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Application: A.21-12-006/A.21-12-008
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PREPARED SUPPLEMENTAL DIRECT TESTIMONY OF
WILLIAM G. SAXE (CHAPTER 3)
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

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

August 15, 2022



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1 **PREPARED SUPPLEMENTAL DIRECT TESTIMONY OF**

2 **WILLIAM G. SAXE (CHAPTER 3)**

3 **I. OVERVIEW AND PURPOSE**

4 The purpose of this prepared supplemental direct testimony is to provide modifications to
5 the San Diego Gas & Electric Company (SDG&E) proposed rate design for the Stage 1 real-time
6 pricing (RTP) pilot program (Pilot) that was originally filed in Application (A.) 21-12-006,
7 pursuant to Ordering Paragraph (OP) 6 of Decision (D.) 21-07-010. Assigned Commissioner
8 Genevieve Shiroma issued a scoping memo and ruling on April 18, 2022, that consolidated
9 A.21-12-006 (RTP Application) and A.21-12-008 (Commercial Electric Vehicle Dynamic Rate
10 Application) and directed the Energy Division (ED) to file recommendations to SDG&E for
11 consideration in modifying the RTP Application. The ED filed its RTP Application revised
12 recommendations (ED Staff Recommendations) on July 12, 2022. SDG&E is submitting this
13 prepared supplemental direct testimony to address revisions to SDG&E’s consolidated RTP
14 Application and Commercial Electric Vehicle Dynamic Rate Application, as recommended by
15 the ED. Because the revisions are extensive and include both adding new testimony and
16 removing previously served testimony, SDG&E is withdrawing previously served direct
17 testimony and will rely solely on this prepared supplemental direct testimony as its direct
18 testimony in this proceeding.¹ Additionally, the commodity export compensation pilot
19 (Commodity Export Compensation Pilot) rate design proposed for Schedule EV-HP customers in
20 this prepared supplemental direct testimony replaces the rate design direct testimony submitted
21 by SDG&E witness Ray Utama in the Commercial Electric Vehicle Dynamic Rate Application.

¹ Note that this supplemental direct testimony is replacing the direct testimony submitted by Sam Shannon, a former consultant on this Application, as the rate design witness.

1 This prepared supplemental direct testimony proposes the following changes to the direct
2 testimony originally filed in the RTP Application based on SDG&E’s review and evaluation of
3 the ED Staff Recommendations:

- 4 • **Stage 1 RTP Pilot Commodity Import Rate Design:** as stated in the prepared
5 supplemental direct testimony of SDG&E witness Jeff DeTuri (Chapter 1),
6 SDG&E agrees to expand the eligibility for the Stage 1 RTP Pilot to all customer
7 classes except street lighting instead of just being available to the Medium/Large
8 Commercial & Industrial (M/L C&I) class, as SDG&E originally proposed in its
9 RTP Application direct testimony.² Attachment A presents the Illustrative Stage
10 1 RTP Pilot commodity import rates for all SDG&E customer classes except
11 street lighting.
- 12 • **Commodity Export Compensation Pilot Rate Design:** as stated in the prepared
13 supplemental direct testimony of SDG&E witness Mr. DeTuri, SDG&E agrees
14 with proposing a commodity export compensation rate available to all customer
15 classes except street lighting.³ Attachment B presents the proposed illustrative
16 commodity export compensation credits for all SDG&E customer classes except
17 street lighting.
- 18 • **Illustrative Time-Differentiated Transmission Energy Rates:** as described
19 above, SDG&E is proposing that the Stage 1 RTP Pilot be made available to all
20 customer classes except street lighting. Although most SDG&E electric
21 customers do not currently pay time-differentiated transmission rates, at the
22 recommendation of the ED⁴ and as directed by the California Public Utilities
23 Commission (CPUC or Commission),⁵ SDG&E presents illustrative time-
24 differentiated transmission energy rates in Attachment C.

25 My testimony is organized as follows:

- 26 • **Section I – Overview and Purpose**
- 27 • **Section II – Stage 1 RTP Pilot Commodity Import Rate Design**
- 28 • **Section III – Commodity Export Compensation Pilot Rate Design**

² Supplemental Direct Testimony of Jeff DeTuri (August 15, 2022), in Section II: Regulatory Background.

³ *Id.*

⁴ ED Staff Recommendations, in Section III: Energy Division Recommendation, F. Time Differentiated Transmission.

⁵ D.21-07-010, in Section 5.5: Matters Required to be Addressed in the RTP Pilot Application, at 57-58.

- 1 • **Section IV – Illustrative Time-Differentiated Transmission Energy Rates**
- 2 • **Section V – Summary and Conclusion**
- 3 • **Section VI – Statement of Qualifications**
- 4 • **Attachment A – Illustrative Stage 1 RTP Pilot Commodity Input Rates**
- 5 • **Attachment B – Illustrative Commodity Export Compensation Pilot Credits**
- 6 • **Attachment C – Illustrative Time-Differentiated Transmission Energy Rates**
- 7 • **Attachment D – Current and Proposed Illustrative Total Rates for Eligible**
- 8 **Customers**

9 **II. STAGE 1 RTP PILOT COMMODITY IMPORT RATE DESIGN**

10 Pursuant to D.21-07-010, SDG&E is proposing a two-stage optional RTP Pilot.⁶ As
11 described in the prepared supplemental direct testimony of SDG&E witness Mr. DeTuri,
12 SDG&E is proposing that the Stage 1 RTP Pilot be available to all customer classes except street
13 lighting.⁷ The Stage 1 RTP Pilot commodity import rate design is similar to SDG&E’s existing
14 Schedule Public Grid Integrated Rate (GIR) commodity rate design since, as explained in the
15 prepared supplemental direct testimony of SDG&E witness Ray Utama (Chapter 4), SDG&E’s
16 billing system currently has the functionality to bill a market-based commodity rate similar to
17 GIR.⁸ As shown in Attachment A, the proposed illustrative Stage 1 RTP Pilot commodity
18 import rates consist of three rate design components: (a) the California Independent System
19 Operator (CAISO) day-ahead market (DAM) commodity energy prices; (b) Critical Peak Pricing

⁶ As explained in the Regulatory Background section (Section II) of the supplemental direct testimony of Mr. DeTuri, the Stage 2 RTP Pilot will be proposed two years after the Stage 1 RTP Pilot is implemented. The Stage 2 RTP Pilot, including the Stage 2 RTP Pilot rate design, will be determined based on the evaluation of the Stage 1 RTP Pilot data and results.

⁷ Prepared Supplemental Direct Testimony of Jeff DeTuri (August 15, 2022), in Section II: Regulatory Background.

⁸ Prepared Supplemental Direct Testimony of Ray Utama (August 15, 2022), in Section III: Implementation Costs.

