

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of Southern California Gas
Company (U904G) to Submit Its 2025
Risk Assessment and Mitigation Phase
Report.

Application 25-05-010

And Related Matter.

Application 25-05-013

**OPENING COMMENTS OF THE PUBLIC ADVOCATES OFFICE
ON SEMPRA'S 2025 RAMP APPLICATIONS AND
THE SAFETY POLICY DIVISION'S EVALUATION REPORT**

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BEFORE THE PUBLIC UTILITIES COMMISSION
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Application of Southern California Gas Company (U904G) to Submit Its 2025 Risk Assessment and Mitigation Phase Report.	Application 25-05-010
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I. INTRODUCTION

Pursuant to the *Assigned Commissioner’s Scoping Memo and Ruling*¹ on August 11, 2025, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby submits these opening comments on the 2025 Risk Assessment and Mitigation Phase (RAMP) Applications of Southern California Gas Company’s (SoCalGas) Application (A.) 25-05-010² and San Diego Gas & Electric Company’s (SDG&E) A.25-05-013,³ (collectively referred to herein as Sempra), regarding their RAMP Reports,⁴ and the corresponding Safety Policy Division (SPD) Evaluation Report on Sempra’s 2025 RAMP Applications (SPD Report).⁵

¹ A.25-05-010/013, *Assigned Commissioner’s Scoping Memo and Ruling*, August 11, 2025.

² A.25-05-010, *Application of Southern California Gas Company (U 904 G) to Submit its 2025 Risk Assessment and Mitigation Phase Report* (SoCalGas 2025 RAMP Application), May 15, 2025.

³ A.25-05-013, *Application of San Diego Gas & Electric Company (U 902 M) to Submit its 2025 Risk Assessment and Mitigation Phase Report* (SDG&E 2025 RAMP Application), May 15, 2025.

⁴ SoCalGas 2025 RAMP Report and SDG&E 2025 RAMP Report.

⁵ A.25-05-010/013, *Safety Policy Division Evaluation Report on Sempra’s 2025 RAMP Applications (A.)25-05-010/013* (SPD Report), October 10, 2025.

Several intervenors, including Cal Advocates, submitted informal comments to SPD on Sempra's RAMP Applications on September 4, 2025.^{6,7} On October 10, 2025, SPD issued the SPD Report. This report provides the results of SPD's evaluation of Sempra's RAMP Report which informs the 2028 Test Year (TY2028) General Rate Case (GRC) cycle and subsequent post-test years through to 2031.⁸ The SPD Report identifies deficiencies in and recommends improvements to the utility and the Commission to further consider in the GRC.⁹ Cal Advocates supports the recommendations in the SPD Report which require SDG&E to:

1. Provide detailed documentation of its mitigation selection process, including a clear step-by-step description and an accompanying decision tree or flowchart,¹⁰
2. Reconsider its covered conductor approach after correcting the benefit-cost ratio (BCR) calculation to include only incremental Operation and Maintenance (O&M) costs as part of the net benefits,¹¹ and
3. Demonstrate that the application of its selected risk scaling exponent aligns with stakeholder risk preferences and is not arbitrarily applied.^{12,13}

In addition to those in the SPD Report, Cal Advocates recommends:

- A. The Commission require SDG&E, in its TY2028 GRC, to update its risk mitigation analysis of Strategic

⁶ A.25-05-010, *The Public Advocates Office Informal Comments on the Application of Southern California Gas Company and San Diego Gas & Electric Company to Submit their 2025 Risk Assessment and Mitigation Phase Reports* (Cal Advocates' Informal Comments), September 4, 2025.

⁷ Mussey Grade Road Alliance (MGRA), The Utility Reform Network (TURN), and Indicated Shippers submitted Informal Comments on August 22, 2025, September 12, 2025, and September 30, 2025, respectively.

⁸ See SPD Report at 1.

⁹ See generally SPD Report.

¹⁰ SPD Report at 145. SPD's Wildfire and PSPS recommendation #5.

¹¹ SPD Report at 146. SPD's Wildfire and PSPS recommendation #11.

¹² SPD Report at 146. SPD's Wildfire and PSPS recommendation #12.

¹³ SPD Report at 132 states "...SPD's concern that SDG&E's risk scaling is not meaningfully linked to mitigation planning. Instead, the evidence suggests that SDG&E's risk scaling primarily serves to increase CBR values, rather than to guide risk-informed prioritization." However, Cal Advocates generally recommends unscaled risk when calculating BCRs.

Undergrounding (SUG) versus alternatives to include all capital-related costs recovered from ratepayers.

- B. The Commission require SDG&E, in its TY2028 GRC, to correct its SUG and Combined Covered Conductor (CCC) Lifecycle Comparison to include an accurate common reference mileage of overhead miles replaced.
- C. The Commission require SDG&E to file a supplement to its 2025 RAMP to correct the BCR calculation in its CCC analysis and to provide a valid comparison of SUG versus CCC in its TY2028 GRC.

II. COMMENTS

- A. **The Commission should require SDG&E, in its TY2028 GRC, to update its risk mitigation analysis of Strategic Undergrounding versus alternatives to include all capital-related costs recovered from ratepayers.**

The purpose of the utility's RAMP report is to provide information about the utility's assessment of its key safety risks and its proposed programs for mitigating those risks.¹⁴ Pursuant to Public Utilities Code section 451, charges to ratepayers must be found to be just and reasonable.¹⁵ SDG&E has failed to meet this reasonableness standard since they failed to provide complete and accurate ratepayer cost information. SDG&E's comparison between the SUG proposal and the alternative proposals thus lacks a factual foundation. Without complete information, the Commission cannot compare whether the cost to ratepayers relative to the alternative proposals is reasonable. Specifically, SDG&E excludes a complete set of capital-related costs in its comparison. Without this information, SDG&E's analysis is not reasonable since it does not consider the true costs to ratepayers. SDG&E's analysis favors capital-based programs in which a utility may earn a rate of return over the capital program asset's life. Without this data, the Commission does not have the information needed to compare alternative risk mitigation proposals and to determine which programs offer the best cost-benefits for ratepayers making a reasonableness review impossible.

¹⁵ California Public Utilities Code section 451.

The Commission requires utilities to submit alternative risk mitigation proposals.¹⁶ This information is intended to allow the Commission to compare the costs and benefits of risk mitigation program alternatives to the utilities' proposal. In its June 20, 2025 post-filing workshop, SDG&E presented a Mitigation Lifecycle Cost chart (Lifecycle Chart) that purports to compare the lifecycle cost of its CCC program to its SUG program over 55 years.¹⁷ However, the breakdown of the cost comparison between the two mitigations depicted does not represent the true costs of these mitigations to ratepayers. This lack of complete information is contrary to the purpose of the RAMP filing which is to incorporate the risk assessment approach used by each of the energy utilities, as developed in the Safety Model Assessment Proceeding (S-MAP) into the GRC process. This risk assessment approach will provide a transparent process to ensure that the energy utilities are placing the safety of the public, and of their employees, as a top priority in their respective GRC proceedings.¹⁸

The Risk-Based Decision-Making Framework (RDF) Rulemaking¹⁹ specifically states, "For capital programs, the costs in the denominator should include incremental expenses made necessary by the capital investment."²⁰ All capital-related costs recovered through ratepayers must be included in the cost comparison of mitigations for an accurate estimate of what these mitigations would cost ratepayers. Actual costs must include all capital-related costs including annual asset rate of return costs, income taxes

¹⁶ D.18-12-014, *Phase Two Decision Adopting Safety Model Assessment Proceeding (S-Map) Settlement Agreement with Modifications*, December 12, 2018, at 34. "Present two alternative mitigation plans that it considered."

¹⁷ Sempra's Email with Presentation to Service List, Subject: [EXTERNAL]
RE: A.25-05-010/A.25-05-013 SoCalGas/SDG&E 2025 RAMP Notice of Post Filing Webinar, June 19, 2025. See Appendix A/Cal Advocates Informal Comments at 3 (Figure 1)

¹⁸ D.14-12-025, *Decision Incorporating a Risk-Based Decision-Making Framework into the Rate Case Plan and Modifying Appendix A of Decision 07-07-004*, December 9, 2014, at 35-36.

