DATA REQUEST

**SDG&E responds as follows to all questions below:**

SDG&E objects to this request as exceeding the scope of permissible discovery under Rules 10.1 and 12.6 of the Commission’s Rules of Practice and Procedure, to the extent that it seeks information that is privileged and/or subject to confidentiality protections under Rule 12.6 governing settlement, and on the grounds that the burden, expense and intrusiveness of this request clearly outweigh the likelihood that the information sought will lead to the discovery of admissible evidence. Subject to and without waiving this objection, SDG&E responds as follows:  Please refer to confidential settlement communications provided under the protection of Rule 12.6.

Q1. With regard to the issue of simplification of SDG&E’s tariffs, i.e., providing combined tariffs showing both UDC and Commodity rates, as well as total rates, as provided in SCE’s and PG&E’s tariffs, and as proposed in the City of San Diego’s Direct Testimony (April 6, 2020, pp.6-9), and SDAP’s Rebuttal Testimony (May 4, 2020, pp.17-19), please answer the following:

1. Would SDG&E commit to publishing a cost and feasibility study of establishing combined tariffs in the next Rate Design Window (“RDW”), with a timetable for implementing combined tariffs in the 2024 GRC Phase 2 proceeding? Please assume, for the purpose of this question, that SDG&E will file an RDW in 2022.
2. If SDG&E will not make such a commitment, please explain why, given the obvious customer benefits of tariff simplification, SDG&E would not commit to providing a tariff simplification study in a 2022 RDW Application, if filed.
3. Prior to any implementation of tariff simplification, would SDG&E consider designing a web-based tariff interface, that would provide customers with total rate information reflecting both the UDC tariff and the Commodity tariff? For example, such a web-based tariff interface could work as follows:

When someone goes on the SDG&E website to search for a UDC rate (say, AL-TOU), there could be a button: “SEE TOTAL RATE”

Clicking on that button would pop up a menu of available EECS (Commodity) rate options, with a short descriptive blurb beside each option.

When the customer chooses one of these options, say, EECS-CPP-D:

A window opens showing a spreadsheet with the total rate calculated, by component, and by function (D, T) and G, and displays the total rates for each TOU period, including both energy charges and demand charges.

SDAP believes this should be simply a programming exercise and should not take more than a one to 3 months for an experienced programmer. This “interim programming solution” proposal would not require any changes to the underlying tariffs for its implementation.

1. If SDG&E is receptive to such an “interim programming solution”, would SDG&E commit to its implementation within 6 months of a final decision in A.19-03-002?
2. If not, by what date would SDG&E commit to having such an “interim programming solution” implemented?

Q2. Several parties have proposed bifurcating (or trifurcating) the current M/L C&I rate class, for possible implementation in the 2024 GRC Phase 2. Assuming that SDG&E would do a study to determine the logical “break points” for bifurcation (or trifurcation), would SDG&E commit to doing and submit such a study, with workpapers, in its next RDW, and prior to the 2024 GRC Phase 2?

1. If not, please explain why it would be infeasible for SDG&E to make such a commitment?
2. If SDG&E cannot commit to filing such a study in its next RDW, would it commit to filing such a study (as well as the data and analysis underlying the study) six months before it files its 2024 GRC Phase 2 so that parties will have adequate time to perform their own analyses of SDG&E’s data?

If not, why not?