

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



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Application of Southern California Gas Company  
(U 904 G) for Authority, Among Other Things, to  
Update its Gas Revenue Requirement and Base  
Rates Effective on January 1, 2024.

Application No. 22-05-015  
(Filed May 16, 2022)

And Related Matter.

Application No. 22-05-016  
(Filed May 16, 2022)

**JOINT MOTION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)  
AND SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)  
TO AMEND THE ASSIGNED COMMISSIONER'S  
SCOPING MEMORANDUM AND RULING**

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**I. INTRODUCTION**

Pursuant to Rule 11.1 of the California Public Utilities Commission (Commission or CPUC) Rules of Practice and Procedure (Rules), Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) (collectively, Applicants) respectfully submit this Motion to amend the October 3, 2022 Assigned Commissioner's Scoping Memo and Ruling (the Scoping Memo) in the above-captioned consolidated proceeding, also referred to herein as the Applicants' Test Year (TY) 2024 General Rate Case (GRC).

As discussed more fully in this Motion, a timely decision in a GRC proceeding not only provides regulatory certainty and demonstrates the Commission's commitment to prior decisions, it also helps protect ratepayers by reducing rate volatility and providing rate stability. The Commission's recent revision to the GRC Rate Case Plan (RCP), Decision (D.) 20-01-002 (the RCP Decision) was designed to administer GRC proceedings in such a way that delays can

be minimized and timely final GRC decisions can be realized.<sup>1</sup> Yet, less than two years after the revised schedule was adopted in the RCP Decision, and with SoCalGas and SDG&E as the first utilities to submit their GRC application under the new RCP schedule, the RCP Decision's principles have not been followed in adopting the Track 1 schedule in this Scoping Memo. Under the Scoping Memo, a proposed decision (PD) in this case will be delayed from the Rate Case Plan's November 1 date to the second quarter of the test year – by *at least* five to eight months, and possibly more. This timing does not account for a final decision and rate implementation that will likely be pushed into the third quarter of the test year, or longer if the Scoping Memo schedule is not revised.

The Scoping Memo states that its delayed Track 1 schedule is “[d]ue to significant overlap with other GRC proceedings underway at the Commission,”<sup>2</sup> which presumably refers to Pacific Gas & Electric Company's (PG&E) TY 2023 GRC proceeding and the unforeseen delay that occurred in it. However, there is nothing in the RCP Decision to suggest that a delay in one utility's GRC proceeding should lead to delays in other utilities' GRC proceedings, as the Scoping Memo suggests.<sup>3</sup> In practice, this could lead to perpetual delays in all GRC proceedings, thus rendering the carefully crafted schedule in the RCP Decision, which is in line

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<sup>1</sup> See, e.g., D.20-01-002 at 22, n.40 (regarding the timeliness of GRC final decisions, the Commission's purpose in this decision is to revise the RCP plan and schedule so that, absent intervening circumstances, the Commission can predictably meet the expectations of the applicants and intervenors.”); see also *id.* at 23 (“[W]e should change the RCP if it will improve our ability to meet our obligations under the Public Utilities Code.”); *id.* at 24 ([W]e should change the RCP if we can better satisfy the “must haves” expressed by the utilities, the Public Advocates Office, and the other parties that routinely intervene in GRC proceedings,” and noting that “[t]he utilities want the Commission to issue a timely final decision adopting their revenue requirement in time to be implemented on January 1<sup>st</sup> of the test year.”).

<sup>2</sup> Scoping Memo at 17.

<sup>3</sup> Notably, the delay in PG&E's GRC proceeding has not precluded parties from issuing discovery requests in this proceeding, nor has it precluded Applicants from responding to those requests.

with stated Commission goals, effectively useless. This “conflict” cannot justify the extreme delay. Accordingly, while SoCalGas and SDG&E acknowledge that there can be unforeseen circumstances that may require GRC decisions to slip into a test year, in this instance, there does not appear to be a compelling reason for the timing of the proposed decision in the Scoping Memo.

The Commission’s longstanding “dual” policy goals – to “minimiz[e] regulatory delay without sacrificing fairness for all parties”<sup>4</sup> – should not be abandoned. SoCalGas and SDG&E accordingly urge modifications to the Track 1 schedule in this proceeding for the policy reasons discussed herein, and adopt the amended schedule proposed in Appendix A, attached hereto, which sets a date for the proposed decision in January of 2024. The amended proposed schedule herein is reasonable, as it: (1) plans for a more timely decision, consistent with Commission policy, (2) is also, in other ways, more aligned with the recently adopted RCP Decision’s schedule and policy goals, and (3) maintains more time to draft a proposed decision than the Commission deemed reasonable in the RCP Decision. Amending the proceeding schedule will benefit ratepayers and better uphold the Commission’s recent, deliberate efforts to maintain a timely and consistent rate case schedule.

## **II. DISCUSSION**

As described in more detail below, the Scoping Memo should be amended to provide for a final decision to be implemented as reasonably close to January 1, 2024, as possible, to remain consistent with the Commission’s important policy goals of timeliness, fairness, predictability, and minimizing regulatory lag. The RCP Decision noted the importance of striving to meet these goals, to achieve predictable GRC outcomes:

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<sup>4</sup> RCP Decision at 13.

[A]n important result [that occurs] when the Commission achieves these goals is that all stakeholders, most notably the utilities' investors and customers, can rely on the Commission to process GRCs in a manner that produces predictable results.<sup>5</sup>

Although the schedule in this GRC proceeding is already experiencing delays, modifying Track 1 of the Scoping Memo's schedule to better align with the RCP Decision will "minimiz[e] regulatory delay without sacrificing fairness for all parties,"<sup>6</sup> providing a better result for customers and all stakeholders.

Also consistent with the RCP Decision's promotion of fairness and predictability for all parties, the Scoping Memo should be amended to provide a reasonable amount of time for parties to prepare concurrent rebuttal testimony and for Applicants to provide final recorded 2022 financial data to parties, as well as to address miscellaneous issues regarding GRC Update Testimony and a Joint Comparison Exhibit.

**A. The Commission Has Recognized that Timely GRC Decisions are Important to Ratepayers, Stakeholders, and the Public.**

The Commission has consistently recognized that minimizing regulatory delays is in the best interest of ratepayers and the public. The public interest is served by minimizing GRC delays, in part to avoid impacting the timing of work and capital projects, many of which are for critical safety and reliability efforts. Minimizing delays also creates greater rate stability, to the benefit of customers.<sup>7</sup> An increase in regulatory risk, such as the risk created by increased regulatory delays and uncertainty, can also adversely impact ratepayers by creating a potential

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<sup>5</sup> *Id.* at 14.

<sup>6</sup> *Id.* at 13.

