1. For each of the 212 existing DCFC charging stations served by the Company, please identify the costs that the Company incurred to connect the station that would have been required to serve the station’s maximum hourly/15 minute load, regardless of the timing of that load.

**SDG&E Response:** The costs incurred to serve a customer is partially dependent on that customer’s maximum load. Pursuant to Section 8380 of the California Public Utilities Code, SDG&E is prohibited from disclosing a customer’s electrical or gas consumption data except with the consent of the customer or in other limited circumstances that do not apply. As the DCFC charging stations in SDG&E service territory are owned by a discrete set of customers, aggregation or anonymization of the data would not suffice to comply with law.

1. Please provide the basis for the subscription rates, with all computations.

**SDG&E Response:** As stated in the Prepared Direct Testimony of William G. Saxe, “…SDG&E proposes for policy reasons to replace the demand charges found in standard M/L C&I rate design with subscription charges and higher energy charges…SDG&E proposes that the non-coincident distribution demand charge ($/kilowatt [kW]) in Schedule AL-TOU be converted to a dollar per month charge called a Subscription Charge. This Subscription Charge recovers the non-coincident distribution demand costs allocated to Schedule AL-TOU based on current Schedule AL-TOU non-coincident demand charges”.[[1]](#footnote-2) The “EVHP Workpapers Chapter 2” provides the calculations for the proposed EV-HP Subscription Charge.

1. Please provide any analysis that SDG&E has prepared on the variation of AL-TOU customer billing demand among months, such as the ratio of the average of the 12 monthly billing demands to the maximum billing demand.

**SDG&E Response:** SDG&E has not performed any analysis on the variation of AL-TOU customer billing demand among months.

1. For each AL-TOU customer, please provide the customer’s monthly billing demand for each billing cycle in 2017–2019 to date, masking customer identity.

**SDG&E Response:** See response to Question 3.

1. Please provide the basis for structuring the subscription rates in 25-kW blocks rather than allowing each customer to select a subscription level in kW.

**SDG&E Response:** SDG&E believes that structuring the subscription charge in 25 kW blocks represents a balance between a simple rate structure that will minimize monthly bill fluctuations and allow customers to easily choose their preferred subscribed demand level, and a subscription rate that broadly reflects the actual maximum demand of the customers.

1. Please provide the monthly metered demand for each of the 212 existing DCFC charging stations served by the Company, for each month the Company has served that station.

**SDG&E Response:** In accordance with Decision 16-08-024, the requested monthly meter data for existing DCFC charging stations is within the scope of data protected as confidential under applicable statutory provisions.

DCFC meter data cannot be sufficiently anonymized to be publicly shared due to the low number of DCFC operators in SDG&E service territory.

1. Please provide any analysis the Company has conducted regarding the likely ratio of customer subscribed demand in 25-kW blocks to customer all-time actual maximum non-coincident load under the proposed EV-HP rate.

**SDG&E Response:** SDG&E has not performed this analysis.

1. Please provide any analysis the Company has conducted regarding the likely ratio of customer subscribed demand to the average of the customer monthly demand under the proposed EV-HP rate.

**SDG&E Response:** SDG&E has not performed this analysis.

1. Please explain whether the Company believes that the same subscription charge is appropriate for three customers with identical charging equipment (e.g., six chargers) and the same maximum demand, if one uses its six chargers simultaneously every day for 12 hours/day; a second uses the six chargers simultaneously once per month and otherwise no more than two chargers; and the third uses the six chargers for one hour in each of April, July and November, and otherwise no more than two chargers.

**SDG&E Response:** As proposed the EV-HP subscription charge recovers the non-coincident distribution demand costs. SDG&E incurs these costs independent of energy usage, regardless of when an individual customer’s maximum demand occurs. SDG&E would incur the same non-coincident distribution demand (kW) costs to serve the three hypothetical customers listed above, justifying that these customers should pay the same monthly subscription charge regardless of their energy use and when their maximum demand occurs. However, their bills would differ due to the quantity (kWh) they each used throughout the billing period.

1. Please explain whether the Company believes that the subscription charge is appropriate for customers whose facilities are used only lightly in some months, such as a school with 10 chargers, that is largely empty in summer, using only one or two chargers in July and August.

**SDG&E Response:** See above response to question 9. SDG&E would incur the same non-coincident distribution demand costs to serve customers with light load in some months as a similar customer with consistent usage.

1. Prepared Direct Testimony of William G. Saxe, pp. WS-1 and WS-2. [↑](#footnote-ref-2)