

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's
Own Motion to Conduct a Comprehensive
Examination of Investor Owned Electric Utilities'
Residential Rate Structures, the Transition to Time
Varying and Dynamic Rates, and Other Statutory
Obligations.

Rulemaking 12-06-013
(Filed June 21, 2012)

REPLY COMMENTS OF THE UTILITY REFORM NETWORK
ON RATE PROPOSALS



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**REPLY COMMENTS OF THE UTILITY REFORM NETWORK
ON RATE DESIGN PROPOSALS**

Pursuant to the September 20, 2012 ruling of Assigned Commissioner Peevey and ALJ Sullivan, The Utility Reform Network (TURN) hereby submits these reply comments to the opening comments of various parties on rate reform proposals. TURN responds to the opening comments, of San Diego Gas & Electric (SDG&E), Pacific Gas & Electric (PG&E), Southern California Edison (SCE), the Environmental Defense Fund (EDF), and the Division of Ratepayer Advocates (DRA).

I. SDG&E’S RATE PROPOSAL WOULD HAVE EXTREME BILL IMPACTS

In opening comments, SDG&E asserts that its rate design proposal will “provide a smooth and long-term transition to optimal rates that minimizes bill impacts”.¹ This assertion has been difficult to verify since SDG&E refused to provide any illustrative rates in its original proposal. After being scolded by the ALJ and Energy Division, SDG&E reluctantly provided four rate design permutations for distribution and commodity rates in a supplemental July 1st filing. Due to deficiencies in its July 1st supplemental filing, SDG&E was directed by the Commission to submit another supplemental filing modeling the bill impacts of a complete retail rate (fixed and commodity charges).

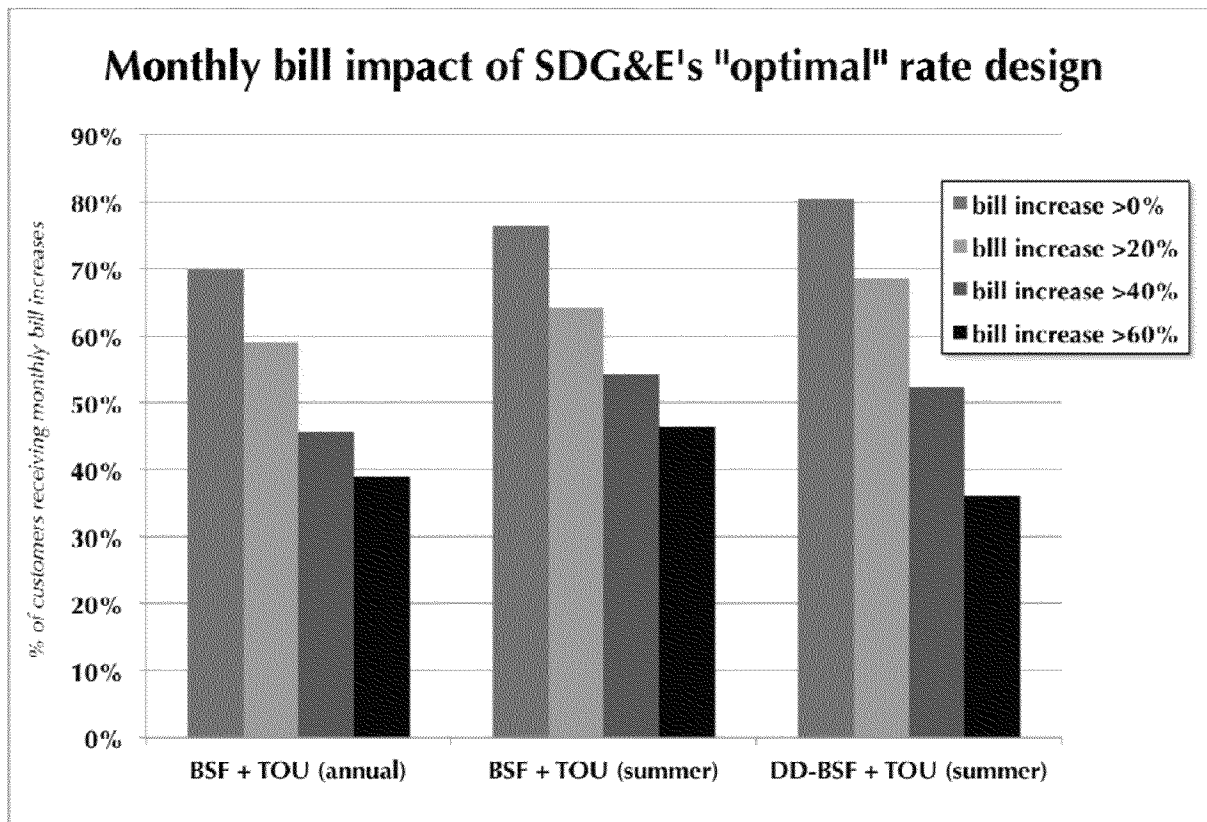
SDG&E’s second supplemental filing (submitted July 17th) proposed “illustrative” rates that included fixed charges (either a Basic Service fee of \$38.42 / month or a Demand Differentiated Basic Service Fee between \$15-65.17 / month) and a choice between TOU or flat commodity rates.² Without any explanation, SDG&E made significant revisions to its proposed TOU rate between the July 1st and the July 17th



¹ SDG&E opening comments, page 1.

² SDG&E did not propose a flat commodity rate in its July 1st filing. In its July 17th filing, SDG&E added a flat rate option of 13.7 cents / kwh without explanation.

increases of greater than 0%, 20%, 40% and 60% under the combination of SDG&E's proposed Basic Service Fee (BSF) or Demand Differentiated Basic Service Fee (DD-BSF) and the Time of Use (TOU) commodity rate.



As shown above, the combination of a \$38.42/ month basic service fee plus TOU commodity rates with ratios of 3.24 / 1 (peak / off-peak) in the summer and 1.24 / 1 (peak / off-peak) in the winter produces higher bills (compared to current rates) for 70% of non-CARE customers. On an annual basis, 59% of customers would receive bill increases in excess of 20% and 39% of customers would receive monthly bill increases of more than 60%. While 30% of customers would see bill reductions, more than half the total reductions would be provided to approximately 5% of the highest usage residential customers.

it is reasonable to assume that CARE and non-CARE customers have different price elasticities. CARE usage should be assumed to be far more sensitive to increases in price. PG&E did not appear to make such an assumption and fails to disentangle the separate impacts of tier flattening and raising average CARE rates.

III. TOU RATES ARE MORE LIKELY TO PROMOTE LOAD SHIFTING AND PEAK-WEIGHTED CONSERVATION THAN TRUE ENERGY EFFICIENCY

TURN is concerned that advocates of TOU rates appear to be narrowly focused on using rates to reduce customer demand during summer peak periods. The prevailing assumption amongst TOU advocates is that reductions in demand and usage outside of summer peak hours have minimal value. Based on this worldview, some parties have proposed TOU rates that could severely erode the value of energy efficiency and conservation measures that provide baseload or off-peak weighted reductions.

EDF cites PG&E in claiming that existing tiered rates “shield lower energy users from increasing their appliance efficiencies, significantly muting any potential conservation benefit from the rates. While appliances that are always on, such as refrigerators and freezers, are susceptible to overall bill levels under virtually any rate structure, other residential electricity uses – such as clothes drying, cooking, and washing – could be shifted to lower cost periods under time variant rates, thereby creating peak load reduction benefits.”⁸

This perspective ignores the fact that a relatively small percentage of customers are “shielded” from any meaningful marginal price signal. TURN previously demonstrated that 68-85% of non-CARE PG&E residential customers (depending on climate zone) had

⁸ EDF opening comments, pages 11-12.

some usage in excess of 130% of baseline during 2009.⁹ The portion of customers facing higher marginal prices will increase if baseline quantities are reduced (from 55% to 50% of average consumption) and if TURN's three-tier rate proposal (which provides higher marginal prices for usage above 100% of baseline) is adopted. The relatively small number of users who remain entirely in Tier 1 after these changes should not be driving the entire conservation and efficiency debate.

Instead, the Commission should recognize that customers facing higher marginal prices associated with Tier 2 and 3 usage will be incentivized to make investments in more efficient "always on" appliances and high efficiency lighting (such as LEDs) used more heavily in off-peak hours. By contrast, the adoption of TOU with steep differentials would disproportionately reward reductions during peak periods and disfavor baseload reductions. At best, customers with an appliance that is "always on" would offset the average retail rate under TOU. Under a tiered rate, customers would receive a credit based on the highest marginal rate they pay in each billing cycle.

Many of the measures suggested by TOU advocates are primarily related to load shifting and may have little, if any, impact on total energy consumption. For example, a customer who uses a washing machine at 11pm instead of 4pm may satisfy the load shifting objective while still consuming the same number of kilowatt-hours. Furthermore, customers who understand that off-peak usage is billed at very low rates may be encouraged to increase their off-peak usage or forgo the purchase of more efficient appliances in favor of simply moving existing usage into off-peak periods. This virtual abandonment of off-peak or baseload efficiency and conservation measures has not been addressed by any of the TOU advocates.

The Commission should tread cautiously. If customers are told that they are only to mind their usage during peak, summer hours, there could be a substantial disincentive to embrace a variety of measures that promote round-the-clock conservation and

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⁹ TURN rate proposal, page 31, Figure 10.

efficiency. And some customers may be tempted to leave the lights on at night given the low prices they are being charged.

rates have completely ignored the more severe bill volatility problems caused by TOU rates.

As explained in SCE's comments and in SCE's rate design proposal, Legislative action to amend tier differentials of utility rates was originally motivated by high winter bills associated with tiered natural gas rates and the extreme cold snap in 1987-1988.¹⁴ The resulting winter bill spikes led to the passage of SB 987, which enacted the language presently in § 739(d)(1).¹⁵ SCE quotes from a February 1988 letter from Commission President Hulett to the Legislature that explains that extreme bill volatility resulted from tier differentials that had risen to as high as 2.7:1 for gas.¹⁶ The tier differential in 1988 for PG&E was 2.1:1 for gas rates and 1.74:1 for electric rates.¹⁷

In response to SB 987 the Commission reduced electric tier differentials between the then two-tiered rates to between 1.15:1 and 1.27:1.¹⁸ SCE now claims that its proposal for a tier differential of 1.2:1 is more reasonable because it is "closer to the historical rate differentials that existed when the AB 1890 rate freeze was implemented in 1997."¹⁹ As both TURN and the utilities discussed in prior pleadings, SCE and PG&E electric customers experienced significant bill volatility in 2006 and 2009 due to electric demand fluctuations caused by hot summer weather. The tier differentials between the highest and lowest tiers at those times were 2.4:1 for SCE²⁰ and 3.0:1 for PG&E.²¹

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¹⁴ SCE Proposal, p. 23.

¹⁵ SCE proposal, p. 24. TURN has not independently researched the Legislative history of SB 987.

¹⁶ SCE Rate Design Proposal, p. 24.

¹⁷ See, D.93-06-087, 50 CPUC 2d 1, 31.

¹⁸ See, for example, D.96-04-050, 65 CPUC 2d 362, 431.

¹⁹ SCE Opening Comments, p. 8.

²⁰ SCE Rate Design Proposal, p. 25.

²¹ Based on August 2006 non-CARE rates of \$0.346 (Tier 5) and \$0.114 (Tier 1).

before embarking on any major policy changes. Given the work already performed to develop the bill calculator models, TURN recommends that the Commission instruct the utilities to perform the additional coding necessary to aggregate the model outputs in order to analyze bill impacts by season and by Climate Zone. Such a refinement of the models is entirely feasible, as illustrated by the outputs provided by DRA.

VI. FORECASTED COST SAVINGS FROM TOU RATES MAY BE DRAMATICALLY OVERSTATED

EDF asserts that any bill increases experienced under a TOU structure could be entirely offset by reductions in overall revenue requirements resulting from cost savings tied to customer behavior. Specifically, EDF states that “it is quite feasible to achieve a Pareto efficient outcome - where no customers are made worse off by the change in rate structure - under time variant rate structures.”²³ This effect would supposedly be the result of system revenue requirement reductions occurring in General Rate Cases. EDF also suggests that some portion of these savings could be “partially shared with the IOUs to incentivize them to effectively work toward broad adoption of TOU rates by residential customers”.²⁴

EDF’s model for estimating TOU savings relies on the simplified assumption that changes in residential customer demand and usage can be multiplied by marginal capacity, generation and distribution costs to determine revenue requirement reductions.²⁵ This approach does not accurately estimate the expected savings

²³ EDF opening comments, page 8.

²⁴ EDF opening comments, page 9.

²⁵ EDF rate proposal, page A-4. (“The revenue sub-model estimates the change in total costs, comprised of capacity, generation and distribution costs, as well as change in utility marginal benefits for PG&E E-1, SCE Domestic and SDG&E DR rate groups when some portion of the group is moved to a TOU rate. To determine the change, the model first computes each cost component for the residential class before TOU are introduced and after some proportion of the residential class has moved to TOU. Generation energy costs are determined by multiplying the marginal generation

associated with changes in customer demand and consumption. Reliance on this methodology would grossly inflate the benefits of TOU rates and, combined with proposals to “share” these estimated benefits with utilities, could result in net increases in system costs.

The simplified assumptions used by EDF to calculate total ratepayer savings are deeply flawed. There is no support for the assumption that all, or even most, marginal distribution costs can be offset by peak demand reductions. There is also no basis for concluding that embedded distribution costs will decline due to peak load reductions, an assumption that is implicit in the EDF analysis.

Moreover, portions of the distribution cost are not marginal to peak demand and can only be avoided by new construction (i.e., primary distribution line extensions). Some marginal distribution costs are tied to peak circuit loads that may not be coincident with TOU summer peak periods. For example, some of PG&E and SDG&E’s distribution circuits are winter peaking and may realize no net savings from reductions in peak summer loads. More importantly, marginal distribution costs are location-specific and can be close to zero in some areas. The type of analysis conducted by EDF does not account for any of these factors. The Commission should have serious doubts about the validity of these estimates.

With respect to generation capacity marginal costs, there may be limited savings if the system contains significant surplus relative to currently forecasted demand. As the Commission is well aware, generation needs for the foreseeable future are related to localized need and possibly flexible capacity (much of which is already operating on the system). If there is excess system capacity, TOU-driven peak load reductions may result, at best, in a slight reduction in the procurement of Resource Adequacy by energy costs (\$/KWh) for the summer period by summer usage. Generation capacity costs are the product of marginal generation capacity costs and peak load, and, similarly, distribution costs are estimated by multiplying the marginal distribution costs by peak load”)

the utilities. Since these market prices are typically far below the marginal cost of newly constructed generating capacity, the savings could be a fraction of the costs estimated by EDF.

The use of TOU rates is unlikely to substitute for measures to integrate intermittent renewable resources since the reductions will be tied to system peak conditions rather than being responsive to the variability of intermittent generation. Retail load modifications that can assist with integration include smart appliances under direct utility or third-party aggregator control. Some of these measures may have more value during the off-peak hours that are ignored by EDF.

It is also possible that TOU-driven demand reductions may reduce the “needle peak” but cause the reserve margin to rise because there would be more hours close to the system peak. Under a Loss of Load Probability analysis, this could result in more hours when the system runs the risk of being unable to serve available demand. This result could severely undermine the expected savings from TOU-motivated peak load shifting.

The Commission should not, under any circumstances, rely upon the EDF methodology to provide estimates of savings that could be “shared” with utilities. Because the estimates could be an order of magnitude too high, any “sharing” of inflated estimates could eliminate any actual savings that flow through to ratepayers.

VII. THE ENVIRONMENTAL BENEFITS OF TOU RATES HAVE NOT BEEN DEMONSTRATED

Advocates of default TOU rates argue that the switch to time variant pricing is beneficial because reductions in peak demand are more likely to result in reduced air emissions from fossil fuel power plants. EDF claims that TOU rates will lead to

production simulation modeling of the entire WECC to determine the impact of actions taken in California on electricity production and air emissions (NOx, SO2 and CO2) throughout the WECC.²⁹ The results of this study contradict the commonly held assumptions of TOU advocates.

Contrary to the assumptions of EDF and DRA, the Synapse report finds that although changes in peak and off-peak loads have an impact on emissions within California, there are much greater emissions impacts associated with displaced energy outside of California and within the WECC. Because the displaced energy outside of California has far higher emissions rates (due to the prevalence of coal), measures that led to a reduction in unit dispatch outside the state appear to have far more significant emissions impacts.

