

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



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Application of San Diego Gas & Electric
Company (U 902 M) to Submit Its 2025 Risk
Assessment and Mitigation Phase Report.

Application No. 25-05-____

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) TO
SUBMIT ITS 2025 RISK ASSESSMENT AND MITIGATION PHASE REPORT**

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TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION	1
II. GUIDING PRINCIPLES	2
III. BACKGROUND AND PROCEDURAL HISTORY	4
IV. CONSOLIDATION OF SDG&E’S AND SOCALGAS’S RAMP APPLICATION PROCEEDINGS	6
V. OVERVIEW OF SDG&E’S AND SOCALGAS’S RAMP REPORTS	6
VI. ROADMAP OF CHAPTERS WITHIN THE REPORT	7
VII. STATUTORY AND PROCEDURAL REQUIREMENTS.....	9
A. Rule 2.1(A) - Legal Name	9
B. Rule 2.1(b) - Correspondence	10
C. Rule 2.1(c).....	10
D. Rule 2.2 - Articles of Incorporation	12
VIII. SERVICE	12
IX. RELIEF SOUGHT	13
X. CONCLUSION.....	13

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I. INTRODUCTION

In compliance with California Public Utilities Commission (Commission or CPUC) Decisions (D.) 14-12-025, D.16-08-018, D.18-12-014, D.20-01-002, D.21-11-009, D.22-10-002, D.22-12-027, D.24-05-064, and the Commission’s Rules of Practice and Procedure (Rules), San Diego Gas & Electric Company (SDG&E) hereby submits its 2025 Risk Assessment and Mitigation Phase (RAMP) Application and attached RAMP Report, the first step in the submission of its test year (TY) 2028 General Rate Case (GRC). D.20-01-002 (the Rate Case Plan Decision) requires SDG&E and Southern California Gas Company (SoCalGas) to concurrently file their RAMP Applications and Reports by May 15 of the year falling three years prior to the next future GRC test year – in this case, 2028.¹

The SDG&E RAMP Report’s primary purpose is to “examine [SDG&E’s] assessment of its key risks and its proposed programs for mitigating those risks.”² SDG&E’s RAMP Report describes SDG&E’s diligent preparation and compliance with applicable decisions, as shown in the roadmap provided in Appendix 2 to the 2025 RAMP Report. SDG&E remains mindful of its duties to prioritize safety and to “furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities ... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.”³ In addition to describing SDG&E’s compliance with the CPUC’s prescribed RAMP processes and

¹ D.20-01-002 at 49 (Table 3: Adopted Revised GRC Application Filing Schedule). SDG&E and SoCalGas will concurrently file their respective TY 2028 GRC applications on May 15, 2026. *Id.*

² D.14-12-025 at 31 (citation omitted).

³ Pub. Util. Code § 451.

methodologies, SDG&E's RAMP Report provides qualitative information essential to understanding the quantitative assessments required by the Commission decisions and how SDG&E approaches risk.

The 2025 RAMP Report is SDG&E's fourth RAMP filing, following the 2016, 2019, and 2021 RAMP Reports.⁴ SDG&E's last RAMP Report was submitted on May 15, 2021, and was the first to present safety risks in the manner required under D.18-12-014 and the Settlement Agreement adopted therein (collectively, the Settlement Decision).⁵ Since the time of filing SDG&E's 2021 RAMP Application and Report, the Commission has issued four separate decisions in Rulemaking (R.) 20-07-013 – D.21-11-009, D.22-10-002, D.22-12-027, and D.24-05-064 – which provide additional modifications to the CPUC's Risk-Based Decision-Making Framework (RDF), including the rules governing RAMP submissions. Pacific Gas and Electric Company (PG&E) was the first utility to submit a RAMP Report under D.21-11-009 and D.22-12-027, and PG&E's 2024 RAMP Report and the feedback it has received have informed SDG&E and SoCalGas in preparing their 2025 RAMP Reports. SDG&E and SoCalGas are the first utilities to submit a RAMP Report under the new requirements of D.24-05-064. A summary of the relevant decisions and procedural history of the RDF is provided below.

