

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA



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In Attendance: PRESIDENT ALICE REYNOLDS
COMMISSIONER DARCIE L. HOUCK
COMMISSIONER JOHN REYNOLDS
COMMISSIONER KAREN DOUGLAS

ADMINISTRATIVE LAW JUDGE JOHN LARSEN, presiding

Application of Southern California Gas) ORAL ARGUMENT
Company (U904G) for Authority, Among)
Other Things, to Update its Gas Revenue) Application
Requirement and Base Rates Effective on) 22-05-015
January 1, 2024.)

Application of San Diego Gas & Electric) Application
Company (U902M) for Authority, Among) 22-05-016
Other Things, to Update its Electric)
and Gas Revenue Requirement and Base) (Consolidated)
Rates Effective on January 1, 2024.)

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PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

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7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX

ARGUMENT BY	PAGE
MR. GERAGHTY	4690
MR. CAMPBELL	4703
MR. FINKELSTEIN	4711
MS. WHITE	4721
REBUTTAL ARGUMENT BY	PAGE
MR. GERAGHTY	4728
MS. FULTON	4730
MR. CAMPBELL	4733
MR. FINKELSTEIN	4735
MS. WHITE	4738

1 SAN FRANCISCO, CALIFORNIA

2 DECEMBER 15, 2025 - 1:00 P.M.

3 * * * * *

4 ADMINISTRATIVE LAW JUDGE LARSEN: We are on the
5 record.

6 This is the time and place for the oral
7 arguments in Applications A.22-05-015 and A.22-05-016,
8 the consolidated general rate case proceeding for
9 Southern California Gas Company and San Diego Gas &
10 Electric Company.

11 Good afternoon, Commissioners, and good
12 afternoon to all the parties that are participating
13 today. The November 18th, 2025, ruling outlines the
14 process and agenda for this oral argument. We will
15 begin with opening statements followed by responses and
16 then time for the commissioners to ask questions of the
17 applicants and the parties.

18 So when your name -- we have four speakers.
19 When your name is called, or the party is called, please
20 step up to this podium here, and we will get started
21 shortly. Starting with San Diego Gas & Electric
22 followed by Cal Advocates, TURN and then Protective
23 Communities Foundation.

24 All right. Without further ado, let's start
25 with San Diego Gas & Electric. And you have your

1 opening statement.

2 ARGUMENT BY MR. GERAGHTY

3 Thank you for your time today. I come to
4 humbly ask for your consideration -- or reconsideration
5 of the current SDG&E GRC Track 2 proposed decision set
6 for this Thursday, December 18th.

7 We recognize that this proceeding is an
8 after-the-fact reasonableness review. Because of that,
9 I want to spend some time reminding everybody of the
10 timeframe that these costs were incurred, these
11 activities that were at the heart of this matter for
12 which we are seeking recovery. The timeframe is 2019
13 through 2022. California was literally burning.
14 Record-breaking fires were the norm, and costs
15 associated with utility-caused wildfires in the 2017
16 through 2022 period are estimated around \$47 billion,
17 and 198 lives were lost because of the wildfires around
18 that time. And SDG&E was responsible for exactly zero
19 of those wildfire dollars and none of those fatalities.

20 On a NARUC podcast in May of this year called
21 Tech Talk for Regulators on the subject of wildfire
22 mitigation, director Caroline Thomas Jacobs of OEIS and
23 Commissioner Houck discussed the spirit of this
24 timeframe, and director Jacobs stated:

25 What was recognized to incentivize the

1 California Electric Corporations to invest in
2 specific wildfire safety improvements at that
3 rate and breadth, the comprehensiveness that
4 was required to meet the very emerging and
5 escalating wildfire risk.

6 I think that captures that timeframe really
7 well. It's a little bit different than today's
8 timeframe, but I do recommend listen to that podcast. I
9 only have 10 minutes. I think -- in that 30 minutes,
10 the exploration of where we were and where we are, I
11 think, is very well done and why the challenges we face
12 today are a little bit different than the challenges we
13 faced at that time.

14 At a recent PUC voting meeting, Commissioner
15 John Reynolds also noted the gravity of this situation.
16 Right? We've experienced our nine largest wildfires.
17 It says, quote:

18 We've experienced our 9 largest wildfires
19 as a state and 6 of our 10 most destructive
20 wildfires since 2017. The whiplash between wet
21 and dry conditions grows massive amounts of
22 vegetation that becomes tender in our
23 Mediterranean summers.

24 I've actually been in front of this Commission
25 a couple different times (unintelligible) 1054s and

1 making that exact point. And speaking from that
2 experience, I believe I am the only utility executive
3 that has made every 1054 hearing and en bancs in front
4 OEIS and Cal Fire and CPUC, and I can remember the tone
5 of each and every one of them. And the tones -- when
6 this -- when these costs were experienced -- when these
7 costs were being examined was dramatically different to
8 what we face today.

9 Back then it was, Do more. Go faster. What
10 will it take to move faster? What barriers can we
11 remove for you to accelerate it and get the items done
12 in your WMP that you're describing? How can you reduce
13 PSPS? How can you communicate with customers faster?
14 You know, there was a governor's strike force at that
15 time. We had at least one letter from a commissioner --
16 president of this Commission to the CEO compelling,
17 "What more can you do to stop these fires?"