The study found the greatest displacement of out-of-state coal generation tied to the addition of in-state wind facilities that have more production in off-peak hours and seasons. When modeling the impact of wind in SDG&E’s service territory, “the greatest coal displacement occurs during the spring and early winter, so called ‘shoulder’ seasons where regional demand is relatively low and hydroelectric availability is greatest. According to the model results, coal generation in the Intermountain is primarily displaced during the shoulder seasons.”³⁰ The authors explain that “in periods of low demand, coal is displaced on a regular basis, while during the highest consumption months, natural gas is displaced almost exclusively.”³¹

Synapse Energy Economics for the California Energy Commission, November 2011. (Hereafter *Synapse study*).

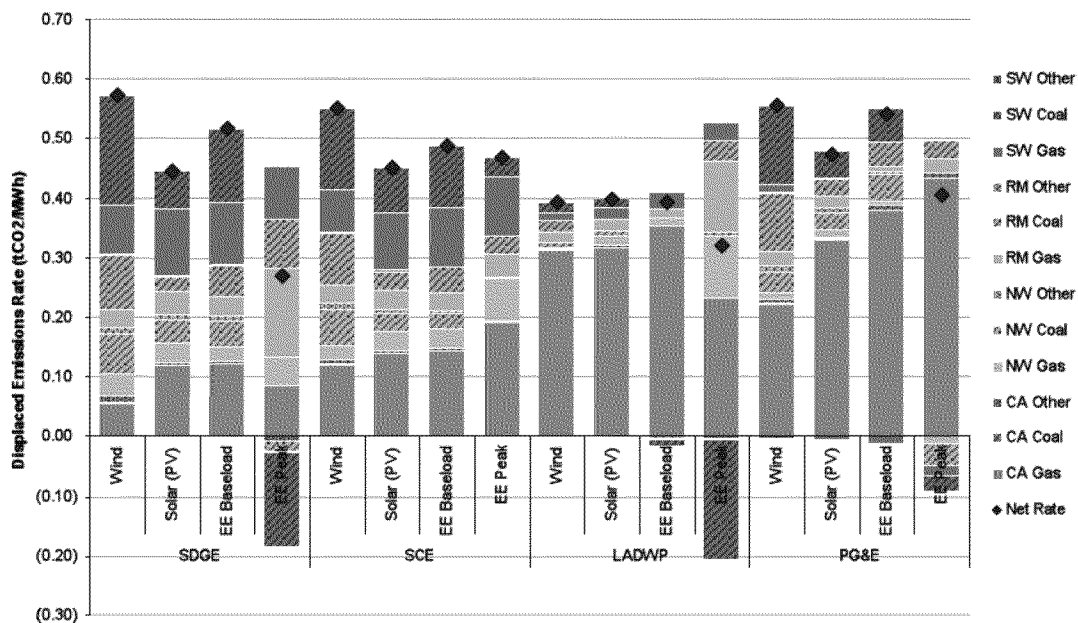
²⁹ The Synapse study modeled unit dispatch and was not based on commercial arrangements between California utilities and WECC generating units.

³⁰ Synapse study, page 51.

³¹ *Ibid.*

The Synapse study also analyzed peak load reductions of 10% in hours when system loads were in the 90th percentile or above.³² The authors found that peak load reductions did lessen the dispatch of in-state gas-fired generation but also produced smaller west-wide emissions reductions benefits than baseload energy efficiency or off-peak wind generation. This result suggests that prioritizing peak-load shifting will yield smaller emissions reductions than an emphasis on baseload, or off-peak, conservation and efficiency. The following figure shows the results of the analysis for on-peak, off-peak and baseload measures in each of four utility service territories:³³

Figure 3: Displaced CO₂ Emissions (tons of CO₂ / MWh of Energy Efficiency/Renewable Energy) by Western Electricity Coordinating Council Region and Fuel Type in 2016, Relative to the Base Case



As shown in this figure, on-peak reductions (listed as “EE peak”) typically yielded the smallest displaced CO₂ emissions of any of the measures studied. As can be seen in the color-coded bars, this result is based on the fact that on-peak summer

³² Synapse study, page 27.

³³ Synapse study, page 5.

reductions displace far more gas-fired generation than baseload or off-peak measures. By contrast, the addition of new wind facilities (which provide less output in peak hours and more output during off-peak periods such as the spring and winter) yielded the largest CO2 displacement due to the fact that this production reduced the dispatch of coal-fired units outside California. Similarly, baseload energy efficiency displaced more CO2 than peak-load reductions based on more significant offsets to the dispatch of coal-fired plants in the southwest, rocky mountains and northwest.

The report contains the following summary conclusions based on this extensive modeling effort:³⁴

Dispersed emissions benefits: The Western grid is highly interconnected, and therefore changes in load, generation, or resource availability in California affect generators throughout the entire Western Electricity Coordinating Council system. As a result, criteria emissions benefits from the energy efficiency / renewable energy programs implemented in California are highly dispersed. Further, programs implemented in different parts of California appear to have varying impacts across the Western Electricity Coordinating Council and within California. It is concluded that a comprehensive modeling approach is required to estimate the emissions reduction potential of energy efficiency / renewable energy in a highly interconnected and highly diverse region such as Western Electricity Coordinating Council.

Large benefit out-of-state: This research finds that while California does not necessarily realize significant criteria emissions benefit from energy efficiency / renewable energy programs in State, other regions of the West see significant emissions reductions from demand reductions in California, posing important questions about interstate energy and emissions planning. This out-of-state energy displacement, and particularly the displacement of coal in the Intermountain West, does not conform to conventional concepts about the nature and cost of energy resources in the Western Electricity Coordinating Council region. However, the results consistently show reductions in out-of-state coal, which have higher emissions than California generators, and hence deliver a significant benefit to other Western Electricity Coordinating Council

34 Synapse study, pages 5-6.

regions.

Greenhouse gas benefits: A notable benefit identified in this analysis is that energy efficiency / renewable energy programs have a large displacement outside of the state, often displacing coal-fired resources in the Rocky Mountain and Southwest regions of Western Electricity Coordinating Council. Because of this coal displacement, the greenhouse gas benefit of the energy efficiency / renewable energy programs is higher than would be seen were the displacement within California only. In many of the programs, displacing a combination of California natural gas and out-of-state coal (such as in the SDG&E wind scenario) results in a 50 percent increase in GHG emissions benefit (0.6 tons of carbon dioxide [tCO₂] / MWh) relative to displacing in-state natural gas only (such as in the LADWP baseload energy efficiency scenario, 0.4 tCO₂ / MWh).

TURN submits that this analysis should be taken seriously by the Commission and advocates of TOU rate designs. If the conclusions reached by Synapse are correct, policymakers need to reconsider the assumption that summer peak load reductions produce superior environmental benefits. State policies designed to move load to off-peak periods and seasons could end up yielding higher emissions throughout the WECC and defeating many of the environmental objectives behind rate reform.

B. Due to the cap on greenhouse gas emissions in California, reductions by some emitters may lead to increased emissions by other sources

Because California electric generation is now covered under the AB 32 cap-and-trade program administered by the California Air Resources Board (CARB), any measures intended to yield direct in-state reductions in CO₂ emissions may not provide incremental. Under a cap-and-trade system, the overall cap governs total emissions and reductions at one in-state peaking plant may simply free up allowances to cover increased emissions at another covered facility. The net effect of emissions reductions is to lower the price of CO₂ allowances which could, in turn, encourage increased emissions by other sources. This is exactly how the cap is supposed to function.

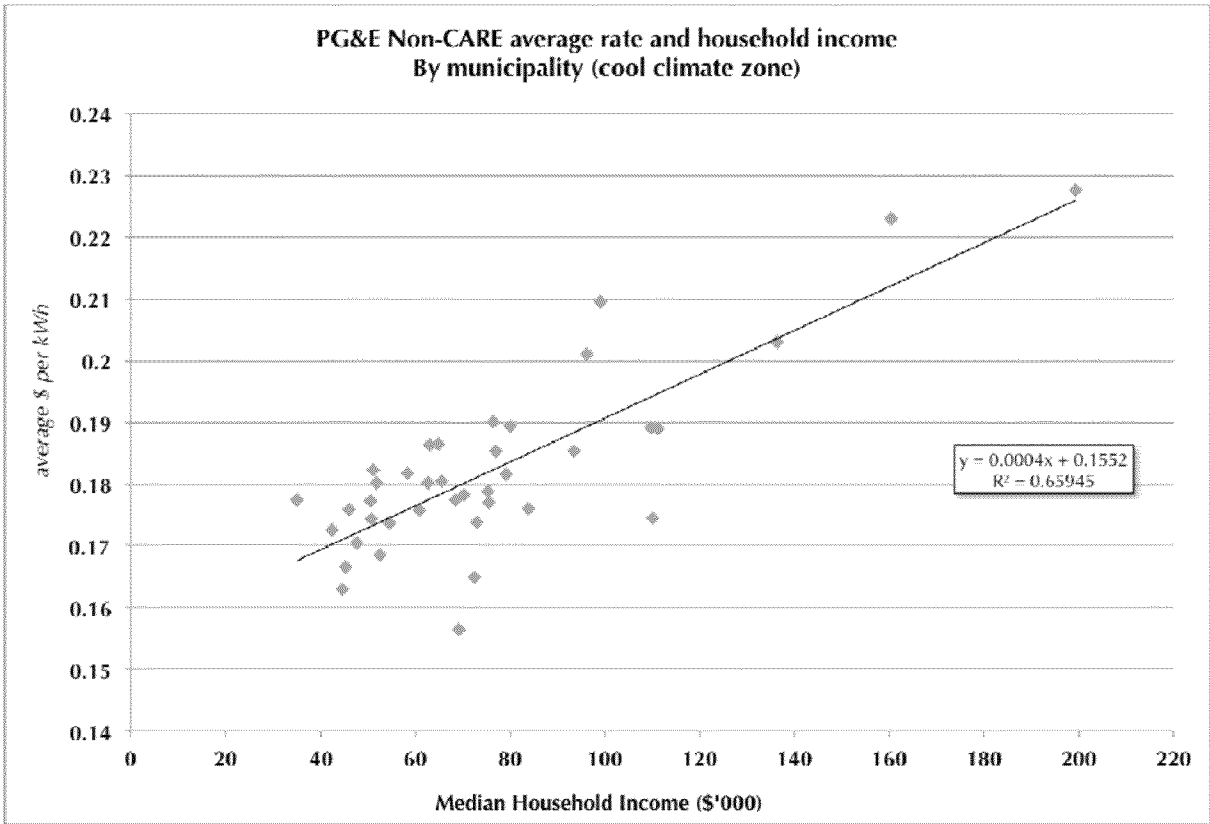
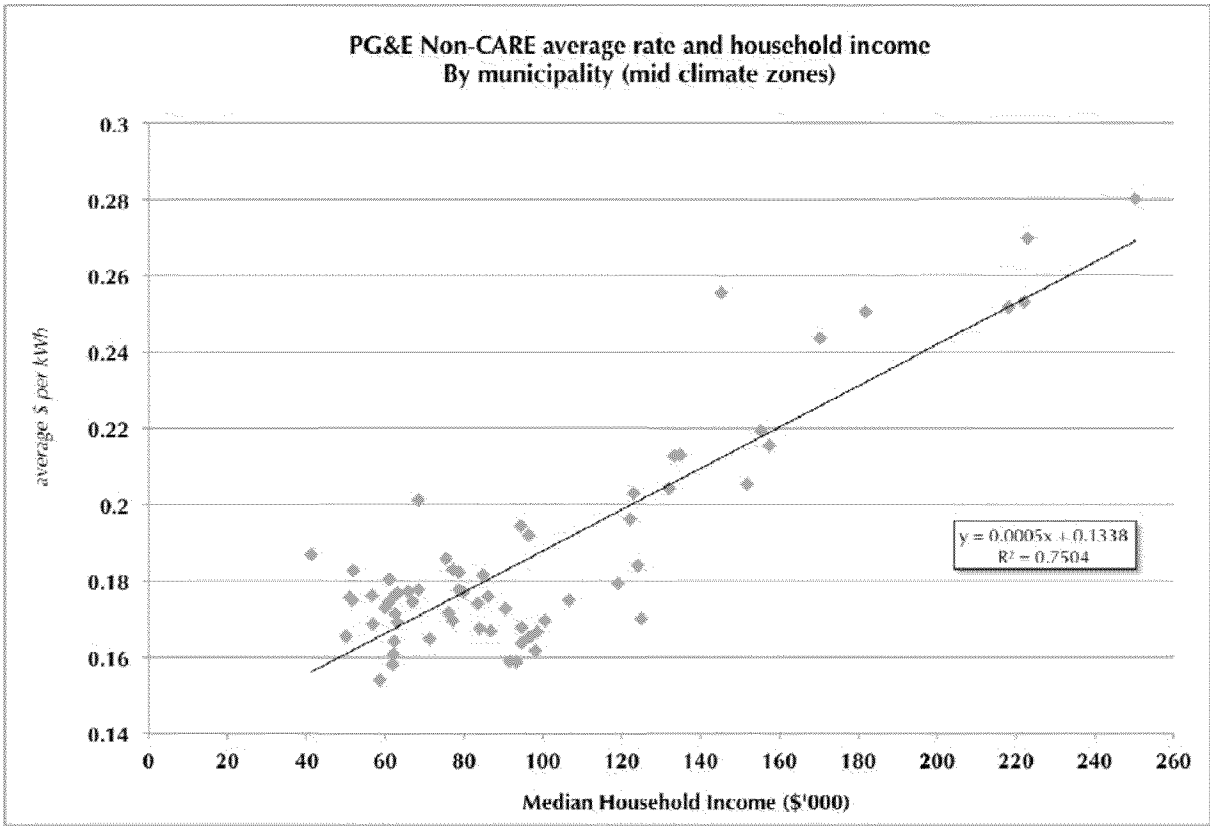
There is no basis for concluding that residential TOU rates would lead to net GHG emissions that are permanently below the AB 32 cap. TURN therefore questions whether any of the purported in-state CO2 benefits of peak-load reductions are actually incremental. By contrast, few Western states have binding greenhouse gas emissions limits. Any actions taken in California that reduce the dispatch of coal-fired power plants in other Western states would yield truly incremental reductions. Because there are no caps or allowances in these states, the reduction in CO2 emissions by a particular unit does not free up, or reduce the pricing of, allowances. Therefore, policies that promote both in-state and out-of-state emissions reductions may prove more valuable than those that are focused exclusively on reducing the use of peakers in California.

C. Due to localized capacity needs and the way system needs are modeled, systemwide peak load reductions may have little impact on retirements

DRA takes issue with TURN's contention that TOU rates may not offset new generation construction because incremental system additions are being driven by local reliability concerns rather than meeting peak system loads. Specifically, DRA asserts that TURN's argument may not be valid "in the light of SONGS and OTC."³⁵ This reference is puzzling because there it is widely understood that any replacements for SONGS and retiring Once Through Cooling (OTC) plants must address local reliability rather than system peak needs. In the Long-term Procurement Plan (LTPP) docket (R.12-03-014), the Commission recently noted that ongoing studies related to the SONGS shutdown are focused on local area needs in the Los Angeles Basin local area and San Diego sub-area.³⁶

³⁵ DRA opening comments, page 30.

³⁶ See Revised Scoping Ruling and Memo of the Assigned Commissioner and Administrative Law Judge, R.12-03-014, May 21, 2013, page 4.



disproportionately to customers with the highest incomes in each area of the service territory and disproportionately burden customers with the lowest incomes.

Respectfully submitted,

_____/S/_____
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Dated: July 26, 2013

VERIFICATION

I, Matthew Freedman, am an attorney of record for THE UTILITY REFORM NETWORK in this proceeding and am authorized to make this verification on the organization's behalf. The statements in the foregoing document are true of my own knowledge, except for those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I am making this verification on TURN's behalf because, as the lead attorney in the proceeding, I have unique personal knowledge of certain facts stated in the foregoing document.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 26, 2013, at San Francisco, California.

_____/S/_____

Matthew Freedman
Staff Attorney

ATTACHMENT A

SDG&E RESPONSE TO TURN DATA REQUEST#3

**TURN DATA REQUEST
TURN-SDG&E-DR-03
RATE REFORM OIR -- R.12-06-013
SDG&E RESPONSE
DATE RECEIVED: July 2, 2013
DATE RESPONDED: July 22, 2013**

The responses to this data request refer to the supplemental filing SDG&E submitted, per the request of Energy Division, on July 15th 2013.

- I. Using the same inputs identified in the July 1 filing, please provide a bill impact analysis showing the difference between current rates and the following:
 - a. Step 5 basic service fee scenario
 - b. Step 5 demand-differentiated basic service fee
 - c. Step 5 commodity costs recovery through TOU rate
 - d. Step 5 basic service fee scenario + Step 5 commodity cost recovery through TOU rate
 - e. Step 5 demand-differentiated basic service fee + Step 5 commodity cost recovery through TOU rate

SDG&E Response 01:

On July 15, 2013, SDG&E submitted a supplemental response pursuant to Energy Division's request. As noted both in SDG&E's July 1st and July 15th submittals, the scenarios presented do not represent SDG&E's Optimal Residential Rate Design Proposal. SDG&E's proposal for an Optimal Residential Rate Design, filed on May 29, 2013, is one that meets the following criteria:

- ffi Utilities charge for the services they provide;
- ffi Rates are designed to recover costs on the same basis as they are incurred; and,
- ffi Incentives or subsidies that have been deemed necessary to further public policy objectives are separately and transparently identified.