<sup>7</sup> *See, e.g.*, A.21-08-013/-014/-015, Alternate Proposed Decision of President Alice Reynolds (September 30, 2022) (emphasizing the importance of the Commission's policy goals of promoting rate stability and mitigating regulatory uncertainty); *id.* at 27 ("Subjecting ratepayers to fluctuating bills based on transitory circumstances is not in the public interest.").

for credit ratings downgrades and increasing the cost of capital needed to spend on capital investment projects.<sup>8</sup> The more predictable and timely regulatory outcomes are, the lower the regulatory risk.

As noted in the RCP Decision, the Commission has long and consistently recognized that minimizing regulatory delays is in the best interest of ratepayers and the public,<sup>9</sup> and it is consistent with the regulatory compact voiced in the U.S. Supreme Court's *Hope* decision: "The rate-making process ... *i.e.*, the fixing of just and reasonable rates, involves a balancing of the investor and the consumer interest."<sup>10</sup> Noting the "important" principle that "the *benefits* to each side of the regulatory compact come with corresponding *obligations* for each side," the RCP Decision provided a review of how "the CPUC came to interpret the terms of the regulatory compact and how it would act to maintain the balance of interests contemplated by the *Hope* court." The Commission noted its longstanding commitment to the regulatory compact and the RCP Decision by mitigating "the challenges created by 'regulatory lag.'"<sup>11</sup>

Traditional GRC practice plans for rates to be effective January 1 of the test year.<sup>12</sup> SoCalGas and SDG&E typically request authority to establish memorandum accounts that track the difference between the revenues in place as of January 1 of the test year and the final

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<sup>8</sup> As the Commission has noted, "Regulatory risk assessment is ... used by rating agencies to set utility bond ratings." D.19-12-056 at 37.

<sup>9</sup> RCP Decision at 13 ("[T]he Commission has always recognized the challenges created by 'regulatory lag.'").

<sup>10</sup> *Id.* at 12, quoting *Federal Power Commission v. Hope Natural Gas Co.*, 320 U.S. 591 (1944), at 603.

<sup>11</sup> The RCP Decision defines "regulatory lag" as "the lag *during* the pendency of a rate case." The RCP Decision also notes literature findings that regulatory lag "can cause gaps in the ability of utilities to recover prudently incurred costs or, depending on the circumstances, may cause costs in the test year to be overstated." *Id.* at 13, n.22, quoting Edison Electric Institute, "Cost of Service Regulation in the Investor-Owned Electric Utility Industry: A History of Adaptation," prepared by Dr. Karl McDermott, at 15-16.

<sup>12</sup> *See, e.g.*, D.19-09-051 at 16 ("Rates are to be effective beginning January 1, 2019.").

outcome of the proceeding, to mitigate the impacts of a potentially delayed decision (such as retroactive ratemaking and cost recovery issues). For this purpose, SoCalGas and SDG&E plan to soon file a motion that will establish General Rate Case Memorandum Accounts (the GRCMAs).

If approved, the GRCMAs could help to mitigate *some* concerns regarding cost recovery risk, but they would not address all negative impacts related to regulatory delay, where a final decision is not timely issued. For example, a final GRC decision that is issued several months after January 1 of the test year still could cause harm to ratepayers, by causing them to experience backlogged rate changes and instability after a final decision, which would send inaccurate rate signals to customers and increase affordability concerns.<sup>13</sup> While there are tools to lessen the impacts of the delay, such as amortizing the memorandum account balance over a period of time, the ultimate impact is rate volatility for customers. This rate volatility could be avoided by a timely GRC decision that is implemented by January 1 of the test year.

The Commission and intervenors have recognized that promotion of rate stability is in the public interest.<sup>14</sup> And, although retroactive ratemaking concerns could be alleviated by establishing the GRCMAs, this would not address the issue of the regulatory risk incurred by utility spending in a test year that has not been authorized. Such uncertainty can lead to delays in

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<sup>13</sup> For example, in the Prehearing Conference (PHC) for this proceeding, counsel for the Utility Consumers Action Network (UCAN) specifically commented on the impact of the delay on ratepayers: “And then as far as the amount of time needed for briefing, we’re comfortable with the discussion schedule that you’ve come up with. I do have some concerns about delaying decisions into 2024. *Because once the final decision is issued, if it’s significantly delayed, customer rates will jump a lot because of the problem of just delay and additional revenues have to be collected for the period from January until when the final decision is issued.* So I don’t want to see it pushed too far back.” Prehearing Conference, Reporters’ Transcript Vol. 1 (July 27, 2022) at 128:9-20 (emphasis added).

<sup>14</sup> See, e.g., A.21-08-013/-014/-015, Alternate Proposed Decision of President Alice Reynolds (September 30, 2022) at 27 (“Subjecting ratepayers to fluctuating bills based on transitory circumstances is not in the public interest.”).



planned capital projects and operation and maintenance spending, which delays ratepayer and public benefits anticipated from those projects and requisite spending. Regulatory risk and uncertainty can also lead to the unintentional appearance in the Risk Spending Accountability Report reporting of “underspending” in the years following a severely delayed decision, where a utility does not know whether the Commission will approve its revenue requirement at the levels required to implement planned utility projects identified in GRC testimony. Further, as noted above, increased regulatory risk can impact bond ratings and the Applicants’ ability to efficiently secure capital funding for needed projects.<sup>15</sup> In short, a delayed decision creates unnecessary hurdles for a utility to manage its business.

All these factors strengthen the need to adhere to the RCP Decision’s stated goals and adopted schedule.

**B. The Scoping Memo Should Be Amended to Provide an Opportunity for a Final Decision as Reasonably Close to the Beginning of the Test Year as Possible, Consistent with the Rate Case Plan’s “Must Have” Requirements and Past GRC Precedent.**

Tardy GRC decisions are not new. Delayed GRC decisions are what led to the development of the RCP Decision’s revised schedule, with the Commission recognizing that timely decisions and procedurally fair milestone dates are important public policy goals. Examining the schedule in this proceeding next to that in the RCP Decision shows how significantly the schedule in this proceeding strays from the RCP Decision, with no clear cause.

