

Docket No. A.23-01-008

Exhibit No. CSD-1

Date January 8, 2024

Witness William A. Monsen

**DIRECT TESTIMONY OF WILLIAM A. MONSEN
ON BEHALF OF THE CITY OF SAN DIEGO REGARDING MARGINAL
COSTS, REVENUE ALLOCATION, AND RATE DESIGN
IN APPLICATION 23-01-008**

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I. Introduction and Summary of Testimony

Q. Please state your name, position and business address.

A. My name is William A. Monsen. I am a Principal Consultant at MRW & Associates, LLC (MRW). My business address is 1736 Franklin Street, Suite 700, Oakland, California.

Q. Please describe you background, experience and expertise?

A. I have been an energy consultant with MRW since 1989. During that time, I have assisted independent power producers, electric consumers, financial institutions, and regulatory agencies with issues related to power project development, project valuation, purchasing electricity, and regulatory matters. I have directed or worked on projects in a number of states and regions in the United States, including Arizona, Colorado, California, Nevada, New England, and Wisconsin. Prior to joining MRW, I worked at Pacific Gas and Electric Company (PG&E). At PG&E, I held a number of positions related to energy conservation, forecasting, electric resource planning, and corporate planning. I hold a Bachelor of Science degree in engineering physics from the University of California at Berkeley, and a Master of Science degree in mechanical engineering from the University of Wisconsin-Madison.

Q. Have you previously testified as an expert witness?

A. Yes. I have previously testified before the California Public Utilities Commission (Commission) on behalf of the City of San Diego, the City of Long Beach, Bear Mountain, Snow Summit, The Utility Reform Network, the California Farm Bureau Federation, the Independent Energy Producers Association, the California Cogeneration Council, Duke Energy North America, the Alliance for Retail Energy Markets, the Center for Energy Efficiency and Renewable Technologies, the Local Governmental

Commission Coalition, Clearwater Port, Commercial Energy, and The Vote Solar Initiative. I have also submitted testimony in proceedings before the Federal Energy Regulatory Commission as well as state utility commissions in Arizona, Colorado, Massachusetts, Oregon, and Nevada. Additional information about my qualifications is provided in Appendix WAM-1.

Q. What is the purpose of your testimony in this proceeding?

A. My testimony reviews San Diego Gas & Electric's (SDG&E's) application in Phase 2 of its General Rate Case (GRC), Application (A.) 23-01-008.¹

Q. On whose behalf are you testifying?

A. I am testifying on behalf of the City of San Diego (City). However, I am cognizant that the City is a member of San Diego Community Power (SDCP), a Community Choice Aggregation (CCA) program and that the City is concerned about the impacts of SDG&E's proposals in this proceeding on all customer classes.

Q. What are the City's interests in this proceeding?

A. The City is concerned about the potential impact of SDG&E's proposals in this proceeding on the City and its residents and businesses. The City's own accounts, in aggregate, make it SDG&E's second largest customer, having over 3,000 electric service accounts with SDG&E that range from individual traffic lights to large wastewater pumps having loads of almost 7 MW. Of these accounts, the City has 40 accounts that have loads greater than 300 kW. In addition, the City has an active Distributed Energy Resource (DER) program, with over 21 MW of generating capacity currently in operation. These generating resources consist of combined heat and power (CHP) facilities burning landfill gas, biogas-fired generation, hydroelectric generation, and photovoltaic generation. In addition, the City has proposed a very aggressive Climate Action Plan, which aims to meet 100% of the City's loads with renewable resources by

¹ SDG&E has submitted supplements and revisions to its testimony in this proceeding (including a major revision on September 29, 2023). Unless otherwise noted, this testimony responds to SDG&E's most recent testimony.

1 2035.² Finally, the City is developing 5 MW of additional solar PV projects and an
2 expanded use of landfill gas that it controls.

3

4 As of 2021, the City's retail accounts started receiving commodity energy services from
5 SCDP and wires services from SDG&E.

6

7 **Q. How is your testimony organized?**

8 A. My testimony is organized into eight sections (including this introduction). Following
9 this brief introduction and summary section, my testimony is organized as follows:

- 10 • Section II: This section addresses SDG&E's proposal to split the Medium/Large-
11 Commercial/Industrial (M/L-C/I) class taking service under Schedule AL-TOU
12 into two parts, with the dividing line being 200 kW.
- 13 • Section III: This section discusses SDG&E's efforts to avoid combining its Utility
14 Distribution Company (UDC) tariffs with its commodity tariffs, which would
15 simplify its tariffs for customer.³
- 16 • Section IV: This section recommends revising SDG&E's bills for its non-bundled
17 service customers (e.g., customers that take commodity service from third-party
18 suppliers such as SDCP) so that the bills are easier to understand.
- 19 • Section V: This section addresses SDG&E's proposal regarding the timing of
20 filings related to its Critical Peak Pricing (CPP) time periods.
- 21 • Section VI: This section discusses clarifications that are needed related to
22 SDG&E's proposal to extend its weekday 10 a.m.-2 p.m. super-off-peak time-of-
23 use (TOU) time period to all months of the year.
- 24 • Section VII: This section discusses the City's opposition to SDG&E's proposal to
25 significantly revise its Medical Baseline program, which would result in much
26 higher costs to these customers.
- 27 • Section VIII: This section presents a brief conclusion to the testimony.

² City of San Diego, Climate Action Plan Adopted 2015 (Climate Plan), p.35,
https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf

³ SDG&E has selected tariffs that present both UDC and commodity rates in the same tariff, but
that is an exception rather than a rule.

1
2 **Q. Please summarize your recommendations and conclusions.**

3 A. In this testimony, I make the following recommendations on behalf of the City of San
4 Diego:

- 5 1. SDG&E proposes to split the AL-TOU class into two parts, with the dividing line
6 being 200 kW. SDG&E's proposal fails to provide bill impacts resulting from this
7 proposed split. The City believes that a split is still needed but believes that
8 SDG&E has failed to meet its burden to support its proposal. The City proposes
9 that the Commission adopt SDG&E's proposal on an interim basis and provide
10 bill protection for customers until SDG&E and other interested parties design a
11 study of splitting the class that examines options for splitting the class at different
12 levels, provides bill impacts associated with those options, and brings the study to
13 the Commission and other parties in a ratesetting proceeding.
- 14 2. SDG&E opposes combining its commodity and UDC tariffs for an individual rate
15 option into a single tariff. The City demonstrates that SDG&E's rationale for its
16 opposition is misleading. The Commission should order SDG&E to proceed with
17 combining its commodity and UDC tariffs for individual rate options into single
18 tariffs, which would be consistent with how the other large electric utilities
19 structure their tariffs. This would simplify customer use of tariffs.
- 20 3. SDG&E's bills for non-bundled service customers are confusing. This is a direct
21 result of SDG&E's atypical tariff structure of having separate UDC and
22 commodity tariffs. The bills for non-bundled service customers both add and
23 subtract generation costs in a confusing manner. The Commission should order
24 SDG&E to work with customers and third-party commodity suppliers to develop
25 a bill format that is less confusing.
- 26 4. SDG&E proposes to change the frequency of its filings for determining CPP event
27 hours from an annual filing to once per GRC cycle. The City supports less
28 frequent filings but is not convinced that moving from an annual filing to a filing
29 every 4-5 years is appropriate. The Commission should order SDG&E to make
30 these filings every two years, which would reduce burden on SDG&E but also
31 ensure that CPP Event hours do not drift too far from TOU periods.

1 5. SDG&E proposes to extend its weekday super-off-peak hours from 10 a.m. to 2
2 p.m. into all months of the year. The City supports this proposal but is concerned
3 that SDG&E has failed to provide specificity about the impacts of this proposal
4 on all of its tariffs. The Commission should order SDG&E to supplement its filing
5 to specifically list the tariffs to which this change would apply, the specific
6 changes in TOU periods for those tariffs, and how tariffs that do not have base
7 TOU periods would be affected by the change.

8 6. SDG&E proposes an extreme reduction in its Medical Baseline discounts. This
9 reduction would result in about a 21% increase in customer bills by the end of this
10 GRC cycle. The City opposes this change because SDG&E failed to demonstrate
11 that the proposal is cost-based. If the Commission decides to adopt a change in
12 SDG&E's Medical Baseline discount, this should be phased in over at least two
13 GRC cycles.

14

15 Each of these recommendations are discussed in more detail below.

16

17 **II. SDG&E's Proposed Split of the Customers Taking**
18 **Service On AL-TOU is Arbitrary and Unsupported**

19

20 **Q. What is the purpose of this section of your testimony?**

21 A. This section of my testimony addresses SDG&E's proposal to split the Medium/Large-
22 Commercial/Industrial (M/L-C/I) class taking service under Schedule AL-TOU into two
23 parts.

24

25 **A. SDG&E's Current Tariff Structure**

26 **Q. Please describe which non-residential customers are eligible to take service under**
27 **SDG&E's Schedule AL-TOU?**

28 A. SDG&E's Schedule AL-TOU is currently open to all customers with maximum demands
29 of 20 kW or more. This is a much wider range of customers than either SCE or PG&E
30 have in their M/L-C/I default tariff(s).

1 **Q. Has the City previously advocated for potentially splitting the AL-TOU class?**
2 A. Yes. In SDG&E’s last GRC Phase 2 proceeding, the City recommended studying such a
3 split.⁴ In its recommendation, the City did not present a specific dividing line for the split.
4

5 **Q. Did other parties also recommend a split in the M/L-C&I class in the last GRC
6 Phase 2?**

7 A. Yes. Cal Advocates also recommended splitting the class and advocated for a split at 100
8 kW.⁵
9

10 **Q. How did SDG&E respond to this suggestion?**

11 A. In the settlement of issues related to M/L-C/I customers, SDG&E agreed to study such a
12 split. The settlement did not specify precisely how the study was to be performed, the
13 options SDG&E would examine for splitting the class, or the type of information to be
14 provided to support the study.⁶ However, the settlement did specify that a study was to be
15 performed.
16

17 **Q. What did SDG&E provide for its “study” of splitting the M/L-C/I class?**

18 A. SDG&E unilaterally decided to split the class at 200 kW. SDG&E provided its “study”
19 results at a workshop on November 10, 2022.⁷ The study results and workshop materials
20 did not present bill impacts associated with splitting the tariff. The study did not examine
21 alternative splits (e.g., at 50 kW, 100 kW, 500 kW any other split).
22

23 **Q. What did SDG&E propose in this proceeding related to splitting the M/L-C/I class?**

24 A. SDG&E proposed to split the class at 200 kW.
25

⁴ “Direct Testimony of William A. Monsen on Behalf of the City of San Diego Regarding Marginal Costs, Revenue Allocation, and Rate Design in Applications 10-07-009 and 19-03-002,” April 6, 2020 (Monsen Prior Testimony), pp. 9-15 (see Appendix WAM-3).

⁵ Monsen Prior Testimony, p. 15.

⁶ D.21-07-010, Appendix B, Section 2.2.3.1 at 8.

⁷ “SDG&E 2024 GRC Phase 2 Workshop on M/L Commercial Class Split Study,” November 10, 2022 (Split Study) (see Appendix WAM-3),

1 **Q. How did SDG&E justify this proposed split in this proceeding?**

2 A. SDG&E states that it selected this split because other utilities have used 200 kW and
3 because there would be a good number of customers in each new class.⁸

5 **Q. Did SDG&E provide bill impacts showing how customers would be affected by its
6 proposed split?**

7 A. No. SDG&E's application workpapers and its November 10, 2022 workshop literature
8 did not provide any bill impacts associated with this proposal (or alternate split points). In
9 addition, when the City asked for all workpapers supporting its split study, no bill
10 impacts were provided.⁹

12 **Q. Has SDG&E since provided bill impacts associated with its proposed split on all
13 customers?**

14 A. No. The City submitted data requests asking for such bill impacts resulting from
15 SDG&E's proposal for City accounts so that the City would know how the proposed split
16 would impact its bills. Unfortunately, after agreeing to do such analysis, it took SDG&E
17 several months to finally provide the bill impacts associated with the split for the City's
18 accounts. As far as I know, SDG&E has not provided bill impacts for all customers
19 affected by the proposed split.

20 **B. Concerns Related to SDG&E's Proposal**

22 **Q. What concern does the City have with SDG&E's proposal to split the M/L-C/I class
23 at 200 kW?**

24 A. SDG&E's proposal is unsupported. It is unclear if 200 kW is the most appropriate split of
25 the M/L-C/I class or if another split point would have less deleterious impacts on
26 customers on either side of the divide since SDG&E failed to analyze any alternative
27 splits or provide bill impacts for its proposal. Thus, it is not clear if SDG&E's proposal is
28 the least-cost approach for customers, whether the bill impacts associated with the split
29 are reasonable, or if the proposal could unduly punish certain customers.

⁸ SDG&E Updated Testimony, Chapter 3, p. 20.

⁹ SDG&E Response to City of San Diego Data Request 1, Question 10 (see Appendix WAM-2)

1
2 **Q. Has SDG&E demonstrated that its proposed split of the M/L-C/I class is cost-
3 based?**

4 A. I was unable to find any such claims by SDG&E in its testimony.
5

6 **Q. What does this mean?**

7 A. SDG&E's proposal regarding splitting the M/L-C/I class at 200 kW violates one of the
8 Commission's updated Rate Design Principles that SDG&E points to in its updated
9 testimony.
10

11 **Q. Why do you say that SDG&E's proposal violates a Rate Design Principles?**

12 A. SDG&E's proposal violates the Rate Design Principle that states:

13 Transitions to new rate structures should (i) include customer education and
14 outreach that enhances customer understanding and acceptance of new rates, and
15 (ii) minimize or appropriately consider the bill impacts associated with such
16 transitions.¹⁰
17

18 Clearly, SDG&E has failed to comply with this Rate Design Principle since it did not
19 consider in any way bill impacts associated with its proposed rate design change.

20 **C. City's Proposal**
21

22 **Q. What do you propose regarding the splitting of the M/L-C/I class?**

23 A. The City recognizes that the current range of customers taking service under Schedule
24 AL-TOU is too broad, which was why it advocated for a split in SDG&E's last GRC
25 Phase 2. However, the City is very concerned about the lack of rigor supporting
26 SDG&E's proposal in this proceeding. The City believes that a careful examination of
27 splitting the M/L-C/I class is still warranted. SDG&E has failed to provide such an
28 assessment in this proceeding, despite the fact that it agreed to study a split in the prior
29 Phase 2 proceeding.
30

31 For these reasons, the City has two recommendations. First, the City recommends that the

¹⁰ SDG&E Updated Testimony, Chapter 1, p. SP-7 (emphasis added).

1 Commission adopt on an interim basis SDG&E's proposed split in Schedule AL-TOU.
2 Second, the City recommends that SDG&E be ordered to work collaboratively with
3 parties to design a study and analysis of the impacts of splitting the M/L-C/I class, to
4 provide draft bill impacts and other results to parties to receive feedback and comment on
5 the interim results, and to present the results of the study (including bill impacts) in the
6 next possible rate setting proceeding (e.g., next GRC Phase 2, next Rate Design Window,
7 or possibly a separate application) with a proposed change in rate design.

8

9 **Q. Why do you propose this approach?**

10 A. The City agrees that some sort of split of the AL-TOU class is needed. However,
11 SDG&E has presented no evidence that its proposal is the appropriate split for this class.
12 Thus, the City supports moving ahead with a split on an interim basis while SDG&E
13 performs a study that allows the Commission and parties to evaluate the impacts of
14 splitting the class.

15

16 **Q. Do you have any recommendations regarding the types of splits that should be
17 examined in the study you propose?**

18 A. Yes. At a minimum, SDG&E should study splits at 50 kW, 100 kW, 200 kW, and 500
19 kW. SDG&E should use consistent assumptions when studying each case.

20

21 **Q. Do you have any other recommendation?**

22 A. Yes. The City recommends that SDG&E provide bill protection to customers that are
23 affected by the interim split. The bill protection would compare customers' bills against
24 bills assuming no split in the M/L-C/I class. This bill protection should be in effect until
25 such time as SDG&E provides the results of a more complete analysis of splitting the
26 M/L-C&I class to the Commission, parties are able to review and comment on the
27 analysis, and the Commission adopts a final split for the M/L-C/I class.

1

2 **III. SDG&E Opposes Simplification of Tariffs To the** 3 **Detriment of Its Customers**

4

5 **Q. What is the purpose of this section of your testimony?**

6 A. This section of my testimony addresses SDG&E's efforts to avoid simplifying its tariffs
7 as it implied it would in the settlement of its last Phase 2 GRC.¹¹ The instant proceeding
8 was to be the first step in such a simplification process. However, rather than making a
9 good-faith effort to simplify its tariffs to the benefit of its customers, SDG&E puts forth
10 misleading arguments to try to retain its unwieldy and atypical tariff structure.