Further, these illustrative scenarios have been developed in the absence of customer and stakeholder input and in the absence of knowledge concerning the conditions that will exist when future filings are made. SDG&E, as part of its Optimal Rate Design Proposal, emphasized the need to accommodate and seek ways to mitigate bill impacts in individual rate setting proceedings based on stakeholder input and then-existing conditions thereby necessitating a transition path that would continually re-examine context and priorities with each move towards more accurate prices. In its July 1st submittal in response to the ALJ Ruling, SDG&E provided scenarios reflecting a 5-step transition looking at individual rate components for the following:

- ffi Distribution recovery through a basic service fee;
- ffi Distribution recovery through a demand differentiated basic service fee; and
- ffi Commodity recovery through a time-of-use (TOU) rate.

In SDG&E's July 15th submittal, SDG&E provided illustrative bundled rate designs associated with its July 1st filing, specifically, 5-step transition looking at the total rate impact of the following scenarios:

**TURN DATA REQUEST
TURN-SDG&E-DR-03
RATE REFORM OIR -- R.12-06-013
SDG&E RESPONSE
DATE RECEIVED: July 2, 2013
DATE RESPONDED: July 22, 2013**

Response to Question 1 (Continued)

1. Distribution recovery through a basic service fee (BSF)
 - I. With commodity flat rate
 - II. With commodity TOU rate

2. Distribution recovery through demand differentiated BSF
 - I. With commodity flat rate
 - II. With commodity TOU rate

The following pages contain the illustrative bill impact graphs and data tables for Step 5 of each of the four scenarios as compared to current. In each scenario, the percentage impact from current as well as the average monthly dollar impact from current are included to give the best illustration of the relative bill impacts. For instance, a large percentage impact may correspond to a small dollar impact.

TURN DATA REQUEST
TURN-SDG&E-DR-03
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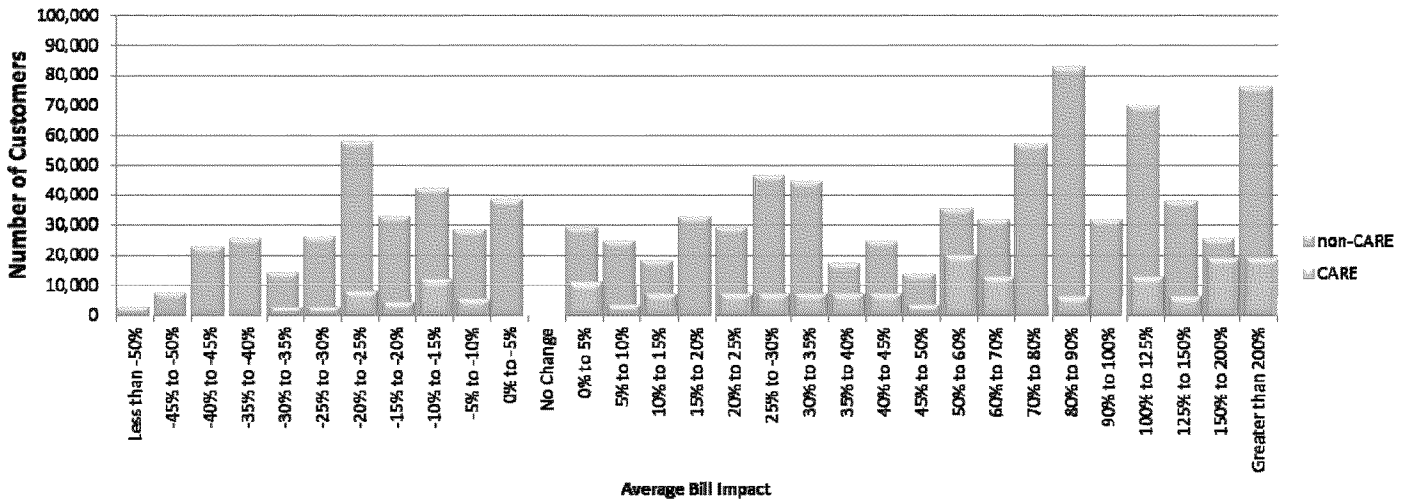
STEP 5 VERSUS CURRENT ILLUSTRATIVE BILL IMPACT GRAPHS

1. Distribution recovery through a basic service fee (BSF)

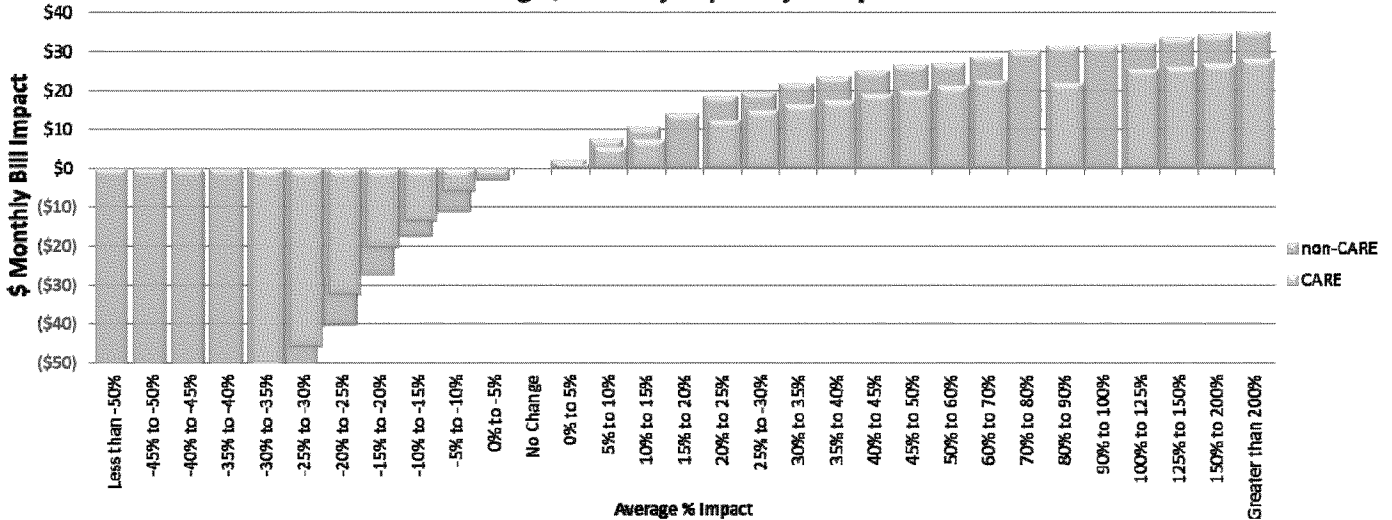
I. With commodity flat rate

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$36, which would be about \$7.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$28, which would be about \$5.60 per transitional step in the 5-step progression.

Number of Customers by % Impact



Average \$ Monthly Impact by % Impact



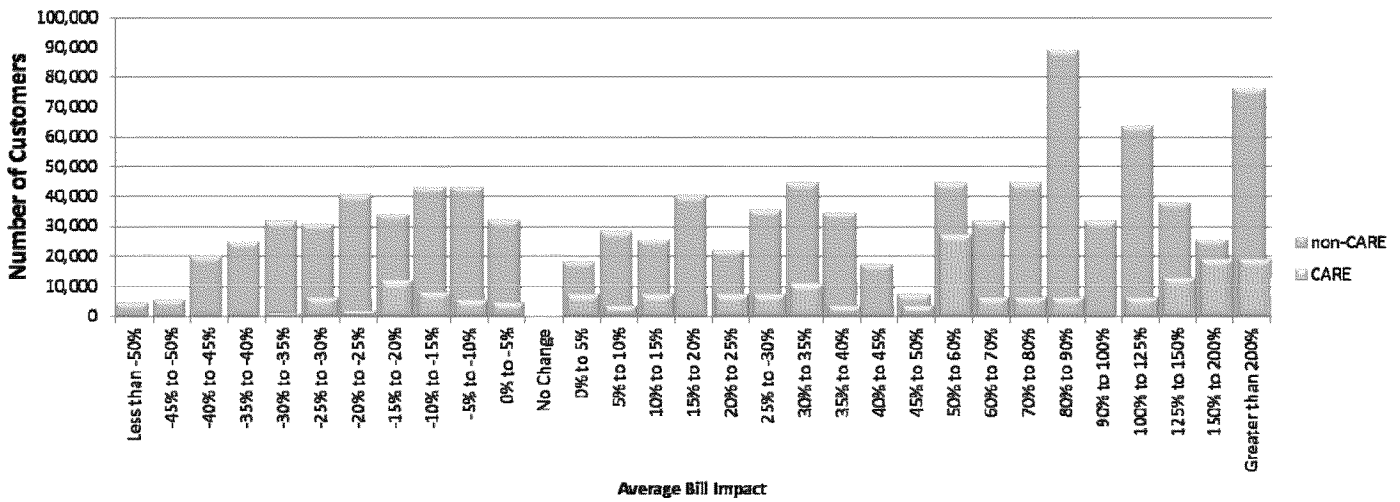
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I. Distribution recovery through a basic service fee (BSF)

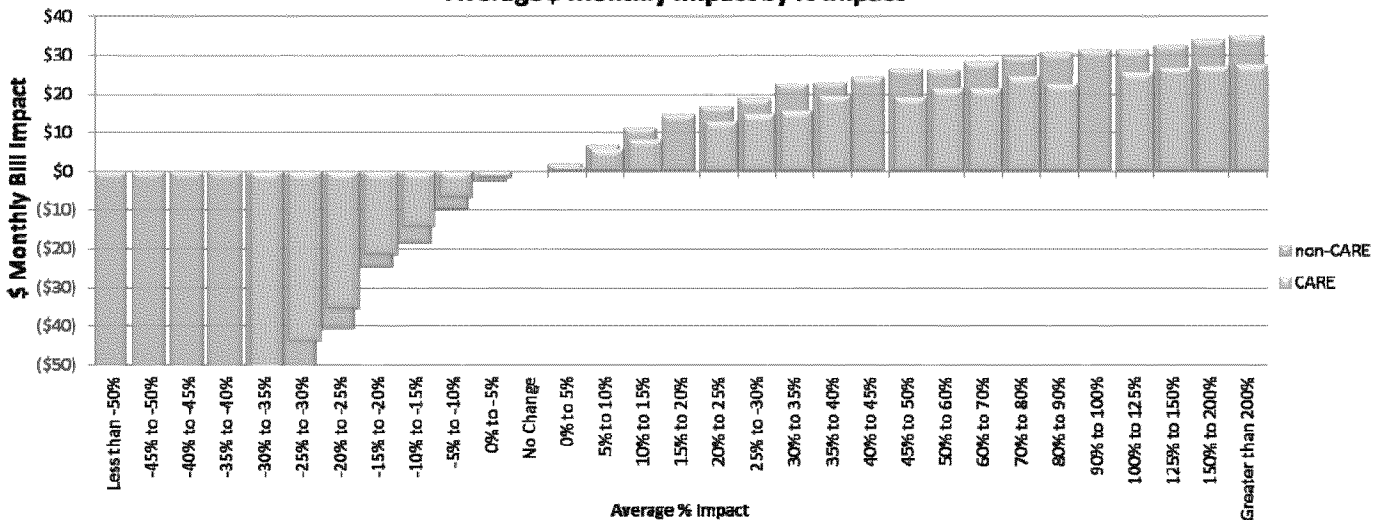
II. With commodity TOU rate

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$35, which would be about \$7.00 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$28, which would be about \$5.60 per transitional step in the 5-step progression.

Number of Customers by % Impact



Average \$ Monthly Impact by % Impact

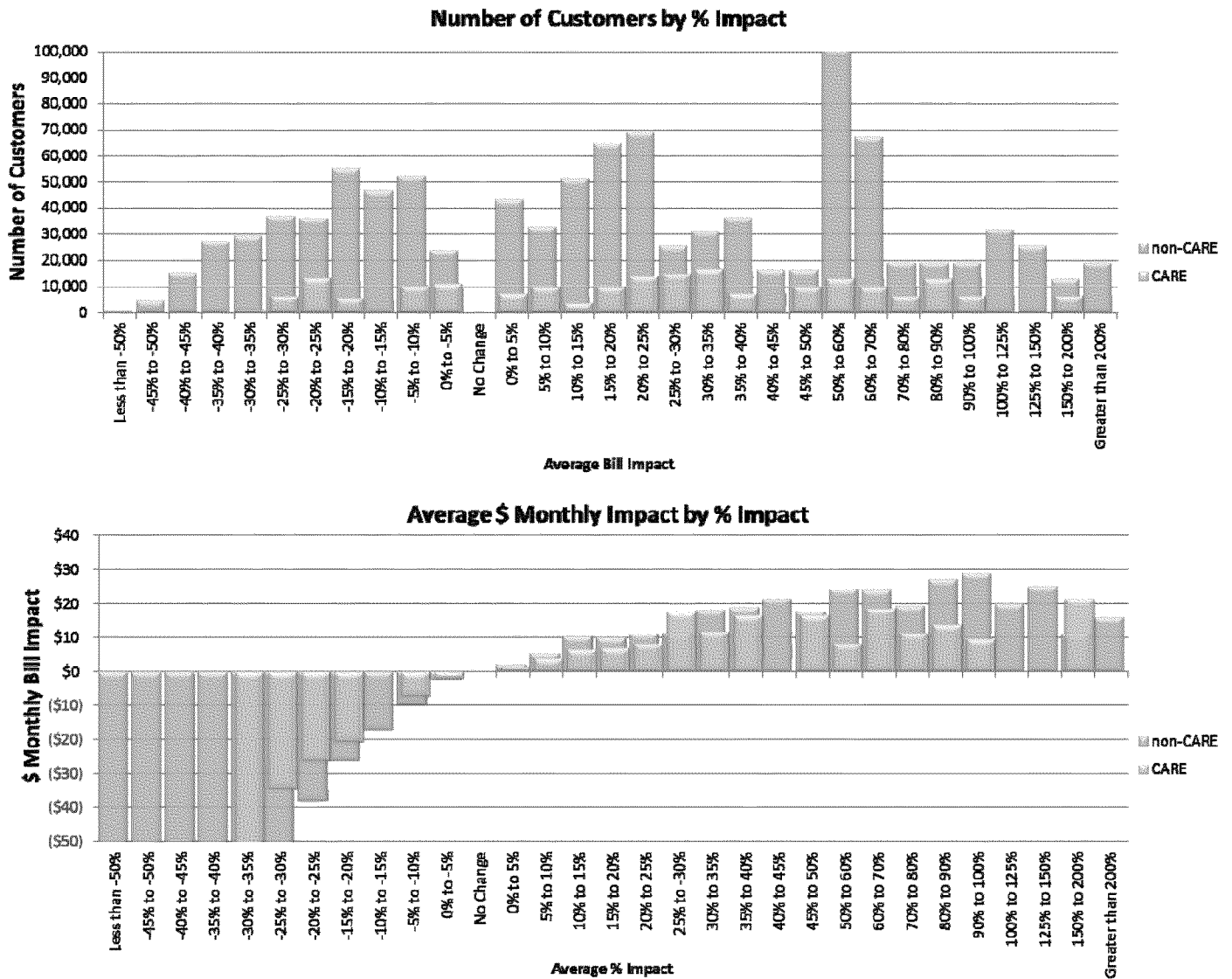


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2. Distribution recovery through demand differentiated BSF

I. With commodity flat rate

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$16, which would be about \$3.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$22, which would be about \$4.40 per transitional step in the 5-step progression.



