

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



Order Instituting Rulemaking to Establish
Energization Timelines.

R.24-01-018
(Filed January 25, 2024)

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**RESPONSE OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) TO
ADMINISTRATIVE LAW JUDGE'S RULING PROVIDING DIRECTION FOR
LARGE ELECTRIC INVESTOR-OWNED UTILITIES TO COMPLY WITH
ORDERING PARAGRAPH 8 OF DECISION 24-09-020**

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November 27, 2024

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I. INTRODUCTION

San Diego Gas & Electric Company (“SDG&E”) hereby submits its Response to the Administrative Law Judge’s (“ALJ”) Ruling issued on November 14, 2024, in Rulemaking (R.) 24-01-018. This Response is provided in accordance with the directions set forth in the Ruling and complies with Ordering Paragraph (“OP”) 8 of Decision (D.) 24-09-020, as well as the applicable provisions of Assembly Bill 50. SDG&E appreciates the opportunity to address the questions and requirements outlined in the Ruling.

II. BACKGROUND

OP 8 of D.24-09-020 requires Pacific Gas and Electric Company (“PG&E”), Southern California Edison Company (“SCE”), and SDG&E to demonstrate compliance with Public Utilities Code § 933.5(b). Specifically, the utilities must file individual reports with the California Public Utilities Commission (“CPUC” or “Commission”) demonstrating that at least 80 percent of customers with energization applications deemed complete as of January 31, 2023, have had their projects energized. Applications withdrawn, canceled, or with customer-requested energization dates beyond December 1, 2024, are excluded from this calculation.

Specific requirements for compliance were provided in the ALJ Ruling. Each large electric investor-owned utility must file a response that includes detailed information such as:

- The number of completed energization applications with timelines exceeding 12 months as of January 31, 2023.
- The number of customers whose applications were approved but not energized within 12 months.
- The number of applications that remain unenergized as of December 1, 2024, and whether this exceeds the statutory threshold of 35%.
- Aggregated data regarding withdrawn or canceled applications, including reasons provided by customers or utilities.
- Data on project delays due to factors outside the utility's control, along with aggregated reasons for these delays.

Additionally, the Ruling allows utilities to address whether they are bound by Public Utilities Code § 933.5(b)(2) and requires them to post these reports publicly on their respective websites.

III. RESPONSES TO QUESTIONS 1 THROUGH 7 IN THE RULING

In this section, SDG&E provides responses to each of the questions outlined in the Ruling. SDG&E notes that it had not historically been mandated to consistently track and report on completed/approved applications and energization dates. However, SDG&E has been making improvements towards consistent tracking of completed applications and energization dates. Accordingly, the responses provided below are based on best available reliable data. To support these responses, data has been included in Attachment A.

1. The number of customers that had completed energization project applications with timelines that had exceeded 12 months as of January 31, 2023.

Based on these parameters,¹ SDG&E had 37,154 completed applications as of January 31, 2023. Of those 37,154 completed applications, 10,320 applications had timelines that exceeded 12 months as of January 31, 2023.

¹ Parameters were Rule 15, Rule 16, Rule 45, Rule 15/16, Rule 15/45, and Main Panel Upgrade (MPU) jobs with completed applications between January 1, 2018 to January 31, 2023 that exceeded 12

- 2. The number of customers with completed applications filed as of January 31, 2023, that did not have their projects energized within 12 months of the application being fully approved by the large electric IOU.**

SDG&E does not distinguish between “completed applications” and “approved applications.” An application that is complete is an application that is approved. As a result, the data set and results are identical to SDG&E’s response to Question 1.

- 3. The number of customers that had approved energization project applications as of January 31, 2023, whose projects have not yet been, or will not be, energized as of December 1, 2024.**

2,418 of the 37,154 approved applications as of January 31, 2023 identified in response to Question 1 have not yet been, or will not be energized as of December 1, 2024.²

- 4. Whether the number of customers described in question 3, above, exceeds 35% of the number of customers that had completed energization applications with project timelines that exceeded 12 months as of January 31, 2023.**

SDG&E energized 7,902 of the 10,320 approved applications that had timelines that exceeded 12 months as of January 31, 2023. Accordingly, SDG&E energized 77% of projects with completed applications with a timeline that exceeded 12 months as of January 31, 2023.³ This 77% result exceeds the 35% performance metric set forth in Pub. Util. Code § 933.5 (b)(1), and therefore, as explained in Section IV below, SDG&E should be exempt from the implementing requirements set forth in Pub. Util. Code § 933.5 (b)(2). Regardless, SDG&E will continue to assess efficiencies to reduce energization project timelines.

In addition, SDG&E energized 34,736 of the 37,154 completed applications as of January 31, 2023. Accordingly, SDG&E has energized 93% of customers with completed applications as of January 31, 2023 per OP 8 of D.24-09-020.

months to energize. SDG&E’s system documents “completed applications” per job as Applicant Final Submittal or “AFS.” SDG&E’s system documents “energized” as either transformer/backbone energized or meter set, as applicable. SDG&E does not track jobs by Customer.