¹⁹ R.20-07-013, *Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities*, July 16, 2020.

²⁰ D.25-08-032, *Phase 4 Decision*, August 28, 2025, at Appendix A Row 25.

on those earnings, asset property taxes, existing asset removal and asset replacement costs, and depreciation, including negative salvage value costs.²¹

In Informal Comments on the Sempra RAMP, Cal Advocates noted that SDG&E fails to consider the full ratepayer cost of these mitigation programs and the lack of these figures makes the Lifecycle Chart incomplete and misleading.^{22,23} In response, SDG&E acknowledged that they do not have indirect lifecycle cost data and they have not done the full analysis of the CCC and SUG alternatives.^{24,25,26} A full analysis, which includes all indirect lifecycle costs, would increase the annual cost recovered from ratepayers.

To accurately compare risk mitigation alternatives and understand the impact that these mitigations would have on customer rates, all capital-related costs recovered through ratepayers must be included in the cost comparison of mitigation alternatives. Without inclusion of these capital-related costs any comparison, including the Lifecycle Chart graphic SDG&E provided, is inaccurate and potentially misleading. The Commission should therefore require SDG&E to update its SUG analysis to include all capital-related costs recovered from ratepayers in its TY2028 GRC application.

²¹ To illustrate: using Return on Equity (ROE) as one example capital-related cost: As a first level approximation: the lifetime accumulated ROE cost to ratepayers over 55 years for a \$2 million installed cost asset would be \$2.864 million greater than the cost of a \$1 million installed cost asset, assuming a 10.23% ROE and straight-line asset depreciation. This one example does not account for other substantial capital-related costs passed onto ratepayers

²² A.25-05-010, *The Public Advocates Office Informal Comments on The Application of Southern California Gas Company and San Diego Gas & Electric Company to Submit Their 2025 Risk Assessment and Mitigation Phase Reports* (Informal Comments), September 4, 2025, at 2-6.

²³ See Appendix A for Cal Advocates' Informal Comments in detail.

²⁴ See Sempra's Response to Data Request Number: *CalAdvocates-Sempra-2025RAMP-AYN-002*, Q.1 and Q.2.

²⁵ See Sempra's Response to Data Request Number: *PAO-SDGE-2025RAMP-Informal DR_001*, Q.4 and Q.5.

²⁶ SDG&E's email response to Cal Advocates: *[EXTERNAL] RE: A.25-05-010 013; Ruling on CA Motion to Compel* -, October 14, 2025.

B. The Commission should require SDG&E, in its TY2028 GRC, to correct its SUG and CCC Lifecycle Comparison to include an accurate common reference mileage of overhead miles replaced.

SDG&E fails to account for the overhead-to-underground mileage conversion in its lifecycle comparison graphic depicted in the Lifecycle Chart. SDG&E assumes that underground mileage is twenty percent longer than the overhead lines to be replaced, and uses an overhead-to-underground mile conversion rate of 1.2 to account for the additional miles necessary to convert overhead to underground.²⁷ However, this amount was not accounted for in its comparison of SUG versus CCC.²⁸ Without incorporating the twenty percent mileage conversion assumption, the lifecycle comparison analysis of its proposed SUG program versus CCC is not based upon mitigating an equivalent mile of overhead lines. This significantly distorts the lifecycle comparison of SUG versus CCC and distorts the BCR computation for mitigation of a mile of overhead line for the SUG proposal. The Commission should require SDG&E to revise its SUG lifecycle analysis to include the overhead-to-underground mileage conversion rate of 1.2 in its lifecycle comparison against CCC in its TY 2028 GRC. As required by D.14-12-025, the RAMP submission can be used in the utility's GRC filing to support its position on the assessment of its safety risks, and its plans to manage, mitigate, and minimize those risks in the context of the utility's upcoming GRC application filing.²⁹

SDG&E should provide a valid comparison of SUG versus CCC in its TY2028 GRC and share all of this data with intervenors during the pendency of SEMPRA's upcoming GRC.

²⁷ SDG&E 2025 RAMP Report at Attachment E.

²⁸ See Figure 1 (Lifecycle Chart) in which SDG&E presents a mitigation lifecycle cost comparison of one mile of CCC and one mile of SUG. While Figure 1 states "Wildfire and Wildfire and PSPS workpapers reflect OH-to-UG conversion factors", SDG&E does not account for how that is incorporated into the Figure 1 cost comparison of SUG and CCC to mitigate a single common mile of Overhead (OH) line when it takes more miles of SUG than CCC to mitigate one mile of OH line.

²⁹ D.14-12-025 at 53, Finding of Fact # 26.

C. The Commission should require SDG&E to file a supplement to its 2025 RAMP to correct the BCR calculation in its CCC analysis and to provide a valid comparison of SUG versus CCC in its TY2028 GRC.

SPD found that SDG&E has included only the costs of existing O&M baseline activities in its analysis of CCC, rather than just the incremental costs or savings expected from the mitigation.³⁰ This is contrary to the RDF as seen in D.25-08-032 which specifically states “For capital programs, the costs in the denominator should include incremental expenses made necessary by the capital investment.”³¹

Cal Advocates agrees with SPD that inclusion of O&M costs already incurred by ratepayers in establishing the baseline level of risk is not appropriate since these costs will continue to be paid in a non-build scenario.^{32,33} The Commission should require SDG&E to file a supplement to its 2025 RAMP to correct the BCR calculation in its CCC analysis to include incremental costs and benefits and then reconsider the CCC alternative. Similarly, SDG&E should be directed to provide a valid comparison of SUG versus CCC in its TY2028 GRC.

III. CONCLUSION

For the reasons stated herein, Cal Advocates recommends that the Commission require SDG&E to update its SUG analysis to include all capital-related costs recovered from ratepayers in its TY2028 GRC application. SEMPRA must provide, as a supplement to its 2025 RAMP Report and in its TY2028 GRC, an update to its

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³⁰ SPD Report at 132.

³¹ D.25-08-032, *Phase 4 Decision*, August 28, 2025, at Appendix A Row 25. Bolding added.

³² SPD Report at 132.

³³ SDG&E’s approach significantly decreases the BCR for CCC compared to SUG because it assigns pre-existing costs of existing O&M activity (such as vegetation management and overhead inspection patrols, rather than the incremental O&M costs associated with CCC), then only accounts for the incremental cost reductions in the case of SUG. SDG&E’s methodology skews the BCRs to heavily favor SUG.

SUG/CCC comparison analysis. This supplement should include the twenty percent overhead-to-underground mileage conversion in its lifecycle comparison against CCC, and the correct BCR calculations of its SUG and CCC analyses.

Respectfully submitted,

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APPENDIX A

INFORMAL COMMENTS:

**THE PUBLIC ADVOCATES OFFICE INFORMAL COMMENTS ON THE
APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY AND
SAN DIEGO GAS & ELECTRIC COMPANY TO SUBMIT THEIR 2025
RISK ASSESSMENT AND MITIGATION PHASE REPORTS**

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September 4, 2025

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I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby submits these informal comments on Southern California Gas Company's (SoCalGas) Application (A.) 25-05-010¹ and San Diego Gas & Electric Company's (SDG&E) A.25-05-013,² (collectively Sempra),³ regarding their 2025 Risk Assessment and Mitigation Phase (RAMP) Reports (Sempra's RAMP Report). These comments identify significant shortcomings stemming from Sempra's failure to include all capital related costs in its cost comparison of wildfire mitigation alternatives in its RAMP Report (detailed in Section II of these comments).

Cal Advocates recommends that the Safety Policy Division (SPD) require Sempra to supplement its RAMP Report and include any related capital costs that may be passed

¹ A.25-05-010, *Application of Southern California Gas Company (U 904 G) to Submit its 2025 Risk Assessment and Mitigation Phase Report* (SoCalGas 2025 RAMP Application), May 15, 2025.

² A.25-05-013, *Application of San Diego Gas & Electric Company (U 902 M) to Submit its 2025 Risk Assessment and Mitigation Phase Report* (SDG&E 2025 RAMP Application), May 15, 2025.

