decision (“D.”) 12-12-004,¹ asking the CPUC to change the rate that new small nonresidential customers turn onto when they sign up for service with SDG&E. Currently, small nonresidential customers turning on service are placed on a time-of-use (“TOU”) rate with a critical peak pricing (“CPP”) component, which requires the customer to reduce their electricity use during “event days.”² SDG&E has found that existing customers who do not or cannot reduce their usage on event days may experience bill volatility during the hot summer months. The PFM sought to place new small non-residential customers onto a TOU-only rate (without a CPP component), to reduce summer bill volatility. Once

¹ Application (“A.”) 10-07-009, Petition for Modification of Decision No. 12-12-004 of San Diego Gas & Electric Company (April 26, 2019) (“SDG&E PFM of D.12-12-004”).

² SDG&E calls “event days” to send a price signal to customers to reduce their usage during the critical peak period between 2 pm and 6 pm (an “event period”), on extreme high load days. Event days have typically occurred on days when outside temperatures are expected to be very high. See SDG&E PFM of D.12-12-004 at Appendix C, C-2.

1 on the TOU-only rate, the new customer could then select the TOU rate with the CPP component if
2 they believed they could respond when event days are called.

3 On June 24, 2019, the proceeding in which the PFM was filed, A.10-07-009, was
4 consolidated with the SDG&E General Rate Case Phase 2 proceeding, A.19-03-002 (“GRC Phase
5 2”).³

6 **III. QUESTIONS AND RESPONSES**

7 **1. Identify and describe which, or which types of, small non-residential customers** 8 **are structural beneficiaries, and which are structural non-benefiters under the** 9 **current default time of use (TOU) with Critical Peak Pricing (CPP) rate.**

10 Structural beneficiaries can have a variety of usage characteristics and are generally those
11 customers that have business operating hours falling outside of the hours of 2 pm – 6 pm, during the
12 hottest days of the year, and/or are less dependent on air conditioning (“AC”). These customers
13 would be less impacted by the event day rates. Rather than increasing usage on the hottest days of
14 the years due to AC usage, businesses without AC may instead turn off lights, to lessen the impact of
15 not having AC. Simply put, structural beneficiaries naturally use less energy during event period hours
16 of 2 pm – 6 pm, without behavior modification or load curtailment efforts.

17 Structural non-benefiters are those customers that have business operating hours and higher
18 usage during the hours of 2 pm – 6 pm, on the hottest days of the year. These customers would be
19 impacted by the event day rates more than a typical business with 8 am - 5 pm operating hours.
20 Structural non-benefiters could be customers with AC that are required to provide a consistently cool
21 temperature at their business. That is, they have no operational latitude to reduce AC during the
22 period 2 pm – 6 pm on the hottest days of the year. Rather than decreasing usage during an event
23 period, these customers would typically increase usage on the hottest days of the year, from 2 pm – 6

³ Administrative Law Judge’s Ruling Consolidating Proceedings, and Confirming Preliminary Categorization and Assignment of Consolidated Proceeding (dated June 24, 2019). This Ruling consolidated A.19-03-002 and A.10-07-009.

1 pm. They would use more energy during event periods, compared with a typical business that is less
 2 dependent on AC or that operates with AC for only a portion of the 2 pm – 6 pm event periods.

3 To respond to this question, SDG&E developed average monthly bill impact results based on
 4 a randomly selected sample of 1,000 small non-residential accounts based on the approximately
 5 130,000 accounts eligible for Small Commercial rate options. Due to limitations with the systems
 6 SDG&E uses to estimate monthly bill impacts, if all 130,000 small non-residential accounts were
 7 run under the same analysis procedure, the average bill impacts and frequency distributions would
 8 be similar. Average monthly bill impacts by North American Industry Classification System
 9 (“NAICS”) business codes for SDG&E’s Small Commercial customers are shown in Table JR-1
 10 below.

