



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

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Expedited Application of San Diego Gas &
Electric Company (U 902 E) Under the Energy
Resource Recovery Account Trigger Mechanism.

Application 20-12-007
(Filed December 11, 2020)

**SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902-E) REPORT ON MEET AND
CONFER EFFORTS IN ADVANCE OF PREHEARING CONFERENCE**

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January 12, 2021

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Pursuant to the December 28, 2020 *E-mail Ruling Setting Telephonic Prehearing Conference and Directing Parties to Meet and Confer* issued by Administrative Law Judge (“ALJ”) Peter Wercinski in the above-captioned proceeding (“Ruling”), San Diego Gas & Electric Company (“SDG&E”) hereby submits this report regarding the parties’ meet and confer efforts in advance of the prehearing conference (“PHC”).

I. THE JANUARY 8TH MEET AND CONFER

Per the ALJ’s Ruling, parties and any entities that intend to request party status were “directed to meet and confer and, to the extent possible, resolve conflicts regarding a proceeding schedule, issues in scope, and other procedural matters before the PHC.” In addition, the Ruling directed SDG&E to coordinate the meet and confer process and file and serve a report regarding the results of the meet and confer process by January 12, 2021.

After contacting counsel for the various parties regarding their respective availability and providing notice to the A.20-04-014 and A.20-12-007 service lists, SDG&E scheduled a telephonic meet and confer conference for January 8, 2021. Counsel and representatives for SDG&E, the Public Advocates Office (“Cal Advocates”), San Diego Community Power, Clean Energy Alliance (collectively the “CCA Parties”), the Alliance for Retail Energy Markets and the Direct Customer Coalition (collectively “ARem/DACC”) participated in the meet and confer. The parties were able to reach agreement on the following issues regarding the scope and schedule of the proceeding.

II. SCOPING ISSUES

A. Proposed Scoping Issues Agreed Upon

The parties agreed the following issues to be within the scope of this proceeding:

1. Is there an undercollection in SDG&E's ERRA balancing account, and if so, what is the amount of the undercollection?
2. Whether SDG&E's request to recover the ERRA undercollection in commodity rates using generation revenue allocation factors over a 10-month period (beginning March 1, 2021 and ending December 31, 2021) is reasonable?
3. Whether SDG&E's proposal to make a one-time transfer of the 2020 ERRA Trigger undercollection to vintage 2020 of PABA is just, reasonable and consistent with Commission precedent?
4. Should the Commission approve SDG&E's proposal to collect the 2020 ERRA Trigger undercollection in PCIA rate adders, and if so, whether SDG&E's proposed PCIA rate adders for vintages 2020 and 2021 are just, reasonable and consistent with Commission precedent?
5. Whether SDG&E's proposal to increase PCIA rates for vintage 2020 up to the \$0.005/kWh PCIA rate cap pursuant to D.18-10-019, is reasonable and is properly calculated using the appropriate starting point for applying the half-cent cap.

B. Proposed Scoping Issues Disagreed Upon

The parties disagreed on inclusion of the following scoping issue proposed by the CCA

Parties: "*Whether SDG&E should be directed to update its billing determinants used to calculate its proposed rate adders in this proceeding.*"¹

SDG&E's Position

As set forth in greater detail in its Reply to Protest, SDG&E believes that updating sales forecasts and billing determinants is outside the scope of an ERRA Trigger Proceeding under D.02-10-062. Moreover, these very same issues involving SDG&E's sales forecast and updated billing

¹ The CCA Parties' Protest at p. 6.

determinants to develop rates are currently being addressed in two other Commission proceedings: (1) SDG&E's 2021 ERRA Forecast Application (A.20-04-014), and (2) SDG&E's General Rate Case ("GRC") Phase 2 (A.10-07-009/A.19-03-002 (cons.)). SDG&E submits that its ERRA Trigger Application is not the proper venue to litigate these issues and would only serve to delay the expedited resolution of this proceeding.

