

UTILITY CONSUMER ADVOCATES NETWORK (UCAN) DATA REQUEST
UCAN-SDGE-01
SDG&E POWER YOUR DRIVE EXTENSION (A.19-10-012)
SDG&E RESPONSE
DATE RECEIVED: APRIL 6, 2020
DATE RESPONDED: APRIL 16, 2020

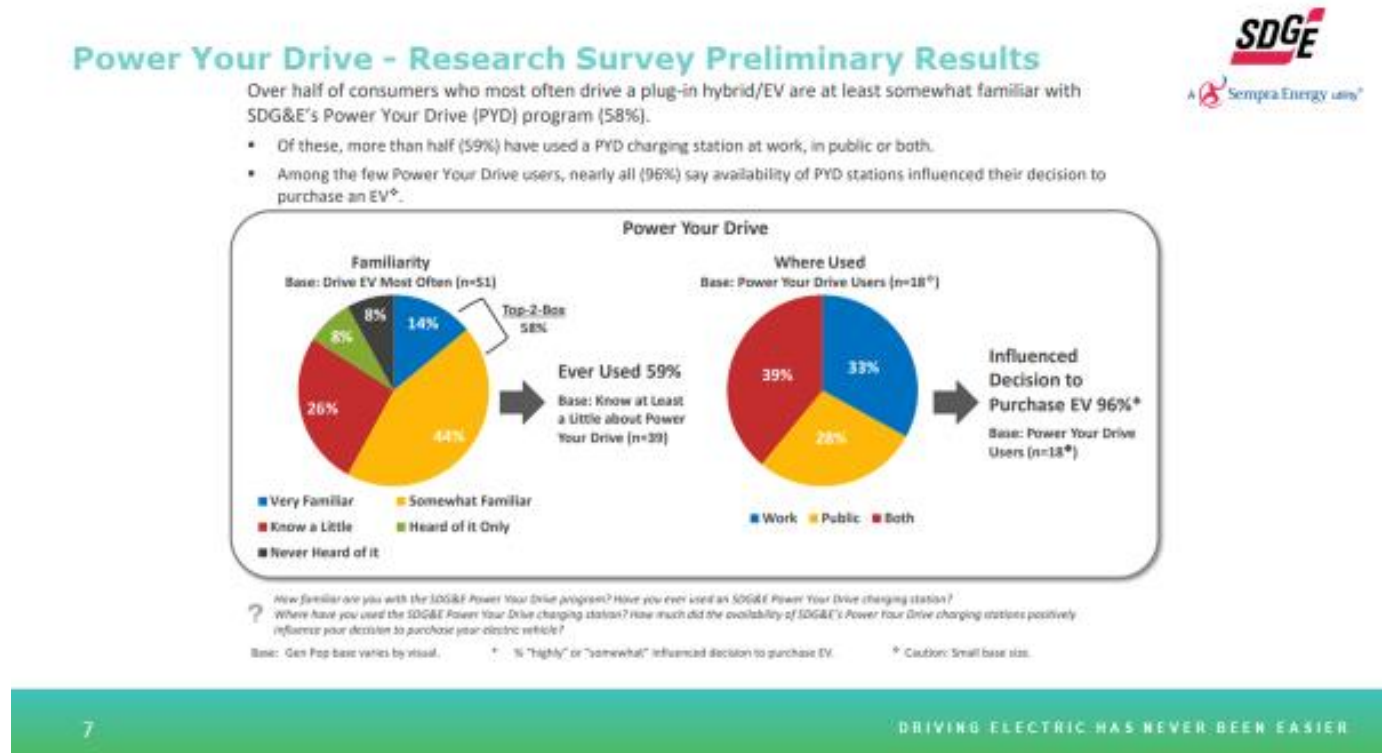
UCAN DATA REQUEST

General

1. SDG&E's "Electric Vehicle-Grid Integration Pilot Program ("Power Your Drive") Seventh Semi-Annual Report of San Diego Gas & Electric Company (U902-E)" page 21 states that surveys of customer and driver decisions to adopt PEVs will be provided when they are implemented. Please provide the surveys and survey results if they are available. If the surveys or survey results are not available, please state when SDG&E expects them to be available.

SDG&E RESPONSE

SDG&E performed a customer survey of Power Your Drive Customers which was shared with the Program Advisory Council ("PAC") on April 7, 2020. Below are the two slides compiling the survey results that were shared with the PAC.

