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| Exhibit No.: | SDG&E – 11 |
| Proceeding No.: | A.26-02-001 |
| Witness: | Chelsea Haro |
| Date: | November 9, 2026 |

# REBUTTAL TESTIMONY OF

# CHELSEA HARO

# ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

# CHAPTER 5 - IMPLEMENTATION

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

**November 9, 2026**

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# PREPARED REBUTTAL TESTIMONY OF CHELSEA HARO

## I. PURPOSE

The purpose of my rebuttal testimony is to address intervenors' prepared direct testimony served on September 11, 2026, in San Diego Gas & Electric Company's (SDG&E) Application (A.) 26-02-001. Specifically, my rebuttal testimony will address the following contentions made in intervenor testimony:

- Whether Net Energy Metering (NEM)/Net Billing Tariff (NBT) customers should be included in the proposed demand flexibility rates (Proposed DF Rates);
- Whether SDG&E's proposed billing costs are reasonable;
- Whether there is a cost shift from participating to non-participating customers when recovering costs through Public Purpose Program (PPP).

SDG&E's failure to address any individual issue in this rebuttal testimony does not imply agreement by SDG&E with any argument, position, or proposal asserted by parties.

## II. CONCURRENT PARTICIPATION IN NEM/NBT AND THE PROPOSED DF RATES

San Diego Community Power (SDCP) and Clean Energy Alliance (CEA) (collectively, the SD CCAs) testimony argues that the lack of concurrent eligibility in the Proposed DF Rates and NEM/NBT rates is "shortsighted" and that "NEM and NBT customers are likely among the customers groups best positioned to respond to DF pricing signals" and may be well positioned to shift usage and respond to hourly pricing.[1] However, the SD CCAs fail to address the

[1] Prepared Direct Testimony on Behalf of San Diego Community Power and Clean Energy Alliance in San Diego Gas and Electric Company's Application for Approval of Demand Flexibility Rates (September 11, 2026) (SD CCA Prepared Direct Testimony) at 129 ("SDG&E's Application currently excludes such customers, but this is shortsighted." (citation omitted)).

operational, billing complexities and associated costs that will also result from the inclusion of concurrent NEM/NBT and DR rate participation.

The characteristics of NEM/NBT customers will likely limit the load response being sought from participants in Proposed DF Rates. NEM/NBT customers without battery storage are not likely to benefit from a Proposed DF Rate because high-priced system peak hours, from 4:00 to 9:00 p.m., generally coincide with declining solar production, resulting in greater reliance on the grid, and solar alone is not set up to benefit from dynamic pricing.[2] In a report published by Lawrence Berkeley National Laboratory (LBNL), it was modeled that non-NEM customers generally benefited from a dynamic pricing model, while NEM customers tended to experience higher bills due in part to reduced export compensation and the timing of grid purchases.[3] The report also found that because NEM/NBT customers receive more favorable treatment under their current rate design, particularly for exported energy, they may be disinclined to move to a DF rate.[4]

SDG&E's analysis supports the findings in the LBNL report that NEM/NBT customers are not likely to benefit from DF rates. In comparing SDG&E's bill analysis that include NEM

[2] *California Price Response Potential Study, Exploring the potential impacts of widespread load response to hourly dynamic prices across six key end uses*, Lawrence Berkeley National Laboratory (January 4, 2026) at 62, available at https://escholarship.org/content/qt20b4f7qs/qt20b4f7qs.pdf.

[3] *Potential Impacts of Dynamic Electricity Pricing in California: Load Shape and Customer Bill Impacts Under Elastic Customer Response*, Lawrence Berkeley National Laboratory (July 14, 2025) at 47, available at https://www.osti.gov/servlets/purl/2574291.

[4] *California Price Response Potential Study, Exploring the potential impacts of widespread load response to hourly dynamic prices across six key end uses*, Lawrence Berkeley National Laboratory (January 4, 2026) at 62, available at https://escholarship.org/content/qt20b4f7qs/qt20b4f7qs.pdf.