Table JR-1
Sample of Monthly Bill Impacts by NAICS Business Type
Showing Sample Distribution, Average Monthly Bill Under Event-Based Rate, and Average Impact of Switching to Non-Event-Based Rate

Line #	NAICS Business Type (A)	Sample Count (B)	Percentage of Sample (C)	Average Monthly Bill under Event-Based Rate (\$ per Month) (D)	Average Monthly Bill Change Opting to Non-Event Rate (\$ per Month) (E)	(% per Month) (F)	Line #
1	Biotech/Laboratory/Research	10	1.0%	\$460.20	(\$6.41)	-1.4%	1
2	Cable/Utilities	1	0.1%	\$128.53	\$0.87	0.7%	2
3	Colleges/Universities	3	0.3%	\$108.34	(\$1.41)	-1.3%	3
4	Communications	55	5.5%	\$557.92	\$6.55	1.2%	4
5	Electronics/Telecommunications	6	0.6%	\$698.26	(\$1.48)	-0.2%	5
6	General Manufacturing	26	2.6%	\$386.09	\$0.48	0.1%	6
7	Government	18	1.8%	\$359.99	\$3.84	1.1%	7
8	Groceries	18	1.8%	\$683.63	\$1.26	0.2%	8
9	Growers	15	1.5%	\$205.29	(\$1.06)	-0.5%	9
10	Healthcare	66	6.6%	\$331.50	(\$3.97)	-1.2%	10
11	Large Manufacturing	7	0.7%	\$584.59	\$1.86	0.3%	11
12	Lodging	6	0.6%	\$338.00	\$1.61	0.5%	12
13	Military	3	0.3%	\$171.10	\$1.04	0.6%	13
14	Miscellaneous Services	244	24.4%	\$258.96	(\$2.16)	-0.8%	14
15	NA	12	1.2%	\$120.74	(\$1.41)	-1.2%	15
16	Non-food Retail	99	9.9%	\$326.62	(\$2.31)	-0.7%	16
17	Property Management/Offices	197	19.7%	\$298.26	\$0.95	0.3%	17
18	Rail/Transit/Air	14	1.4%	\$316.72	(\$0.06)	0.0%	18
19	Recreation/Entertainment	25	2.5%	\$325.32	(\$2.18)	-0.7%	19
20	Residential	18	1.8%	\$152.01	\$0.76	0.5%	20
21	Restaurants	65	6.5%	\$720.34	\$2.56	0.4%	21
22	Sand & Gravel/Contractors	25	2.5%	\$222.53	(\$2.72)	-1.2%	22
23	Schools/Libraries	14	1.4%	\$179.16	(\$2.70)	-1.5%	23
24	Water/Sewage	21	2.1%	\$198.55	\$0.10	0.1%	24
25	Wholesale/Warehousing	32	3.2%	\$246.65	(\$2.10)	-0.9%	25
26	Total Sample	1,000	100.0%	\$338.33	(\$0.50)	-0.1%	26

11
 12 The average monthly bill estimates in Table JR-1 for customers on event-based rates assume
 13 nine events per year and 12 months of historic usage for each account. Under these assumptions, the

1 analysis shows that the total of annual bills under an event-based rate⁴ is very close to revenue-
2 neutral (by design),⁵ compared to total bills under non-event-based rates.⁶ This analysis uses actual
3 customer usage during the nine designated event periods, and therefore does adjust for how each
4 customer may shift usage or reduce usage during the event periods of 2 pm to 6 pm.

5 **2. Provide bill impact information for structural beneficiaries and structural non-**
6 **benefiters. At minimum, include:**

- 7 **a. Average monthly bills in each climatic zone, under the default TOU/CPP**
8 **rate since November 2015. Provide this information separately for**
9 **CARE customers and for all other small non-residential customers.**
- 10 **b. Average monthly bills, in each climatic zone, under otherwise applicable**
11 **tariffs for the same time period as Item 2.a. Provide this information**
12 **separately for CARE customers and for all other small non-residential**
13 **customers.**

14 All customers would be impacted, to some degree, by rate differences between event-based
15 rates (*e.g.* Schedule TOU-A, with Commodity rates under Schedule EECC TOU-A-P) and non-
16 event-based rates (*e.g.*, Schedule TOU-A, with Commodity rates under Schedule EECC). Since
17 there are approximately 130,000 non-residential accounts that qualify for Small Commercial rate
18 options, SDG&E needed to make some simplifying assumptions to provide this analysis. SDG&E
19 also does not have a means of producing associated historic bill amounts, and corresponding shadow
20 bills, under the periodically changing electric rates and rate structures since November 2015.

21 To evaluate the magnitude of the annual bill differences, SDG&E performed bill analyses for
22 the same sample of 1,000 randomly selected active Small Commercial accounts. Bill analysis was

4 Schedule EECC-TOU-A-P.

5 Because SDG&E's TOU/CPP commodity rates are designed to be revenue-neutral, using the average small non-residential customer class load shape, approximately half of the customers will benefit from TOU/CPP rates on an annual basis, and approximately half will be subject to an annual bill increase. SDG&E PFM of D.12-12-004 at Appendix A, A-7. Table JR-1 of SDG&E PFM of D.12-12-004 illustrates the expected summer bill volatility for non-participation on a CPP rate, which leads to a monthly bill increase of 47%.