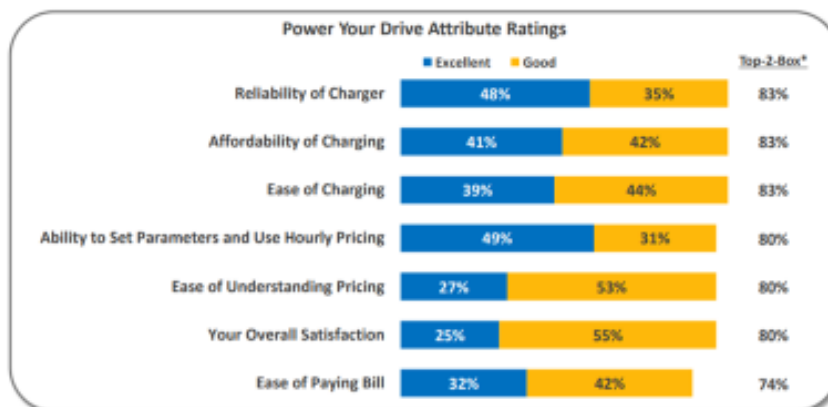


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Power Your Drive - Research Survey Preliminary Results
(cont.)



Most of the handful of participants who have used Power Your Drive are satisfied with the program and its key attributes. "Ease of paying the bill," ranks slightly lower than the other attributes.



? Please rate the SDG&E Power Your Drive charging station on each of the following.

Base: Gen Pop Power Your Drive Users (n=18)*.

* Caution: Small base size.

* Top-2-Box on a 5-point scale.

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2. SDG&E's "Electric Vehicle-Grid Integration Pilot Program ("Power Your Drive") Seventh Semi-Annual Report of San Diego Gas & Electric Company (U902-E)" page 10, Figure 9: Percent of load occurring during Off-Peak and Peak hours, EV TOU charging times are compared with PYD charging times.

- a. Please provide PYD charging times separately for MUD and workplace sites by interval hour in the same format as the data request response "TURN DR 02 10e.xlsx" tab Q10e.
- b. Please confirm that all sites represented in Figure 9 served under Schedule EVTOU and DR rates are single-unit residential sites. If that is not the case, please specify the sites included and provide the breakdown of sites by site type in Excel Format.

SDG&E RESPONSE

- a. The attached file (UCAN DR 1 Q2A) shows average hourly MUD and Workplace consumption.
- b. SDG&E cannot confirm that all sites served by schedules DR and EV-TOU are single unit residential sites. Schedule DR is optionally available to customers in single family dwellings, flats, and apartments.¹ Sites that are not single-family homes may take service under these schedules and SDG&E does not know what type of building is associated with that account.

¹ Schedule DR, http://regarchive.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_DR.pdf

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Chapter 1

3. SDG&E Testimony Chapter 1, pages BAS-1 – BAS-2 state that SDG&E is seeking to extend and modify the PYD Pilot program and that the PYD Extension Program “will serve as a bridge to satisfy a portion of the existing demand.” Please clarify whether SDG&E is proposing the PYD Extension Program as an extension of the pilot program or as stand-alone commercial-scale program serving similar sites to the PYD Pilot Program.

SDG&E RESPONSE

SDG&E is proposing Power Your Drive Extension Program as a bridge program to meet the immediate demand until a more robust future program can be approved and implemented.

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4. Please identify any pilot programs proposed by SDG&E that the Commission has approved in the past ten years that did not include a specific budget authorization by the Commission.

SDG&E RESPONSE

SDG&E is not aware of any pilot programs proposed by SDG&E that were approved by the CPUC in the last ten years that did not include a specific budget authorization by the Commission.

