

SDAP DATA REQUEST

SDAP-DR 03

Application for Approval of Electric Vehicle High Power Charging Rate (A.19-07-006)

SDG&E RESPONSE

DATE RECEIVED: December 16, 2019

DATE RESPONDED: January 16, 2020

1. Instructions: These questions pertain to SDGE territory. Any time there is work to show, please provide it in the work paper format and a live excel document.
2. Interim Rate: SDG&E Response to SDAP DR 01-04: Yes, some customers who take service on the proposed EV-HP rate may not have chosen to adopt MD/HD EVs or deploy DCFC charging installations in the absence of the EV-HP rate.

1. Do you agree that absence a rate beyond the AL TOU this has negatively impacted fleets that could have been interested in adoption?

1. If not, why not.

SDG&E Response: Yes, SDG&E filed an application for the EV-HP rate in order to accelerate DCFC deployment and MD/HD electrification in SDG&E's service territory.

2. Why did SDGE not offer a rate for fleets in either the SB350 PR or the SR MHD pilot.

SDG&E Response: SDG&E proposed the Commercial Grid Integration Rate in A.17-01-020 which was denied in D.18-05-040.

1. Why have you not offered an interim rate previously?

SDG&E Response: See response to Question 2.

3. Use Case Calculator: SDG&E Response to SDAP DR 01-13: SDG&E has shared the EV-HP prepared testimony Chapter 3 workbooks per a previous data request. This model can be adjusted to estimate different illustrative charging scenarios by altering its inputs and calculation fields.

1. Please provide the specific DR request and response for the location of the model that allows you to alter inputs.

SDG&E Response: The Chapter 3 workpapers were shared in response to CalPA DR #1 and are available in the workpapers section at <https://www.sdge.com/rates-and-regulations/proceedings/ev-high-power-charging-rate>. Input cells are generally highlighted orange in the model.

4. EVSE Subscription or other Fees: SDG&E Response to SDAP DR 01-23 and 23.1:
 1. Yes, SDG&E is subject to subscription and maintenance fees by EV Service Providers in the Priority Review Projects authorized by D.18-01-024. The contracted subscription and maintenance fees paid as part of the Priority Review Projects is confidential.

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1. Did you include these cost in your Use cases? If not, why not.

SDG&E Response: SDG&E did not include EV Service Providers (EVSP) maintenance and subscription fees in the Chapter 3 workpapers. These workpapers are intended to illustrate difference between an illustrative customer's bills on AL-TOU and EV-HP and any EVSP fees are assumed to be the same for both rates.

2. Are fleets like SDGE when owning the infrastructure likely to be subject to these fees beyond the kWh rates?

SDG&E Response: Applicable EVSP maintenance and subscription fees vary based on the EVSP and customer. SDG&E pays various fees to EV Service Providers through programs where SDG&E owns and operates EV Supply Equipment; depending on the approved program architecture this may raise the rate charged per kWh to drivers.

1. Do you agree that these additional fees will impact the operational cost per mile as it is another added expense that is unique to networked EVSE chargers?

SDG&E Response: Yes, maintenance and subscription fees will impact the operational cost per mile.

2. Can you explain these fees to the parties and the commission in order for parties to be able to establish the average cost from these other fees that fleets will likely be exposed to when owning and operating EV chargers?

SDG&E Response: SDG&E cannot speak to the fees charged by third-party EVSPs.

5. SDG&E Response to SDAP DR 01-23.2: There are no Rate to Driver sites in the Priority Review Projects.

1. Please provide answer for the original question which is hereby being corrected by removing the word "sites": "Explain how the subscription and maintenance fees differ between rate-to-driver and rate-to-host.

SDG&E Response: The driver is not the utility customer of record (the Rate-to-Driver billing option in the SDG&E Power Your Drive program) in any Priority Review Project.

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2. Do they differ?

SDG&E Response: See response to Question 5.1.

3. If so, why?

SDG&E Response: See response to Question 5.1.

4. If not, why not.

SDG&E Response: See response to Question 5.1.

5. Are the rate to driver charging sessions paying more for a charging session?

SDG&E Response: See response to Question 5.1.

6. Is so, why, please explain.

SDG&E Response: See response to Question 5.1.