SoCalGas and SDG&E experienced delays in receiving a proposed decision and a final Commission decision in the last three GRCs that range from almost seven, to nine, to 17 months after the beginning of the test year (for the TY 2012, TY 2019, and TY 2016 GRCs,

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<sup>15</sup> D.19-12-056 at 37 (“Regulatory risk assessment is ... used by rating agencies to set utility bond ratings.”).

respectively). While these cases were ultimately delayed, the Scoping Memo for SoCalGas's and SDG&E's two most recent GRCs (TY 2019 and TY 2016) planned for a proposed decision to be issued by the Commission before the test year. In the TY 2012 case, the Scoping Memo planned for a delayed final decision three months into the test year, in March 2012, but the Commission did not issue a final decision until 13 months after the date expected in the Scoping Memo, in June 2013 – *over 17 months delayed*. An equally “extreme” example cited in the RCP Decision was that of Southern California Edison Company's (SCE) TY 2018 GRC, where the Commission issued a final decision approximately 17 months after the beginning of the test year, and “more than 18 months after the submittal date.”<sup>16</sup> The Commission noted that “[SCE] and the other parties met the requirements and deadlines of the RCP, but the Commission, collectively, did not,”<sup>17</sup> stating:

The proceeding tracked the schedule required by the RCP through the submittal date in September 2017, when reply briefs were filed and served. From that point onward, however, the Commission did not follow the RCP.<sup>18</sup>

Recognizing the problems caused by GRC regulatory lag (which is discussed in Section A above), the Commission's stated purpose in the RCP Decision was “to revise the RCP plan and schedule so that, absent intervening circumstances, the Commission can predictably meet the expectations of the applicants and intervenors.”<sup>19</sup> There, the Commission adopted “scheduling changes, along with other procedural recommendations from the Staff Report or parties,” that “should greatly improve our ability to produce timely GRC decisions following a fair administrative hearing process, *on a schedule that provides predictable outcomes for the utilities*

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<sup>16</sup> RCP Decision at 24-25.

<sup>17</sup> RCP Decision at 25 (citation omitted).

<sup>18</sup> RCP Decision at 24.

<sup>19</sup> RCP Decision at 22, n.40.

and the stakeholders in the regulatory compact: investors and customers.”<sup>20</sup> In doing so, the Commission affirmed its longstanding commitment to upholding the regulatory compact, which includes its longstanding policy of “focus[ing] on the goals of timeliness and procedural fairness,”<sup>21</sup> leading to predictable results.<sup>22</sup>

Specifically, the Commission identified two “must-have” GRC scheduling goals the RCP Decision intended to meet and a methodology for providing them:

To simplify the solution, we can begin with two ‘must-haves’ and work backwards from those milestones to create a new RCP schedule. *First, we should plan that the Commission will issue its final decision on December 1<sup>st</sup> of the year preceding the test year.* This meets the utilities’ stated must-have and provides them with 30 days to incorporate the Commission’s decision into any rate change that takes effect on January 1<sup>st</sup> of the test year. *Second, we should modify the RCP schedule to provide the Public Advocates Office with the time it has consistently stated it requires to conduct discovery and prepare its testimony.* With these two ‘must-haves’ in place, we should also maintain the time gaps between other major milestones in the proceeding, as requested by other parties. Finally, a realistic period of time should be established for the ALJ or ALJs to draft the PD and oversee calculation of the resulting Summary of Earnings.<sup>23</sup>

As shown above, the Commission acknowledged that planning for a timely decision is a “must-have” and recognized its “dual goals” of minimizing regulatory delay, while maintaining fairness to all parties.<sup>24</sup> Despite the importance of GRC decision timing discussed in the RCP Decision, the Scoping Memo’s schedule does not plan for or provide for a timely decision.

In addition to a timely decision, the RCP Decision also indicated the importance of maintaining the time intervals between the different GRC milestones. The RCP Decision states:

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<sup>20</sup> RCP Decision at 25 (emphasis added).

<sup>21</sup> RCP Decision at 15.

<sup>22</sup> RCP Decision at 13-14 (noting that achieving timeliness and procedural fairness results in “all stakeholders, most notably the utilities’ investors and customers, [being able to] rely on the Commission to process GRCs in a manner that produces predictable results.”).

<sup>23</sup> RCP Decision at 25-26.

<sup>24</sup> *Id.* at 13.

...we find that if we modify the RCP schedule to require the utilities to file their GRC applications several months earlier, on May 15th instead of September 1st of ‘test-year minus-2’ then the Public Advocates Office can be given a realistic amount of time to prepare its testimony, and the utilities can receive their decision prior to the start of their test year, *all while preserving the other intervals between major milestones that parties have indicated are important to them.*<sup>25</sup>

The RCP Decision’s adopted schedule and intervals between dates are, thus, the result of thoughtful consideration of recommendations from CPUC Staff and parties to the RCP Rulemaking (R.) 13-11-006 and reaffirmed commitments to longstanding Commission policy, and plans for a proposed decision on November 1 and a final decision on December 1 before the beginning of the test year, so that rates can go into effect by January 1. The Scoping Memo’s schedule, in contrast, plans for a proposed decision in the second Quarter of 2024 – a *planned* proposed decision ranging from three to six months *after* the beginning of the test year. Time would then pass to allow for comment rounds, a Commission meeting, issuance of a final decision, and preparation, filing and approval of an advice letter before rates could then go into effect. And this is despite the fact that utilities now submit GRCs earlier than ever before (by May 15, two years before the test year, compared with the previous September 1 filing date ordered in D.14-12-025) pursuant to the RCP Decision.<sup>26</sup> Past experience, as well as the important policy goals and results described in the RCP Decision, demonstrates the importance of *planning* for a timely decision in the Scoping Memo – as well as careful adherence to timely and fair administration of GRC proceedings.

Table 1 below provides the Rate Case Plan events (consistent with Appendix A of D.20-01-002), the dates applied to the Applicant’s GRC, and compares that to the schedule set forth in the Scoping Memo:

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<sup>25</sup> *Id.* at 26 (emphasis added).

<sup>26</sup> *Id.* at 18, Table 1.

**Table 1: Comparison of Rate Case Plan and Scoping Memo Schedules**

Dates Adopted in Rate Case Plan, D.20-01-002	Rate Case Plan Days	Event	RCP Dates When Applied to Applicant's TY 2024 GRC	RCP Days Between Events	TY 2024 GRC Scoping Memo Dates	Scoping Memo Days Between Events	Scoping Memo Days for Event Over / (Under) RCP
Test Year minus-2							
May 15	0	Utility files GRC application, and serves prepared testimony	5/16/2022		*	5/16/2022	
By May 30	15	Utility holds public workshop on overall GRC application	5/31/2022		*	5/31/2022	
30 days after Daily Calendar notice	30	Due date for protests and responses to GRC application, pursuant to Rule 2.6(a)	6/15/2022	30	*	6/20/2022	35 5
By June 30	45	Prehearing Conference held	6/30/2022	15	*	7/27/2022	37 22
By August 15	90	Scoping Memo of Assigned Commissioner issued	8/15/2022	46	*	10/3/2022	68 22
To be decided		Public Participation Hearings				Jan 2023	
By December 15	215	Public Advocates Office and other intervenors serve opening testimony	12/15/2022	122		3/17/2023	165 43
Test Year minus-1							
By January 30	260	Concurrent rebuttal testimony served	1/30/2023	46		4/21/2023	35 (11)
By February 25	285	Evidentiary hearings begin	2/27/2023	28		5/22/2023	31 3
By March 15	305	Evidentiary hearings end	3/15/2023	16		6/16/2023	25 9
To be decided		Update testimony and hearings, if necessary					
By April 20	340	Briefs filed	4/20/2023	36		7/14/2023	28 (8)
By May 12	360	Reply briefs filed	5/12/2023	22		8/11/2023	28 6
By August 3	445	Status conference, proceeding submitted for Commission decision [Rule 13.14(a)]	8/3/2023	83		11/14/2023	95 12
By November 1	535	Proposed decision mailed for comment	11/1/2023	173		Q2 2024	234-324 <sup>1</sup> 61-151 <sup>1</sup>
By December 1	565	Final decision adopted	12/1/2023	30		-	-
Test Year							
January 1	595	Effective date of final decision	1/1/2024	31		-	-

\* Reflects actual dates that have occurred

<sup>1</sup> Difference between reply brief filed and proposed decision mailed for comment

As illustrated in Table 1 above, the Scoping Memo's schedule does not achieve the Commission-adopted "must-have" goal of issuing a timely final decision, nor does it align with the Commission-adopted and agreed-upon intervals between major milestones for GRCs.