18 SDG&E took immediate action complying with
19 increased and annually evolving wildfire planning
20 requirements while engaging in four years of
21 unanticipated investment to implement authorized WMPs
22 and reduce the chance of wildfires. But as with
23 anything else we do that touches our operations, we work
24 in the best interest of our customers and considered
25 cost efficiency and affordability at every turn, and

1 that includes developing sophisticated risk models so we
2 could harden our system in the most risk-informed and
3 cost-effective way possible at that time.

4 We were clearly ahead, and we're the lone
5 utility not starting extreme wildfires in the state and
6 the country recognized us. Our industry recognized us.
7 The governor paid a visit to SDG&E to find out what we
8 were doing different and why we are not starting
9 wildfires, and we were recognized by this body as well.
10 And that's still true today. For the 18th consecutive
11 year, SDG&E has not caused a utility-induced wildfire.

12 In many of those areas that we're gonna -- that
13 we were getting recognized for in that period of time,
14 whether it was 1054s, whether it was PSPS, whether it
15 was by the visits, by the -- and the accolades we
16 received are just disallowed in this order. Just
17 outright disallowed. We just -- we just don't
18 understand this outcome.

19 The PD looks at all our actions from the wrong
20 vantage point, applying the wrong standard of review by
21 looking at these programs with hindsight instead of
22 applying the right standard of what we knew or should
23 have known at the time, and while this is my first time
24 really going through issues like this here in
25 California -- I have nearly 40 years with regulated

1 utilities -- that is the standard of looking at costs
2 that have been experienced. This is not a GRC where
3 we're looking forward. These are actually costs that
4 were incurred. And I think it's wrong to compare our
5 costs in 2019 to 2022 to other utilities' costs in 2023
6 or even now.

7 That is not the right standard to assess
8 cost-effectiveness. The PD uses apples and oranges
9 comparisons that don't even compare to the same
10 activities. This is particularly true when we talk
11 about drones in a minute.

12 And I urge you to examine the regulatory agency
13 conflict that this PD creates. It surely just cannot be
14 the precedent that we're looking to set. The PD fails
15 to recognize that WMP approval creates utility-compliant
16 obligations, and that failure to comply carries
17 significant consequences in three important areas:

18 First, safety certificate. I think we all know
19 the criticality of the utility receiving that safety
20 certificate. If we do not comply with our WMP, we
21 cannot get that certificate.

22 Second, fines. Right? The Commission has
23 recently issued a proposed \$27 million fine to a utility
24 for not complying with its 2020 WMP target.

25 And third, I can only imagine if SDG&E ever

1 were to have an extreme wildfire, and -- the wolves out
2 there that would learn that we had not complied with
3 some part our of WMP, that would be used against us. I
4 think we all know that.

5 I do want to get into the specific
6 disallowances. And I'm going to talk about certain
7 areas of cost in this PD but not all of them. I want
8 you to know that this same Commission approved a
9 majority or almost all of the future funding for these
10 categories I'm going to discuss on a forecasted basis
11 about a year ago in our 2024 GRC rate case, yet many of
12 these activities in the PD were zeroed out, 100 percent
13 removed, all historical spending disallowed as though
14 they did not exist, did not produce value and were not
15 required.

16 Today I'm going to address only three of the
17 specific disallowances that were the most egregious:
18 Drones, data governance and community engagement. First
19 of all, with drones, the system just gets the math wrong
20 in comparing us to PG&E and comparing an inspection only
21 per inspection unit cost to our total cost of our
22 program that is doing the inspections, making the
23 repairs, investing the capital and creating an AI
24 program and database that will take our utility and,
25 quite frankly, other utilities into the future in a

1 recognizable way. And that's where the decision also
2 fails is not only just that value at that time we did
3 not start an extreme wildfire but that program to go
4 forward and the value forward.

5 If I were to be asked what is the one thing
6 that we did in this timeframe that kept SDG&E from
7 adding to the extreme wildfires that was going on, it is
8 this program. Because what I can tell you is I think
9 what was really very prudent -- it became obvious that
10 our ground-based inspections, while compliant and
11 meeting all the obligations of the state and our
12 professional qualified electric workers, they weren't
13 finding the things that the drones could find. And so
14 sitting there knowing with extreme conditions we had at
15 the time and knowing that our inspection programs that
16 we rely on cannot find these things, we got to work.

17 And I think it was very prudent to make the
18 investment to look at every single structure we had in
19 the air at SDG&E. And we wanted to make sure that we
20 just did not start a fire. Because, if you remember, at
21 that time, we were talking about the infrastructure we
22 could build, right? But we couldn't build it fast
23 enough. And I will tell you, as a prudent operator, the
24 number one thing you should make sure is the equipment
25 that you have, the things that you have are ready for

1 prime time and they're fixed and they are working.

2 We found a huge list of issues through this
3 program, and none of it was redundant. Because none of
4 the things that we found could be found in our
5 ground-based programs. And many of these findings
6 individually could have created 800 million or more
7 incident, you know, in a larger scale, combined a few of
8 them, over 5 billion. So the program produced benefits.

9 And while there were startup costs with the
10 drones, most of those around safety, they are flying
11 around with a lithium battery in high-fire threat area
12 with extra costs for safety personnel and a ton of extra
13 requirements communicating with our customers. Because,
14 as you can imagine, especially in this timeframe, during
15 COVID, drones flying over people's homes was not really
16 what they were super interested in and would spend a lot
17 of time making sure we got it right from the very
18 beginning on our drone program.