1 (CPP) commodity capacity adder; and (c) total base commodity rate. Each of these rate design
2 components is discussed in more detail below. Also, Attachment D presents the current and
3 proposed illustrative total rates for the seven rate schedules eligible for the Stage 1 RTP Pilot
4 (Residential Class: Schedules TOU-DR1 and EV-TOU-5; Small Commercial Class: Schedule
5 TOU-A; M/L C&I Class: Schedules AL-TOU and A6-TOU; and Agricultural Class: Schedules
6 PA-T-1 and TOU-PA), as addressed in the prepared supplemental direct testimony of SDG&E
7 witness Mr. Utama.⁹

8 **A. CAISO Day-Ahead Energy Price**

9 The first component in the Stage 1 RTP Pilot commodity import rate design is the
10 CAISO day-ahead hourly commodity energy price. SDG&E proposes to incorporate the CAISO
11 day-ahead hourly market price that is based on the hourly Locational Marginal Prices (LMP) at
12 SDG&E's Default Load Aggregation Point (DLAP), derived from the CAISO Open Access
13 Same-time Information System (OASIS) website.¹⁰ As addressed in the prepared supplemental
14 direct testimony of SDG&E witness Mr. DeTuri, the RTP program will pass these hourly
15 commodity signals on to customers.¹¹ The total hourly prices for the next day, which include the
16 CAISO hourly price component, will be posted on SDG&E's website, allowing customers to
17 make decisions about their next day's energy use based on those prices. In the event that the
18 day-ahead price is delayed, the Stage 1 RTP Pilot will use the prior day's hourly rates. SDG&E
19 will display the total hourly price on its website, as described in the prepared supplemental direct

⁹ Prepared Supplemental Direct Testimony of Ray Utama (August 15, 2022), in Section II: Implementation Design.

¹⁰ California ISO, Oasis, available at <http://oasis.caiso.com/mrioasis/logon.do>.

¹¹ Prepared Supplemental Direct Testimony of Jeff DeTuri (August 15, 2022), in Section VI: CAISO Day-Ahead Energy Price.

1 testimony of Mr. Utama.¹² Attachment A identifies that all customer classes will pay the same
2 Stage 1 RTP CAISO day-ahead hourly commodity energy prices.

3 **B. CPP Commodity Capacity Adder**

4 The second component in the Stage 1 RTP Pilot commodity rate design is the CPP
5 commodity capacity adder. The CPP commodity capacity adder will be applied during high-cost
6 pricing periods when SDG&E calls CPP Events to recover assigned commodity capacity-related
7 costs during those events. The CPP Events under the Stage 1 RTP Pilot will be the same CPP
8 Events that SDG&E calls under its existing CPP rates for all customer classes.¹³ In the RTP
9 Application, SDG&E originally proposed a commodity capacity adder based on the top 150
10 SDG&E system peak hours consistent with the commodity capacity adder in GIR. Because
11 SDG&E is now proposing that the Stage 1 RTP Pilot be available to all customer classes except
12 street lighting, and eligible customer classes currently have the option to take service on CPP
13 commodity rates with the CPP Event Day commodity capacity adder applied, SDG&E is
14 proposing the CPP Event Day commodity capacity adder approach applied when SDG&E calls
15 CPP Events.¹⁴ SDG&E believes this already-existing CPP Event Day commodity capacity adder
16 will be more understandable for more customers. In addition, the commodity export
17 compensation credit that SDG&E proposed in the Commercial Electric Vehicle Dynamic Rate
18 Application reflected the marginal cost based CPP Event Day commodity capacity adder.

¹² Prepared Supplemental Direct Testimony of Ray Utama (August 15, 2022), in Section II: Implementation Design.

¹³ The SDG&E CPP type rates for customer classes are TOU-DR-P for residential, TOU-A-P for small commercial, CPP-D for M/L C&I, and CPP-D-AG and TOU-PA-P for agricultural.

¹⁴ Consistent with SDG&E's current CPP commodity rates, CPP Events are effective from 4:00 pm to 9:00 pm and CPP Events can be triggered on any day of the week, year-round, with a maximum of 18 event days per calendar year.

1 Because the RTP Application and Commercial Electric Vehicle Dynamic Rate Application have
2 been consolidated, SDG&E believes that for consistency purposes the same CPP Event Day
3 commodity capacity adder approach should be used in both the proposed Stage 1 RTP Pilot
4 commodity import rate design and the commodity export compensation pilot rate design.
5 Attachment A presents the proposed Illustrative Stage 1 RTP CPP commodity capacity adder by
6 customer class based on SDG&E's current electric rates.¹⁵

7 **C. Total Base Commodity Rate**

8 The third component in the Stage 1 RTP Pilot commodity rate design is the base
9 commodity rate. The proposed base commodity rate is the average commodity rate by customer
10 class adjusted downward to remove the variable CAISO production costs and RTP CPP
11 commodity capacity adder revenues. This base commodity rate ensures that participating Stage
12 1 RTP Pilot customers still contribute to the recovery of the allocated class commodity costs and
13 that RTP customers are not being subsidized by non-participating customers. In addition, like
14 existing class commodity rates, the total base commodity rate for the RTP Pilot includes the
15 recovery of applicable CPP and Schedule DG-R (DG-R) commodity revenue under-/over-
16 collections assigned to each customer class. SDG&E proposes that the applicable CPP and DG-
17 R under-/over-collection rates applied to the Stage 1 RTP Pilot be the class average under-/over-
18 collection rates. Attachment A presents the proposed illustrative Stage 1 RTP total base
19 commodity rate by customer class based on SDG&E's current electric rates.¹⁶

¹⁵ SDG&E's current electric rates were filed on May 16, 2022 in SDG&E Advice Letter 4004-E, effective June 1, 2022 (Advice Letter 4004-E).

¹⁶ *Id.*

1 **III. COMMODITY EXPORT COMPENSATION PILOT RATE DESIGN**

2 As suggested in the ED Staff Recommendations, SDG&E is proposing an optional
3 commodity export compensation pilot credit for all customer classes except street lighting,
4 consistent with the commodity export credit proposed for commercial electric vehicle (EV)
5 customers in the Commercial Electric Vehicle Dynamic Rate Application, as addressed in the
6 prepared supplemental direct testimony of SDG&E witness Mr. DeTuri.¹⁷ SDG&E proposes that
7 the commodity export credit include: (a) CAISO day ahead commodity energy price; and (b)
8 CPP Event Day commodity capacity adder based on marginal costs only. As SDG&E witness
9 Mr. DeTuri states in his prepared supplemental direct testimony, the commodity export
10 compensation credit will initially be available to M/L C&I customers on Schedule EV-HP in
11 Stage 1 of the pilot but will be available to all customer classes except street lighting in Stage 2
12 of the pilot.¹⁸ Attachment B presents the proposed illustrative commodity export credit by
13 customer class based on SDG&E's current electric rates.¹⁹

14 **IV. ILLUSTRATIVE TIME-DIFFERENTIATED TRANSMISSION ENERGY RATES**

15 In D.21-07-010, the Commission directed SDG&E to present the impact of time-
16 differentiated transmission rates in its RTP Application.²⁰ Currently, the only SDG&E
17 customers that pay time-differentiated transmission rates are M/L C&I customers who pay
18 transmission \$/kilowatt (kW) on-peak demand charges. Comparatively, SDG&E's customers
19 with non-time-differentiated transmission \$/kilowatt-hour (kWh) energy rates pay the same

¹⁷ Prepared Supplemental Direct Testimony of Jeff DeTuri (August 15, 2022), in Section II: Regulatory Background.

¹⁸ *Id.*

¹⁹ Advice Letter 4004-E.

