1. Please provide a copy of any responses to data requests that SDG&E has provided to any other party in this proceeding (A.18-01-012). This is an ongoing request.

**SDG&E Response:**

Responses to previous data requests can be found at the following webpage: <https://www.sdge.com/regulatory-filing/23261/application-san-diego-gas-electric-company-u-902-e-approval-senate-bill-350>.

All associated work papers have been transmitted via FTP.

1. Chapter 2 Testimony, page HJR-17, line 17 states: “The Program will target DACs for EVSE deployment.”

a. How does SDG&E intend to target DACs for EVSE deployment? Please describe all measures that SDG&E intends to put in place to meet this target.

b. Please describe all strategies the Company has considered for targeting DACs for EVSE deployment, and explain how the Company chose the strategies it intends to implement from among the strategies it considered.

**SDG&E Response:**

a. SDG&E intends to target DACs through targeted marketing and education and working with internal groups such as regional public affairs and account executives. SDG&E has many relationships with customers in our territory and community groups. Those relationships will be leveraged to seek participants who are located in DACs.

b. Please see response to 2.a. In addition to the strategies above, SDG&E will seek additional opportunities to educate and market to participants in DACs.

1. Chapter 2 Testimony, page HJR-17, lines 17-18 states: “SDG&E’s goal is to deploy 40% of installations to support DACs.”
   1. State the basis for setting this goal at 40%. Please provide all data, workpapers, studies, analysis, and other documents that SDG&E relied on in developing its 40% goal.
   2. Is the 40% goal in SDG&E’s proposal a voluntary goal? Under SDG&E’s proposal, what are the consequences to SDG&E of spending the fully approved program budget outside of DACs?

**SDG&E Response:**

a. The decision to set a goal of 40% was to place an emphasis on supporting DACs. Formal workpapers or studies were not created or utilized in setting the target.

b. Yes, the goal was voluntarily set. SDG&E has not set a consequence for not reaching the 40% target.

1. Chapter 2 Testimony, page HJR-8, lines 12-13 states: “As part of the Program, up to 225 EVSEs will be available to support electric forklifts and TRUs. The forklift and TRU allotment is a cap, not a dedicated carve-out.”
   1. State the basis for capping the allotment to forklifts and TRUs.
   2. State the basis for setting the cap at 225.

**SDG&E Response:**

a. There is value in supporting all vehicles which emit local pollution. Therefore, a decision was made to support forklifts and TRUs. A cap was set in order to ensure that the program primarily focused on Class 2 – Class 8 vehicles.

b. Please see response to 4.a.

1. In response to Question 4 in TURN-SDG&E-DR-01, SDG&E provided its estimate of the EVSE counts in the MD/HD EV program, broken down by vehicle class.
   1. State the basis of these estimates. Please provide all data, workpapers, studies, analysis, and other documents that SDG&E relied on in developing the estimated EVSE update by vehicle class.

**SDG&E Response:**

Formal spreadsheets and workpapers were not used to calculate these assumptions. Vehicle classes were weighted based on a number of factors. Relatively mature vehicle classes such as delivery trucks and transit buses were weighted more heavily because it was assumed that those vehicles would be adopted sooner. Transit buses and school buses are also considered “beachheads” which have the ability to accelerate adoption of HD EVs.

Weighting different segments is similar to the approach taken in the CPUC’s May 31, 2018 decision on SCE’s and PG&E’s medium-duty / heavy-duty applications (Decision 18-05-040), where they chose to weigh the transit bus, school bus and heavy-duty vehicle sectors higher.

1. Has SDG&E considered targeting owners of any of the following types of vehicle and equipment in its MD/HD EV Program through tailored education, outreach or marketing, or through any other aspect of program implementation? If yes, please describe the strategies SDG&E has considered to assist or encourage participation in the program by owners of any of the following categories of vehicles, and identify which of those strategies SDG&E intends to implement:
   1. Transit buses and other public transit vehicles
   2. School buses
   3. Railyard equipment and vehicles that travel to and from rail facilities
   4. Warehouse equipment and vehicles that travel to and from warehouse facilities
   5. Port equipment and vehicles that travel to and from port facilities
   6. Airport equipment and vehicles that travel to and from airport facilities
   7. Vehicles used in cross-border goods movement

**SDG&E Response:**

a. Yes. Targeted marketing and education will be utilized to target these vehicles. Internal groups such as regional public affairs and account executives will also be utilized. SDG&E has many relationships with customers in our territory and community groups. Those relationships will be leveraged to seek participation in the MD/HD program.

b. Please see response to 6.a.

c. Some railyard equipment and vehicles that travel to and from rail facilities will be targeted such as on-road Class 2 – 8 vehicles. At this time, SDG&E has not specifically targeted rail related facilities or locomotives.

d. Please see response to 6.a.

e. Please see response to 6.a.

f. Please see response to 6.a.

g. Please see response to 6.a.

1. Chapter 1 Testimony, page LPB-11, lines 10-13 states: “The Program will have a positive impact on local air quality . . . especially [] when diesel vehicles are replaced with advanced clean vehicles.”
   1. What portion of EVs supported by the Program does SDG&E estimate will replace diesel vehicles? Please provide all data, analysis and other documents supporting your estimate.

**SDG&E Response:**

Program uptake will be customer driven. It is difficult to predict the ratio of gas/diesel/CNG vehicles that will be replaced with zero-emission electric vehicles.