customers[5] with analysis excluding exporting NEM customers,[6] customers in the population without exports are more likely to benefit from DF rates than the population with exports.[7] While this points to NEM/NBT customers not benefiting from DF rates, it also highlights the complexity in analyzing a subset of customers on rates that are not revenue neutral. In 2024, NEM/NBT customers create a cost shift for non-participating customers of approximately $7 billion across the California investor-owned utilities,[8] resulting in a cost shift that amounts to approximately 12-19% of the average non-participating customer bill.[9] This cost shift increased to $8 billion in 2025 which accounts for 12-20% of the average non-participating customer bill.[10] The Commission has identified rooftop solar subsidies as a primary driver of increasing electric rates for customers without rooftop solar.[11] Given SDG&E's bill analysis and ongoing affordability concerns, SDG&E believes that directing significantly more costs to permit concurrent eligibility in NEM/NBT and the Proposed DF Rates is not the best use of ratepayer funds at this time. As the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) recognizes in its testimony, NEM billing already requires complicated, multi-

[5] Attachment A hereto, workpaper in support of SDG&E Revised Chapter 5 Implementation Testimony, workpaper "Rev2_RTPImport_BillCalc_Proposed_Breakout".

[6] *See* Attachment B hereto, SDG&E's Supplemental Response to Cal Advocates DR 18, Q 1b workpaper "RTPImport_BillCalc_Proposed_NonNEM_RES"

[7] *See* Attachment C hereto, RTPImport_BillCalc_Proposed_NEMvsNon-NEM_Workpaper (comparing NEM analysis with NEM analysis excluding exporters).

[8] *2025 Senate Bill 695 Report, Report to the Governor and Legislature on Actions to Limit Utility Cost and Rate Increases Pursuant to Public Utilities Code Section 913.1* (September 2025) at 43, available at https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2025/2025-sb-695-report_093025.pdf.

[9] *Id.* at 47.

[10] *2026 Senate Bill 695 Report, Report to the Governor and Legislature on Actions to Limit Utility Cost and Rate Increases Pursuant to Public Utilities Code Section 913.1* (October 2026) at 15 – 18, available at 2026-sb-695-report---final.pdf.

[11] *Id.* at 2.

step inputs and the addition of DF rates is potentially costly as it will further complicate administration of the rate.[12]

Moreover, the experience of the other utilities with their real-time pricing pilots does not support inclusion of concurrent participation by NEM/NBT customers. For instance, although Southern California Edison Company (SCE) reports that NEM customers comprise about half of the participants in its expanded dynamic rate pilot, its findings do not establish that participation by these customers produced meaningful load shifting.[13] Pacific Gas and Electric Company's (PG&E) midterm results for its extended pilot did not include data specific to NEM/NBT customers, but their recent testimony on their Real Time Pricing (RTP) pilot argues, as SDG&E has concluded, that residential solar customers are not incentivized to participate due to the possibility that participation will reduce their export compensation.[14]

Given the considerations discussed above, expanding eligibility for NEM/NBT customers in demand flexibility rates, or allocating additional funds to facilitate their participation, does not appear justified at this time. Accordingly, SDG&E recommends that NEM/NBT customers not be included in the Proposed DF Rates unless further evidence demonstrates that their inclusion

[12] Cal Advocates Opening Testimony in Response to SDG&E's Dynamic Rate Application (A.) 26-02-001, Chapter 2, Implementation, Marketing, and Evaluations (September 11, 2026) , Section II.A.,("… since conjunctive billing arrangements and NEM-suite rates already involve complicated multi-step billing inputs, implementation of the proposed dynamic rate that can work with these arrangements would be complex and costly, and are therefore justifiably excluded." (internal footnotes omitted)).

[13] *Mid-Term Evaluation of Southern California Edison's Expanded Dynamic Rate Pilot*, Christensen Associates (August 3, 2026) at 30, Figure 2.13, ("Nearly half are NEM customers"), available at https://sempra.sharepoint.com/sites/RegulrateProc/_layouts/15/viewer.aspx?sourcedoc={570fad1a-5a74-4a3c-ad43-a9d0719773b6} at 95 ("Overall, the evidence of meaningful price responsiveness is limited and concentrated within a single customer segment: residential customers with level 2 EV chargers.").

[14] A.24-09-014, PG&E 2023 General Rate Case Phase II Supplemental Testimony, Exhibit (PG&E-5) Real-Time Pricing Proposal (October 29, 2025) at 4-11 ("NEM and NBT may present particular challenges for incenting load response from residential solar customers if RTP's rate design reduces their solar export compensation."), available at https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2409014/8693/585486364.pdf.

would provide meaningful system benefits that justify the associated implementation costs and billing complexities.