6 Schedule EECC.

1 performed for event-based⁷ and non-event based currently effective rates.⁸ A summary of the results
 2 is shown in Table JR-2.

Table JR-2
Summary of Average Monthly Impacts for Sample of Small Non-Residential Customers
Average Monthly Bill Impact When Switched from Event-Based Rate to Non-Event-Based Rate

Line #	Average Monthly Bill Impact (A)	Customer Count (B)	Percentage of Accounts (C)	Line #
1	Less than (\$40)	1	0.1%	1
2	(\$40) to (\$30)	1	0.1%	2
3	(\$30) to (\$20)	7	0.7%	3
4	(\$20) to (\$10)	76	7.6%	4
5	(\$10) to \$0	373	37.3%	5
6	\$0 to \$10	478	47.8%	6
7	\$10 to \$20	53	5.3%	7
8	\$20 to \$30	9	0.9%	8
9	\$30 to \$40	2	0.2%	9
10				10
11	Sample Total	1,000	100%	11
12				12
13				13
14			Average Monthly Bill Change (\$0.50)	14
15			Max Monthly Bill Increase \$36.86	15
16			Max Monthly Bill Decrease (\$142.11)	16

3
 4 Climate zones do not impact non-residential customers in the same ways as residential
 5 customers, through seasonal adjustments to baseline allowances. For this reason, SDG&E does not
 6 typically present non-residential bill analysis by climate zones. For purposes of responding to this
 7 question, SDG&E has identified the climate zone for each of the selected accounts in the random
 8 sample of 1,000 non-residential accounts used in this analysis. Based on this sample size, SDG&E
 9 presents the results of this analysis in Table JR-3.

Table JR-3
Impacts by Climate Zone for Sample of Small Non-Residential Customers
Average Monthly Bill Impact When Switched from Event-Based Rate to Non-Event-Based Rate

Line #	Climate Zone (A)	Sample Count (B)	Average Monthly Bill Under Event-Based Rate (\$ per Month) (C)	Average Monthly Bill Difference When Opting to Non-Event-Based Rate (\$ per Month) (D)	(%) (E)	Line #
1	Coastal	572	\$335.34	0.06	0.0%	1
2	Inland	412	\$345.90	(\$1.20)	-0.3%	2
3	Mountain	16	\$250.30	(\$2.23)	-0.9%	3
4	Desert	-	NA	NA	NA	4
5	Total Sample	1,000	\$338.33	(\$0.50)	-0.1%	5

10

⁷ Schedule TOU-A (with EECC TOU-A-P).

⁸ Schedule TOU-A.

1 A small percentage of SDG&E’s non-residential customers qualify for low-income
 2 California Alternate Rates for Energy (“CARE”) rates under Schedule Expanded-CARE (“E-
 3 CARE”).⁹ E-CARE customers include eligible non-profit group living facilities and agricultural
 4 employee housing facility customers, as defined in Schedule E-CARE. Enrolled E-CARE customers
 5 receive a 20% line-item bill discount if such facilities qualify to receive service under the terms and
 6 conditions of Schedule E-CARE. Monthly bill impact estimates for this group of accounts, under
 7 event-based and non-event-based rates, are shown in Table JR-4. Table JR-4 below shows that E-
 8 CARE customers on an event-based rate, again assuming 9 event days per year, will pay more on
 9 their bill compared to a non-event-based rate. This conclusion may be indicative of AC needs
 10 during event periods. Table JR-5 below shows the number of E-CARE customers by climate zone
 11 and estimated average monthly bill impacts when switched from an event-based rate to a non-event-
 12 based rate.