19 And we will look back at this in a few years
20 because not only have we received all of this value then
21 and now -- because to this day I personally use that
22 data, those pictures, those videos of things that we
23 captured in this timeframe, but it's going to go beyond
24 that. Because I believe we'll have a future state to
25 where even with fixed wing, much larger aircraft, we

1 will be able to snapshot our territory, rapidly file it
2 through AI engines -- right? -- that will use the very
3 models we created to find these defects and now we will
4 find things and fix them rapidly. And that will be the
5 most cost-effective thing we could possibly imagine here
6 in California.

7 But lastly, being compared to PG&E -- and this
8 one is really very difficult -- their program is not
9 comparable with ours. We remain, subject to check, the
10 only utility that has actually flown a drone over every
11 single one of its overhead assets. We know where
12 everything is and what its conditions were, and we have
13 a detailed record of it that we can rely on at any time.

14 We reviewed our entire HFTD within 30 months
15 rapidly showing how important it was to get this done as
16 fast as possible. Our costs, as I reported earlier,
17 include all of our costs, the O&M, the capital,
18 developing the AI models, developing the programs that
19 recognize the flaws. PG&E's just don't. But if we are
20 going to be compared to them, we'd like to be compared
21 on the recovery of their costs. Because they recovered
22 their drone program cost. We virtually recover almost
23 none.

24 I'd like to go to data governance. This one's
25 really very challenging to understand. It is completely

1 zeroed out, and it's something that we're compelled to
2 do. We don't have a choice. We have to do this. And
3 in fact, the \$27 million fine I referenced just a minute
4 ago, that was specifically for not meeting data
5 governance requirements in the WMP targets. So at that
6 time, we had to create tools to gather the data that the
7 state was demanding in order to properly provide
8 oversight, and I completely understand that.

9 Data governance was a game changer for
10 regulators, and it allowed them to understand the
11 progress we were making in wildfire mitigation. We were
12 actively talking about that in our 1054s at that
13 timeframe. "How are you doing?" "Can you do it
14 faster?" "It's September. You're only at 30 percent of
15 this completion item. Will you get to the next area?"
16 I mean, we were building -- building the plane that
17 we're flying today at that time timeframe.

18 And the primary driver of our data governance
19 costs are the incremental requirements in OIS -- OEIS
20 guidelines that require to use data schema that they
21 have revised every year since 2020. And the PD
22 challenges the costs we spent on data governance arguing
23 that it was not incremental, but nowhere else in our
24 business, in our utility work do we have to produce over
25 2,000 metrics and geospatial reports on a quarterly

1 basis for regulators but in the WMP space and those
2 requirements all came after our 2019 GRC.

3 And finally, community engagement. The last
4 specific disallowance is another area where zero cost
5 recovery is -- is -- is just bewildering. The
6 stakeholder community engagement activities were driven
7 by the PSPS OIR and strong directives from singer --
8 senior regulators and policy makers during this
9 timeframe.

10 Again, I sat in this room or online or -- and
11 other places as when went through this and never once in
12 anything with customers were we ever asked, "Slow down."
13 "Pump the brakes." "That's too much." It was always --
14 because we understood while PSPS was going to be the
15 last-resort decision, if we had to pull that pin, we had
16 to take care of customers -- and I'm really very proud
17 at every event we ever came up through here we found a
18 way to do more, get more done and be a better -- better
19 advocate for our customers.

20 And the CPUC has issues in this space, millions
21 of dollars in fines to all three utilities, millions of
22 dollars in fines. In fact, the other two utilities
23 received almost \$10 million each in fines or more.
24 SDG&E received 100,000. And I think that's a direct
25 result of -- of being efficient, making sure that we put

1 our customers first and listening to the guidance we
2 were getting from regulators on where to invest and what
3 problems to solve.

4 But these costs are not just -- are just not an
5 app. And that's kind of the way it was kind of
6 characterized. And it's a little frustrating. The app
7 is a small portion of the cost that we experienced in
8 this bucket of dollars, right? This is where we're
9 doing everything for our customers, right? This is
10 where we're doing our community resource centers, our
11 outreach to our tribal communities, our work with our
12 emergency service providers, our notification system to
13 our customers alerting them that there's concerns and
14 making sure we're communicating with them in the best
15 possible ways, right? It is working with our CBOs and
16 our partners during the PSPS.

17 But, again, lastly, if you are to compare us
18 with the other utilities, we think we are doing the best
19 in the space, but we'd sure like to have the recovery
20 that they've experienced for this cost. Because they
21 recovered something. We're recovering nothing in an
22 area where I think we're generally regarded as having
23 moved the ball down the field and finding new ways to do
24 great things with customers.

25 And in close, I hope you'll leave the hearing

1 understanding the significance of the disallowance made
2 to the key wildfire risk mitigation programs that we're
3 talking about, and I can understand the temptation to
4 look back at costs incurred six years ago and deem them
5 improper through today's lens. Again, I think that
6 podcast captured this extremely, extremely fairly. We
7 must resist that hindsight -- right? -- and remember
8 that the time period within which these cost were
9 incurred it was an extremely high-risk period where
10 everybody was doing anything they could to stop fires
11 from happening.