³ Sempra is a public utilities holding company and its operating companies include SoCalGas and SDG&E.

on to ratepayers, including those in Sempra's Mitigation Lifecycle Cost chart.⁴

II. COMMENTS

A. **The Safety Policy Division should require Sempra to include all capital related costs to ratepayers in its cost comparisons between mitigation programs.**

1. **Sempra neglects to consider the full ratepayer cost in its cost comparison between mitigation programs.**

In its June 20, 2025 post-filing workshop, Sempra presented a Mitigation Lifecycle Cost chart that compares the lifecycle cost⁵ of its Combined Covered Conductor program to its Strategic Undergrounding program over 55 years (shown in Figure 1, below).⁶ Cal Advocates has attempted through data requests, and several Meet-and-Confers with Sempra, to get a complete disclosure of the cost comparison depicted in the chart. Sempra has refused to cooperate with these efforts and refused to identify capital costs that could be passed on to ratepayers. These costs include costs related to rate of return, taxes, asset retirement costs, and depreciation costs (including negative salvage value), among others.

⁴ Sempra's Mitigation Lifecycle Cost chart produced by Sempra at the June 20, 2025 workshop.

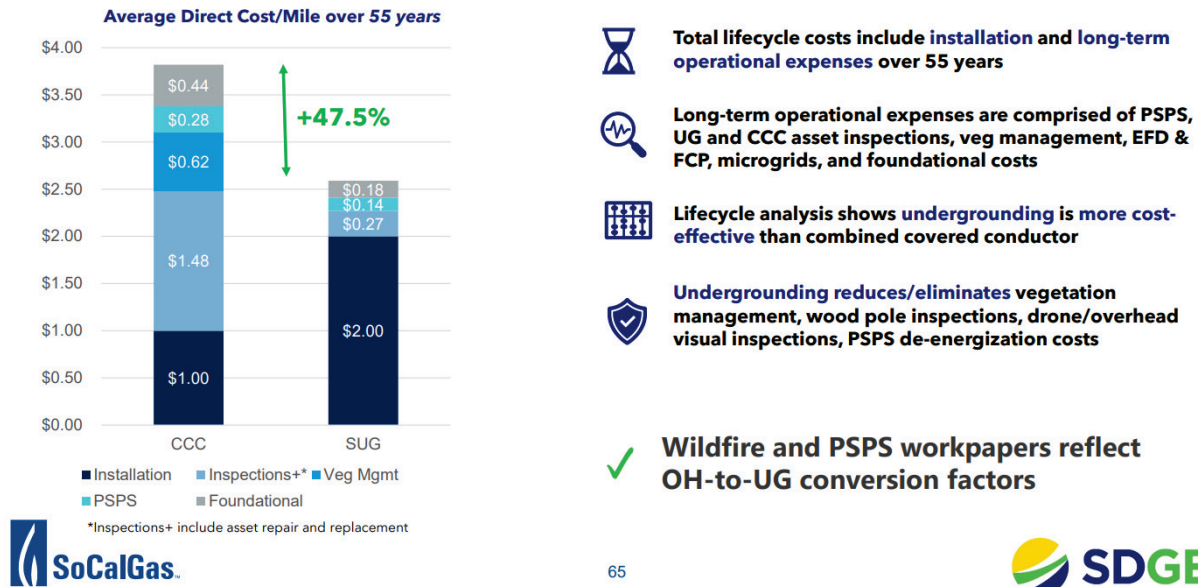
⁵ Every business decision involves a trade-off between costs and benefits. However, not all costs and benefits are obvious or immediate. Some may occur over a long period of time, or depend on uncertain factors such as inflation, maintenance, energy prices, or environmental impacts. To account for these complexities, businesses need a systematic and comprehensive method of evaluating the economic implications of their choices. This method is called Life Cycle Cost Analysis (LCCA).

LCCA is a technique that estimates the total costs of owning, operating, and maintaining a product, system, or project over its useful life. It also compares these costs with the expected benefits, such as revenues, savings, or performance improvements. By doing so, LCCA helps businesses identify the most cost-effective option among competing alternatives, or determine whether a proposed investment is worthwhile. (Life Cycle Cost Analysis: Investing Wisely: Using LCCA to Evaluate Business Decisions (April 4, 2025) Accessed at: <https://fastercapital.com/content/Life-Cycle-Cost-Analysis--Investing-Wisely--Using-LCCA-to-Evaluate-Business-Decisions.html>).

⁶ Sempra's Email with Presentation to Service List, Subject: *[EXTERNAL] RE: A.25-05-010/A.25-05-013 SoCalGas/SDG&E 2025 RAMP Notice of Post Filing Webinar*, June 19, 2025.

Figure 1 (From Sempra's June 20, 2025 RAMP Workshop):

Mitigation Lifecycle Cost



Cal Advocates supports utility analysis and disclosure of lifecycle costs and benefits to compare risk mitigation alternatives in RAMPs. However, such comparisons must be complete and include all capital related costs to ratepayers and accurately represent and estimate complete capital and expense costs of these alternatives. In the above chart, Sempra only accounts for the average installation and long-term operational expenses, the chart fails to consider the full ratepayer cost of these mitigation programs.⁷ ⁸ Sempra's analysis thereby gives the impression that Strategic Undergrounding should be selected over Combined Covered Conductor, with Strategic Undergrounding seeming to cost 47.5% less than Combined Covered Conductor over 55 years. Sempra, by not including all related capital costs in its analysis, calls into question its conclusion that

⁷ See Sempra's Response to Data Request Number: *CalAdvocates-Sempra-2025RAMP-AYN-001* (PDR_P1766).

⁸ See Sempra's Response to Data Request Number: *CalAdvocates-Sempra-2025RAMP-AYN-002* (PDR_P1837).

² See Sempra's Response to Data Request Number: *PAO-SDGE-2025RAMP-Informal DR_001* (PDR_1422).

Strategic Undergrounding is more cost effective than Combined Covered Conductor. A full analysis which includes all related capital costs very well could increase the annual cost recovered from ratepayers.¹⁰

For almost a decade now, the Commission has required utilities to identify two alternative risk mitigations that were considered for each RAMP proposal.^{11,12} The comparison of the costs and benefits of different risk mitigations and alternatives is a key element of the RAMP process; it allows the Commission and parties to see differences in costs and benefits, and why the utility views the alternatives as inferior to the proposed mitigation.¹³ In order to reasonably evaluate the costs and benefits of alternatives, and to understand the impact that these mitigations would have on customer rates, the Commission and parties must know the full costs of mitigations by including those capital related costs to ratepayers. SPD should therefore require Sempra to update its analysis of risk mitigation alternatives to include all capital related costs recovered from ratepayers for capital projects (as seen in the attached response to the Data Request Cal Advocates propounded on Sempra on June 25, 2025).¹⁴ Moving forward, SPD should also require all utilities, in their comparison of alternatives, to include all capital related costs paid for by ratepayers.

¹⁰ Rate of return costs, income taxes on earnings, asset property taxes, existing asset removal and asset replacement costs, and depreciation, including negative salvage value costs.

¹¹ D.14-12-025, *Decision Incorporating a Risk-Based Decision-Making Framework into the Rate Case Plan and Modifying Appendix A of Decision 07-07-004*, December 9, 2014, at 32 and 37-38. (“The Refined Straw Proposal recommends that the utility’s RAMP report contain at least the following...For comparison purposes, at least two other alternative mitigation plans the utility considered and an explanation of why the utility views these plans as inferior to the proposal plan... We adopt the following RAMP process...The utility’s RAMP submission shall contain the information that the Refined Straw Proposal has described, as summarized above.”).

¹² D.18-12-014, *Phase Two Decision Adopting Safety Model Assessment Proceeding (S-Map) Settlement Agreement with Modifications*, December 20, 2018, at 34.

¹³ D.14-12-025 at 32. (“The Refined Straw Proposal recommends that the utility’s RAMP report contain at least the following:...For comparison purposes, at least two other alternative mitigation plans the utility considered and an explanation of why the utility views these plans as inferior to the proposal plan.”)

¹⁴ Appendices A, B, and C.

2. The Safety Policy Division should ensure that Sempra provides full disclosure of capital related costs as part of Sempra’s comparison of mitigation alternatives.

