1. Regarding the dynamic load profile data that was provided in response to UCAN Data Request Set 2, question 6:
   1. Is the hour column hour beginning or hour ending?
   2. Is the data presented in standard time, daylight savings time, or apparent time?

**SDG&E Response:**

a. The columns in dynamic load profiles are energy at hour ending.

b. The data is presented in Pacific Standard Time.

1. Regarding the behind-the-meter generation and consumption data provided in response to UCAN Data Request Set 2, question 14: total generation exported to the grid by behind-the-meter generation in the residential class was approximately 1,301 GWh in 2019 and total energy imported from the grid by the residential class that year was 6,526 GWh. Dividing those numbers means that behind-the-meter exports supplied 20% of residential grid-supplied energy in 2019. Is that correct? If not, please explain what the 20% fraction represents.

**SDG&E Response:** The data provided in response to UCAN Data Request 2 question 14 has two components. 14a was the estimated rooftop solar generation, while 14b represents the hourly energy delivered to customers by the Utility. While some a portion of the rooftop generation is exported to the grid, and subsequently delivered to other customers, that ratio cannot be calculated using the sets of data provided in that response. The response to question 5 and 6 in this data request contains the amount of excess generation exported to the grid by customers with rooftop solar, and can be used to calculate the ratio between generation and exports.

1. Regarding SDG&E’s response to UCAN Data Request Set 2, question 5, on rate and sales forecast changes between GRCs:
   1. Please explain SDG&E’s rationale for updating its sales forecast in between GRCs without updating the revenue allocation factors to reflect changes to the sales forecast?
   2. Does SDG&E intend to update its revenue allocation factors between this proceeding and its next GRC Phase 2 proceeding? Why or why not?
   3. When the rates are updated for the consolidated rate filing, are the billing determinants used to estimate rates adjusted to reflect the current year’s sales forecast? Meaning a January 1, 2023 consolidated rate change would use a sales forecast for 2023? If not, what sales forecast is used?

**SDG&E Response:**

1. Decision (D.) 17-08-030, which addressed SDG&E’s 2016 GRC Phase 2 application, approved SDG&E’s 2016, 2017, and 2018 electric sales forecasts. In D.17-08-030, the Commission also approved SDG&E’s request for an extension of time to file its 2019 GRC Phase 2 application and to bifurcate the submittal of SDG&E’s proposed 2019 electric sales forecast from all other aspects of its 2019 GRC Phase 2 application. As SDG&E stated in its 2016 GRC Phase 2 application, there is no mechanism for adjustments of sales forecasts in interim years between Phase 2 proceedings. Because SDG&E requested an extension to file its 2019 GRC Phase 2, SDG&E filed Application (A.) 18-03-003, “Application of SDG&E for Approval of its 2019 Electric Sales Forecast,” to update its 2019 sales to be able to implement a more accurate sales forecast prior to the resolution of the 2019 Phase 2. If SDG&E had not filed A.18-03-003, the 2018 sales approved in D.17-08-030 would still be in effect until the implementation of a decision in this proceeding, and the variance between actual and authorized sales creates greater volatility to customer rates and bills due to the impact of balancing accounts intended to capture these differences.
2. SDG&E had no plans to update revenue allocation factors outside of a GRC Phase 2 proceeding at this time.
3. When rates are updated for the consolidated rate filing annually on January 1, the sales forecast used is the most recently adopted sales forecast. If a decision had adopted a 2023 sales forecast, then the adopted 2023 sales forecast would be implemented on January 1, 2023. However, if there is no updated adopted sales forecast, no update will be made to the sales forecast in the consolidated rate filing.
4. Regarding SDG&E’s response to UCAN Data Request Set 2, questions 11 and 12: why didn’t SDG&E update the allocation factors to be consistent with the sales forecast from D.18-11-035 when implementing the current PPP component rates referenced in the data request?

**SDG&E Response:** SDG&E updates its allocation factors in its GRC Phase 2 applications, there is no mechanism for adjustments of the allocation factors in interim years between Phase 2 proceedings.

