

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Consider Staff
Proposal Concerning Revision or Repeal of
General Orders and Utility Reporting
Requirements.

Rulemaking 15-12-006
(Filed December 3, 2015)

**REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY
(U 902-E) ON ASSIGNED COMMISSIONER'S SCOPING MEMO AND
RULING REQUESTING ADDITIONAL COMMENTS ON STAFF PROPOSAL**

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October 6, 2016

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Pursuant to the Assigned Commissioner's Scoping Memo and Ruling Requesting Additional Comments on Staff Proposal dated September 8, 2016 (Scoping Memo) and Rule 7.3 of the California Public Utilities Commission's (CPUC or Commission) Rules of Practice and Procedure, San Diego Gas & Electric Company (SDG&E) hereby respectfully submits its reply comments in response to the Office of Ratepayer Advocates' (ORA) opening comments filed on September 30, 2016.

I. SDG&E'S ADVANCED METERING INFRASTRUCTURE (AMI) REPORTS SHOULD BE DISCONTINUED

ORA states that the quarterly and annual AMI reports are essential to the utilities' reporting for critical peak pricing, demand response, and energy efficiency programs.¹ However, ORA is incorrect in making a connection between the reports and the programs that they reference. SDG&E's reports do not discuss critical peak pricing, demand response, and energy efficiency programs. The only reference which could potentially be related to those programs is the mention of Home Area Network (HAN) devices and the reports only state installations would be managed and funded by Demand Response Programs.

Quarter-to-quarter report changes were limited to meter installation numbers, opt-out customers, and budget updates, which were limited since AMI is no longer a program at SDG&E and all related activities were transitioned to the production support teams. In fact, starting last year, SDG&E's quarterly report stated "SDG&E has proposed closing the AMI Balancing

¹ ORA Opening Comments, at 1.