Finally, the SD CCAs' argue that the Commission should require evaluation of the feasibility of NEM/NBT participation in a DF rate.[15] SDG&E recommends that the Commission deny this request. Such a study would require SDG&E's billing team to develop a method to compute and compare NEM and Proposed DF Rate bills, a time-intensive and costly endeavor due to the complexity of NEM and NBT billing. SDG&E reiterates that implementation of concurrent enrollment of these customers in both NEM and the Proposed DF Rates will add significant complication and costs from an ME&O and billing perspective, and, as discussed above, given that these customers are unlikely to benefit from a DF rate as compared to their current NEM/NBT rate, SDG&E strongly recommends that the Commission not require concurrent eligibility at this time.[16]

## III. BILLING COSTS

Cal Advocate's assertion that SDG&E has failed to demonstrate that its proposed implementation costs are reasonable overlooks the scope of work underlying SDG&E's cost estimates and the measures SDG&E has taken to minimize incremental costs.[17] SDG&E's billing-system estimate reflects the specific activities necessary to implement the Proposed DF Rates, including requirements development, rate configuration and validation, enrollment and customer communication functionality, detailed usage and charge presentation, end-to-end

[15] SD CCA Prepared Direct Testimony at 129.

[16] Second Revised Direct Testimony of Chelsea Haro on Behalf of SDG&E, Chapter 5 – Implementation (June 17, 2026) at 3.

[17] Cal Advocates Opening Testimony in Response to SDG&E's Dynamic Rate Application (A.) 26-02-001, Chapter 3, Revenue Requirement and Cost Recovery (September 11, 2026) (Cal Advocates Opening Testimony, Chapter 3) at 3.

testing, deployment and stabilization, and necessary pricing and reporting updates as discussed in SDG&E's Second Revised Testimony at Chapter 5.[18] SDG&E has also proposed to leverage existing billing-system functionality where it is technically feasible to reduce the need for additional development and integration. The use of existing functionality does not eliminate the need for incremental implementation work; rather, it demonstrates that SDG&E has sought to limit implementation costs while developing the capabilities necessary to implement the Proposed DF Rates.

Moreover, SDG&E's requested revenue requirement is derived from the forecasted implementation costs using established revenue-requirement methodologies, as further discussed in Chapter 9 of SDG&E's direct testimony.[19] SDG&E and Cal Advocates also discussed this issue during a follow-up meet and confer on October 1, 2026. The fact that SDG&E's approximately $9.5 million implementation-cost forecast produces an approximately $11.3 million revenue requirement does not indicate that the costs are unsupported or unreasonable. SDG&E was ordered to develop and propose these DF rates per (D) 25-08-049, SDG&E has sought to put forth the best and most affordable rate design.

## IV. COST RECOVERY

The SD CCAs assert that "SDG&E's proposed cost recovery mechanism risks imposing Proposed DF rate implementation costs on nonparticipating customers without demonstrating a commensurate benefit."[20] This assertion does not consider the evidence that a well-designed DF

[18] Second Revised Direct Testimony of Chelsea Haro on Behalf of SDG&E, Chapter 5 – Implementation (June 17, 2026) at 6-9.

[19] Prepared Direct Testimony of DJ Scott on Behalf of SDG&E, Chapter 9 – Revenue Requirement (February 2, 2026) at 2, n.2.

[20] SD CCA Prepared Direct Testimony at 78.

rate produces system benefits that extend to both participating and non-participating customers.[21] These benefits are a key driver of the State's policy goals and of the development of this rate, and the Commission should therefore reject the SD CCAs' argument.

Moreover, SDG&E's proposal includes both commodity and non-commodity components, providing the mechanism needed for departed load customers, including Direct Access (DA) and CCA customers, to participate. Departed load customer participation in a commodity component, however, depends on the availability of a commodity DF rate from their service provider, not on the Proposed DF Rates. This conclusion is consistent with Cal Advocates' testimony, which recognizes that whether the full benefits of a DF rate are available to CCA customers is dependent on the CCAs' decision to participate: "The amount of benefits that San Diego Community Power and Clean Energy Alliance (Joint CCAs) customers can directly receive depends on whether the Joint CCAs choose to participate."[22] The SD CCAs' undefined standard of "meaningful participation,"[23] does not establish whether they are capable of developing and offering their own corresponding DF generation rate.

As explained in the Energy Division's White Paper and Staff proposal, "[t]here is a direct link between the CalFUSE price signal and the marginal cost of electricity, which ensures unintended cost shift from specific program/technology participants (responding to the dynamic price) to non-participants is minimized."[24] When properly designed, DF rates reduce annual bills

[21] Second Revised Prepared Testimony of Jeff DeTuri on Behalf of SDG&E, Chapter 4 - Customer Protection (June 17, 202) at 10, "Rate and Revenue Impacts for Participants and Non-Participants" and Prepared Direct Testimony of Jeff DeTuri on Behalf of SDG&E, Chapter 1 – Policy (February 2, 2026) at 17.