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Chapter 2

5. SDG&E Testimony Chapter 2, page RS-2 identifies MUDs and workplaces as the customer segments served by this program. With respect to these customer segments please:
- a. Provide hourly usage by month separately for MUD and workplace sites installed under the PYD Pilot for each year from 2016 through 2019 in Excel format.
 - b. Provide any forecasts of hourly usage by month for MUD and workplace that SDG&E has prepared for sites installed under the PYD Extension Program.
 - c. Provide usage by time of use period for all sites installed under the PYD Pilot and separately for MUD and workplace sites installed under the PYD Pilot for each year from 2016 through 2019 in Excel format.
 - d. State whether SDG&E expects the usage by time of use period for MUD and workplace sites installed under the PYD Extension Program to be similar to the usage per time of use period for sites installed under the PYD Pilot and explain the basis for that expectation.
 - e. Provide the annual average electric vehicle charging load (in kWh) served per installed site under the PYD Pilot Program in each year from 2016 through 2019 separately for MUD and workplace sites.
 - f. Does SDG&E expect the electric vehicle charging load (in kWh) served on average at each MUD and workplace site under the PYD Extension Program to be similar to the PYD Pilot average load per site identified in question 1.c. above? Please explain the basis for SDG&E's expectation.
 - g. State whether SDG&E has analyzed how alternative charging locations such as Direct Current Fast Charging (DCFC) stations may impact the customer demand for MUD and workplace charging? If SDG&E has done so, please provide any forecasts or analyses that SDG&E has conducted regarding the market penetration of DCFC locations and DCFC electric vehicle charging loads.
 - h. If SDG&E has not analyzed how DCFC stations may impact customer demand for MUD and workplace charging, explain whether SDG&E believes that they may serve a similar role in serving customer electric vehicle charging demand as MUD and workplace charging. If SDG&E does not believe that these facilities may serve a similar role, please explain the different roles that SDG&E believes that these facilities will play in serving customer demand and the basis for SDG&E's belief, including any supporting evidence.

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SDG&E RESPONSE

- a. Hourly usage by month is provided in the attached file (UCAN DR 1 Q5A). This information is marked confidential as the data cannot be sufficiently aggregated to protect customer private information. This information is being provided under an NDA and should not be disclosed publicly.
- b. SDG&E has not created hourly forecasts for consumption from potential site hosts on the PYD interest list.
- c. The attached file (UCAN DR 1 Q5C) provides the consumption by TOU period.
- d. SDG&E generally expects to see similarities in the load profiles of MUD and workplace sites in the PYD Pilot and the PYD Extension Program. For example, workplace sites will likely continue to have higher levels of consumption during the daytime and weekdays when people are typically at work. While SDG&E expects to see some differences in consumption between sites, the timing of usage will largely be determined by site characteristics.
- e. Average annual site consumption is provided in the attached file (UCAN DR1 Q5E). Average consumption per site understates likely consumption at those sites because not all sites included in the site count for a given year were active for the entire year. For example, a site that was energized in December of 2018 would still contribute to the 2018 site count even though it only has one month of consumption. A portion of this information is marked confidential as the data cannot be sufficiently aggregated to protect customer private information. This information is being provided under an NDA and should not be disclosed publicly.
- f. Site consumption varies due to a number of factors making it difficult to predict how consumption might differ between programs.
- g. SDG&E has not conducted this analysis.
- h. DCFC charging and MUD and workplace charging is expected to play complimentary roles in supporting the state reaching 5 million zero-emission vehicles by 2030 .

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6. SDG&E Testimony Chapter 2, page RS-9, lines 10-13 states that “SDG&E continues to believe that utility-owned and maintained charging stations reduce barriers to EV adoption by providing an easier and all-inclusive customer experience for adopting EV charging stations and creating a higher level of maintenance and reliability for the stations after they have been deployed.” With respect to this statement, please provide the following:

- a. All evidence, including any reports, studies, or other documentation and analyses referenced by SDG&E, supporting SDG&E’s belief that third-party (i.e. non-utility)-owned and maintained charging stations currently pose a barrier to EV adoption.
- b. All evidence, including any reports, studies, or other documentation and analyses referenced by SDG&E, supporting SDG&E’s belief that utility-owned and maintained charging stations create a higher level of maintenance and reliability for the stations after they have been deployed compared with third-party ownership.
- c. All evidence, including any reports, studies, or other documentation and analyses referenced by SDG&E, supporting SDG&E’s belief that utility-owned and maintained charging stations offer an easier and all-inclusive customer experience for adopting EV charging stations compared with third-party ownership.

SDG&E RESPONSE

a. The statement in question 6a does not correctly characterize SDG&E’s position regarding barriers to EV adoption that is presented in testimony. It is true that some 3rd party charging station installations pose barriers to EV adoption because there are not specific requirements for those 3rd party site hosts to keep the charging stations well-maintained and available (see photo examples below). This can leave EV drivers without reliable locations to charge when needed and doesn’t make a positive impression on potential EV owners when these 3rd party charging stations are not repaired in a timely manner. SDG&E believes that utility ownership and maintenance / repair services help to ensure that the affected charging assets will be repaired promptly when needed and kept available for drivers.