11 **A. SDG&E's Current Tariff Structure**

12 **Q. What is SDG&E's current tariff structure?**

13 A. At the present time, SDG&E has two broad categories of electric tariffs: (1) commodity
14 tariffs and (2) distribution tariffs.¹² The following table presents the list of SDG&E's
15 current electric tariffs that are applicable to Commercial/Industrial, Streetlighting and
16 Agricultural customers:

17 **Table 1: Relationship Between SDG&E's Distribution and Commodity Tariffs**

Customer Class	Distribution Tariff	Commodity Tariff
Commercial/Industrial	Schedule TOU-A	Schedule EECC (or optionally EECC-TOU-A-P)
	Schedule TOU-A2	Schedule EECC (or optionally EECC-TOU-A-P)
	Schedule TOU-A3	Schedule EECC (or optionally EECC-TOU-A-P)
	Schedule A-TC	Schedule EECC
	Schedule TOU-M	Schedule EECC-CPP-D (monthly maximum demand not less than 20 kW for 3 consecutive months) Schedule EECC-CPP-D (optionally if monthly maximum demand less than 20 kW for 3 consecutive months)*
	Schedule AL-TOU	Schedule EECC-CPP-D (monthly maximum demand not less than 20 kW for 3 consecutive months) Schedule EECC-CPP-D (optionally if monthly maximum demand less than 20 kW for 3 consecutive months)*

11 D.21-07-010 Appendix B Section 2.2.18.

12 SDG&E has many tariffs other than just the commodity and distribution tariffs discussed in
this testimony. However, to simplify the presentation, my testimony only discusses that
interaction of the commodity and distribution tariffs. The summary of interaction between Utility
Distribution Company and Commodity rates presented in Table 1 was derived based on a review
of those tariffs. See <https://www.sdge.com/rates-and-regulations/current-and-effective-tariffs>

	Schedule AL-TOU2	Schedule EECC or Schedule EECC-CPP-D (optionally)
	Schedule A6-TOU	Schedule EECC-CPP-D
	Schedule DG-R	Schedule EECC-CPP-D (monthly maximum demand not less than 20 kW for 3 consecutive months) Schedule EECC-CPP-D (optionally if monthly maximum demand less than 20 kW for 3 consecutive months)*
	Schedule OL-TOU	Schedule EECC-CPP-D (monthly maximum demand not less than 20 kW for 3 consecutive months) Schedule EECC-CPP-D (optionally if monthly maximum demand less than 20 kW for 3 consecutive months)*
	Schedule EV-HP	Schedule EECC
Streetlighting	Schedule LS-1	Schedule EECC
	Schedule LS-2	Schedule EECC
	Schedule LS-2 DS	Schedule EECC
	Schedule LS-2 AD	Schedule EECC
	Schedule LS-3	Schedule EECC
	Schedule OL-1	Schedule EECC
	Schedule OL-2	Schedule EECC
	Schedule DWL	Schedule EECC
Agricultural	Schedule TOU-PA	Schedule EECC Schedule EECC-TOU-PA-P (optional)
	Schedule TOU-PA2	Schedule EECC Schedule EECC-TOU-CPP-D-AG (optional)
	Schedule TOU-PA3	Schedule EECC (below 200 kW) Schedule EECC-CPP-D-AG (equal to or above 200 kW)
	Schedule TOU-PA-T-1	Schedule EECC (below 200 kW)** Schedule EECC-CPP-D-AG (above 200 kW)

* Customer can also take commodity service under Schedule EECC-TOU-P but then must take UDC service is under Schedule TOU-A.

** If Monthly Max Demand is less than 20 kW, Customer can also take commodity service under Schedule EECC-TOU-PA-P but then must take UDC service under Schedule TOU-PA.

As can be seen from the above table, all non-residential customers must refer to two or more tariff sheets to understand the rates that they are charged for service from SDG&E.

Q. Do other IOUs use a tariff structure similar to SDG&E's?

A. No. Both PG&E and SCE present all of the typical rates for each account in a single tariff.

Q. What do you mean by "typical rates?"

A. Typical rates in this case means monthly customer charges, rates for wires service, and rates for commodity service.

B. SDG&E's Proposal in This Proceeding Tries to Circumvent the Process Established in the Settlement in the Last Phase 2 Proceeding

Q. Did the City raise this issue in the last Phase 2 proceeding?

A. Yes.¹³ In the last Phase 2 proceeding, I advocated for simplifying SDG&E's tariffs to make them more similar in structure to the other IOUs. My primary proposal related to this issue was to consolidate SDG&E's commodity tariffs with its UDC tariffs for individual rate options. This would allow most customers to only review a single tariff in order to understand the terms, conditions, and charges it was being assessed by SDG&E. This is precisely the tariff structure that both PG&E and SCE use.

Q. What was the outcome from the last GRC related to tariff simplification?

A. As part of a Commission-approved settlement of issues related to M/L-C/I issues, SDG&E agreed to present illustrative tariff examples for each rate class showing a new simplified tariff structure.¹⁴

Q. Did SDG&E present such examples in this proceeding?

A. Yes. SDG&E presented illustrative tariffs for Residential, Small Commercial, Commerical/Industrial, and Agricultural classes.¹⁵

Q. Does SDG&E support modifying its tariffs to include both the commodity and UDC components in a single combined tariff for each rate option?

A. No. SDG&E proposes that its “Total Electric Rates website,” which presents total electric rates by tariff, is a better option than tariff consolidation.¹⁶

Q. Does the “Total Electric Rates website present the special terms and conditions associated with each UDC or commodity tariff?

A. No.

¹³ Prior Monsen Testimony, pp. 6-9 (see Appendix WAM-3).

¹⁴ D.21-07-010, Appendix B, Section 2.2.18.1 at 17.

¹⁵ SDG&E Updated Testimony, Chapter 8, Attachment B.

¹⁶ SDG&E Updated Testimony, Chapter 8, p. EL-4.

1
2 **Q. Did SDG&E contact other parties to the prior settlement regarding its plan to not**
3 **support simplifying its tariffs in this proceeding?**

4 A. No. SDG&E unilaterally decided that it would present the illustrative tariffs but would
5 resist consolidation of commodity and UDC tariffs.

6
7 **Q. How did SDG&E justify its decision to oppose combining the UDC and commodity**
8 **tariffs into a single tariff?**

9 A. SDG&E claims that by consolidating the UDC and commodity tariffs into a single tariff
10 for each rate option would, among other things, “significantly increas[e] the number of
11 tables and pages in each tariff.”¹⁷ For example, SDG&E states that Schedule AL-TOU
12 would go from 13 to 23 sheets and Schedule TOU-PA would go from 8 to 12 sheets.¹⁸

13
14 **Q. Do you agree with SDG&E’s concern?**

15 A. No.

16
17 **Q. Why?**

18 A. When SDG&E presents the page counts for its existing tariffs, it did not include the
19 number of sheets in its commodity tariffs or just its UDC tariffs. Instead, SDG&E only
20 provides the number of sheets in its UDC tariffs in its comparisons and ignores the
21 number of sheets in its commodity tariffs.

22
23 **Q. Is this an important omission?**

24 A. Yes. The following table summarizes the number of sheets in the UDC plus relevant
25 commodity tariffs for the four illustrative tariffs that SDG&E included in Attachment B
26 to its testimony:

¹⁷ SDG&E Updated Testimony, Chapter 8, p. EL-4.

¹⁸ SDG&E Updated Testimony, Chapter 8, p. EL-4.

Table 2: SDG&E Understates Page Counts for Current Tariffs

	Medium/Large C&I	Residential	Small Commercial	Agricultural
UDC Tariff	AL-TOU (13 pages)	TOU-DR1 (8 pages)	TOU-A (6 pages)	TOU-PA (8 pages)
1 st Commodity Tariff	EECC-CPP-D (12 pages)	n/a	EECC-TOU-A-P (8 pages)	EECC (23 pages)
Total Pages in UDC + Commodity Tariffs	25 pages	8 pages	14 pages	31 pages
Total Pages in Illustrative Tariff	23 pages	8 pages	9 pages	12 pages
Current Total – Illustrative Total	2	0	5	19

3 Sources: SDG&E Online Tariffs (referenced 12/14/2023)
4

5 **Q. What does the above table show?**

6 A. The above table compares the number of sheets in SDG&E’s existing tariffs (where UDC
7 and commodity tariffs are separated) as well as the number of sheets in SDG&E’s
8 illustrative tariffs. From the above table, it is clear that SDG&E’s testimony is
9 misleading. Its claim that the combined tariff would result in more pages is false as, in all
10 cases, the illustrative tariffs have the same or fewer pages than the relevant existing tariff
11 sheets combined.¹⁹ Thus, SDG&E’s rationale for not combining the UDC and commodity
12 tariffs is incorrect and should be given no weight.

13
14 **Q. Why is the City still concerned with the structure of SDG&E’s tariffs when a
15 majority of SDG&E’s customers now take commodity service from CCAs?**

16 A. Under SDG&E’s current tariff structure, the UDC tariffs do not present potential exit fees
17 (“Cost Responsibility Surcharge,” or “CRS”) that CCA and other departing load
18 customers have to pay; those charges are presented in yet another SDG&E tariff
19 (Schedule CCA-CRS). Under the current rate structure, departing load customers, which
20 are now over 50% of SDG&E’s customers, will have to refer to at least five separate

¹⁹ The tariff that SDG&E chose to include as its illustrative tariff for the residential class already includes both UDC and commodity rates, meaning that it by definition has the same number of pages as the existing tariffs. All other illustrative combined tariffs have fewer sheets than the existing tariffs.

1 tariffs to be able to analyze their bills: (1) the UDC tariff, (2) the Commodity tariff, (3)
2 the CRS tariff, (4) the DWR Bond Charge tariff, and (5) the Wildfire Fund Non-
3 Bypassable Charge. Reducing the number of tariffs a customer must consider would
4 simplify the customer experience.

5

6 **Q. Why do CCA customers have to refer to the Commodity tariff?**

7 A. Despite the fact that the CCA will be providing commodity service to its customers,
8 SDG&E's UDC tariff explicitly states that:

9 The bills for a DA and CCA Customer will be calculated as if they were a UDC
10 Bundled Service Customer, then crediting the bill by the amount of the EECC
11 component, as determined for a UDC Bundled Customer, and including the
12 appropriate Cost Responsibility Surcharge (CRS) if applicable.²⁰

13

14 What this means is that SDG&E will calculate the bill for the CCA as if it were a bundled
15 service customer and then credit the amount from SDG&E's Commodity tariff to the
16 customer to calculate the UDC charges (i.e., the SDG&E commodity cost is included in
17 charges presented on the bills, then it is immediately taken out as a credit.) Thus, if a
18 customer wanted to replicate SDG&E's bill calculation, the customer would have to
19 examine SDG&E's Commodity tariff.

20

21 **Q. Why do customers have to refer to the DWR Bond Charge tariff and the Wildfire
22 Fund Non-Bypassable Charge tariff?**

23 A. These are the bases of other charges that customers pay. For example, SDG&E's
24 Schedule PA-T-1, which is a UDC tariff for agricultural pumping states:

25 Utility Distribution Company (UDC) Total Rate shown above excludes any
26 applicable commodity charges associated with Schedule EECC, Schedule WF-
27 NBC (Wildfire Fund Non-Bypassable Charge) and Schedule DWR-BC
28 (Department of Water Resources Bond Charge).²¹

29

30 From this it is clear that all customers must understand the charges under Schedules WF-

²⁰ Schedule AL-TOU, Sheet 8, Special Condition 14, effective December 17, 2017 (see Appendix WAM-3).

²¹ Schedule PA-T-1, Sheet 4, referenced January 6, 2024 (see Appendix WAM-3).

1 NBC and DWR-BC in order to be able to fully understand their bills.²²

2 **C. Proposal: Order SDG&E to Simplify its Tariffs**

3 **Q. What do you recommend?**

4 A. The Commission should order SDG&E to restructure its tariffs to be more comparable to
5 the tariffs of the other large electric utilities.

6

7 **Q. How should SDG&E restructure its tariffs?**

8 A. SDG&E should restructure its tariffs to consolidate all UDC and commodity charges for
9 a single rate option into a single tariff.

10

11 **Q. Why should the Commission order SDG&E to take this step?**

12 A. Tariffs are complicated. However, SDG&E's tariff structure only compounds the
13 complication faced by customers when they try to understand the charges on their bills.
14 Customers should be able to find their rates, terms, and conditions in a single tariff
15 (excluding special circumstances such as Net Energy Metering) and not have to hunt
16 around to multiple tariffs in order to understand the charges on their bills.

17

18 **Q. Over what period should SDG&E revise its tariffs?**

19 A. SDG&E should update its tariffs in compliance within sixty days of the effective date of
20 the decision in this proceeding.

21

22 **Q. Wouldn't your recommendation require SDG&E to establish a number of new
23 tariffs?**

24 A. No. Customers identify themselves with their UDC tariffs. SDG&E should simply
25 expand the information presented in the current UDC tariffs to provide customers with all
26 of the rates that customers would face. It should also be noted that by consolidating its
27 commodity tariffs into the tariffs that currently only provide information about
28 distribution rates, SDG&E's tariff book would be simplified because there would no

22 Currently, the charge under Schedule DWR-BC is zero.

1 longer be a need for SDG&E's commodity tariffs. Thus, my recommendation would
2 result in a significant simplification for customers.

3

4 **Q. Do you have other recommendations regarding simplification of billing?**

5 A. Yes. As discussed in the next section, SDG&E should do away with the practice of (1)
6 including SDG&E Commodity charges within bills of CCA and direct access customers
7 and then (2) subtracting exactly the same amount in bill presentation. This bill structure is
8 extremely confusing, difficult, and time consuming for customers, and it could effectively
9 prevent a majority of SDG&E's customers from easily understanding their bills.

10

11 **IV. SDG&E Should Simplify the Manner in Which it Presents**
12 **Bills to Non-Bundled Service Customers**

13

14 **Q. What is the purpose of this section of your testimony?**

15 A. This section of my testimony addresses SDG&E's clumsy method for presenting charges
16 to non-bundled service customers on their bills. SDG&E's approach is convoluted and
17 differs from the approach used by the other IOUs.

18 **A. SDG&E's Current Bill Presentation Approach for Non-Bundled**
19 **Service Customers is Non-Standard**

20

21 **Q. What charges does a non-bundled service electric customer pay monthly?**

22 A. Non-bundled service customers pay (1) UDC charges (including non-bypassable charges
23 and any exit fees) to SDG&E and (2) commodity charges to their commodity provider.
24 SDG&E presents a bill to the customer that collects charges for both entities.

25

26 **Q. How does SDG&E present its UDC charges to non-bundled service customers?**

27 A. SDG&E calculates and shows the total charges that a bundled service customer would
28 pay to SDG&E (which includes line items for (1) UDC service and (2) commodity
29 service) and it then shows a line item that subtracts the SDG&E commodity charges that
30 are part of the total charges, thereby arriving at the UDC charges that the non-bundled
31 service customer owes SDG&E. This approach is spelled out in SDG&E's UDC tariffs:

The bills for a DA and CCA Customer will be calculated as if they were a UDC Bundled Service Customer, then crediting the bill by the amount of the EECC component, as determined for a UDC Bundled Customer, and including the appropriate Cost Responsibility Surcharge (CRS) if applicable.²³

Q. Is this how other utilities present their UDC charges to their customers?

A. No.

Q. Can you provide examples of how SDG&E's bills differ from the bills of another utility??

A. Yes. Appendix WAM-3 presents a redacted copy of a portion of a PG&E bill and a redacted copy of a bill for an SDG&E customer. Both customers take service from CCAs. As can be seen from the redacted bills presented in Appendix WAM-3, the SDG&E bill shows the addition of the generation cost and the immediate subtraction of the same generation cost.²⁴ The PG&E bill does not do this: instead, the PG&E bill presents the total cost under the customer’s bundled service tariff and then subtracts the generation costs. The PG&E approach is simpler and less confusing than that used by SDG&E.

B. SDG&E Should Simplify its Bill Presentation to Non-Bundled Service Customers

Q. What do you recommend?

A. As with SDG&E's overly-complex tariff structure discussed above that differs from the other IOUs, SDG&E's bill presentation approach is also confusing. For that reason, I recommend that SDG&E revise the manner in which it presents bills to its non-bundled service customers.

Q. How should the bill be structured for these customers?

A. There should be a one-to-one correspondence between the charges that customers incur and the portion of the bill in which those charges are presented. At the very least,

²³ Schedule AL-TOU, Sheet 8, Special Condition 14, effective December 17, 2017 (see Exhibit WAM-2).

²⁴ It should be noted that SDG&E's bill structure is a direct result of its overly complex tariff structure.

1 SDG&E should NOT present bills to non-bundled service customers that show bundled
2 service charges that are not applicable to the customer. This causes customer confusion
3 and likely triggers customer service calls to both SDG&E and to the customer's
4 commodity service provider.

5

6 **Q. What should be the process for restructuring the bills to non-bundled service**
7 **customers?**

8 A. The Commission should establish a working group consisting of representatives from
9 SDG&E, customers, and third-party commodity providers (including SDCP) to work
10 through the format of the bills. This working group should be established 30 days after
11 the effective date of the final decision in this proceeding.

12

13 **V. The Commission Should Adopt SDG&E's Proposal** 14 **Related to Timing of Filings for CPP Event Hours with Slight** 15 **Modifications**

16

17 **Q. What is the purpose of this section of your testimony?**

18 A. This section of my testimony addresses SDG&E's proposal to "align" CPP and TOU
19 periods.

20 **A. SDG&E's Proposal**

21

22 **Q. What has SDG&E proposed regarding its efforts to align its CPP and TOU periods?**

23 A. SDG&E is currently required to make an annual filing that updates its CPP event period
24 based on a loss of load analysis. It has previously changed CPP periods to align with its
25 peak TOU period. However, SDG&E does not believe it would ever make a change to its
26 CPP event periods outside of a change to its base TOU periods. Thus, SDG&E requests
27 permission to change the annual compliance filing requirement and annual requirement to
28 evaluate the CPP event period to instead be performed only during GRC Phase 2
29 proceedings.²⁵

²⁵ SDG&E Updated Testimony, Chapter 1, pp. SP-24 to SP-25.