6. SDG&E Response to SDAP DR 01-29.5 regarding an estimate of the number of MD/HD EVs in SDG&E service territory.: SDG&E applied the following filters to the 2017 EMFAC database when SDGE responded to CAL PA's DR 03-9 and that according to the 2017 Mobile Source Emissions Inventory there are approximately 337 electric Class 2-8 vehicles in San Diego County, which roughly aligns with SDG&E service territory.:

- Data type: Emissions
- Region: San Diego County
- Calendar year: 2019
- Season: Annual
- Vehicle category: EMFAC2007 categories, All
- Model year: Aggregated
- Speed: Aggregated
- Fuel: Electric

All electric Class 2-8 vehicles forecasted by the 2017 EMFAC database are Medium-Duty Trucks (GVWR 6,000-8,500lb)

1. https://en.wikipedia.org/wiki/Truck_classification, see the table below depicting the US Classification of vehicles by GVWR. The US Vehicle Classifications chart categorizes the vehicles by GVWR and provides a

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classification based on the GVWR. Based on your response do you agree that all vehicles Listed are a Class 2a.

SDG&E Response: Yes, the 2017 EMFAC database appears to estimate that all electric Class 2-8 vehicles in San Diego County are Class 2a vehicles.

2. If not, why not.

SDG&E Response: See response to Question 6.1.

3. Do you acknowledge that the GVWR in your response does not include any currently available MHD commercial EV fleet vehicles?

SDG&E Response: SDG&E cannot speak to the availability of any specific MD/HD EV models.

1. If not, why not

SDG&E Response: See response to Question 6.2.

4. Do you acknowledge that currently there are no EV trucks available in Class 1 or Class 2?

SDG&E Response: See response to Question 6.3.

1. If not, why not.

SDG&E Response: See response to Question 6.3.

2. Please name all EV Class 2a vehicles currently are available for commercial use and for sale in California.

SDG&E Response: See response to Question 6.3.

5. Do you realize that the 337 vehicles you estimate to CAL PA would establish that based on the GVSR these all are pickup trucks or SUV's based on the GVWR in your answer?

SDG&E Response: SDG&E cannot speak to the accuracy of the EMFAC estimates. As stated in SDAP DR 01, Public Advocates Office DR 3

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Question 9 requested an “order of magnitude” estimate of the number of MD/HD EVs in SDG&E service territory.

6. How do you determine that this aligns with the Service Territory?

SDG&E Response: SDG&E service territory is primarily located within San Diego County.

1. Please explain how you define your answer, “it aligns with the service territory”.

SDG&E Response: A map of SDG&E service territory is available at: <https://www.sdge.com/more-information/our-company/about-us>

7. If this aligns with the service territory, then why did you not include any Class 2 use cases?

https://en.wikipedia.org/wiki/Truck_classification,

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Table of US GVWR classifications [[edit](#)]

US truck class	Duty classification	Weight limit ^{[1][7]}
Class 1	Light truck	0–6,000 pounds (0–2,722 kg)
Class 2a	Light truck	6,001–8,500 pounds (2,722–3,856 kg)
Class 2b	Light/Medium truck	8,501–10,000 pounds (3,856–4,536 kg)
Class 3	Medium truck	10,001–14,000 pounds (4,536–6,350 kg)
Class 4	Medium truck	14,001–16,000 pounds (6,351–7,257 kg)
Class 5	Medium truck	16,001–19,500 pounds (7,258–8,845 kg)
Class 6	Medium truck	19,501–26,000 pounds (8,846–11,793 kg)
Class 7	Heavy truck	26,001–33,000 pounds (11,794–14,969 kg)
Class 8	Heavy truck	33,001 pounds (14,969 kg) +

SDG&E Response: As stated in previous SDG&E responses to SDAP data requests, the use cases estimated in the Chapter 3 workpapers and prepared testimony are illustrative examples only.

7. EMFAC Report by SDGE: Please provide a copy of this workpaper in its original format.

SDG&E Response: This was provided to SDAP in response to SDAP DR 01.

8. How many MHD Electric vehicles are in service in SDGE territory per Class Size:
 1. Class 2

SDG&E Response: SDG&E does not possess this information.

2. Class 3

SDG&E Response: See response to Question 8.1.

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3. Class 4

SDG&E Response: See response to Question 8.1.

4. Class 5

SDG&E Response: See response to Question 8.1.