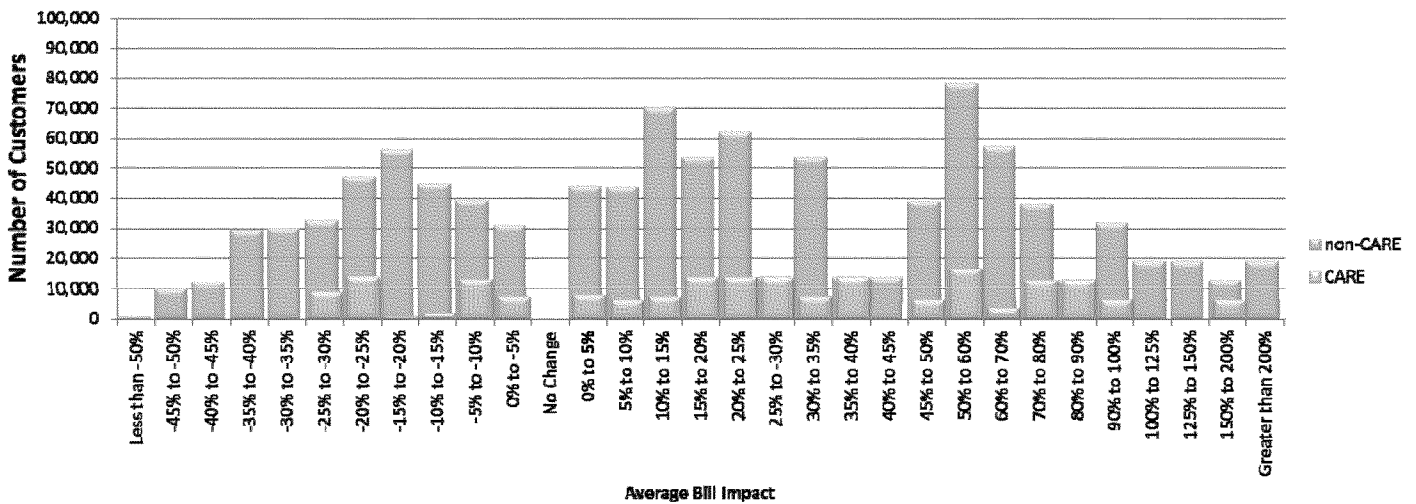
TURN DATA REQUEST
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2. Distribution recovery through demand differentiated BSF

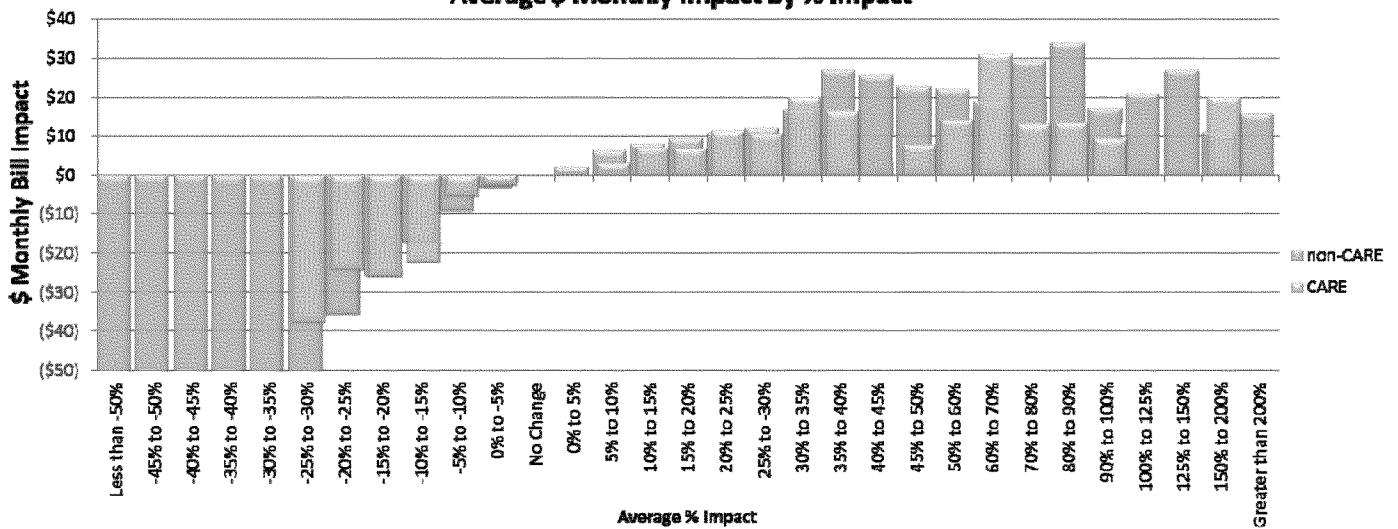
II. With commodity TOU rate

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$16, which would be about \$3.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$20, which would be about \$4.00 per transitional step in the 5-step progression.

Number of Customers by % Impact



Average \$ Monthly Impact by % Impact



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STEP 5 VERSUS CURRENT ILLUSTRATIVE DATA TABLES

I. Distribution recovery through a basic service fee (BSF)

I. With commodity flat rate

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$36, which would be about \$7.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$28, which would be about \$5.60 per transitional step in the 5-step progression.

% Impact Range	<i>Non-CARE</i>			<i>CARE</i>			<i>Combined</i>		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	2,847	(\$594)	4,033	0	\$0	0	2,847	(\$594)	4,033
-45% to -50%	7,591	(\$267)	2,141	0	\$0	0	7,591	(\$267)	2,141
-40% to -45%	22,774	(\$169)	1,588	0	\$0	0	22,774	(\$169)	1,588
-35% to -40%	25,621	(\$120)	1,337	0	\$0	0	25,621	(\$120)	1,337
-30% to -35%	14,234	(\$83)	1,106	2,847	(\$69)	1,441	17,081	(\$81)	1,162
-25% to -30%	26,299	(\$60)	970	2,847	(\$46)	1,188	29,146	(\$59)	992
-20% to -25%	57,887	(\$40)	834	8,270	(\$32)	1,060	66,157	(\$39)	862
-15% to -20%	33,079	(\$27)	825	4,609	(\$20)	934	37,688	(\$27)	839
-10% to -15%	42,297	(\$17)	717	11,930	(\$14)	791	54,227	(\$16)	733
-5% to -10%	28,469	(\$11)	748	5,558	(\$6)	746	34,027	(\$10)	748
0% to -5%	38,501	(\$3)	624	0	\$0	0	38,501	(\$3)	624
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	29,283	\$2	616	10,981	\$1	637	40,264	\$2	621
5% to 10%	24,668	\$8	509	3,660	\$6	559	28,329	\$7	515
10% to 15%	18,302	\$11	559	7,321	\$8	540	25,622	\$10	554
15% to 20%	32,943	\$14	499	0	\$0	0	32,943	\$14	499
20% to 25%	29,283	\$19	523	7,321	\$13	491	36,603	\$18	517
25% to 30%	46,630	\$20	449	7,321	\$15	494	53,951	\$19	455
30% to 35%	44,722	\$22	448	7,321	\$17	456	52,043	\$21	450
35% to 40%	17,348	\$24	415	7,321	\$18	438	24,668	\$22	422
40% to 45%	24,668	\$25	386	7,321	\$19	424	31,989	\$24	395
45% to 50%	13,687	\$27	376	3,660	\$20	392	17,348	\$25	379
50% to 60%	35,494	\$27	330	20,054	\$21	379	55,548	\$25	348
60% to 70%	31,833	\$29	312	12,733	\$23	337	44,567	\$27	319
70% to 80%	57,300	\$30	278	0	\$0	0	57,300	\$30	278
80% to 90%	82,767	\$32	257	6,367	\$22	234	89,133	\$31	256
90% to 100%	31,833	\$32	234	0	\$0	0	31,833	\$32	234
100% to 125%	70,033	\$32	200	12,733	\$26	215	82,767	\$31	202
125% to 150%	38,200	\$34	164	6,367	\$26	198	44,567	\$33	169
150% to 200%	25,467	\$35	139	19,100	\$27	161	44,567	\$31	148
Greater than 200%	76,400	\$36	67	19,100	\$28	108	95,500	\$34	75
Total	1,030,482	\$1	506	194,741	\$12	432	1,225,203	\$3	497

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I. Distribution recovery through a basic service fee (BSF)

II. With commodity TOU rate

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$35, which would be about \$7.00 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$28, which would be about \$5.60 per transitional step in the 5-step progression.

% Impact Range	<i>Non-CARE</i>			<i>CARE</i>			<i>Combined</i>		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	4,745	(\$484)	3,325	0	\$0	0	4,745	(\$484)	3,325
-45% to -50%	5,694	(\$240)	1,937	0	\$0	0	5,694	(\$240)	1,937
-40% to -45%	19,928	(\$173)	1,645	0	\$0	0	19,928	(\$173)	1,645
-35% to -40%	24,672	(\$119)	1,313	0	\$0	0	24,672	(\$119)	1,313
-30% to -35%	31,722	(\$75)	1,028	949	(\$77)	1,640	32,671	(\$75)	1,046
-25% to -30%	30,773	(\$55)	936	6,507	(\$44)	1,169	37,280	(\$53)	977
-20% to -25%	40,535	(\$41)	846	1,898	(\$35)	1,084	42,432	(\$41)	856
-15% to -20%	34,027	(\$25)	745	11,930	(\$22)	951	45,957	(\$24)	798
-10% to -15%	43,246	(\$19)	763	8,270	(\$14)	787	51,516	(\$18)	767
-5% to -10%	43,111	(\$10)	711	5,558	(\$7)	746	48,669	(\$10)	715
0% to -5%	32,130	(\$3)	666	4,609	(\$2)	772	36,739	(\$2)	680
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	18,302	\$2	540	7,321	\$1	535	25,622	\$2	538
5% to 10%	28,329	\$7	539	3,660	\$6	676	31,989	\$7	555
10% to 15%	25,622	\$11	531	7,321	\$8	540	32,943	\$11	533
15% to 20%	40,264	\$15	518	0	\$0	0	40,264	\$15	518
20% to 25%	21,962	\$17	471	7,321	\$13	491	29,283	\$16	476
25% to 30%	35,649	\$19	437	7,321	\$15	494	42,970	\$18	447
30% to 35%	44,722	\$23	460	10,981	\$16	436	55,703	\$21	456
35% to 40%	34,695	\$23	399	3,660	\$20	481	38,356	\$23	407
40% to 45%	17,348	\$24	384	0	\$0	0	17,348	\$24	384
45% to 50%	7,321	\$27	369	3,660	\$19	392	10,981	\$24	377
50% to 60%	44,567	\$26	325	27,375	\$22	391	71,941	\$25	350
60% to 70%	31,833	\$28	299	6,367	\$22	329	38,200	\$27	304
70% to 80%	44,567	\$30	274	6,367	\$25	345	50,933	\$29	283
80% to 90%	89,133	\$31	255	6,367	\$23	234	95,500	\$30	254
90% to 100%	31,833	\$31	233	0	\$0	0	31,833	\$31	233
100% to 125%	63,667	\$31	197	6,367	\$26	218	70,033	\$31	199
125% to 150%	38,200	\$33	164	12,733	\$27	205	50,933	\$31	174
150% to 200%	25,467	\$34	139	19,100	\$27	161	44,567	\$31	148
Greater than 200%	76,400	\$35	67	19,100	\$28	108	95,500	\$34	75
Total	1,090,462	\$1	506	194,741	\$12	452	1,225,203	\$2	497

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2. Distribution recovery through demand differentiated BSF

I. With commodity flat rate

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$16, which would be about \$3.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$22, which would be about \$4.40 per transitional step in the 5-step progression.

% Impact Range	<i>Non-CARE</i>			<i>CARE</i>			<i>Combined</i>		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	949	(\$1,003)	6,515	0	\$0	0	949	(\$1,003)	6,515
-45% to -50%	4,745	(\$276)	2,269	0	\$0	0	4,745	(\$276)	2,269
-40% to -45%	15,183	(\$192)	1,788	0	\$0	0	15,183	(\$192)	1,788
-35% to -40%	27,248	(\$114)	1,269	0	\$0	0	27,248	(\$114)	1,269
-30% to -35%	29,281	(\$92)	1,213	949	(\$78)	1,640	30,230	(\$91)	1,226
-25% to -30%	37,010	(\$52)	862	6,507	(\$34)	946	43,517	(\$49)	875
-20% to -25%	36,061	(\$38)	812	12,879	(\$26)	857	48,940	(\$35)	824
-15% to -20%	55,176	(\$26)	725	5,558	(\$21)	833	60,734	(\$26)	735
-10% to -15%	46,766	(\$17)	680	0	\$0	0	46,766	(\$17)	680
-5% to -10%	52,329	(\$10)	663	10,167	(\$7)	803	62,497	(\$9)	686
0% to -5%	23,860	(\$2)	673	10,981	(\$2)	751	34,841	(\$2)	698
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	43,106	\$2	578	7,321	\$2	473	50,426	\$2	562
5% to 10%	32,933	\$5	456	10,027	\$4	429	42,960	\$5	450
10% to 15%	51,245	\$11	522	3,660	\$7	469	54,905	\$10	518
15% to 20%	64,771	\$10	376	10,027	\$7	425	74,798	\$10	383
20% to 25%	69,235	\$11	331	13,687	\$8	353	82,922	\$11	335
25% to 30%	25,467	\$12	259	14,641	\$18	548	40,108	\$14	365
30% to 35%	31,035	\$18	382	16,394	\$12	352	47,429	\$16	372
35% to 40%	36,448	\$19	348	7,321	\$17	430	43,768	\$19	362
40% to 45%	16,394	\$22	336	0	\$0	0	16,394	\$22	336
45% to 50%	16,394	\$18	266	10,027	\$17	320	26,421	\$18	287
50% to 60%	101,068	\$24	306	12,733	\$8	162	113,802	\$23	290
60% to 70%	67,327	\$24	252	10,027	\$19	290	77,354	\$23	257
70% to 80%	19,100	\$20	187	6,367	\$11	159	25,467	\$18	180
80% to 90%	19,100	\$27	227	12,733	\$14	163	31,833	\$22	202
90% to 100%	19,100	\$29	211	6,367	\$10	103	25,467	\$24	184
100% to 125%	31,833	\$20	131	0	\$0	0	31,833	\$20	131
125% to 150%	25,467	\$25	131	0	\$0	0	25,467	\$25	131
150% to 200%	12,733	\$11	24	6,367	\$22	114	19,100	\$15	54
Greater than 200%	19,100	\$16	32	0	\$0	0	19,100	\$16	32
Total	1,030,482	(\$5)	506	194,741	\$5	452	1,225,203	(\$4)	497

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2. Distribution recovery through demand differentiated BSF

II. With commodity TOU rate

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$16, which would be about \$3.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$20, which would be about \$4.00 per transitional step in the 5-step progression.

% Impact Range	<i>Non-CARE</i>			<i>CARE</i>			<i>Combined</i>		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	949	(\$1,022)	6,515	0	\$0	0	949	(\$1,022)	6,515
-45% to -50%	10,303	(\$192)	1,624	0	\$0	0	10,303	(\$192)	1,624
-40% to -45%	12,201	(\$155)	1,446	0	\$0	0	12,201	(\$155)	1,446
-35% to -40%	29,281	(\$129)	1,431	0	\$0	0	29,281	(\$129)	1,431
-30% to -35%	29,960	(\$80)	1,097	0	\$0	0	29,960	(\$80)	1,097
-25% to -30%	32,536	(\$58)	933	9,219	(\$38)	993	41,754	(\$54)	946
-20% to -25%	47,042	(\$36)	772	13,828	(\$24)	800	60,870	(\$33)	778
-15% to -20%	56,125	(\$26)	727	949	(\$26)	1,158	57,074	(\$26)	734
-10% to -15%	45,003	(\$17)	682	1,898	(\$22)	1,089	46,901	(\$17)	698
-5% to -10%	39,450	(\$9)	620	12,879	(\$5)	636	52,329	(\$8)	624
0% to -5%	31,181	(\$3)	685	7,321	(\$3)	998	38,501	(\$3)	744
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	44,049	\$2	527	8,270	\$1	529	52,319	\$2	528
5% to 10%	43,919	\$6	567	6,367	\$3	373	50,286	\$6	542
10% to 15%	70,340	\$8	411	7,321	\$7	497	77,660	\$8	419
15% to 20%	53,790	\$10	351	13,687	\$7	425	67,478	\$9	366
20% to 25%	61,914	\$11	326	13,687	\$12	432	75,602	\$11	345
25% to 30%	13,687	\$12	276	13,687	\$11	367	27,375	\$12	322
30% to 35%	53,795	\$17	352	7,321	\$20	527	61,116	\$17	373
35% to 40%	13,687	\$27	486	13,687	\$16	395	27,375	\$22	441
40% to 45%	13,687	\$26	394	0	\$0	0	13,687	\$26	394
45% to 50%	39,154	\$23	332	6,367	\$8	165	45,521	\$21	308
50% to 60%	78,308	\$22	284	16,394	\$14	257	94,702	\$21	279
60% to 70%	57,300	\$19	206	3,660	\$31	450	60,960	\$20	221
70% to 80%	38,200	\$30	274	12,733	\$13	179	50,933	\$26	250
80% to 90%	12,733	\$34	279	12,733	\$14	163	25,467	\$24	221
90% to 100%	31,833	\$17	123	6,367	\$10	103	38,200	\$16	120
100% to 125%	19,100	\$21	139	0	\$0	0	19,100	\$21	139
125% to 150%	19,100	\$27	141	0	\$0	0	19,100	\$27	141
150% to 200%	12,733	\$11	24	6,367	\$20	114	19,100	\$14	54
Greater than 200%	19,100	\$16	32	0	\$0	0	19,100	\$16	32
Total	1,090,462	(\$6)	506	194,741	\$5	452	1,225,203	(\$4)	497

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2. Please show the full retail rates that would result at each Step (1, 2, 3, 4, 5) from the following:
- a. Demand-differentiated basic service fee + commodity cost recovery through TOU rate
 - b. Basic service fee + commodity cost recovery through TOU rate

SDG&E Response 02:

The supplemental filing SDG&E submitted, per the request of Energy Division, on July 15, 2013 contains total retail rates for each Step of the scenarios noted in the response to Question 1.