As provided for in the Scoping Ruling in this proceeding, all relevant lifecycle costs and benefits must be accurately integrated into the Cost-Benefit Ratio calculations when assessing risk mitigation programs and projects. Indeed, the Scoping Ruling scheduled a subsequent workshop, to explore these Mitigation Lifecycle costs, including related capital costs.^{15,16}

Additionally, the Scoping Ruling points to compliance with the directives of Decisions (D.) 22-12-027¹⁷ and D.24-05-064.^{18,19} These decisions contain the Risk Based Decision Making Framework (RDF) as seen in each Decision’s Appendix A,²⁰ in which Row 25 of the RDF states:

The Cost-Benefit Ratio calculation should be calculated by dividing the dollar value of Mitigation Benefit by the Mitigation cost estimate. The values in the numerator and denominator should be present values to ensure the use of comparable measurements of Benefits and costs. The Benefits should reflect the full set of Benefits that are the results of the incurred costs. For capital programs, the costs in the denominator should include incremental expenses made necessary by the capital investment.²¹

¹⁵ A.25-05-010/013, *Assigned Commissioner’s Scoping Memo and Ruling* (Scoping Ruling), August 11, 2025, at 5.

¹⁶ As in the first workshop, this requested data was not disclosed by Sempra. It should be noted that other intervenors also requested a discussion of these issues.

¹⁷ D.22-12-027, *Phase II Decision Adopting Modifications to The Risk-Based Decision-Making Framework Adopted in Decision 18-12-014 And Directing Environmental and Social Justice Pilots*, December 21, 2022.

¹⁸ D.24-05-064, *Phase 3 Decision*, June 6, 2024.

¹⁹ Scoping Ruling Issue #3f at 3. (“Whether SoCalGas and SDG&E ensured that all relevant lifecycle costs and benefits are comprehensively identified, accurately integrated into the Cost Benefit Ratio calculations, adequately demonstrated when assessing risk mitigation programs and projects, and implemented in compliance with the directives of D.22-12-027 and D.24-05-064.”)

²⁰ D.22-12-027 and D.24-05-064 (R.20-07-013, Risk Based Decision Making Framework (Appendix A) Mitigation Analysis for Risks in RAMP - #25, 26 at A-15-A-16.

²¹ D.24-05-064 at Appendix A Row 25.

Both D.22-12-027 and D.24-05-064 and its Attachment A, outlines the RDF's cost-benefit analysis which provides for the evaluation of capital program costs made necessary by the capital investment.²² Row 25 of the RDF requires the full set of benefits of a mitigation to be used to calculate the Cost-Benefit Ratio.²³ Therefore, the full set of costs of a mitigation, including all capital related costs to customers, must also be used in the Cost-Benefit Ratio calculation to fully assess the costs and benefits of a mitigation. SPD should therefore require SEMPRA to include all capital costs incurred by ratepayers including but not limited to rate of return costs, income taxes on earnings, asset property taxes, asset retirement costs, and depreciation costs (including negative salvage value costs).

3. It should not take Sempra months to provide capital costs estimates.

As noted above, through data requests, Cal Advocates and others have sought to obtain the full costs of Combined Covered Conductor and Strategic Undergrounding, including costs recovered from ratepayers. In response to these efforts, Sempra has argued: 1) that costs related to revenue requirement calculations are not required in the RAMP (by the RDF and Rulemaking (R.) 20-07-013), and 2) that the General Rate Case is the appropriate venue to indicate those costs.²⁴

However, requirements related to RAMP filings and the right of any party to a proceeding to engage in discovery are intertwined matters.

The objective of RAMP is to incorporate the risk assessment approach used by each of the energy utilities, as developed in the S-MAP into the GRC process.²⁵ As a

²² D.22-12-027 and D.24-05-064 (R.20-07-013, Risk Based Decision Making Framework (Appendix A) Mitigation Analysis for Risks in RAMP - #25, 26 at A-15-A-16.

²³ D.24-05-064 at Appendix A Row 25.

²⁴ Sempra Prehearing Conference Transcript, July 23, 2025, at 25. Accessed at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M574/K954/574954449.PDF>

²⁵ D.14-12-025 at 35-36.

matter of law, Rule 10.1, Public Utilities Code sections 309.5(e) and 314 allows discovery of this data by Cal Advocates in the RAMP proceeding.

Rule 10.1 states, “Without limitation to the rights of the Commission or its staff under Pub. Util. Code Sections 309.5 and 314, any party may obtain discovery from any other party regarding any matter, not privileged, that is relevant to the subject matter involved in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence, unless the burden, expense, or intrusiveness of that discovery clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.”²⁶

In this matter, the lifecycle costs associated with a comparison between Combined Covered Conductor and Strategic Undergrounding are relevant since any cost benefit analysis, as required in the RAMP, should include related capital costs to fully evaluate the effectiveness of the compared mitigations. Furthermore, a complete and full analysis of the Mitigation Lifecycle Cost chart was made relevant and potentially admissible as evidence by Sempra who introduced the chart for discussion at the June 20, 2025 workshop and in this RAMP proceeding.

Sempra has also objected to Cal Advocates’ request on claims that the variability of the indirect expenses as requested in Cal Advocates Data Requests (depreciation, property taxes, income taxes, etc.) is not available and will take months to complete. By refining its original request and asking for only estimates, Cal Advocates attempted to address Sempra’s claim of burden in producing the requested capital cost data, even though any capital project would naturally include this information.²⁷ Sempra refused to provide these basic estimates.

It should be noted that Pacific Gas and Electric Company’s (PG&E) 2024 RAMP showed that calculating cost estimates and averages relating to revenue requirement

²⁶ Commission’s Rules of Practice and Procedure Rule 10.1. Also see California Evidence Code section 210 (Western States Petroleum Assn. v. Superior Court (1995), 9 C4th 559).

²⁷ Sempra’s Email to Cal Advocates: Subject: *[EXTERNAL]* RE: RE: RE: RE: *New Time Proposed: Meeting between Cal Advocates and SDG&E*, July 28, 2025.

requires neither an extended time to calculate, nor a Results of Operation (RO) model to estimate.²⁸ PG&E's 2024 RAMP Report includes a tool (Charge) to calculate category estimates and averages based on a set of assumptions, including Present Value Revenue Requirement (PVRR) multipliers, Rate Base, Return and Taxes, and Revenue Requirement.²⁹ Additionally, PG&E's Charge Tool accounts for Negative Salvage Values when used to estimate PVRR multipliers that are applied to the cost forecast of capital projects.³⁰ PG&E's Charge Tool is an Excel workbook that computes revenue requirements for a single capital investment.³¹ As such, PG&E's RAMP demonstrates that a utility does not need to run an RO model to provide the requested cost estimates.

SPD should direct Sempra to supplement its RAMP to include costs to ratepayers in its cost comparison between mitigation programs and alternatives. SPD should also direct Sempra to ensure that any cost comparison between alternative wildfire risk mitigation alternatives incorporate conversion factors to represent an equivalent number of overhead mileages hardening.³²

III. CONCLUSION

For the reasons stated herein, Cal Advocates recommends that SPD require Sempra to supplement its RAMP Report with an update to its analysis of mitigation alternatives to include all capital related costs recovered from ratepayers for capital projects, and to require all utilities, in their comparison of alternatives in subsequent

²⁸ A.24-05-008, *Application of Pacific Gas and Electric Company (U39m) To Submit Its 2024 Risk Assessment and Mitigation Phase (RAMP) Report* (PG&E 2024 RAMP Report), May 15, 2024, at attachment *RM-RMCBR-13 PVRR_Charge2020run.xlsx*.

²⁹ PG&E 2024 RAMP Report at attachment *RM-RMCBR-13 PVRR_Charge2020run.xlsx*. PGE's Charge is an Excel workbook that computes revenue requirements for a single capital investment subject to cost-of-service ratemaking. PG&E's Charge method assumes a capital investment of 100 so that the computed amounts can be treated as a percentage of the original investment. Charge can also compute short-term earnings and earnings per share in dollars.

³⁰ PG&E 2024 RAMP Report at 2-64 to 2-65.

³¹ PG&E 2024 RAMP Report at Attachment *RM-RMCBR-13 PVRR_Charge2020run.xlsx*.

³² For example, if it takes 1.2 miles of undergrounding to mitigate 1 mile of overhead line, while it would take 1.0 miles of covered conductor to mitigate 1 mile of overhead line, that difference must be incorporated into any meaningful cost comparison of wildfire mitigation alternatives.