² Based on the same data set parameters established for Question 1. Data set includes project status up to November 20, 2024. There may be additional jobs energized between November 20, 2024 and December 1, 2024, but that information was not available when the data was pulled.

³ Based on the data set parameters and responses for Questions 1 and 3.

5. The number of withdrawn application and aggregated data on the reasons, if any, a customer provided when withdrawing the application.

10,608 applications were either withdrawn or cancelled.⁴ SDG&E’s existing system does not currently track reasons for customer withdrawal or cancellation of applications and does not differentiate between withdrawn or cancelled applications.

6. The number of canceled applications and aggregated data of reasons for which the large electric IOU or customer(s) canceled the request.

SDG&E does not distinguish between withdrawn and cancelled applications. An application that is withdrawn is an application that is cancelled. As a result, the data set and results are identical to SDG&E’s response to Question 5.

7. The number of projects that are delayed due to factors outside the large electric IOU’s control and aggregated data for the reasons for the project(s) delay.

SDG&E’s existing system does not currently track project delays due to factors outside of SDG&E’s controls and reasons for delays.

IV. SDG&E SHOULD BE EXEMPT FROM THE REQUIREMENTS OF PUBLIC UTILITIES CODE SECTION 933.5(b)(2)

The Ruling provides that “if any large electric IOU contends it is not bound by Pub. Util. Code § 933.5(b)(2) to provide and implement actions necessary for the large electric IOU to meet the performance metrics adopted in Pub. Util. Code § 933.5(b)(1), it shall provide a detailed explanation of the basis for that contention in its response to this ruling. Any large electric IOU providing this contention shall support its contention using the data requested in questions posed in Section 2, of this ruling, Compliance with Assembly Bill 50 and OP 8 of D. 24-09-020.”

SDG&E respectfully submits that it should exempt from the requirements of Pub. Util. Code § 933.5(b)(2) as it exceeded the performance metrics adopted in Pub. Util. Code § 933.5(b)(1). As demonstrated in the responses above, SDG&E energized 77% of projects with

⁴ Withdrawn or cancelled jobs are not included in total approved jobs (not included in responses to questions 1-4).

completed applications with a timeline that exceeded 12 months as of January 31, 2023. This 77% result exceeds the 35% performance metric set forth Pub. Util. Code § 933.5 (b)(1). The data supporting this contention is provided in Attachment A. Although SDG&E is exempt from the statutory requirement, in compliance with OP 8 of D. 24-09-020 and as stated in response to Question 4 above, SDG&E has energized 93% of customers with applications deemed completed by January 31, 2023, excluding applications withdrawn, canceled, or with customer-requested energization dates beyond December 1, 2024. Accordingly, SDG&E has demonstrated that it exceeded the 80% energization performance threshold outlined within Pub. Util. Code §933.5(b)(1).

V. CONCLUSION

SDG&E appreciates the opportunity to submit this response in compliance with the ALJ's Ruling and OP 8 of D.24-09-020.

Respectfully submitted,

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ATTACHMENT A

AB50 Requirement: 933.5 (b) (1) In order to demonstrate improvement in energization performance and the resolution of backlogs of customers waiting for electricity, each electrical corporation that energized less than 35 percent of customers with completed applications exceeding 12 months in duration by January 31, 2023, shall submit a report to the commission, on or before December 1, 2024, demonstrating that the electrical corporation has energized 80 percent of customers with applications deemed complete as of January 31, 2023, excluding applications withdrawn, canceled, or with customer-requested energization dates beyond December 1, 2024. The commission may conduct an analysis of current energization status and adjust these thresholds and deadlines.

SDG&E energized **93%** of customer applications deemed complete as of January 31, 2023.

Calculation: Number of total jobs (37,154) minus number of non-energized jobs (2,418) divided by total job population (37,154)

93%

Responses to Questions 1 and 2

Aging Months	Number of Jobs	Percentage
0-12 Months	26834	72.22%
13-18 Months	2790	7.51%
18-23 Months	2325	6.26%
24-35 Months	2846	7.66%
36-47 Months	1185	3.19%
48+ Months	1174	3.16%
Grand Total	37,154	100%

Response to questions 1 and 2 (Jobs exceeding 12 months) 10,320

Question 3

Aging Months	Number of Jobs	Percentage
18-23 Months	364	15.05%
24-35 Months	756	31.27%
36-47 Months	464	19.19%
48+ Months	834	34.49%
Grand Total	2,418	100%

Response for question 3 (Approved jobs that have not been energized or will not energized): 2,418

Question 4

Percentage of applications that exceeded 12 months **77%** 10,320 (Question 1&2) minus 2,418 (Question 3) divided by 10,320 (Question 1&2)

Question 5

Canceled Jobs **10,608**
Note: canceled jobs are not included in total approved jobs (not included in question 1, 2, 3, and 4)

Question 6

Same as Question 5