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3. Did SDG&E model the impact of any of the proposed changes by baseline zone? If so, please provide the results of any such analysis.

SDG&E Response 03:

No.

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SDG&E RESPONSE
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4. Please provide all bill impacts requested in questions (1) and (2) by month or season (summer/winter). If SDG&E cannot provide this information, explain why seasonal (or monthly) bill impacts cannot be estimated.

SDG&E Response 04:

The following pages contain the illustrative bill impact graphs and data tables for Step 5 of each of the four scenarios as compared to current, shown separately by summer and winter.

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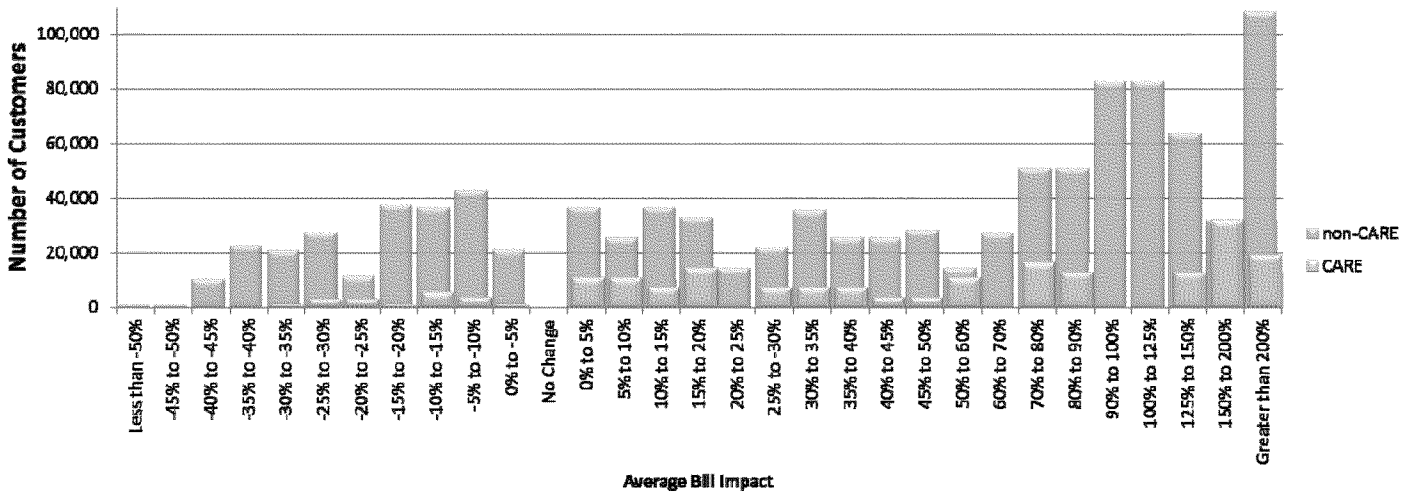
SUMMER: STEP 5 VERSUS CURRENT ILLUSTRATIVE BILL IMPACT GRAPHS

I. Distribution recovery through a basic service fee (BSF)

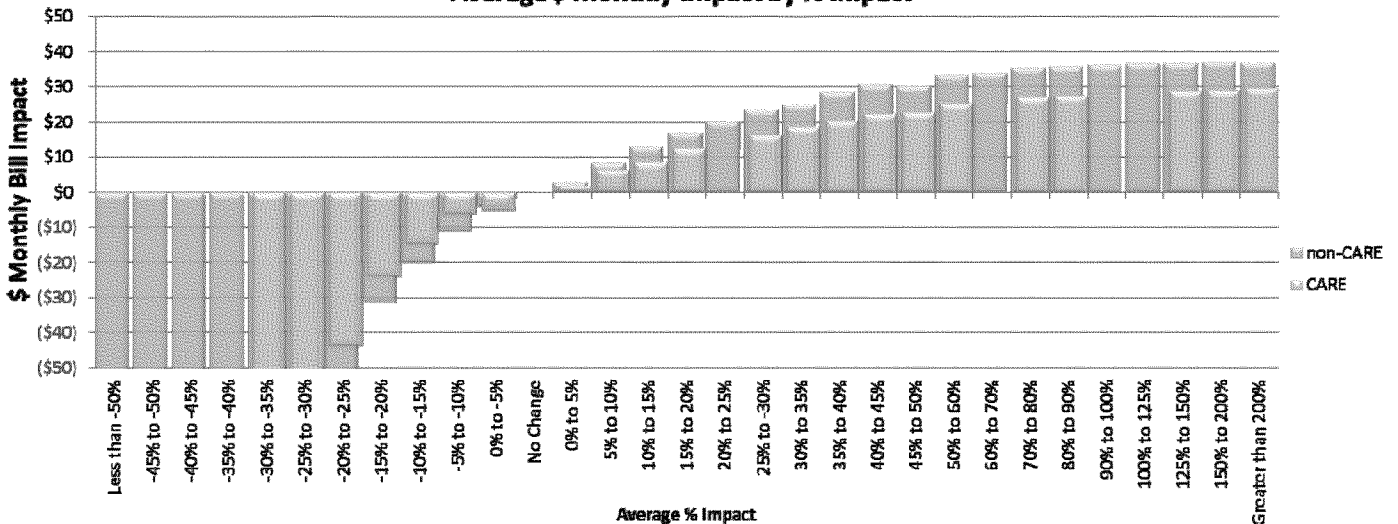
I. With commodity flat rate (Summer)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$37, which would be about \$7.40 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$30, which would be about \$6.00 per transitional step in the 5-step progression.

Number of Customers by % Impact



Average \$ Monthly Impact by % Impact

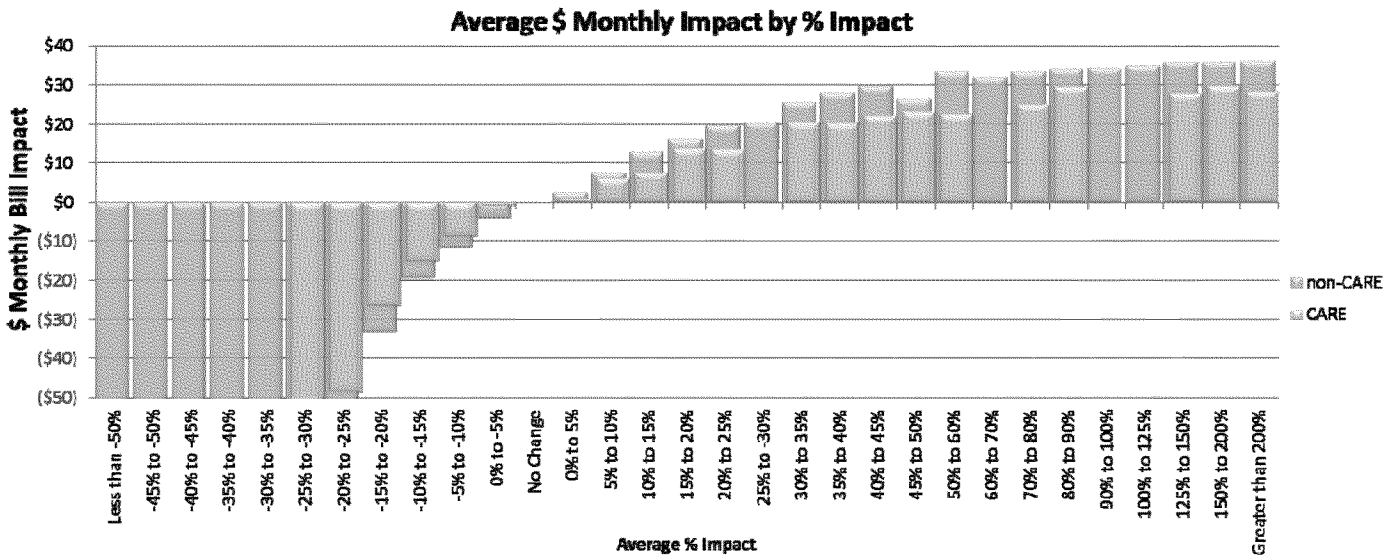
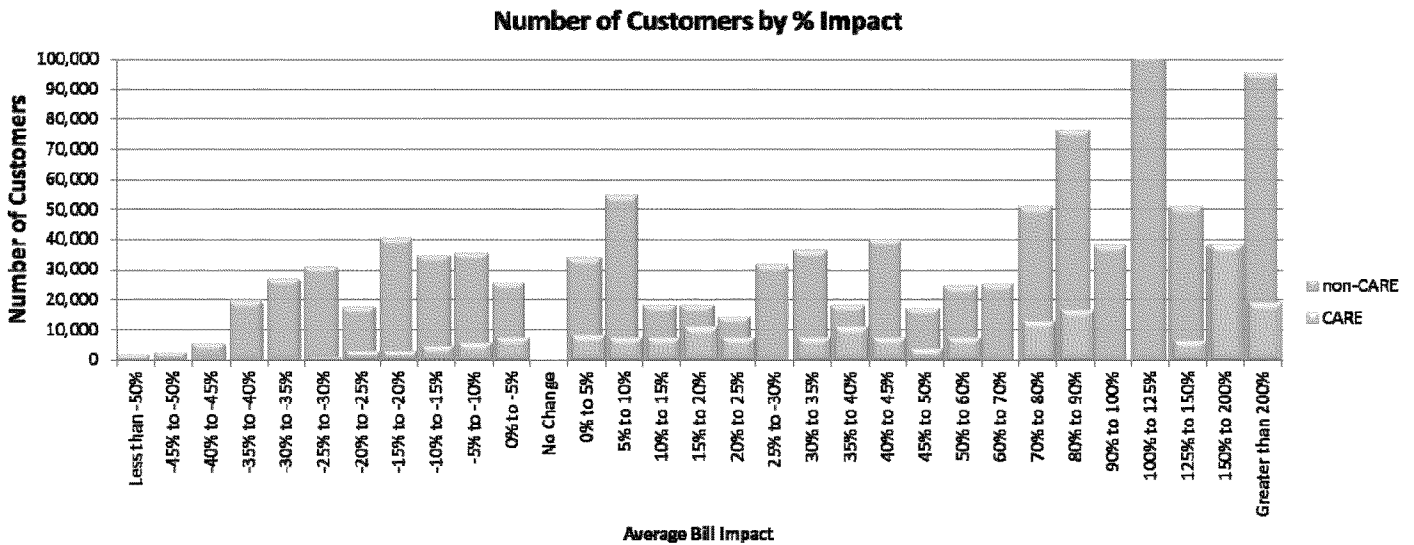


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I. Distribution recovery through a basic service fee (BSF)

II. With commodity TOU rate (Summer)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$36, which would be about \$7.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$29, which would be about \$5.80 per transitional step in the 5-step progression.

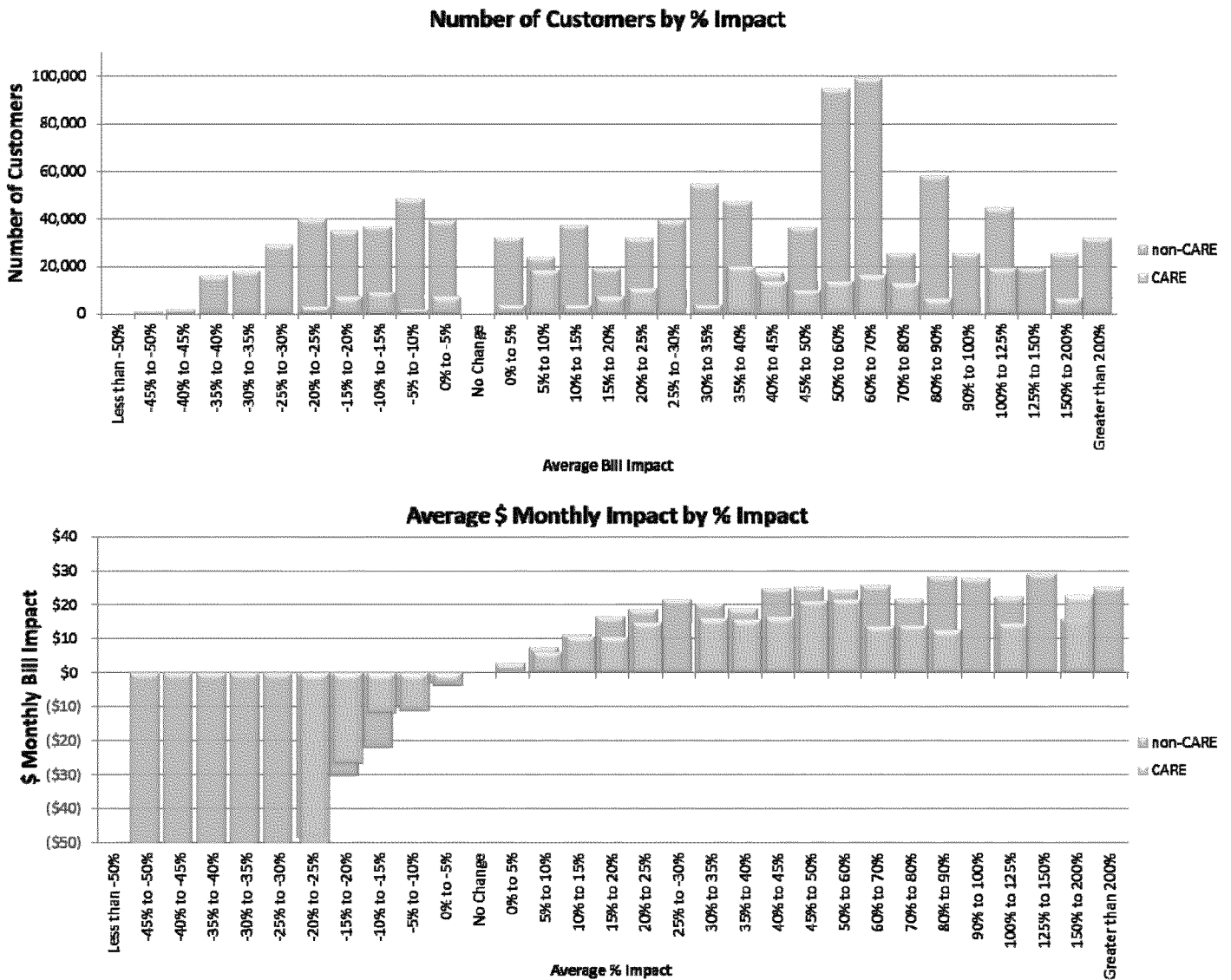


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2. Distribution recovery through demand differentiated BSF

I. With commodity flat rate (Summer)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$26, which would be about \$5.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$23, which would be about \$4.60 per transitional step in the 5-step progression.