²⁰ D.21-07-010, in Section 5.5: Matters Required to be Addressed in the RTP Pilot Application, at 57-58.

1 transmission \$/kWh energy rate regardless of the time of the day the energy is consumed.
2 Because SDG&E is now proposing, pursuant to the ED Staff Recommendations, that the Stage 1
3 RTP Pilot be available to all customer classes except street lighting, SDG&E presents illustrative
4 time-differentiated transmission \$/kWh energy rates for these other customer classes based on
5 the percentage of on-peak costs currently directly assigned to the transmission \$/kW on-peak
6 demand charges of M/L C&I customers. Attachment C presents a comparison of the current
7 2022 non-time-differentiated transmission \$/kWh energy rates to the calculated illustrative 2022
8 time-differentiated transmission \$/kWh energy rates by customer class. SDG&E is not
9 proposing changes to transmission rates in this application. Transmission rate changes fall
10 under the jurisdiction of the Federal Energy Regulatory Commission (FERC) and thus, the time-
11 differentiated transmission \$/kWh energy rates presented in this testimony are not being
12 proposed and purely reflect illustrative time-differentiated transmission \$/kWh energy rates.

13 **V. SUMMARY AND CONCLUSION**

14 SDG&E recommends that the Commission approve the proposed optional Stage 1 RTP
15 commodity import and export compensation pilot rate design described above, rate design used
16 to develop the illustrative rates and credits presented in Attachments A and B, respectively. If
17 this rate design is adopted, the Stage 1 RTP pilot commodity import rates and commodity export
18 compensation pilot credits implemented will be updated to reflect SDG&E's electric rates at the
19 time of implementation.

20 Once a Commission decision is issued in this proceeding, SDG&E will file a tier 2 advice
21 letter to implement the rates and credits adopted. Because the preference is to have fewer rate
22 changes in a given year, if the decision in this proceeding is issued within a few months of
23 SDG&E's January 1st consolidated advice letter filing, SDG&E recommends that the rates and

1 credits adopted in this proceeding be implemented on January 1st through SDG&E's consolidated
2 advice letter filing.

3 This concludes my prepared supplemental direct testimony.

1 **VI. STATEMENT OF QUALIFICATIONS**

2 My name is William G. Saxe. My business address is 8330 Century Park Court, San
3 Diego, California 92123. I am employed as Rates & Cost Studies Project Manager in the
4 Customer Pricing Department of SDG&E. I have worked for SDG&E since February 2001.
5 Prior to joining SDG&E, I was employed by Sempra Energy, the parent company of SDG&E,
6 from April 1999 through January 2001. In addition, I was employed by the Illinois Commerce
7 Commission (ICC) from September 1990 through April 1999.

8 I received a Bachelor of Science degree in Economics from the University of Wisconsin-
9 Madison in 1985. I received a Master of Business Administration degree, with a concentration
10 in Finance, from the University of Wisconsin-Madison in 1990.

11 I have previously testified before the CPUC on rate design, marginal cost and other
12 issues. In addition, I have previously submitted testimony before the FERC and the ICC.

ATTACHMENT A
ILLUSTRATIVE STAGE 1 RTP PILOT COMMODITY IMPORT RATES

| Customer Classes | <u>Residential</u> | <u>Small Commercial</u> | <u>M/L C&I</u> | <u>Agricultural</u> |
|---|--|-------------------------|--------------------|---------------------|
| CAISO Day-Ahead Hourly Price (\$/kWh) | same price for all customer classes that is updated daily, day-ahead | | | |
| Illustrative CPP Commodity Capacity Adder (\$/kWh) ¹ | \$0.85113 | \$1.53747 | \$2.12583 | \$1.44993 |
| Illustrative Total Base Commodity Rate (\$/kWh) ² | | | | |
| Commodity Base Rate (\$/kWh) | \$0.06491 | \$0.05688 | \$0.06574 | \$0.04983 |
| | <u>Under-/Over-Collections</u> | | | |
| Class Average Critical Peak Pricing (CPP) Under-/Over-Collection Rate | \$0.00011 | \$0.00102 | (\$0.00354) | \$0.00364 |
| Class Average Schedule DG-R (DG-R) Under-/Over-Collection Rate | NA | NA | (\$0.00011) | NA |
| Illustrative Total Commodity Base Rate (\$/kWh) | \$0.06502 | \$0.05791 | \$0.06209 | \$0.05347 |

Notes:

(1) The illustrative CPP Commodity Capacity Adders are based on SDG&E's current electric rates filed in SDG&E AL 4004-E, effective June 1, 2022.

(2) The illustrative Total Base Commodity Rates are based on SDG&E's current electric rates filed in SDG&E AL 4004-E, effective June 1, 2022.

ATTACHMENT B
ILLUSTRATIVE COMMODITY EXPORT COMPENSATION RATES

| Customer Classes ¹ | <u>Residential</u> | <u>Small Commercial</u> | <u>M/L C&I</u> | <u>Agricultural</u> |
|---|--|-------------------------|--------------------|---------------------|
| CAISO Day-Ahead Hourly Price Credit (\$/kWh) | same price for all customer classes that is updated daily, day-ahead | | | |
| Illustrative Export CPP Commodity Capacity Credit (\$/kWh) ² | (\$0.44368) | (\$0.84695) | (\$0.98163) | (\$0.89743) |

Notes:

- (1) SDG&E presents the illustrative commodity export compensation credits by customer class for both Stage 1 and Stage 2 of the export pilot. Stage 1 of the pilot is for customers on Schedule EV-HP, customers that will receive the commodity export compensation credits for the M/L C&I customer class.
- (2) The Illustrative Export CPP Commodity Capacity Credits are based on SDG&E's current electric rates filed in SDG&E AL 4004-E, effective June 1, 2022.

ATTACHMENT C
ILLUSTRATIVE TIME-DIFFERENTIATED \$/KWH TRANSMISSION ENERGY RATES

| | <u>Current 2022 Transmission Rates¹</u> | <u>Time-Differentiated 2022 Transmission Rates</u> | <u>Difference</u> |
|---|--|--|-------------------|
| Residential | | | |
| Flat \$/kWh Rate | \$0.08993 | | |
| TOU \$/kWh Rates | | | |
| <i>On-Peak</i> | \$0.08993 | \$0.10805 | \$0.01812 |
| <i>Off-Peak</i> | \$0.08993 | \$0.08094 | (\$0.00899) |
| <i>Super Off-Peak</i> | \$0.08993 | \$0.08094 | (\$0.00899) |
| Small Commercial | | | |
| Flat \$/kWh Rate | \$0.05712 | | |
| TOU \$/kWh Rates | | | |
| <i>On-Peak</i> | \$0.05712 | \$0.07629 | \$0.01917 |
| <i>Off-Peak</i> | \$0.05712 | \$0.05141 | (\$0.00571) |
| <i>Super Off-Peak</i> | \$0.05712 | \$0.05141 | (\$0.00571) |
| Medium/Large Commercial & Industrial (M/L C&I)² | | | |
| Flat \$/kWh Rate | \$0.05088 | | |
| TOU \$/kWh Rates | | | |
| <i>On-Peak</i> | \$0.05088 | \$0.06868 | \$0.01780 |
| <i>Off-Peak</i> | \$0.05088 | \$0.04579 | (\$0.00509) |
| <i>Super Off-Peak</i> | \$0.05088 | \$0.04579 | (\$0.00509) |
| Agricultural | | | |
| Flat \$/kWh Rate | \$0.03530 | | |
| TOU \$/kWh Rates | | | |
| <i>On-Peak</i> | \$0.03530 | \$0.05121 | \$0.01591 |
| <i>Off-Peak</i> | \$0.03530 | \$0.03177 | (\$0.00353) |
| <i>Super Off-Peak</i> | \$0.03530 | \$0.03177 | (\$0.00353) |

