

UCAN DATA REQUEST – SDG&E RESPONSE
Data Request #03
SDG&E RESIDENTIAL UNTIERED ELECTRIFICATION RATE - A.21-09-001
DATE RECEIVED: January 4, 2022
DATE RESPONDED: January 19, 2022

General Objections:

SDG&E objects to the definitions and instructions included in this data request on the grounds that they are overbroad, unduly burdensome, and seek information that is irrelevant to the subject matter involved in the pending proceeding and/or not reasonably calculated to lead to the discovery of admissible evidence, and therefore, beyond the requirements of CPUC Rule of Practice and Procedure 10.1. SDG&E also notes that special interrogatory instructions of this nature are expressly prohibited by California Code of Civil Procedure Section 2030.060(d).

SDG&E further objects to the continuing and indefinite nature of this request on the grounds that it is unduly burdensome. Continuing interrogatories are expressly prohibited by California Code of Civil Procedure Section 2030.060(g). SDG&E will provide all responsive documents in existence at the time of its response. Should UCAN seek to update its request, SDG&E will respond to such a request as a new data request in the future.

1. Please provide CONFIDENTIAL responses to other parties' data requests.

SDG&E Response:

Please see the attached responses, confidentiality declarations, and confidential documents, identified as follows:

Cal Advocates DR01

- SDGE CalAdvocates DR001 SDGE Response A.21-09-001
- CONFIDENTIAL – Illustrative Rate Design_A2109001
- Confidentiality Declaration of Hannah Campi_CalAdvocates-001

Cal Advocates DR02

- SDGE CalAdvocates DR002 SDGE Response A.21-09-001-Q1
- CONFIDENTIAL – A2109001 – CalPA DR02_Q1
- CONFIDENTIAL – A2109001 – CalPA DR02_Q1b
- Confidentiality Declaration of Hannah Campi_CalAdvocates-002 Q1

Cal Advocates DR04

- CalAdvocates DR004 SDGE Response A.21-09-001 (“Updated_CONFIDENTIAL – Illustrative Rate Design_A2109001” provided in response to UCAN DR01).

San Diego Community Power DR01

- SDCP DR01 SDGE Response A.21-09-001 (“CONFIDENTIAL – Illustrative Rate Design_A2109001” is also part of Cal Advocates DR01)

Solar Energy Industries Association DR01

- SEIA DR01 SDGE Response A.21-09-001 (“Updated_CONFIDENTIAL – Illustrative Rate Design_A2109001” provided in response to UCAN DR01).

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2. Does SDG&E know of any residential customers with behind the meter storage alone without solar in its service area? If so, how many?

SDG&E Response:

Yes, As of 1/11/22, SDG&E knows of 26 residential customers with standalone behind-the-meter storage devices interconnected through Electric Rule 21.

Re: SDG&E response to Cal Advocate Data Request #02, question 2.a.i “*SDG&E used aggregated 2019 historical load profiles from different customer types (by customer size (annual consumption), CARE status and EV rate) to analyze bill impacts using current rates and rates proposed in this application.*”

3. Please describe in detail how the historical load profiles were created. E.g., Are they a simple average across all hours of customers in each profile group, and if not, then what?

SDG&E Response:

The historical load profiles were created by taking an average of all customers within a profile group at each hour.

Re: SDG&E response to UCAN Data Request #02, question 5(b)

4. How did SDG&E arrive at a scalar of 4 to convert the hourly usage to a peak demand?

SDG&E Response:

A scalar of 4 allowed for a range of illustrative bill impacts in all 4 proposed fixed charge tiers. Without applying a scalar, the profiles shown would only fall into the 1st and 2nd proposed tier, and not allow for illustrative bill impacts for higher tier customers.

Re: SDG&E response to UCAN Data Request #01, question 9:

5. Is it correct that the fixed charge in TOU-ELEC will be reset annually, based on the anniversary date of the customer taking service under TOU-ELEC? If this is not correct, when and how would the fixed charge be reset?