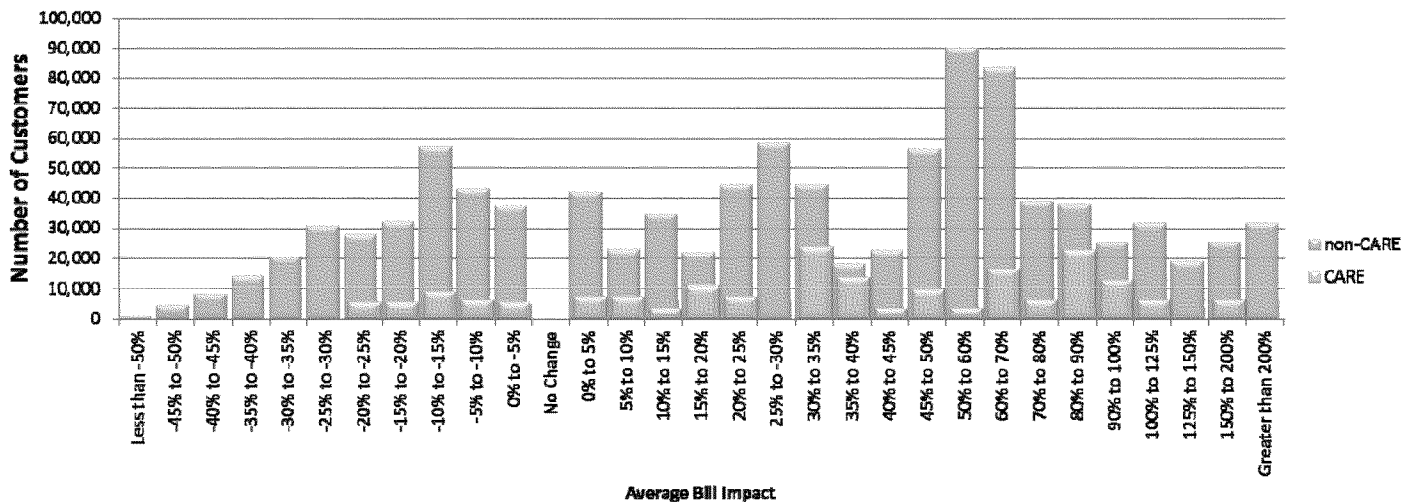
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2. Distribution recovery through demand differentiated BSF

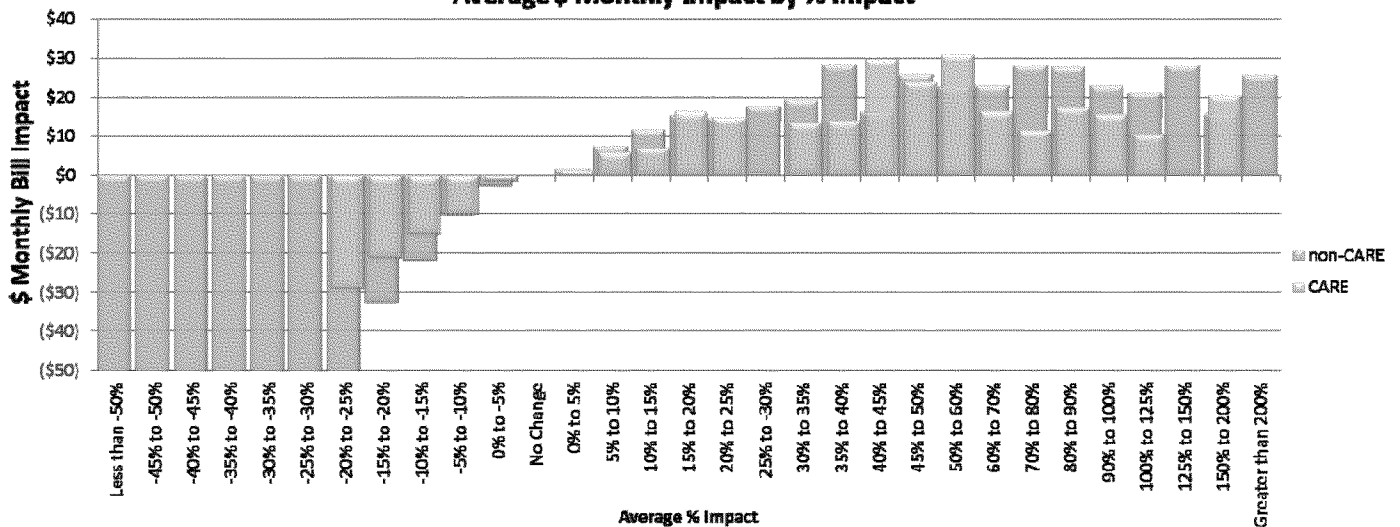
II. With commodity TOU rate (Summer)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$26, which would be about \$5.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$21, which would be about \$4.20 per transitional step in the 5-step progression.

Number of Customers by % Impact



Average \$ Monthly Impact by % Impact



TURN DATA REQUEST
 TURN-SDG&E-DR-03
 RATE REFORM OIR – R.12-06-013
 SDG&E RESPONSE
 DATE RECEIVED: July 2, 2013
 DATE RESPONDED: July 22, 2013

SUMMER: STEP 5 VERSUS CURRENT ILLUSTRATIVE DATA TABLES

I. Distribution recovery through a basic service fee (BSF)

I. With commodity flat rate (Summer)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$37, which would be about \$7.40 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$30, which would be about \$6.00 per transitional step in the 5-step progression.

% Impact Range	<i>Non-CARE</i>			<i>CARE</i>			<i>Combined</i>		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	949	(\$993)	6,708	0	\$0	0	949	(\$993)	6,708
-45% to -50%	949	(\$357)	2,800	0	\$0	0	949	(\$357)	2,800
-40% to -45%	10,438	(\$229)	2,051	0	\$0	0	10,438	(\$229)	2,051
-35% to -40%	22,774	(\$154)	1,613	0	\$0	0	22,774	(\$154)	1,613
-30% to -35%	20,876	(\$107)	1,328	949	(\$81)	1,697	21,825	(\$106)	1,344
-25% to -30%	27,519	(\$77)	1,161	2,847	(\$57)	1,458	30,366	(\$75)	1,189
-20% to -25%	11,387	(\$54)	1,090	2,847	(\$44)	1,314	14,234	(\$52)	1,134
-15% to -20%	37,823	(\$31)	845	949	(\$24)	963	38,772	(\$31)	848
-10% to -15%	36,739	(\$20)	776	5,558	(\$15)	938	42,297	(\$19)	797
-5% to -10%	43,111	(\$11)	726	3,660	(\$6)	759	46,771	(\$11)	728
0% to -5%	21,149	(\$4)	699	949	(\$5)	921	22,097	(\$4)	708
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	36,603	\$3	636	10,981	\$2	683	47,585	\$3	647
5% to 10%	25,622	\$8	613	10,981	\$7	648	36,603	\$8	623
10% to 15%	36,603	\$13	581	7,321	\$9	541	43,924	\$12	575
15% to 20%	32,943	\$17	552	14,641	\$13	613	47,585	\$16	571
20% to 25%	14,641	\$20	538	0	\$0	0	14,641	\$20	538
25% to 30%	21,962	\$24	509	7,321	\$16	519	29,283	\$22	511
30% to 35%	35,649	\$25	467	7,321	\$19	499	42,970	\$24	473
35% to 40%	25,622	\$29	489	7,321	\$20	497	32,943	\$27	491
40% to 45%	25,622	\$31	481	3,660	\$22	476	29,283	\$30	481
45% to 50%	28,329	\$30	406	3,660	\$23	428	31,989	\$30	408
50% to 60%	14,641	\$34	414	10,981	\$25	443	25,622	\$30	426
60% to 70%	27,375	\$34	366	0	\$0	0	27,375	\$34	366
70% to 80%	50,933	\$36	324	16,394	\$27	353	67,327	\$34	331
80% to 90%	50,933	\$36	294	12,733	\$28	317	63,667	\$34	299
90% to 100%	82,767	\$36	263	0	\$0	0	82,767	\$36	263
100% to 125%	82,767	\$37	224	0	\$0	0	82,767	\$37	224
125% to 150%	63,667	\$37	184	12,733	\$29	205	76,400	\$36	188
150% to 200%	31,833	\$37	160	31,833	\$29	166	63,667	\$33	163
Greater than 200%	108,233	\$37	75	19,100	\$30	110	127,333	\$36	80
Total	1,030,482	\$9	494	194,741	\$17	441	1,225,208	\$11	486

TURN DATA REQUEST
 TURN-SDG&E-DR-03
 RATE REFORM OIR – R.12-06-013
 SDG&E RESPONSE
 DATE RECEIVED: July 2, 2013
 DATE RESPONDED: July 22, 2013

I. Distribution recovery through a basic service fee (BSF)

II. With commodity TOU rate (Summer)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$36, which would be about \$7.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$29, which would be about \$5.80 per transitional step in the 5-step progression.

% Impact Range	<i>Non-CARE</i>			<i>CARE</i>			<i>Combined</i>		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	1,898	(\$654)	4,369	0	\$0	0	1,898	(\$654)	4,369
-45% to -50%	2,847	(\$281)	2,213	0	\$0	0	2,847	(\$281)	2,213
-40% to -45%	5,694	(\$203)	1,807	0	\$0	0	5,694	(\$203)	1,807
-35% to -40%	19,928	(\$155)	1,621	0	\$0	0	19,928	(\$155)	1,621
-30% to -35%	27,248	(\$98)	1,218	0	\$0	0	27,248	(\$98)	1,218
-25% to -30%	31,044	(\$74)	1,141	949	(\$70)	1,697	31,993	(\$74)	1,158
-20% to -25%	17,894	(\$56)	1,106	2,847	(\$48)	1,437	20,741	(\$55)	1,152
-15% to -20%	40,670	(\$33)	854	2,847	(\$26)	1,110	43,517	(\$33)	871
-10% to -15%	34,976	(\$19)	778	4,609	(\$15)	890	39,586	(\$19)	791
-5% to -10%	35,790	(\$12)	710	5,558	(\$9)	822	41,348	(\$11)	725
0% to -5%	25,758	(\$4)	700	7,321	(\$1)	805	33,079	(\$3)	723
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	33,892	\$3	626	8,270	\$1	711	42,162	\$2	642
5% to 10%	54,905	\$8	601	7,321	\$6	680	62,226	\$8	611
10% to 15%	18,302	\$13	569	7,321	\$8	543	25,622	\$12	562
15% to 20%	18,302	\$16	551	10,981	\$14	580	29,283	\$15	562
20% to 25%	14,641	\$20	503	7,321	\$14	519	21,962	\$18	508
25% to 30%	31,989	\$21	467	0	\$0	0	31,989	\$21	467
30% to 35%	36,603	\$26	508	7,321	\$21	530	43,924	\$25	512
35% to 40%	18,302	\$28	487	10,981	\$21	492	29,283	\$25	489
40% to 45%	40,264	\$30	461	7,321	\$22	482	47,585	\$29	464
45% to 50%	17,348	\$27	354	3,660	\$23	478	21,008	\$26	376
50% to 60%	24,668	\$34	410	7,321	\$23	425	31,989	\$31	414
60% to 70%	25,467	\$32	331	0	\$0	0	25,467	\$32	331
70% to 80%	50,933	\$34	306	12,733	\$25	327	63,667	\$32	310
80% to 90%	76,400	\$34	280	16,394	\$30	346	92,794	\$34	291
90% to 100%	38,200	\$35	256	0	\$0	0	38,200	\$35	256
100% to 125%	101,867	\$35	218	0	\$0	0	101,867	\$35	218
125% to 150%	50,933	\$36	180	6,367	\$28	214	57,300	\$35	184
150% to 200%	38,200	\$36	149	38,200	\$30	171	76,400	\$33	160
Greater than 200%	95,500	\$36	68	19,100	\$29	110	114,600	\$35	75
Total	1,030,482	\$8	494	194,741	\$18	441	1,225,203	\$9	486

TURN DATA REQUEST
 TURN-SDG&E-DR-03
 RATE REFORM OIR – R.12-06-013
 SDG&E RESPONSE
 DATE RECEIVED: July 2, 2013
 DATE RESPONDED: July 22, 2013

2. Distribution recovery through demand differentiated BSF

I. With commodity flat rate (Summer)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$26, which would be about \$5.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$23, which would be about \$4.60 per transitional step in the 5-step progression.

% Impact Range	<i>Non-CARE</i>			<i>CARE</i>			<i>Combined</i>		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	0	\$0	0	0	\$0	0	0	\$0	0
-45% to -50%	949	(\$967)	6,708	0	\$0	0	949	(\$967)	6,708
-40% to -45%	1,898	(\$302)	2,626	0	\$0	0	1,898	(\$302)	2,626
-35% to -40%	16,132	(\$178)	1,820	0	\$0	0	16,132	(\$178)	1,820
-30% to -35%	18,030	(\$128)	1,551	0	\$0	0	18,030	(\$128)	1,551
-25% to -30%	29,281	(\$83)	1,216	0	\$0	0	29,281	(\$83)	1,216
-20% to -25%	39,992	(\$49)	958	2,847	(\$51)	1,412	42,839	(\$49)	988
-15% to -20%	35,112	(\$30)	793	7,456	(\$27)	1,052	42,568	(\$30)	839
-10% to -15%	37,010	(\$22)	836	9,219	(\$12)	695	46,228	(\$20)	808
-5% to -10%	48,533	(\$10)	669	1,898	(\$11)	1,042	50,431	(\$10)	683
0% to -5%	39,450	(\$3)	677	7,321	(\$4)	667	46,771	(\$3)	675
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	32,130	\$3	619	3,660	\$0	460	35,790	\$3	602
5% to 10%	23,860	\$8	588	18,302	\$6	669	42,162	\$7	623
10% to 15%	37,547	\$12	517	3,660	\$11	587	41,208	\$11	524
15% to 20%	19,251	\$17	544	7,321	\$11	572	26,571	\$15	552
20% to 25%	31,989	\$19	471	10,981	\$15	557	42,970	\$18	493
25% to 30%	39,310	\$22	493	0	\$0	0	39,310	\$22	493
30% to 35%	54,749	\$20	397	3,660	\$16	428	58,410	\$20	399
35% to 40%	47,429	\$19	338	20,054	\$16	403	67,483	\$18	358
40% to 45%	17,348	\$25	408	13,687	\$17	391	31,035	\$21	400
45% to 50%	36,448	\$25	357	10,027	\$21	420	46,475	\$25	371
50% to 60%	94,702	\$25	303	13,687	\$22	357	108,389	\$24	310
60% to 70%	99,160	\$26	274	16,394	\$14	207	115,554	\$24	265
70% to 80%	25,467	\$22	200	12,733	\$14	195	38,200	\$19	198
80% to 90%	58,254	\$29	235	6,367	\$13	152	64,621	\$27	227
90% to 100%	25,467	\$28	208	0	\$0	0	25,467	\$28	208
100% to 125%	44,567	\$23	140	19,100	\$15	142	63,667	\$20	141
125% to 150%	19,100	\$29	141	0	\$0	0	19,100	\$29	141
150% to 200%	25,467	\$16	51	6,367	\$23	116	31,833	\$17	64
Greater than 200%	31,833	\$26	70	0	\$0	0	31,833	\$26	70
Total	1,030,482	\$3	484	194,741	\$10	441	1,225,203	\$4	486

TURN DATA REQUEST
 TURN-SDG&E-DR-03
 RATE REFORM OIR – R.12-06-013
 SDG&E RESPONSE
 DATE RECEIVED: July 2, 2013
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2. Distribution recovery through demand differentiated BSF

II. With commodity TOU rate (Summer)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$26, which would be about \$5.20 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$21, which would be about \$4.20 per transitional step in the 5-step progression.

% Impact Range	<i>Non-CARE</i>			<i>CARE</i>			<i>Combined</i>		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	949	(\$1,007)	6,708	0	\$0	0	949	(\$1,007)	6,708
-45% to -50%	4,609	(\$116)	1,048	0	\$0	0	4,609	(\$116)	1,048
-40% to -45%	8,405	(\$147)	1,351	0	\$0	0	8,405	(\$147)	1,351
-35% to -40%	14,099	(\$146)	1,529	0	\$0	0	14,099	(\$146)	1,529
-30% to -35%	20,741	(\$111)	1,386	0	\$0	0	20,741	(\$111)	1,386
-25% to -30%	30,909	(\$76)	1,154	0	\$0	0	30,909	(\$76)	1,154
-20% to -25%	28,062	(\$55)	1,028	5,558	(\$29)	954	33,620	(\$51)	1,016
-15% to -20%	32,400	(\$32)	845	5,558	(\$21)	822	37,959	(\$31)	841
-10% to -15%	57,345	(\$22)	818	9,219	(\$15)	782	66,563	(\$21)	813
-5% to -10%	43,111	(\$10)	685	6,507	(\$10)	898	49,618	(\$10)	713
0% to -5%	37,688	(\$3)	682	5,558	(\$1)	700	43,246	(\$3)	684
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	42,162	\$2	583	7,321	\$1	592	49,482	\$2	584
5% to 10%	22,911	\$8	540	7,321	\$6	640	30,232	\$7	564
10% to 15%	34,836	\$12	525	3,660	\$7	545	38,496	\$11	527
15% to 20%	21,957	\$16	479	10,981	\$17	684	32,938	\$16	547
20% to 25%	44,722	\$15	403	7,321	\$15	543	52,043	\$15	423
25% to 30%	58,410	\$18	418	0	\$0	0	58,410	\$18	418
30% to 35%	44,722	\$19	387	23,714	\$14	406	68,437	\$17	394
35% to 40%	18,302	\$29	491	13,687	\$14	376	31,989	\$22	442
40% to 45%	22,760	\$16	272	3,660	\$30	593	26,421	\$18	317
45% to 50%	56,502	\$26	363	10,027	\$24	443	66,529	\$26	375
50% to 60%	90,087	\$23	288	3,660	\$31	535	93,748	\$23	298
60% to 70%	83,721	\$23	251	16,394	\$17	238	100,114	\$22	249
70% to 80%	39,154	\$28	265	6,367	\$12	155	45,521	\$26	250
80% to 90%	38,200	\$28	229	22,760	\$18	214	60,960	\$24	224
90% to 100%	25,467	\$23	162	12,733	\$16	162	38,200	\$21	162
100% to 125%	31,833	\$21	143	6,367	\$11	103	38,200	\$20	136
125% to 150%	19,100	\$28	141	0	\$0	0	19,100	\$28	141
150% to 200%	25,467	\$16	51	6,367	\$21	116	31,833	\$17	64
Greater than 200%	31,833	\$26	70	0	\$0	0	31,833	\$26	70
Total	1,080,482	\$1	484	194,741	\$10	441	1,225,208	\$8	486

