

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

Order Instituting Rulemaking to Enhance the Role of  
Demand Response in Meeting the State's Resource  
Planning Needs and Operational Requirements

R.13-09-011  
(Filed September 19, 2013)

**LIST OF MATERIAL ISSUES OF FACT IN DISPUTE THAT NEED TO BE  
ADDRESSED IN HEARINGS SUBMITTED BY SAN DIEGO GAS & ELECTRIC  
COMPANY (U 902 E) PURSUANT TO SCOPING RULING**

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May 20, 2014

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Pursuant to the Joint Assigned Commissioner and Administrative Law Judge Ruling and Revised Scoping Memo Rule issued April 2, 2014, as amended by the E-Mail Ruling Granting Limited Extension Of Time To Serve Rebuttal Testimony issued May 16, 2014, San Diego Gas & Electric Company ("SDG&E") hereby submits its List of Material Issues of Fact in Dispute that Need to be Addressed in Hearings:

- Whether or not an adequate basis exists for setting goals for SDG&E with respect to DR at this time.
- The kinds of goals that should be set for SDG&E with respect to DR, if any.
- Whether or not there is a clear set of policy objectives and supporting analysis to form the basis for DR goals for SDG&E.
- Whether 5% of SDG&E's load share of system peak is an appropriate goal for supply-side price-responsive DR.
- The basis for defining an appropriate MW goal for supply-side price-responsive DR.
- Whether or not SDG&E collects "the vast majority" of its DR budget in distribution rates.
- Who benefits from load-modifying DR?
- Whether or not SDG&E integrating DR into its procurement activities will change the level of supply-side price-responsive DR.
- Whether or not more market experience is needed before complete migration of programs into the wholesale markets.
- Whether SDG&E's current level of supply-side price responsive DR is 2.5% of SDG&E's load share of system peak.

- Whether procurement of supply-side DR in the SDG&E service area has to be “utility-centric.”
- Whether the RA value of load modifying DR should be determined by historical performance or a prospective forecast of expected contribution to peak reduction.
- Whether a larger error band to measure the performance DR integrating into the CASIO markets is appropriate.
- Whether the DRAM is simply an RFO and redundant of SDG&E’s preferred resources RFO mechanism.
- Whether DRAM should include separate products for flexible, system, and local capacity for each local area DR RA to provide a more “auctionable” product.
- What are the required characteristics for DR to count for local RA, including delivery period?
- Whether the DRAM eligibility requirements are appropriate.
- Whether the standard contract terms in the DRAM proposal are sufficient.
- Whether the DRAM penalty provisions are fair to all parties.
- Whether the DRAM protections from market manipulation are adequate
- Whether the DRAM price cap is inefficient.
- Whether the DRAM proposal is implementable in 2015 given the vast amount of unresolved issues in other proceedings.
- Whether load-modifying DR should receive capacity value in cost effectiveness analysis.
- The appropriate capacity credit for load-modifying DR.

SDG&E appreciates the opportunity to submit the forgoing List of Material Issues of

Fact in Dispute that Need to be Addressed in Hearings herein.

Dated: May 20, 2014

Respectfully submitted

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