SDG&E Response:

Yes, see Revised Direct testimony of H. Campi at HC-10, lines 5-8: “SDG&E is proposing a fixed monthly customer charge that would be set annually at one of four tiers using the average of a customer’s top 3 monthly non-coincident demand (NCD) peaks over 12 months. The resulting demand would be used to set the customer charge for one year, after which it would be recalculated using the most recent 12 months of usage data.”

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6. What time interval will the demand used to calculate the fixed charge be based on? E.g., average use over a 15-minute interval, highest instantaneous peak, etc.

SDG&E Response:

Peak demand would be measured based on one hour intervals.

Re: Updated_CONFIDENTIAL - Illustrative Rate Design_A2109001.xls

7. Tab “Commodity Rate Design.” Columns B and C reference SDG&E-16, Prepared Rebuttal Testimony of Benjamin A. Montoya, A. 19-03-002. Please provide the referenced testimony with the specific values noted/highlighted.

SDG&E Response:

SDG&E objects to the request to the extent it would require SDG&E to search their files for matters of public record in CPUC regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.). This information is equally available to UCAN, which appears to have been a party to CPUC regulatory proceedings that might have relevance to its questions. Notwithstanding any and all objections, SDG&E responds as follows:

While referencing the requested workpaper in question 7, SDG&E realized the marginal cost values in its workpaper “Updated_CONFIDENTIAL - Illustrative Rate Design_A2109001.xls” was linked to a version of its marginal commodity cost study that was not the final version. Updating these values will result in changes limited to commodity rate design. Because, as described in testimony, SDG&E adjusted the differentials between the off-peak and super off-peak periods, and because the bundled sales determinants used in the workpaper have not changed, the final rate design is not impacted by this update. As intervenor testimony was served 1/14/2022 and because of the limited impact this change will have, SDG&E plans to update these values in its rebuttal testimony.

Public workpapers for SDG&E’s GRC Phase 2 can be found at the following address:

<https://www.sdge.com/sites/default/files/regulatory/WorkpaperCh6.zip>

8. Tab “Tiered Customer Charge.” Rows 2,4 and 6 reference SDG&E-15, Prepared Rebuttal Testimony of William Saxe, A. 19-03-002. Please provide the referenced testimony with the specific values noted/highlighted.

SDG&E Response:

SDG&E objects to the request to the extent it would require SDG&E to search their files for matters of public record in CPUC regulatory proceedings (filings, testimony, transcripts, decisions, orders, etc.). This information is equally available to UCAN, which appears to have been a party to CPUC regulatory proceedings that might have relevance to its questions. SDG&E will not search through their files for or produce matters of public record in CPUC regulatory proceedings. Notwithstanding any and all objections, SDG&E responds as follows:

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The workpapers for the 2019 GRC Phase 2 Chapter 5 (Workpaper 1) testimony can be found at the following address:

<https://www.sdge.com/sites/default/files/regulatory/Chapter%205.zip>

9. Tab “Marginal Distribution Rate.” What is the source of the values in the “Marginal Rate” Column? Please provide the source with the values in the “Marginal Rate” column noted/highlighted.

SDG&E Response:

The values are from SDG&E’s 2019 GRC Phase 2, Chapter 5 Workpaper 1. See response to Question 8.

10. Where the marginal costs used in this workpaper approved for any purpose by the CPUC? If yes, please provide a page citation to the approving decision. If not, please explain why SDG&E believes that these are appropriate marginal costs to use for setting the TOU-ELEC rate.

SDG&E Response:

The marginal costs used in the workpaper “Updated_CONFIDENTIAL – Illustrative Rate Design_A.2109001.xls” were not explicitly approved by the CPUC. The marginal costs presented were originally presented in SDG&E’s 2019 General Rate Case (GRC) Phase 2 marginal distribution and marginal commodity cost studies. These marginal costs form the rate design basis of SDG&E’s current effective rates today. The current effective rate design was approved by the CPUC in D.21-07-010 and implemented per SDG&E Advice Letter 3855-E. SDG&E’s marginal cost studies, as presented in the 2019 GRC Phase 2, are based on subject matter expert testimony of witnesses intimately familiar with SDG&E’s marginal costs, and are the best estimate of SDG&E’s marginal costs. Therefore, the aforementioned marginal costs are the appropriate basis to set SDG&E’s proposed TOU-ELEC rate.