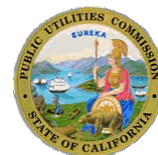


**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

03/19/21  
04:59 PM

Order Instituting Rulemaking to Consider New Approaches to Disconnections and Reconnections to Improve Energy Access and Contain Costs.

Rulemaking 18-07-005  
(Filed July 12, 2018)

**REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) TO  
ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING RESPONSES AND  
REPLIES TO FOUR QUESTIONS CONCERNING PIPP COST RECOVERY**

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March 19, 2021

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OF THE STATE OF CALIFORNIA**

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**I. INTRODUCTION**

Pursuant to Rule 6.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), San Diego Gas & Electric Company (SDG&E) respectfully provides its Reply Comments to the Administrative Law Judge’s Ruling Requesting Comments and Replies to Four Questions Concerning PIPP Cost Recovery in the above-captioned proceeding.

**II. DISCUSSION**

**A. TURN’s Cost Recovery Argument Is Speculative**

The Utility Reform Network (TURN) repeats the same flawed cost recovery argument in its March 5 opening comments as it does in its January 8 opening comments—that, as a result of instituting the PIPP, a program meant to reduce customer utility bills, the utilities will be recovering more revenue than they otherwise would.<sup>1</sup> In other words, TURN argues that where customers would previously have been unable to pay their utility bill, and therefore allegedly disconnected from service, that with a PIPP, the customer will be able to pay their bill, therefore

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<sup>1</sup> Opening Comments of The Utility Reform Network on the Administrative Law Judge’s Email Ruling Requesting Comments on Four Questions (March 5, 2021) at 1-2; Opening Comments of The Utility Reform Network on the Administrative Law Judge’s Email Ruling Requesting Responses from the Parties to Seven Questions (January 8, 2021) at 3-4.

increasing the actual amount collected by the utility.<sup>2</sup> Pursuant to this argument, TURN suggests a convoluted accounting mechanism to address this speculative increase. What TURN fails to understand is that it is irrelevant whether SDG&E is collecting more or less than it would have before PIPP. What is relevant is that SDG&E will always be collecting less with a PIPP than would otherwise have been billed. It is this amount —“the undercollection” or the difference between what is billed under PIPP and what would have been billed without PIPP—that must be accounted for and tracked for recovery with a new account mechanism. As previously stated, SDG&E proposes recovery through a two-way balancing account mechanism, either by establishing a PIPP sub-account in the Residential Uncollectible Balancing Account (RUBA), or a similar new balancing account.<sup>3</sup>

**B. SDG&E Supports a Working Group to Address CCA Concerns**

SDG&E agrees with the California Community Choice Association’s (CalCCA) original recommendation to limit the pilot to bundled customers, and that the accounting be similar to the Arrearage Management Payment (AMP) plan cost recovery in rates.<sup>4</sup> SDG&E looks forward to working with local CCAs and others in a future working group to work through cost recovery, billing, and other CCA-related issues.

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<sup>2</sup> *Id.*

<sup>3</sup> Opening Comments of San Diego Gas & Electric Company to Administrative Law Judge’s Ruling Requesting Responses and Replies to Four Questions Concerning PIPP Cost Recovery (March 5, 2021) (SDG&E Opening Comments on Cost Recovery) at 3.

<sup>4</sup> SDG&E Opening Comments on Cost Recovery at 3-5. CalCCA now states that if a longer pilot is adopted, CalCCA recommends that the PIPP pilot also include unbundled customers. *See* Response of the California Community Choice Association to the Administrative Law Judge’s E-Mailing Ruling Requesting Comments on Four Questions (March 5, 2021) at 4.

**III. CONCLUSION**

SDG&E appreciates the opportunity to provide these Reply Comments.

Respectfully submitted on behalf of SDG&E,

By: /s/ Rebecca Hansson  
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