**DATA REQUEST**

**Q1**. Please list all SDG&E rate schedules for which the DISTRIBUTION rates are time varying. (This list should include AL-TOU, because 61% of distribution demand charges are peak-related), as well as other similar rate schedules.

**SDG&E Response:**

The following rate schedules have a time-varying component in currently effective base distribution rates for either demand charge, volumetric, or dynamic pricing rate components:

* Schedule AL-TOU (on-peak demand charges)
* Schedule AL-TOU2 (TOU demand charge with Super Off-Peak period exemption and on-peak demand charges)
* Schedule DG-R (volumetric)
* Schedule A6-TOU (on-peak demand charges)
* Schedule VGI (dynamic rates)
* Schedule GIR (dynamic rates)
* Schedule PA-T-1 (TOU demand charges with Super Off-Peak period exemption)
* Schedule TOU-PA2 (TOU demand charge with Super Off-Peak period exemption)
* Schedule EV-TOU (volumetric)
* Schedule EV-TOU2 (volumetric)
* Schedule EV-TOU5 (volumetric)

**Q2.** Does SDG&E currently have any rate schedules with Volumetric TOU distribution rates?

If so, please list those rate schedules.

**SDG&E Response:**

See response to Q1. Rate schedules labeled (volumetric) have volumetric distribution rates that have differing prices by TOU period.

**Q3**. In the following sub-parts, please refer to the graph below, from SDG&E’s May 3, 2019 Supplemental Testimony in this proceeding.



1. Does SDG&E agree that fewer than 10% of its distribution circuits peak between midnight and 6:00 am? If not, why not?
2. Does SDG&E agree that marginal distribution costs should vary by time of use? If not, why not?
3. Does SDG&E agree that marginal distribution costs should be lower for super-off-peak usage than for off-peak usage? If not, why not?
4. Hypothetically, would SDG&E find it reasonable to propose TOU distribution rates in the future? If not, why not?
5. Does SDG&E believe that DA, CCA, and other non-bundled customers should, in the future, be subject to TOU UDC rates? If not, why not?

**SDG&E Response:**

a. For the time period displayed in the chart (2016), fewer than 10% of SDG&E’s distribution circuits peaked between midnight and 6:00 AM.

b. As stated in the testimony of SDG&E witness Saxe, the portion of SDG&E’s capacity-driven distribution costs that are on-peak related should be reflected in an on-peak demand charge.

c. The marginal distribution costs that are capacity-driven should be allocated to the on-peak period. All other costs should be allocated equally among remaining TOU periods, as they do not have a time-varying component.

d. SDG&E has existing rate schedules with time-varying components of base distribution.

e. SDG&E has existing rate schedules that have time-varying UDC components. If those schedules are available in the future, customers who meet the eligibility requirement may take service on them. SDG&E supports customer choice and is not in the position to opine on what CCA should or should not offer.