In Appendix A, SoCalGas and SDG&E propose a revised schedule to better align the Scoping Memo with the Rate Case Plan. Applicants have based this proposal on the intervals adopted in the RCP Decision between regulatory events, with a couple of exceptions.<sup>27</sup> First, because parties requested additional time for evidentiary hearings at the PHC (given that

<sup>27</sup> The RCP Decision affords 36 days between evidentiary hearings and when opening briefs are due. Given that the 36th day fell on a weekend, two additional days were added to Applicants' proposed amended schedule, so that the filing day for opening briefs would be on a business day.

SoCalGas and SDG&E are two utilities),<sup>28</sup> Applicants' Appendix A proposal retains the Scoping Memo's 25 days between the start and end of evidentiary hearings, rather than the 20 days afforded by the RCP. Second, to avoid a planned proposed decision by December 31, 2023 (which would result if the intervals between reply briefs and a proposed decision from the RCP were adopted), Applicants propose an additional 30 days for the issuance of a proposed decision, by the end of January 2024.<sup>29</sup> The Applicants' proposed schedule in Appendix A is a reasonable plan to mitigate the impacts of the already-delayed proceeding going forward, because it is based on dates between events that the Commission found reasonable and fair to all parties and adopted in the RCP Decision.

In setting the schedule in this proceeding, the Scoping Memo offers the following as the basis for the delayed schedule:

In setting the schedule for this proceeding, I recognize the schedule does not conform with the Commission's rate case plan schedule adopted in D.20-01-002 (Rate Case Plan Decision). Due to significant overlap with other GRC proceedings underway at the Commission, the Rate Case Plan Decision could not have contemplated a delayed schedule.<sup>30</sup>

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<sup>28</sup> Prehearing Conference, Reporters' Transcript Vol. 1 (July 27, 2022) at 105:3-106:26.

<sup>29</sup> Applicants also note that Rule 13.15(a) provides for automatic submission of the proceeding for a decision by the Commission "after the taking of evidence, the filing of briefs, and the presentation of oral argument as may have been prescribed" – in other words, after reply briefs are filed, unless oral arguments are requested and held pursuant to Rule 13.14. It is thus unclear why both the RCP Decision (at 49) and the Scoping Memo (at 18) both list "Status conference, proceeding submitted for Commission decision [Rule 13.14(a)]" as a necessary GRC event, months after reply briefs are filed and the proceeding would have already been submitted automatically as a function of Rule 13.15(a), by either the end of briefing or oral argument, if presented. The references to Rule 13.14(a) appear to be in error. Nevertheless, Applicants have retained this event in their Appendix A proposed schedule, because it appears in the RCP Decision. If the Assigned Commissioner and ALJ determine, however, that the event is unnecessary and should be removed to allow more time after submission to prepare a proposed decision, Applicants would agree with that change.

<sup>30</sup> Scoping Memo at 17.

SoCalGas and SDG&E recognize that there are events that occur outside of their control that may impact this proceeding. For example, there is currently a GRC proceeding underway for PG&E, A.21-06-021, for Test Year 2023 that has experienced delay. However, this does not warrant a planned three-to-six-month delay beyond the beginning of the test year for submittal of a proposed decision – which amounts to a five-to-seven month deviation from the Rate Case Plan. Planning at this early stage of the proceeding for a six-month delay is unreasonable (per the CPUC’s policy guidance stated in the RCP Decision) and could lead to a much longer delay in practice (according to historical experience). A schedule that includes a delay of this magnitude in receiving a proposed decision and even longer to receive a final decision can lead to unstable rates, increasing affordability issues, and sending incorrect price signals.

There are numerous examples of the disconnect between the Rate Case Plan schedule and the time between milestones in the Scoping Memo’s schedule that are unexplained, and which are inconsistent with SoCalGas and SDG&E’s having timely-filed their GRC applications:

- Intervenor testimony is due more than three months after it would be due under the Rate Case Plan (March 17 compared to December 15).
- In total, the Scoping Memo gives intervenors 304 days to draft their testimony – 90 days more than what is allowed in the Rate Case Plan, and even 17 days more than intervenors requested.<sup>31</sup> This is substantially more than in the scoping memos of past GRCs as well (TY 2019 GRC, 220 days; TY 2016, 182 days).<sup>32</sup>

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<sup>31</sup> Joint PHC Statement (July 18, 2022) at 5 “TURN Schedule Proposed, Intervenor Testimony Served, February 28, 2023” *cf.*, Scoping Memo at 18, “Intervenor Testimony, March 17, 2023.”

<sup>32</sup> A.17-10-007/-008 (cons.), Assigned Commissioner’s Scoping Memorandum and Ruling (January 29, 2018) at 7; A.14-11-004, Assigned Commissioner’s Scoping Memo and Ruling (February 5, 2015) at 9-10.

- Recorded expenditures for 2022 are due before intervenor testimony, even though certain intervenors acknowledged that recorded expenditures would be acceptable if served before hearings.<sup>33</sup>
- Under the Scoping Memo, the Proposed Decision is due between 235 and 315 days after reply briefs are due, compared to 175 days in the Rate Case Plan – in the best-case scenario (a Proposed Decision is issued April 1<sup>st</sup>) this plans for a delay of at least 60 days (34%), and up to a 140 days (80%) (a Proposed Decision is issued June 30<sup>th</sup>).
- Total time from filing until Proposed Decision is between 686 days and 776 days, compared to 535 days in the Rate Case Plan – a delay of at least 151 days (28%), up to 241 days (45%).

Comparing the schedule in the Scoping Memo to the schedule in PG&E's current GRC proceeding can show how a GRC can proceed efficiently despite unexpected setbacks. PG&E's current rate case has been hampered by a number of challenges and circumstances that have delayed the proceeding:

- Per the Rate Case Plan,<sup>34</sup> PG&E filed its GRC a month and a half later in the year than SoCalGas and SDG&E.
- For the first time since 1997, PG&E's GRC combines its general rate case and gas transmission and storage proceedings.<sup>35</sup>
- PG&E was ordered to file an amended application and to add new testimony because "undergrounding work proposed in PG&E's announcement could have a substantial impact on the forecasts in this proceeding for PG&E's wildfire-related mitigation programs, especially during the attrition years of this rate case cycle."<sup>36</sup>

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<sup>33</sup> See, e.g., Protest of TURN (June 20, 2022) at 7 ("Even if that timing [of the adjusted base year + 1 data] potentially precludes intervenors from using this data in their direct testimony, this timing will preserve many of the opportunities available under the old Rate Case Plan for incorporating Base Year+1 recorded data into the GRC.").

