File No. 15341.00561

To: Thomas R. Brill

Senior Counsel & Director

San Diego Gas & Electric Company

8330 Century Park Court, CP32E

San Diego, CA 92123-1530

Email tbrill@sempraUtilities.com

Re: Data Request No. 1 of Valley Center Municipal Water District, Fallbrook Public Utility District, Helix Water District, Padre Dam Municipal Water District, Sweetwater Authority, Yuima Municipal Water District, Vallecitos Water District and the City of Oceanside to San Diego Gas & Electric Company

Date: June 3, 2016

Response Due: June 10, 2016

Please accept this first Data Request from Valley Center Municipal Water District, Fallbrook Public Utility District, Helix Water District, Padre Dam Municipal Water District, Sweetwater Authority, Yuima Municipal Water District, Vallecitos Water District and the City of Oceanside regarding the February 9, 2016 San Diego Gas and Electric Company testimony in the California Public Utilities Commission proceeding no. A.15-04-012. If you will be unable to meet the above deadline, or need to discuss the content of this request, please call me at the number shown above before the due date. If you are unable to provide the information by the due date, please provide a written explanation to me five calendar days before the due date as to why the response date cannot be met and your best estimate of when the information can be provided.

Please provide electronic responses to jason.ackerman@bbklaw.com. Please identify the person who provided the response, his or her telephone number and email, the title of such person(s) and their relationship to San Diego Gas & Electric (“SDG&E”), and the name of the witness or witnesses who will be prepared to testify concerning the matter contained in the response or document produced. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any number is calculated, include a copy of all electronic files so the formula and their sources can be reviewed.

**GENERAL DEFINITIONS AND INSTRUCTIONS**

1. This data request is specifically referencing the February 9, 2016 SDG&E testimony in proceeding no. A.15-04-012 unless otherwise specified.

2. “Documentation” or “document” or “report” or “information” or “model” or “logs” means any written or recorded matter in SDG&E’s custody, possession, or control.

3. In the event that SDG&E asserts that any requested information is confidential or otherwise privileged and not subject to disclosure, please provide the following: (a) a general description of the document, information, or model with respect to which such privilege is claimed; (b) the title of the document, file, or model containing the information; (c) the date of the document or date on which it was prepared; (d) the author or source of the information or model; and (e) the privilege asserted with respect to the document or model. Please also state whether SDG&E would produce the information subject to a confidentiality agreement.

4. In answering each information or production request, please state the text of the request prior to providing the response, and provide the name of the person or persons answering, the title of such person(s), their relationship to SDG&E, and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response or document produced.

5. If SDG&E cannot answer a data request in full, state the answer to the extent possible, state why SDG&E cannot answer the data request in full, and provide what information or knowledge SDG&E has concerning the unanswered portions.

6. If, in answering this data request, SDG&E believes that any data request or definition or instruction is ambiguous, set forth the language SDG&E believes is ambiguous.

7. Please answer the attached data requests no later than June 10, 2016, and please direct your responses to Jason Ackerman at the address and email noted on the title page. If you have objections to any of the data requests, please serve your written objections by June 8, 2016. If you cannot provide full responses to the data requests by June 10, 2016, please indicate by June 8th which data requests will not be available by June 10th and what date they will be available.

8. Responses to the data requests can be electronic (preferred) – via email.

**Question 1. SDG&E-01, Chapter 1, Testimony of Cynthia Fang.**

**1.1 Pg. CF-16, line 17. Please provide tariff definitions of summer on peak and winter on peak periods since 1980. If they remain constant, only changes in period definitions need to be provided, along with the year that the period changes occurred.**

**1.2 Pg. CF-16, lines 19-20. "*That need is based no longer solely on loads, but on “net load,” loads less solar and wind resources in the local reliability area* ... ." Does SDG&E have contracts for central station renewables that are outside of the local reliability area? Does SDG&E have distributed generation and other renewables besides solar and wind in the local reliability area?**

**1.3 Pg. CF-19, lines 19-21. "*SDG&E continues to propose the same TOU periods for all customers and all rate schedules and now proposes the same TOU periods for summer and winter, though with different rates for summer and winter*." Does SDG&E currently have different TOU periods for electric vehicles (EV-TOU and EV-TOU-2) than for many of the other tariffs? Is SDG&E proposing the same TOU period for EV as for other customers?**

**1.4 Pg. CF-20, Table 2. Do the "2016 GRC P2 Proposal" periods apply only to the commodity portion of SDG&E tariffs or does it also apply to other tariff components, such as demand charges?**