1 **B. City Response to SDG&E's Proposal**

2

3 **Q. How does the City respond to SDG&E's proposal to only present studies of changes**
4 **to its CPP event periods in GRC Phase 2 proceedings?**

5 A. The City is sympathetic with SDG&E's concern about needing to make annual filings to
6 examine CPP periods when it seems unlikely that SDG&E would change the CPP event
7 periods outside of a GRC Phase 2 or a Rate Design Window proceeding. The City does
8 not support requiring SDG&E to perform work that has no value.

9

10 On the other hand, the City is concerned that SDG&E may be underestimating the need
11 for adjustments to its CPP event periods. For example, in this proceeding, SDG&E
12 indicated that it expects significant changes in commodity energy prices (i.e., DLAP
13 prices) over the next few years.²⁶ It appears that SDG&E anticipates both changes in the
14 relative difference between on- and off-peak prices as well as a shift in the hours of
15 system peak prices. The very dramatic changes in prices that SDG&E anticipates might
16 also have an impact on the need for adjustments in the timing of CPP events.

17

18 **Q. What do you recommend?**

19 A. SDG&E expects major changes in commodity prices over this GRC cycle. For that
20 reason, SDG&E's proposal to move from an annual filing requirement to a filing every
21 four to five years is premature. For that reason, the City proposes changing the CPP-
22 related advice letter filing requirement from an annual filing to one that is done every two
23 years. This would ensure that SDG&E is keeping track of whether its CPP event hours
24 are drifting away from hours of greatest need or its TOU periods. Also, this somewhat
25 longer filing cycle would reduce the burden on SDG&E related to these filings. Finally, it
26 would also position SDG&E well in case a change was needed between GRC Phase 2
27 proceedings (e.g., in a Rate Design Window proceeding).

²⁶ SDG&E Updated Testimony, Chapter 1, pp. SP-20 to SP-22.

1

2 VI. SDG&E's Proposal to Extend Weekday Midday Super- 3 Off-Peak Hours to All Months is Reasonable but Needs 4 Clarification

5

6 **Q. What is the purpose of this section of your testimony?**

7 A. This section of my testimony discusses SDG&E's proposal to expand its super-off-peak
8 period to include certain hours on weekdays for all months of the year.

9 **A. SDG&E's Proposal**

10 **Q. What are SDG&E's current base TOU periods?**

11 A. SDG&E's base TOU periods are as follows:

12 **Figure 1: TOU Periods for AL-TOU**

TOU Period – Weekdays	Summer	Winter
On-Peak	4:00 p.m. – 9:00 p.m.	4:00 p.m. – 9:00 p.m.
Off-Peak	6:00 a.m. – 4:00 p.m.; 9:00 p.m. – midnight	6:00 a.m. – 4:00 p.m. Excluding 10:00 a.m.–2:00 p.m. in March and April; 9:00 p.m. - midnight
Super-Off-Peak	Midnight – 6:00 a.m. 10:00 a.m. – 2:00 p.m. in March and April	Midnight – 6:00 a.m. 10:00 a.m. – 2:00 p.m. in March and April

TOU Period – Weekends and Holidays	Summer	Winter
On-Peak	4:00 p.m. – 9:00 p.m.	4:00 p.m. – 9:00 p.m.
Off-Peak	2:00 p.m. – 4:00 p.m.; 9:00 p.m. – midnight	2:00 p.m. – 4:00 p.m. 9:00 p.m. - midnight
Super-Off-Peak	Midnight – 2:00 p.m.	Midnight – 2:00 p.m.

Seasons:

Summer June 1 – October 31
Winter November 1 – May 31

13 Source: Schedule AL-TOU, Downloaded on November 21, 2023.

14 As can be seen from the above figure,²⁷ SDG&E's current Super-Off-Peak TOU period

15
16
17 ²⁷ In this testimony, I present tables that have been extracted from SDG&E's testimony as figures.

1 on Winter weekdays (daytime, post- 6:00 a.m.) includes the hours from 10 a.m. – 2 p.m.
2 only during the months of March and April. For the rest of the year, there is no Super-
3 Off-Peak hours from 10 a.m. to 2 p.m. on weekdays.

4

5 **Q. What is SDG&E proposing in this proceeding with respect to its Super-Off-Peak**
6 **TOU period?**

7 A. SDG&E is proposing to include the hours from 10 a.m. to 2 p.m. on all weekdays in its
8 super-off-peak TOU period for all months of the year.²⁸ This would make all weekdays
9 the same throughout the year. The following figure presents SDG&E's proposal:

10

11 **Figure 2: SDG&E's Proposed Base TOU Periods**

TOU Period	Weekday		Weekend	
	Summer	Winter	Summer	Winter
On-Peak	4 – 9 PM	4 – 9 PM	4 – 9 PM	4 – 9 PM
Off-Peak	All other hours	All other hours	All other hours	All other hours
Super Off-Peak	Midnight – 6 AM; 10 AM – 2 PM	Midnight – 6 AM; 10 AM – 2 PM	Midnight – 2 PM	Midnight – 2 PM

12

13 Source: SDG&E Updated Testimony, Chapter 1, p. SP-13.

14

15 **B. City's Response to SDG&E's Proposed TOU Periods**

16 **Q. How does the City respond to SDG&E's proposed addition of the hours of 10 a.m. –**

17 **2 p.m. to the super-off-peak hours on all weekdays?**

18 A. The City supports this change. This should simplify TOU rates for customers by having
19 consistent hours for all weekday TOU periods in all months of the year. This change also
20 appears to be supported by SDG&E's marginal energy cost analysis.

21

22 **Q. Does the City have any concerns about the proposal?**

23 A. Yes. It is unclear from SDG&E's testimony how these revised base TOU periods will
24 affect the TOU periods for electric vehicle charging rates. The City asked SDG&E in a
25 data request to clarify this matter by stating which tariffs this proposal would apply to,

²⁸ SDG&E Revised Testimony, Chapter 1, p. SP-13 to SP-14.

1 SDG&E gave a vague and unresponsive answer.²⁹
2

3 **Q. What do you recommend?**

4 A. SDG&E should supplement its filing to clarify how these proposed changes in its base
5 TOU periods will affect the TOU periods in all of its tariffs by specifically identifying all
6 tariffs for which this change would apply, how the change would be implemented, and
7 also identifying how rates with non-standard TOU periods would be affected with the
8 application of this change. This is especially true for Schedule EV-HP or other EV-
9 charging related tariffs.

10
11 **VII. SDG&E's Proposal to Modify Its Medical Baseline
12 Discount is Unsupported and Should Be Rejected**
13

14 **Q. What is the purpose of this section of your testimony?**

15 A. This section of my testimony discusses SDG&E's proposal to modify its medical baseline
16 program.

17 **A. SDG&E's Proposal**
18

19 **Q. What is SDG&E proposing regarding its medical baseline program?**

20 A. SDG&E is proposing two changes to its medical baseline program. First, SDG&E is
21 proposing to providing a line-item Medical Baseline discount instead of discounted
22 Medical Baseline rates it currently offers. Second, SDG&E is proposing a significant
23 reduction in the medical baseline discount over this GRC cycle.

24
25 **Q. How is SDG&E proposing to reduce its medical baseline discount?**

26 A. The following figure from SDG&E's testimony summarizes the proposed change:

²⁹ SDG&E Response to City of San Diego Data Request 3, Question 3 (see Appendix WAM-2)

1
2 **Figure 3: SDG&E's Proposed Transition for Medical Baseline Discount**

3
4 **Figure RD-4: Proposed Medical Baseline Discount Percentages**

Medical Baseline Discount Percentages				
1/1/2023 Rate Discount (%)	Proposed Year 1 (%)	Proposed Year 2 (%)	Proposed Year 3 (%)	Proposed Year 4 (%)
25.69	22.27	18.85	15.42	12.00

5
6 Source: SDG&E Updated Testimony, Chapter 3, p. 10.
7

8 **Q. How does SDG&E justify its proposed change in the medical baseline discount
9 percentage?**

10 A. SDG&E simply states that its discount percentage is greater than that offered by PG&E
11 and SCE and, as a result, should be reduced.³⁰

12 **Q. Has SDG&E provided any analysis showing that its current medical baseline
13 discount is unjust and unreasonable?**

14 A. No. The City specifically asked for such evidence but SDG&E was unwilling to provide
15 it.³¹

16 **Q. What would be the bill impacts on medical baseline customers as a result of
17 SDG&E's proposal?**

18 A. As far as I know, SDG&E provided a very limited set of bill impacts resulting from its
19 proposal. SDG&E estimates that the annual percentage change in bill for a medical
20 baseline customer that uses 600 kWh per month would be between 4.5% and 10% per
21 year (assuming no other changes in SDG&E rates). By the end of the third year of the
22 phase-in, medical baseline customers would see almost a 21% bill increase relative to
23 current rates.³² I have seen no other bill impacts for other customers (e.g., for customers
24 that use more or less energy on average than 600 kWh per month).

30 SDG&E Updated Testimony, p. 9.

31 SDG&E Response to City of San Diego Data Request 3, Question 4 (see Appendix WAM-2).

32 Derived from attachment to SDG&E Response to City of San Diego Data Request 3, Question 4c (see Appendix WAM-2).

B. City's Response to SDG&E's Proposed Decrease in Medical Baseline Discount

Q. How does the City respond to SDG&E's proposal to reduce the medical baseline discount?

A. The City opposes this proposal. SDG&E provides no basis to demonstrate that its current proposal is unjust or unreasonable. In addition, SDG&E provides no data demonstrating that its proposal to revise its baseline credit is cost-based (other than simply pointing to the medical baseline discounts for SCE and PG&E). For these reasons alone, the Commission should reject SDG&E's proposal because SDG&E has failed to meet its burden of proof.

It is notable that SDG&E, for this specific proposal, has decided that consistency with PG&E and SCE is an important part of its ratemaking. As noted elsewhere in this testimony, SDG&E has consistently had tariff structures that are far more complicated and difficult to use than either SCE or PG&E. In fact, SDG&E's testimony in this proceeding opposes revising its tariff structure to be consistent with PG&E or SCE.

Q. Do you have an alternate proposal if the Commission decides to adopt the reduction of SDG&E's medical baseline discount?

A. Yes. Because of the severe bill increases associated with SDG&E's proposal to move its medical baseline discount to 12%, the City recommends that this change, if approved, be phased in over a significantly longer timeframe than proposed by SDG&E (i.e., over at least two GRC cycles.) This would help mitigate the already significant rate increases that medical baseline customers are facing as a result of SDG&E's proposed changes in revenue requirements in Phase 1 of this GRC.

1

2 **VIII. Conclusion**

3

4 **Q. Does this conclude your opening testimony?**

A. Yes, unless additional errors are identified in SDG&E's showing as a result of further review and analysis.

APPENDIX WAM-1
RESUME FOR WILLIAM A. MONSEN

RESUME FOR WILLIAM ALAN MONSEN

PROFESSIONAL EXPERIENCE

Principal Consultant **MRW & Associates, LLC** **(1989 - Present)**

Specialist in electric utility generation planning, resource auctions, demand-side management policy, power market simulation, power project evaluation, and evaluation of customer energy cost control options. Typical assignments include: analysis, testimony preparation and strategy development in large, complex regulatory intervention efforts regarding the economic benefits of utility mergers and QF participation in California's biennial resource acquisition process, analysis of markets for non-utility generator power in the western US, China, and Korea, evaluate the cost-effectiveness of onsite power generation options, sponsor testimony regarding the value of a major new transmission project in California, analyze the value of incentives and regulatory mechanisms in encouraging utility-sponsored DSM, negotiating non-utility generator power sales contract terms with utilities, and utility ratemaking.

Energy Economist **Pacific Gas & Electric Company** **(1981 - 1989)**

Responsible for analysis of utility and non-utility investment opportunities using SDG&E's Strategic Analysis Model. Performed technical analysis supporting SDG&E's Long Term Planning efforts. Performed Monte Carlo analysis of electric supply and demand uncertainty to quantify the value of resource flexibility. Developed DSM forecasting models used for long-term planning studies. Created an engineering-econometric modeling system to estimate impacts of DSM programs. Responsible for SDG&E's initial efforts to quantify the benefits of DSM using production cost models.

Academic Staff **University of Wisconsin-Madison Solar Energy Laboratory** **(1980 - 1981)**

Developed simplified methods to analyze efficiency of passive solar energy systems. Performed computer simulation of passive solar energy systems as part of Department of Energy's System Simulation and Economic Analysis working group.

EDUCATION

M.S., Mechanical Engineering, University of Wisconsin-Madison, 1980.
B.S., Engineering Physics, University of California, Berkeley, 1977.

Prepared Testimony and Expert Reports

1. California Public Utilities Commission (CPUC) Applications 90-08-066, 90-08-067, 90-09-001
Prepared Testimony with Aldyn W. Hoekstra regarding the California-Oregon Transmission Project for Toward Utility Rate Normalization (TURN). November 29, 1990.
2. CPUC Application 90-10-003
Prepared Testimony with Mark A. Bachelis regarding the Value of Qualifying Facilities and the Determination of Avoided Costs for the San Diego Gas & Electric Company for the Kelco Division of Merck & Company, Inc. December 21, 1990.
3. California Energy Commission Docket No. 93-ER-94
Rebuttal Testimony regarding the Preparation of the 1994 Electricity Report for the Independent Energy Producers Association. December 10, 1993.
4. CPUC Rulemaking 94-04-031 and Investigation 94-04-032
Prepared Testimony Regarding Transition Costs for The Independent Energy Producers. December 5, 1994.
5. Massachusetts Department of Telecommunications and Energy DTE 97-120
Direct Testimony regarding Nuclear Cost Recovery for The Commonwealth of Massachusetts Division of Energy Resources. October 23, 1998.
6. CPUC Application 97-12-039
Prepared Direct Testimony Evaluating an Auction Proposal by SDG&E on Behalf of The California Cogeneration Council. June 15, 1999.
7. CPUC Application 99-09-053
Prepared Direct Testimony of William A. Monsen on Behalf of The Independent Energy Producers Association. March 2, 2000.
8. CPUC Application 99-09-053
Prepared Rebuttal Testimony of William A. Monsen on Behalf of the Independent Energy Producers Association. March 16, 2000.
9. CPUC Rulemaking 99-10-025
Joint Testimony Regarding Auxiliary Load Power and Stand-By Metering on Behalf of Duke Energy North America. July 3, 2000.
10. CPUC Application 99-03-014
Joint Testimony Regarding Auxiliary Load Power and Stand-By Metering on Behalf of Duke Energy North America. September 29, 2000.

11. CPUC Rulemaking 99-11-022
Testimony of the Independent Energy Producers Association Regarding Short-Run Avoided Costs. May 7, 2001.
12. CPUC Rulemaking 99-11-022
Rebuttal Testimony of the Independent Energy Producers Association Regarding Short-Run Avoided Costs. May 30, 2001.
13. CPUC Application 01-08-020
Direct Testimony on Behalf of Bear Mountain, Inc. in the Matter of Southern California Water Company's Application to Increase Rates for Electric Service in the Bear Valley Electric Customer Service Area. December 20, 2001.
14. CPUC Application 00-10-045; 01-01-044
Direct Testimony on Behalf of the City of San Diego. May 29, 2002.
15. CPUC Rulemaking 01-10-024
Prepared Direct Testimony on Behalf of Independent Energy Producers and Western Power Trading Forum. May 31, 2002.
16. CPUC Rulemaking 01-10-024
Rebuttal Testimony on Behalf of Independent Energy Producers and Western Power Trading Forum. June 5, 2002.
17. Arizona Corporation Commission Docket Numbers E-00000A-02-0051, E-01345A-01-0822, E-0000A-01-0630, E-01933A-98-0471, E01933A-02-0069
Rebuttal Testimony on Behalf of AES NewEnergy, Inc. and Strategic Energy L.L.C.: Track A Issues. June 11, 2002.
18. CPUC Application 00-11-038
Testimony on Behalf of the Alliance for Retail Energy Markets in the Bond Charge Phase of the Rate Stabilization Proceeding. July 17, 2002.
19. CPUC Rulemaking 01-10-024
Prepared Testimony in the Renewable Portfolio Standard Phase on Behalf of Center for Energy Efficiency and Renewable Technologies. April 1, 2003.
20. CPUC Rulemaking 01-10-024
Direct Testimony of William A. Monsen Regarding Long-Term Resource Planning Issues on Behalf of the City of San Diego. June 23, 2003.
21. CPUC Application 03-03-029
Testimony of William A. Monsen Regarding Auxiliary Load Power Metering Policy and Standby Rates on Behalf of Duke Energy North America. October 3, 2003.