<sup>34</sup> RCP Decision at 51.

<sup>35</sup> A.21-06-021, 2023 GRC Amended Application of PG&E (March 10, 2022) at 1.

<sup>36</sup> A.21-06-021, Assigned Commissioner's Scoping Memo and Ruling (October 1, 2021) at 7. This contrasts with this proceeding, where SoCalGas is removing the Ventura Compressor Modernization Project, a project that had received substantial attention from certain parties and would have required time and resources from parties and the Commission to litigate.



- PG&E filed an amended application to incorporate the announced information on March 10, 2022.<sup>37</sup>

Despite the many delays caused by different challenges, PG&E is scheduled to get a Proposed Decision in Q2 of 2023 – at the same point in their test year as SoCalGas and SDG&E’s current schedule, despite SoCalGas and SDG&E having filed a month and a half prior to PG&E’s original Application. From the time of PG&E’s filing to when it gets a Proposed Decision, it will be between 640 and 730 days after filing their original application, which is approximately 45 days earlier than SoCalGas and SDG&E. A chart comparing the dates in the PG&E GRC and this proceeding is included as Appendix B, attached hereto.

To seek parties’ input on the Appendix A schedule prior to filing this Motion, SoCalGas and SDG&E held a meet and confer call with parties to the proceeding on October 19, 2022. All parties opposed the Applicants’ schedule except for the Coalition of California Utility Employees, who took no position. SoCalGas and SDG&E recognize that the schedule in Appendix A would provide less time than the Scoping Memo to prepare intervenor testimony. However, meeting the important public policy goals noted in the RCP Decision and above – *e.g.*, avoiding the potential harm to customers, minimizing GRC delays, reducing regulatory risk, maintaining rate stability, maintaining procedural fairness, and meeting procedural expectations – outweigh intervenors’ objections. Moreover, the Appendix A schedule provides more time

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<sup>37</sup> A.21-06-021, 2023 GRC Amended Application of PG&E (March 10, 2022) at 1. As previously noticed to the service list in this proceeding, SDG&E is currently preparing to file a motion seeking leave to serve supplemental testimony regarding enhancements to SDG&E’s risk modeling and revised proposals regarding two grid hardening initiatives—strategic undergrounding and covered conductor—to reflect those enhancements. SDG&E’s proposed revisions will result in a reduction in its requested revenue requirement for the TY 2024 GRC cycle. SDG&E notes that it has worked diligently to ensure transparency regarding its intention to revise its revenue requirement requests regarding a limited number of issues and, even assuming intervenor testimony is served in February 2022—as requested by this Motion—parties still have approximately four months to review and prepare their positions on SDG&E’s proposed changes.

from the date SoCalGas and SDG&E filed their Applications to submit intervenor testimony (262 days) than the Commission-adopted RCP Decision (213 days). Given these facts, Appendix A's time allowance for intervenor testimony preparation is more than fair.

Additionally, intervenors have been on notice and had the opportunity to review the Applicants' Applications, conduct discovery, and prepare their testimony since May 16, 2021 – for the past five months. Despite intervenors' protests that PG&E's case diverted focus from the instant proceeding, Staff and intervenors have been propounding discovery and still have until early February under the Applicants' revised schedule to continue their review and preparation. Additionally, PG&E's GRC proceeding is in its late stages, with reply briefs due in early December. Accordingly, the Applicant's proposed schedule will allow for a fair process and proceeding while at the same time balancing customer interests. Additional delays are neither needed, warranted, nor fair.

For all these reasons, the Scoping Memo should be revised to adhere to the stated Commission policy prioritizing timely and efficient GRC decisions prior to the beginning of the test year. Given the delays already experienced in this proceeding and the overlap with PG&E's 2023 GRC, SoCalGas and SDG&E propose a reasonable revised schedule that provides for a proposed decision in late January of the test year. Accordingly, the Applicants' proposed amended schedule as set forth in Appendix A should be adopted.

**C. The Scoping Memo Should Be Amended to Adhere to the Commission's Stated Goals of Fairness and Predictability, as Set Forth in the RCP Decision and Provided for in Its Adopted Schedule.**

As noted above, the RCP Decision prioritized procedural fairness as well as timeliness, to provide predictable outcomes for the utilities and stakeholders in a GRC.<sup>38</sup> Below, SoCalGas

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<sup>38</sup> RCP Decision at 25.

and SDG&E outline three additional requested scheduling changes shown in Appendix A that will promote consistency with the RCP Decision's adopted schedule, as well as with the Commission's stated goals of procedural fairness and predictability. Specifically, the Scoping Memo should be amended: (1) to provide a workable due date for providing final recorded 2022 expenditures that the Applicants can meet, (2) to provide a reasonable amount of time for participants to prepare rebuttal testimony, and (3) to address miscellaneous issues regarding the GRC Update Phase and service of a Joint Comparison Exhibit.

**1. The Scoping Memo's due date for providing final recorded 2022 expenditures should be amended.**

The Scoping Memo's March 1 due date for providing final recorded 2022 expenditures inadvertently does not allow Applicants sufficient time to analyze and adjust the data for use in the TY 2024 GRC purposes, and therefore should be revised. To SoCalGas and SDG&E's knowledge, no investor-owned utility has been able to produce recorded base year + 1 data in a GRC proceeding by March 1. SoCalGas and SDG&E request a more practicable due date of March 22, 2023, to allow time to adjust and analyze the data to render it compatible for use in the GRC.