[22] Cal Advocates Opening Testimony, Chapter 3 at 17.

[23] *See, e.g.,* SD CCA Prepared Direct Testimony at 57.

[24] *Advanced Strategies for Demand Flexibility Management and Customer DER Compensation, Energy Division White Paper and Staff Proposal,* (June 22, 2022) at 87, available at https://www.cpuc.ca.gov/-

for both participants and non-participants as demonstrated by PNNL's DSO+T study.[25] Cal Advocates similarly recognizes that DF rates can provide benefits beyond participating customers, stating, "If the Commission adopts a dynamic rate in this proceeding, and the intended participant benefits materialize, unbundled participants taking generation service from CCAs will also reap those benefits."[26]

LBNL's analysis provides additional evidence of the broader system benefits associated with DF rates. Their study modeled several scenarios, including one that demonstrates "…lower electricity costs for all customers, even those who may not have the ability to participate,"[27] and another which "…[t]he model results show that customer response to dynamic-only tariffs would flatten the system net load, and significantly reduce peak net loads on the grid."[28] The available studies provide a reasonable basis to conclude that a properly designed dynamic rate can generate system benefits shared by participating and non-participating customers.

Additionally, the SD CCAs' concerns regarding access to timely interval meter data do not demonstrate that CCA customers are unable to participate in DF rates or that the proposed rate framework prevents CCA participation.[29] Rather, the concerns raised by the SD CCAs primarily relate to their ability to evaluate customer response, forecast customer load, support

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/media/cpuc-website/divisions/energy-division/documents/demand-response/demand-response-workshops/advanced-der---demand-flexibility-management/ed-white-paper---advanced-strategies-for-demand-flexibility-management.pdf.

[25] *Id.*

[26] Cal Advocates Opening Testimony, Chapter 3 at 17.

[27] *California Price Response Potential Study, Exploring the potential impacts of widespread load response to hourly dynamic prices across six key end uses*, Lawrence Berkeley National Laboratory (January 4, 2026) at 38, available at https://escholarship.org/content/qt20b4f7qs/qt20b4f7qs.pdf.

[28] *Potential Impacts of Dynamic Electricity Pricing in California: Load Shape and Customer Bill Impacts Under Elastic Customer Response*, Lawrence Berkeley National Laboratory (July 14, 2025) at 49, available at https://www.osti.gov/servlets/purl/2574291.

[29] SD CCA Prepared Direct Testimony at 81.

customers, and incorporate flexible resources into their operational planning after a dynamic rate is implemented.[30] This is distinct from whether a dynamic rate can be designed or offered, as reflected in the SD CCA's own testimony.[31] Therefore, the SD CCA's data-access concerns do not provide a basis for rejecting PPP cost recovery, and allocating costs for the Proposed DF Rates through PPP represents a reasonable and appropriate cost-recovery approach.

## V. CONCLUSION

For the reasons discussed above, the Commission should approve SDG&E's Proposed DF Rates and recovery of the associated implementation costs through the PPP rate component. The proposed framework provides a pathway for both bundled and unbundled customers to participate and is designed to deliver system benefits that extend beyond participating customers. The SD CCAs' concerns regarding timely meter data do not establish that their customers are precluded from participation or from receiving those broader benefits. At the same time, expanding eligibility to NEM/NBT customers is not warranted at this stage absent further evidence that the incremental system benefits would justify the additional implementation costs and billing complexities. Accordingly, SDG&E's Proposed DF Rates represent a reasonable approach to advancing demand flexibility while accounting for implementation feasibility, customer affordability, and benefits to the broader system.

This concludes my rebuttal testimony.

[30] *See, e.g.,* Attachment D hereto, SD CCAs Response to SDG&E DR 02, Response 2 at 4.

[31] SD CCA Prepared Direct Testimony at 59 ("The facts of the matter are such that without timely energy usage data, the SD CCAs can still communicate dynamic prices…").

**ATTACHMENT A**

**Rev2_RTPImport_BillCalc_Proposed_Breakout Workpaper**

Due to the large size, this attachment is being sent electronically only.