**Question 2. SDG&E-02, Chapter 2, Testimony of Christopher Swartz.**

**2.0 Pg. CS-9/10, Tables CS-2 and CS-3. Is Table CS-2 consistent with Table CS-3 - "*revenue allocations by customer class based upon proposed TOU periods*"?**

**Question 3. SDG&E-03. Chapter 3. Testimony of Robert Anderson.**

**3.1 Pg. RBA-1, lines 11-14. Please provide all analysis and supporting documentation (including references) for the statement: "*The proposed changes to the TOU periods will help manage the integration of renewables by increasing demand in midday when solar is producing at its maximum and reducing demand later in the day when solar has reduced output or no output at all."***

**3.2 Pg. RBA-2, lines 12-14. Please provide an estimate of the magnitude of the demand shift due to the proposed changes in TOU periods: *"When implemented, the new TOU periods will create incentives for customers to shift demand from the early evening hours to mid-day."* Please provide this estimate by customer class.**

**3.3 Pg. RBA-2, lines 14-15. "*The analysis includes both historical and expected loads in the San Diego area net of expected solar and wind production in the San Diego Greater Reliability area."***

**3.3.1 Please provide a copy of the analysis referenced in 3.3 above.**

**3.3.2 Do the "*expected loads in the San Diego Area*" referenced in 3.3 above include the impact of changes in rate design, such as advocated in this testimony? If yes, please provide estimate of the impact on the SDG&E hourly net load.**

**3.3.3 Do the "*expected loads in the San Diego Area*" referenced in 3.3 above include the 165 MW of energy storage mentioned in Fang's testimony (Chapter 1, pg. CF-9, line 16)? If yes, please provide estimate of the impact on the SDG&E hourly net load.**

**3.3.4 Do the "*expected loads in the San Diego Area*" referenced in 3.3 above include the electric Vehicle Grid Integration Pilot impacts mentioned in Fang's testimony (Chapter 1, pg. CF-9, lines 10-13)? If yes, please provide an estimate of the impact on the SDG&E hourly net load.**

**3.3.5 Do the "*expected loads in the San Diego Area*" referenced in 3.3 above include the impact of the California ISO regional energy market integration impacts (SB350 analysis) ? If yes, please provide an estimate of the impact on the SDG&E hourly net load.**

**3.3.6 Do the "*expected loads in the San Diego Area*" referenced in 3.3 above include the impact of the microgrids in the SDG&E area? If yes, please provide an estimate of the impact on the SDG&E hourly net load.**

**3.3.7. Lines 14-15 states :"*The analysis includes both historical and expected loads in the San Diego area net of expected solar and wind production in the San Diego Greater Reliability area".* but the figures (RBA-1, RBA-2) state they are "SDG&E local area net of distributed generation and central station renewables." Please explain the discrepancy - where are other renewables and distributed generation besides solar and wind accounted for in the analysis?**

**3.4 In charts RBA-1 and RBA-2, please provide an explanation for the substantial reduction in net load between 2013 and 2014 during the hours 0700 and 1800.**

**3.5 Pg. RBA-4, lines 18-19 and footnote 4. Please provide a copy of the 2021 forecast used. Is it consistent with the California Energy Commission CEC forecast for SDG&E in the 2015 Integrated Energy Policy Report?**

**3.6 Pg. RBA-8, lines 5-9. "*The CAISO performed its own analysis of net loads to determine when surplus and limited supplies might occur and to suggest appropriate TOU periods*."**

**3.6.1 Does the CAIOS analysis include the impact of changes in rate design, such as advocated in this testimony?**

**3.6.2 Does the CAIOS analysis include a projection of the impact of future energy storage?**

**3.6.3 Does the CAIOS analysis include a projection of the impact of 1 million electric vehicles by 2020, and 1.5 million electric vehicles by 2025?**

**3.6.3 Does the CAIOS analysis include the impact of the ISO regional energy market integration (SB350 analysis)?**

**3.6.4 Does the CAIOS analysis include a projection of the impact of microgrids?**

**3.7 Pg. RBA-8 through RBA-11. Pg. RBA-9, line 9 states "*The proposed TOU periods would capture the hours with the highest electricity prices as shown by the shift that began occurring in 2014.*" Do many of SDG&E's time-of-use tariffs include On-Peak Demand Charges in addition to energy charges? Does the proposed change in TOU periods apply only to energy charges in the tariffs as reflected in commodity prices or would it also include on peak demand charges?**

Sincerely,

Jason M. Ackerman

of BEST BEST & KRIEGER LLP

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