As SoCalGas and SDG&E informed the Commission before the RCP Decision was issued, their raw financial data reflecting prior year actual spend is usually not available until the end of February.<sup>39</sup> Upon release of the data, it must then be analyzed and adjusted to be

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<sup>39</sup> See, e.g., R.13-11-006, Opening Comments of SoCalGas and SDG&E on the Proposed Decision Modifying the Commission's Rate Case Plan for Energy Utilities (October 24, 2019) at 3 ("The IOUs' financial data, reflecting prior year actual spend, is usually not available until the end of February, hampering the utility's ability to analyze, adjust, and incorporate this data into the RSAR and SPMR reports as well as the GRC forecasts within the March timeframe.").

compatible with data used in Applicants' direct testimony.<sup>40</sup> The Commission took this fact into account in adopting the RCP Decision's schedule, for example, by moving the filing date for IOUs' RAMP and GRC applications dates from March 1 in the Proposed Decision to May 15 in the RCP Decision.<sup>41</sup>

Additionally, although SoCalGas and SDG&E agree with providing the adjusted recorded 2022 data, such data has always been provided as part of discovery, in the past – not as a GRC Rate Case Plan requirement or as a scheduled item in Applicants' GRC proceedings. The Commission could have, but did not, adopt a requirement to provide the information by a certain date as part of its adopted schedule in the RCP Decision. Moreover, the GRC Rate Case Plan does not allow for continuous updating of all data in a case,<sup>42</sup> and, as the Commission noted in SDG&E and SoCalGas's TY 2019 final decision, "it is generally not feasible or prudent to continue to update forecasts to reflect actual data during the pendency of the GRC proceeding."<sup>43</sup>

Thus, although base year + 1 data may prove to be a useful data point for comparison with direct case forecasts in some circumstances, it is not part of the direct case or an RCP requirement, and it should not determine the due date for Public Advocates Office's (Cal

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<sup>40</sup> D.13-05-010 at 19, stating that, before base year + 1 data can be used in a GRC ("the Commission needs to ensure that the recorded data is in a format 'compatible with the other years of recorded data in order to derive trends and forecasts.'") (quoting D.08-07-046 at 9).

<sup>41</sup> Compare the schedule set forth in R.13-11-006, Proposed Decision of Commissioner Rechtschaffen (October 4, 2019), Appendix A, with the schedule adopted in the RCP Decision, Appendix A.

<sup>42</sup> See, e.g., D.21-08-036 (citing D.07-07-004, Appendix A at A-36, noting the Commission's Energy Utility Rate Case Plan limits the scope of update testimony to three categories).

<sup>43</sup> D.19-09-051 at 612; see also *id.* at 612-13 ("The GRC proceeding is comprised of a multitude of forecasts based on an even greater amount of historical data. But because the GRC proceeding extends over a considerable period of time, newer and more recent data becomes available while the proceeding is pending. However, in order to be able to conclude the proceeding, it is reasonable and prudent for the Commission to stop considering updated information at some point in time. Otherwise, the proceeding may be subjected to continuously review and consider constant updates leading to inconsistencies if only certain forecasts or information were to be updated.").

Advocates) and other intervenors' direct testimony. In fact, the RCP Decision's schedule calls for intervenor testimony to be due on December 15, two years prior to the test year, when base year + 1 data would not have been fully recorded. Under the RCP schedule, it is impossible to tie together the dates of intervenor testimony to the production of base year + 1 data and there is no Commission decision doing so. Rather, parties would have ample opportunity to use the information in evidentiary hearings and/or in briefing. TURN's protest is consistent with this conclusion: "Even if that timing [of the adjusted base year + 1 data] potentially precludes intervenors from using this data in their direct testimony, this timing will preserve many of the opportunities available under the old Rate Case Plan for incorporating Base Year+1 recorded data into the GRC."<sup>44</sup>

Finally, as shown in Appendix B, in PG&E's TY 2023 GRC (A.21-06-021), the scoping memo set a date of March 22, 2022 for PG&E to provide base year + 1 data.<sup>45</sup> Consistent with PG&E's GRC, the Applicants request that the date be moved to March 22, 2023 as shown in Appendix A, to accommodate sufficient time to process 2022 data. To the extent 2022 data is available prior to March 22, 2023, the Applicants will provide this information to parties through discovery responses, consistent with past GRCs, and will publish it on its Discovery Portal for parties to the proceeding.

**2. The Scoping Memo should provide a reasonable amount of time for participants to prepare rebuttal testimony.**

SoCalGas and SDG&E are very concerned about the truncated length of time provided in the Scoping Memo to prepare and serve concurrent rebuttal testimony. This extremely short period of time is unprecedented for Applicants' GRCs, at least in recent history, and does not

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<sup>44</sup> Protest of TURN (June 20, 2022) at 7.

<sup>45</sup> See A.21-06-021, Assigned Commissioner's Scoping Memo and Ruling (October 1, 2021) at 14.

appear workable. The TY 2019 GRC schedule, for example, provided over two months between the time that the Office of Ratepayer Advocates’ (now Cal Advocates) direct testimony was served and the time that concurrent rebuttal testimony was due:

**Table 2: 2019 GRC Scoping Memo Schedule**

<b>Event</b>	<b>Dates</b> (all dates are for 2018)
Supplemental Testimony on Impact of Disconnections for Nonpayment Served	February 7
Supplemental Testimony on Tax Issues Served	April 6
ORA Report Served	April 13
ORA Report on Tax Issues Served	April 27
Intervenor Testimony Served	May 14
Public Participation Hearings	May and June
Rebuttal Testimony Served	June 18

This additional time and staggered deadlines in the TY 2019 schedule allowed all parties to review Cal Advocates’ testimony first, prior to reviewing other intervenors’ direct testimony, which provided parties the opportunity to analyze and narrow the issues over time. Under the previously staggered process, intervenors would file their direct testimony approximately one month after Cal Advocates, and concurrent rebuttal testimony for all parties would be due approximately one month after that. Even under the staggered scheduling provided in previous proceedings, these deadlines historically have been tight and challenging to meet – especially in recent GRC proceedings, given their size and complexity and the number of intervenors submitting testimony.

The RCP Decision modified this staggered scheduling process, in response to Cal Advocates’ request for additional time to conduct discovery and prepare testimony, after carefully considering all recorded arguments by the parties in R.13-11-006 proceeding. The Commission-adopted schedule shortened the time for preparation of concurrent rebuttal to Cal

Advocates' testimony by two weeks, but allowed for two additional weeks to prepare concurrent rebuttal to all intervenors' testimony. The RCP Decision essentially split the difference between the amount of time previously allowed for Applicants to respond to Cal Advocates' testimony and the amount of time previously allowed to respond to intervenors' testimony.

The Scoping Memo's schedule, in contrast, provides an abbreviated period of 35 days for the parties to conduct discovery on intervenors' testimony and prepare rebuttal testimony, while still not allowing for a timely final decision before the beginning of the test year. This 35-day period is significantly less than in the adopted schedules in the Scoping Memos for most other recent utility rate cases and is, notably, 11 days less than allowed in the RCP Decision's adopted schedule, as shown in Table 1 above.

Additionally, allowing sufficient rebuttal time is important to the efficient administration of the case. During the rebuttal period, parties review and analyze other parties' analysis and positions, and develop their own sworn testimony in response. Failing to allow for sufficient time in the rebuttal phase of a proceeding could result in issues not being fully developed and clearly explained in rebuttal testimony, which could cause confusion and difficulty in conducting hearing cross-examination and in ultimately determining issues and writing a proposed decision.

For this reason, Applicants have proposed March 20, 2023 for the due date for concurrent rebuttal testimony, 46 days after intervenor testimony is submitted in the Applicants' proposed revised schedule. The interval of 46 days between intervenor and concurrent rebuttal testimony is fair and reasonable, as it aligns with the Commission-adopted RCP schedule, and should be adopted.