Note:

- (1) Current 2022 Transmission Rates are based on SDG&E's current electric 2022 transmission rates filed in SDG&E AL 3928-E/3928-E-A/3928-E-B, effective January 1, 2022.
- (2) Most SDG&E M/L C&I customers pay non-coincident demand and on-peak demand transmission charges. Schedules VGI, Public GIR, and EV-HP customers that are M/L C&I customers currently pay flat transmission energy charges. The illustrative time-differentiated \$/kWh energy charges shown for M/L C&I reflect illustrative transmission rates for VGI, Public GIR, and EV-HP customers.

**ATTACHMENT D
CURRENT AND PROPOSED ILLUSTRATIVE TOTAL RATES FOR RATE SCHEDULES ELIGIBLE FOR STAGE 1 RTP PILOT COMMODITY IMPORT RATES**

| | CURRENT RATES | | | | ILLUSTRATIVE PROPOSED RATES | | | | |
|--|-----------------------------|----------------------|-----------------------------|------------|-----------------------------|----------------------|-----------------------------|------------------------|------------------------|
| | TOTAL UDC RATE ¹ | WF-NBC & DWR-BC RATE | COMMODITY RATE ² | TOTAL RATE | TOTAL UDC RATE | WF-NBC & DWR-BC RATE | COMMODITY RATE ² | TOTAL RATE | |
| RESIDENTIAL CLASS | | | | | | | | | |
| Schedule TOU-DR1 | | | | | | | | | |
| | <u>Energy Charges</u> | | | | | | | | |
| Summer: On-Peak | \$/kWh | \$0.26467 | \$0.00309 | \$0.42232 | \$0.69008 | \$0.26467 | \$0.00309 | NA | \$0.26776 |
| Summer: Off-Peak | \$/kWh | \$0.26467 | \$0.00309 | \$0.19003 | \$0.45779 | \$0.26467 | \$0.00309 | NA | \$0.26776 |
| Summer: Super Off-Peak | \$/kWh | \$0.26467 | \$0.00309 | \$0.06802 | \$0.33578 | \$0.26467 | \$0.00309 | NA | \$0.26776 |
| Winter: On-Peak | \$/kWh | \$0.39848 | \$0.00309 | \$0.14268 | \$0.54425 | \$0.39848 | \$0.00309 | NA | \$0.40157 |
| Winter: Off-Peak | \$/kWh | \$0.39848 | \$0.00309 | \$0.08004 | \$0.48161 | \$0.39848 | \$0.00309 | NA | \$0.40157 |
| Winter: Super Off-Peak | \$/kWh | \$0.39848 | \$0.00309 | \$0.06187 | \$0.46344 | \$0.39848 | \$0.00309 | NA | \$0.40157 |
| Summer: Baseline Adjustment | \$/kWh | -\$0.10182 | NA | NA | -\$0.10182 | -\$0.10182 | NA | NA | -\$0.10182 |
| Summer: 101% to 130% Baseline Adjustment | \$/kWh | -\$0.10182 | NA | NA | -\$0.10182 | -\$0.10182 | NA | NA | -\$0.10182 |
| Winter: Baseline Adjustment | \$/kWh | -\$0.10182 | NA | NA | -\$0.10182 | -\$0.10182 | NA | NA | -\$0.10182 |
| Winter: 101% to 130% Baseline Adjustment | \$/kWh | -\$0.10182 | NA | NA | -\$0.10182 | -\$0.10182 | NA | NA | -\$0.10182 |
| Minimum Bill | Min \$/Day | \$0.35000 | NA | NA | \$0.35000 | \$0.35000 | NA | NA | \$0.35000 |
| Stage 1 Pilot Commodity Import Rates | | | | | | | | | |
| CAISO Day-Ahead Hourly Price | \$/kWh | NA | NA | NA | NA | NA | NA | Day-Ahead Hourly Price | Day-Ahead Hourly Price |
| RTP Import Commodity Capacity Adder | \$/kWh | NA | NA | NA | NA | NA | NA | \$0.85113 | \$0.85113 |
| Total Commodity Base Rate | \$/kWh | NA | NA | NA | NA | NA | NA | \$0.06502 | \$0.06502 |
| Schedule EV-TOL-5 | | | | | | | | | |
| Basic Service Fee | \$/Month | \$16.00 | NA | NA | \$16.00 | \$16.00 | NA | NA | \$16.00 |
| | <u>Energy Charges</u> | | | | | | | | |
| Summer: On-Peak | \$/kWh | \$0.24286 | \$0.00309 | \$0.39286 | \$0.63881 | \$0.24286 | \$0.00309 | NA | \$0.24595 |
| Summer: Off-Peak | \$/kWh | \$0.24286 | \$0.00309 | \$0.14441 | \$0.39056 | \$0.24286 | \$0.00309 | NA | \$0.24595 |
| Summer: Super Off-Peak | \$/kWh | \$0.03124 | \$0.00309 | \$0.06802 | \$0.10235 | \$0.03124 | \$0.00309 | NA | \$0.03433 |
| Winter: On-Peak | \$/kWh | \$0.24286 | \$0.00309 | \$0.16699 | \$0.41284 | \$0.24286 | \$0.00309 | NA | \$0.24595 |
| Winter: Off-Peak | \$/kWh | \$0.24286 | \$0.00309 | \$0.11975 | \$0.36570 | \$0.24286 | \$0.00309 | NA | \$0.24595 |
| Winter: Super Off-Peak | \$/kWh | \$0.03124 | \$0.00309 | \$0.06187 | \$0.09620 | \$0.03124 | \$0.00309 | NA | \$0.03433 |
| Stage 1 Pilot Commodity Import Rates | | | | | | | | | |
| CAISO Day-Ahead Hourly Price | \$/kWh | NA | NA | NA | NA | NA | NA | Day-Ahead Hourly Price | Day-Ahead Hourly Price |
| RTP Commodity Capacity Adder | \$/kWh | NA | NA | NA | NA | NA | NA | \$0.85113 | \$0.85113 |
| Total Commodity Base Rate | \$/kWh | NA | NA | NA | NA | NA | NA | \$0.06502 | \$0.06502 |