Table JR-4
Summary of Average Monthly Impacts - Expanded CARE Customers
Average Monthly Bill Impact When Switched from Event-Based Rate to Non-Event-Based Rate

Line #	Average Monthly Bill Impact Range		Count (B)	Percentage of Sample (C)	Line #
	(\$ per Month) (A)				
1	(\$160) to	(\$170)	2	1.6%	1
2	(\$150) to	(\$160)	-	0.0%	2
3	(\$140) to	(\$150)	-	0.0%	3
4	(\$130) to	(\$140)	-	0.0%	4
5	(\$120) to	(\$130)	-	0.0%	5
6	(\$110) to	(\$120)	2	1.6%	6
7	(\$100) to	(\$110)	1	0.8%	7
8	(\$90) to	(\$100)	5	3.9%	8
9	(\$80) to	(\$90)	2	1.6%	9
10	(\$70) to	(\$80)	3	2.3%	10
11	(\$60) to	(\$70)	9	7.0%	11
12	(\$50) to	(\$60)	10	7.8%	12
13	(\$40) to	(\$50)	4	3.1%	13
14	(\$30) to	(\$40)	10	7.8%	14
15	(\$20) to	(\$30)	16	12.4%	15
16	(\$10) to	(\$20)	22	17.1%	16
17	\$0 to	(\$10)	43	33.3%	17
18	Total		129	100.0%	18

13

⁹ 129 customers qualify for E-CARE, out of the 130,000 small non-residential customer accounts.

Table JR-5
Impact Estimates for Expanded CARE Customers, by Climate Zone
Average Monthly Bill Impact When Switched from Event-Based Rate to Non-Event-Based Rate

Line #	Climate Zone	Customer Count	Average Monthly Bill Under Event-Based Rate	Average Monthly Bill Difference Opting to Non-Event Rate	(%)	Line #
	(A)	(B)	(\$ per Month) (C)	(\$ per Month) (D)	(E)	
1	Coastal	85	\$158.26	(\$25.21)	-15.9%	1
2	Inland	42	\$262.14	(\$46.57)	-17.8%	2
3	Mountain	2	\$77.28	(\$10.06)	-13.0%	3
4	Desert	0	NA	NA	NA	4
5	Total	129	\$190.83	(\$31.93)	-16.7%	5

3. **Provide the number of complaints from small non- residential customers that are in any way associated with a “high bill” or a “higher than expected” bill, by month and climatic zone, since July 2014. Provide this information separately for CARE customers and for all other small non-residential customers.**

Table JR-6
Number of Non-Residential High Bill Complaints and High Bill Calls
Compiled in July, August and September of Each Year

Line #		2014			2015			2016			2017			2018			Line #
		July	Aug	Sep	July	Aug	Sep	July	Aug	Sep	July	Aug	Sep	July	Aug	Sep	
1																	1
2	# of High Bill Complaints*	5	1	10	7	12	2	9	12	8	9	14	5	5	9	3	2
3	# of High Bill Calls**	DATA NOT AVAILABLE			DATA NOT AVAILABLE			56	97	62	86	93	338	355	616	280	3

Notes:

*includes escalated customer contact records in Customer Resolution Tracking System (CRTS)

**includes customer contact notes (CCONs) created by CCC

4. **Provide the number of complaints from small non- residential customers, by month and climatic zone, since November 2015. Provide this information separately for CARE customers and for all other small non-residential customers.**

Complaints from small non-residential customers, by month since November 2015, are shown in Tables JR-7 and JR-8 below. Table JR-7 reflects complaints from all small non-residential customers, by climate zone. Table JR-8 reflects complaints from E-CARE customers only, by climate zone.¹⁰

¹⁰ July, August, and September are the only months illustrated, because this is when high bill complaints are most common.

Table JR-7									
High Bill Calls - All Non-Residential									
Climate Zone	2016			2017			2018		
	July	August	September	July	August	September	July	August	September
Coastal	27	44	41	45	52	206	197	358	151
Inland	24	49	16	37	38	131	156	245	125
Mountain	4	4	5	4	2	0	2	12	4
Desert	1	0	0	0	1	1	0	1	0
Total	56	97	62	86	93	338	355	616	280
High Bill Calls - CARE									
Climate Zone	2016			2017			2018		
	July	August	September	July	August	September	July	August	September
Coastal	0	0	0	0	0	0	1	0	0
Inland	0	1	0	0	0	1	3	0	1
Mountain	0	0	0	1	1	0	0	0	0
Desert	0	0	0	0	0	0	0	0	0
Total	0	1	0	1	1	1	4	0	1
High Bill Calls - Non-CARE									
Climate Zone	2016			2017			2018		
	July	August	September	July	August	September	July	August	September
Coastal	27	44	41	45	52	206	196	358	151
Inland	24	48	16	37	38	130	153	245	124
Mountain	4	4	5	3	1	0	2	12	4
Desert	1	0	0	0	1	1	0	1	0
Total	56	96	62	85	92	337	351	616	279
Note: 2014 and 2015 high bill call data not available									