22. CPUC Rulemaking 03-10-003
Opening Testimony of William A. Monsen Regarding Phase One Issues Related to Implementation of Community Choice Aggregation on Behalf of the Local Government Commission Coalition. April 15, 2004.
23. CPUC Rulemaking 03-10-003
Reply Testimony of William A. Monsen Regarding Phase One Issues Related to Implementation of Community Choice Aggregation on Behalf of Local Government Commission. May 7, 2004.
24. CPUC Rulemaking 04-04-003
Direct Testimony of William A. Monsen Regarding the 2004 Long-Term Resource Plan of San Diego Gas & Electric Company on Behalf of the City of San Diego. August 6, 2004.
25. Sonoma County Assessment Appeals Board
Expert Witness Report of William A. Monsen Regarding the Market Price of Electricity in the Matter of the Application for Reduction of Assessment of Geysers Power Company, LLC, Sonoma County Assessment Appeals Board, Application Nos.: 01/01-137 through 157. September 10, 2004.
26. Sonoma County Assessment Appeals Board
Presentation of Results from Expert Witness Report of William A. Monsen Regarding the Market Price of Electricity in the Matter of the Application for Reduction of Assessment of Geysers Power Company, LLC, Sonoma County Assessment Appeals Board, Application Nos.: 01/01-137 through 157. September 10, 2004.
27. Sonoma County Assessment Appeals Board
Presentation of Rebuttal Testimony and Results of William A. Monsen Regarding the Market Price of Electricity in the Matter of the Application for Reduction of Assessment of Geysers Power Company, LLC, Sonoma County Assessment Appeals Board, Application Nos.: 01/01-137 through 157. October 18, 2004.
28. CPUC Rulemaking 04-03-017
Testimony of William A. Monsen Regarding the Itron Report on Behalf of the City of San Diego. April 13, 2005.
29. CPUC Rulemaking 04-03-017
Rebuttal Testimony of William A. Monsen Regarding the Cost-Effectiveness of Distributed Energy Resources on Behalf of the City of San Diego. April 28, 2005.
30. CPUC Application 05-02-019
Testimony of William A. Monsen SDG&E's 2005 Rate Design Window Application on Behalf of the City of San Diego. June 24, 2005.

31. CPUC Rulemaking 04-01-025, Phase II
Direct Testimony of William A. Monsen on Behalf of Crystal Energy, LLC. July 18, 2005.
32. CPUC Application 04-12-004, Phase I
Direct Testimony of William A. Monsen on Behalf of Crystal Energy, LLC. July 29, 2005.
33. CPUC Application 04-12-004, Phase I
Rebuttal Testimony of William A. Monsen on Behalf of Crystal Energy, LLC. August 26, 2005.
34. CPUC Rulemakings 04-04-003 and 04-04-025
Prepared Testimony of William A. Monsen Regarding Avoided Costs on Behalf of the Independent Energy Producers. August 31, 2005.
35. CPUC Application 05-01-016 et al.
Prepared Testimony of William A. Monsen Regarding SDG&E's Critical Peak Pricing Proposal on Behalf of the City of San Diego. October 5, 2005.
36. CPUC Rulemakings 04-04-003 and 04-04-025
Prepared Rebuttal Testimony of William A. Monsen Regarding Avoided Costs on Behalf of the Independent Energy Producers. October 28, 2005.
37. Public Utilities Commission of the State of Colorado Docket No. 05A-543E
Answer Testimony of William A. Monsen on Behalf of AES Corporation and the Colorado Independent Energy Association. April 18, 2006.
38. CPUC Application 04-12-004
Prepared Testimony of William A. Monsen Regarding Firm Access Rights on Behalf of Clearwater Port, LLC. July 14, 2006.
39. CPUC Application 04-12-004
Prepared Rebuttal Testimony of William A. Monsen Regarding Firm Access Rights on Behalf of Clearwater Port, LLC. July 31, 2006.
40. Public Utilities Commission of Nevada Dockets 06-06051 and 06-07010
Testimony of William A. Monsen on Behalf of the Nevada Resort Association Regarding Integrated Resource Planning. September 13, 2006.
41. CPUC Application 07-01-047
Testimony of William A. Monsen on Behalf of the City of San Diego Concerning the Application of San Diego Gas & Electric Company for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. August 10, 2007.

42. Public Utilities Commission of the State of Colorado Docket No. 07A-447E
Answer Testimony of William A. Monsen on Behalf of the Colorado Independent Energy Association. April 28, 2008.

43. CPUC Application 08-02-001
Testimony of William A. Monsen On Behalf of the City of Long Beach Gas & Oil Department Concerning the Application of San Diego Gas & Electric Company and Southern California Gas Company for Authority to Revise Their Rates Effective January 1, 2009 In Their Biennial Cost Allocation Proceeding. June 18, 2008.

44. CPUC Application 08-02-001
Rebuttal Testimony of William A. Monsen On Behalf of the City of Long Beach Gas & Oil Department Concerning the Application of San Diego Gas & Electric Company and Southern California Gas Company for Authority to Revise Their Rates Effective January 1, 2009 In Their Biennial Cost Allocation Proceeding. July 10, 2008.

45. CPUC Application 08-06-001 et al.
Prepared Testimony of William A. Monsen On Behalf of the California Demand Response Coalition Concerning Demand Response Cost-Effectiveness and Baseline Issues. November 24, 2008.

46. CPUC Application 08-02-001
Testimony of William A. Monsen On Behalf of the City of Long Beach Gas & Oil Department Concerning Revenue Allocation and Rate Design Issues in The San Diego Gas & Electric Company and Southern California Gas Company Biennial Cost Allocation Proceeding. December 23, 2008.

47. CPUC Application 08-06-034
Testimony of William A. Monsen On Behalf of Snow Summit, Inc. Concerning Cost Allocation and Rate Design. January 9, 2009.

48. CPUC Application 08-02-001
Rebuttal Testimony of William A. Monsen on Behalf of the City of Long Beach Gas & Oil Department Concerning Revenue Allocation and Rate Design Issues in The San Diego Gas & Electric Company and Southern California Gas Company Biennial Cost Allocation Proceeding. January 27, 2009.

49. CPUC Application 08-11-014
Testimony of William A. Monsen on Behalf of the City of San Diego Concerning the Application of San Diego Gas & Electric Company for Authority to Update Cost Allocation and Electric Rate Design. April 17, 2009.

50. Public Utilities Commission of the State of Colorado Docket No. 09-AL-299E
Answer Testimony of William A. Monsen on Behalf of Copper Mountain, Inc. and Vail Summit Resorts, Inc. – Notice of Confidentiality: A Portion of Document Has Been Filed Under Seal. October 2, 2009.

51. Public Utilities Commission of the State of Colorado Docket No. 09-AL-299E
Supplemental Answer Testimony of William A. Monsen on Behalf of Copper Mountain, Inc. and Vail Summit Resorts, Inc. October 8, 2009.
52. Public Utilities Commission of the State of Colorado Docket No. 09AL-299E Surrebuttal Testimony of William A. Monsen on Behalf of Copper Mountain, Inc. and Vail Summit Resorts, Inc. December 18, 2009.
53. United States District Court for the District of Montana, Billings Division, Rocky Mountain Power, LLC v. Prolec GE, S De RL De CV Case No. CV-08-112-BLG-RFC, "Evaluation of Business Interruption Loss Associated with a Fault on December 15, 2007, of a Generator Step-Up (GSU) Transformer at the Hardin Generating Station, Located in Hardin, Montana," September 15, 2010.
54. United States District Court for the District of Montana, Billings Division, Rocky Mountain Power, LLC v. Prolec GE, S De RL De CV Case No. CV-08-112-BLG-RFC, "Supplemental Findings and Conclusions Regarding Evaluation of Business Interruption Loss Associated with a Fault on December 15, 2007, of a Generator Step-Up (GSU) Transformer at the Hardin Generating Station, Located in Hardin, Montana," November 2, 2010.
55. CPUC Application 10-05-006
Testimony of William Monsen on Behalf of the Independent Energy Producers Association in Track III of the Long-Term Procurement Planning Proceeding Concerning Bid Evaluation. August 4, 2011.
56. Public Utilities Commission of the State of Colorado Docket No. 11A-869E
Answer Testimony of William A. Monsen on Behalf of Colorado Independent Energy Association, Colorado Energy Consumers and Thermo Power & Electric LLC. June 4, 2012.
57. CPUC Application 11-10-002
Testimony of William A. Monsen on Behalf of the City of San Diego Concerning the Application of San Diego Gas & Electric Company for Authority to Update Marginal Costs, Cost Allocations, and Electric Rate Design. June 12, 2012.
58. Public Utilities Commission of the State of Colorado Docket No 11A-869E
Cross Answer Testimony of William A. Monsen on Behalf of Colorado Independent Energy Association, Colorado Energy Consumers and Thermo Power & Electric LLC. July 16, 2012.
59. CPUC Rulemaking 12-03-014
Reply Testimony of William A. Monsen on Behalf of the Independent Energy Producers Association Concerning Track One of the Long-Term Procurement Proceeding. July 23, 2012.

60. CPUC Application 12-03-026
Testimony of William A. Monsen on Behalf of the Independent Energy Producers Association concerning Pacific Gas and Electric Company's Proposed Acquisition of the Oakley Project. July 23, 2012.
61. CPUC Application 12-02-013
Testimony of William A. Monsen on Behalf of Snow Summit, Inc. Concerning Revenue Requirement, Marginal Costs, and Revenue Allocation. July 27, 2012.
62. CPUC Application 12-03-026
Rebuttal Testimony of William A. Monsen on Behalf of the Independent Energy Producers Association Concerning Pacific Gas and Electric Company's Proposed Acquisition of the Oakley Project. August 3, 2012.
63. CPUC Application 12-02-013
Rebuttal Testimony of William A. Monsen on Behalf of Snow Summit, Inc. in Response to the Division of Ratepayer Advocates' Opening Testimony. August 27, 2012.
64. Public Utilities Commission of the State of Colorado Docket No 11A-869E
Supplemental Answer Testimony of William A. Monsen on Behalf of Colorado Independent Energy Association, Colorado Energy Consumers and Thermo Power & Electric LLC. September 14, 2012.
65. Public Utilities Commission of the State of Colorado Docket No 11A-869E
Supplemental Cross Answer Testimony of William A. Monsen on Behalf of Colorado Independent Energy Association, Colorado Energy Consumers and Thermo Power & Electric LLC. October 5, 2012.
66. Public Utilities Commission of the State Oregon Docket No UM 1182
Northwest and Intermountain Power Producers Coalition Direct Testimony of William A. Monsen. November 16, 2012.
67. Public Utilities Commission of the State Oregon Docket No UM 1182
Northwest and Intermountain Power Producers Coalition Exhibit 300 Witness Reply Testimony of William A. Monsen. January 14, 2013.
68. CPUC Rulemaking 12-03-014
Testimony of William A. Monsen on Behalf of the Independent Energy Producers Association Concerning Track 4 of the Long-Term Procurement Plan Proceeding. September 30, 2013.
69. CPUC Rulemaking 12-03-014
Rebuttal Testimony of William A. Monsen on Behalf of the Independent Energy Producers Association Concerning Track 4 of the Long-Term Procurement Plan Proceeding. October 14, 2013.

70. CPUC Application 13-07-021
Response Testimony of William A. Monsen on Behalf of Interwest Energy Alliance
Regarding the Proposed Merger of NV Energy, Inc. with Midamerican Energy Holdings
Company. October 24, 2013.

71. CPUC Application 13-12-012
Testimony of William A. Monsen on Behalf of Commercial Energy Concerning
SDG&E's 2015 Gas Transmission and Storage Rate Application. August 11, 2014.

72. Public Utilities Commission of Nevada Docket No. 14-05003
Direct Testimony of William A. Monsen on Behalf of Ormat Nevada Inc. August 25,
2014.

73. CPUC Application 13-12-012/I.14-06-016
Rebuttal Testimony of William A. Monsen on Behalf of Commercial Energy Concerning
SDG&E's 2015 Gas Transmission & Storage Application. September 15, 2014.

74. CPUC Rulemaking 12-06-013
Testimony of William A. Monsen on Behalf of Vote Solar Concerning Residential
Electric Rate Design Reform. September 15, 2014.

75. CPUC Rulemaking 13-12-010
Opening Testimony of William A. Monsen on Behalf of the Independent Energy
Producers Association Regarding Phase1A of the 2014 Long-Term Procurement
Planning Proceeding. September 24, 2014.

76. CPUC Application 14-01-027
Testimony of William A. Monsen on Behalf of the City of San Diego Concerning the
Application of SDG&E for Authority to Update Electric Rate Design. November 14,
2014.

77. CPUC Application 14-01-027
Rebuttal Testimony of William A. Monsen on Behalf of the City of San Diego
Concerning the Application of SDG&E for Authority to Update Electric Rate Design.
December 12, 2014.

78. CPUC Rulemaking 13-12-010
Testimony of William A. Monsen on Behalf of the Independent Energy Producers
Association Regarding Supplemental Testimony in Phase1A of the 2014 Long-Term
Procurement Planning Proceeding. December 18, 2014.

79. CPUC Application 14-06-014
Opening Testimony of William A. Monsen on Behalf of the Independent Energy
Producers Association Regarding Standby Rates in Phase 2 of SCE's 2015 Test Year
General Rate Case. March 13, 2015.

80. CPUC Application 14-04-014
Opening Testimony of William A. Monsen on Behalf of ChargePoint, Inc. Regarding SDG&E's Vehicle Grid Integration Pilot Program. March 16, 2015.
81. Public Utilities Commission of the State of Hawaii Docket No. 2015-0022
Direct Testimony on Behalf of AES Hawaii, Inc. July 20, 2015.
82. Federal Energy Regulatory Commission Docket Nos. EL02-60-007 and EL02-62-006 (Consolidated)
Prepared Answering Testimony of William A. Monsen on Behalf of Iberdrola Renewables Regarding Rate Impacts of the Iberdrola Contract. July 21, 2015.
83. Public Utilities Commission of Nevada Docket Nos. 15-07041 and 15-07042
Prepared Direct Testimony of William A. Monsen on Behalf of the Alliance for Solar Choice (TASC). October 27, 2015.
84. Arizona Corporation Commission Docket No. E-00000J-14-0023
Rebuttal Testimony of William A. Monsen on Behalf of the Alliance for Solar Choice (TASC). April 7, 2016.
85. Arizona Corporation Commission Docket No. E-01461A-15-0363
The Energy Freedom Coalition of America's (EFCA) Direct Testimony of William A. Monsen. June 1, 2016.
86. Public Utilities Commission of the State of Colorado Proceeding No. 16AL-0048-E
Answer Testimony of William A. Monsen on Behalf of Vail Summit Resorts, Inc. June 6, 2016.
87. CPUC Application 15-04-012
Direct Testimony of William A. Monsen on Behalf of the City of San Diego Regarding Marginal Costs, Revenue Allocation, and Rate Design. July 5, 2016.
88. Arizona Corporation Commission Docket No. E-01461A-15-0363
The Energy Freedom Coalition of America's (EFCA) Direct Testimony of William A. Monsen and Patrick J. Quinn. July 29, 2016.
89. Arizona Corporation Commission Docket No. E-01461A-15-0363
The Energy Freedom Coalition of America's (EFCA) Rebuttal Testimony of William A. Monsen. August 15, 2016.
90. CPUC Application 15-04-012
Rebuttal Testimony of William A. Monsen on Behalf of the City of San Diego Regarding Marginal Costs, Revenue Allocation, and Rate Design. October 14, 2016.
91. Public Utilities Commission of Nevada Docket No. 16-07001 and 16-08027

Direct Testimony of William A. Monsen on Behalf of Ormat Nevada Inc. November 10, 2016.

92. CPUC Application 15-04-012
Joint Supplemental Testimony of Cynthia Fang on Behalf of San Diego Gas & Electric Company, R. Thomas Beach on Behalf of The Solar Energy Industries Association, Maurice Brubaker on Behalf of The Federal Executive Agencies, And William A. Monsen on Behalf of the City of San Diego. November 14, 2016.
93. CPUC Application 15-04-012
Joint Supplemental Testimony of Cynthia Fang on Behalf of San Diego Gas & Electric Company, Nathan Chau on Behalf of The Office of Ratepayer Advocates, William Monsen on Behalf of the City of San Diego and Alison M. Lechowicz on Behalf of the California City-County Street Light Association. November 16, 2016.
94. Public Utilities Commission of Nevada Docket No. 16-07001 and 16-08027
Supplemental Direct Testimony of William A. Monsen on Behalf of Ormat Nevada Inc. November 17, 2016.
95. Public Utilities Commission of the State of Colorado Proceeding No. 16A-0396E
Answer Testimony of William A. Monsen on Behalf of Colorado Independent Energy Association. December 9, 2016.
96. JAMS Arbitration Case No: 1220049998
Declaration of William A. Monsen on Behalf of Watson Cogeneration Company and Camino Energy, LLC. January 11, 2017.
97. CPUC Application A.16-06-013
Direct Testimony of William A. Monsen and Anna Casas on Behalf of South San Joaquin Irrigation District. March 15, 2017.
98. CPUC Application A.16-09-003
Direct Testimony of William A. Monsen on Behalf of the California Solar Energy Industries Association in Southern California Edison's Rate Design Window Application. April 28, 2017.
99. American Arbitration Association Case No. 01-16-0002-2121
Claimant Buena Vista Biomass Power, LLC's Expert Witness Disclosure. August 18, 2017.
100. American Arbitration Association Case No. 01-16-0005-1073
Expert Report of William A. Monsen on Behalf of Saguaro Power Company. September 15, 2017.
101. CPUC Application A.17-05-004
Direct Testimony of William A. Monsen on Behalf of Snow Summit LLC in Bear Valley

Electric Services General Rate Case Application. September 29, 2017.