**ATTACHMENT D
CURRENT AND PROPOSED ILLUSTRATIVE TOTAL RATES FOR RATE SCHEDULES ELIGIBLE FOR STAGE 1 RTP PILOT COMMODITY IMPORT RATES**

| | CURRENT RATES | | | | ILLUSTRATIVE PROPOSED RATES | | | | |
|--------------------------------------|-----------------------------------|-------------------------|--------------------------------|------------|-----------------------------|-------------------------|--------------------------------|------------------------|------------------------|
| | TOTAL UDC RATE ¹ | WF-NBC & DWR-BC RATE | COMMODITY RATE ² | TOTAL RATE | TOTAL UDC RATE | WF-NBC & DWR-BC RATE | COMMODITY RATE ² | TOTAL RATE | |
| SMALL COMMERCIAL CLASS | | | | | | | | | |
| Schedule TOU-A | | | | | | | | | |
| <u>Basic Service Fee</u> | | | | | | | | | |
| Secondary | | | | | | | | | |
| 0-5 kW | \$/Month | \$10.70 | NA | NA | \$10.70 | NA | NA | \$10.70 | |
| 5-20 kW | \$/Month | \$17.12 | NA | NA | \$17.12 | NA | NA | \$17.12 | |
| 20-50 kW | \$/Month | \$32.10 | NA | NA | \$32.10 | NA | NA | \$32.10 | |
| >50 kW | \$/Month | \$80.25 | NA | NA | \$80.25 | NA | NA | \$80.25 | |
| Primary | | | | | | | | | |
| 0-5 kW | \$/Month | \$10.70 | NA | NA | \$10.70 | NA | NA | \$10.70 | |
| 5-20 kW | \$/Month | \$17.12 | NA | NA | \$17.12 | NA | NA | \$17.12 | |
| 20-50 kW | \$/Month | \$32.10 | NA | NA | \$32.10 | NA | NA | \$32.10 | |
| >50 kW | \$/Month | \$80.25 | NA | NA | \$80.25 | NA | NA | \$80.25 | |
| <u>Energy Charge</u> | | | | | | | | | |
| Summer: On-Peak | | | | | | | | | |
| Secondary | \$/Wh | \$0.19522 | \$0.00309 | \$0.25075 | \$0.44966 | \$0.19522 | \$0.00309 | NA | \$0.19831 |
| Primary | \$/Wh | \$0.19455 | \$0.00309 | \$0.24950 | \$0.44714 | \$0.19455 | \$0.00309 | NA | \$0.19764 |
| Summer: Off-Peak | | | | | | | | | |
| Secondary | \$/Wh | \$0.19522 | \$0.00309 | \$0.13781 | \$0.33612 | \$0.19522 | \$0.00309 | NA | \$0.19831 |
| Primary | \$/Wh | \$0.19455 | \$0.00309 | \$0.13712 | \$0.33456 | \$0.19455 | \$0.00309 | NA | \$0.19764 |
| Winter: On-Peak | | | | | | | | | |
| Secondary | \$/Wh | \$0.19522 | \$0.00309 | \$0.14718 | \$0.34549 | \$0.19522 | \$0.00309 | NA | \$0.19831 |
| Primary | \$/Wh | \$0.19455 | \$0.00309 | \$0.14648 | \$0.34412 | \$0.19455 | \$0.00309 | NA | \$0.19764 |
| Winter: Off-Peak | | | | | | | | | |
| Secondary | \$/Wh | \$0.19522 | \$0.00309 | \$0.07221 | \$0.27052 | \$0.19522 | \$0.00309 | NA | \$0.19831 |
| Primary | \$/Wh | \$0.19455 | \$0.00309 | \$0.07193 | \$0.26957 | \$0.19455 | \$0.00309 | NA | \$0.19764 |
| Stage 1 Pilot Commodity Import Rates | | | | | | | | | |
| CAISO Day-Ahead Hourly Price | \$/Wh | NA | NA | NA | NA | NA | NA | Day-Ahead Hourly Price | Day-Ahead Hourly Price |
| RTP Commodity Capacity Adder | \$/Wh | NA | NA | NA | NA | NA | NA | \$1.53747 | \$1.53747 |
| Total Commodity Base Rate | \$/Wh | NA | NA | NA | NA | NA | NA | \$0.05791 | \$0.05791 |

**ATTACHMENT D
CURRENT AND PROPOSED ILLUSTRATIVE TOTAL RATES FOR RATE SCHEDULES ELIGIBLE FOR STAGE 1 RTP PILOT COMMODITY IMPORT RATES**

