



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

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Order Instituting Rulemaking to Consider Smart Grid
Technologies Pursuant to Federal Legislation and on the
Commission's own Motion to Actively Guide Policy in
California's Development of a Smart Grid System

Rulemaking 08-12-009
(Filed December 18, 2008)

**THE REPLY OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) TO
THE OPENING COMMENTS FILED FEBRUARY 9, 2009**

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March 9, 2009

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I. INTRODUCTION

Pursuant to the Commission's Rules of Practice and Procedure Section 6.2 and the procedural schedule set forth in the above entitled Order Instituting Rulemaking (OIR), San Diego Gas & Electric Company (SDG&E) submits this reply to the opening comments filed February 9, 2009.¹ SDG&E remains committed and supportive of the Commission's momentum and direction in developing policy goals to reduce green house gas emissions, increase energy efficiency and demand response, expand renewable energy resources, and improve reliability through development and implementation of Smart Grid technologies. SDG&E regards this OIR as critical to achieving these laudable goals and looks forward to working in a collaborative manner with the Commission, the other utilities and parties, and governmental agencies, such as the California Independent System Operator, the California Energy Commission, and the Department of Energy.

II. PLANNING POLICY

Investor Owned Utilities (IOUs) engage in a wide and ongoing array of activities to ensure safe, reliable and affordable service, including investment in Smart Grid technologies. Smart Grid policy should advance Smart Grid objectives without impeding or interfering with ongoing projects or planning. Requiring a showing that Smart Grid

¹ For ease of reference, regardless of the actual title of each party's February 9, 2009 opening comments, SDG&E shall refer to the opening comments as "Opening Comments," preceded by the name of the party making the comments.

technologies were considered prior to IOU investment in non-advanced technology could impede and interfere with ongoing projects and planning, and would be unduly burdensome.² The development and implementation of Smart Grid technologies should enhance IOU operations and planning without frustrating existing processes.

III. FINANCIAL POLICY

Due to the inherent nature of advanced technology – i.e. high start up costs, greater risks (including obsolescence risks), and steeper customer acclimation/acceptance curves – appropriate financial policy adjustments should be made to ensure Smart Grid development is adequately encouraged. Specifically, Smart Grid assets should be rate based and granted accelerated depreciation, an incentivized Rate of Return should be applied,³ and funding mechanisms should be established for pre-deployment and RD&D activities. The Utility Reform Network's (TURN's) proposal to impose retro-active ratemaking⁴ would chill, if not completely eliminate, Smart Grid investments, and, therefore, should be summarily rejected.

IV. STANDARDS POLICY

To maintain the fluid ability to change and adapt to new circumstances, specific Smart Grid technologies should not be prescribed. Accordingly, open, non-proprietary standards, with interoperability, are ideal. National standards organizations, such as the National Institute of Standards and Technology, the American National Standards Institute, and the Institute of Electrical and Electronics Engineers are likely a good starting point. In order to maintain safe operating conditions and protect customer privacy, however, data access standards must be strict, specific and direct, and the incremental IOU costs of expanded data sharing requirements must be addressed.

² SDG&E Opening Comments at p. 6; Pacific Gas and Electric Company (PG&E) Opening Comments at pp.7-8; Southern California Edison Company (SCE) Opening Comments at pp.14-15; and Enspira's Opening Comments at p.5.

³ SCE Opening Comments at p.15; PG&E Opening Comments at p.8; Enspira Opening Comments at p.6.

⁴ TURN Opening Comments at p.8.

Google proposes basic principles specific to the provisioning of, and access to, customer-specific electricity data, and open data formats.⁵ As just mentioned, SDG&E strongly supports establishment of third party data access standards, and believes the standards should be similar to those applied to data provisioning and access for Direct Access (DA) customers and their energy service providers. The challenge for the IOUs, however, is recovery of the potential incremental cost that will be incurred to build the system interfaces with third parties (even with standardized open formats), and implementation of the proper system controls to insure proper customer authorization and information protection. Accordingly, SDG&E believes the incremental cost associated with such infrastructure development should be fully recoverable, consistent with recovery for DA infrastructure costs.

Google also states that “[e]lectricity usage data should be made available in a standardized, open format, freely available to third-parties with permission from the consumer.”⁶ As just discussed, provided adequate standards and protocols are in place, SDG&E agrees with this statement. As also just discussed, the costs associated to develop and support access to the data should be fully recoverable by the IOU. By the same token, to the extent it can be shared without violating consumer privacy rights, information collected by third parties on consumer usage of their energy information related applications should be provided to the IOUs at no cost. This two way data sharing will help the IOUs better serve customer interests and needs through the programs and services that help customers better manage and control energy usage.

Equal caution must be observed regarding utility-specific data. The Western Power Trading Forum (WPTF) is inappropriately single minded in demanding access to transmission and distribution (T&D) grid information.⁷ Third parties are already kept informed, on a need-to-know basis, of relevant market information. Allowing third

⁵ Google Opening Comments at pp.6-7.

⁶ *Id.*

⁷ WPTF Opening Comments at p.4.

parties expanded access to security sensitive data is completely unnecessary to Smart Grid development, and completely contrary to safety and security objectives.

V. DEMAND RESPONSE AND ASSOCIATED BENEFITS POLICY

The Department of Ratepayer Advocates (DRA) and TURN argue that Advanced Metering Infrastructure (AMI) demand response and related conservation benefits already established in prior IOU AMI proceedings should not be attributable to future Smart Grid investments.⁸ SDG&E disagrees with this perspective. The demand response benefits identified in the IOUs' AMI proceedings are specific to proposed dynamic rate structures (e.g., Critical Peak Pricing, Peak-Time Rebate). These dynamic rates are initiated on a "day-ahead" customer notification and therefore depend specifically on day-ahead forecasts of system conditions. In almost all cases, the AMI demand response benefits that were incorporated in each of the three IOU's AMI proposals are estimated on a system-wide demand response event.

Consequently, the AMI cases do not explicitly include benefits from localized demand response events. Smart Grid technologies will provide geographical, real-time specific information on distribution circuit, branch and transformer levels. This information may facilitate and enable design and application of local area-specific demand side programs that may alleviate temporary local distribution issues, and/or provide distribution system planners a greater number of alternative policy tools to address local system bottlenecks. Smart Grid technologies may very well lead to a new and different class of demand response rates and customer energy information programs that were not contemplated or even feasible with AMI technology alone. The benefits associated with these new and different demand side programs should not be automatically excluded from Smart Grid technology benefits.

⁸ TURN Opening Comments at p.5 and DRA Opening Comments at p.2.

CERTIFICATE OF SERVICE

I hereby certify that a copy of **THE REPLY OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) TO THE OPENING COMMENTS FILED FEBRUARY 9, 2009** has been electronically mailed to each party of record of the service list in R.08-12-009. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Administrative Law Judge Timothy J. Sullivan and Commissioner Rachelle B. Chong.

Executed this 9th day of March, 2009 at San Diego, California.

/s/ Jenifer E. Nicola
Jenifer E. Nicola



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