**3. The Scoping Memo should be amended to address miscellaneous issues regarding the GRC Update Phase and service of a Joint Comparison Exhibit.**

The Scoping Memo provides that parties may request permission for “Updated” Testimony by June 16, 2023.<sup>46</sup> The Scoping Memo does not provide a date for as-needed evidentiary hearings on Update Testimony.

Applicants request revising the Scoping Memo’s scheduling treatment of the Update Testimony Phase, as it is inconsistent with the GRC Rate Case Plan and longstanding precedent and practice. The provision of “Update Testimony” is a specific, limited, event noted in the GRC Rate Case Plan,<sup>47</sup> and it should not be confused with an opportunity to provide “Updated Testimony.” The Commission provides that “Update Testimony” submitted during the Update Phase of the GRC be limited to a narrow scope of issues, as expressly described in the GRC Rate Case Plan:

- (1) Known changes in cost of labor based on contract negotiations completed since the tender of the notice of intent or known changes that result from updated data using the same indexes used in the original presentation during hearings;
- (2) Changes in non-labor escalation factors based on the same indexes the party used in its original presentation during hearings; and
- (3) Known changes due to governmental action such as changes in tax rates, postage rates, or assessed valuation.<sup>48</sup>

Thus, requesting permission to provide update testimony should be unnecessary, because the GRC Rate Case Plan already provides that an Update Testimony phase should be

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<sup>46</sup> Scoping Memo at 18.

<sup>47</sup> See, e.g., D.21-08-036 at 554-556 (“[t]he Commission’s Rate Case Plan allows for certain *limited*, known cost changes to be reflected through *update testimony*.”) (emphasis added) (citation omitted).

<sup>48</sup> See D.21-08-036 at 180 (citing D.07-07-004, Appendix A, p. A-36).



accommodated in the schedule. Such Update Testimony may also be the subject of additional hearings, “if necessary.”<sup>49</sup>

In the Scoping Memo in PG&E’s TY 2023, similar to the Scoping Memo events in this proceeding, the Commission originally established a date to seek leave to submit Update Testimony. The Scoping Memo was subsequently amended, however, to remove this requirement to seek permission and instead set dates for PG&E to submit Update Testimony pursuant to D.07-07-004 and Evidentiary Hearings on Update Testimony (if any).<sup>50</sup>

Like PG&E’s GRC, the Commission should establish a date for the Applicants to submit Update Testimony limited to the role and scope of Update Testimony in the traditional Rate Case Plan. With this clarification, there would be no need for a motion for leave to provide “updated testimony,” as this procedural event is a normal event in every GRC. The schedule could instead set a due date for Update Testimony of May 22, 2023, consistent with the date proposed for Update Testimony in the schedule that was circulated in this proceeding prior to the Prehearing Conference for discussion purposes.<sup>51</sup> The Commission should also reserve a date for an evidentiary hearing on the Update Testimony, should an evidentiary hearing be requested and needed, as customary in GRCs. SoCalGas and SDG&E propose eight days between the submission of Update Testimony and the evidentiary hearing date, if needed, which is consistent with the timing originally scheduled in PG&E’s 2023 GRC.<sup>52</sup>

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<sup>49</sup> RCP Decision at 49, Table 3: Adopted Revised GRC Application Filing Schedule.

<sup>50</sup> A.21-06-021, Email Ruling Addressing Pending Motions & Request to Modify Schedule and Adopting Revised Schedule (April 12, 2022) at Attachment 2.

<sup>51</sup> Email from ALJ Manisha Lakhanpal to the service list of A.22-05-015/-016 (July 27, 2022) providing a revised document with procedural schedule for discussion during the PHC.

<sup>52</sup> A.21-06-021, Email Ruling Addressing Pending Motions & Request to Modify Schedule and Adopting Revised Schedule (April 12, 2022) at Attachment 2, Update Testimony, if any was due on September 7, 2022, and hearing, if any was September 14, 2022.

In addition to changes to Update Testimony, GRC schedules also typically provide for a date by which a Joint Comparison Exhibit would be served.<sup>53</sup> For example, the scoping memo in Applicants' TY 2019 proceeding, A.17-10-007, provided dates for Update Testimony, potential hearings, and a Joint Comparison Exhibit, in between evidentiary hearings and opening briefs.<sup>54</sup> The Applicants propose a due date of June 5, 2023 for the Joint Comparison Exhibit, which is the date included in the schedule circulated for discussion purposes ahead of the PHC.<sup>55</sup>

For these reasons, Applicants recommend that the Track 1 schedule be modified as shown in Appendix A, to change "Updated" to "Update," to demonstrate that "Update Testimony" refers to the testimony expressly permitted by the GRC Rate Case Plan, to eliminate the need for parties to seek permission to submit update testimony,<sup>56</sup> to add a date for a potential evidentiary hearing on Update Testimony (if needed), and to provide for the opportunity for parties to prepare and serve a Joint Comparison Exhibit.

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<sup>53</sup> See, e.g., RCP Decision at 47 ("[W]e note that the GRC record also typically includes a joint comparison exhibit that compares the positions of parties.").

<sup>54</sup> A.17-10-007/-008 (cons.), Assigned Commissioner Scoping Ruling and Memorandum (January 29, 2018) at 7

<sup>55</sup> Email from ALJ Manisha Lakhanpal to the service list of A.22-05-015/-016 (July 27, 2022) providing a revised document with procedural schedule for discussion during the PHC. Date for Joint Comparison Exhibit was June 4, 2023. The Applicants proposed June 5, 2023 in Appendix A, because June 4 is a weekend.

<sup>56</sup> SoCalGas and SDG&E also note that a similar revision was adopted in PG&E's pending GRC schedule. See e.g., A.21-06-021, Email Ruling Addressing Pending Motions & Request to Modify Schedule and Adopting Revised Schedule (April 12, 2021) at Attachment 2, Update Testimony, if any was due on September 7, 2022, and hearing, if any was September 14, 2022.

### III. CONCLUSION

For all the reasons set forth above, SoCalGas and SDG&E respectfully request that the Scoping Memo's schedule be revised consistently with Appendix A.