| | CURRENT RATES | | | | ILLUSTRATIVE PROPOSED RATES | | | |
|---|-----------------------------|----------------------|-----------------------------|-------------|-----------------------------|----------------------|-----------------------------|------------------------|
| | TOTAL UDC RATE ¹ | WF-NBC & DWR-BC RATE | COMMODITY RATE ² | TOTAL RATE | TOTAL UDC RATE | WF-NBC & DWR-BC RATE | COMMODITY RATE ² | TOTAL RATE |
| MEDIUM/LARGE COMMERCIAL & INDUSTRIAL (M/L C&I) CLASS | | | | | | | | |
| Schedule AL-TOU | | | | | | | | |
| <u>Basic Service Fee</u> | | | | | | | | |
| Less than or equal to 500 kW | | | | | | | | |
| Secondary \$/Month | \$199.35 | NA | NA | \$199.35 | \$199.35 | NA | NA | \$199.35 |
| Primary \$/Month | \$53.75 | NA | NA | \$53.75 | \$53.75 | NA | NA | \$53.75 |
| Secondary Substation \$/Month | \$18,717.35 | NA | NA | \$18,717.35 | \$18,717.35 | NA | NA | \$18,717.35 |
| Primary Substation \$/Month | \$18,717.35 | NA | NA | \$18,717.35 | \$18,717.35 | NA | NA | \$18,717.35 |
| Transmission \$/Month | \$289.91 | NA | NA | \$289.91 | \$289.91 | NA | NA | \$289.91 |
| Greater than 500 kW | | | | | | | | |
| Secondary \$/Month | \$766.91 | NA | NA | \$766.91 | \$766.91 | NA | NA | \$766.91 |
| Primary \$/Month | \$63.95 | NA | NA | \$63.95 | \$63.95 | NA | NA | \$63.95 |
| Secondary Substation \$/Month | \$18,717.35 | NA | NA | \$18,717.35 | \$18,717.35 | NA | NA | \$18,717.35 |
| Primary Substation \$/Month | \$18,717.35 | NA | NA | \$18,717.35 | \$18,717.35 | NA | NA | \$18,717.35 |
| Transmission \$/Month | \$1,159.95 | NA | NA | \$1,159.95 | \$1,159.95 | NA | NA | \$1,159.95 |
| Greater than 12 MW | | | | | | | | |
| Secondary Substation \$/Month | \$31,585.50 | NA | NA | \$31,585.50 | \$31,585.50 | NA | NA | \$31,585.50 |
| Primary Substation \$/Month | \$31,644.17 | NA | NA | \$31,644.17 | \$31,644.17 | NA | NA | \$31,644.17 |
| Transmission Multiple Bus \$/Month | \$3,000.00 | NA | NA | \$3,000.00 | \$3,000.00 | NA | NA | \$3,000.00 |
| Distance Adjustment Fee OH - Sec. Sub. \$/Foot/Month | \$1.23 | NA | NA | \$1.23 | \$1.23 | NA | NA | \$1.23 |
| Distance Adjustment Fee UG - Sec. Sub. \$/Foot/Month | \$3.17 | NA | NA | \$3.17 | \$3.17 | NA | NA | \$3.17 |
| Distance Adjustment Fee OH - Pri. Sub. \$/Foot/Month | \$1.22 | NA | NA | \$1.22 | \$1.22 | NA | NA | \$1.22 |
| Distance Adjustment Fee UG - Pri. Sub. \$/Foot/Month | \$3.13 | NA | NA | \$3.13 | \$3.13 | NA | NA | \$3.13 |
| <u>Non-Calculation Demand</u> | | | | | | | | |
| Secondary \$/kW | \$31.32 | NA | NA | \$31.32 | \$31.32 | NA | NA | \$31.32 |
| Primary \$/kW | \$30.62 | NA | NA | \$30.62 | \$30.62 | NA | NA | \$30.62 |
| Secondary Substation \$/kW | \$19.75 | NA | NA | \$19.75 | \$19.75 | NA | NA | \$19.75 |
| Primary Substation \$/kW | \$19.12 | NA | NA | \$19.12 | \$19.12 | NA | NA | \$19.12 |
| Transmission \$/kW | \$19.05 | NA | NA | \$19.05 | \$19.05 | NA | NA | \$19.05 |
| <u>Maximum On-Peak Demand - Summer</u> | | | | | | | | |
| Secondary \$/kW | \$27.80 | NA | \$12.18 | \$39.98 | \$27.80 | NA | NA | \$27.80 |
| Primary \$/kW | \$27.54 | NA | \$12.12 | \$39.66 | \$27.54 | NA | NA | \$27.54 |
| Secondary Substation \$/kW | \$3.90 | NA | \$12.18 | \$16.08 | \$3.90 | NA | NA | \$3.90 |
| Primary Substation \$/kW | \$3.77 | NA | \$12.12 | \$15.89 | \$3.77 | NA | NA | \$3.77 |
| Transmission \$/kW | \$3.75 | NA | \$11.60 | \$15.35 | \$3.75 | NA | NA | \$3.75 |
| <u>Maximum On-Peak Demand - Winter</u> | | | | | | | | |
| Secondary \$/kW | \$28.74 | NA | NA | \$28.74 | \$28.74 | NA | NA | \$28.74 |
| Primary \$/kW | \$28.56 | NA | NA | \$28.56 | \$28.56 | NA | NA | \$28.56 |
| Secondary Substation \$/kW | \$0.82 | NA | NA | \$0.82 | \$0.82 | NA | NA | \$0.82 |
| Primary Substation \$/kW | \$0.79 | NA | NA | \$0.79 | \$0.79 | NA | NA | \$0.79 |
| Transmission \$/kW | \$0.79 | NA | NA | \$0.79 | \$0.79 | NA | NA | \$0.79 |
| <u>Energy Charges</u> | | | | | | | | |
| <u>Summer On-Peak Energy</u> | | | | | | | | |
| Secondary \$/kWh | \$0.00769 | \$0.00309 | \$0.17868 | \$0.18946 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Primary \$/kWh | \$0.00769 | \$0.00309 | \$0.17782 | \$0.18860 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Secondary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.17868 | \$0.18634 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.17782 | \$0.18548 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission \$/kWh | \$0.00457 | \$0.00309 | \$0.17021 | \$0.17787 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| <u>Summer Off-Peak Energy</u> | | | | | | | | |
| Secondary \$/kWh | \$0.00769 | \$0.00309 | \$0.10423 | \$0.11501 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Primary \$/kWh | \$0.00769 | \$0.00309 | \$0.10375 | \$0.11453 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Secondary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.10423 | \$0.11189 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.10375 | \$0.11141 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission \$/kWh | \$0.00457 | \$0.00309 | \$0.09933 | \$0.10699 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| <u>Summer Super Off-Peak Energy</u> | | | | | | | | |
| Secondary \$/kWh | \$0.00769 | \$0.00309 | \$0.09960 | \$0.11038 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Primary \$/kWh | \$0.00769 | \$0.00309 | \$0.09927 | \$0.11005 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Secondary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.09960 | \$0.10726 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.09927 | \$0.10693 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission \$/kWh | \$0.00457 | \$0.00309 | \$0.09526 | \$0.10292 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| <u>Winter On-Peak Energy</u> | | | | | | | | |
| Secondary \$/kWh | \$0.00769 | \$0.00309 | \$0.20915 | \$0.21993 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Primary \$/kWh | \$0.00769 | \$0.00309 | \$0.20820 | \$0.21898 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Secondary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.20915 | \$0.21681 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.20820 | \$0.21586 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission \$/kWh | \$0.00457 | \$0.00309 | \$0.19942 | \$0.20708 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| <u>Winter Off-Peak Energy</u> | | | | | | | | |
| Secondary \$/kWh | \$0.00769 | \$0.00309 | \$0.11723 | \$0.12801 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Primary \$/kWh | \$0.00769 | \$0.00309 | \$0.11674 | \$0.12752 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Secondary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.11723 | \$0.12489 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.11674 | \$0.12440 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission \$/kWh | \$0.00457 | \$0.00309 | \$0.11195 | \$0.11961 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| <u>Winter Super Off-Peak Energy</u> | | | | | | | | |
| Secondary \$/kWh | \$0.00769 | \$0.00309 | \$0.09058 | \$0.10136 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Primary \$/kWh | \$0.00769 | \$0.00309 | \$0.09028 | \$0.10106 | \$0.00769 | \$0.00309 | NA | \$0.01078 |
| Secondary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.09058 | \$0.09824 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation \$/kWh | \$0.00457 | \$0.00309 | \$0.09028 | \$0.09794 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission \$/kWh | \$0.00457 | \$0.00309 | \$0.08664 | \$0.09430 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| CAISO Day-Ahead Hourly Price \$/kWh | NA | NA | NA | NA | NA | NA | Day-Ahead Hourly Price | Day-Ahead Hourly Price |
| RTP Commodity Capacity Adder \$/kWh | NA | NA | NA | NA | NA | NA | \$2.12583 | \$2.12583 |
| Total Commodity Base Rate \$/kWh | NA | NA | NA | NA | NA | NA | \$0.06209 | \$0.06209 |

**ATTACHMENT D
CURRENT AND PROPOSED ILLUSTRATIVE TOTAL RATES FOR RATE SCHEDULES ELIGIBLE FOR STAGE 1 RTP PILOT COMMODITY IMPORT RATES**