1

Table JR-8															
High Bill Complaints - All Non-Residential															
Climate Zone	2014			2015			2016			2017			2018		
	July	August	September	July	August	September	July	August	September	July	August	September	July	August	September
Coastal	4	0	4	5	6	2	5	7	4	5	9	1	2	6	1
Inland	1	1	6	2	6	0	3	5	4	3	5	4	3	3	2
Mountain	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Desert	0	0	0	0	0	0	1	0	0	1	0	0	0	0	0
Total	5	1	10	7	12	2	9	12	8	9	14	5	5	9	3
High Bill Complaints - CARE															
Climate Zone	2014			2015			2016			2017			2018		
	July	August	September	July	August	September	July	August	September	July	August	September	July	August	September
Coastal	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0
Inland	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mountain	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Desert	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0
High Bill Complaints - Non-CARE															
Climate Zone	2014			2015			2016			2017			2018		
	July	August	September	July	August	September	July	August	September	July	August	September	July	August	September
Coastal	4	0	4	5	6	2	5	7	4	4	9	1	2	6	1
Inland	1	1	6	2	6	0	3	5	4	3	5	4	3	3	2
Mountain	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Desert	0	0	0	0	0	0	1	0	0	1	0	0	0	0	0
Total	5	1	10	7	12	2	9	12	8	8	14	5	5	9	3

2

1 **5. Provide the number of customers that have opted out of the default TOU/CPP**
2 **rate, by month and climatic zone, since November 2015. Provide this**
3 **information separately for CARE customers and for all other small non-**
4 **residential customers.**

5 SDG&E has identified the number of small non-residential accounts on event-based
6 (TOU/CPP) rates versus those accounts that have opted-out of non-event-based rates. The values
7 presented below are based on numbers of small non-residential TOU accounts on the default event-
8 based rates versus the optional non-event-based rates. The results shown do not represent specific
9 customer decisions of why to opt-out, but instead identify the billing options applied for small non-
10 residential TOU accounts, month by month.

11 In 2015, most accounts were on the now-cancelled Schedule A, which was SDG&E's small
12 non-residential, non-TOU rate, and therefore was not included in the 2015 numbers. Identification
13 of monthly rate option data by climate zone and by non-residential CARE customers is unavailable.
14 An annual summary of small non-residential accounts by rate option is shown in Table JR- 9 below.
15 Monthly results, by rate option, are shown in Tables JR-10 through JR-14 below.

Line #	Rate (A)	Commodity Option (B)	Active Service Points in Each Year					Notes: (H)	Line #
			2015* (C)	2016 (D)	2017 (E)	2018 (F)	2019 (G)		
1	Schedule TOU-A	Non-Event Based	3,147	10,404	9,382	10,650	10,600	Schedule EECC	1
2		Event Based	18,934	122,757	123,128	124,193	119,627	Schedule EECC-TOU-A-P	2
3		Sub-Total	22,081	133,161	132,510	134,843	130,227	Line 1 + Line 2	3
4									4
5	Schedule TOU-A2	Non-Event Based	-	-	-	309	578	Schedule EECC	5
6		Event Based	-	-	-	627	1,029	Schedule EECC-TOU-A2-P	6
7		Sub-Total	-	-	-	936	1,607	Line 5 + Line 6	7
8									8
9	Schedule TOU-A3	Non-Event Based	-	-	-	96	166	Schedule EECC	9
10		Event Based	-	-	-	346	449	Schedule EECC-TOU-A3-P	10
11		Sub-Total	-	-	-	442	615	Line 9 + Line 10	11
12									12
13	Annual Totals	Non-Event Based	4,075	11,283	9,677	11,528	12,171	Sum of Lines 1, 5, 9	13
14		Event Based	18,937	122,845	123,211	127,075	123,361	Sum of Lines 2, 6, 10	14
15		Total	23,012	134,128	132,888	138,603	135,532	Line 13 + Line 14	15
16		Op-Out %	17.7%	8.4%	7.3%	8.3%	9.0%	Line 13 / Line 15	16

* 2015 totals appear low since many accounts were on a now-cancelled rate, Schedule A.