1. Regarding SDG&E’s response to UCAN Data Request Set 2, question 10: Please explain why SDG&E’s proposal to keep revenue allocation fractions from the prior GRC Phase II proceeding, fractions that are based on an outdated sales forecast of prior years, is a better way to “balance the Commission’s adopted RDPs” and decrease rate shock than just giving all rate classes the same average rate increase?

**SDG&E Response:** As indicated in SDG&E’s response to UCAN Data Request Set 2, question 10, the revenue allocations for the Distribution, Commodity, Competition Transition Charge (“CTC”), and Local Generation Charge (“LGC”) rate components are based on current effective revenue allocations, which were adopted in the Revenue Allocation Settlement of SDG&E’s 2016 GRC Phase Decision D.17-08-030. SDG&E believes that maintaining the current revenue allocations (except as to accommodate the new Schools Customer Class) is the best way to balance the Commission’s adopted Rate Design Principals of customer understanding and rate stability in this Application.

1. Similar to the data provided in response to CalPA data request #21, please provide annual hourly DG export data (channel 2 meter readings) for each rate class for year 2018 and 2019 (if available), including the new schools class. Please provide the data in Microsoft Excel format.

**SDG&E Response:** See embedded Excel file labeled UCAN\_DR\_03\_SDG&E Responses Q6 and Q7.



1. Similar to the data provided in response to CalPA data request #21, please provide annual hourly DG export data (channel 2 meter readings) for each rate class for year 2017, 2018 and 2019 (if available), but without putting schools into their own rate class. Please provide the data in Microsoft Excel format.

**SDG&E Response:** See the embedded file in Q6 labeled UCAN\_DR\_03\_SDG&E Responses Q6 and Q7.

1. Has SDG&E studied how exports of behind-the-meter generation to the grid by net-energy metered customers impact revenue allocation and/or rate class average rates? If so, when was the most recent study? Please provide a copy of the results of the study or a link to where those results can be found. If not, why not, and does SDG&E plan to do such a study in its next GRC Phase II Application?

**SDG&E Response:**

To date, SDG&E has not studied how exports of behind-the-meter generation to the grid by NEM customers impacts revenue allocation and/or class average rates. SDG&E is considering whether to undertake a study of this nature in its next GRC Phase 2 application.

1. SDG&E’s responses to UCAN Data Request Set 2, questions 32 and 33 state that both substation and circuit peak loads are based on the maximum demand of substations. How do the circuit peak loads and substation peak loads vary if they are both based on the maximum annual demand of substations?

**SDG&E Response:**

The response to Question 33 of UCAN DR-02 should state that “The circuit peak loads used in the regression analysis are based on the sum of the annual maximum demand of circuits.”

1. Regarding SDG&E’s response to UCAN Data Request Set 2, question 40: based on this response, “number of runs” does not refer to the number of meters connected to each service drop.
   1. Does SDG&E account for the number of meters connected to each service drop in estimating marginal TSM costs?
   2. If so, please explain how the number of meters per service drop is accounted for and provide the estimated number of meters per service drop for each rate class.
   3. If not, why not?

**SDG&E Response:**

1. Yes.
2. The TSM costs calculated for each customer account reflects service drops to hook-up one meter to serve each customer. The number of meters for each rate class is equal to the number of customers for each rate class, which can be found in the “Total Customers” tab of 2019 GRC Phase 2 Chapter 5 revised workpaper titled “Ch\_5\_WP#2\_Marg Cust Costs for Non School Class Revised” for the number of meters for non-school customers and in the “Total Customers” tab of 2019 GRC Phase 2 Chapter 5 revised workpaper titled “Ch\_5\_WP#3\_Marg Cust Costs for School Class Revised” for the number of meters for school customers.
3. See response to Question 10b.
4. The following question refers to the Supplemental Testimony of Kenneth E. Schiermeyer.

If the sales forecast is adjusted as SDG&E proposes, will SDG&E also adjust the revenue allocation fractions? Why or why not?