Schedule A6-TOU

| | CURRENT RATES | | | | ILLUSTRATIVE PROPOSED RATES | | | | |
|---|-----------------------------|----------------------|-----------------------------|------------|-----------------------------|----------------------|-----------------------------|------------------------|------------------------|
| | TOTAL UDC RATE ¹ | WF-NBC & DWR-BC RATE | COMMODITY RATE ² | TOTAL RATE | TOTAL UDC RATE | WF-NBC & DWR-BC RATE | COMMODITY RATE ² | TOTAL RATE | |
| Basic Service Fee | | | | | | | | | |
| ---S&A--- | | | | | | | | | |
| Primary | \$/Month | \$63.95 | NA | NA | \$63.95 | \$63.95 | NA | NA | \$63.95 |
| Primary Substation | \$/Month | \$18,717.35 | NA | NA | \$18,717.35 | \$18,717.35 | NA | NA | \$18,717.35 |
| Transmission | \$/Month | \$1,670.55 | NA | NA | \$1,670.55 | \$1,670.55 | NA | NA | \$1,670.55 |
| 12 MW Primary Substation | \$/Month | \$31,644.17 | NA | NA | \$31,644.17 | \$31,644.17 | NA | NA | \$31,644.17 |
| Distance Adjustment Fee OH - Pk. Sub. 5Foot/Month | | \$1.22 | NA | NA | \$1.22 | \$1.22 | NA | NA | \$1.22 |
| Distance Adjustment Fee UG - Pk. Sub. 5Foot/Month | | \$3.13 | NA | NA | \$3.13 | \$3.13 | NA | NA | \$3.13 |
| Non-Contingent Demand | | | | | | | | | |
| Primary | \$/KW | \$31.75 | NA | NA | \$31.75 | \$31.75 | NA | NA | \$31.75 |
| Primary Substation | \$/KW | \$19.12 | NA | NA | \$19.12 | \$19.12 | NA | NA | \$19.12 |
| Transmission | \$/KW | \$19.05 | NA | NA | \$19.05 | \$19.05 | NA | NA | \$19.05 |
| Maximum On-Peak Demand - Summer | | | | | | | | | |
| Primary | \$/KW | \$28.20 | NA | \$12.12 | \$40.32 | \$28.20 | NA | NA | \$28.20 |
| Primary Substation | \$/KW | \$4.38 | NA | \$12.12 | \$16.50 | \$4.38 | NA | NA | \$4.38 |
| Transmission | \$/KW | \$4.35 | NA | \$11.60 | \$15.95 | \$4.35 | NA | NA | \$4.35 |
| Maximum On-Peak Demand - Winter | | | | | | | | | |
| Primary | \$/KW | \$28.65 | NA | NA | \$28.65 | \$28.65 | NA | NA | \$28.65 |
| Primary Substation | \$/KW | \$0.83 | NA | NA | \$0.83 | \$0.83 | NA | NA | \$0.83 |
| Transmission | \$/KW | \$0.83 | NA | NA | \$0.83 | \$0.83 | NA | NA | \$0.83 |
| Energy Charges | | | | | | | | | |
| Summer On-Peak Energy | | | | | | | | | |
| Primary | \$/kWh | \$0.00457 | \$0.00309 | \$0.17782 | \$0.18548 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation | \$/kWh | \$0.00457 | \$0.00309 | \$0.17782 | \$0.18548 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission | \$/kWh | \$0.00457 | \$0.00309 | \$0.17021 | \$0.17787 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Summer Off-Peak Energy | | | | | | | | | |
| Primary | \$/kWh | \$0.00457 | \$0.00309 | \$0.10375 | \$0.11141 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation | \$/kWh | \$0.00457 | \$0.00309 | \$0.10375 | \$0.11141 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission | \$/kWh | \$0.00457 | \$0.00309 | \$0.09933 | \$0.10699 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Summer Super Off-Peak Energy | | | | | | | | | |
| Primary | \$/kWh | \$0.00457 | \$0.00309 | \$0.09927 | \$0.10693 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation | \$/kWh | \$0.00457 | \$0.00309 | \$0.09927 | \$0.10693 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission | \$/kWh | \$0.00457 | \$0.00309 | \$0.09526 | \$0.10292 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Winter On-Peak Energy | | | | | | | | | |
| Primary | \$/kWh | \$0.00457 | \$0.00309 | \$0.20820 | \$0.21586 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation | \$/kWh | \$0.00457 | \$0.00309 | \$0.20820 | \$0.21586 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission | \$/kWh | \$0.00457 | \$0.00309 | \$0.19942 | \$0.20708 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Winter Off-Peak Energy | | | | | | | | | |
| Primary | \$/kWh | \$0.00457 | \$0.00309 | \$0.11674 | \$0.12440 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation | \$/kWh | \$0.00457 | \$0.00309 | \$0.11674 | \$0.12440 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission | \$/kWh | \$0.00457 | \$0.00309 | \$0.11195 | \$0.11961 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Winter Super Off-Peak Energy | | | | | | | | | |
| Primary | \$/kWh | \$0.00457 | \$0.00309 | \$0.09028 | \$0.09794 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Primary Substation | \$/kWh | \$0.00457 | \$0.00309 | \$0.09028 | \$0.09794 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| Transmission | \$/kWh | \$0.00457 | \$0.00309 | \$0.08664 | \$0.09430 | \$0.00457 | \$0.00309 | NA | \$0.00766 |
| CAISO Day-Ahead Hourly Price | | | | | | | | | |
| CAISO Day-Ahead Hourly Price | \$/kWh | NA | NA | NA | NA | NA | NA | Day-Ahead Hourly Price | Day-Ahead Hourly Price |
| RTP Commodity Capacity Adder | \$/kWh | NA | NA | NA | NA | NA | NA | \$2.12583 | \$2.12583 |
| Total Commodity Base Rate | \$/kWh | NA | NA | NA | NA | NA | NA | \$0.06209 | \$0.06209 |

Stage 1 Pilot Commodity Import Rates

**ATTACHMENT D
CURRENT AND PROPOSED ILLUSTRATIVE TOTAL RATES FOR RATE SCHEDULES ELIGIBLE FOR STAGE 1 RTP PILOT COMMODITY IMPORT RATES**