**ATTACHMENT B**

**SDG&E's Supplemental Response to Cal Advocates DR 18,**

**Q 1b workpaper "RTPImport_BillCalc_Proposed_NonNEM_RES**

Due to the large size, this attachment is being sent electronically only.

**CAL ADVOCATES DATA REQUEST 18**
**DEMAND FLEXIBLE RATE APPLICATION – A.26-02-001**
**SDG&E SUPPLEMENTAL RESPONSE**
**DATE RECEIVED: JUNE 5, 2026**
**DATE RESPONDED: JUNE 26, 2026**

## OBJECTIONS TO INSTRUCTIONS

1. SDG&E objects to the instructions to the extent they seek a verified response. SDG&E is providing responses in good faith and that it believes to be true and correct. SDG&E is not aware of any obligation to provide a verification to a data request.

2. SDG&E objects to the instructions to the extent they purport to require the individual(s) responsible for providing the response and/or designate the proper witness to cross-examine concerning the response. The responses reflect SDG&E's response as a Company to the requests and not the work of any one individual.

3. SDG&E objects to the instructions to the extent they state that the requests are ongoing in nature and require subsequent, supplemental information.

4. SDG&E objects to the instructions to the extent they request responses in multiple formats.

5. SDG&E objects to the instructions to the extent they provide shortened timelines for objections and requests for clarification.

## EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.

2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.

3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.

4. These responses are made solely for the purpose of this proceeding and for no other purpose.

Subject to the foregoing general objections and express reservations, SDG&E responds as follows:

**DATA REQUESTS**
**SUBJECT: CUSTOMER PROTECTIONS**

**QUESTION 1b:**

If SDG&E considers customers with solar exporting electricity to the grid across the consumption profiles used to develop rate and bill impacts in this workpaper, please provide a version of the residential bill impacts with customer protections for only non-exporting customers.

**SDG&E SUPPLEMENTAL RESPONSE TO QUESTION 1b:**

Please refer to the workpapers "RTPImport_BillCalc_Present_NonNEM_RES" and "RTPImport_BillCalc_Proposed_NonNEM_RES" which include non-exporting customers. It is important to note that not all solar customers export energy in a given day, month, or year. Because the question does not specify which scenarios should be excluded, the re-run removes any customer who exports at least once during the year.

**ATTACHMENT C**

**RTPImport_BillCalc_Proposed_NEMvsNon-NEM_Workpaper**

Due to the large size, this attachment is being sent electronically only.

# ATTACHMENT D

## SD CCAs Response to SDG&E DR 02

**San Diego Community Power and Clean Energy Alliance Response to**
**San Diego Gas and Electric Company Data Request No. SDGE-CEA-DR-02**
**Application 26-02-001**

| | |
|---|---|
| Requesting Party: | San Diego Gas and Electric Company ("SDG&E") |
| Responding Parties: | San Diego Community Power ("SDCP" or "Community Power") and Clean Energy Alliance ("CEA," and, collectively, the "SD CCAs") |
| Requester: | Tyler Kirchhoff, Regulatory Case Manager<br>Phone: 619-676-3898<br>E-Mail: tmkirch2@sdge.com<br><br>Rebecca Hansson, Senior Counsel<br>Phone: 619-550-7069<br>E-Mail: rhansson@sdge.com |
| Responder: | Sheridan Pauker, Partner<br>Keyes & Fox LLP<br>Phone: (510) 314-8202<br>E-mail: spauker@keyesfox.com<br>Counsel for SD CCAs |
| Request Date: | September 30, 2026 |
| Date Sent: | October 14, 2026 |

## GENERAL OBJECTIONS

1. The SD CCAs object to the instructions and definitions in SDGE-CEA-DR-02 (the "Requests") to the extent they supplement, modify, or exceed the scope of the requirements of Article 10 of the Commission's Rules of Practice and Procedure, applicable Assigned Commissioner or Administrative Law Judge's rulings, or the procedural schedule governing this proceeding. The SD CCAs do not waive, and expressly preserve, all rights to limit their responses to information that is properly discoverable under Commission Rules.

2. The SD CCAs object to the Requests to the extent they seek information or documents protected as a confidential attorney-client communication and/or attorney work product or are otherwise confidential, proprietary or sensitive data, trade secrets and information.

3. The SD CCAs object to the Requests to the extent they request legal conclusions, legal contentions, strategic judgments, or internal deliberative analyses or opinions rather than facts, and are therefore not a proper subject for discovery and may be protected as a confidential attorney-client communication or by the attorney work product doctrine.

