



Public Advocates Office

at the
California Public Utilities Commission

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Public Advocates Office Data Request

A.19-03-002: San Diego Gas & Electric Company (SDG&E) 2019 General Rate Case Phase 2

Date: 9/14/2020

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Response Due Date: September 28, 2020

Re: Data Request No. CAL ADVOCATES—01

INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the ORA contact(s) above with a copy to the ORA attorney.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify ORA as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify ORA as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

DATA REQUESTS

SUBJECT: REAL-TIME PRICING SUPPLEMENTAL TESTIMONY

The following questions relate to JARP's supplemental testimony, served on August 31, 2020:

1. In your supplemental testimony on p. 4-5 in Tables 2 and 3, you present illustrative real-time pricing (RTP) rates for residential and non-residential customers. A simpler way to construct the rates in Tables 2 and 3 would have been to omit the DWR-BC and EECC rates and the eight associated RTP and C-CPP credits (shown in red) and to merely include the single commodity base rate from the VGI rate schedule. Please explain why this might have led to either an over or under-collection from customers relative to the rates shown in Tables 2-3.
2. In Figure 1 on p. 7, JARP provides a graph showing day-of 5-minutes RTPs for the SDG&ED Default Load Aggregation Point (DLAP) on August 15, 2020, the day that rolling blackouts occurred.
 - a. Please provide a frequency distribution indicating the total number of 5-minute intervals that this SDG&E DLAP price exceeded \$0.20, \$0.40, \$0.60, \$0.80, and \$1.00 per kWh during the years 2018 and 2019.
 - b. For each count in Part a above, please indicate how many of each of those 5-minute intervals fall in adjacent 15-minute intervals, given that the actual billing will be done on 15-minute intervals that each aggregate three 5-minute intervals.
 - c. Please confirm that the total number of 5-minute intervals in a year is 105,120 (= 8,760 hours per year x 60/5 intervals per hour).
3. Please clarify the following concerning the \$7.26 annual cost shift from structural beneficiaries to residential non-participating customer, listed on p. 11 of your testimony:
 - a. The \$7.26 annual cost shift in your testimony assumes that more than 10% of residential customers signed up for the proposed RTP-DR rate (given that this 10% represents only structural beneficiaries), and

- b. The \$7.26 annual cost shift could not happen if the 3% cap on residential participation proposed on p. 17 were applied. What percentage of participants are expected to be structural beneficiaries?
4. In Table 4 on p. 14, bill savings are shown in the first two columns. For example, an average residential participant shifting 25% of his or her load would save \$28.17 per year.¹ Please indicate the average bill size for each of the customers shown in the table and what percentage bill reduction each of these bill savings represent.
5. Please indicate how the following costs that would need to be incurred as part of the RTP rate you proposed in your testimony would be allocated between participants and non-participants:
- a. The design and automating of the rate,²
 - b. The cost of required billing system upgrades and meter reprogramming,³
 - c. The cost of hiring a consultant to assess the costs and benefits of the RTP program.⁴
6. Given that there are no estimates of the costs of the items listed in Question #5 above in the supplemental testimony, does JARP know how small a pilot would have to be to do manual billing and have SDG&E's staff do the study in 5.c? Please share any information JARP may have on these implementation costs for a small pilot.

END OF REQUEST

¹ This would be composed of \$10.22 for the RTP part of the bill and \$17.95 for the CPP part of the bill.

² Discussed on p. 10 of supplemental testimony.

³ Discussed in Attachment B of testimony, Questions 2 – 4.

⁴ Discussed on p. 18 of testimony.