In addition, from Chapter 1 testimony on page BAS-6, SDG&E states that utility owned and maintained charging stations help to increase the availability of charging infrastructure at MUDs and workplaces and are critical to reducing the barriers to EV ownership, particularly for customers who do not live in owner occupied single-family homes and cannot easily install charging equipment at their own homes.

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b. SDG&E is responsible for the maintenance and reliability of charging stations owned by the utility in their various TE programs. Money has been budgeted for maintenance, and processes and procedures are in place to monitor the charging stations owned by the utility and to dispatch maintenance personnel when the stations have operational issues.

There is less utility and CPUC oversight of 3rd party-owned charging stations. Many site hosts are conscientious and perform the monitoring, maintenance and repair functions when necessary, but the Plugshare.com website has plenty of examples of driver comments about 3rd party owned charging stations that are not operational or well-maintained.

c. As described in testimony, utility-owned and maintained charging stations offer an easier and all-inclusive customer experience for adopting EV charging stations as compared with third-party ownership. For example, SDG&E is proposing to offer utility ownership and maintenance in the PYD Extension Program at MUD sites. A site host can express their interest to participate by self-nominating on SDG&E's website or at an SDG&E outreach event.

SDG&E will manage all aspects of designing the electric service, procuring, installing, operating, monitoring, maintaining, and repairing the EV charging stations at the MUD location in a turn-key fashion for the site host. That is the very definition of easy and all-inclusive.

For a 3rd party ownership example, the site host has to get much more involved in the aspect of purchasing, and managing the installation and operation of the charging stations. The site host has to pay for the stations, hire project management to design and install the charging stations, perform operational functions, manage the billing, monitor the charging station performance, and schedule and pay for maintenance and repairs. Some site hosts are okay with this role, but during the PYD Pilot many site hosts told SDG&E that charging stations are not their core business and they preferred that SDG&E manage the installation, operation, and maintenance of the stations.

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Out of order Level 2 EVSE at Kohls Santee

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Inoperable Level 2 EVSE at San Diego State University

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7. In SDG&E Testimony Chapter 2, pages RS-2, it states that “[i]nfrastructure and charging equipment will be deployed over a two-year period after initial program set-up.” This schedule is elaborated on in “PYD Extension Chapter 3 Workpapers Final.xls,” tab Monthly Site Construction.

l. Please provide an excel spreadsheet with a schedule of the planned and actual installations per month for the Power Your Drive (PYD) Pilot in the same format as “PYD Extension Chapter 3 Workpapers Final.xls,” tab Monthly Site Construction.

m. Please provide an excel spreadsheet with the construction start dates by “Site Unique Identifier” for each PYD Pilot site installation in the same format as the data request response, “CalPA DR-01 Q2.xlsx” tab Q. 2b.

SDG&E RESPONSE

l. Please see Excel file UCAN DR-01 07, tab Q. 7L for the actual site installations compared to planned installations for PYD Pilot.

m. Please see Excel file UCAN DR-01 07, tab Q. 7M.

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8. In SDG&E Testimony Chapter 2, page RS-6, it states “The participation payment for non-DAC utility owned MUD sites will increase approximately 50% (as compared to the PYD Pilot) from \$235/port to \$350/port.”

- a. Please explain how SDG&E calculated both the \$235/port and \$350/port values and provide a workpaper showing the calculation. If either calculation appears in SDG&E’s public workpapers, please provide a reference to the workpaper file, tab, and cell(s) where the calculation can be found.
- b. Please explain the reasons SDG&E’s proposed non-DAC participation payment for the PYD Extension Program is 50% higher than the payment for the PYD Pilot.
- c. Please explain how the participation payments are incorporated in SDG&E’s calculation of the PYD Extension Program cost and resulting revenue requirements. Please either provide a workpaper showing this calculation or a specific reference to the workpaper file, tab, and cell(s) where the calculation can be found.
- d. Please state whether SDG&E is proposing to maintain the participation payment schedule adopted by the CPUC Energy Division for the PYD Pilot in the Energy Division’s December 16, 2016 letter responding to SDG&E Advice Letter 2886-E (page 7). The approved participation payment schedule from that letter is provided below for convenience.