5. Class 6

SDG&E Response: See response to Question 8.1.

6. Class 7

SDG&E Response: See response to Question 8.1.

7. Class 8

SDG&E Response: See response to Question 8.1.

8. Off-road

SDG&E Response: See response to Question 8.1.

9. Why did you not do a use case for Class 2, Class 3 or Class 4 vehicles?

SDG&E Response: See response to Question 6.7.

10. Charging Behavior beyond Over-night:

SDG&E Response to SDAP DR 01-25.3: The MD/HD illustrative customer use cases presented in the EV-HP Chapter 3 workpapers are illustrative only. Customers will have differing charging behavior.

1. Do you acknowledge that fleets such as airport operations will charge both night and day?

SDG&E Response: Individual customers will have different charging behavior.

2. If not, why not

SDG&E Response: See response to Question 10.1.

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3. Why did you not illustrate different charging behavior beyond 100%-over-night charging.

SDG&E Response: See response to Question 6.7.

11. MHD Pilot Infrastructure Timeline: How long is the average deployment timeline after a site host has signed the agreement and it has been fully executed by all parties.

SDG&E Response: SDG&E objects that this request seeks information that is out of scope, irrelevant or not likely to lead to the discovery of admissible evidence in this proceeding.

1. How long is the average timeline from the agreement to the commissioning of the site and thereby the chargers are fully activated and successfully can be used by the fleet.

SDG&E Response: See response to Question 11.

2. What is the best-case scenario?

SDG&E Response: See response to Question 11.

3. Please provide the timeline for each site project that you have completed in any of the SB350 Pilot Projects.

SDG&E Response: See response to Question 11.

4. If not completed, please provide the current start date of the signed agreement and the current expected timeline to commission the site.

SDG&E Response: See response to Question 11.

5. What is the expected commission date and thereby the total timeline to commission each of the sites?

SDG&E Response: See response to Question 11.

12. Approved Sites: How many MHD fleet sites do you expect to be activated after today's date that are currently approved sites?

SDG&E Response: As of December 30, 2019 SDG&E has not approved any sites in the MD/HD Program.

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13. Future Sites: How many sites do you believe will be activated each of the following years that are not approved yet, but based on what is in your pipeline for interested parties you believe that this is a reasonable estimate on the number of sites.

1. 2019

SDG&E Response: This information will be shared as part of the MD/HD Program Advisory Council.

2. 2020

SDG&E Response: See response to Question 13.1.

3. 2021 before end of Q1

SDG&E Response: See response to Question 13.1.

4. 2021 before end of Q2

SDG&E Response: See response to Question 13.1.

5. Have each of these sites purchased 2 vehicles?

SDG&E Response: Per the SDG&E MD/HD Program requirements participants are required to procure at least two EVs or convert at least two diesel fueled vehicles to electric.

1. What vehicles did they purchase: Quantity and Class size of Vehicle?

SDG&E Response: SDG&E has not begun implementing the MD/HD Program.

2. Did they purchase more than 2 vehicles, if so, how many and what is the class size of the vehicle.

SDG&E Response: See response to Question 13.5.1.

6. What is the current facility tariff rate for each site?

SDG&E Response: As of December 30, 2019 SDG&E has not approved any sites in the MD/HD Program.

14. The Amazon Electric Truck in PR is a Lightning Systems truck per your response in SDAP DR 01 and Q15

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1. Why did you state in your answer that this is a Class 4 vehicle?

SDG&E Response: SDG&E incorrectly stated that the Lightning Systems trucks at the Amazon site are Class 4 vehicles. They are actually Class 3 vehicles.

2. What information do you have that validates these as a Class 4?

SDG&E Response: See response to Question 14.1.

3. What is the GVWR weight of a Class 4?

SDG&E Response: According to the Federal Highway Administration a Class 4 vehicle has a gross vehicle weight rating (GVWR) of 14,001 – 16,000 lb.

4. What is the GVWR of this Amazon vehicle.

SDG&E Response: The Amazon Lightning Systems trucks have a GVWR of 10,360 lb.

1. Please validate the GVWR.

SDG&E Response: See response to Question 14.4.

15. In your PR sites how many of the MHD fleets are only utilizing Level 2 charging?

SDG&E Response: Five Priority Review Project sites are utilizing Level 2 charging only.