TURN DATA REQUEST
TURN-SDG&E-DR-03
RATE REFORM OIR – R.12-06-013
SDG&E RESPONSE
DATE RECEIVED: July 2, 2013
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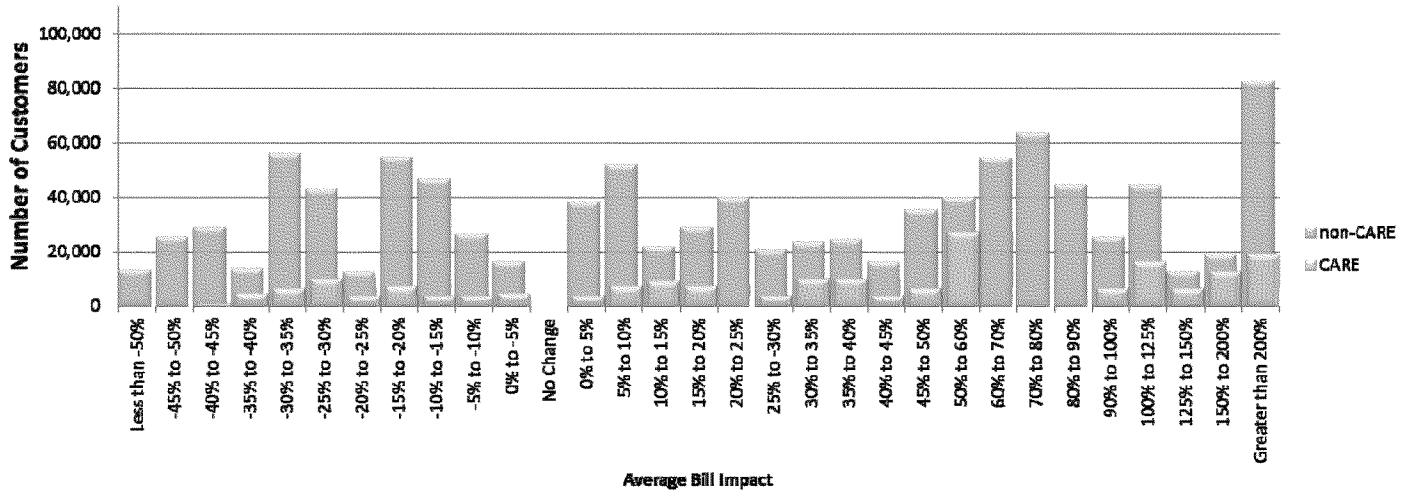
WINTER: STEP 5 VERSUS CURRENT BILL IMPACT GRAPHS

I. Distribution recovery through a basic service fee (BSF)

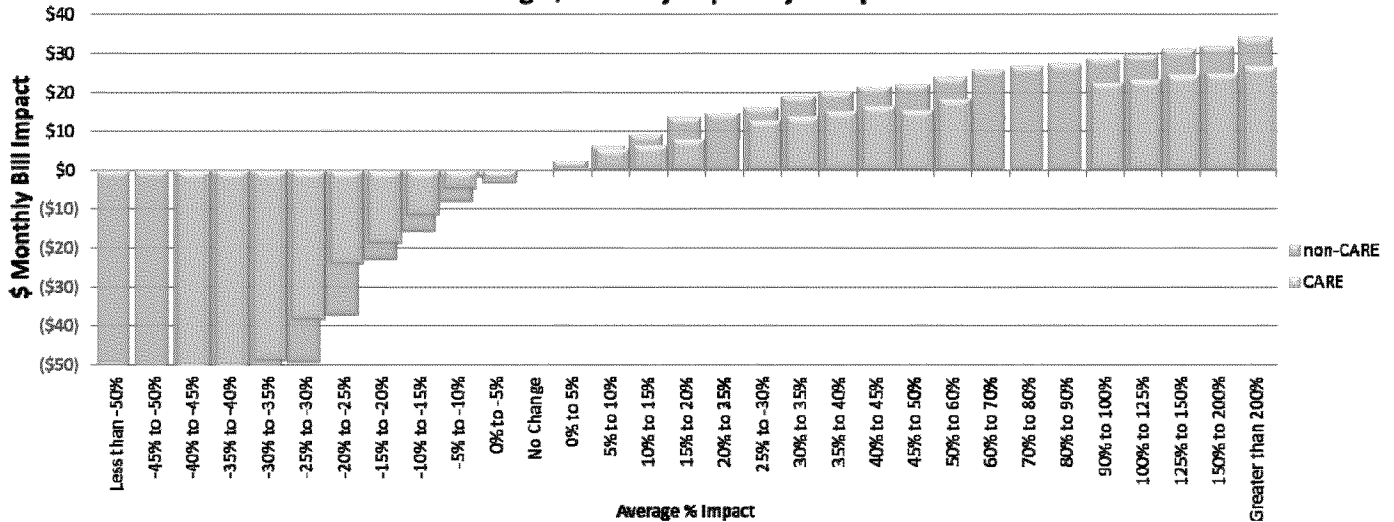
I. With commodity flat rate (Winter)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$34, which would be about \$6.80 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$27, which would be about \$5.40 per transitional step in the 5-step progression.

Number of Customers by % Impact



Average \$ Monthly Impact by % Impact

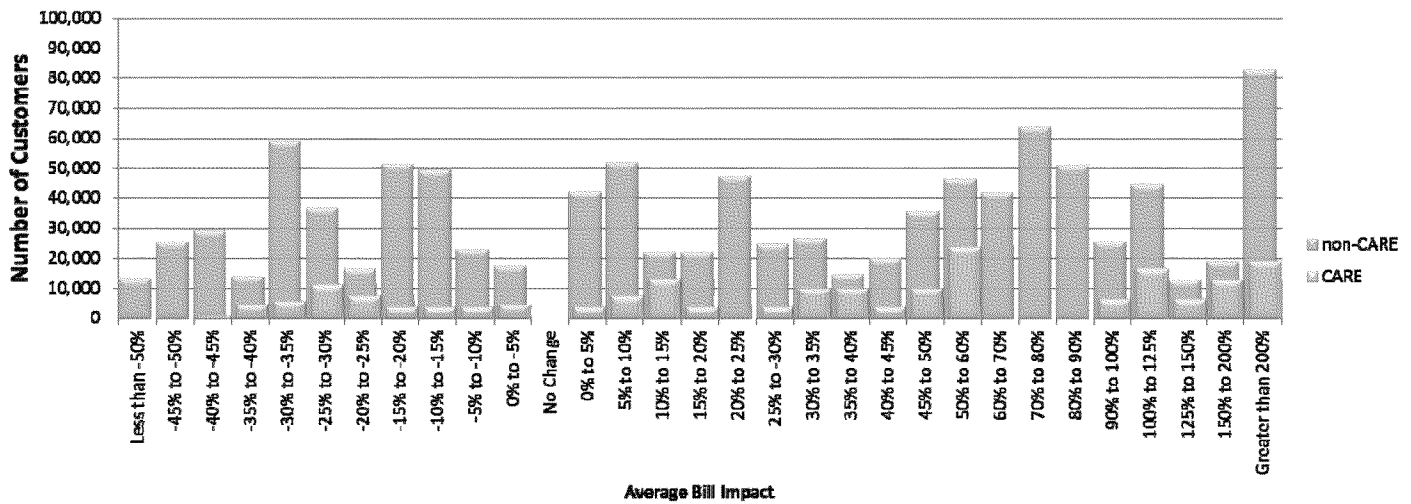


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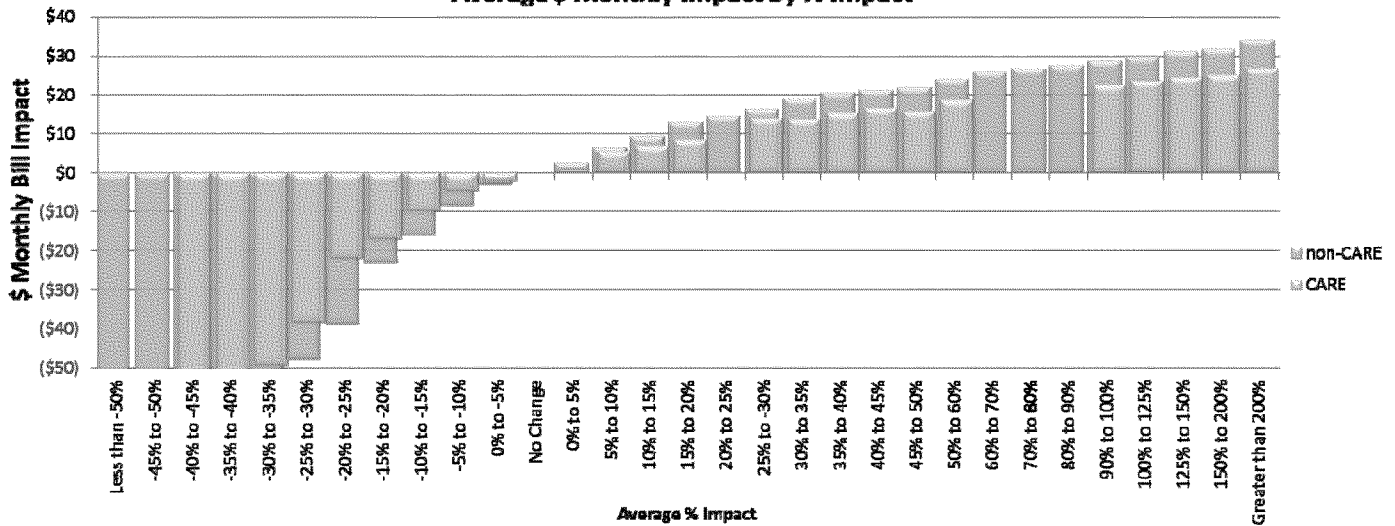
- I. Distribution recovery through a basic service fee (BSF)
- II. With commodity TOU rate (Winter)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$34, which would be about \$6.80 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$27, which would be about \$5.40 per transitional step in the 5-step progression.

Number of Customers by % Impact



Average \$ Monthly Impact by % Impact



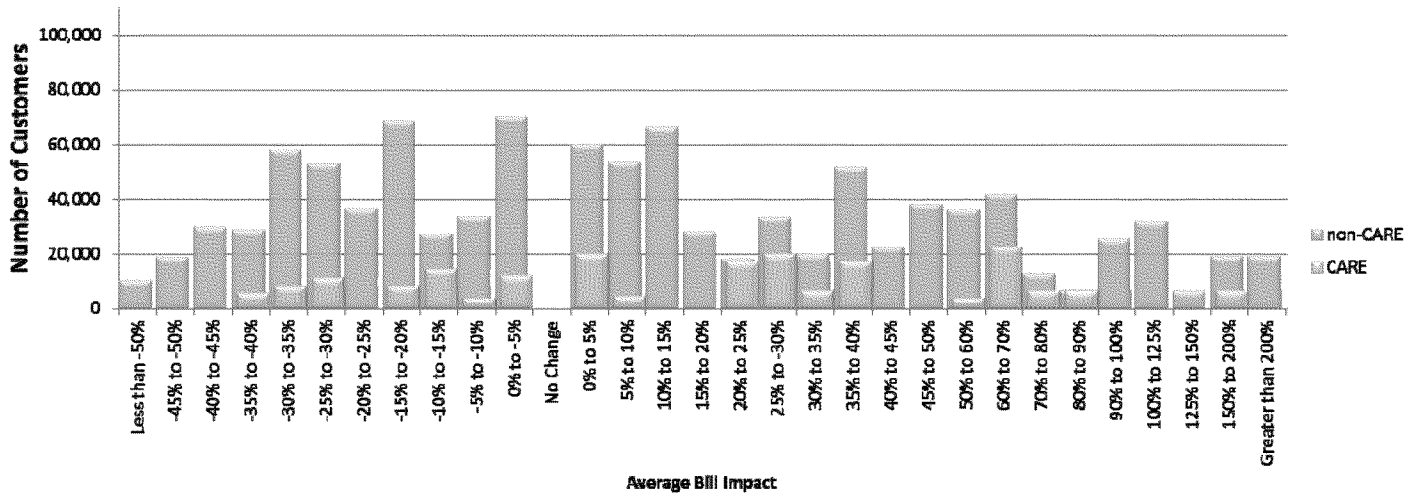
TURN DATA REQUEST
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SDG&E RESPONSE
DATE RECEIVED: July 2, 2013
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2. Distribution recovery through demand differentiated BSF

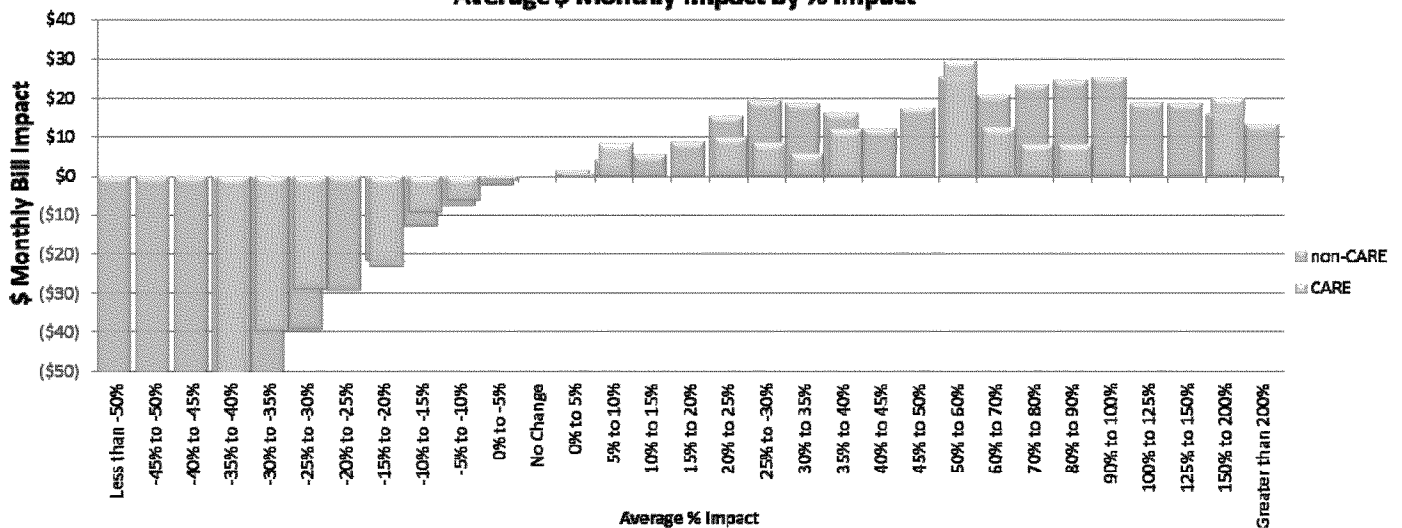
I. With commodity flat rate (Winter)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$13, which would be about \$2.60 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$20, which would be about \$4.00 per transitional step in the 5-step progression.