102. CPUC Application A.17-05-004
Rebuttal to Testimony by the Office of Ratepayer Advocates by William A. Monsen on Behalf of Snow Summit LLC in Bear Valley Electric Services General Rate Case Application. October 27, 2017.
103. Superior Court of California, County of San Diego Case No. 37-2015-00014540-CU-MC-CTL
Declaration in Support of Defendant's Motion for Summary Judgement, or in the Alternative, Motion for Summary Adjudication. February 3, 2018.
104. CPUC Application 17-06-030
Testimony of William A. Monsen on Behalf of the Coalition for Affordable Street Lights Concerning Street Light Rates and LED Conversions. March 23, 2018.
105. CPUC Application 17-09-006
Direct Testimony of William A. Monsen on Behalf of The Western Manufactured Housing Communities Association in Pacific Gas & Electric's 2018 Gas Cost Allocation and Rate Design Proceeding. June 20, 2018.
106. JAMS Arbitration No. 1100088728
Expert Report by William A. Monsen for Aera Energy, LLC. July 24, 2018.
107. JAMS Arbitration No. 1100088728
Conclusions and Summary of Opinions of William A. Monsen for Aera Energy, LLC. July 24, 2018.
108. CPUC Application 18-03-003
Prepared Joint Testimony of Brandon Charles on Behalf of the California Farm Bureau Federation, William A. Monsen on Behalf of the City of San Diego and Cynthia Fang on Behalf of San Diego Gas and Electric Company. August 20, 2018.
109. CPUC Application 18-03-003
Prepared Supplemental Testimony of Brandon Charles on Behalf of the California Farm Bureau Federation, William A. Monsen on Behalf of the City of San Diego and Cynthia Fang on Behalf of San Diego Gas and Electric Company. September 27, 2018.
110. CPUC Application 19-03-002
Direct Testimony of William A. Monsen on Behalf of the City of San Diego Regarding Marginal Costs, Revenue Allocation, and Rate Design. April 6, 2020.
111. CPUC Application 19-11-019
Direct Testimony of William A. Monsen and Carlo Bencomo-Jasso on Behalf of the California Farm Bureau Federation Concerning Revenue Allocation and Agricultural Rate Design. November 20, 2020.

112. Rachel Kropp et al vs Southern California Edison Company Case No. BC698926
Declaration of William A. Monsen on Behalf of Brent & Foil, LLP. December 24, 2020.
113. CPUC Application 19-11-019
Reply Testimony of William A. Monsen and Carlo Bencomo-Jasso on Behalf of the California Farm Bureau Federation Concerning Revenue Allocation and Agricultural Rate Design. February 26, 2021.
114. CPUC Application 20-10-012
Direct Testimony of William A. Monsen on Behalf of the California Farm Bureau Federation Concerning Revenue Allocation and Agricultural Rate Design. July 26, 2021.
115. Public Utilities Commission of the State of Colorado Docket No. 21A-0141E
Hearing Exhibit No. 1000 Answer Testimony and Attachments of William A. Monsen on Behalf of the Colorado Independent Energy Association. October 11, 2021.
116. Kern County Assessment Appeals Board
Testimony of William A. Monsen on Behalf of Clearway Energy Regarding Differences Between Standard Offer Contracts and Modern PPAs. October 19, 2021.
117. Public Utilities Commission of the State of Colorado Docket No. 21A-0141E
Hearing Exhibit No. 1001 Cross-Answer Testimony and Attachments of William A. Monsen on Behalf of the Colorado Independent Energy Association. November 12, 2021.
118. Public Utilities Commission of the State of Colorado Docket No. 21A-0141E
Hearing Exhibit No. 1002 Testimony and Attachments in Opposition to the Non-Unanimous Partial Settlement Agreement of William A. Monsen on Behalf of the Colorado Independent Energy Association. December 6, 2021.
119. CPUC Application 21-06-021
Prepared Testimony of William A. Monsen Addressing Generation Supply Costs on Behalf of The Utility Reform Network (TURN). June 13, 2022
120. CPUC Application 22-05-016
Prepared Testimony of William A. Monsen Addressing Generation Supply Costs on Behalf of The Utility Reform Network. March 27, 2023.
121. CPUC Application 22-08-010
Direct Testimony of William A. Monsen on Behalf of Snow Summit LLC in Bear Valley Electric Services General Rate Case. May 26, 2023.
122. CPUC Application 22-08-010
Rebuttal Testimony of William A. Monsen on Behalf of Snow Summit LLC in Bear Valley Electric Services General Rate Case. June 16, 2023.

123. CPUC Rulemaking 23-01-007

Prepared Testimony of William A. Monsen Addressing Costs of the Diablo Canyon Power Plant on Behalf of The Utility Reform Network. June 30, 2023.

APPENDIX WAM-2
DATA REQUEST RESPONSES FROM SDG&E

1. City of San Diego Data Request 1, Question 10
2. City of San Diego Data Request 3, Question 3
3. City of San Diego Data Request 3, Question 4
4. City of San Diego Data Request 3, Question 4c attachment

GRC Phase 2 Data Request
MRW & Assoc on Behalf of the City of San Diego
CityofSanDiego-SDG&E-DR-001
DATE RECEIVED: May 16, 2023
DATE DUE: May 30, 2023
DATE RESPONDED: May 31, 2023

10. Has SDG&E considered splitting the M/L C&I class at any kW level other than 200 kW? If so, please provide the results of such considerations and all workpapers supporting such considerations. Please provide these workpapers in Excel.

SDG&E Response:

SDG&E has provided its analysis presented in the Medium/Large Customer Class Workshop held on November 10, 2022. Please see attached folder “Q10”, which contains excel files titled “A2201008 - CoSD DR1, Q10_Agricultural.xlsx”, “A2201008 - CoSD DR1, Q10_Medium.xlsx” and the attached PDF titled “SDGE_Medium Commercial Class Workshop_111022”.

END OF RESPONSE

GRCA Phase 2 Data Request

The City of San Diego

CoSD-SDGE-DR-003

DATE RECEIVED: November 29, 2023

DATE RESPONDED: December 13, 2023

3. Regarding SDG&E's proposal to add the hours of 10 am – 2 pm to the super-off-peak hours on all weekdays, please respond to the following questions:
 - a. How would this proposal affect super-off-peak hours for EV charging?
 - b. Which tariffs would this proposal apply to? Please provide a list of all tariffs that would be affected by SDG&E's proposal if it were adopted by the Commission.
 - c. How will the change in base TOU time periods affect tariffs that do not use the base TOU periods?
 - d. Please provide a listing of the TOU periods that would be applicable for each of SDG&E's tariffs assuming that Commission adopts SDG&E's proposal related to the change in super-off-peak hours for the base TOU periods.

SDG&E Response:

- a. SDG&E objects to this request on the grounds that it is vague and ambiguous with regards to the term "affect". Subject to and not foregoing this objection, SDG&E responds as follows:

Besides those described in testimony, SDG&E is not proposing to make any other changes to its super off-peak TOU period hours. All else equal, the number of super off-peak TOU period hours will increase relative to the current effective standard TOU periods for tariffs that have a three-period TOU structure with an on-peak, off-peak, and super off-peak period.

- b. As stated in the Revised Direct Testimony of Samantha Pate (Chapter 1) at p. SP-14, SDG&E is proposing that all tariffs that 1) do not currently have legacy TOU periods and 2) have a super off-peak period, be required to take service on SDG&E's proposed TOU periods. SDG&E is not proposing a change for solar customers taking service on legacy TOU periods (pre-2017 TOU periods) per D.17-01-006 and D.17-10-018.
- c. SDG&E objects to this question on the grounds that it is vague and ambiguous with regards to the term "affect". Subject to and not foregoing this objection, SDG&E responds as follows:

See response to 3.b. Additionally, this proposal would not affect tariffs that have two-period TOU periods, as those tariffs do not have a super off-peak period.

- d. See response to 3.b and 3.c.

GRC Phase 2 Data Request

The City of San Diego

CoSD-SDGE-DR-003

DATE RECEIVED: November 29, 2023

DATE RESPONDED: December 13, 2023

4. Regarding SDG&E's proposed reduction in medical baseline discount, please respond to the following questions:

- a. Please provide a citation to the decision in which SDG&E's current medical baseline discount was authorized. Also, please provide copies of SDG&E's testimony in that proceeding.
- b. Please provide all workpapers supporting SDG&E's assertion that its medical baseline discount is unjust and unreasonable. If no such workpapers exist, please so state.
- c. Please provide bill impacts (both in dollars per year and in percentage change in annual bills) for each year of the transition period proposed by SDG&E associated with SDG&E's proposed change in medical baseline discount (relative to the current medical baseline discount). Please disaggregate these impacts between rate schedules and, if appropriate, between customers on tiered rates and customers on non-tiered rates. Also, please provide the number of customers receiving medical baseline discount by rate schedules and, if appropriate, between customers on tiered rates and customers on non-tiered rates. Also, please provide workpapers supporting these calculations.

SDG&E Response:

- a. SDG&E objects to this request on grounds that it calls for a legal conclusion and seeks information publicly available and equally available to the City of San Diego. SDG&E is not required to do legal research for intervening parties.
- b. SDG&E objects to this request on grounds that it mischaracterizes SDG&E's testimony regarding its medical baseline related requests. Subject to and without waving the foregoing objection, SDG&E responds as follows:

SDG&E's medical baseline adjustment proposal is included in the Revised Direct Testimony of Ray Utama, Chapter 3, at pages 7-10. There are no associated workpapers.

- c. SDG&E objects to this request to the extent it seeks analysis not already performed. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

Please see response to Data Request TURN-SDGE-003. SDG&E provided workpapers in response to Q1.b that show current bills for medical baseline customers. The attached file "CoSD-SDG&E-DR-003_Q4.c" provides sample illustrative bills for an average medical baseline customer using 600 kWh per month. In the sample illustrative bills SDG&E calculates bills for Year 1, Year 2 and Year 3 using proposed changes to medical baseline discount.

END OF RESPONSE

MB Discount: Illustrative Customer Bill

Current Treatment	Current Bill	Total Discount	\$	109.68
Non-MB Bill	\$ 317.13			
Exemptions	\$ (0.33)			
Rate Discount	\$ (81.47)			
Additional Baseline	\$ (27.88)			
MB Bill	\$ 207.45			
Effective discount	-34.6%			

	Year 1 (2024)	Total Discount	\$	98.83
Non-MB Bill	\$ 317.13			
Exemptions	\$ (0.33)			
Line Item Discount	\$ (70.63)			
Additional Baseline	\$ (27.88)			
MB Bill	\$ 218.30			
Effective discount	-31.2%			

Current Treatment	Year 2 (2025)	Total Discount	\$	77.11
Non-MB Bill	\$ 317.13			
Exemptions	\$ (0.33)			
Line Item Discount	\$ (48.90)			
Additional Baseline	\$ (27.88)			
MB Bill	\$ 240.02			
Effective discount	-24.3%			

Current Treatment	Year 3 (2026)	Total Discount	\$	66.26
Non-MB Bill	\$ 317.13			
Exemptions	\$ (0.33)			
Line Item Discount	\$ (38.06)			
Additional Baseline	\$ (27.88)			
MB Bill	\$ 250.87			
Effective discount	-20.9%			

	Total Bill	Annual Change	% Change
Current	\$ 207.45		
2024	\$ 218.30	\$ 10.85	5.2%
2025	\$ 240.02	\$ 21.72	10.0%
2026	\$ 250.87	\$ 10.85	4.5%
Total	\$ 43.42		20.9%

APPENDIX WAM-3
OTHER DOCUMENTS REFERRED TO IN TESTIMONY

1. Excerpts from Prior Monsen Testimony in A.19-03-002
2. SDG&E Split Study
3. Excerpt from SDG&E Schedule AL-TOU
4. Excerpt from SDG&E Schedule PA-T-1
5. Excerpt from Redacted PG&E Bill
6. Excerpt from Redacted SDG&E Bill

Docket No. A.10-07-009 and A.19-03-002

Exhibit No. _____

Date April 6, 2020

Witness William A. Monsen

**DIRECT TESTIMONY OF WILLIAM A. MONSEN
ON BEHALF OF THE CITY OF SAN DIEGO REGARDING MARGINAL
COSTS, REVENUE ALLOCATION, AND RATE DESIGN
IN APPLICATIONS 10-07-009 AND 19-03-002**

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1

2 **II. SDG&E Should Simplify Its Tariff Structure to be** 3 **Consistent with Other IOUs**

4

5 **Q. What is the purpose of this section of your testimony?**

6 A. This section of my testimony addresses the unwieldy tariff structure that SDG&E has
7 relative to the other IOUs.

8 **A. SDG&E's Current Tariff Structure**

9

10 **Q. What is SDG&E's current tariff structure?**

11 A. At the present time, SDG&E has two broad categories of electric tariffs: (1) commodity
12 tariffs and (2) distribution tariffs.³ The following table presents the list of SDG&E's
13 current electric tariffs for Commercial/Industrial, Streetlighting and Agricultural
14 customers.

15 **Table 1: Relationship Between SDG&E's Distribution and Commodity Tariffs**

Customer Class	Distribution Tariff	Commodity Tariff
Commercial/Industrial	Schedule TOU-A	Schedule EECC-TOU-A-P (unless it opts to another tariff)
	Schedule TOU-A2	Schedule EECC-TOU-A-P
	Schedule TOU-A3	"Applicable EECC price"
	Schedule A-TC	Schedule EECC
	Schedule TOU-M	Schedule EECC-CPP-D (monthly maximum demand not less than 20 kW for 3 consecutive months) Schedule EECC-CPP-D (optionally if monthly maximum demand less than 20 kW for 3 consecutive months)*
	Schedule AL-TOU	Schedule EECC-CPP-D (monthly maximum demand not less than 20 kW for 3 consecutive months) Schedule EECC-CPP-D (optionally if monthly maximum demand less than 20 kW for 3 consecutive months)*
	Schedule AL-TOU2	Schedule EECC or Schedule EECC-CPP-D (optionally)
	Schedule A6-TOU	Schedule EECC-CPP-D
	Schedule DG-R	Schedule EECC-CPP-D (monthly maximum demand

³ SDG&E has many tariffs other than just the commodity and distribution tariffs discussed in this testimony. However, to simplify the presentation, my testimony only discusses that interaction of the commodity and distribution tariffs. The summary of interaction between Utility Distribution Company and Commodity rates presented in Table 1 was derived based on a review of those tariffs. See <https://www.sdge.com/rates-and-regulations/current-and-effective-tariffs>

		not less than 20 kW for 3 consecutive months) Schedule EECC-CPP-D (optionally if monthly maximum demand less than 20 kW for 3 consecutive months)*
	Schedule OL-TOU	Schedule EECC-CPP-D (monthly maximum demand not less than 20 kW for 3 consecutive months) Schedule EECC-CPP-D (optionally if monthly maximum demand less than 20 kW for 3 consecutive months)*
Streetlighting	Schedule LS-1	Schedule EECC
	Schedule LS-2	Schedule EECC
	Schedule LS-2 DS	Schedule EECC
	Schedule LS-2 AD	Schedule EECC
	Schedule LS-3	Schedule EECC
	Schedule OL-1	Schedule EECC
	Schedule OL-2	Schedule EECC
	Schedule DWL	Schedule EECC
Agricultural	Schedule TOU-PA	Schedule EECC Schedule EECC-TOU-PA-P (optional)
	Schedule TOU-PA2	Schedule EECC Schedule EECC-TOU-CPP-D-AG (optional)
	Schedule TOU-PA3	Schedule EECC (below 200 kW) Schedule EECC-CPP-D-AG (equal to or above 200 kW)
	Schedule TOU-PA-T-1	Schedule EECC (below 200 kW)** Schedule EECC-CPP-D-AG (above 200 kW)

* Customer can also take commodity service under Schedule EECC-TOU-P but then must take UDC service is under Schedule TOU-A.

** If Monthly Max Demand is less than 20 kW, Customer can also take commodity service under Schedule EECC-TOU-PA-P but then must take UDC service is under Schedule TOU-PA.

As can be seen from the above table, all non-residential customers must refer to two or more tariff sheets to understand the tariffs under which they take service.

Q. Do other IOUs use a similar tariff structure?

A. No. Both PG&E and SCE present all of the typical charges for each account in a single tariff.

Q. Why is the City concerned with the structure of SDG&E's tariffs when it is in the process of forming a CCA program and its accounts will likely no longer be taking commodity service from SDG&E?

A. Under SDG&E's current tariff structure, the Utility Distribution Company (UDC) tariffs do not present potential exit fees that CCA (and other departing load) customers may have to pay; those charges are presented in yet another SDG&E tariffs (Schedule CCA-

1 CRS). Thus, departing load customers will have to refer to at least four separate tariffs to
2 be able to understand their bills: (1) the UDC tariff, (2) the Commodity tariff, (3) the Exit
3 Fee tariff, and (4) the DWR Bond Charge tariff.

4

5 **Q. Why do CCA customers have to refer to the Commodity tariff?**

6 A. Despite the fact that the CCA will be providing commodity service to its customers,
7 SDG&E's UDC tariff explicitly states that:

8 The bills for a DA and CCA Customer will be calculated as if they were a UDC
9 Bundled Service Customer, then crediting the bill by the amount of the EECC
10 component, as determined for a UDC Bundled Customer, and including the
11 appropriate Cost Responsibility Surcharge (CRS) if applicable.⁴

12

13 What this means is that SDG&E will calculate the bill for the CCA as if it were a bundled
14 service customer and then credit the amount from SDG&E's Commodity tariff. Thus, if a
15 customer wanted to replicate SDG&E's bill calculation, the customer would have to
16 examine SDG&E's Commodity tariff.

17

18 **Q. What do you recommend?**

19 A. SDG&E should restructure its tariffs to consolidate all charges for a single rate option
20 into a single tariff.

21

22 **Q. Why should the Commission order SDG&E to take this step?**

23 A. Tariffs are complicated. However, SDG&E's presentation of its tariffs only compounds
24 the complication faced by customers. Customers should be able to find their rates in a
25 single tariff (excluding special conditions such as Net Energy Metering) and not have to
26 hunt around to multiple tariffs in order to understand the charges on their bills.

27

28 **Q. Over what period should SDG&E revise its tariffs?**

29 A. SDG&E should update its tariffs in compliance within one year of the effective date of
30 the decision in this proceeding. This would give SDG&E adequate time to revise the

⁴ Schedule AL-TOU, Sheet 8, Special Condition 14, effective December 17, 2017 (see Exhibit WAM-2).

