

**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)

**REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) ON
PROPOSED DECISION APPROVING DEMAND RESPONSE PROGRAM
IMPROVEMENTS AND 2015-2016 BRIDGE FUNDING BUDGET**

Thomas R. Brill
Attorney for
SAN DIEGO GAS & ELECTRIC COMPANY
8306 Century Park Ct
San Diego, CA 92123-1530
Phone: (858) 654-1601
Fax: (858) 654-1878
E-Mail: TBrill@semprautilities.com

May 12, 2014

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Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, San Diego Gas & Electric Company ("SDG&E") respectfully replies to comments of parties to Administrative Law Judge Hyme's Proposed Decision Approving Demand Response Program Improvements and 2015-2016 Bridge Funding Budget ("PD"). SDG&E's reply specifically addresses the comments of the Office of Ratepayer Advocates ("ORA") regarding the PD's reporting requirements.

In its comments, at page 2, ORA reiterated its recommendation to establish: "...weekly exception reporting to clearly identify and describe each instance a DR program is economic to dispatch and yet not utilized in favor of a non-DR resource." and indicated that: "ORA supports the adoption of this proposal by the PD and looks forward to working with Energy Division, the utilities and other interested stakeholders to finalize a reporting template."

SDG&E previously identified and addressed its concerns with respect to the PD's provisions regarding the development of a reporting template in its Opening Comments filed on May 5, 2014, at pages 2 – 4, and incorporates those comments herein by reference. SDG&E further notes that an added complexity with respect to the development of a reporting template involves the confidentiality of certain data that is identified in the draft template in Attachment 1 of the PD. SDG&E believes that the Commission must and urges the Commission to explicitly address this confidentiality of data issue and establish appropriate safeguards concerning the data

to be provided to insure there is no adverse impact on ratepayers resulting from such data being reported. Specifically, SDG&E submits that any data ultimately identified for inclusion in the template that could disclose sensitive or proprietary operational or price information, enable a third party to “reverse-engineer” operational decisions or price points, or that would result in increased costs to SDG&E’s ratepayers, must be specifically determined in this decision by the Commission to be required in such reporting and, if so required, must be afforded the highest degree of confidentiality protection. SDG&E is not opposed to an appropriate level of reporting that will demonstrate an appropriate level of transparency, but is opposed to any data reporting that would compromise operational considerations or introduce unnecessary risks or costs to ratepayers.

SDG&E looks forward to working with Energy Division, ORA, the utilities and other stakeholders in finalizing a reporting template. However, SDG&E reiterates its position articulated in its Opening Comments that a more reasonable expectation for the filing of a draft proposed template is 30 days following the agreement amongst parties on an acceptable reporting template. To the extent that parties request a time extension greater than 30 days from that date, SDG&E would be in full agreement.

Dated this 12th of May, 2014.

Respectfully submitted

By /s/ Thomas R. Brill
THOMAS R. BRILL
Attorney for

SAN DIEGO GAS & ELECTRIC COMPANY
8306 Century Park Ct
San Diego, CA 92123-1530
Phone: (858) 654-1601
Fax: (858) 654-1878
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