4. The SD CCAs object to the Requests to the extent they are overbroad, unduly burdensome, or disproportionate to the needs of this proceeding, including Requests that seek information not reasonably calculated to lead to the admission of discoverable evidence or that would require unreasonable effort or expense to respond.

5. The SD CCAs object to the Requests as unduly burdensome to the extent they seek information that has already been provided in the SD CCAs' testimony on the same subject.

6. The SD CCAs object to the Request as unduly burdensome to the extent they require the SD CCAs to compile and produce materials that are already publicly reported and equally accessible to the requesting party.

7. The SD CCAs object to the Requests to the extent they impose obligations that exceed Commission procedural requirements, including, but not limited to, requests that:

a. Require the creation of new analyses, studies, summaries, or compilations not otherwise maintained in the ordinary course of business;

b. Seek narrative explanations, justifications, or legal analyses beyond what is required by Commission Rules; and

c. Demand a level of detail or documentation not contemplated by the Commission's discovery framework.

8. The SD CCAs object to the Requests to the extent they are vague, ambiguous, or insufficiently specific as to subject matter, time period, or definitions, such that the SD CCAs cannot reasonably determine what information is requested.

By responding to any of these Requests, the SD CCAs do not concede the relevance, materiality, or admissibility of any information provided, nor do they waive any objection as to any other use of such information in this proceeding.

## PRELIMINARY STATEMENT

The SD CCAs' responses to the Requests are made to the best of their present knowledge, information, and belief and subject to and limited by the objections herein. The SD CCAs have not concluded its investigation of the facts related to this proceeding. The following responses are, at all times, subject to such additional or different information as discovery or further investigation may disclose. Therefore, the following responses and objections are given without prejudice to the SD CCAs' right to rely on subsequently discovered or recalled information and evidence. The SD CCAs specifically reserve the right to make use of, or to introduce at any hearing, information and/or document responsive to the following requests that is discovered or recalled subsequent to the date of these responses, including, without limitation, any information or documents obtained in discovery or by further investigation of this matter. Capitalized terms not defined herein are defined in the Requests, the Application or SDG&E's testimony served in this Application.

## REQUESTS & RESPONSES

**Request 1**

**Do the SD CCAs plan to design LMS-compliant demand flexibility rates (i.e. commodity rates)?**

> **a. If not, please describe all the reasons why the SD CCAs do not plan to design LMS-compliant demand flexibility rates.**
>
> **b. If yes, when do the SD CCAs plan to offer their customers LMS-compliant demand flexibility rates?**

**Response 1**

The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been requested and provided in the SD CCAs' prior discovery responses and/or testimony on the same subject. The SD CCAs object to this Request to the extent it requests legal conclusions, legal positions, strategic judgments, or internal deliberative analyses or opinions regarding the SD CCAs' compliance with applicable law and regulations relating to the LMS, rather than facts, and are therefore not a proper subject for discovery and may be protected as a confidential attorney-client communication or by the attorney work product doctrine. The SD CCAs further object to this Request to the extent it seeks information or documents protected as a confidential attorney-client communication and/or attorney work product or are otherwise confidential, proprietary or sensitive data, trade secrets and information. The SD CCAs further object to this request as unduly burdensome to the extent it seeks production of information that is already publicly reported and equally accessible to the requesting party.

Subject to and without waiving these objections, the SD CCAs respond as follows:

The SD CCAs refer SDG&E to their response to Data Request No. SDGE-CEA-DR-01, Response 1, and their intervenor testimony filed on September 11, 2026. As noted therein, the SD CCAs are actively engaged in A.26-02-001 to advocate on behalf of CCA customers with respect to the Proposed DF Rates. The SD CCAs seek to collaborate with SDG&E to resolve the SD CCAs' concerns regarding the Application as expressed in their Protest and forthcoming testimony in a satisfactory manner that serves their customers' interests.

Community Power has deferred the development of demand flexibility rates until foundational issues such as access to sufficiently timely and granular interval data, optimal coordination with SDG&E on customer education and outreach, collaboration with SDG&E on effective implementation, and others are in place.