Number of Customers by % Impact



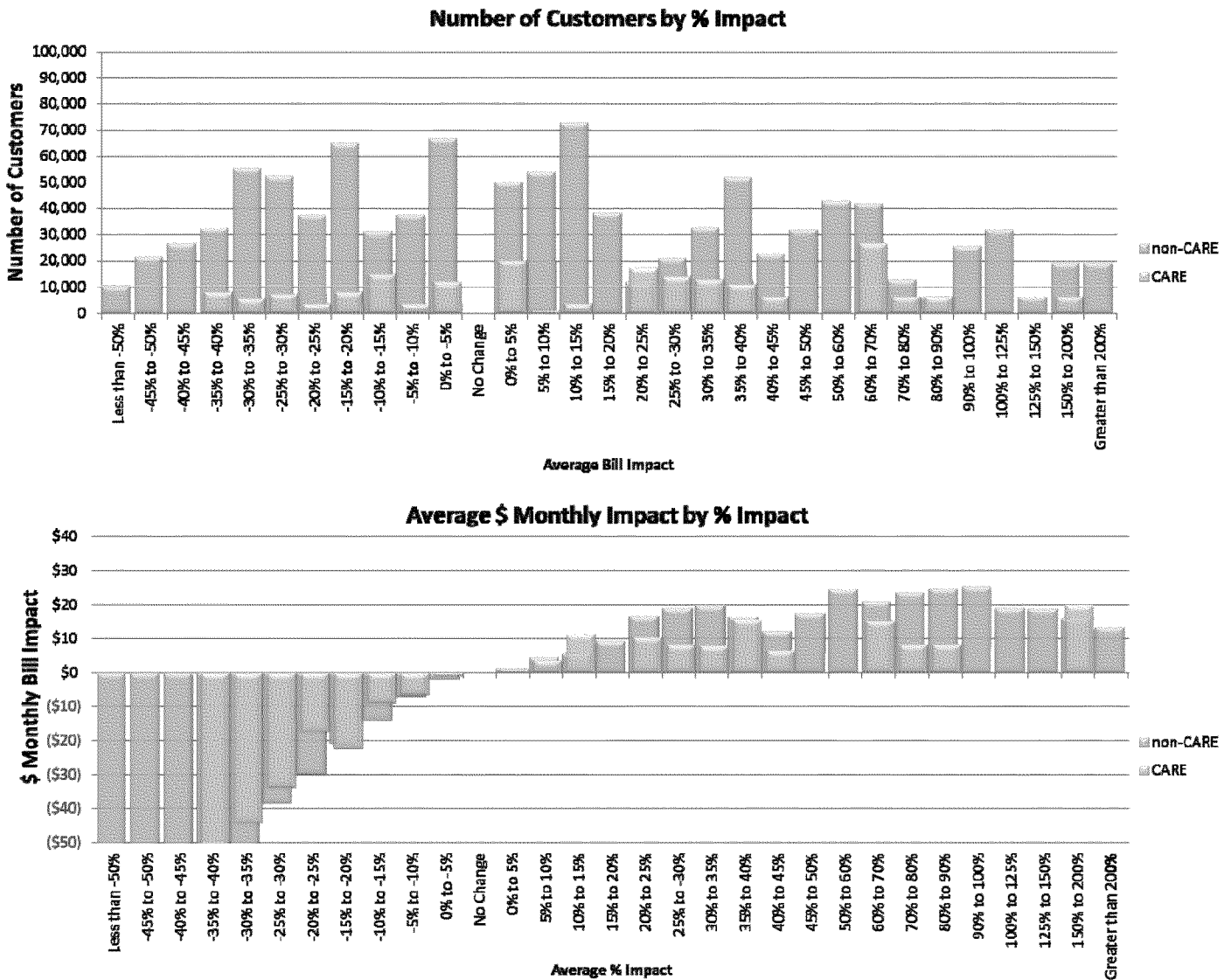
Average \$ Monthly Impact by % Impact



TURN DATA REQUEST
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2. Distribution recovery through demand differentiated BSF
 - II. With commodity TOU rate (Winter)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$13, which would be about \$2.60 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$20, which would be about \$4.00 per transitional step in the 5-step progression.



TURN DATA REQUEST
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 SDG&E RESPONSE
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WINTER: STEP 5 VERSUS CURRENT ILLUSTRATIVE DATA TABLES

- I. Distribution recovery through a basic service fee (BSF)
 - I. With commodity flat rate (Winter)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$34, which would be about \$6.80 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$27, which would be about \$5.40 per transitional step in the 5-step progression.

% Impact Range	Non-CARE			CARE			Combined		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	13,285	(\$364)	2,555	0	\$0	0	13,285	(\$364)	2,555
-45% to -50%	25,621	(\$178)	1,575	0	\$0	0	25,621	(\$178)	1,575
-40% to -45%	29,281	(\$116)	1,204	949	(\$105)	1,705	30,230	(\$116)	1,220
-35% to -40%	13,963	(\$82)	1,000	4,609	(\$76)	1,391	18,572	(\$81)	1,097
-30% to -35%	56,396	(\$58)	863	6,507	(\$49)	1,161	62,903	(\$57)	893
-25% to -30%	43,246	(\$49)	899	10,167	(\$38)	1,045	53,413	(\$47)	927
-20% to -25%	12,879	(\$37)	905	3,660	(\$24)	811	16,539	(\$34)	884
-15% to -20%	55,041	(\$23)	704	7,321	(\$19)	750	62,361	(\$23)	710
-10% to -15%	46,766	(\$16)	661	3,660	(\$12)	853	50,426	(\$15)	674
-5% to -10%	26,707	(\$8)	662	3,660	(\$5)	527	30,367	(\$8)	645
0% to -5%	16,539	(\$2)	547	4,609	(\$3)	749	21,149	(\$2)	591
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	38,496	\$2	608	3,660	\$1	564	42,157	\$2	604
5% to 10%	52,043	\$6	565	7,321	\$6	519	59,364	\$6	560
10% to 15%	21,962	\$9	466	9,219	\$7	504	31,181	\$9	477
15% to 20%	29,283	\$14	496	7,321	\$8	472	36,603	\$13	491
20% to 25%	40,108	\$15	395	0	\$0	0	40,108	\$15	395
25% to 30%	21,008	\$16	394	3,660	\$13	510	24,668	\$16	411
30% to 35%	23,714	\$19	402	10,027	\$14	435	33,741	\$18	412
35% to 40%	24,668	\$20	360	10,027	\$15	426	34,695	\$19	379
40% to 45%	16,394	\$22	349	3,660	\$17	386	20,054	\$21	355
45% to 50%	35,494	\$22	316	6,367	\$16	296	41,860	\$21	313
50% to 60%	40,108	\$24	304	27,375	\$19	327	67,483	\$22	313
60% to 70%	54,594	\$26	276	0	\$0	0	54,594	\$26	276
70% to 80%	63,667	\$27	257	0	\$0	0	63,667	\$27	257
80% to 90%	44,567	\$28	227	0	\$0	0	44,567	\$28	227
90% to 100%	25,467	\$29	212	6,367	\$23	231	31,833	\$28	216
100% to 125%	44,567	\$30	190	16,394	\$24	207	60,960	\$28	195
125% to 150%	12,733	\$31	162	6,367	\$25	177	19,100	\$29	167
150% to 200%	19,100	\$32	142	12,733	\$25	164	31,833	\$29	150
Greater than 200%	82,767	\$34	59	19,100	\$27	107	101,867	\$33	68
Total	1,030,482	(\$7)	518	194,741	\$6	462	1,225,208	(\$4)	509

TURN DATA REQUEST
 TURN-SDG&E-DR-03
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 SDG&E RESPONSE
 DATE RECEIVED: July 2, 2013
 DATE RESPONDED: July 22, 2013

I. Distribution recovery through a basic service fee (BSF)

II. With commodity TOU rate (Winter)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$34, which would be about \$6.80 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$27, which would be about \$5.40 per transitional step in the 5-step progression.

% Impact Range	<i>Non-CARE</i>			<i>CARE</i>			<i>Combined</i>		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	13,285	(\$363)	2,555	0	\$0	0	13,285	(\$363)	2,555
-45% to -50%	25,621	(\$177)	1,575	0	\$0	0	25,621	(\$177)	1,575
-40% to -45%	29,281	(\$116)	1,204	949	(\$105)	1,705	30,230	(\$115)	1,220
-35% to -40%	13,963	(\$80)	977	4,609	(\$76)	1,391	18,572	(\$79)	1,080
-30% to -35%	59,107	(\$59)	881	5,558	(\$49)	1,194	64,665	(\$58)	908
-25% to -30%	36,874	(\$48)	875	11,116	(\$38)	1,038	47,991	(\$46)	913
-20% to -25%	16,539	(\$39)	918	7,321	(\$22)	782	23,860	(\$34)	876
-15% to -20%	51,380	(\$23)	704	3,660	(\$17)	748	55,041	(\$23)	707
-10% to -15%	49,477	(\$16)	665	3,660	(\$10)	853	53,138	(\$15)	678
-5% to -10%	23,046	(\$8)	665	3,660	(\$5)	527	26,707	(\$8)	646
0% to -5%	17,488	(\$3)	572	4,609	(\$2)	749	22,097	(\$3)	609
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	42,157	\$3	601	3,660	\$0	564	45,817	\$3	598
5% to 10%	52,043	\$7	565	7,321	\$6	519	59,364	\$7	560
10% to 15%	21,962	\$10	466	12,879	\$7	496	34,841	\$9	477
15% to 20%	21,962	\$13	490	3,660	\$9	471	25,622	\$13	487
20% to 25%	47,429	\$15	414	0	\$0	0	47,429	\$15	414
25% to 30%	24,668	\$17	395	3,660	\$14	510	28,329	\$16	410
30% to 35%	26,421	\$19	388	10,027	\$14	435	36,448	\$18	401
35% to 40%	14,641	\$21	363	10,027	\$16	426	24,668	\$19	389
40% to 45%	20,054	\$21	354	3,660	\$17	386	23,714	\$21	359
45% to 50%	35,494	\$22	316	10,027	\$16	296	45,521	\$21	312
50% to 60%	46,475	\$24	302	23,714	\$19	331	70,189	\$22	312
60% to 70%	41,860	\$26	275	0	\$0	0	41,860	\$26	275
70% to 80%	63,667	\$27	260	0	\$0	0	63,667	\$27	260
80% to 90%	50,933	\$28	228	0	\$0	0	50,933	\$28	228
90% to 100%	25,467	\$29	212	6,367	\$23	231	31,833	\$28	216
100% to 125%	44,567	\$30	190	16,394	\$24	207	60,960	\$28	195
125% to 150%	12,733	\$31	162	6,367	\$25	177	19,100	\$29	167
150% to 200%	19,100	\$32	142	12,733	\$25	164	31,833	\$29	150
Greater than 200%	82,767	\$34	59	19,100	\$27	107	101,867	\$33	68
Total	1,030,482	(\$6)	518	194,741	\$7	462	1,225,203	(\$4)	509

TURN DATA REQUEST
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 SDG&E RESPONSE
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2. Distribution recovery through demand differentiated BSF

I. With commodity flat rate (Winter)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$13, which would be about \$2.60 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$20, which would be about \$4.00 per transitional step in the 5-step progression.

% Impact Range	<i>Non-CARE</i>			<i>CARE</i>			<i>Combined</i>		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	10,438	(\$358)	2,572	0	\$0	0	10,438	(\$358)	2,572
-45% to -50%	18,843	(\$160)	1,431	0	\$0	0	18,843	(\$160)	1,431
-40% to -45%	30,095	(\$124)	1,250	0	\$0	0	30,095	(\$124)	1,250
-35% to -40%	29,011	(\$93)	1,111	5,558	(\$75)	1,401	34,569	(\$90)	1,158
-30% to -35%	58,158	(\$58)	851	8,270	(\$40)	877	66,428	(\$56)	854
-25% to -30%	53,273	(\$39)	720	11,116	(\$29)	786	64,389	(\$37)	732
-20% to -25%	36,739	(\$29)	678	0	\$0	0	36,739	(\$29)	678
-15% to -20%	68,723	(\$21)	660	8,270	(\$23)	1,034	76,992	(\$22)	700
-10% to -15%	27,515	(\$13)	585	14,636	(\$9)	627	42,151	(\$12)	600
-5% to -10%	33,887	(\$8)	578	3,660	(\$6)	564	37,547	(\$8)	576
0% to -5%	70,480	(\$2)	539	11,930	(\$1)	472	82,410	(\$2)	529
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	60,308	\$2	489	20,054	\$1	401	80,362	\$1	467
5% to 10%	53,926	\$4	383	4,609	\$9	784	58,535	\$5	415
10% to 15%	66,529	\$6	313	0	\$0	0	66,529	\$6	313
15% to 20%	28,324	\$9	344	0	\$0	0	28,324	\$9	344
20% to 25%	18,297	\$16	480	17,348	\$10	454	35,644	\$13	467
25% to 30%	33,741	\$20	459	20,054	\$9	328	53,795	\$16	410
30% to 35%	20,054	\$19	398	6,367	\$6	177	26,421	\$16	344
35% to 40%	51,887	\$16	293	17,348	\$12	300	69,235	\$15	295
40% to 45%	22,760	\$12	200	0	\$0	0	22,760	\$12	200
45% to 50%	38,200	\$18	258	0	\$0	0	38,200	\$18	258
50% to 60%	36,448	\$26	322	3,660	\$30	510	40,108	\$26	339
60% to 70%	41,860	\$21	228	22,760	\$13	196	64,621	\$18	217
70% to 80%	12,733	\$24	215	6,367	\$8	106	19,100	\$19	179
80% to 90%	6,367	\$25	194	6,367	\$8	103	12,733	\$17	148
90% to 100%	25,467	\$25	191	0	\$0	0	25,467	\$25	191
100% to 125%	31,833	\$19	112	0	\$0	0	31,833	\$19	112
125% to 150%	6,367	\$19	97	0	\$0	0	6,367	\$19	97
150% to 200%	19,100	\$16	41	6,367	\$20	111	25,467	\$17	59
Greater than 200%	19,100	\$13	21	0	\$0	0	19,100	\$13	21
Total	1,030,482	(\$13)	518	194,741	(\$1)	462	1,225,203	(\$11)	509

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2. Distribution recovery through demand differentiated BSF

II. With commodity TOU rate (Winter)

The non-CARE customers in this sample seeing above 200% change from current as compared to step 5 would see an average monthly impact of \$13, which would be about \$2.60 per transitional step in the 5-step progression. The CARE customers in this sample seeing above 150% change from current as compared to step 5 would see an average monthly impact of \$20, which would be about \$4.00 per transitional step in the 5-step progression.

% Impact Range	<i>Non-CARE</i>			<i>CARE</i>			<i>Combined</i>		
	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh	Number of Customers	Avg. Monthly \$ Impact	Avg. Monthly kWh
Less than -50%	10,438	(\$357)	2,572	0	\$0	0	10,438	(\$357)	2,572
-45% to -50%	21,555	(\$148)	1,335	0	\$0	0	21,555	(\$148)	1,335
-40% to -45%	26,435	(\$130)	1,312	0	\$0	0	26,435	(\$130)	1,312
-35% to -40%	32,671	(\$87)	1,056	8,270	(\$61)	1,164	40,941	(\$81)	1,077
-30% to -35%	55,447	(\$60)	872	5,558	(\$44)	975	61,005	(\$58)	881
-25% to -30%	52,324	(\$38)	711	7,456	(\$34)	913	59,780	(\$38)	736
-20% to -25%	37,688	(\$30)	693	3,660	(\$17)	527	41,348	(\$29)	678
-15% to -20%	65,062	(\$21)	646	8,270	(\$22)	1,034	73,332	(\$21)	689
-10% to -15%	31,176	(\$14)	625	14,636	(\$9)	627	45,812	(\$13)	626
-5% to -10%	37,547	(\$7)	569	3,660	(\$7)	564	41,208	(\$7)	568
0% to -5%	66,820	(\$2)	542	11,930	(\$1)	472	78,750	(\$2)	531
No Change	0	\$0	0	0	\$0	0	0	\$0	0
0% to 5%	50,281	\$1	468	20,054	\$1	401	70,335	\$1	449
5% to 10%	53,926	\$5	428	949	\$4	518	54,875	\$4	430
10% to 15%	72,895	\$6	320	3,660	\$12	853	76,556	\$6	346
15% to 20%	38,351	\$9	354	0	\$0	0	38,351	\$9	354
20% to 25%	11,930	\$17	494	17,348	\$11	454	29,278	\$13	471
25% to 30%	21,008	\$19	458	13,687	\$8	323	34,695	\$15	405
30% to 35%	32,787	\$20	422	12,733	\$8	257	45,521	\$17	376
35% to 40%	51,887	\$17	293	10,981	\$16	380	62,868	\$16	308
40% to 45%	22,760	\$12	200	6,367	\$7	161	29,127	\$11	191
45% to 50%	31,833	\$18	257	0	\$0	0	31,833	\$18	257
50% to 60%	42,814	\$25	312	0	\$0	0	42,814	\$25	312
60% to 70%	41,860	\$21	228	26,421	\$15	239	68,281	\$19	232
70% to 80%	12,733	\$24	215	6,367	\$8	106	19,100	\$19	179
80% to 90%	6,367	\$25	194	6,367	\$8	103	12,733	\$17	148
90% to 100%	25,467	\$25	191	0	\$0	0	25,467	\$25	191
100% to 125%	31,833	\$19	112	0	\$0	0	31,833	\$19	112
125% to 150%	6,367	\$19	97	0	\$0	0	6,367	\$19	97
150% to 200%	19,100	\$16	41	6,367	\$20	111	25,467	\$17	59
Greater than 200%	19,100	\$13	21	0	\$0	0	19,100	\$13	21
Total	1,030,482	(\$13)	518	194,741	(\$0)	462	1,225,203	(\$11)	509

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RATE REFORM OIR -- R.12-06-013
SDG&E RESPONSE
DATE RECEIVED: July 2, 2013
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5. What percentage of SDG&E residential customers are expected to fall into each of the proposed Demand-differentiated basic service fee categories shown in Table 2?

SDG&E Response 05:

Based on the SDG&E data sample used in this proceeding, the percent of bill-months in each of the 3 demand differentiated basic service fee categories are as follows:

Non-Coincident^L Demand Range	% of Bill¹ Months
0 to <3 kW	34%
3 to <7 kW	48%
7 kW and above	19%