The CCA Parties' Position

For their part, the CCA Parties contend that SDG&E's Application relies on a bundled customer load forecast the utility knows is incorrect because it includes load the utility knows will depart this year. A more accurate load forecast for bundled customers has already been developed as part of the utility's 2021 ERRA Forecast Application (A.20-04-014) and should be used in this case as the basis for reasonable ratemaking. SDG&E's Reply to protests states it will use that updated forecast in this case if it is adopted in the ERRA forecast case,² meaning resolution of the issue is more akin to substituting one set of numbers for another set as opposed to drawn out litigation. Regardless, the question should be included in scope in this case to allow for revision to SDG&E's proposed rates, either (a) in response to a final decision in A.20-04-014 adopting Commissioner Guzman Aceves's Alternate Proposed Decision ("APD"), or (b) if the APD is not adopted, to ensure rates are just and reasonable.

III. SCHEDULING ISSUES

The parties have met and conferred to discuss a schedule for the proceeding. The parties submit the following alternate proposed schedules for the Commission's consideration:

² A.20-12-007, *Reply of San Diego Gas & Electric Company (U 902-E) to Protests Regarding its Expedited Application Under the Energy Resource and Recovery Account Trigger Mechanism*, p. 6 (Jan. 11, 2021).

SDG&E's Revised Proposed Schedule:

ACTION	REVISED PROPOSED DATE
Application Filed	December 11, 2020
Protests	January 5, 2021
Reply to Protests	January 11, 2021
Prehearing Conference	January 14, 2021
Opening Briefs	January 22, 2021
Reply Briefs	January 29, 2021
Proposed Decision	February 5, 2021
Concurrent Comments on Proposed Decision	February 9, 2021
Commission Decision Adopted	February 11, 2021

The CCA Parties' Proposed Schedule:

ACTION	REVISED PROPOSED DATE*
Application Filed	December 11, 2020
Protests	January 5, 2021
Reply to Protests	January 11, 2021
Prehearing Conference	January 14, 2021
Deadline for Parties to Confirm Need for Testimony and Hearing (if not needed, SDG&E's revised proposed schedule above could be adopted)	January 19, 2021
Intervenor Testimony	January 22, 2021
Evidentiary Hearings	January 28-29, 2021
Opening Briefs	February 4, 2021
Reply Briefs	February 10, 2021
Proposed Decision	February 17, 2021
Opening Comments on Proposed Decision	February 22, 2021
Reply Comments on Proposed Decision	February 25, 2021
Commission Decision Adopted	March 4, 2021 (CPUC Voting Meeting)

* These dates are the same as those in the CCA Parties' Protest but for the addition of the January 19, 2021 deadline. As the CCA Parties will explain in more detail at the prehearing conference, it is not possible for the CCA Parties to state with certainty at this time whether they will need to submit testimony as part of this proceeding.

If a March 4 decision date will not allow SDG&E to implement rates prior to April 1, a June 1 implementation date can still allow for timely and stable ratemaking. In fact, a later

implementation date could avoid the need for more than one mid-year rate change if a separate ERRA trigger proceeding is initiated between today and June 1 as a result of the 2021 ERRA rates pending in A.20-04-014, *i.e.*, if the Revised Proposed Decision is adopted.

IV. MISCELLANEOUS ISSUES

A. The CCA Parties' Request for Expedited Discovery

SDG&E and the CCA Parties have met and conferred on the CCA Parties' request for expedited discovery but did not reach a resolution.

The CCA Parties' Position

The CCA Parties believe the schedule the utility proposes is simply too short to accommodate longer timelines. The CCA Parties requested in their Protest that the Commission approve a deviation from the traditional ten business day response time for discovery requests and instead adopt a shortened time for responding to discovery requests within five calendar days of receiving the request. The CCA Parties understand SDG&E's concerns (discussed below) and believe a reasonable compromise would be for SDG&E to state on the record at the prehearing conference that the utility will strive to meet a five calendar-day turn-around for discovery requests. If, on a "case by case basis", the utility cannot meet that deadline, it can promptly inform the CCA Parties to ascertain whether different timelines may be sufficient.

SDG&E's Position

SDG&E objects to a blanket reduction of time to respond to data requests. SDG&E should not be required to respond to an unknown number of data requests on an expedited basis without first having the opportunity to review the specific data requests and evaluate the extent of the requests and burden involved in responding. Instead, SDG&E suggests that any party serving data requests should request an expedited response on a case by case basis. That way, SDG&E can evaluate the scope of the data requests and make a good faith assessment as to whether it is feasible to provide the response on an expedited basis.

V. CONCLUSION

The parties look forward to participating in the prehearing conference currently scheduled for January 14, 2021.

Respectfully submitted,

/s/ Roger A. Cerda

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