Table JR-10
Small Commercial Accounts on Event-Based and Non-Event Based Rates
Calendar Year 2015

Line #	Rate (A)	Commodity Option (B)	Active Service Points in Each Month												Notes: (O)	Line #
			Jan-15 (C)	Feb-15 (D)	Mar-15 (E)	Apr-15 (F)	May-15 (G)	Jun-15 (H)	Jul-15 (I)	Aug-15 (J)	Sep-15 (K)	Oct-15 (L)	Nov-15 (M)	Dec-15 (N)		
1	Schedule TOU-A	Non-Event Based	1,393	1,414	1,438	1,459	1,461	1,512	1,545	1,548	1,596	1,666	1,926	3,053	Schedule EECC Schedule EECC-CPP-D Line 1 + Line 2	1
2		Event Based	1,737	1,751	1,799	1,824	1,831	1,843	1,877	1,888	1,925	2,077	3,900	18,852		2
3		Sub-Total	3,130	3,165	3,237	3,283	3,292	3,355	3,422	3,436	3,521	3,743	5,826	21,905		3
4															4	
5	Schedule TOU-A2	Non-Event Based	-	-	-	-	-	-	-	-	-	-	-	-	Schedule EECC Schedule EECC-TOU-A2-P Line 5 + Line 6	5
6		Event Based	-	-	-	-	-	-	-	-	-	-	-	-		6
7		Sub-Total	-	-	-	-	-	-	-	-	-	-	-	-		7
8															8	
9	Schedule TOU-A3	Non-Event Based	-	-	-	-	-	-	-	-	-	-	-	-	Schedule EECC Schedule EECC-TOU-A3-P Line 9 + Line 10	9
10		Event Based	-	-	-	-	-	-	-	-	-	-	-	-		10
11		Sub-Total	-	-	-	-	-	-	-	-	-	-	-	-		11
12															12	
13	Monthly Totals	Non-Event Based	1,393	1,414	1,438	1,459	1,461	1,512	1,545	1,548	1,596	1,666	1,926	3,053	Sum of Lines 1, 5, 9 Sum of Lines 2, 6, 10 Line 13 + Line 14 Line 13 / Line 15	13
14		Event Based	1,737	1,751	1,799	1,824	1,831	1,843	1,877	1,888	1,925	2,077	3,900	18,852		14
15		Total	3,130	3,165	3,237	3,283	3,292	3,355	3,422	3,436	3,521	3,743	5,826	21,905		15
16	Op-Out %	44.5%	44.7%	44.4%	44.4%	44.4%	45.1%	45.1%	45.1%	45.3%	44.5%	33.1%	13.9%		16	

* 2015 totals appear low since many accounts were on a now-canceled rate, Schedule A.

Table JR-11
Small Commercial Accounts on Event-Based and Non-Event Based Rates
Calendar Year 2016

Line #	Rate (A)	Commodity Option (B)	Active Service Points in Each Month												Notes: (O)	Line #
			Jan-16 (C)	Feb-16 (D)	Mar-16 (E)	Apr-16 (F)	May-16 (G)	Jun-16 (H)	Jul-16 (I)	Aug-16 (J)	Sep-16 (K)	Oct-16 (L)	Nov-16 (M)	Dec-16 (N)		
1	Schedule TOU-A	Non-Event Based	4,326	4,930	6,203	8,340	8,013	8,147	8,284	8,426	8,459	8,527	8,654	8,728	Schedule EECC Schedule EECC-CPP-D Line 1 + Line 2	1
2		Event Based	42,850	48,224	86,514	117,756	118,886	118,588	118,609	118,806	118,929	119,059	118,957	118,880		2
3		Sub-Total	47,176	53,154	92,717	126,096	126,899	126,735	126,893	127,232	127,388	127,586	127,611	127,608		3
4															4	
5	Schedule TOU-A2	Non-Event Based	-	-	-	-	-	-	-	-	-	-	-	-	Schedule EECC Schedule EECC-TOU-A2-P Line 5 + Line 6	5
6		Event Based	-	-	-	-	-	-	-	-	-	-	-	-		6
7		Sub-Total	-	-	-	-	-	-	-	-	-	-	-	-		7
8															8	
9	Schedule TOU-A3	Non-Event Based	-	-	-	-	-	-	-	-	-	-	-	-	Schedule EECC Schedule EECC-TOU-A3-P Line 9 + Line 10	9
10		Event Based	-	-	-	-	-	-	-	-	-	-	-	-		10
11		Sub-Total	-	-	-	-	-	-	-	-	-	-	-	-		11
12															12	
13	Monthly Totals	Non-Event Based	4,326	4,930	6,203	8,340	8,013	8,147	8,284	8,426	8,459	8,527	8,654	8,728	Sum of Lines 1, 5, 9 Sum of Lines 2, 6, 10 Line 13 + Line 14 Line 13 / Line 15	13
14		Event Based	42,850	48,224	86,514	117,756	118,886	118,588	118,609	118,806	118,929	119,059	118,957	118,880		14
15		Total	47,176	53,154	92,717	126,096	126,899	126,735	126,893	127,232	127,388	127,586	127,611	127,608		15
16	Op-Out %	9.2%	9.3%	6.7%	6.6%	6.3%	6.4%	6.5%	6.6%	6.6%	6.7%	6.8%	6.8%		16	