16. Are most commercial fleets better off with Level 2 charging?

SDG&E Response: The suitability of specific charging options will differ for different customers.

1. Why? Please explain your answer.

SDG&E Response: See response to 16.1.

17. Why are sites with only Level 2 chargers not eligible for the HP rate?

SDG&E Response: The proposed EV-HP rate is open to separately-metered DCFC and MD/HD EV customers, including MD/HD EV customers that charge with only Level 2 EVSE.

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1. Please explain the reasonableness of not including multiple level 2 chargers from one site.

SDG&E Response: See response to Question 17.

18. Retail Fuel price and entire fuel tax paid by Californian's in each gallon:

1. What is the retail fuel cost of Propane?

SDG&E Response: SDG&E objects that this information is not unique to SDG&E and is not appropriate for discovery, since it is equally available to SDAP.

2. What is the retail fuel cost of CNG?

SDG&E Response: See response to Question 18.1.

3. What is the retail fuel cost of Diesel?

SDG&E Response: See response to Question 18.1.

4. What is the retail fuel cost of Renewable Bio Diesel?

SDG&E Response: See response to Question 18.1.

5. What is the entire fuel tax paid by Californian's for each of the above fuels?

SDG&E Response: See response to Question 18.1.

19. How many PR projects and sites will not be fulfilled?

SDG&E Response: SDG&E objects that this request is vague and ambiguous. It is not clear what "fulfilled" means in this question.

20. SDGE focused on the first SR project as all Level 2 Charging installed for passenger cars and residential charging, this program was approved to install 60,000 chargers; but SDGE decided to not move forward with the project.

1. Explain the reduced metric tons that was expected to be achieved
 1. First year and lifetime.

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SDG&E Response: SDG&E objects that this request seeks information that is out of scope, irrelevant or not likely to lead to the discovery of admissible evidence in this proceeding.

2. Explain how many cars were expected to be charging in the first year and each year thereafter until fully subscribed.

SDG&E Response: See response to Question 20.1.

3. What has SDGE done to over-come the impacts of the air quality that will not be achieved by this project.

SDG&E Response: See response to Question 20.1.

21. Was this the only SR project in your first SB350 application?

SDG&E Response: SDG&E objects that this request seeks information that is out of scope, irrelevant or not likely to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving this objection, “SR” refers to Standard Review.

22. Estimates of the reduced amounts of C02 Metric Tons per year in approved PR and SR projects has changed by the lack of fulfillment of projects in the SDGE territory in both the PR and SR projects either by stakeholders not moving forward or by SDGE choosing to not move forward.

1. List each SR and PR project approved budget amounts.

SDG&E Response: SDG&E objects that this request seeks information that is out of scope, irrelevant or not likely to lead to the discovery of admissible evidence in this proceeding. Subject to and without waiving these objections, SDG&E would point out that such information is available in the relevant Commission decision, which is available to SDAP.

2. List the first year reduced metric tons for each site and each project.

SDG&E Response: SDG&E objects that this request seeks information that is out of scope, irrelevant or not likely to lead to the discovery of admissible evidence in this proceeding.

3. List the lifetime metric tons estimates for each site and each project.

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SDG&E Response: See response to Question 22.2.

4. List the impact on air quality due to these changes and parties not moving forward, list this for both the first year and lifetime metric tons.

SDG&E Response: See response to Question 22.2.

5. Please show a column that shows the results of this change.

SDG&E Response: See response to Question 22.2.

6. Please provide an explanation of why a project will not be fulfilled and why the number of sites approved are not being fully subscribed or why there is reduced participation in the project.

SDG&E Response: See response to Question 22.2.

7. Please do this in a table form.

SDG&E Response: See response to Question 22.2.

23. Due to the need in San Diego County and the Region, how is this lack of fulfillment of the ZEV projects that were already approved budgets ---going to over-come the issues that was intended to improve air quality?

SDG&E Response: SDG&E objects that this request seeks information that is out of scope, irrelevant or not likely to lead to the discovery of admissible evidence in this proceeding. Also, this request is vague and ambiguous.

1. What has SDGE done to ensure that more adoption will be achieved in the region in order to obtain the benefits that SDGE proposed would be achieved.

SDG&E Response: See response to Question 23.1.

2. What are some of the new goals or projects that SDGE has planned that will assist in overcoming the negative impact?

SDG&E Response: See response to Question 23.1.