II. GUIDING PRINCIPLES

SDG&E's risk-informed decision-making is guided foremost by a commitment to delivering safe and reliable energy to customers at a reasonable cost. This commitment includes the prevention of catastrophic, serious injury or loss-of-life events, protracted service interruptions, and the associated financial losses to customers and the public that may stem from such events.⁶ As part of its risk-informed decision-making, SDG&E accounts for the potential

⁴ After the filing of the Companies' 2019 RAMP reports, which were intended to inform their respective TY 2022 GRCs, the Commission issued the Rate Case Plan Decision, which modified the GRC cycles of the large energy utilities, eliminating the Companies' TY 2022 GRCs. The Commission issued D.20-09-004, which closed the 2019 RAMP proceeding and clarified that the Companies' respective 2019 RAMP Reports would not be integrated into each Company's next GRC application.

⁵ D.18-12-014 adopted the Settlement Agreement with modifications and continued and modified requirements previously established in D.16-08-018 and the risk-based decision-making frameworks adopted in D.14-12-025.

⁶ See R.20-07-013, SoCalGas and SDG&E's Joint Reply Comments to S-MAP Phase 4 Workshop #2 (January 16, 2025) at 10 ("the primary goal of risk management is to constrain risk outcomes to

for far-ranging impacts from low-frequency and high-consequence risk events. Correspondingly, many of the risk mitigations included in the RAMP Report are pivotal in preventing or minimizing the potential for serious safety events – what is referred to as “tail risk” events – even when mitigation of such events is not fully accounted for by the RDF’s prescribed quantitative RAMP modeling. Accordingly, and in addition to meeting the RDF requirements for evaluating mitigations, SDG&E endeavors to describe supplemental criteria and considerations, including mitigation of tail risk events, in the risk chapter descriptions, consistent with the Commission’s recognition that various factors may influence the selection of risk mitigations.⁷

SDG&E is committed to continuous improvement in risk-informed decision making to advance the effectiveness of its risk mitigation activities for the benefit of customers, the public, the environment, employees, and contractors while striving to deliver the greatest benefits to customers at the most affordable cost. To that end, this RAMP filing reflects SDG&E’s advancement in data modeling and quantification, including enhanced probabilistic risk modeling, data-driven tranching, and scaling, as applicable, and as facilitated by data availability. In doing so, SDG&E strives to transparently disclose data sources and calculations and demonstrate the value of alternative methods, where authorized under the RDF. SDG&E’s intent is to evolve and continuously improve upon its risk management capabilities in alignment with best practices and regulatory expectations.

With each iteration of its RAMP Report, SDG&E demonstrates increasingly advanced risk-informed decision making supported by richer data and enhanced analytical capabilities. These advancements enable SDG&E to develop deeper insights and implement more sophisticated risk mitigation strategies than ever before. The Data Availability and Quality Assessment Reports⁸ submitted by SDG&E on December 6, 2024, outlines its anticipated data collection plans to improve data availability and quality for application in the RDF. SDG&E

tolerable levels, which is why risk tolerance is the first constraint to observe in evaluating mitigations (not cost).”).

⁷ D.22-12-027, RDF Row 26 (“Mitigation selection can be influenced by other factors including, but not limited to, funding, labor resources, technology, planning and construction lead time, compliance requirements, Risk Tolerance thresholds, operational and execution considerations, and modeling limitations and/or uncertainties affecting the analysis.”).

⁸ D.24-05-064 at 125 (Ordering Paragraph (OP) 4).

remains committed to refining its risk management decision-making to advance safer, more resilient, and cost-effective energy delivery to benefit customers, as well as the public.

SDG&E also recognizes that the risk landscape is increasingly dynamic and evolving. This demands that risk assessments and mitigation strategies remain agile and adaptable. The RAMP Report presents SDG&E's current risk assessment and mitigation strategies to address risk and the cost-effectiveness of those mitigation strategies. SDG&E's risk analysis and mitigation planning will continue to evolve, and changes in scope or scale, including to the risk landscape, risk models, or financial forecasts, will be presented in the GRC.