1 tariffs.

2

3 **Q. Wouldn't your recommendation require SDG&E to establish a number of new**
4 **tariffs?**

5 A. No. Customers identify themselves with their distribution tariffs. SDG&E should simply
6 expand the information presented in the distribution tariffs to provide customers with all
7 of the rates that customers would face. It should also be noted that by consolidating its
8 commodity tariffs into the tariffs that currently only provide information about
9 distribution rates, SDG&E's tariff book would be simplified because there would no
10 longer be a need for SDG&E's commodity tariffs. Thus, my recommendation would
11 result in a significant simplification for customers.

12

13 **III. SDG&E Should Split its Commercial/Industrial Customer** 14 **Class into Medium and Large Customers**

15

16 **Q. What is the purpose of this section of your testimony?**

17 A. This section of my testimony recommends that SDG&E should begin the process for
18 splitting its so-called "Medium/Large Commercial/Industrial" (M/L-C/I) customer class
19 into two separate customer classes.

20 **A. Current Situation**

21

22 **Q. What customers are included currently in SDG&E's M/L-C/I customer class?**

23 A. Currently, SDG&E includes customers in the M/L-C/I customer class that have
24 maximum monthly demands of 20 kW or less to those with maximum monthly demands
25 of 10 MW or more. For example, SDG&E's Schedule AL-TOU is applicable as follows:

26

27 **APPLICABILITY**

28 Applicable to all metered non-residential customers **whose Monthly Maximum**
29 **Demand equals, exceeds, or is expected to equal or exceed 20 kW**. This
30 schedule is not applicable to residential customers, except for those three-phase
31 residential customers taking service on this schedule as of April 12, 2007 who
32 may remain on this schedule while service continues in their name at the same

1 service address. Those three-phase residential customers remaining on this
2 schedule who choose to switch to a residential rate schedule may not return to this
3 schedule. This schedule is **optionally available to common use and metered**
4 **non-residential customers whose Monthly Maximum Demand is less than 20**
5 **kW.** Any customer whose Maximum Monthly Demand has fallen below 20 kW
6 for three consecutive months may, at their option, elect to continue service under
7 this schedule or be served under any other applicable schedule. **This schedule is**
8 **the utility's standard tariff for commercial and industrial customers with a**
9 **Monthly Maximum Demand equaling or exceeding 20 kW.** Customers on this
10 Schedule whose Monthly Maximum Demand is not less than 20 kW for three
11 consecutive months will also take commodity service on Schedule EECC-CPP-D.
12 Customers on this Schedule whose Monthly Maximum Demand is less than 20
13 kW for three consecutive months must also take commodity service; they may
14 optionally elect Schedule EECC-CPP-D or they may choose Schedule
15 EECCTOU-A-P in which case their Utility Distribution Company service rate
16 would be Schedule TOU-A. In addition, customers may exercise the right to opt-
17 out of the applicable dynamic rate (e.g., EECC-CPP-D or EECC-TOU-A-P) to
18 their otherwise applicable Utility Distribution Company and commodity rates. For
19 opt-out provisions, refer to the applicable commodity tariff.⁵
20

21 As seen from the Applicability section of this tariff presented above, Schedule AL-TOU
22 is the “standard tariff for commercial and industrial customers with Monthly Maximum
23 Demand equaling or exceeding 20 kW.” In other words, SDG&E’s M/L-C/I class
24 consists of customers with Monthly Maximum Demands of 20 kW and up (and is
25 optionally available to customers with Monthly Maximum Demands less than 20 kW).
26

27 **Q. Doesn't SDG&E have a tariff that is aimed at customers with maximum demands
28 up to 40 kW?**

29 A. Yes. Schedule TOU-M is for customers that have monthly maximum demands between
30 20 kW and 40 kW.

31
32 **Q. Does SDG&E attempt to differentiate between different sizes of customers in its
33 standard tariff for M/L-C/I customers?**

34 A. To a very limited extent. Going back to Schedule AL-TOU, SDG&E differentiates Basic
35 Service Fees between customers in three buckets: 0-500 kW, >12 MW, and all other

⁵ Schedule AL-TOU, Sheet 1, effective February 1, 2020 (Emphasis added) (See Exhibit WAM-2).

1 customers. SDG&E also differentiates charges between different voltage levels (e.g.,
2 Secondary, Primary, Transmission).

3

4 **Q. Has SDG&E justified its definition of the M/L-C/I class in this proceeding?**

5 A. There does not appear to be any sort of justification or rationale for its definitions of
6 customer classes in SDG&E's showing. SDG&E simply used the same definition of this
7 customer class that it used previously.

8

9 **Q. Has SDG&E considered dividing its M/L-C/I class?**

10 A. Evidently not. In response to a discovery request, SDG&E indicated that it "has not
11 considered establishing a new customer class for Medium Commercial/Industrial
12 customers."⁶

13

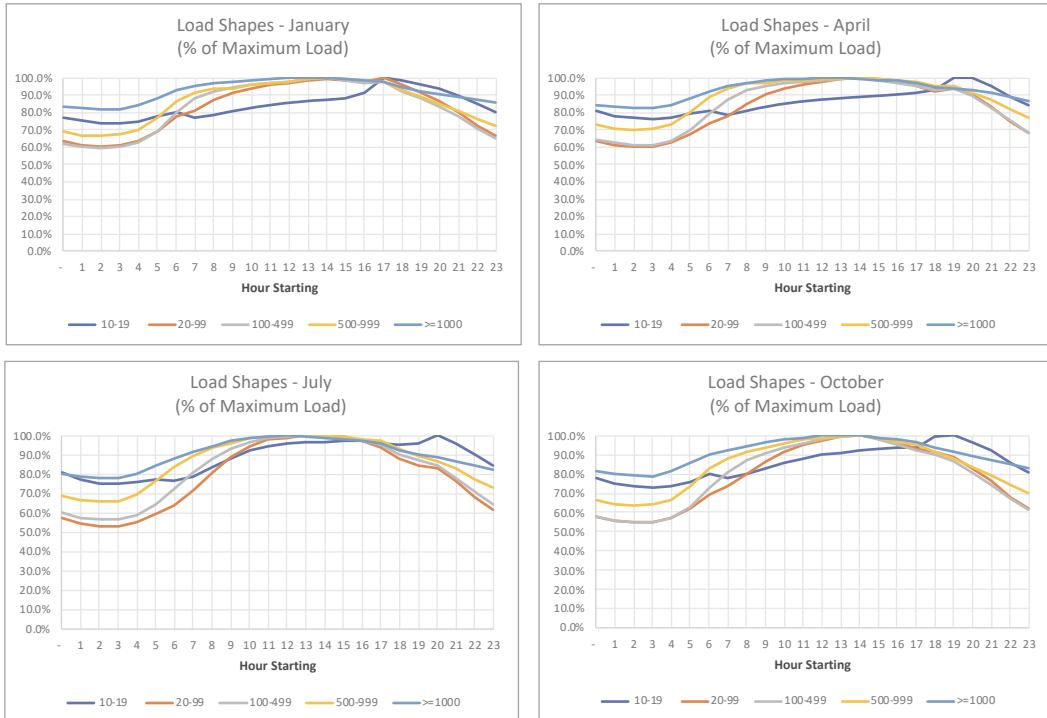
14 **Q. Are there significant differences between customers of different Monthly Maximum
15 Demands?**

16 A. Yes. SDG&E has provided information about the average hourly loadshapes for non-
17 residential customers with a range of maximum demands (10 kW - 20 kW, 20 kW - 100
18 kW, 100 kW - 500 kW, 500 kW -1,000 kW, and above 1,000 kW). The following figures
19 show how different these average loadshapes are for four months of the year (i.e.,
20 January, April, July, and October):

21

⁶ SDG&E Response to City of San Diego Data Request #5, Question 1. (See Exhibit WAM-2).

Figure 1: Monthly-Average Load Shapes for Customers with Different Maximum Demands (% of Maximum Demand)



Derived from SDG&E Response to City of San Diego Data Request #5, Question 2.

These figures present the ratio of monthly-average hourly loads to the maximum monthly-average hourly load for the five different sets of customers. For example, if one group of customers has a monthly-average maximum demand of 400 kW in hour starting 15 and the monthly-average demand in hour starting 12 is 300 kW, then the values on the figure for hours starting 12 and 15 would be 75% and 100%, respectively, for that customer group. By presenting the data in this way, it is possible to compare the way that customers with significantly different size loads change by group across the day and month.

As can be seen from the figures, the customers with lower maximum demands have much lower loads in the evening hours than customers with higher maximum demands. For example, in January customers with maximum demands of 20-100 kW have loads in hour starting 3 that are 61% of the their maximum loads (which occurs in hour starting 17). On the other hand, in the same month, customers with maximum demands greater than 1,000

1 kW have minimum loads of 82% (in hour starting 4) of the maximum load for that month
2 (in hour starting 13). The same trend is seen across all of the months.⁷

3

4 **Q. Do you have other data that demonstrates the significant differences between**
5 **customers in these different customer groups?**

6 A. Yes. The following table presents monthly and annual load factors⁸ for these different
7 sets of customers.

8

9 **Table 2: Monthly and Annual Load Factors**

Month	10-19	20-99	100-499	500-999	>=1000
1	80.2%	68.7%	64.2%	72.2%	80.8%
2	80.4%	72.1%	67.9%	74.1%	81.4%
3	81.4%	75.0%	72.6%	75.5%	82.5%
4	80.4%	64.6%	62.6%	70.5%	79.5%
5	82.2%	69.0%	66.8%	76.5%	84.0%
6	82.8%	66.6%	66.1%	74.2%	81.0%
7	82.2%	67.4%	66.9%	73.2%	78.8%
8	82.2%	67.1%	66.0%	74.0%	82.1%
9	81.7%	67.1%	63.8%	73.4%	80.2%
10	80.2%	63.4%	59.9%	68.2%	74.4%
11	78.6%	65.6%	62.8%	71.9%	80.7%
12	80.0%	74.7%	70.6%	73.9%	79.4%
Annual	73.8%	55.6%	54.5%	61.5%	71.2%

10 Derived from SDG&E Response to City of San Diego Data Request #5, Question 2.

11
12 As can be seen from Table 2, the monthly and annual load factors are typically (but not
13 always) higher for customers with maximum demands above 500 kW than for customers
14 with maximum demands of 20-500 kW. Customers with higher load factors have more
15 even loads than customers with lower load factors. This is seen in Figure 1, where the
16 customer groups with lower maximum demands have lower relative loads in the
17 nighttime hours than customer with higher maximum demands.

⁷ Customers with maximum demands of 10-20 kW have very different load shapes than all of the other customer groups. This is likely because those customers would normally be considered a small commercial customer but opt into taking service under M/L-C/I tariffs because of their unusual load characteristics.

⁸ Load factor is defined as the ratio of the average load during a period divided by the maximum load during the same period.

1
2 **Q. Has SDG&E analyzed the reasonableness of grouping Commercial/Industrial**
3 **customers with Maximum Monthly Demands of less than 50 kW with customers**
4 **with Maximum Monthly Demands of over 500 kW.**

5 A. No. SDG&E has not performed any such analysis.⁹

6
7 **Q. Why is it unreasonable for SDG&E to group these customers with such disparate**
8 **load characteristics together?**

9 A. The costs to serve customers with such different load characteristics are likely very
10 different. As a result, grouping those customers together sends incorrect price signals to
11 those customers because their rates are not based on their marginal costs of service.

12
13 **Q. Do other IOUs have a single M/L-C/I customer class?**

14 A. No. PG&E has several different customer classes for its C/I customers.¹⁰ Similarly, SCE
15 has more than a single customer class for its C/I customers.¹¹

16
17 **Q. What do you recommend?**

18 A. The Commission should order SDG&E to divide its M/L-C/I customer class into parts
19 that more accurately reflect the costs of service for each sub-group.

20
21 **Q. Do you recommend that these new customer class(es) be established in this**
22 **proceeding?**

23 A. No. I recognize the amount of work that such an undertaking would require. For that
24 reason, I recommend that the Commission order SDG&E to undertake this effort in its
25 next GRC Phase II proceeding.

⁹ See SDG&E Response to City of San Diego Data Request #5, question 3. (See Exhibit WAM-2).

¹⁰ PG&E's customer classes for its C/I customers are: Small, Medium, E-19, E-20S, E-20P, and E-20T.

¹¹ SCE's Rate Groups for its C/I customers are: TOU-GS-1, TOU-GS-2, TOU-GS-3, TOU-8 (Secondary, Primary, and Sub-Transmission). SCE's Rate Groups are analogous to SDG&E's customer classes in that SCE estimates marginal costs for each Rate Group.

1
2 **Q. Do other parties believe that dividing the M/L-C/I class might be reasonable?**

3 A. PAO suggests consideration of dividing the M/L-C/I class in its opening testimony in this
4 proceeding.¹² PAO notes that both PG&E and SCE have made such splits, although those
5 utilities divided the customer class at 200 kW, while PAO suggests that the split should
6 be at 100 kW.¹³

7

8 **IV. Any New Dynamic Rates Should be Implemented As 9 Pilot Programs**

10
11 **Q. What is the purpose of this section of your testimony?**

12 A. This section of my testimony addresses potential adoption of new dynamic rates in this
13 proceeding. Dynamic rates may have their place for SDG&E but they should be optional,
14 offer “bill protection,” and initially structured as pilot programs for customers with Annual
15 Average Maximum Demands of 1,000 kW or more.

16
17 **Q. Do you have concerns regarding adoption of dynamic rates in this proceeding?**

18 A. Yes. Aside from a single workshop and workshop report,¹⁴ there has been no analysis or
19 record developed in this proceeding regarding establishment of new dynamic rates for
20 customers. The City is very concerned that absent any sort of analytical basis for
21 establishment of mandatory dynamic rates, the dynamic rates could have significant
22 unintended consequences for customers. These could include extreme bill impacts that
23 customers have little or no ability to mitigate through changes in operation or installation
24 of new technology.

¹² Prepared Testimony on San Diego Gas & Electric Company’s 2019 General Rate Case Phase 2, February 13, 2020, (PAO Testimony), p. 7-11.

¹³ PAO Testimony, p. 7-11.

¹⁴ SDG&E held a workshop on October 15, 2019. In addition, SDG&E filed a workshop report about that workshop. See “Response of San Diego Gas & Electric Company (U 902 E) To the Administrative Law Judge’s October 2, 2019 Ruling Directing San Diego Gas & Electric Company to File and Serve A Dynamic Pricing Workshop Report,” October 29, 2019.



November 10, 2022



SDG&E 2024 GRC Phase 2 Workshop on M/L Commercial Class Split Study

Agenda

1. Background & Objectives
2. Proposal
3. Medium & Large Customer Analysis
4. Illustrative Rates
5. Discussion & Feedback

Background & Objectives

SDG&E 2019 GRC Phase 2 Settlement

“SDG&E agrees to conduct analysis on whether and/or how it should propose to subdivide its M&L C&I class into two or more separate customer classes in its next GRC Phase 2 application. SDG&E will hold a workshop to share the data used and results of the study with parties and receive feedback prior to filing its next GRC Phase 2 application, including whether a proposal would be included as part of that filing.”

“SDG&E will conduct a study to examine the reasonableness of recovering a portion of distribution costs through volumetric TOU rates for M/L C&I customers and Agricultural customers.”