24. How many sites in the PR or SR are aggregating their loads?

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SDG&E Response: All Priority Review Project sites are separately metered. Participants in the MD/HD Program are not required to separately meter EV load.

1. Are they separately metered?

SDG&E Response: See response to Question 24.1.

2. If not, why not?

SDG&E Response: See response to Question 24.1.

3. Are any of these sites NOT eligible for the HP rate due to this set up?

SDG&E Response: The proposed EV-HP rate is open to separately-metered DCFC and MD/HD EV charging, and is not open to aggregated loads that include building loads.

4. If not, why not?

SDG&E Response: See response to Question 24.3.

25. DAC Properties or Low-Income communities as per the Cal Enviro Screen. (regarding SR MHD Pilot)

1. Do Low Income Communities qualify as DAC?

SDG&E Response: SDG&E objects that this request seeks information that is out of scope, irrelevant or not likely to lead to the discovery of admissible evidence in this proceeding.

2. If not, why not?

SDG&E Response: See response to Question 25.1.

3. Are they eligible for more incentives as it relates to the MHD SR Pilot?

SDG&E Response: See response to Question 25.1.

4. Please explain the additional rebates opportunities for each site or fleet in the SR.

SDG&E Response: See response to Question 25.1.

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26. Transit and School Bus Rebates in SR MHD Pilots:

1. Please explain if both vehicle types are extended the rebates

SDG&E Response: SDG&E objects that this request seeks information that is out of scope, irrelevant or not likely to lead to the discovery of admissible evidence in this proceeding.

1. Please explain the rebates and extra incentives for Transit and School buses

SDG&E Response: See response to Question 26.

2. Transit buses can be purchased by various vocations, for example schools or Churches or Charter or Shuttle operations --- can all use Transit buses

1. Are all vocations eligible for the rebate?

SDG&E Response: See response to Question 26.

2. If not, why not.

SDG&E Response: See response to Question 26.

27. Approved Charger List

1. Please provide a copy of the approved EVSE charger list and specifications of each.

SDG&E Response: SDG&E objects that this request seeks information that is out of scope, irrelevant or not likely to lead to the discovery of admissible evidence in this proceeding.

28. In the GRC 2016, the Time of Use Hours changed, please describe the Total Annual Hours due to this change. Please indicate the Total Annual number of hours before this change and then the current Total Annual number of hours for each window. I am specially looking for the Total Annual Hours for each window below before and after the TOU change. Please show the results of each in comparison.

1. On Peak Total Annual Hours

SDG&E Response: The attached file (“SDAP DR-03, Q28”) provides the total hours for SDG&E’s standard TOU period structure before SDG&E’s 2016 GRC Phase 2 decision (D.17-08-030) was implemented and for SDG&E’s current standard TOU period implemented pursuant D.17-08-030. Please note that the change in SDG&E’s TOU period hours in D.17-08-030 also changed the: (a)

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TOU naming so that the period that used to be called semi-peak is now called off-peak and the period that used to be called off-peak is now called super off peak; (b) the seasonal definition so that the month of May that used to be a winter month is now a summer month; and (c) added unique super off-peak hours for the months March and April.

2. Off Peak (formerly Mid peak) Total Annual Hours

SDG&E Response: Please see the “SDAP DR-03, Q28” file attached in response to Question 28.1 above.

3. Super Off Peak (formerly Off Peak) Total Annual Hours

SDG&E Response: Please see the “SDAP DR-03, Q28” file attached in response to Question 28.1 above.

4. How many annual peak hours increased

SDG&E Response: Please see the “SDAP DR-03, Q28” file attached in response to Question 28.1 above.

5. How many annual Off-peak hours increased

SDG&E Response: Please see the “SDAP DR-03, Q28” file attached in response to Question 28.1 above.

6. How many annual Super Off-Peak hours decreased?

SDG&E Response: Please see the “SDAP DR-03, Q28” file attached in response to Question 28.1 above.

7. How many total annual hours increased

SDG&E Response: As shown in the “SDAP DR-03, Q28” file attached in response to Question 28.1 above, the total hours of 8,760 (365 days multiplied by 24 hours) did not change from the TOU period change.