III. BACKGROUND AND PROCEDURAL HISTORY

On November 14, 2013, the Commission opened R.13-11-006, *Order Instituting Rulemaking to Develop a Risk-Based Decision-Making Framework to Evaluate Safety and Reliability Improvements and Revise the Rate Case Plan for Energy Utilities*. The purpose of that Rulemaking was to incorporate a risk-based decision-making framework into the Rate Case Plan (RCP) for the energy utilities' GRCs, in which utilities request funding for safety-related activities. Further, the State Legislature enacted California Public Utilities Code (Pub. Util. Code) Section 963, which states that "[i]t is the policy of the state that the commission and each gas corporation place [the] safety of the public and gas corporation employees as the top priority."⁹ In 2014, the California Legislature added Section 750 to the Pub. Util. Code, which directs the Commission to "develop formal procedures to consider safety in a rate case application by an electrical corporation or gas corporation."¹⁰

As a result of these directives, in D.14-12-025, the Commission adopted a risk-based decision-making framework into the Rate Case Plan for the energy utilities' GRCs. Further, it established two new proceedings to address risk assessment procedures, the S-MAP and RAMP. These proceedings inform the subsequent GRC applications.

On May 1, 2015, as ordered in D.14-12-025, SDG&E, SoCalGas, PG&E, and Southern California Edison (SCE) filed S-MAP Applications (A.) 15-05-002, A.15-05-003, A.15-05-004, and A.15-05-005, which were consolidated on June 19, 2015, as A.15-05-002 and Related

⁹ Pub. Util. Code § 963(b)(3).

¹⁰ Pub. Util. Code § 750.

Matters. Phase One of that proceeding explored the models the utilities proposed in their applications to identify and manage risks.

On August 18, 2016, the Commission issued D.16-08-018 (the Phase 1 Interim S-MAP decision), which adjudicated the consolidated S-MAP applications, determined the format of future RAMP submissions, and directed the utilities to develop a more uniform approach to risk management in Phase 2 of that proceeding. On May 2, 2018, SoCalGas, SDG&E, PG&E, SCE, and other settling parties filed a Joint Motion for Approval of a Settlement Agreement in A.15-05-002 (cons.). The Commission adopted the S-MAP Settlement Agreement with modifications in D.18-12-014.

On November 4, 2021, the Commission issued D.21-11-09, which approves technical changes to the RDF, including RAMP analyses for all mitigations (including those formerly known as controls), requiring utilities to treat Public Safety Power Shutoffs (PSPS) as risk events within the RDF framework (not just as a mitigation), changing RAMP baselines to the start of the new GRC cycle, and adopting a revised S-MAP Lexicon.

On October 6, 2022, the Commission issued D.22-10-002, which approves additional changes to the RDF affecting RAMP, including the requirement that utilities must provide graphics of historical progress in their RAMP reports illustrating what safety work has been accomplished and what work remains to be done (including information over the two preceding RAMP cycles), and various cost mapping and reporting requirements.

On December 12, 2022, the Commission adopted D.22-12-027 (the Phase 2 Decision), which supersedes the Commission's adoption of the S-MAP Settlement Agreement in D.18-12-014. The Phase 2 Decision adopts a Cost-Benefit Approach (CBA) that requires utilities to report on risk in monetized terms – dollars – for purposes of creating “utility risk and Mitigation Benefit calculations that are more useful during review and consideration of RAMP and GRC filings.”¹¹ The Phase 2 Decision also requires utilities to file an Environmental and Social Justice (ESJ) Pilot Study Plan (PSP) as part of their next RAMP filing. Accordingly, SDG&E has included its ESJ PSP as part of its 2025 RAMP Report.

On May 30, 2024, the Commission adopted significant additional changes to the RDF RAMP requirements by adopting D.24-05-064 (the Phase 3 Decision). New provisions in the

¹¹ D.22-12-027 at 26.

Phase 3 Decision include: a requirement that utilities present cost benefit ratios (CBRs) for each general rate case post-test year and continue to use and test Transparency Pilot Guidelines in conjunction with RAMP; adoption of a methodology for implementing tranches and a process for utilities to employ an alternative methodology; incorporation of a truncated power law distribution model for wildfire tail risk modeling and a process for using other modeling approaches; and numerous other technical requirements described more fully within this Report.

SDG&E demonstrates compliance with the Commission’s RAMP requirements in Appendix 2 of the 2025 RAMP Report and reinforces this compliance throughout.