12 Quite frankly, that foundation that we built
13 are the things that enable us today to go look at how we
14 want to approach this going forward. But that
15 foundation was at a cost at SDG&E. We have not started
16 a fire in 18 years, yet we're being severely punished --

17 ALJ LARSEN: You're at -- you're at 15 minutes.
18 I let you go --

19 MR. GERAGHTY: Oh, I'm sorry.

20 ALJ LARSEN: I'm going to give everyone 15
21 minutes. But --

22 MR. GERAGHTY: Step away then?

23 ALJ LARSEN: Yeah. I think we should cut it
24 off.

25 MR. GERAGHTY: Okay. Thank you.

1 ALJ LARSEN: Thank you.]

2 Okay. Next up is Cal Advocates.

3 Thank you.

4 ARGUMENT BY MR. CAMPBELL

5 Good afternoon, President Reynolds,
6 Commissioners, ALJ Houck -- oh, ALJ. Thinking of the
7 word "Houck" and trying to speak at the same time, that
8 will get ya. ALJ Larsen.

9 My name is Mike Campbell, Deputy Director of
10 Energy at Public Advocates Office.

11 Before diving into a few aspects of the
12 proposed decision, I am just going to take a couple of
13 minutes to talk a little bit about what SDG&E just went
14 over and were in written comments that were out there at
15 the beginning.

16 And I couldn't ask for a better segue, because
17 I was going to talk about the differences between SDG&E
18 and the other utilities and that timeframe in 2019.

19 As was described, that was a -- a time of
20 crisis in California, and there were a number of fires,
21 and there's some fresh legislation but SDG&E really made
22 its major -- learned its -- a lot of its lessons and
23 became the leader because of the fires that it had in
24 2007.

25 And so, by -- and then in 2010, yes, they were

1 -- were sanctioned. Part of the settlement. But let's
2 keep in mind that, you know, a big part of what the
3 legislation that came out in 2019 and other things,
4 there was recognition that this new WMP requirements may
5 have some costs that weren't general rate cases. There
6 might be new. There might need to be an opportunity for
7 that. And when those costs that were outside of the
8 general rate case that nobody could have anticipated
9 that they would take a high degree of scrutiny from the
10 Commission, in terms of looking at those costs after the
11 fact. But as I mentioned at the outset, SDG&E is
12 already well ahead.

13 So, in terms of things that were -- they were
14 already putting in practice a lot of these -- these
15 things, and I would agree that they were and remain a
16 leader in this space. So, I think they deserve kudos
17 for that but painting them with the same broad brush as
18 the other utilities in 2019 is just, I think, picking
19 and choosing history a little bit there.

20 So -- so, let's talk a little bit about what it
21 means to be an unreasonable distributor and -- and why
22 we are here, and what these things are all about.

23 So, that created an opportunity for utilities
24 to track costs in memorandum accounts related to
25 wildfire mitigation. They are specifically supposed to

1 be other things that weren't, you know, thought about in
2 the -- in the prospective GRC budget vetting process and
3 to be recovered, they had to be incremental to the GRC
4 and they had to be reasonable, not just incremental, but
5 they had to be reasonable to have ratepayers paying
6 more.

7 So, in the slides that SDG&E provided in
8 advance, I was a bit troubled that it expresses and
9 emphasizes this feeling about the memo accounts that if
10 it doesn't get the costs -- get customers' bills raised
11 to cover the costs that it recorded in these memo
12 accounts that that is tantamount to a penalty, and that
13 you would be providing a penalty. That's -- I -- that's
14 just the wrong framing, frankly.

15 So, as I mentioned, in establishing the memo
16 accounts the legislation was very clear that what
17 you're -- as commissioners and as an ALJ, what you're
18 having to look at is whether those costs are actually
19 appropriate to put into rates. The time of an
20 affordability is inappropriate to raise customers' bills
21 for this.

22 I am sorry, it's not usually my -- my style
23 to -- I'm not a lawyer. It's not my style to cite to PU
24 Code but I am going to do so here. So, specifically PU
25 Code Section 8386.4 -- I will spare all the letters and

1 numbers -- you know, that -- that allows the Commission
2 to, you know, set up the memo accounts, and it says
3 those are to cover costs that are unforeseen and
4 incremental to the wildfire risk mitigation programs and
5 the activities authorized in the electrical
6 corporation's revenue requirements. And it also
7 continues to say:

8 The Commission shall review the costs in
9 the memorandum accounts and disallow recovery
10 of those costs the Commission deems
11 unreasonable.

12 That's why we are here. That is not a penalty.
13 That's -- unfortunately, that's -- that's a tough job,
14 but that's your job, and that's what we are all here to
15 try and help with.

16 So, at a time when affordability is front and
17 center, and from this dais, you all have made eloquent
18 comments repeatedly, at voting meetings and elsewhere,
19 about the need to carefully scrutinize the costs. The
20 nature of these requests.

21 This is not a budget setting exercise like a
22 GRC. This is an opportunity for the utilities, for
23 SDG&E in this case, to go beyond the GRC budget and
24 directly increase customer bills.

25 So, saying this is a penalty, again, no, this

1 is the life of the regulated utility. They have the
2 obligation, and as the -- and the PD appropriately
3 highlights this, the utility has the obligation and
4 responsibility to make its case that these costs are
5 just and reasonable for you to make ratepayers pay more.
6 It's not for parties like us. It's not for you to
7 define. It's not for us to argue what they put in
8 there. We're not -- it's for them to make that case,
9 and the PD does get that language right. We do have a
10 couple -- and I am going to criticize the PD in a couple
11 of places, and I'll get to that just next, but I think
12 that's a really important framing of why we are here.

13 So, the next thing I want to touch on about in
14 the PD has to do with incrementality and reasonableness.

15 So, specifically, in the elements that, of
16 course, the PD did not agree with arguments we were
17 making about the -- SDG&E's labors cost, to have it be
18 reasonable to -- for recovery, SDG&E really needed to
19 provide documentation and to substantiate that those
20 costs were not already embedded in the existing rates.