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8. How many total annual hours increased on weekends

SDG&E Response: As shown in the “SDAP DR-03, Q28” file attached in response to Question 28.1 above, the change in the TOU periods does not change the number of weekend days and thus, there is no change to the total annual hours on weekends.

1. How many days in the year are weekends?

SDG&E Response: As shown in the “SDAP DR-03, Q28” file attached in response to Question 28.1 above, 104 days (52 weeks multiplied by 2 days) in 2019, standard non-leap year, are weekends. Because the change in the TOU periods does not change the number of weekend days, there is also no change to the total annual weekend hours.

9. How many total annual hours increased on Holidays

SDG&E Response: As shown in the “SDAP DR-03, Q28” file attached in response to Question 28.1 above, the change in the TOU periods does not change the number of Holidays and thus, there is no change to the total annual hours on Holidays.

1. How many days in the year are Holidays?

SDG&E Response: As identified in the Holiday definition of SDG&E’s Rule 1 tariff, the TOU periods reflect 8 holidays: (1) New Year’s Day (January 1); (2) President’s Day (third Monday in February); (3) Memorial Day (last Monday in May); (4) Independence Day (July 4); (5) Labor Day (first Monday in September); (6) Veterans Day (November 11); (7) Thanksgiving Day (fourth Thursday in November), and (8) Christmas Day (December 25). When a Holiday listed above falls on Sunday, the following Monday shall be defined as a Holiday. Because the change in the TOU periods does not change the number of weekend days, there is also no change to the total annual weekend hours, as shown in the “SDAP DR-03, Q28” file attached in response to Question 28.1 above.

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10. Please show this in a work paper.

SDG&E Response: Please see the “SDAP DR-03, Q28” file attached in response to Question 28.1 above.

29. Small Business TOU Hours:

1. Share the Standard Small Commercial TOU Hours.

1. Current Two Period TOU.

SDG&E Response: The attached file (“SDAP DR-03, Q29”) provides the TOU hours for Schedule TOU-A, which is the two period TOU rate schedule adopted for small commercial customers in SDG&E’s 2016 GRC Phase 2 decision (D.17-08-030).

2. Describe the Off-Peak hours for small commercial business.

SDG&E Response: As shown in “SDAP DR-03, Q29” file attached in response to Question 29.1, the off-peak hours for TOU-A reflect all hours other than 4 p.m. to 9 p.m. on non-holiday weekdays. Schedule TOU-A off-peak hours in 2019 were 7,495 hours.

3. Describe the Holiday and Weekend Hours compared to Large Commercial plans.

SDG&E Response: The “SDAP DR-03, Q29” file provided in response to Question 29.1 shows that the holiday and weekend hours for Schedule TOU-A are 100% off-peak hours. As shown in “SDAP DR-03, Q28” file provided in response to Question 28.1 above, the holiday and weekend hours under the current standard Medium/Large Commercial & Industrial (“M/L C&I”) TOU structure reflects 5 hours of On-Peak, 5 hours of Off-Peak, and 14 hours of Super Off-Peak per day.

4. The History of when the Flat rate was changed to the TOU.

SDG&E Response: Ordering paragraph 4 of D.12-12-004 adopted mandatory TOU rates for small commercial customers. This requirement

SDAP DATA REQUEST
SDAP-DR 03
Application for Approval of Electric Vehicle High Power Charging Rate (A.19-07-006)
SDG&E RESPONSE
DATE RECEIVED: December 16, 2019
DATE RESPONDED: January 16, 2020

was implemented for small commercial customers over an eight-month period from October 2015 through May 2016.

1. Provide the Release dates of when the changes went into effect.

SDG&E Response: As stated above in response to Question 29.4, D.12-12-004 issued on December 20, 2012 required SDG&E to implement mandatory TOU rates for small commercial customers. SDG&E implemented this requirement for existing small commercial customers over an eight-month period from October 2015 through May 2016.

30. Do you believe small commercial customers comprehend Demand charges?

SDG&E Response: SDG&E cannot speak to the experience of individual small commercial customers.

31. What education has SDGE provided to small commercial customers on Demand Charges?

SDG&E Response: SDG&E provides information on demand charges through its website, account executives, and other educational materials.

32. What tools have you provided to small commercial customers to better manage their usage?

SDG&E Response: SDG&E offers tools like Green Button and the online Business Energy Advisor to help customers manage their energy usage.

END OF RESPONSES