IV. CONSOLIDATION OF SDG&E’S AND SOCALGAS’S RAMP APPLICATION PROCEEDINGS

As noted above, the Rate Case Plan Decision required the Companies to concurrently file their RAMP Applications and Reports by May 15, 2025.¹² SDG&E and SoCalGas share the same parent company, Sempra. Specific chapters in SDG&E’s and SoCalGas’s respective RAMP Reports set forth the same or similar facts and circumstances and are jointly sponsored. Consistent with past proceedings and Rule 7.4, SDG&E and SoCalGas anticipate the consolidation of their respective RAMP proceedings, as consolidation would promote efficiency and avoid scheduling conflicts. Therefore, SDG&E and SoCalGas plan to expeditiously move to consolidate their RAMP proceedings under Rule 7.4 upon initiation of the proceedings, unless the Commission or assigned Administrative Law Judge(s) does so *sua sponte*.¹³

V. OVERVIEW OF SDG&E’S AND SOCALGAS’S RAMP REPORTS

The instant RAMP proceeding is considered the first phase of each Company’s next (TY 2028) GRC. “The purpose of the RAMP is to examine the utility’s assessment of its key risks and its proposed programs for mitigating those risks.”¹⁴ The assessment is largely based on past conditions and events experienced by the Companies and/or their industries. SDG&E’s Report presents eight risk chapters (seven of which are specific to SDG&E), and SoCalGas’s

¹² D.20-01-002 at 55 (Table 4).

¹³ See, e.g., A.21-05-011/014 (cons.), Email Ruling Consolidating [SDG&E and SoCalGas’s] RAMP Applications (June 8, 2021); I.19-11-010/011 (cons.), Administrative Law Judge’s Ruling Consolidating Proceedings and Setting Prehearing Conference Schedule (November 21, 2019).

¹⁴ D.14-12-025 at 31 (citation omitted).

Report presents seven risk chapters (six of which are specific to SoCalGas), and each Company's Report also contains one joint risk chapter (Cybersecurity).

While developing their respective reports, SoCalGas and SDG&E met with stakeholders and held a public workshop on December 17, 2024, to discuss their approach to the RAMP Reports. The workshop was intended to gather information from stakeholders and to provide stakeholders with an overview of certain aspects of the RAMP Reports. More specifically, the workshop focused on SoCalGas and SDG&E's risk selection and risk scoring, as well as on SoCalGas and SDG&E's alternative tranching methodology, which was also presented in a whitepaper served on November 1, 2024.¹⁵

From past lessons learned and the workshop, SoCalGas and SDG&E made a number of improvements since the 2021 RAMP filing, as explained in Volume 1, Chapter RAMP-1. In addition, and in response to stakeholder feedback, SoCalGas has included the Underground Storage Risk in its 2025 RAMP showing.¹⁶ SoCalGas and SDG&E have also refined the alternative tranching methodology and endeavored to improve the transparency and clarity around the methodology in response to stakeholder feedback.

VI. ROADMAP OF CHAPTERS WITHIN THE REPORT

The RAMP Report, appended to this Application, comprises two volumes and one appendix, beginning with the following volume of introductory chapters that lay the foundation of this filing and explain the methodologies used throughout:¹⁷

SDG&E Introductory Chapters (Volume 1)
Chapter RAMP-1: Overview (SoCalGas/SDG&E)
Chapter RAMP-2: Enterprise Risk Management Framework (SoCalGas/SDG&E)
Chapter RAMP-3: Risk Quantification Framework (SoCalGas/SDG&E)

¹⁵ The White Paper was served consistent with the direction provided in D.24-05-064. SoCalGas and SDG&E's alternative tranching methodology is further discussed in Chapter RAMP-3: Risk Quantification Framework.

¹⁶ Although it was not in the top 40% of SoCalGas's Enterprise Risk Registry (ERR) risks, the Underground Storage Risk is of interest to stakeholders and is therefore being included in the final list.

¹⁷ Volume 1, Chapters RAMP-1, RAMP-2, RAMP-3, and RAMP-4 are jointly sponsored by SoCalGas and SDG&E; Chapter RAMP-5 is company-specific.