Clean Energy Alliance similarly will defer the development of demand flexibility rates until the barriers and issues raised by the SD CCAs in their Protest and intervenor testimony in this case are addressed and CEA then has an opportunity to evaluate cost effectiveness, equity, technological feasibility, benefits to the grid, and benefits to customers of marginal cost-based rates for each customer class per the requirements of the LMS regulations. As discussed

extensively in the SD CCAs' intervenor testimony, data access and meaningful collaboration with SDG&E are necessary to inform CEA's evaluation of marginal cost-based rates as required under the LMS regulations. CEA is currently evaluating potential revisions to its LMS Plan to clarify the current barriers to implementation of marginal cost-based rates and its intention to reevaluate such rates following the outcome of the issues raised by the SD CCAs in this Application proceeding.

**Request 2**

**How do the SD CCAs plan to use customer interval meter data for purposes of any future demand flexibility rate?**

**Response 2**

The SD CCAs object to this request as unduly burdensome to the extent it seeks production of information that is already publicly reported and equally accessible to the requesting party. The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been provided in the SD CCAs' testimony on the same subject.

Subject to and without waiving these objections, the SD CCAs respond as a courtesy as follows:

The SD CCAs refer SDG&E to their response to Data Request No. SDGE-CEA-DR-01, Response 3, and their intervenor testimony, Chapter III(A) and (B), in A.26-02-001, filed on September 11, 2026. As discussed extensively and in detail in that testimony already provided, the SD CCAs view customer interval meter data as essential to implementation and ongoing evaluation of any demand flexibility rate. Interval data would support customer outreach and education. For example, when generation prices remain unusually high or low for multiple days, timely interval data could help identify how participating customers' usage interacts with those price signals. The SD CCAs would use that information to alert customers to sustained price conditions within an actionable timeframe, explain the potential bill impacts, and provide information regarding when customers may consider shifting their usage. This type of timely customer engagement is important to helping customers understand and respond to a demand flexibility rate. Without sufficiently timely data, customers may be more exposed to price shocks and market volatility, creating a risk of adverse customer experiences with demand flexibility rates. The SD CCAs' testimony also explains in detail how timelier access to interval data would improve their load forecasting processes. Interval meter data would support the ongoing administration and evaluation of a future demand flexibility rate. More timely data would allow the SD CCAs to react to real-time market conditions and customer usage and provide feedback to participating customers in an actionable manner.

**Request 3**

**The SD CCAs state in their March 5, 2026 protest in the instant proceeding that "[t]he SD CCAs must ensure that they and their customers have access to granular, real-time interval usage data so that the CCAs, as load-serving entities, and their customers, which may take service under the Proposed DF Rates, can make the most of the state-mandated**

**DF programs."**[11]

**Response 3**

The SD CCAs object to each of the sub-questions to Request 3 below as unduly burdensome as they seek production of information that is already publicly reported and equally accessible to the requesting party. The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been provided in The SD CCAs' testimony on the same subject. The SD CCAs refer SDG&E to their intervenor testimony filed on September 11, 2026, which addressed these questions in detail.

Subject to and without waiving these objections, which apply to each of the sub-questions to Request 3 below, the SD CCAs respond as a courtesy as follows:

**Request 3(a)**

**a. What do the SD CCAs consider "real-time" in this context?**

**Response 3(a)**

The SD CCAs refer SDG&E to their intervenor testimony filed on September 11, 2026, which defined "near real time" several times, including at pages 9:4-5, 16:1-2 and 36:17 – 37:3.

**Request 3(b)**

**b. Using the SD CCAs definition of "real-time," how do the SD CCAs anticipate using the "granular, real-time interval usage data" to "make the most of the state-mandated programs"?**

**Response 3(b)**

The SD CCAs refer SDG&E to their intervenor testimony filed on September 11, 2026, Chapter III, Sections (A) and (B), including, but not limited to, pages 34:8 – 35:2, 36:9-14; 38:9 - 40:4, 40:17 – 43:9.

**Request 3(c)**

**c. Assuming the SD CCAs receive "granular, real-time interval usage data" (using the SD CCAs definition of "real-time" as described above), please describe how the SD CCAs plan to use the data to design a DF commodity rate.**

[1] SD CCA Protest at 3.

**Response 3(c)**

See Response to Request 3(b).

**Request 3(d)**

**d. Assuming the SD CCAs receive "granular, real-time interval usage data" (using the SD CCAs definition of "real-time" as described above), please describe how the SD CCAs plan to use the data to implement a DF commodity rate.**

**Response 3(d)**

See Response to Request 3(b).

**Request 3(e)**

**e. Assuming the SD CCAs receive "granular, real-time interval usage data" (using the SD CCAs definition of "real-time" as described above), please describe how the SD CCAs plan to use the data to provide a DF commodity rate on an on-going basis for SD CCA customers post-implementation.**

**Response 3(e)**

See Response to Request 3(b).