| | CURRENT RATES | | | | ILLUSTRATIVE PROPOSED RATES | | | | |
|--|-----------------------------|----------------------|-----------------------------|------------|-----------------------------|----------------------|-----------------------------|------------------------|------------------------|
| | TOTAL UDC RATE ¹ | WF-NBC & DWR-BC RATE | COMMODITY RATE ² | TOTAL RATE | TOTAL UDC RATE | WF-NBC & DWR-BC RATE | COMMODITY RATE ² | TOTAL RATE | |
| AGRICULTURAL CLASS | | | | | | | | | |
| Schedule PA-T-1 | | | | | | | | | |
| <u>Basic Service Fee</u> | | | | | | | | | |
| Secondary | \$/Month | \$12.87 | NA | NA | \$12.87 | NA | NA | \$12.87 | |
| Primary | \$/Month | \$12.87 | NA | NA | \$12.87 | NA | NA | \$12.87 | |
| Transmission | \$/Month | \$12.87 | NA | NA | \$12.87 | NA | NA | \$12.87 | |
| <u>Non-Coincident Demand</u> | | | | | | | | | |
| Secondary | \$/kW | \$8.49 | NA | NA | \$8.49 | NA | NA | \$8.49 | |
| Primary | \$/kW | \$8.19 | NA | NA | \$8.19 | NA | NA | \$8.19 | |
| Transmission | \$/kW | \$8.15 | NA | NA | \$8.15 | NA | NA | \$8.15 | |
| <u>Time-of-Day (TOD) Demand</u> | | | | | | | | | |
| Secondary | \$/kW | \$22.48 | NA | NA | \$22.48 | NA | NA | \$22.48 | |
| Primary | \$/kW | \$22.37 | NA | NA | \$22.37 | NA | NA | \$22.37 | |
| Transmission | \$/kW | \$0.00 | NA | NA | \$0.00 | NA | NA | \$0.00 | |
| <u>Maximum On-Peak Demand - Summer</u> | | | | | | | | | |
| Secondary | \$/kW | \$0.00 | NA | \$6.17 | \$6.17 | NA | NA | \$0.00 | |
| Primary | \$/kW | \$0.00 | NA | \$6.14 | \$6.14 | NA | NA | \$0.00 | |
| Transmission | \$/kW | \$0.00 | NA | \$5.88 | \$5.88 | NA | NA | \$0.00 | |
| <u>Maximum On-Peak Demand - Winter</u> | | | | | | | | | |
| Secondary | \$/kW | \$0.00 | NA | NA | \$0.00 | NA | NA | \$0.00 | |
| Primary | \$/kW | \$0.00 | NA | NA | \$0.00 | NA | NA | \$0.00 | |
| Transmission | \$/kW | \$0.00 | NA | NA | \$0.00 | NA | NA | \$0.00 | |
| <u>Energy Charges</u> | | | | | | | | | |
| <u>Summer: On-Peak Energy</u> | | | | | | | | | |
| Secondary | \$/kWh | \$0.0541 | \$0.00309 | \$0.14961 | \$0.15811 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Primary | \$/kWh | \$0.0541 | \$0.00309 | \$0.14889 | \$0.15739 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Transmission | \$/kWh | \$0.0541 | \$0.00309 | \$0.14249 | \$0.15099 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| <u>Summer: Off-Peak Energy</u> | | | | | | | | | |
| Secondary | \$/kWh | \$0.0541 | \$0.00309 | \$0.09291 | \$0.10141 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Primary | \$/kWh | \$0.0541 | \$0.00309 | \$0.09248 | \$0.10098 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Transmission | \$/kWh | \$0.0541 | \$0.00309 | \$0.08854 | \$0.09704 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| <u>Summer: Super Off-Peak Energy</u> | | | | | | | | | |
| Secondary | \$/kWh | \$0.0541 | \$0.00309 | \$0.07453 | \$0.08303 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Primary | \$/kWh | \$0.0541 | \$0.00309 | \$0.07427 | \$0.08277 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Transmission | \$/kWh | \$0.0541 | \$0.00309 | \$0.07128 | \$0.07978 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| <u>Winter: On-Peak Energy</u> | | | | | | | | | |
| Secondary | \$/kWh | \$0.0541 | \$0.00309 | \$0.15644 | \$0.16494 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Primary | \$/kWh | \$0.0541 | \$0.00309 | \$0.15572 | \$0.16422 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Transmission | \$/kWh | \$0.0541 | \$0.00309 | \$0.14916 | \$0.15766 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| <u>Winter: Off-Peak Energy</u> | | | | | | | | | |
| Secondary | \$/kWh | \$0.0541 | \$0.00309 | \$0.08771 | \$0.09621 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Primary | \$/kWh | \$0.0541 | \$0.00309 | \$0.08735 | \$0.09585 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Transmission | \$/kWh | \$0.0541 | \$0.00309 | \$0.08376 | \$0.09226 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| <u>Winter: Super Off-Peak Energy</u> | | | | | | | | | |
| Secondary | \$/kWh | \$0.0541 | \$0.00309 | \$0.09777 | \$0.07627 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Primary | \$/kWh | \$0.0541 | \$0.00309 | \$0.08755 | \$0.07605 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Transmission | \$/kWh | \$0.0541 | \$0.00309 | \$0.06483 | \$0.07333 | \$0.0541 | \$0.00309 | NA | \$0.00850 |
| Stage 1 Pilot Commodity Import Rates | | | | | | | | | |
| CAISO Day-Ahead Hourly Price | \$/kWh | NA | NA | NA | NA | NA | NA | Day-Ahead Hourly Price | Day-Ahead Hourly Price |
| RTP Commodity Capacity Adder | \$/kWh | NA | NA | NA | NA | NA | NA | \$1.44993 | \$1.44993 |
| Total Commodity Base Rate | \$/kWh | NA | NA | NA | NA | NA | NA | \$0.05347 | \$0.05347 |
| SCHEDULE TOU-PA | | | | | | | | | |
| <u>Basic Service Fee</u> | | | | | | | | | |
| <u>≤ 20 kW</u> | | | | | | | | | |
| Secondary | \$/Month | \$23.41 | NA | NA | \$23.41 | NA | NA | \$23.41 | |
| Primary | \$/Month | \$23.41 | NA | NA | \$23.41 | NA | NA | \$23.41 | |
| <u>Energy Charges</u> | | | | | | | | | |
| <u>Summer: On-Peak Energy</u> | | | | | | | | | |
| Secondary | \$/kWh | \$0.0959 | \$0.00309 | 0.24924 | \$0.35192 | \$0.0959 | \$0.00309 | NA | \$0.10238 |
| Primary | \$/kWh | \$0.0929 | \$0.00309 | 0.24799 | \$0.35037 | \$0.0929 | \$0.00309 | NA | \$0.10238 |
| <u>Summer: Off-Peak Energy</u> | | | | | | | | | |
| Secondary | \$/kWh | \$0.0959 | \$0.00309 | 0.13769 | \$0.24037 | \$0.0959 | \$0.00309 | NA | \$0.10238 |
| Primary | \$/kWh | \$0.0929 | \$0.00309 | 0.13701 | \$0.23939 | \$0.0929 | \$0.00309 | NA | \$0.10238 |
| <u>Winter: On-Peak Energy</u> | | | | | | | | | |
| Secondary | \$/kWh | \$0.0959 | \$0.00309 | 0.12932 | \$0.23200 | \$0.0959 | \$0.00309 | NA | \$0.10238 |
| Primary | \$/kWh | \$0.0929 | \$0.00309 | 0.12871 | \$0.23109 | \$0.0929 | \$0.00309 | NA | \$0.10238 |
| <u>Winter: Off-Peak Energy</u> | | | | | | | | | |
| Secondary | \$/kWh | \$0.0959 | \$0.00309 | 0.06301 | \$0.16569 | \$0.0959 | \$0.00309 | NA | \$0.10238 |
| Primary | \$/kWh | \$0.0929 | \$0.00309 | 0.06278 | \$0.16516 | \$0.0929 | \$0.00309 | NA | \$0.10238 |
| Stage 1 Pilot Commodity Import Rates | | | | | | | | | |
| CAISO Day-Ahead Hourly Price | \$/kWh | NA | NA | NA | NA | NA | NA | Day-Ahead Hourly Price | Day-Ahead Hourly Price |
| RTP Commodity Capacity Adder | \$/kWh | NA | NA | NA | NA | NA | NA | \$1.44993 | \$1.44993 |
| Total Commodity Base Rate | \$/kWh | NA | NA | NA | NA | NA | NA | \$0.05347 | \$0.05347 |

Note:
 (1) The Current UDC Total rate shown reflects the sum of transmission, distribution, public purpose program (PPP), nuclear decommissioning, ongoing competition transition (CTC), local generation charge (LGC), reliability services (RS), and total rate adjustment component (TRAC) rates, effective June 1, 2022 per SDG&E Advice Letter (AL) 4004-E.
 (1) The Current Commodity Rates shown are the Schedule EECC, Electric Energy Commodity Cost, rates, effective June 1, 2022 per SDG&E AL 4004-E.
 (2) The Illustrative Proposed Commodity Rates shown are the illustrative Stage 1 RTP Pilot rates, based on SDG&E's current electric rates effective June 1, 2022 per SDG&E AL 4004-E.