SDG&E Introductory Chapters (Volume 1)
Chapter RAMP-4: Safety Culture (SoCalGas/SDG&E)
Chapter RAMP-5: Climate Change Adaptation (SDG&E)

The Volume 1 Chapters are organized as follows:

- **Chapter RAMP-1 (joint)** provides an overview of the requirements for SoCalGas's and SDG&E's RAMP Reports, how the Companies have met the requirements, and changes and updates since the Companies' 2021 RAMP Reports. Chapter RAMP-1 also provides an overview of the organization of each Volume 1 Introductory Chapter and each Volume 2 Risk Chapter, and lessons learned by SoCalGas and SDG&E in developing the RAMP Reports and reviewing the RAMP filings of SCE and PG&E.
- **Chapter RAMP-2 (joint)** presents SoCalGas's and SDG&E's risk philosophy and objectives, their Enterprise Risk Management (ERM) Framework, explains the selection of RAMP risks, and discusses continuous improvement and changes to the Enterprise Risk Registry since 2022.
- **Chapter RAMP-3 (joint)** explains the quantitative methodology used for establishing SoCalGas's and SDG&E's Cost-Benefit Ratio (CBR) calculations and tranching methodology.
- **Chapter RAMP-4 (joint)** discusses SoCalGas's and SDG&E's safety culture, executive and board involvement in safety, and compensation policies to incentivize a strong commitment to safety.
- **Chapter RAMP-5** discusses SDG&E's approach to managing risk associated with Climate Change.

SDG&E's RAMP risk chapters are presented as identified below.

SDG&E RAMP Risk Chapters (Volume 2)	
Chapter	Subject
SDG&E-Risk-1	Excavation Damage
SDG&E-Risk-2	High Pressure Gas System
SDG&E-Risk-3	Medium Pressure Gas System
SDG&E-Risk-4	Wildfire and PSPS
SDG&E-Risk-5	Electric Infrastructure Integrity
SDG&E-Risk-6	Employee Safety
SDG&E-Risk-7	Contractor Safety
SCG-Risk-8/SDG&E-Risk-8	Cybersecurity

The following appendices are attached to the RAMP Report.

Appendices	
Chapter	Subject
RAMP-App-1	Glossary of Terms
RAMP-App-2	2025 RAMP Roadmap
RAMP-App-3	SoCalGas/SDG&E's Alternative Tranching White Paper
RAMP-App-4	ESJ Pilot Study – SDG&E
RAMP-App-5	Cost Benefit Ratio Ranking

VII. STATUTORY AND PROCEDURAL REQUIREMENTS

SDG&E files this Application according to D.18-12-014, D.20-01-002, D.21-11-009, D.22-10-002, D.22-12-027, and D.24-05-064, Section 701 of the Public Utilities Code, and Article 2 of the Commission's Rules of Practice and Procedure.

A. Rule 2.1(A) - Legal Name

San Diego Gas & Electric Company is a corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. SDG&E's principal place of business is 8330 Century Park Court, San Diego, California 92123.

B. Rule 2.1(b) - Correspondence

Correspondence or communications regarding this Application should be addressed to:

Kathleen H. Cordova
GRC Program Manager
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8326 Century Park Court
San Diego, California 92123
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with copies to:

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San Diego, CA 92123
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Facsimile: (619) 699-5027
E-mail: slcohen@sdge.com

Data requests should be submitted via the SoCalGas and SDG&E Discovery Portal.

Access to the Discovery Portal may be requested by submitting via email the following requestor information to SempraDiscovery@semprautilities.com:

- the proceeding name;
- the organization's name;
- the primary contact details (first/last name, email, phone, job title); and
- other participant's details (first/last name, email, phone, job title) who will submit, receive or view data requests/responses and or view attachments in Discovery Portal.

Requestors should also specify whether access is needed to workpapers, data requests, or both.

C. Rule 2.1(c)

1. Proposed Category of Proceeding

In accordance with Rule 7.1, SDG&E requests that this Application be categorized as ratesetting pursuant to Commission Rule of Practice and Procedure 1.3(e) and 7.1(e)(2).

2. Need for Hearings

SDG&E does not believe that evidentiary hearings on SDG&E's RAMP are necessary and notes that evidentiary hearings are not contemplated by the Commission's proceeding schedule in D.20-01-002.