21 SDG&E did not provide analysis to establish
22 whether its recorded labor activities were reflected in
23 its revenue requirement, and this constitutes a failure
24 by SDG&E to make -- meet its burden of proof on this
25 matter.

1 Again, the burden of proof, I think, is well
2 articulated in the PD just misapplied in this case.

3 So, when we were looking at this, SDG&E stated
4 it was unable to identify any new specific employees or
5 hiring dates outside of the wildfire and climate science
6 division, which it can document only a few new hires.
7 It was not able, in this case, to provide a record of
8 timesheets. Employees record their time, apparently, on
9 an allocation basis without any other documentation or
10 substantiation that they are performing WMP-related
11 activities. They didn't provide any documentation to
12 show that any of those activities -- those employees
13 working the wildfire mitigation were not already
14 previously funded by the GRC.

15 So, how can SDG&E claim that all its labor is
16 incremental when it can't identify whether the employees
17 were already working on wildfire or wildfire mitigation
18 from the GRC? And there is no contemporaneous time
19 records for this to help us sort that out.

20 Again, we want above and beyond. We tried. We
21 tried to take it in good faith. We -- we couldn't
22 substantiate -- that -- that just fundamentally fails
23 that burden of proof.

24 And -- and why is this really important? Why
25 does -- why do Cal Advocates -- why do I keep harping on

1 this here and in other cases? Well, without this review
2 to make sure that the costs are reasonable and to add to
3 increasingly burdening customer bills, this creates an
4 unmitigated loophole for -- where the utility can simply
5 reallocate personnel and materials to one of these memo
6 accounts and instantly boost its profits one-for-one.

7 So, a hypothetical way you could do it, if the
8 utility were to reallocate its work on some scheduled
9 maintenance and spend that -- and spend those resources
10 and personnel WMP work, they -- they were funded for it.
11 The funding was there. It was already in rates, so
12 should customers be charged for this maintenance work
13 that is no longer being done? Should they be required
14 to pay extra for the WMP work that was being done? So,
15 that is the proper test of reasonableness that really,
16 you know, goes beyond just incrementality. There are no
17 meaningful guardrails, and we can have a very perverse
18 outcome.

19 The last area I want to touch base on has to do
20 with the unfortunate use of the word "de minimis" in
21 terms of talking about costs that were authorized
22 outside of the high fire threat districts.

23 So, as I highlighted at the start, these cases
24 really require a high level of scrutiny because they are
25 a release valve for utilities to go beyond the budgets

1 established in the GRCs, so we're -- when we read the
2 PD, we were really concerned about the language that
3 disregarded the costs for work outside of the high fire
4 threat districts as just de minimis, and then downplays
5 the need for scrutiny there. There is nothing small or
6 trifling these days in terms of rates. \$68 million
7 should not be considered small or trifling, and I
8 recognize there's a percentage, sure, but it's -- it's
9 really incumbent upon all of us, especially the
10 Commission, to really scrutinize this closely.

11 We would like to see the PD revised to apply
12 scrutiny to each one of those projects included in
13 SDG&E's request and determine if it really is justified
14 and under the framework of incrementality and
15 reasonableness should it be added to ratepayer bills.
16 The relative percentage of the amount of the work done
17 should not be the basis for that decision.

18 And just a quick example, as we -- as we did
19 our review of the work that SDG&E submitted that it did
20 outside to have Tier 2 and Tier 3 high fire threat
21 areas, of the 17 that included work within the grid
22 design system hardening, 11 of those costs -- included
23 costs of work that was performed outside of those threat
24 districts; and 4 of those 11, the percentage of work
25 performed outside was between 20 and 40 percent. That's

1 starting to be a pretty large fraction, again. And we
2 are concerned that that could have led to prioritizing
3 work outside the -- the highest risk areas. Of course,
4 it would reduce risk but they -- the consequence of this
5 is not de minimis.

6 I thank you for your time this afternoon and
7 look forward to the discussion.

8 ALJ LARSEN: All right. Thank you. Next up is
9 TURN.

10 Mr. Finkelstein?

11 ARGUMENT BY MR. FINKELSTEIN

12 Thank you, Judge Larsen. Commissioners, I am
13 Robert Finkelstein appearing on behalf of TURN.

14 Let me start by saying it's hard to overstate
15 how inadequate San Diego's cost-effectiveness, cost
16 reasonableness showing was in this proceeding. The
17 record actually supports a far greater disallowance than
18 what the PD would have you adopt. The -- this -- you
19 need to reject across the board San Diego's calls for
20 shifts in its favor in the proposed decision.

21 Based on the record, there's nothing that would
22 support their -- their claims about the drone program,
23 you know, the -- the need to give them more money for
24 that now. Certainly, there's nothing that would support
25 awarding them memorandum account interest. That's -- it

1 ought to be a disallowance specifically tied to how poor
2 their showing was in this proceeding.

3 What you should do is look again at the
4 strategic undergrounding spending and realize that
5 there's been repeated references to the lack of support
6 for that in all the reviews of it during the timeframe
7 in question. During this period of what San Diego knew
8 or should have known at the time it was making
9 decisions.

10 If you look at the full record on that, we are
11 confident that you would agree that a disallowance of
12 some portion of the costs of that program is also
13 warranted here.

14 I am going to overlap a little bit with my
15 colleague from Cal Advocates. There is a certain amount
16 of discussion of the framework for reasonable reviews
17 generally and what applies specifically to the review of
18 wildfire mitigation plan spending.