**SDG&E Response:**

At this time, SDG&E does not plan to adjust the revenue allocation fractions if the Commission approves the 2022 forecast through a separate application filed at a later date. As described in the Supplemental Testimony of Kenneth E. Schiermeyer, the scope of the proposed 2022 Sales Forecast application would be very similar to SDG&E’s 2019 electric sales forecast application (A.18-03-003) and would not include marginal costs or revenue allocations.

The following questions refer to the Second Revised Direct Testimony of Gwendolyn R. Morien.

1. Please refer to page GRM-17 lines 16-17, where SDG&E proposes: “[t]o maintain the commodity cost recovery rate design for EECC schedules TOU-DR-1, TOU-DR-2, DR-SES, EV-TOU, EV-TOU-2, and EV-TOU-5.”
   1. Please explain why SDG&E has three separate EV rates for residential customers instead of one?
   2. Please provide the number of customers and the amount of retail sales in kWh billed under each of the following rate tariffs for each month of 2018 and 2019:
      1. EV-TOU
      2. EV-TOU-2
      3. EV-TOU-5
   3. What are the TOU pricing differentials used to set rates for each of the following rate tariffs and how were they determined?
      1. EV-TOU
      2. EV-TOU-2
      3. EV-TOU-5

**SDG&E Response:**

1. SDG&E offers residential customers three options for EV rates. Schedule EV-TOU is a rate that is applicable to separately metered EV charging, while Schedule EV-TOU2 is a whole house EV rate where EV consumption is not separately metered. Schedules EV-TOU and EV-TOU2 have a lower super off-peak rate relative to SDG&E’s untiered TOU non-EV optional rate. Schedule EV-TOU5 is a whole house rate with a $16 monthly service fee and an untiered TOU rate that has a distribution and transmission exemption for the super-off-peak period.

SDG&E believes in providing customers with meaningful choices so they can make economical decisions based on price signals.

1. See the attached file “UCAN\_DR02\_Q12b.xlsx”



1. EV-TOU, EV-TOU2, and EV-TOU5 do not have set TOU differentials.
   1. EV-TOU – the commodity differential is cost based, from SDG&E’s 2016 GRC Phase 2 Marginal Commodity Cost Study. The distribution rate component Super-Off-Peak TOU period excludes distribution demand costs per D.18-05-040. All distribution demand costs are recovered through the on-peak and off-peak periods.
   2. EV-TOU2 – the commodity differential is cost based, from SDG&E’s 2016 GRC Phase 2 Marginal Commodity Cost Study. The distribution rate component Super-Off-Peak TOU period excludes distribution demand costs per D.18-05-040. All distribution demand costs are recovered through the on-peak and off-peak periods.
   3. EV-TOU5 – the commodity differential is cost based, from SDG&E’s 2016 GRC Phase 2 Marginal Commodity Cost Study. To encourage EV charging at night and when marginal prices are low, the super off-peak TOU period is exempt from transmission rate component charges, and all distribution rate component costs are recovered through a monthly service fee or in the on-peak and off-peak TOU periods, so there are no volumetric energy distribution charges during the super off-peak TOU period.
2. Please refer to Attachment C, pages 12-13. Why are the total proposed rates for the residential EV rate tariffs (EV-TOU, EV-TOU-2, EV-TOU-5) so low in the overnight super off-peak period compared to midday off-peak period, even though charging EVs during the daytime can absorb solar generation and decrease pollutant emissions from electric generation?

**SDG&E Response:**

As stated in SDG&E’s response to question 12, the Super off-peak period rates for EV-TOU, EV-TOU2, and EV-TOU5 are lower compared to other TOU period pricing to encourage overnight charging year-round when marginal energy prices are low. SDG&E’s TOU periods were adopted in the 2016 GRC Phase 2 and implemented on December 1, 2017. The TOU periods adopted reflect marginal energy and generation costs. Additionally, the 2016 GRC Phase 2 decision required an additional Super Off-peak period from 10AM – 2PM in March and April, which will encourage charging during the middle of the day. SDG&E’s current standard TOU periods are consistent across all customer classes, as commodity TOU prices reflect system conditions.