3. Issues to be Considered and Relevant Safety Considerations

The principal issues to be considered are whether:

- The Commission should adopt the Companies' proposed schedule for the Safety Policy Division (SPD) to evaluate and issue a report on SDG&E's RAMP Report and for parties to file comments, consistent with the Rate Case Plan Decision's revised filing schedule;¹⁸ and
- The Commission should expeditiously close this proceeding upon such time as the SPD submits its report and parties have submitted all scheduled comments, in late December 2025, to permit SDG&E and SoCalGas the opportunity to consider SPD's evaluation and other parties' comments prior to the filing of the Companies' TY 2028 GRC applications in May 2026, consistent with D.20-01-002.¹⁹

With respect to safety considerations, SDG&E's RAMP Report focuses on safety and effective risk mitigation. It includes SDG&E's top enterprise safety risks and plans to mitigate those risks.

4. Proposed Schedule

In accordance with the scheduling requirements set forth in D.20-01-002, SDG&E proposes the following schedule be adopted for this proceeding. SoCalGas is also proposing the same schedule in its concurrently filed RAMP application, in anticipation of a consolidated proceeding.

¹⁸ D.20-01-002 at 49 (Table 3: Adopted Revised GRC Application Filing Schedule).

¹⁹ D.20-01-002 at 48 (stating the Commission's intent to "create additional time for [the Safety and Enforcement Division] and parties to complete their review of the utility's RAMP farther in advance of the subsequent GRC filing date, so that the utility has as much time as possible to meaningfully incorporate the results of this review in its GRC application.").

Proposed Procedural Schedule	
Event	Proposed Date
Application Filed	5/15/2025
Workshop on the Companies' Applications	6/20/2025
Protests or Responses	Approx. 6/16/2025
Reply to Protests or Responses	Approx. 6/28/2025
Prehearing Conference	July 2025
Assigned Commissioner Scoping Memo and Ruling	7/30/2025
SPD Staff Report	9/1/2025
Opening Comments on Companies' Applications and SPD Report	11/15/2025
Reply Comments	12/1/2025
Companies file their respective Test Year 2028 GRC Applications	5/15/2026

D. Rule 2.2 - Articles of Incorporation

A copy of SDG&E's Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission on September 10, 2014, in connection with SDG&E Application 14-09-008, and is incorporated herein by reference.

VIII. SERVICE

A copy of this Application and a link to SDG&E's 2025 RAMP Report²⁰ has been served via email on the following service lists:

1. R. 20-07-013, Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities;
2. R.18-04-019 Order Instituting Rulemaking to Consider Strategies and Guidance for Climate Change Adaptation;

²⁰ Due to its large size, a link to the as-filed version of SDG&E's 2025 RAMP Report has been served via email, pursuant to Rule 1.10(c).

3. A.22-05-015 and A.22-05-016 (consolidated), SoCalGas's and SDG&E's 2024 General Rate Case Applications; and
4. A.21-05-011 and A. 21-05-014 (consolidated) SoCalGas's and SDG&E's 2021 RAMP Applications.

Supporting workpapers have also been made available via the SoCalGas and SDG&E Discovery Portal.

IX. RELIEF SOUGHT

SDG&E respectfully requests:

- Adoption of the Companies' proposed schedule to review SDG&E's and SoCalGas's RAMP Reports and issue a report and for parties to file comments, consistent with the requirements of D.14-12-025 and D.20-01-002; and
- The Commission expeditiously close this proceeding upon such time as the SPD submits its report and parties have submitted all scheduled comments, in late December 2025, to permit SDG&E and SoCalGas the opportunity to consider SPD's report and other parties' comments prior to the Companies' filing of their upcoming TY 2028 GRC applications, in May 2026, consistent with D.20-01-002.

X. CONCLUSION

SDG&E respectfully requests that the Commission provide the relief sought in Section IX above.

Respectfully submitted,

/s/ Sharon L. Cohen

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Attorney for:
San Diego Gas & Electric Company

May 15, 2025

OFFICER VERIFICATION

I, Michael M. Schneider, declare the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M) TO SUBMIT ITS 2025 RISK ASSESSMENT AND MITIGATION PHASE REPORT** are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 15, 2025, at San Diego, California.

By: /s/ Michael M. Schneider
Michael M. Schneider

SDG&E RAMP REPORT