Table 3. Approved SDG&E Participation Payment Schedule

Site Host Type	Participation Payment
Multi-Unit Dwellings	0.15 * Payment Basis * # of EVSE Installed
Workplaces	0.4 * Payment Basis * # of EVSE Installed
Disadvantaged Communities ²¹	0

SDG&E RESPONSE

- a. The original participation payment logic was approved through an Advice Letter submittal to the Commission (AL 2886-E) after consultation with the PAC.² The term “Payment Basis” above in Table 3 was proposed to be the average of the per-port costs for EVSE that were submitted by vendors into the PYD Pilot’s Request for Proposals process. After evaluating the vendor submittals, the Payment Basis was determined to be \$1,633.33 per port. For MUD sites, the participation payment was then calculated to be $(0.15 \times \$1,633.33) = \245 per port.

² SDG&E Advice Letter 2886-E, approved on December 16, 2016 on pg. 7.
<http://regarchive.sdge.com/tm2/pdf/2886-E.pdf>

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The original participation payment of \$245 per port for MUDs in the PYD Pilot was increased by approximately 50% in the application for the PYD Extension Program in order to have site hosts contribute a higher amount of funds to the project.

b. As mentioned in testimony on page RS-14, SDG&E will continue to seek out appropriate non-utility sources of funding to alleviate some ratepayer funds in the PYD Extension Program. Because there has been continuing interest in the PYD Pilot after the stations were installed in the form of an ongoing interest list, and the fact that the original payment amounts didn't dissuade potential site hosts from participating, SDG&E feels that increasing the amount of the participation payment for non-DAC sites in the PYD Extension program would be a good way to seek out additional non-utility sources of funding for the project. The approximate 50% increase was estimated as a good balance between the old participation payment amount, and what would still be a good value proposition for the site hosts in the PYD Extension program.

c. SDG&E estimated \$200,000 in participation payment credits from site hosts for the PYD Extension program. The payments are treated as an offset to the overall ongoing maintenance costs. This is consistent with how participation payments offset ongoing maintenance costs in the PYD Pilot program's memorandum account. The cost estimates are included in the PYD Extension Chapter 3 workpapers and can be viewed on the "Maintenance by Month" tab.

d. SDG&E is proposing to modify the schedule as shown in Table 3 of Advice letter 2886-E for the PYD Pilot in the PYD Extension Program. Row one of the table (for MUD sites) would be a flat \$350/port (approximately a 50% increase). Row two in the table for workplaces would not be applicable, since the site hosts at workplaces will own and maintain their EVSE and will not have to pay a participation payment. Row three would stay the same for DAC sites (\$0 participation payment).

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Chapter 3

9. Page JB-1 provides a site breakdown indicating that 75% of sites will be at workplaces and 25% will be at MUDs. This page also notes that these and other assumptions are approximations. Under SDG&E's proposal, would the PYD Extension Program have any constraint on the percentage shares of workplace and MUD sites beyond a 25% MUD site minimum identified in Chapter 2 of SDG&E's testimony? For example, could the program ultimately consist of 25% workplace and 75% MUD sites?

SDG&E RESPONSE

SDG&E must actively manage the ratio between workplace vs. MUD sites to achieve the budgetary goals of the project.

The program is unlikely to consist of 25% workplaces and 75% MUD sites. First, the budget is unlikely to support 75% MUD sites due to those sites often costing more than workplaces. Second, MUD sites are more difficult to recruit. SDG&E specified the ratio between the two different types of sites based on lessons learned in the PYD Pilot project and interested site hosts.

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10. SDG&E Testimony Chapter 3, page JB-4, Table 3-2 provides PYD Extension Program construction direct cost estimates. Please provide identical tables with annual data for each PYD program year (i.e. 2016 through 2019).

SDG&E RESPONSE

Please see the table below for actual costs as of July 2019 using data from the seventh semi-annual PYD Pilot report. All construction direct costs for a site in the table are shown in the year the site was energized.

PYD Pilot Program - Construction Direct Costs

	Quantity	2016	2017	2018	2019	Total
Workplace Sites	154					
Lots	137	\$0	\$1,495,988	\$17,486,971	\$2,487,148	\$21,470,107
Structures	17	\$0	\$0	\$4,561,321	\$615,835	\$5,177,155
MUD Sites	100					
Lots	59	\$0	\$904,851	\$4,999,006	\$439,011	\$6,342,868
Structures	41	\$0	\$304,691	\$4,310,838	\$2,855,758	\$7,471,288
Site Construction Total:	254	\$0	\$2,705,531	\$31,358,136	\$6,397,751	\$40,461,418
Average Cost Per Site:						\$159,297

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11. SDG&E Testimony Chapter 3, page JB-5, Table 3-5 provides PYD Extension Program direct cost estimates by year. With respect to this table, please:

- a. Provide a table showing direct cost estimates for each year separately for MUD and workplace sites.
- b. Provide a table showing actual annual direct costs for the PYD program for each year 2016 through 2019 for MUD separately for MUD and workplace sites.