* Totals for Q1 of 2016 appear low since many accounts were on a now-canceled rate, Schedule A.

Table JR-12
Small Commercial Accounts on Event-Based and Non-Event Based Rates
Calendar Year 2017

Line #	Rate (A)	Commodity Option (B)	Active Service Points in Each Month												Notes: (O)	Line #
			Jan-17 (C)	Feb-17 (D)	Mar-17 (E)	Apr-17 (F)	May-17 (G)	Jun-17 (H)	Jul-17 (I)	Aug-17 (J)	Sep-17 (K)	Oct-17 (L)	Nov-17 (M)	Dec-17 (N)		
1	Schedule TOU-A	Non-Event Based	8,746	8,747	8,742	8,739	8,692	8,681	8,665	8,668	8,703	8,777	8,775	8,652	Schedule EECC Schedule EECC-CPP-D Line 1 + Line 2	1
2		Event Based	119,049	119,191	119,425	119,627	119,844	120,067	120,325	120,788	120,959	121,156	121,341	120,410		2
3		Sub-Total	127,795	127,938	128,167	128,366	128,536	128,748	128,990	129,456	129,662	129,933	130,116	129,062		3
4															4	
5	Schedule TOU-A2	Non-Event Based	-	-	-	-	-	-	-	-	-	-	-	-	Schedule EECC Schedule EECC-TOU-A2-P Line 5 + Line 6	5
6		Event Based	-	-	-	-	-	-	-	-	-	-	-	-		6
7		Sub-Total	-	-	-	-	-	-	-	-	-	-	-	-		7
8															8	
9	Schedule TOU-A3	Non-Event Based	-	-	-	-	-	-	-	-	-	-	-	-	Schedule EECC Schedule EECC-TOU-A3-P Line 9 + Line 10	9
10		Event Based	-	-	-	-	-	-	-	-	-	-	-	-		10
11		Sub-Total	-	-	-	-	-	-	-	-	-	-	-	-		11
12															12	
13	Monthly Totals	Non-Event Based	8,746	8,747	8,742	8,739	8,692	8,681	8,665	8,668	8,703	8,777	8,775	8,652	Sum of Lines 1, 5, 9 Sum of Lines 2, 6, 10 Line 13 + Line 14 Line 13 / Line 15	13
14		Event Based	119,049	119,191	119,425	119,627	119,844	120,067	120,325	120,788	120,959	121,156	121,341	120,410		14
15		Total	127,795	127,938	128,167	128,366	128,536	128,748	128,990	129,456	129,662	129,933	130,116	129,062		15
16	Op-Out %	6.8%	6.8%	6.8%	6.8%	6.8%	6.7%	6.7%	6.7%	6.7%	6.8%	6.7%	6.7%		16	

Table JR-13
Small Commercial Accounts on Event-Based and Non-Event Based Rates
Calendar Year 2018