1. Chapter 1 Testimony, page LPB-11, lines 14-17 states: “Air pollution impacts all ratepayers, however low-income communities, such as a DACs, are more likely to be located near ports, rail yards, warehouses, and busy roads, where they suffer disproportionally from the consequences of polluted air.”
   1. Approximately what portion of EVs supported by the Program does SDG&E estimate will operate predominately near (1) ports, (2) rail yards, (3) warehouses, and (4) busy roads? Please provide all data, analysis and other documents supporting your estimate.
   2. Approximately what portion of traffic related to (1) ports, (2) rail yards, (3) warehouses, and (4) busy roads in SDG&E’s territory is in DACs? Please provide all data, analysis and other documents supporting your estimate.

**SDG&E Response:**

a. Program uptake will be customer driven. It is difficult to predict what portion will be near ports, railroads, warehouses or busy roads. However, targeting DACs will help drive deployment towards those areas.

b. SDG&E does not have this information.

1. Chapter 1 Testimony, page LPB-10, lines 4-5 states: “The MD/HD EV Charging Infrastructure Program is a multi-year program that will support approximately 3,100 vehicles.”
   1. State the basis for proposing a program that will support approximately 3,100 vehicles. Please provide all data, workpapers, studies, analysis, and other documents supporting SDG&E’s decision to propose a MD/HD program of this scale.

**SDG&E Response:**

3,100 vehicles amount to approximately 3% of the MD and HD vehicle population in SDG&E’s service territory. Adoption curves show that the first 2.5% of technology adopters are “innovators.” They are followed by the next 13.5%, known as “early adopters.” SDG&E’s program size of 3% helps move the San Diego region market out of the innovators group into the early adopters group.

1. Chapter 1 Testimony, page LPB-12, lines 7-8 states: “Electric Transit Bus and Electric School Bus Deployment Will Benefit Disadvantaged Communities.”
   1. How many electric transit buses does SDG&E expect to deploy through its MD/HD EV Program? How many of these buses does SDG&E expect to serve DACs? Please provide all data, workpapers, studies, analysis, and other documents supporting your estimates.
   2. How many electric school buses does SDG&E expect to deploy through its MD/HD EV Program? How many of these buses does SDG&E expect to serve DACs? Please provide all data, workpapers, studies, analysis, and other documents supporting your estimates.
   3. How many transit buses operate in SDG&E’s service territory? How many of these buses serve DACs? What portion of transit buses operating in SDG&E’s service territory serve DACs?
   4. How many school buses operate in SDG&E’s service territory? How many of these buses serve DACs? What portion of school buses operating in SDG&E’s service territory serve DACs?
   5. Which transit agencies and/or school districts have communicated an interest to SDG&E about participating in a medium- and heavy-duty EV charging infrastructure program or sent inquiries to SDG&E related to charging infrastructure for electric buses?
   6. Which transit agencies and/or school districts has SDG&E directly contacted with information or inquiries regarding medium- and heavy-duty EV charging infrastructure.

**SDG&E Response:**

a. The program cost estimate assumed an uptake of 450 vehicles in Class 7-8. It is expected that a large portion could potentially be electric transit buses due to the state of the technology and California efforts to transition to zero-emission buses. It is unknown how many of the buses will be housed in or travel through a DAC although the overall program target is 40% DACs.

b. The program cost estimate assumed an uptake of 450 vehicles in Class 7-8. It is expected that a portion could potentially be electric school buses. It is expected that the uptake in electric school buses will lag behind transit due to the limited budget of school districts. It is unknown how many of the buses will be housed in or travel through a DAC although the overall program target is 40% DACs.

c. According to MTS’s April 2015 fact sheet (<https://www.sdmts.com/sites/default/files/attachments/BusOp_FactSheet.pdf>), MTS operates approximately 800 buses (includes paratransit buses). According to NCTD’s 2017 fact sheet(<http://www.gonctd.com/wp-content/uploads/2017/08/NCTD-Fact-Sheets-Updated-2017-Final.pdf>), NCTD operates approximately 160 buses. SDG&E does not know how many of the buses and routes serve DACs on a given day.

d. SDG&E does not have a comprehensive count of the total number of school buses that operate in SDG&E’s service territory.

e. The two transit agencies in SDG&E’s service territory have requested assistance from SDG&E to support their transition to electric buses. In addition, SDG&E has had discussions with other entities that utilize transit size buses including universities, the airport and others. SDG&E has engaged dozens of school districts through the K-12 Collaborative, which is a standing meeting that brings together school districts in the territory. Numerous schools have expressed interest in electric school buses.

f. Please see response 10.e.

1. Please confirm that SDG&E provides electrical service to military facilities within its service territory, including Naval Base Coronado, Naval Air Station North Island, and Marine Corps Air Station Miramar. Please identify each such military facilities that SDG&E serves. Please confirm that SDG&E’s military customers are eligible to participate in the Company’s proposed MD/HD EV Program.

**SDG&E Response:**

Yes, SDG&E provides electric service to military facilities within its service territory including Naval Base Coronado, Naval Air Station North Island and Marine Corps Air Station Miramar in addition to Marine Corps Base Camp Pendleton, Naval Base Point Loma, Naval Base San Diego, Marine Corps Recruit Depot, etc. Military customers are eligible to participate in the MD/HD program.