SDG&E RESPONSE

a. Please see the table below for site specific cost estimates.

PYD Extension: Direct Cost Estimate by Year

(Capital Costs in Millions, 2019\$)

	2021	2022	2023	2024	Total
MUD Sites	\$2.3	\$5.0	\$0.0	\$0.0	\$7.3
Workplace Sites	\$0.0	\$12.3	\$3.9	\$0.0	\$16.3
	\$2.3	\$17.3	\$3.9	\$0.0	\$23.6

b. Please see the table below; site costs are shown in the year a site was energized.

PYD Pilot: Actual Direct Costs

<i>(\$ in Millions)</i>	2016	2017	2018	2019	Total
MUD Sites	\$0.0	\$1.2	\$9.3	\$3.3	\$13.8
Workplace Sites	\$0.0	\$1.5	\$22.0	\$3.1	\$26.6
	\$0.0	\$2.7	\$31.4	\$6.4	\$40.5

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12. SDG&E Testimony Chapter 3, pages JB-1 – JB-2 provides a list of PYD Extension Program site assumptions and states that using those assumptions and “cost information obtained from the construction of approximately 250 PYD Pilot sites” SDG&E compiled construction direct cost estimates for each site type. Page JB-3 and page JB-4, Table 3-2 then provide an average construction cost per site estimate of \$118,109. With respect to this estimate, please:

- c. Explain why SDG&E’s estimated average construction cost per site is \$70,890 less than the PYD Program average direct construction cost per site provided on page 11 of SDG&E’s October 1, 2019 Semi-Annual PYD Pilot Program Report.
- d. Identify any specific underlying cost estimates and assumptions that SDG&E expects to materially lower the per site cost relative to the PYD Pilot sites, including in the cost elements listed in SDG&E workpaper “PYD Extension Chapter 3 Workpapers Final.xls,” tab Const. Cost Breakdown-Site Type.

SDG&E RESPONSE

c. Engineering design costs of \$7.4 million are included in the referenced semi-annual report table for PYD Pilot. Engineering cost estimates are not included in table 3-2 of the PYD Extension testimony. Also, the PYD Extension cost estimate includes an illustrative site mix that assumes ten ports installed at each site. Actual site installations for the PYD Pilot program averaged approximately twelve nozzles installed at each site, which leads to a higher average cost per site for the PYD Pilot program compared to the PYD Extension estimates.

d. In the PYD Extension estimates, SDG&E assumes a lower cost per site for engineering design and no estimates for IT billing system upgrades compared to the PYD Pilot program.

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13. SDG&E has proposed that the PYD Extension Program consist of 75% workplace sites and 25% MUD sites (see SDG&E Testimony Chapter 3, page JB-4, Table 3-2). SDG&E's October 1, 2019 Semi-Annual PYD Pilot Program Report identified 49% of sites as MUD sites and 51% of sites as workplace sites. Please state whether SDG&E expects this difference in the percentage of MUD and workplace site types to impact its estimated average cost per site. If SDG&E's response is anything other than an unequivocal "no" please state by how much SDG&E expects this difference to impact its estimated average cost per site.

SDG&E RESPONSE

No, SDG&E will actively manage a site mix that meets market needs within an approved budget.