Line #	Rate (A)	Commodity Option (B)	Active Service Points in Each Month												Notes: (O)	Line #
			Jan-18 (C)	Feb-18 (D)	Mar-18 (E)	Apr-18 (F)	May-18 (G)	Jun-18 (H)	Jul-18 (I)	Aug-18 (J)	Sep-18 (K)	Oct-18 (L)	Nov-18 (M)	Dec-18 (N)		
1	Schedule TOU-A	Non-Event Based	8,676	8,826	8,907	8,897	8,916	9,910	10,016	9,939	9,943	9,963	9,959	9,930	Schedule EICC	1
2		Event Based	120,573	120,639	120,647	120,744	120,960	121,055	120,323	118,334	117,989	117,922	117,913	117,692	Schedule EICC-CPP-D	2
3		Sub-Total	129,249	129,465	129,554	129,641	129,876	130,965	130,339	128,273	127,932	127,885	127,872	127,622	Line 1 + Line 2	3
4																4
5	Schedule TOU-A2	Non-Event Based	-	-	-	-	-	-	79	173	206	249	265	304	Schedule EICC	5
6		Event Based	-	-	-	-	-	-	138	325	448	534	598	619	Schedule EICC-TOU-A2-P	6
7		Sub-Total	-	-	-	-	-	-	217	498	654	783	863	923	Line 5 + Line 6	7
8																8
9	Schedule TOU-A3	Non-Event Based	-	-	-	-	-	-	50	75	79	86	93	95	Schedule EICC	9
10		Event Based	-	-	-	-	-	-	207	264	284	298	334	345	Schedule EICC-TOU-A3-P	10
11		Sub-Total	-	-	-	-	-	-	257	339	363	384	427	440	Line 9 + Line 10	11
12																12
13	Monthly Totals	Non-Event Based	8,676	8,826	8,907	8,897	8,916	9,910	10,145	10,187	10,228	10,298	10,317	10,329	Sum of Lines 1, 5, 9	13
14		Event Based	120,573	120,639	120,647	120,744	120,960	121,055	120,668	118,923	118,721	118,754	118,845	118,656	Sum of Lines 2, 6, 10	14
15		Total	129,249	129,465	129,554	129,641	129,876	130,965	130,813	129,110	128,949	129,052	129,162	128,985	Line 13 + Line 14	15
16		Op-Out %	6.7%	6.8%	6.9%	6.9%	6.9%	7.6%	7.8%	7.9%	7.9%	8.0%	8.0%	8.0%	Line 13 / Line 15	16

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Table JR-14
Small Commercial Accounts on Event-Based and Non-Event Based Rates
Calendar Year 2019 YTD

Line #	Rate (A)	Commodity Option (B)	Active Service Points in Each Month						Notes: (I)	Line #
			Jan-19 (C)	Feb-19 (D)	Mar-19 (E)	Apr-19 (F)	May-19 (G)	Jun-19 (H)		
1	Schedule TOU-A	Non-Event Based	9,950	9,930	9,996	10,092	10,147	10,221	Schedule EICC	1
2		Event Based	117,778	117,843	117,946	117,871	117,823	117,677	Schedule EICC-TOU-A-P	2
3		Sub-Total	127,728	127,773	127,942	127,963	127,970	127,898	Line 5 + Line 6	3
4										4
5	Schedule TOU-A2	Non-Event Based	398	423	449	482	501	542	Schedule EICC	5
6		Event Based	688	759	792	837	914	961	Schedule EICC-TOU-A2-P	6
7		Sub-Total	1,086	1,182	1,241	1,319	1,415	1,503	Line 9 + Line 10	7
8										8
9	Schedule TOU-A3	Non-Event Based	94	98	101	125	141	157	Schedule EICC	9
10		Event Based	374	385	415	423	428	430	Schedule EICC-TOU-A3-P	10
11		Sub-Total	468	483	516	548	569	587	Line 13 + Line 14	11
12										12
13	Monthly Totals	Non-Event Based	10,442	10,451	10,546	10,699	10,789	10,920	Sum of Lines 1, 5, 9,	13
14		Event Based	118,840	118,987	119,153	119,131	119,165	119,068	Sum of Lines 2, 6, 10	14
15		Total	129,282	129,438	129,699	129,830	129,954	129,988	Line 13 + Line 14	15
16		Op-Out %	8.1%	8.1%	8.1%	8.2%	8.3%	8.4%	Line 13 / Line 15	16

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3

This concludes my prepared supplemental testimony.

4

1 **IV. WITNESS QUALIFICATIONS**

2 My name is Jennifer Reynolds. My business address is 8330 Century Park Court, San Diego,
3 California 92123. I am employed as the Manager of Business Services for the Customer Care
4 Department for SDG&E. My current responsibilities include managing the strategy, relationships,
5 and customer experience for business customers. This professional experience with business
6 customers gives me insight into their needs and concerns related to rates, operational energy
7 requirements, and infrastructure-related issues. I have worked for SDG&E since June 2015. Prior to
8 joining SDG&E, I was employed by Sempra Energy from November 2009 through June 2015.

9 I received a Bachelor of Psychology degree in 1999 from the University of California, San
10 Diego. I received a Master of Business degree from the San Diego State University in 2015.

11 I have previously submitted testimony before the California Public Utilities Commission.