RAMP filings, to include all capital related costs paid for by ratepayers. Cal Advocates also requests that SPD considers Cal Advocates' concerns in its report on Sempra's RAMP Report, as described herein.

Respectfully submitted,

/s/ RODERICK D. HILL
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September 4, 2025

APPENDIX A

DATA REQUEST:

CALADVOCATES-SEMPRA-2025RAMP-AYN-001 (PDR_P1766)

Data Request Number: CalAdvocates-Sempra-2025RAMP-AYN-001

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 6/4/2025

Date Responded: 6/18/2025

GENERAL OBJECTIONS

1. SDG&E objects generally to each request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. No information protected by such privileges will be knowingly disclosed.
2. SDG&E objects generally to each request that is overly broad and unduly burdensome. As part of this objection, SDG&E objects to discovery requests that seek “all documents” or “each and every document” and similarly worded requests on the grounds that such requests are unreasonably cumulative and duplicative, fail to identify with specificity the information or material sought, and create an unreasonable burden compared to the likelihood of such requests leading to the discovery of admissible evidence. Notwithstanding this objection, SDG&E will produce all relevant, non-privileged information not otherwise objected to that it is able to locate after reasonable inquiry.
3. SDG&E objects generally to each request to the extent that the request is vague, unintelligible, or fails to identify with sufficient particularity the information or documents requested and, thus, is not susceptible to response at this time.
4. SDG&E objects generally to each request that: (1) asks for a legal conclusion to be drawn or legal research to be conducted on the grounds that such requests are not designed to elicit facts and, thus, violate the principles underlying discovery; (2) requires SDG&E to do legal research or perform additional analyses to respond to the request; or (3) seeks access to counsel’s legal research, analyses or theories.
5. SDG&E objects generally to each request to the extent it seeks information or documents that are not reasonably calculated to lead to the discovery of admissible evidence.
6. SDG&E objects generally to each request to the extent that it is unreasonably duplicative or cumulative of other requests.
7. SDG&E objects generally to each request to the extent that it would require SDG&E to search its files for matters of public record such as filings, testimony, transcripts, decisions, orders, reports or other information, whether available in the public domain or through FERC or CPUC sources.
8. SDG&E objects generally to each request to the extent that it seeks information or documents that are not in the possession, custody or control of SDG&E.

Data Request Number: CalAdvocates-Sempra-2025RAMP-AYN-001

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9. SDG&E objects generally to each request to the extent that the request would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

10. SDG&E objects generally to each request that calls for information that contains trade secrets, is privileged or otherwise entitled to confidential protection by reference to statutory protection. SDG&E objects to providing such information absent an appropriate protective order.

II. EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.

2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.

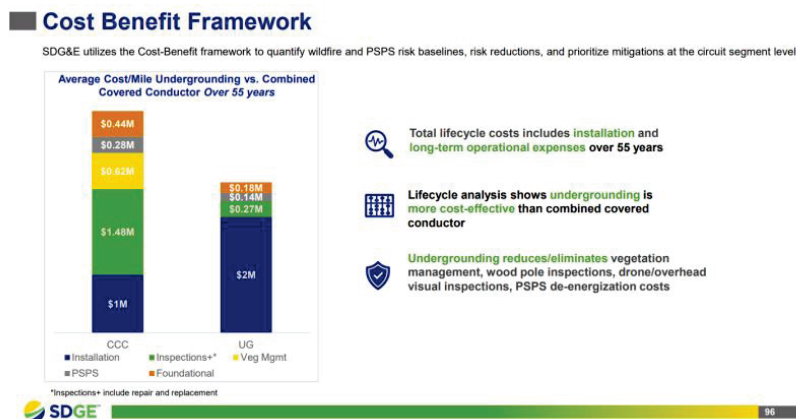
3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.

4. These responses are made solely for the purpose of this proceeding and for no other purpose.

Question 1

The Office of Energy Infrastructure Safety (OEIS) held a 2026-2028 Base Wildfire Mitigation Plans (WMPs) Public Workshop for Pacific Gas and Electric Company, Bear Valley Electric Services, San Diego Gas & Electric Company, and Southern California Edison WMPs on May 21, 2025. During SDG&E's presentation, SDG&E shared the Cost Benefit Framework at slide 96 as shown in Figure 1, which compares the lifecycle cost of Combined Covered Conductor (CCC) and Undergrounding (UG).¹

FIGURE 1: COST BENEFIT FRAMEWORK



a. Please provide a detailed breakdown for these costs. This should include, but not be limited to, a breakdown and explanation for all:

- Expense costs
- Capital costs.
- Depreciation costs.
- Lifecycle costs.
- Asset removal costs.
- Negative salvage value and negative salvage value depreciation costs.
- Permitting costs.
- Maintenance costs.
- Operation costs.
- Rate of return and debt costs to ratepayers.

¹ This slide is numbered slide 96 available as part of the Office of Energy Infrastructure Safety May 21, 2025 Workshop: "First WMP Stakeholder Workshop Recording and Slides" accessed at <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58555&shareable=true>

xi. Other costs not included above.

SDG&E Response 1a:

- i. **Expense costs** – These costs represent the one-time operations and maintenance expenses incurred during the installation phase. These costs are not included; however, they are relatively minor compared to other cost components and may not be prominently reflected in the graphical representation. SDG&E intends to incorporate these operational costs in the next iteration of the lifecycle costs analysis. Notably, these costs were accounted for in the RAMP cost-benefit calculation workpapers.
- ii. **Capital costs** – See Installation Costs in the SUG and CCC Breakdown Table below.
- iii. **Depreciation costs** – SDG&E has provided the direct costs associated with the installation and maintenance of CCC and SUG. These differ from other capital-related costs—such as depreciation, taxes, and the rate of return—which comprise the revenue requirement used to determine customer rates. These costs are not included.
- iv. **Lifecycle costs** – Lifecycle costs, including both installation and long-term operational expenses, are associated with covered conductor installations and undergrounding of electric lines. See SUG and CCC Breakdown Table Below.
 - Long Term Operational Expenses for CCC comprise PSPS costs, Overhead Asset Inspections, Veg Management, EFD&FCP and Microgrids.
 - Long Term Operational Expenses for SUG comprise reduced PSPS, Underground Asset Inspections, and Microgrid.
- v. **Asset removal costs** – When an existing asset is replaced, the process typically involves both the removal of the old asset and the installation of the new one. The costs associated with removing the existing assets are considered part of the overall Installation Costs for the replacement activity. These removal costs are captured and reported accordingly, as shown in the SUG and CCC Breakdown Table below.
- vi. **Negative salvage value and negative salvage value depreciation costs** - SDG&E has provided the direct costs associated with the installation and maintenance of CCC and SUG. These differ from capital-related costs—such as depreciation, taxes, and the rate of return—which comprise the revenue requirement used to determine customer rates. These costs are not included.
- vii. **Permitting costs** - These costs are included in the installation costs for UG and CCC.

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SDG&E Response 1a-Continued:

- viii. **Maintenance costs** - See SUG and CCC Breakdown Table below.
- ix. **Operation costs** - See SUG and CCC Breakdown Table below.
- x. **Rate of return and debt costs to ratepayers.** SDG&E has provided the direct capital costs associated with the installation, maintenance and operation cost of CCC and SUG. These differ from capital-related costs—such as depreciation, taxes, and the rate of return—which comprise the revenue requirement used to determine customer rates. These costs are not included. The lifecycle cost model is used to compare the overall costs (i.e., installation and maintenance) of CCC and UG mitigations over the lifetime of the asset to determine its long-term cost effectiveness.
- xi. **Other costs not included above:** None

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SUG Breakdown Table:

Question 1.a.	Bar Chart Category	Breakdown	Average Cost per mile (55 years)		
ii. Capital Costs (Direct) + Includes Asset Removal and Permitting Costs	Installation - UG	Civil	\$1,004,526		
		Electrical	\$111,436		
		Material	\$126,937		
		Design	\$388,052		
		Project Support	\$281,724		
		Other/Uncategorized	\$17,853		
		Total	\$1,930,528		
Total Capital			\$1,930,528		
viii. Maintenance	Inspections+	SS10 Inspection	\$15,083		
		AGI/E Inspection	\$8,510		
		Repair and Replacement Capital	\$242,880		
		Repair and Replacement O&M	\$4,400		
		Total	\$270,873		
		Other Maintenance	Not included	Microgrid maintenance	\$-
				Total Maintenance	
ix. Operation	PSPS	Activation	\$7,923		
		Community Cust Outreach	\$131,578		
	Foundational	O&M Cost	\$124,850		
		Capital Cost	\$58,685		
	Total		\$323,037		
Total Operation Costs			\$323,037		
i. Expense costs	Not included		\$-		
iii. Depreciation costs.	Not included		\$-		
vi. Negative salvage value and negative salvage value depreciation costs.	Not included		\$-		
x. Rate of return and debt costs to ratepayers.	Not included		\$-		
iv. Total Lifecycle Costs			\$2,524,437		

CCC Breakdown Table:

Question 1.a.	Bar Chart Category	Breakdown	Average Cost per mile (55 years)
ii. Capital Costs (Direct) + Includes Asset Removal and Permitting Costs	Installation - CC	Labor (Internal)	\$258,000
		Materials	\$189,000
		Contractor	\$240,000
		Overhead (division, corporate, etc.)	\$350,000
		Total	\$1,037,000
Other Capital	Not included	EFD installation (one time)	\$454
Total Capital			\$1,037,454
viii. Maintenance costs.	Inspections+	Detailed Inspection	\$4,472
		Patrol Inspection	\$8,568
		Wood Pole Intrusive Inspection	\$6,504
		Drone Inspection	\$20,479
		Replacement Capital	\$272,075
		Repair Capital	\$549,282
		Repair and Replacement O&M	\$617,888
		Total	\$1,479,269
Other Maintenance	Not included	FCP maintenance	\$2,279
	Not included	Microgrid maintenance	\$-
Total Maintenance			\$1,481,548
ix. Operation costs.	Vegetation Management	Tree Inspections	\$67,471
		Tree trim/removal	\$406,325
		Tree Inspection Audit	\$20,616
		Pole Inspection	\$3,566
		Pole Veg Clearing	\$39,885
		Pole Inspection Audit	\$3,170
		Fuel Management	\$78,522
	PSPS	Activation	\$18,175
		Community Cust Outreach	\$263,125
	Foundational	O&M Cost	\$354,090
		Capital Cost	\$87,505

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Total Operation Costs		\$1,342,449
I. Expense costs	Not included	\$-
iii. Depreciation costs.	Not included	\$-
vi. Negative salvage value and negative salvage value depreciation costs.	Not included	\$-
x. Rate of return and debt costs to ratepayers.	Not included	\$-
iv. Total Lifecycle Costs		\$3,861,451

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Question 1

The Office of Energy Infrastructure Safety (OEIS) held a 2026-2028 Base Wildfire Mitigation Plans (WMPs) Public Workshop for Pacific Gas and Electric Company, Bear Valley Electric Services, San Diego Gas & Electric Company, and Southern California Edison WMPs on May 21, 2025. During SDG&E's presentation, SDG&E shared the Cost Benefit Framework at slide 96 as shown in Figure 1, which compares the lifecycle cost of Combined Covered Conductor (CCC) and Undergrounding (UG).²

b. Please provide an explanation and breakdown for all costs associated with CCC wildfire mitigation not included in Figure 1.

SDG&E Response 1b:

For CCC, Protective Equipment and Device (PEDs) are included in RAMP filing, but are not shown in the slide (Figure 1) used in the WMP workshop. The following shows the average cost per mile in 55 years for all HFTD segments. However, these values are too small compared to other costs and they cannot be seen in the bar chart.

EFD installation cost per mile one time in 55 years = \$453.89

FCP maintenance cost per mile in 55 years = \$2,279.22

² This slide is numbered slide 96 available as part of the Office of Energy Infrastructure Safety May 21, 2025 Workshop: "First WMP Stakeholder Workshop Recording and Slides" accessed at <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58555&shareable=true>

Data Request Number: CalAdvocates-Sempra-2025RAMP-AYN-001

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 6/4/2025

Date Responded: 6/18/2025

Question 1

The Office of Energy Infrastructure Safety (OEIS) held a 2026-2028 Base Wildfire Mitigation Plans (WMPs) Public Workshop for Pacific Gas and Electric Company, Bear Valley Electric Services, San Diego Gas & Electric Company, and Southern California Edison WMPs on May 21, 2025. During SDG&E's presentation, SDG&E shared the Cost Benefit Framework at slide 96 as shown in Figure 1, which compares the lifecycle cost of Combined Covered Conductor (CCC) and Undergrounding (UG).³

c. Please provide an explanation and breakdown for all costs associated with UG wildfire mitigation not included in Figure 1.

SDG&E Response 1c:

For Undergrounding, microgrid cost is included in the RAMP filing for specific locations where microgrid exists, but it is not shown in the slide (Figure 1) used in the WMP workshop since the average cost per mile are calculated based on segments in the HFTD only, and there are no microgrids associated with these segments.

³ This slide is numbered slide 96 available as part of the Office of Energy Infrastructure Safety May 21, 2025 Workshop: "First WMP Stakeholder Workshop Recording and Slides" accessed at <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58555&shareable=true>

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Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

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Question 2

Explain how SDG&E evaluated and factored ongoing wildfire risks and costs due to the delays in implementing UG compared to CCC, considering the extended time to implement UG compared to CCC.

SDG&E Response 2:

SDG&E evaluated the ongoing wildfire risks and associated costs stemming from delays in implementing Strategic Undergrounding (UG) compared to Combined Covered Conductor (CCC) installations by recognizing that both solutions, while highly effective, require extended timelines, typically 24 to 36 months for UG and 20 to 35 months for CCC, with full implementation of the all projects in the combined covered conductor and undergrounding portfolio expected to take about 10 years. To manage wildfire and PSPS risks during this period, SDG&E deployed interim operational mitigations such as PSPS de-energizations, backup battery programs, equipment inspections, and advanced protection systems, etc. These measures are assessed and prioritized by cross-functional teams and supported by annual efficacy studies conducted by the Risk Analytics team, ensuring that mitigation strategies remain effective and adaptive throughout the implementation of long-term grid hardening projects.

Question 3

Provide a breakdown for how SDG&E determined a reference mile comparison considering that mitigation of an overhead mile of line requires a different length for CCC or UG wildfire mitigation.

SDG&E Response 3:

Combined Covered Conductor (CCC) mitigation initiative does not typically involve re-routing existing overhead miles. Therefore, a 1:1 ratio of existing overhead miles to installation miles of CCC is used to estimate the number of miles of CCC.

For Strategic Undergrounding, routing, feasibility, and permitting constraints may require the length of the underground to vary from the that of the existing overhead. To account for this, historical work scope data was leveraged that includes the length of removal of existing overhead miles and the length of installation of associated undergrounding cable. A 1:1.2 ratio was observed on average across historical records. Thereby, a factor of 1.2 is multiplied by the existing overhead mile length to get a rough estimate of the length of the underground cable to replace the associated overhead system. The expected underground mileage necessary to complete the overhead to underground conversion is refined during the scoping phase. If the length of undergrounding exceeds the 1.2 threshold, the Strategic Undergrounding Program will re-evaluate the cost effectiveness of the project.

See table below for an example depiction of the unit miles and the estimated SUG and CCC miles for a single circuit-segment.

Circuit-Segment	Units (OH Service Drop miles)	Units (OH Secondary miles)	Units (OH Primary miles)	Units (OH Primary + Secondary miles + Service Drop)	Estimated SUG miles (Miles + OH to UG Conversion)	Estimated CCC miles
Segment A	0.1	2	7	9.1	10.92	9.1

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Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 6/4/2025

Date Responded: 6/18/2025

Question 4

- a. Please provide a breakdown for how SDG&E calculated the number of miles of CCC to replace one mile of overhead line.
- b. Please provide a breakdown for how SDG&E calculated the number of miles of UG to replace one mile of overhead line.
- c. Please provide a breakdown for how SDG&E calculated CCC and UG mitigation lengths and costs considering the mix of primary lines, secondary lines, service lines, and other types of line.
- d. Please provide a breakdown for how SDG&E factored in the above calculations when comparing CCC with UG.