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14. SDG&E Testimony Chapter 3 lists the following cost approximations on page JB-2:

- \$2K/site for high side connection
 - \$2K/site for standby costs
 - \$5K per site of construction change order funding is included in estimates
- a. Please confirm that these are average values that SDG&E has assumed apply to every site included in the PYD Extension Program. If this is not the case, please explain in detail what these costs represent and how they are incorporated in SDG&E's Chapter 3 workpapers.
- b. Please state the percentage of PYD Pilot sites that incurred construction change order costs for the program as a whole and separately for the following site types: 1) MUD parking lot, 2) MUD structure, 3) workplace parking lot, and 4) workplace structure.
- c. Please state the average PYD pilot high side connection, standby, and construction change order costs per site for the following site types: 1) MUD parking lot, 2) MUD structure, 3) workplace parking lot, and 4) workplace structure.
- d. Please explain why SDG&E applied a single average PYD Pilot cost for each of these items to all PYD Extension Program sites rather than calculating separate averages for MUD parking lot, MUD structure, workplace parking lot, and workplace structure sites, or alternatively separate averages for MUD and workplace sites

SDG&E RESPONSE

a. Yes, the estimated average values for high side connections, standby costs, and construction change orders apply to all sites included in the PYD Extension Program estimates.

b. Approximately 69 of 254 (27%) PYD Pilot sites incurred construction change orders and below is a breakdown by site type:

- 1) MUD parking lots – 14 sites
- 2) MUD structures – 10 sites
- 3) Workplace parking lots – 34 sites
- 4) Workplace structures – 11 sites

c. No change orders were incurred for standby and high-side connection costs on PYD Pilot. The table below shows the average cost of construction change orders in thousands by site type for sites with change orders:

- 1) MUD parking lots – \$18K
- 2) MUD structures – \$24K
- 3) Workplace parking lots – \$24K

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4) Workplace structures – \$12K

The average construction cost per site for change orders across all 254 PYD Pilot program was \$5,662.

d. The use of program average costs from the PYD Pilot program is a more reasonable basis of estimate for these costs than a more granular breakdown because the actual site mix and site conditions for the proposed PYD Extension program are currently unknown.

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Chapters 5 and 6

15. SDG&E Testimony Chapter 5 states on page CWB-6 that “SDG&E will determine the actual capital and any applicable O&M costs of the PYD Extension Program as it is completed and will calculate the actual revenue requirements associated with those costs for recovery in rates. Details on cost recovery of the actual revenue requirement are discussed in the testimony of Jenny Phan [Chapter 6].” SDG&E Testimony Chapter 6 states on page JP-1 that SDG&E “proposes a two-way interest bearing balancing account to record the authorized revenue requirement, actual incremental costs associated with the PYD Extension Program, which will provide approximately 2,000 electric vehicle charging ports, and participation payments received from site hosts.” With respect to these statements, please:

- a. Confirm that under SDG&E’s PYD Extension Program proposal, Commission approval would include no specific Commission-authorized revenue requirement or budget cap and that revenue requirements would be determined on an ongoing basis through SDG&E’s proposed two-way balancing account.
- b. If SDG&E disagrees with the statement in question 1.a. above, clarify what specific annual or total revenue requirement and/or budget cap SDG&E is proposing for Commission authorization.

SDG&E RESPONSE

- a. SDG&E’s application seeks approval of an authorized revenue requirement which would be recorded in a two-way balancing account. If approved as proposed, SDG&E’s forecasted revenue requirement as presented in Testimony Chapter 5 would go into rates, however it will be matched up with the actual revenue requirement and any delta will be collected or given back to ratepayers.
- b. SDG&E’s application seeks approval of a revenue requirement of \$125.6 million over the years 2021 through 2084, as described in the testimony of Casey Butler.

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16. SDG&E Testimony Chapter 6, page JP-2 states that SDG&E's proposed PYD Extension Program balancing account would be used "until a time when the costs associated with the electric vehicle charging ports described in this instant application are incorporated into SDG&E's base business and addressed in its GRC proceeding, at which time SDG&E will propose to close the PYD2BA." Please state the year in which SDG&E expects to be able to close the PYD2BA (i.e. the year in which the costs associated with the electric vehicle charging ports are incorporated into SDG&E's base business).

SDG&E RESPONSE

SDG&E currently estimates to be able to close the PYD2BA (i.e. the year in which the costs associated with the electric vehicle charging ports are incorporated into SDG&E's base business) in 2023.

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17. SDG&E Testimony Chapter 6, page JP-2 states that “during the installation period (estimated to be completed in 2023), any over/under-collection in the PYD2BA will be carried forward to the following year.” Please clarify whether this statement means that SDG&E will not collect any balances from this account through rates until installations under the PYD Extension Program are completed.

SDG&E RESPONSE

This statement means that SDG&E will not be collecting any balances from this account through rates until installations under the PYD Extension Program are completed. Any over/under-collection in the PYD2BA will be carried over to the following year until the installation is completed (estimated to be in 2023).

END OF RESPONSES