19 A memorandum account gives San Diego an
20 opportunity to recover costs that it wouldn't otherwise
21 cost -- I'm sorry -- recover costs that it wouldn't
22 otherwise recover. It is an opportunity for the utility
23 to get more, and it comes with a clear responsibility to
24 the utility. It has to demonstrate that the costs that
25 it's going to recover through that memorandum account

1 are reasonable. That has got to be the balance that the
2 Commission recognizes and enforces here.

3 If ratepayers are going to be made to pay these
4 extraordinary costs, at the very least ratepayers are
5 entitled to assurance that we're only paying for the
6 reasonable costs that were recorded.

7 What we have here is a failure of a magnitude
8 that still boggles my mind. I mean, I have got a number
9 of years of dealing with these matters in Commission
10 proceedings and San Diego's insistence that it only
11 needed to show the wildfire mitigation plans, and it
12 only needed to show cost information at just the highest
13 level, still, I am not sure what to do with.

14 TURN had taken the step of calling for unusual
15 relief of kick this out and tell them to start all over
16 again. Tell them to do it better. I understand that's
17 a -- a hard recommendation to get a lot of traction
18 with. Nobody wants to go through these proceedings
19 once. The notion of going through it twice is less than
20 appealing, shall I say, yet it seemed the only way to
21 really remedy the deficiencies of the utility's showing,
22 otherwise the right answer, according to regulatory law
23 and regulatory practices, is they ought to recover
24 nothing or very close to it.

25 The lack of showing of cost reasonableness,

1 cost-effectiveness, it -- it was really that deep
2 throughout their -- their showing.

3 It is -- San Diego's representative was
4 correct. It is the prudent manager standard that gets
5 applied here, and the prudent manager standard is based
6 on what San Diego knew or should have known at the time
7 that it was making decisions but it has to demonstrate
8 reasonableness not just of, "We had to do everything we
9 could to respond to wildfire risk." It has to be there
10 are tradeoffs in terms of the cost that we can incur and
11 the improvements that we could achieve and we fully
12 consider those tradeoffs, and we fully reflected them in
13 our decision making and that showing just wasn't made
14 here.

15 So, the proposed decision takes the right
16 approach of saying if you don't make a showing of cost
17 reasonableness, you don't get recovery and applies it to
18 a couple of San Diego's initiatives here. That happened
19 with covered conductor. It happens with the drone
20 inspections that you've heard so much about, but it --
21 it fails to do it with other large initiatives. Again,
22 the strategic undergrounding program. It -- it -- if
23 anything happens in terms of modifying the PD, it really
24 ought to be a close look at that program and a
25 substantial disallowance tied to that.

1 Specifically to the review of wildfire
2 mitigation spending, you also need to stick with your
3 longstanding recognition that what happens in terms of
4 presentation and review of the wildfire mitigation plan
5 is separate from your review and determination of cost
6 reasonableness.

7 That is what you've said since the very first
8 decision in 2019 when wildfire mitigation plans became a
9 thing, and you said it as recently as the Track 1
10 decision in San Diego's general rate case decision.

11 The vast majority of San Diego's showing here
12 was to just attach its wildfire mitigation plans to its
13 testimony and say the cost information is in there. In
14 each one of those wildfire mitigation plans, the cost
15 information about these initiatives appears in -- I
16 mean, each of these plans is hundreds of pages long. In
17 each one of them, the cost information is a single table
18 buried at the back of the document. And for each
19 initiative, it is a single line of information in that
20 table. So, \$240 million of direct costs for strategic
21 undergrounding; one line, one table. \$136 million for
22 covered conductor. Again, one line, one table. The
23 \$137 million for drone inspections -- and we will get
24 back to this in a second -- it's one and one table
25 without any distinction that there are costs beyond

1 inspections that are being covered. That never comes
2 up.

3 Simply put, the wildfire mitigation plant
4 materials don't have the kind of information that is
5 needed for a demonstration of cost reasonableness, yet
6 that is what San Diego relied upon to make its showing
7 here.

8 And it's important to recognize that it's not
9 just TURN saying this. It's also the entities that
10 reviewed the wildfire mitigation plans. It -- it's --
11 the review for the 2020, 2021 and 2022 WMP materials
12 that San Diego submitted that was performed by first SPD
13 and then for the last one, Energy Safety.

14 So, in the 2020 WSD review, they said that
15 San Diego's WMP was not providing the information
16 needed:

17 In order to evaluate whether San Diego Gas
18 & Electric is pursuing those very costs and
19 mitigations in the most cost-effective manner.
20 That was specific to the discussion of overhead
21 distribution work and undergrounding.

22 For the 2021 WMP:

23 SDG&E does not demonstrate that its
24 undergrounding and covered conductor mitigation
25 efforts are focused on efficiently reducing

1 wildfire risk and PSPS events. It also does
2 not demonstrate that its undergrounding plans
3 are an efficient use of resources.

4 If you're getting feedback like that on your
5 WMP as submitted to the entities that aren't even
6 charged with reviewing cost reasonableness, it should
7 have been a signal to San Diego that it needed more in
8 order to demonstrate cost reasonableness here, and San
9 Diego chose to go otherwise. San Diego chose to rely --
10 stand pat on its WMPs; and as a result, they just didn't
11 show cost reasonableness.]