**Request 3(f)**

**f. Assuming the SD CCAs receive "granular, real-time interval usage data" (using the SD CCAs' definition of "real-time" as described above), please describe how the SD CCAs plan to use "real-time" customer interval usage data to assist customers with understanding their rates and managing their load.**

**Response 3(f)**

See Response to Request 3(b).

**Request 4**

**The SD CCAs state in their March 5, 2026 protest in the instant proceeding that the "lack of timely access to sufficient customer energy usage data meaningfully hinders CCA customer participation . . ."[2]**

[2] SD CCA Protest at 9.

a. **Please describe the reasons why lack of timely access to sufficient customer energy usage data would hinder CCA participation in a DF rate?**

b. **Please specify which of these reasons would meaningfully hinder CCA customer participation in a DF rate?**

**Response 4**

The SD CCAs object to this request and each of its subquestions as unduly burdensome as they seek production of information that is already publicly reported and equally accessible to the requesting party. The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been provided in The SD CCAs' testimony on the same subject.

Subject to and without waiving these objections, the SD CCAs respond as a courtesy as follows:

The SD CCAs refer SDG&E to their intervenor testimony filed on September 11, 2026, which addressed these questions in detail in Chapter III(A), (B) and (C)(3).

**Request 5**

**The SD CCAs' September 11, 2026 prepared direct testimony in this proceeding at page 30 states: "In the absence of timely customer usage information, the SD CCAs are unable to effectively assist customers in managing usage during periods of elevated prices."**

a. **assuming access to "timely customer usage information," please state the actions the SD CCAs intend to take to assist customers on a CCA-offered DF rate.**

**Response 5**

The SD CCAs object to this request as unduly burdensome as it seeks production of information that is already publicly reported and equally accessible to the requesting party. The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been provided in The SD CCAs' testimony on the same subject.

Subject to and without waiving these objections, the SD CCAs respond as a courtesy as follows:

See Response to Request 3(b) above.

**Request 6**

**The SD CCAs' September 11, 2026 prepared direct testimony in this proceeding at page 59 states: "The facts of the matter are such that without timely energy usage data, the SD CCAs can still communicate dynamic prices, but more than likely they will end up being incorrect signals to customers because CCAs are required to forecast what their marginal daily costs will be based on their day-ahead load." Do the SD CCAs plan to design an LMS-compliant DF generation rate with hourly rates based on their day-ahead load forecast?**

**a. If the SD CCAs' response is "yes," why are the SD CCAs planning to design their rate in that manner rather than using market rates?**
**Response: N/A**

**b. If the SD CCAs' response is "no," what do the SD CCAs mean when they say that "without timely energy usage data" they will likely end up sending "incorrect signals to customers"?**

**Response 6**

The SD CCAs object to this request as asked and answered to the extent it seeks information that has already been requested and provided in the SD CCAs' prior discovery responses and/or testimony on the same subject. The SD CCAs object to this Request to the extent it requests legal conclusions, legal positions, strategic judgments, or internal deliberative analyses or opinions regarding the SD CCAs' compliance with applicable law and regulations relating to the LMS, rather than facts, and are therefore not a proper subject for discovery and may be protected as a confidential attorney-client communication or by the attorney work product doctrine. The SD CCAs further object to this Request to the extent it seeks information or documents protected as a confidential attorney-client communication and/or attorney work product or are otherwise confidential, proprietary or sensitive data, trade secrets and information. The SD CCAs further object to this request as unduly burdensome to the extent it seeks production of information that is already publicly reported and equally accessible to the requesting party.

Subject to and without waiving these objections, the SD CCAs respond as follows:

The SD CCAs refer SDG&E to their response to Data Request No. SDGE-CEA-DR-01, Response 1, their intervenor testimony filed on September 11, 2026, in particular pages 14:4-6, 41:20 – 43:9, and 59:3-19, and their Response to Request 1, above.

As discussed in detail in the referenced pages in the SD CCAs' testimony and elsewhere in such testimony, in the absence of timely energy usage data, the SD CCAs' day-ahead load forecast is less accurate, resulting in over- and under-procurement relative to actual grid conditions. Load forecast and procurement errors would lead to rates that may be mis-aligned to actual grid conditions and thus marginal-costs. Without timely energy data, forecast errors increase and thus the efficacy of dynamic pricing signals is reduced.

**END OF RESPONSE**