Respectfully submitted,

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October 27, 2022

## **APPENDIX A**

### **APPLICANTS' PROPOSED AMENDED SCHEDULE**

Line No.	Event	RCP Dates When Applied to Applicant's TY 2024 GRC	RCP Days Between Events		TY 2024 GRC Scoping Memo Dates	Scoping Memo Days Between Events		Applicants' Proposed Amended Schedule	Applicants' Proposed Amended Days Between Events	Difference of Proposed Schedule and RCP Days Between Events	Calculation of Days Between Events
(1)	Utility files GRC application, and serves prepared testimony	5/16/2022		*	5/16/2022		*	5/16/2022			
(2)	Prehearing Conference held	6/30/2022		*	7/27/2022		*	7/27/2022			
(3)	Scoping Memo of Assigned Commissioner issued	8/15/2022	46	*	10/3/2022	68	*	10/3/2022	68		Line (3) - (2)
(4)	Supplemental Affordability Testimony	-	-		11/18/2022	-		11/18/2022	-		
(5)	Public Participation Hearings	TBD	-		Jan 2022	-		Jan 2022	-		
(6)	Base Year + 1 Recorded Data	-	-		3/1/2023	-		3/22/2022	-		
(7)	Public Advocates Office and other intervenors serve opening testimony	12/15/2022	122		3/17/2023	165		2/2/2023	122	0	Line (7) - (3)
(8)	Concurrent rebuttal testimony served	1/30/2023	46		4/21/2023	35		3/20/2023	46	0	Line (8) - (7)
(9)	Evidentiary hearings begin	2/27/2023	28		5/22/2023	31		4/17/2023	28	0	Line (9) - (8)
(10)	Evidentiary hearings end	3/15/2023	16		6/16/2023	25		5/12/2023	25	9	Line (10) - (9)
(11)	Parties Request Permission for Update Testimony	-	-		6/16/2023	-		Propose to delete	-		
(12)	Update Testimony	TBD	-		-	-		5/22/2023	-		
(13)	Evidentiary hearing on Update Testimony (if needed)	-	-		-	-		5/30/2023	8		Line (13) - (12)
(14)	Joint Comparison Exhibit	-	-		-	-		6/5/2023	-		
(15)	Opening Briefs filed	4/20/2023	36		7/14/2023	28		6/19/2023	38	2	Line (15) - (10)
(16)	Reply Briefs filed	5/12/2023	22		8/11/2023	28		7/11/2023	22	0	Line (16) - (15)
(17)	Status conference, proceeding submitted for Commission decision [Rule 13.14(a)]	8/3/2023	83		11/14/2023	95		10/2/2023	83	0	Line (17) - (16)
(18)	Proposed decision mailed for comment	11/1/2023	173		Q2 2024 <sup>1</sup>	279		1/30/2024	203	30	Line (18) - (16)
(19)	Final decision adopted	12/1/2023	30		-	-		-	-		
(20)	Effective date of final decision	1/1/2024	31		-	-		-	-		
(21)	Total days from application filing to proposed decision		534			731			624		

Notes:

\* Reflects actual dates that have occurred

<sup>1</sup> Assumes middle of Q2 (May 16)

## **APPENDIX B**

### **APPLICANTS' PROPOSED AMENDED SCHEDULE COMPARED WITH 2023 PG&E GRC SCHEDULE**

Line No.	Event	RCP Dates When Applied to Applicant's TY 2024 GRC	RCP Days Between Events	TY 2024 GRC Scoping Memo Dates	Scoping Memo Days Between Events	PG&E TY 2023 GRC Scoping Memo Dates	PG&E TY 2023 GRC Scoping Memo Days Between Events	PG&E TY 2023 GRC Actual Dates	PG&E TY 2023 GRC Actual Days Between Events	Applicants' Proposed Amended Schedule	Applicants' Proposed Amended Days Between Events	Calculation of Days Between Events
(1)	Utility files GRC application, and serves prepared testimony	5/16/2022	*	5/16/2022	*	6/30/2021	*	6/30/2021	*	5/16/2022		
(2)	Prehearing Conference held	6/30/2022	*	7/27/2022	*	8/30/2021	*	8/30/2021	*	7/27/2022		
(3)	Scoping Memo of Assigned Commissioner issued	8/15/2022	46	10/3/2022	68	10/1/2021	32	10/1/2021	32	10/3/2022	68	Line (3) - (2)
(4)	Supplemental Affordability Testimony	-	-	11/18/2022	-	2/28/2022	-	2/23/2022	-	11/18/2022	-	
(5)	Amended Application	-	-	-	-	Seek permission	-	3/10/2022	-	-	-	
(6)	Public Participation Hearings	TBD	-	Jan 2022	-	Jan/Feb 2022	-	March 2022	-	Jan 2022	-	
(7)	Base Year + 1 Recorded Data	-	-	3/1/2023	-	3/22/2022	-	3/9/2022	-	3/22/2022	-	
(8)	Public Advocates Office and other intervenors serve opening testimony	12/15/2022	122	3/17/2023	165	3/30/2022	180	6/13/2022	95	2/2/2023	122	Line (8) - (3), except PG&E actuals Line (8) - (5)
(9)	Concurrent rebuttal testimony served	1/30/2023	46	4/21/2023	35	4/29/2022	30	7/11/2022	28	3/20/2023	46	Line (9) - (8)
(10)	Evidentiary hearings begin	2/27/2023	28	5/22/2023	31	5/16/2022	17	8/15/2022	35	4/17/2023	28	Line (10) - (9)
(11)	Evidentiary hearings end	3/15/2023	16	6/16/2023	25	5/31/2022	15	8/26/2022	11	5/12/2023	25	Line (11) - (10)
(12)	Parties Request Permission for Update Testimony	-	-	6/16/2023	-	6/13/2022	-	-	-	-	-	
(13)	Update Testimony	TBD	-	-	-	6/17/2022	-	9/6/2022	-	5/22/2023	-	
(14)	Evidentiary hearing on Update Testimony Start (if needed)	-	-	-	-	7/11/2022	24	9/21/2022	15	5/30/2023	8	Line (14) - (13)
(15)	Evidentiary hearing on Update Testimony End (if needed)	-	-	-	-	7/13/2022	2	9/23/2022	2	-	-	Line (15) - (14)
(16)	Joint Comparison Exhibit	-	-	-	-	7/20/2022	-	9/30/2022	-	6/5/2023	-	
(17)	Opening Briefs filed	4/20/2023	36	7/14/2023	28	8/31/2022	92	11/4/2022	70	6/19/2023	38	Line (17) - (11)
(18)	Reply Briefs filed	5/12/2023	22	8/11/2023	28	9/30/2022	30	12/9/2022	35	7/11/2023	22	Line (18) - (17)
(19)	Status conference, proceeding submitted for Commission decision [Rule 13.14(a)]	8/3/2023	83	11/14/2023	95	-	-	-	-	10/2/2023	83	Line (19) - (18)
(20)	Proposed decision mailed for comment	11/1/2023	173	Q2 2024 <sup>1</sup>	279	Q2 2023 <sup>1</sup>	228	Q2 2023 <sup>1</sup>	158	1/30/2024	203	Line (20) - (18)
(21)	Final decision adopted	12/1/2023	30	-	-	Q2 2023	-	Q3 2023	-	-	-	
(22)	Effective date of final decision	1/1/2024	31	-	-	-	-	-	-	-	-	
(23)	Total days from application filing to proposed decision	534		731		685		685		624		

Notes:

\* Reflects actual dates that have occurred

<sup>1</sup> Assumes middle of Q2 (May 16)