12 Let me turn briefly to San Diego's handout for
13 this oral argument. It's certainly an attempt to make
14 their evidentiary showing after the evidentiary record
15 has closed. It's similar to the materials that they've
16 had to produce, that they've also been using for their
17 ex parte meetings at your offices.

18 Page 2 of the five-page document compares
19 disallowances here with the amounts that were authorized
20 in the GRC. What San Diego fails to mention is that in
21 the GRC these particular categories that they selected
22 were uncontested. In the GRC that addresses scores of
23 contested matters, issues that are uncontested get far
24 less scrutiny. They pretty much slide right through,
25 and that's what happened here.

1 For purposes of this reasonableness review, the
2 more relevant comparison would be an initiative where
3 the costs were actually contested in both proceedings
4 such as strategic undergrounding. You adopted a
5 substantial disallowance to strategic undergrounding in
6 the 2024 GRC and virtually no disallowance here, and
7 that we think needs to be remedied in the proposed
8 decision.

9 Page 3 of the handout, San Diego compares
10 itself with being unfairly treated when you look at
11 what's happened with PG&E and Edison. It's not at all
12 clear to me why San Diego thinks this is a valid,
13 illuminating comparison. I mean, it's just math. Given
14 the relative sizes of the utilities, a dollar of
15 disallowance to San Diego is going to be a higher
16 percentage than a dollar of disallowance to either
17 Edison or PG&E if you compare it based on a
18 revenue-requirement basis. That doesn't show anything.

19 I think the far more likely explanation for
20 this pattern that San Diego is tracking is that however
21 deficient the showing was that Edison or PG&E made --
22 and it likely was deficient; there were disallowances
23 that were adopted -- however deficient it was for those
24 utilities, San Diego's is worse. That's actually what
25 we're dealing with here. So it shouldn't be they are

1 allowed to somehow bootstrap their showing by saying you
2 gave the money to PG&E and Edison. It's a far different
3 set of circumstances.

4 Finally, on drones: Let me start with a
5 personal observation that I suspect is consistent with
6 your shared experience. Whenever a utility decides it
7 needs to try to bolster its position by resorting to
8 material that's not in the record, it's a sign that the
9 material that is in the record is not adequate, and
10 that's what we have here.

11 If you look at the material -- well,
12 San Diego's largely emphasizing this distinction that
13 they say the proposed decision missed between the
14 inspection cost tied to the drone program and the
15 subsequent repair or replacement cost that it incurred
16 because of problems identified through the drone
17 program, and I agree there's a certain logic to that.

18 It is also completely missing from the record.
19 They've not cited anything to the record for this
20 distinction. They've not cited anything in the record
21 for this cost figure they've come up with now that's
22 supposed to be just the repair and replacement cost.

23 I spent some time going back through the
24 materials on this. I found nothing that's a reference
25 to the drone program being anything other than

1 inspections. Nothing that suggested there were also
2 cost of repairs and replacements here.

3 So whatever you think of San Diego's current
4 logic, current explanation, you have to understand it's
5 not supported by the record as San Diego created the
6 record in support of its cost-recovery request.

7 One other point, San Diego's representative
8 referred to a sophisticated rate model that's underlying
9 its development of its Wildfire Mitigation Plan
10 initiatives. The only such program that I've heard
11 referred to is its WiNGS, and I'm not going to remember
12 what the acronym stands for, but it is a program that
13 only applies, if at all, around the very fringes of the
14 spending that's at issue here.

15 It was implemented in 2022 to only a limited
16 portion of the initiatives. And to those, it only would
17 have applied to those -- to the work that was planned in
18 2022 and added to rate base, put in service before the
19 end of 2022, and for covered conductor and strategic
20 undergrounding, which was the limited area that they
21 applied it to. It's highly unlikely that many, if any,
22 programs got through those steps in the one-year period.

23 So it's true they've got some new analytical
24 tools that they started to use in 2022. They didn't
25 affect the spending. At least to the extent that

1 they're referring to in WiNGS, it did not affect the
2 spending in any substantial way that's at issue in this
3 proceeding.

4 Thank you for your time.

5 ALJ LARSEN: Next is PCF Foundation.

6 ARGUMENT BY MS. WHITE

7 Good afternoon, Commissioners and ALJ Larsen.

8 Before I start, does President Alice Reynolds
9 have my written document?

10 PRESIDENT REYNOLDS: No, I don't.

11 (Document brought to President Reynolds.)

12 MS. WHITE: SDG&E customers pay some of the
13 highest rates in the nation. By approving 1.035 billion
14 of SDG&E's spending, the PD will needlessly contribute
15 to higher rates for San Diego's businesses and families
16 unless it addresses SDG&E's failure to prove its costs
17 in four major areas: Undergrounding; 2023 to 2027
18 costs; spending discrepancies; and the lack of support
19 for prior SDG&E WMP spending found by the OEIS audit,
20 which could result in over-recovery.

21 As a threshold issue, under Section 463(b), the
22 Commission must disallow costs for which SDG&E, quote,
23 "fails to prepare or maintain records sufficient to
24 enable the Commission to completely evaluate," end
25 quote, the reasonableness of the cost.

1 The PD does deny some of the costs for which
2 SDG&E failed to establish reasonableness, for example,
3 for fuel management costs, but for many other cost
4 categories, the PD instructs SDG&E that it must do
5 better next time, but then does not hold SDG&E
6 accountable for failing to demonstrate the
7 reasonableness of its costs. For example, the PD
8 acknowledges that SDG&E failed to provide the risk
9 analysis the Commission required for undergrounding, but
10 the PD does not reduce any of SDG&E's costs or otherwise
11 hold SDG&E accountable now.