Objectives

- Study whether SDG&E should split its M/L C&I class into one or more customer classes
 - Based on study results, develop a new customer class that reflects cost of service for smaller customers in current M/L class
 - Evaluate the impact of recovering distribution costs through volumetric rates for M/L C&I and Agricultural customers

Proposal



SDG&E's draft plan is to propose a Medium Commercial Class in the 2024 GRC Phase 2

- Commercial customers currently on M/L Commercial Rates with demand below 200kW would be defaulted into the medium class
 - Option to opt into their previously enrolled M/L commercial rate
- Commercial customers with a maximum demand up to 200 kW would be eligible for Medium Commercial Rate schedules

Commercial Customer Designation		
Small Commercial	Medium Commercial	Large Commercial (Previously M/L)
<20 kW	20-200 kW	>=200 kW

Proposal

Eligibility for SDG&E's draft proposed Medium class was based on customer data and Commission precedent

Commission has used 200 kW as a threshold for M/L in past decisions:

- 20-200 kW referred to as “medium” in D.08-02-034
- Over 200 kW referred to as “large” in D.07-04-043

Medium Customer Data:

- Cost differences between Medium-sized compared to Large customers
 - Customer costs lower
 - Lower effective demand factors
- Large enough group of customers for development of a new class
 - Currently estimating ~15-20k qualifying Medium accounts

Medium & Large Customer Analysis

Usage Trends

MWh Consumption and Demand

Approximately 31% of M/L C&I consumption is by accounts below 200 kW

M/L Annual Consumption : MWh		
Annual MWh if <200kW	3,232,922	31%
Annual MWh if >=200kW	7,054,358	68%
Total	10,350,585	

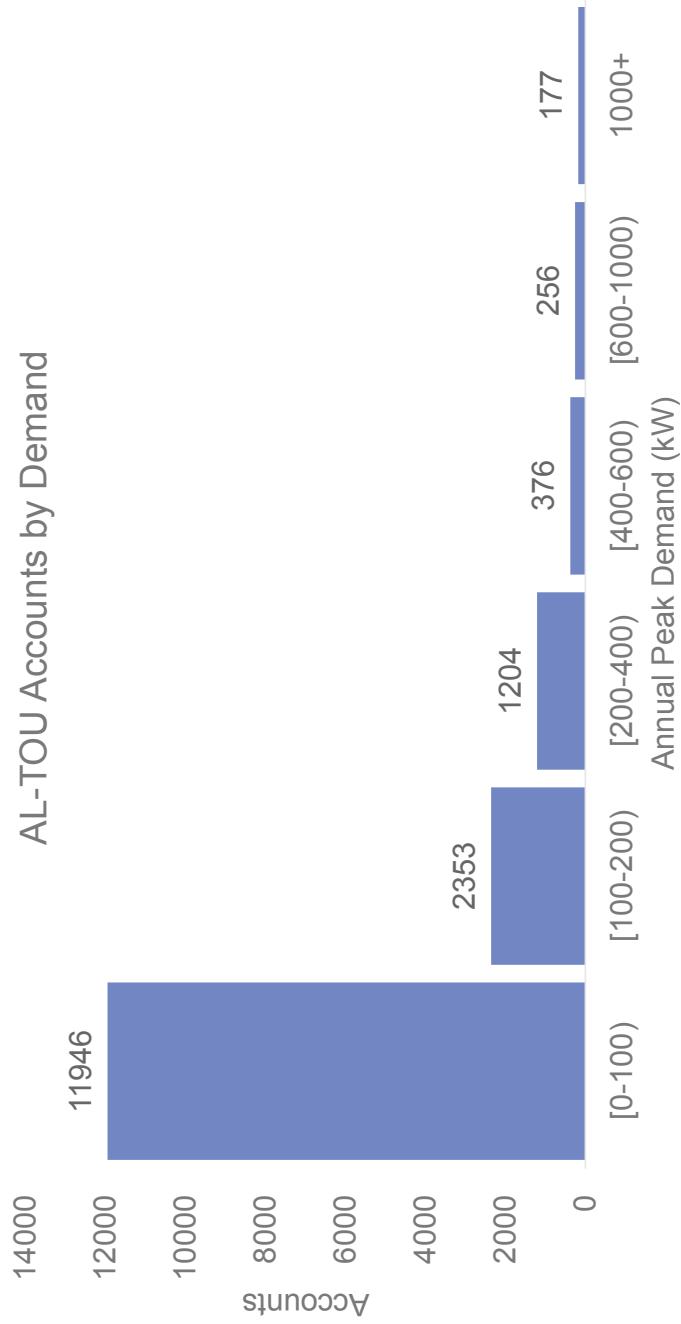
Draft Effective Demand Factors (EDFs)

<u>Circuit EDFs</u>	
Medium Commercial <200kW	~71%
Large Commercial >=200 kW	~88%

<u>Substation EDFs</u>	
Medium Commercial <200kW	~70%
Large Commercial >=200 kW	~82%

Note: All figures are draft

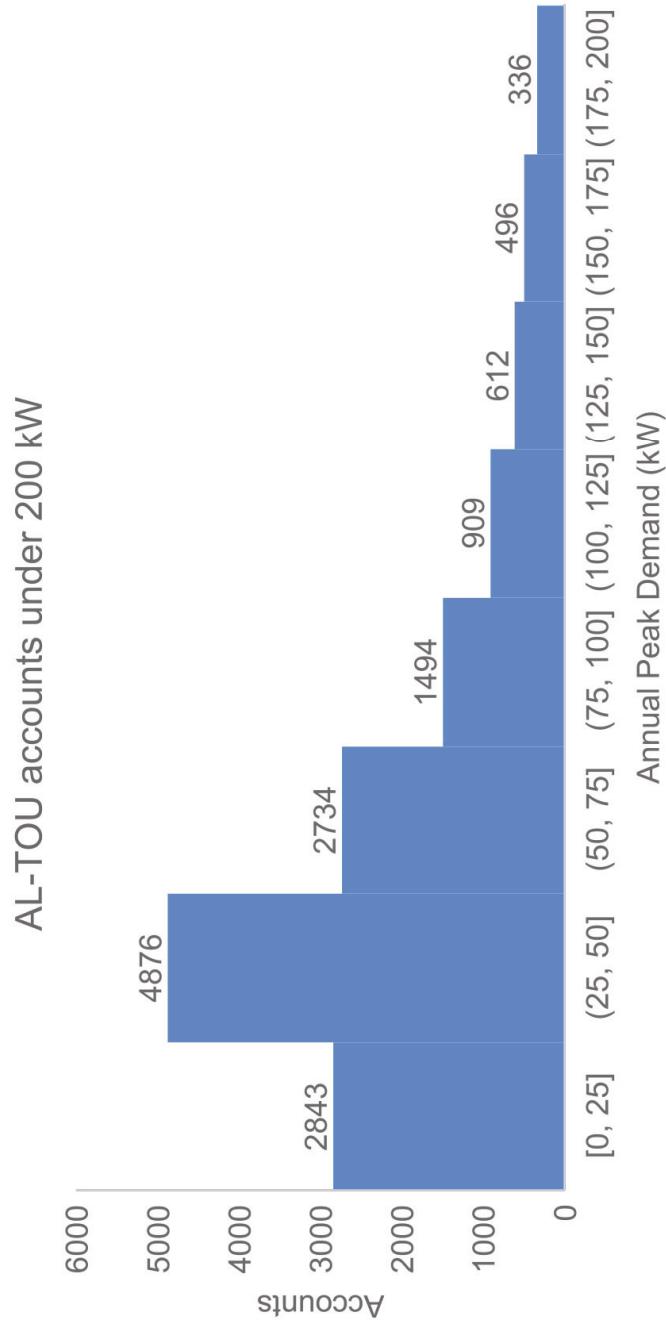
Customer Sample Analysis: kW Distribution All AL-TOU



n=16,312

Customer Sample Analysis: kW Distribution AL-TOU under 200 kW

- Under 200 kW subset of previous slide



n=14,300

Volumetric Distribution Rate Analysis

Draft Medium Commercial Rates

- Impact of collecting distribution revenue through demand or volumetric rates for draft Medium Commercial class
- Rates are designed to be revenue neutral

Scenario	% Revenue Collected in Demand Charge (\$/kW)	% Revenue Collected in Energy Charges (\$/kWh)	Illustrative Distribution Volumetric Rate (\$/kWh)	Illustrative Non-Coincident Demand Charge (\$/kW)	Illustrative On-Peak Demand Charge (\$/kW)
1	100%	0%	\$0.00000	\$7.69	\$12.41
2	50%	50%	\$0.03076	\$3.84	\$6.20
3	0%	100%	\$0.06152	\$0.00	\$0.00

Note: All rates are illustrative and based on preliminary distribution marginal cost study results.

Volumetric Distribution Rate Analysis

Medium Commercial Sample Revenue Impacts

- Using rates on previous slide, illustrative bills calculated based on historical consumption from a sample of M/L C&I accounts under 200 kW
- In total and on average, the sample accounts did not benefit from increasing volumetric rates and reducing demand charges based on their historical usage

Scenario	% Demand (\$/kW)	% Volumetric (\$/kWh)
1	100%	0%
2	50%	50%
3	0%	100%

Monthly	Unit	Median	Mean
Consumption	kWh	17853	20474
Noncoincident Demand	kW	37	44
On-Peak Demand	kW	35	41

Medium Commercial Sample (# customers)

	Scenario 2	Scenario 3
Saw Bill Increase*	4,755	4,786
Saw Bill Decrease*	225	194

*Relative to Scenario 1
n= 4,980

Volumetric Distribution Rate Analysis

Agricultural Customers <= 200 kW

- SDG&E selected Schedule PA-T1 customers with demands <= 200 kW
- n = 135

PA-T1 Customers	Unit	Median	Mean
Monthly TOU Demand	kW	42	58
Monthly Consumption	kWh	10,705	16,756

Volumetric Distribution Rate Analysis

Agricultural Customers <= 200 kW



- SDG&E looked at the status quo & two new scenarios

Scenario	Unit	Scenario 4 Status Quo	Scenario 5	Scenario 6
% TOU Demand Charge	\$/kW	100%	50%	0%
% Energy Charge	\$/kWh	0%	50%	100%
TOU Demand Charge	\$/kW	\$14.94	\$7.47	\$0.00
Energy Charge	\$/kWh	\$0.00000	\$0.03398	\$0.06796

Note: All rates are illustrative and based on preliminary distribution marginal cost study results.

Volumetric Distribution Rate Analysis

Agricultural Customers <= 200 kW Revenue Impacts

- Using rates on previous slide, annual revenue calculated based on consumption from PA-T-1 customer accounts under 200 kW
- Overall, the majority accounts did not benefit from collecting more revenues in volumetric charges

PA-T-1 Customers (% customers)

Compared to Scenario 4	Scenario 5	Scenario 6
Saw Bill Increase	66%	66%
Saw Bill Decrease	34%	34%

Scenario 5 – 50% Energy, 50% Demand

	Illustrative Median Bill Change	Illustrative Average Bill Change	Customer Type
Annual Bill Increases (\$/year)	\$2,955	\$9,075	Customers who saw bill increases
Annual Bill Decreases (\$/year)	\$(1,747)	\$(4,365)	Customers who saw bill decreases

Scenario 6 – 100% Energy

	Illustrative Median Bill Change	Illustrative Average Bill Change	Customer Type
Annual Bill Increases (\$/year)	\$5,909	\$18,150	Customers who saw bill increases
Annual Bill Decreases (\$/year)	\$(3,494)	\$(8,730)	Customers who saw bill decreases

Discussion & Feedback

Next Steps:

- SDG&E will continue to refine its draft proposal
- 2024 GRC Phase 2 be filed December 30, 2022



San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 37042-E

Canceling Revised Cal. P.U.C. Sheet No. 35767-E

SCHEDULE AL-TOU

GENERAL SERVICE - TIME METERED

Sheet 1

APPLICABILITY

Applicable to all metered non-residential customers whose Monthly Maximum Demand equals, exceeds, or is expected to equal or exceed 20 kW. This schedule is not applicable to residential customers, except for those three-phase residential customers taking service on this schedule as of April 12, 2007 who may remain on this schedule while service continues in their name at the same service address. Those three-phase residential customers remaining on this schedule who choose to switch to a residential rate schedule may not return to this schedule. This schedule is optionally available to common use and metered non-residential customers whose Monthly Maximum Demand is less than 20 kW. Any customer whose Maximum Monthly Demand has fallen below 20 kW for three consecutive months may, at their option, elect to continue service under this schedule or be served under any other applicable schedule. This schedule is the utility's standard tariff for commercial and industrial customers with a Monthly Maximum Demand equaling or exceeding 20 kW. Customers on this Schedule whose Monthly Maximum Demand is not less than 20 kW for three consecutive months will also take commodity service on Schedule EECC-CPP-D. Customers on this Schedule whose Monthly Maximum Demand is less than 20 kW for three consecutive months must also take commodity service; they may optionally elect Schedule EECC-CPP-D or they may choose Schedule EECC-TOU-A-P in which case their Utility Distribution Company service rate would be Schedule TOU-A. In addition, customers may exercise the right to opt-out of the applicable dynamic rate (e.g., EECC-CPP-D or EECC-TOU-A-P) to their otherwise applicable Utility Distribution Company and commodity rates. For opt-out provisions, refer to the applicable commodity tariff.

Non-profit group living facilities taking service under this schedule may be eligible for a 20% California Alternate Rates for Energy (CARE) discount on their bill, if such facilities qualify to receive service under the terms and conditions of Schedule E-CARE.

Agricultural Employee Housing Facilities, as defined in Schedule E-CARE, may qualify for a 20% CARE discount on the bill if all eligibility criteria set forth in Form 142-4032 or Form 142-4035 is met.

Small Business Customers, as defined in Rule 1 and not identified by the California Air Resources Board as Emission Intensive, Trade-Exposed Entities (EITE), qualify for a semi-annual California Climate Credit of \$(60.70), which will display as a separate line item per Schedule GHG-ARR.

I

CPUC Decision (D.)17-01-006 and D.17-10-018 permit certain eligible behind-the-meter solar customers to continue billing under grandfathered time-of-use (TOU) period definitions for a specific period of time. Customer eligibility and applicable TOU periods, rates, and conditions for TOU Period Grandfathering are defined in Special Condition 20. All terms and conditions in this Schedule apply to TOU grandfathering customers unless otherwise specified.

TERRITORY

Within the entire territory served by the Utility.

(Continued)

1C7	Issued by	Submitted	Dec 30, 2022
Advice Ltr. No. <u>4129-E</u>	Dan Skopec Senior Vice President Regulatory Affairs	Effective	Jan 1, 2023
Decision No. _____		Resolution No.	E-5217



San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 29356-E

Canceling Revised Cal. P.U.C. Sheet No. 26878-E

SCHEDULE AL-TOU

GENERAL SERVICE - TIME METERED

Sheet 8

SPECIAL CONDITIONS (Continued)

14. **Billing**. A customer's bill is first calculated according to the total rates and conditions listed above. The following adjustments are made depending on the option applicable to the customer:

- UDC Bundled Service Customers** receive supply and delivery services solely from the Utility. The customer's bill is based on the Total Rates set forth above. The EECC component is determined by multiplying the applicable EECC price for this schedule during the last month by the customer's total usage.
- Direct Access (DA) and Community Choice Aggregation (CCA) Customers** purchase energy from a non-utility provider and continue to receive delivery services from the Utility. The bills for a DA and CCA Customer will be calculated as if they were a UDC Bundled Service Customer, then crediting the bill by the amount of the EECC component, as determined for a UDC Bundled Customer, and including the appropriate Cost Responsibility Surcharge (CRS) if applicable.

Nothing in this service schedule prohibits a marketer or broker from negotiating with customers the method by which their customer will pay the CTC charge.

15. **Temporary Service**. When service is turned on for cleaning and/or showing of an unoccupied premise above 20 kW facility, the minimal usage shall be billed under Schedules TOU-A and EECC-TOU-A-P for Utility Distribution Company and commodity services, respectively, until a new tenant begins service. Customers may exercise the right to opt-out of Schedule EECC-TOU-A-P to their otherwise applicable Utility Distribution Company and commodity rates. For opt-out provisions, refer to the EECC-TOU-A-P. Should usage exceed 20 kW at any time for cleaning and/or showing, the customer shall be billed the rates on this schedule and applicable commodity tariff.

16. **Multiple Meters on Single Premise**. When a single corporate entity owns a contiguous property, not divided by any public right of way or property owned by another entity, all within the same governmental agency's jurisdiction, and the Utility has more than one meter serving that property, then, at the customer's request the Utility will bill for the additional fees and conditions set forth in this Special Condition bill all of the usage at some, or all, of the meters as though the whole premise were served through a single meter. As of September 21, 2004, for new customers to be eligible for combined billing, all meters must have the same billing components. These components include but are not limited to Large Customer CTC Adjustment, Large Customer Commodity Credit, Direct Access (DA) Cost Responsibility Surcharge, DA Utility Service Credit, DA Energy Charge and DA Franchise Fee Surcharge. Meter data will be combined for the purpose of billing UDC charges, as listed in the Rates Section of this tariff, but meter data is not allowed to be combined for the purpose of offsetting any charges on SDG&E's commodity rate schedules.. The customer must pay for the utility to install and maintain meters to record consumption in 15 minute intervals for all involved meters. The customer must also pay a distance adjustment fee determined by the utility that is based on the distance between each of the meters involved using normal utility position to determine that distance. The rate applied will be the Distance Adjustment Fee from the Rate Section of this tariff multiplied by 0.121.

(Continued)

8C13

Issued by

Date Filed

Oct 16, 2017

Advice Ltr. No. 3130-E

Dan Skopoc

Effective

Dec 1, 2017

Decision No. D.17-08-030

Vice President
Regulatory Affairs

Resolution No.



San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 61519-E

Canceling Revised Cal. P.U.C. Sheet No. 37102-E

SCHEDULE PA-T-1

Sheet 1

EXPERIMENTAL POWER - AGRICULTURAL - OPTIONAL TIME-OF-USE

APPLICABILITY

This is an optional schedule provided by the utility, on an experimental basis, for the purpose of evaluating time varying rates. Available to agricultural and water pumping customers whose Maximum Monthly Demand is expected to be above 500 kw and who are classified with one or more of the following North American Industry Classification (NAICS) Codes 11111-11116, 11131-11132, 11191-11194, 111191, 111199, 111211, 111219, 111331-111336, 111339, 111411, 111419, 111421, 111422, 111991-111992, 111998, 11212, 11221, 11221-11224, 11239, 11241-11242, 11291, 11299, 112111-112112, 112511-112512, 112519, 22131, or 22132. This schedule is also available to those agricultural and water pumping customers whose maximum demand is less than 500 kw who are installing or have installed facilities or procedures to reduce their annual on-peak energy consumption by 1,500 kwhrs and are also classified by the above NAICS Codes. Service under this schedule is subject to meter availability. Customers on this Schedule whose Monthly Maximum Demand is not less than 200 kW will also take commodity service on Schedule EECC-CPP-D-AG. Customers on this Schedule whose Monthly Maximum Demand is less than 200 kW must also take commodity service; their standard commodity schedule is EECC, they may optionally elect Schedule EECC-CPP-D-AG, or if they are less than 20 kW they may choose Schedule EECC-TOU-PA-P in which case their Utility Distribution Company service rate would be Schedule TOU-PA. In addition, customers may exercise the right to opt-out of the applicable dynamic rate (e.g., EECC-CPP-D-AG or EECC-TOU-PA-P) to their otherwise applicable Utility Distribution Company and commodity rates. For opt-out provisions, refer to the applicable commodity tariff.

