



ALCANTAR & KAHL, LLP

Via e-mail

April 19, 2017

Jennifer Wright
Regulatory Case Manager
San Diego Gas & Electric Company
8330 Century Park Court, CP 32
San Diego, CA 92123

Re: Application 17-01-020

Dear Ms. Wright:

Enclosed is Data Request No. 1 of Clean Energy Fuels Corp. in the above-captioned proceeding. The data responses should be provided by May 3, 2017 or as soon as they are available to:

Evelyn Kahl
Katy Morsony
Alcantar & Kahl, LLP
345 California Street
Suite 2450
San Francisco, CA 94104
Phone 415.421.4143
Fax 415.989.1263
ek@a-klaw.com
klr@a-klaw.com

Thank you for your assistance in this matter. Please call me if you have questions.

Very truly yours,

A handwritten signature in black ink that reads 'Evelyn Kahl'.

Evelyn Kahl

Counsel to Clean Energy Fuels Corp.

SAN FRANCISCO OFFICE
345 California Street, Suite 2450 | San Francisco, CA 94104
415-421-4143 | Fax 415-989-1263 | www.a-klaw.com

PORTLAND OFFICE
121 SW Salmon Street, Suite 1100 | Portland, OR 97204
503-402-9900 | Fax 503-402-8882 | www.a-klaw.com



Question 01-1

Please provide all working papers supporting the testimony including all reports relied on by the Utility while developing the testimony. To the extent that these reports are publicly accessible please provide a link to the report. For each report relied on, please identify the date of publication and whether it was based on information specific to the utility territory.

Question 01-2

Identify by vehicle weight class the vehicles SDG&E considers to be Medium Duty Vehicles.

- a. For each weight class, identify the typical operating characteristics of vehicles in each class, including vocation/use, daily range in miles, time of day refueling typically occurs, and refueling needs.
- b. For each weight class, explain the extent to which the vehicles are used in interstate transportation.

Question 01-3

Identify by vehicle weight class the vehicles SDG&E considers to be Heavy Duty Vehicles.

- a. For each weight class, identify the typical operating characteristics of vehicles in each class, including vocation/use, daily range in miles, time of day refueling typically occurs, and refueling needs.
- b. For each weight class, explain the extent to which the vehicles are used in interstate transportation.

Question 01-4

- a. Please specify all vehicle fuels that are substitutable for electricity as a vehicle fuel for Medium Duty vehicles. Specify whether the fuels vary by vehicle weight class within the Medium Duty market segment.
- b. Did SDG&E commission or undertake a market study defining the scope of the competitive market for electricity as a vehicle fuel in the MD vehicle segment in support of the application?
- c. If yes, please provide the study.



Question 01-5

- a. Please specify all vehicle fuels that are substitutable for electricity as a vehicle fuel for Heavy Duty vehicles. Specify whether the fuels vary by vehicle weight class within the Heavy Duty market segment.
- b. Did SDG&E commission or undertake a market study defining the scope of the competitive market for electricity as a vehicle fuel in the HD vehicle segment in support of the application?
- c. If the answer to Question 01-5(b) above is yes, please provide the study.

Question 01-6

- a. Please identify any third-party businesses currently offering EV infrastructure in the SDG&E service territory.
- b. For each party identified above, please specify the nature of infrastructure provided.

Question 01-7

Page MMS-10, line 10-12, indicates that SDG&E does not propose a standard review program for the MD and HD markets at this time. Instead, in Note 14, Mr. Schneider notes the intention to “pursue projects as technologies for these sectors become feasible for the region.”

- a. Please state the basis for the conclusion that technologies in these sectors are not feasible for the SDG&E service territory and provide all workpapers, studies or other documents supporting this conclusion.
- b. What characteristics make a technology “feasible” and appropriate for support?
- c. Identify the factors that may make a technology feasible in one region and infeasible in another.
- d. Has SDG&E identified what is required for a technology to be considered feasible for its region?

Question 01-8

Identify all policy goals underlying Transportation Electrification (TE) considered by SDG&E in developing its Priority Review and Standard Review programs.



- a. Are California climate goals limited to the reduction of GHG emissions?
- b. Do California climate goals include reduction in NOx levels?
- c. Identify other vehicle fuel technologies available to serve the California goals of GHG and NOx reductions.
- d. Is it possible that increased EV load will require the Utility to procure additional generation capacity?
- e. Will all additional generation capacity procured to serve the increased load be emissions free?

Question 01-9

Please specify the carbon intensity (MT/MWh) and average NOx emissions of SDG&E’s system generation in 2016 for the following periods:

Hours	Summer		Winter	
	GHG	NOx	GHG	NOx
4 pm to 9 pm				
6 am to 4 pm, 9 pm to 12 am				
12 am to 6 am				

Question 01-10

- a. Are there additional Light Duty Priority Review or Standard Review Programs SDG&E considered but did not propose?
- b. If so, please describe any such programs and the reason why SDG&E elected not to advance the program.

Question 01-11

- a. Are the capital and operating costs of the charging infrastructure to be borne by the users of the charging facility?
- b. If no, who will bear the capital and operating costs of the charging infrastructure?



- c. Who will bear the cost of grid upgrades or other system reinforcements for the additional load resulting from increased transportation electrification?