SDG&E Response 4:

- a. Please see response to Q3.
- b. Please see response to Q3.
- c. Estimation of projected line length mileages across different line types, such as primary, secondary, and service lines, follow the same logic, regardless of line types. For further details on estimation calculations of overhead mileage for CCC and UG, please see response to Q3. The cost of installation of CCC and UG is estimated based on using the most up-to-date historical cost-per-mile rates for each initiative. The cost-per-mile rates are applied to the estimated mitigation miles for all line types for a given segment, to estimate the capital construction cost associated with that initiative. Additional maintenance cost, including O&M, lifecycle, and foundational cost estimates are calculated similarly using cost-per-mile rates for each, applied to the projected line length mileages.
- d. The mileage estimation and cost calculation process described in Question 3 and Question 4c informs the total cost estimates for each segment for a given initiative. The cost is then used as a factor in the calculation of the Cost-Benefit Ratio (CBR) metric to estimate and compare cost-effectiveness between CCC and UG. For a look at the calculation of the Cost-Benefit Ratio metric for CCC and UG, please see the tab '8.SUG_vs_CCC_2028-2031' in the file "SDGE_Wildfire&PSPS_Call_Details_Aversion.xlsx available on the SoCalGas/SDG&E Discovery Portal at <https://sempra.sharepoint.com/sites/proceedingdiscovery>.

Data Request Number: CalAdvocates-Sempra-2025RAMP-AYN-001

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 6/4/2025

Date Responded: 6/18/2025

Question 5

Where in SDG&E's RAMP report and workpapers does SDG&E provide a full quantitative breakdown and comparison of the lifecycle cost for UG and UG alternatives?

SDG&E Response 5:

Please see the "SUG&CCC_Lifecycle_cost" tab in both the "SDGE_Wildfire&PSPS_Calc_Details_Aversion" and "SDGE_Wildfire&PSPS_Calc_Details_NoAversion" files, available on the SoCalGas/SDG&E Discovery Portal at <https://sempra.sharepoint.com/sites/proceedingdiscovery>.

Data Request Number: CalAdvocates-Sempra-2025RAMP-AYN-001

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 6/4/2025

Date Responded: 6/18/2025

Question 6

Where in SDG&E's RAMP report and workpapers does SDG&E provide a full quantitative breakdown of comparison the ratepayer benefits for UG and UG alternatives?

SDG&E Response 6:

Please see the file "SDGE_Wildfire&PSPS_Calc_Details_Aversion" available on the SoCalGas/SDG&E Discovery Portal at <https://sempra.sharepoint.com/sites/proceedingdiscovery> for cost benefit calculations. This should not be considered fully quantitative and are limited to and in compliance with RDF guidelines.

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Date Received: 6/4/2025

Date Responded: 6/18/2025

Question 7

Where in SDG&E's 2026-2028 WMPs does SDG&E provide a full quantitative breakdown and comparison of the lifecycle costs for UG and UG alternatives.

SDG&E Response 7:

No, SDG&E's 2026-2028 WMP does not provide a full quantitative breakdown and comparison of lifecycle costs for UG and UG alternatives.

Data Request Number: CalAdvocates-Sempra-2025RAMP-AYN-001

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 6/4/2025

Date Responded: 6/18/2025

Question 8

Where in SDG&E's 2026-2028 WMPs does SDG&E provide a full quantitative breakdown and comparison of the ratepayer benefits for UG and UG alternatives.

SDG&E Response 8:

No, SDG&E's 2026-2028 WMP does not provide a full quantitative breakdown and comparison of the ratepayer benefits for UG and UG alternatives.

APPENDIX B

DATA REQUEST:
CALADVOCATES-SEMPRA-2025RAMP-AYN-002 (1837)

Data Request Number: CalAdvocates-Sempra-2025RAMP-AYN-002

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 06/25/25

Date Responded:07/10/2025

GENERAL OBJECTIONS

1. SDG&E objects generally to each request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. No information protected by such privileges will be knowingly disclosed.
2. SDG&E objects generally to each request that is overly broad and unduly burdensome. As part of this objection, SDG&E objects to discovery requests that seek “all documents” or “each and every document” and similarly worded requests on the grounds that such requests are unreasonably cumulative and duplicative, fail to identify with specificity the information or material sought, and create an unreasonable burden compared to the likelihood of such requests leading to the discovery of admissible evidence. Notwithstanding this objection, SDG&E will produce all relevant, non-privileged information not otherwise objected to that it is able to locate after reasonable inquiry.
3. SDG&E objects generally to each request to the extent that the request is vague, unintelligible, or fails to identify with sufficient particularity the information or documents requested and, thus, is not susceptible to response at this time.
4. SDG&E objects generally to each request that: (1) asks for a legal conclusion to be drawn or legal research to be conducted on the grounds that such requests are not designed to elicit facts and, thus, violate the principles underlying discovery; (2) requires SDG&E to do legal research or perform additional analyses to respond to the request; or (3) seeks access to counsel’s legal research, analyses or theories.
5. SDG&E objects generally to each request to the extent it seeks information or documents that are not reasonably calculated to lead to the discovery of admissible evidence.
6. SDG&E objects generally to each request to the extent that it is unreasonably duplicative or cumulative of other requests.
7. SDG&E objects generally to each request to the extent that it would require SDG&E to search its files for matters of public record such as filings, testimony, transcripts, decisions, orders, reports or other information, whether available in the public domain or through FERC or CPUC sources.
8. SDG&E objects generally to each request to the extent that it seeks information or documents that are not in the possession, custody or control of SDG&E.

Data Request Number: CalAdvocates-Sempra-2025RAMP-AYN-002

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 06/25/25

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9. SDG&E objects generally to each request to the extent that the request would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

10. SDG&E objects generally to each request that calls for information that contains trade secrets, is privileged or otherwise entitled to confidential protection by reference to statutory protection. SDG&E objects to providing such information absent an appropriate protective order.

II. EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.

2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.

3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.

4. These responses are made solely for the purpose of this proceeding and for no other purpose.

Data Request Number: CalAdvocates-Sempra-2025RAMP-AYN-002

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 06/25/25

Date Responded:06/25/2025

1. Please provide a detailed breakdown for all mitigation lifecycle costs (not just installation and operational lifecycle costs) of Combined Covered Conductor (CCC) and Strategic Undergrounding Program (SUG). This should include, but not be limited to, a breakdown and explanation for all:
 - a. Capital costs.
 - b. Maintenance costs.
 - c. Operation costs.
 - d. Expense costs.
 - e. Depreciation costs.
 - f. Negative salvage value and negative salvage value depreciation costs.
 - g. Rate of return and debt costs to ratepayers.
 - h. Asset retirement costs.
 - i. Other costs recovered from ratepayers.
 - j. Other costs not included above.

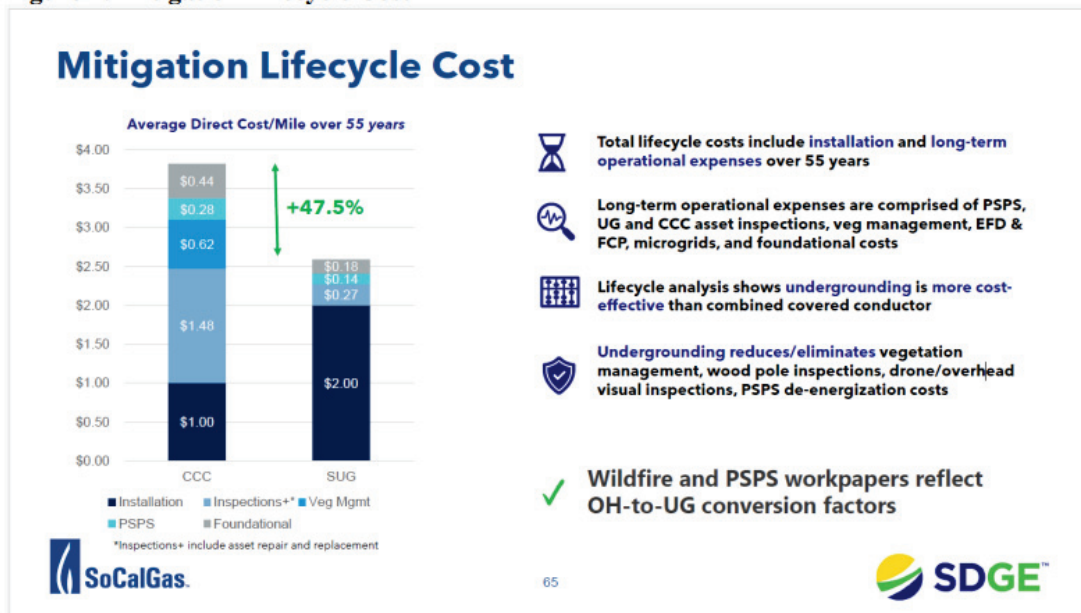
SDG&E Response 1:

SDG&E objects to the request to the extent it seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence in this proceeding, as the costs described in the request go to SDG&E's revenue requirement, and not the direct lifecycle costs for wildfire mitigation programs. Further, SDG&E objects to the request to the extent it seeks information that is not in the custody of SDG&E and calls on SDG&E to perform studies or analysis that do not currently exist, and is thus overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

For the information that SDG&E does have related to a breakdown and explanation of lifecycle costs for CCC and SUG, please see SDG&E's response to CalAdvocates-Sempra-2025RAMP-AYN-001.

2. In the June 20, 2025, SoCalGas and SDG&E held a 2025 RAMP Post Filing Webinar. On slide 65 of the presentation, SoCalGas and SDG&E shared a breakdown of the Mitigation Lifecycle Cost of CCC and SUG, where the total lifecycle costs include installation and long-term operational expenses¹ over 55 years, as shown in Figure 1. Please provide an updated Mitigation Lifecycle Cost graphic, similar to Figure 1 that includes all lifecycle costs, not just installation and long-term operational expenses, of CCC and SUG.

Figure 1: Mitigation Lifecycle Cost



SDG&E Response 2:

SDG&E objects to the request to the extent it seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence in this proceeding, as the costs described in the request go to SDG&E's revenue requirement, and not the direct lifecycle costs for wildfire mitigation programs. Further, SDG&E objects to the request to the extent it seeks information that is not in the custody of SDG&E and calls on SDG&E to perform studies or analysis that do not currently exist, and is thus overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, SDG&E responds as follows:

Please see the response to Question 1.

¹ Long-term operational expenses are comprised of PSPS, UG, and CCC asset inspections, veg management, EFD & FCP, microgrids, and foundational costs.

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Date Responded:06/25/2025

3.SDG&E's RAMP Report, Chapter SDG&E-Risk-4 Wildfire and Public Safety Power Shutoff (PSPS), states that the SUG converts overhead systems to underground, providing the dual benefits of significantly reducing wildfire risk and the need for PSPS de-energizations.

Referring to SDG&E's data request response CalAdvocates-Sempra-2025RAMP-AYN-001, Question 1.a., from June 18, 2025, the "SUG Breakdown Table" includes cost for PSPS Activation and PSPS Community Customer Outreach in its total maintenance costs.

Please explain why SDG&E anticipates PSPS costs as part of the maintenance cost for the SUG program.

SDG&E Response 3:

Operation costs associated with Public Safety Power Shutoff (PSPS) are included in the Strategic Undergrounding (SUG) program, meaning it bears a portion of the costs related to PSPS activations and community outreach. For example, an underground segment may still be de-energized if overhead distribution lines upstream are shut off for safety reasons or if weather conditions behave unpredictably. While these scenarios are less likely, they remain possible and it is reasonable to account for them in SDG&E's cost assessments. The allocation of PSPS costs to SUG is less than the allocation to Combined Covered Conductor (CCC).

Costs Associated with PSPS Activation

Emergency management is fundamentally about proactive preparation—training personnel, organizing resources, and conducting exercises so that SDG&E can respond effectively when events occur. Even in areas of the High Fire Threat District (HFTD) that have been undergrounded, the need for emergency preparedness and community outreach remains, as these are essential components of a resilient energy system.

- Ongoing Preparedness Costs: These include expenses for planning, training, and readiness activities that support PSPS response capabilities.
- PSPS Activation Costs: This unit cost is calculated based on the actual miles of circuit de-energized during a PSPS event and is adjusted by the estimated probability of such an event occurring over a 55-year timeframe.

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SDG&E Response 3-Continued:

Costs Associated with PSPS Community and Customer Outreach

These costs include support for Access and Functional Needs (AFN) customers, public awareness campaigns, tribal stakeholder and community engagement, customer notifications and communication practices, and the operation of Community Resource Centers (CRCs). These activities are critical for public safety and awareness and remain relevant even in areas with underground infrastructure.

Therefore, PSPS-related costs are anticipated as part of the SUG program's operational costs to ensure continued preparedness, effective customer communication, and public safety.

APPENDIX C

DATA REQUEST:
PAO-SDGE-2025RAMP-INFORMAL DR_001 (PDR_1422)

Data Request Number: PAO-SDGE-2025RAMP-Informal DR_001

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 08/08/25

Date Responded:08/11/2025

1. A breakdown of the CCC vs SUG lifecycle comparison chart by capital vs expense.

SDG&E Response 1:

Please see the attached file “CalAdvocates-RAMP-Informal-001_Attach.”

Note that the numbers in this attachment reflect the resubmitted 2026-2028 WMP and may differ from SDG&E's 2025 RAMP Report.

Data Request Number: PAO-SDGE-2025RAMP-Informal DR_001

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 08/08/25

Date Responded:08/11/2025

2. Details of SUG:

a. Maintenance Costs:

i. Inspections+, Repair and Replacement Capital \$242,880

ii. Inspections+, Repair and Replacement O&M \$4,400

b. Operation Costs:

i. Foundational, O&M \$124,850

ii. Foundational, Capital Cost \$58,685

SDG&E Response 2:

Please see the attached file “CalAdvocates-RAMP-Informal-001_Attach.”

Note that the numbers in this attachment reflect the resubmitted 2026-2028 WMP and may differ from SDG&E's 2025 RAMP Report.

Data Request Number: PAO-SDGE-2025RAMP-Informal DR_001

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Date Received: 08/08/25

Date Responded:08/11/2025

3. Details of CCC:

a. Maintenance Costs:

- i. Inspections+, Replacement Capital \$272,075
- ii. Inspections+, Repair Capital \$549,282
- iii. Inspections+, Repair and Replacement O&M \$617,888

b. Operation Costs:

- i. Foundational, O&M Cost \$354,090
- ii. Foundational, Capital Cost \$87,505

SDG&E Response 3.:

Please see the attached file “CalAdvocates-RAMP-Informal-001_Attach.”

Note that the numbers in this attachment reflect the resubmitted 2026-2028 WMP and may differ from SDG&E's 2025 RAMP Report.

Data Request Number: PAO-SDGE-2025RAMP-Informal DR_001

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 08/08/25

Date Responded:08/11/2025

4. SDG&E property taxes on its CCC and SUG programs.

SDG&E Response 4:

SDG&E objects to the request to the extent it seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence in this proceeding, as the costs described in the request go to SDG&E's revenue requirement, and not the direct lifecycle costs for wildfire mitigation programs. Further, SDG&E objects to the request to the extent it seeks information that is not in the custody of SDG&E and calls on SDG&E to perform studies or analysis that do not currently exist and is thus overly broad and unduly burdensome.

Data Request Number: PAO-SDGE-2025RAMP-Informal DR_001

Proceeding Name: 2025 Risk Assessment & Mitigation Phase (RAMP)(TY 2028)

Publish To: PAO

Date Received: 08/08/25

Date Responded:08/11/2025

5. SDG&E income taxes on its CCC and SUG program.

SDG&E Response 5:

SDG&E objects to the request to the extent it seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence in this proceeding, as the costs described in the request go to SDG&E's revenue requirement, and not the direct lifecycle costs for wildfire mitigation programs. Further, SDG&E objects to the request to the extent it seeks information that is not in the custody of SDG&E and calls on SDG&E to perform studies or analysis that do not currently exist and is thus overly broad and unduly burdensome.

APPENDIX D

PG&E's 2024 RAMP WORKPAPER ATTACHMENT:
RM-RMCBR-13 PVRR_CHARGE2020RUN.XLSX