Small Business Customers, as defined in Rule 1 and not identified by the California Air Resources Board as Emission Intensive, Trade-Exposed Entities (EITE), qualify for a semi-annual California Climate Credit of \$(78.22), which will display as a separate line item per Schedule GHG-ARR.

R

CPUC Decision (D.)17-01-006 and D.17-10-018 permit certain eligible behind-the-meter solar customers to continue billing under grandfathered time-of-use (TOU) period definitions for a specific period of time. Customer eligibility and applicable TOU periods, rates, and conditions for TOU Period Grandfathering are defined in Special Condition 18. All terms and conditions in this Schedule apply to TOU grandfathering customers unless otherwise specified.

TERRITORY

Within the entire territory served by the Utility.

(Continued)

1C8	Issued by	Submitted	Dec 29, 2023
Advice Ltr. No. <u>4344-E</u>	Dan Skopec Senior Vice President Regulatory Affairs	Effective	Jan 1, 2024
Decision No. _____		Resolution No.	E-5217



San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 33580-E
Canceling Revised Cal. P.U.C. Sheet No. 30550-E

SCHEDULE PA-T-1

Sheet 4

EXPERIMENTAL POWER - AGRICULTURAL - OPTIONAL TIME-OF-USE

Rate Components

The Utility Distribution Company Total Rates (UDC Total) shown above are comprised of the following components (if applicable): (1) Transmission (Trans) Charges, (2) Distribution (Distr) Charges, (3) Public Purpose Program (PPP) Charges, (4) Nuclear Decommissioning (ND) Charge, (5) Ongoing Competition Transition Charges (CTC), (6) Local Generation Charge (LGC), (7) Reliability Services (RS), and (8) Total Rate Adjustment Component (TRAC).

Utility Distribution Company (UDC) Total Rate shown above excludes any applicable commodity charges associated with Schedule EECC, Schedule WF-NBC (Wildfire Fund Non-Bypassable Charge) and Schedule DWR-BC (Department of Water Resources Bond Charge).

Certain Direct Access customers are exempt from the TRAC, as defined in Rule 1 – Definitions.

Franchise Fee Differential

A Franchise Fee Differential of 5.78% will be applied to the monthly billings calculated under this schedule for all customers within the corporate limits of the City of San Diego. Such Franchise Fee Differential shall be so indicated and added as a separate item to bills rendered to such customers.

Time Periods (Note: For Grandfathered TOU Periods, see SC 18)

All time periods listed are applicable to local time.

Energy Charge, Time Periods

TOU Period – Weekdays	Summer (June 1 – Oct 31)	Winter (Nov 1 – May 31)
On-Peak	4:00 p.m. – 9:00 p.m.	4:00 p.m. – 9:00 p.m.
Off-Peak	6:00 a.m. – 4:00 p.m.; 9:00 p.m. – midnight	6:00 a.m. – 4:00 p.m. Excluding 10:00 a.m.–2:00 p.m. in March and April; 9:00 p.m. - midnight
Super-Off-Peak	Midnight – 6:00 a.m.	Midnight – 6:00 a.m. 10:00 a.m. – 2:00 p.m. in March and April

TOU Period – Weekends and Holidays	Summer (June 1 – Oct 31)	Winter (Nov 1 – May 31)
On-Peak	4:00 p.m. – 9:00 p.m.	4:00 p.m. – 9:00 p.m.
Off-Peak	2:00 p.m. – 4:00 p.m.; 9:00 p.m. – midnight	2:00 p.m. – 4:00 p.m. 9:00 p.m. - midnight
Super-Off-Peak	Midnight – 2:00 p.m.	Midnight – 2:00 p.m.

(Continued)

4C8	Issued by Dan Skopoc Vice President Regulatory Affairs	Submitted Sep 30, 2020
Advice Ltr. No. <u>3619-E</u>	Effective Oct 1, 2020	
Decision No. <u>D.20-09-023</u>	Resolution No.	



ENERGY STATEMENT

www.pge.com/MyEnergy

Statement Date: 04/06/2023

Due Date: 04/27/2023

Service For:

Your Account Summary

Questions about your bill?

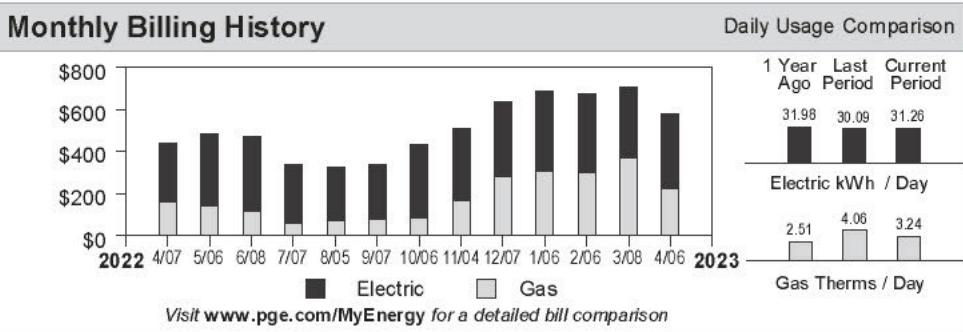
Mon-Fri 7 a.m.-7 p.m.
Saturday 8 a.m.-5 p.m.
Phone: 1-800-743-5000
www.pge.com/MyEnergy

Ways To Pay

www.pge.com/waystopay

Current PG&E Electric Delivery Charges	\$224.11
Peninsula Clean Energy Electric Generation Charges	130.71
Current Gas Charges	228.38

Total Amount Due by 04/27/2023 **\$583.20**



Important Messages

Thank you for your timely payments You have an excellent payment record with us, and we thank you for your prompt payments.

Continued on last page



ENERGY STATEMENT

www.pge.com/MyEnergy

Statement Date: 04/06/2023

Due Date: 04/27/2023

Details of PG&E Electric Delivery Charges

03/02/2023 - 03/30/2023 (29 billing days)

Rate Schedule: E1 X Residential Service

03/02/2023 – 03/30/2023

Your Tier Usage

1

2



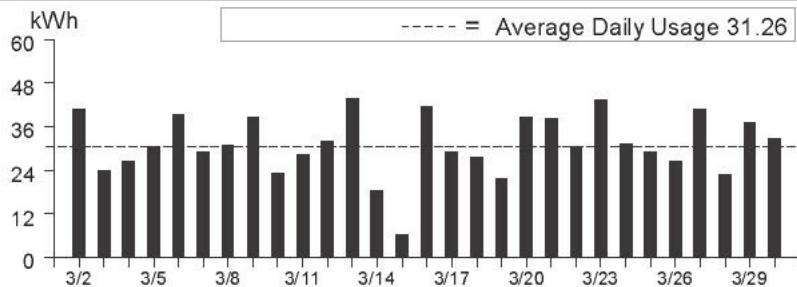
Tier 1 Allowance	281.30	kWh	(29 days x 9.7 kWh/day)	
Tier 1 Usage	281.300000	kWh	@ \$0.34050	\$95.78
Tier 2 Usage	625.298600	kWh	@ \$0.42516	265.85
Generation Credit				-141.56
Power Charge Indifference Adjustment				3.04
Franchise Fee Surcharge				1.00

Total PG&E Electric Delivery Charges **\$224.11**

2016 Vintaged Power Charge Indifference Adjustment



Electric Usage This Period: 906.598600 kWh, 29 billing days





ENERGY STATEMENT

www.pge.com/MyEnergy

Statement Date: 04/06/2023
Due Date: 04/27/2023

Details of Peninsula Clean Energy Electric Generation Charges

03/02/2023 - 03/30/2023 (29 billing days)

03/02/2023 – 03/30/2023

Rate Schedule: E-1

Generation - Total	906.598600 kWh	@ \$0.14388	\$130.44
		Net Charges	130.44
Energy Commission Surcharge			0.27

Peninsula Clean Energy is your community's official electricity provider.
You are receiving clean electricity at low rates!

Total Peninsula Clean Energy Electric Generation Charges **\$130.71**

Service Information

Total Usage 906.598600 kWh

For questions regarding charges on this page, please contact:

PENINSULA CLEAN ENERGY
2075 WOODSIDE RD
REDWOOD CITY CA 94061
1-866-966-0110
PenCleanEnergy.com
info@PeninsulaCleanEnergy.com

Additional Messages

Your city has chosen to receive electricity sourced by Peninsula Clean Energy. Peninsula Clean Energy is a not-for-profit, public agency that sources energy that is least 50% renewable and 100% clean. Its energy generation charge replaces that of PG&E's, but at a lower rate.

Energy **generation** is one component of your overall electric bill. PG&E continues to own and operate the infrastructure and charge for the **delivery** of the electricity. PG&E is responsible for all gas services and gas charges.

Please do not hesitate to contact us at info@PeninsulaCleanEnergy.com or 866-966-0110 or visit our web site at PenCleanEnergy.com if you have any questions.

Peninsula Clean Energy is committed to protecting customer privacy. Learn more at PenCleanEnergy.com/privacy.



ENERGY STATEMENT

www.pge.com/MyEnergy

Statement Date: 04/06/2023

Due Date: 04/27/2023

Details of Gas Charges

03/03/2023 - 03/31/2023 (29 billing days)

03/03/2023 - 03/31/2023

Your Tier Usage

1

2

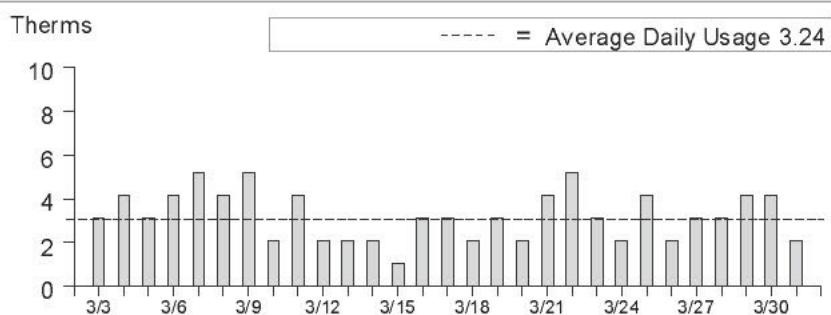
Tier 1 Allowance	42.92 Therms (29 days x 1.48 Therms/day)	
Tier 1 Usage	42.920000 Therms @ \$2.10824	\$90.49
Tier 2 Usage	51.080000 Therms @ \$2.49604	127.50
Gas PPP Surcharge (\$0.11055 /Therm)		10.39

Total Gas Charges **\$228.38**

Gas Procurement Costs (\$/Therm)

03/03/2023 - 03/31/2023 \$0.80230

Gas Usage This Period: 94.000000 Therms, 29 billing days



37



ENERGY STATEMENT

www.pge.com/MyEnergy

Statement Date: 04/06/2023
Due Date: 04/27/2023

Important Messages (continued from page 1)

Energy Savings Assistance Program: provides free home improvements to help keep your home more energy efficient, safe and comfortable. Apply by answering a few simple questions at www.pge.com/energysavings or call **1-800-989-9744**.

Programa Energy Savings Assistance: proporciona mejoras al hogar sin costo para ayudar a que este sea más eficiente en el consumo de energía, más seguro y más cómodo. Solicite respondiendo a unas pocas preguntas simples en www.pge.com/ahorrenergia o llamando al **1-800-989-9744**.

Electric power line safety PG&E cares about your safety. Be aware of your surroundings and keep yourself, tools, equipment and antennas at least 10 feet away from overhead power lines. If you see an electric power line fall to the ground, keep yourself and others away. Call **9-1-1**.

Call 811 before you dig. A common cause of pipeline accidents is damage from digging. If you plan on doing any digging, such as planting a tree or installing a fence, please call **811** at least two working days before you dig. One free call will notify underground utilities to mark the location of underground lines, helping you to plan a safe project.

Your Electric Charges Breakdown (from page 2)

Conservation Incentive	\$20.44
Transmission	48.79
Distribution	119.96
Electric Public Purpose Programs	22.93
Nuclear Decommissioning	1.22
Wildfire Fund Charge	4.80
Recovery Bond Charge	7.23
Recovery Bond Credit	-7.23
Wildfire Hardening Charge	2.30
Competition Transition Charges (CTC)	0.27
Energy Cost Recovery Amount	-0.64
PCIA	3.04
Taxes and Other	1.00
Total Electric Charges	\$224.11

Detail of Current Charges

Gas Service

Rate: GR-Residential

Baseline Allowance: 21 Therms

Meter Number: [REDACTED]

(Next scheduled read date May 3, 2023)

Cycle: 01

Billing Period	Days	Current Reading	-	Previous Reading = Difference	x	Meter Constant	x	Therm Multiplier = Total Therms
03/04/23 - 04/03/23	31	1046		1036	10	1.000	1.027	10

GAS CHARGES

Amount(\$)

Gas Service (Details below) 10 Therms

Baseline	
Therms used	10
Rate/Therm	\$1.56481
Charge	\$15.65

Gas Energy Rate Change This Billing Period:

There was a rate change on day 29 of your Billing Period. Therefore, your charges for the first 28 days were at Rate 1, and the remaining 3 days were at Rate 2.

Gas Energy Charge (Details below) 9 Therms

Usage	
Therms used	9
Rate/Therm	\$.59758
28 of 31 Days	\$5.38

Gas Energy Charge (Details below) 1 Therms

Usage	
Therms used	1
Rate/Therm	\$.43182
3 of 31 Days	\$.43

Total Gas Charges **\$21.46**

TAXES & FEES ON GAS CHARGES

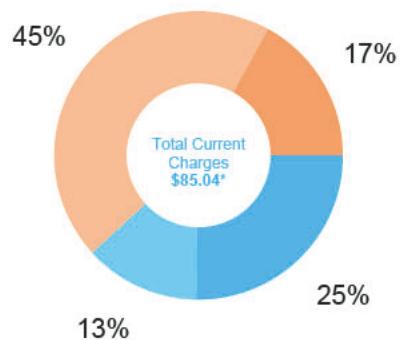
Amount(\$)

City of San Diego Franchise Fee Differential	21.46 x 1.03%	.22
Public Purpose Programs	10 Therms x \$.088810	.89
State Regulatory Fee	10 Therms x \$.003000	.03

Total Taxes & Fees on Gas Charges **\$1.14**

Total Gas Service **\$22.60**

Breakdown of Current Charges



*Credits are not shown on the chart

The total current charges include the following components. Definitions for these terms are shown on page 8 of your bill.

 **Gas Charges**

Gas Service \$21.46

 **Other Charges & Credits (Gas)**

Public Purpose Programs	\$.89
Other	\$.25

 **Electric Charges**

Transmission	\$ 9.47
Distribution	\$ 19.44
Nuclear Decommissioning	\$.01
Competition Transition Charge	\$.21
Local Generation Charge	\$ 1.78
Total Rate Adj. Comp.	\$ 7.20

 **Other Charges & Credits (Electric)**

Public Purpose Programs	\$ 3.28
Wildfire Fund Charge	\$.68
PCIA	\$ 2.18
Other	\$ 3.72

 **CCA Electric Generation Charges**

Total CCA Electric Generation	\$ 14.47
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Total Current Charges **\$85.04**

(Continued on next page)

Detail of Current Charges - Continued

Electric Service

Rate: Standard - DR-Residential Climate Zone: Coastal
 Baseline Allowance: 273 kWh
 Billing Period: 3/4/23 - 4/3/23 Total Days: 31
 Meter Number: (Next scheduled read date May 3, 2023) Cycle: 01
 Meter Constant: 1.000 Billing Voltage Level: Secondary
 Circuit: 0493 *Your circuit is currently not subjected to rotating outage.
 However, this is subject to change without notice.*
 Total Usage: 129 *(Usage based on interval data)*

ELECTRIC CHARGES Amount(\$)

Electricity Delivery (Details below)		129 kWh
WINTER USAGE	0-130% of Baseline	131-400% of Baseline
kWh used	129	0
Rate/kWh	\$.32085	\$.43809
Charge	\$41.39	+ \$.00 = 41.39
Wildfire Fund Charge	129 kWh x \$.00530	.68
Winter Electricity Generation	129 kWh x \$.12630	16.29
Electricity Generation Credit		-16.29
PCIA		2.18
Total Electric Charges		\$44.25

TAXES & FEES ON ELECTRIC CHARGES Amount(\$)

City of San Diego Franchise Fee Differential	41.39 x 5.78%	2.39
Franchise Fee Equivalent Surcharge	16.8 x 6.88%	1.16
State Regulatory Fee	129 kWh x \$.001300	.17
Total Taxes & Fees on Electric Charges		\$3.72
Total Electric Service		\$47.97



(Continued on next page)



ACCOUNT NUMBER [REDACTED]

AMOUNT DUE

\$85.04

DATE MAILED Apr 7, 2023

sdge.com

Page 5 of 8

Detail of Current Charges - Continued**Community Choice Aggregation (CCA) Electric Generation Charges**

Your Electric energy is provided by the following CCA:

SAN DIEGO COMMUNITY POWER Phone: 1-888-382-0169

CCA Account Number: [REDACTED] Service Delivery Point: [REDACTED]

Bill Date: Apr 3, 2023 Billing Period: 3/4/23 - 4/3/23

	Amount(\$)
GENERATION TOTAL WINTER 129 kWh X \$0.10427	13.46
POWER100 129 kWh X \$0.0075	.97
State Surcharge Tax	.04
Total CCA Electric Generation Charges	\$14.47

FOR MORE DETAIL ON YOUR SDPC BILL, CALL US AT 888-382-0169.

YOUR CCA RATE IS DR - 2021 VINTAGE.

Customer privacy is a high priority at San Diego Community Power.

For more information, please visit sdcommunitypower.org/privacy-policy

Total Current Charges	\$85.04
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