12 In every place where the PD acknowledges that
13 SDG&E failed to comply with Commission standards, the PD
14 must be revised to also deny SDG&E costs.

15 Now, I will turn to the four major areas where
16 SDG&E failed to prove its costs. First, the Commission
17 should not authorize any of SDG&E's undergrounding costs
18 because SDG&E failed to establish cost-effectiveness;
19 the 241 million in undergrounding spending, which the PD
20 approved, constitutes 23 percent of the total costs
21 approved. SDG&E found that undergrounding only reduced
22 0.67 ignitions between 2019 and 2022. This amounts to
23 360 million per ignition avoided.

24 In contrast, patrol inspections of distribution
25 equipment cost 500,000 per ignition avoided or were 700

1 times less costly per ignition reduction than
2 undergrounding and just as effective at reducing
3 ignitions.

4 SDG&E did not explain in testimony why it spent
5 241 million on undergrounding. SDG&E also did not
6 evaluate whether other alternatives to undergrounding
7 could have been more cost-effective, such as the
8 combination of additional inspections and the
9 installation of solar plus storage.

10 The PD compounds the failures to assess the
11 cost-effectiveness of SDG&E's undergrounding by not
12 considering any of the more effective alternatives that
13 are in the record here.

14 PCF established in testimony that it would be
15 cheaper to provide solar plus storage to every customer
16 in the Tier 3 high-fire-threat district than the amount
17 SDG&E spent on its major capital projects:
18 Undergrounding, covered conductor, distribution overhead
19 system hardening, and drone inspections.

20 The PD only acknowledges that solar plus
21 storage may have increasing merit, but then it fails to
22 consider solar plus storage as an alternative to
23 undergrounding as it is required to do under United
24 States Steel Corp versus PUC.

25 Second, the Commission should not authorize any

1 requested 2023 to 2027 costs because the scoping memo
2 did not include any consideration of those costs. Just
3 last year in Golden State Water Company versus PUC, the
4 California Supreme Court ruled that if a topic is not
5 included in the scoping memo, it is out of scope.

6 Here, in Track 2, the scoping memo clearly
7 states that the cost to be addressed in this proceeding
8 only involves SDG&E's recorded amounts in its Wildfire
9 Mitigation Plan Memorandum Account for the period of
10 2019 to 2022. Plus, pursuant to Golden State Water's
11 mandate, the PD must be revised to reject the 576
12 million requested for 2023 to 2027 because those costs
13 were out of scope and cannot lawfully be authorized
14 given the scoping memo in this proceeding.

15 Third, the PD must be revised to address the
16 numerous discrepancies between costs that SDG&E recorded
17 in testimony in this proceeding and costs that SDG&E
18 reported to OEIS.

19 PCF identified 19 different programs with
20 spending discrepancies between the WMPs and testimony.
21 These discrepancies are listed on pages two and three of
22 the handout I provided. SDG&E has offered no specific
23 rebuttal for these discrepancies.

24 The PD acknowledges that numerous spending
25 discrepancies exist, but then would wave the problem

1 away by stating that it grants more weight to the cost
2 in the testimony than the WMP, but the PD does not
3 resolve the fundamental problem that SDG&E provided
4 different amounts for its purported costs to OEIS and to
5 the Commission. The widespread, large variability
6 between costs in the WMPs and in the testimony
7 eliminates any confidence in SDG&E's recordkeeping and
8 cost documentation.

9 The PD must be revised to analyze why SDG&E
10 provided conflicting information to OEIS and to the
11 Commission. The Commission should require SDG&E under
12 oath to specify which amount is the correct number and
13 why.

14 Hereto, pursuant to Section 463(b), the PD
15 should be revised to disallow any cost for which SDG&E
16 cannot explain the discrepancies in the spending it
17 reported to two different government agencies for the
18 same programs.

19 Fourth, the 240 million that the CPUC/OEIS
20 Crowe audit identified as "underspent" should be
21 returned to ratepayers. The PD fails to adequately
22 address the audit's findings, which are on page one of
23 the handout I provided. The PD holds back SDG&E avoided
24 the concerns in the audit of underspending in the
25 electric distribution capital and over-recover by

1 overspending in unrelated cost categories in subsequent
2 years.

3 The PD concludes that the 240 million in
4 underspending in electric distribution capital does not
5 matter because SDG&E overspent overall by 180 million
6 for its safety, reliability and maintenance categories,
7 but SDG&E fails to establish that it had the authority
8 to reprioritize any of its funds, which were only
9 intended to be authorized for specific programs in the
10 2019 GRC.

11 The PD cites SDG&E's reply briefs as evidence
12 that SDG&E is allowed to reprioritize funds.
13 D.11-05-018, which SDG&E relies on, originates from
14 before any wildfire mitigation claims were first
15 required in 2019 in SB 901.

16 In D.11-05-018, the Commission asserted that
17 reprioritized costs must still be determined to be just
18 and reasonable and warned that reprioritization can
19 undermine the Commission's reasonableness review.

20 Here, SDG&E cannot prove that its diverted
21 costs were just and reasonable because SDG&E in its
22 testimony in supplemental exhibits never explained which
23 funds were diverted where nor explains why its costs
24 were diverted. Thus the PD must be revised to deny the
25 240 million in reprioritized funds.

1 Additionally, the audit found that SDG&E's WMP
2 cost categorization did not align with the GRC adopted
3 cost categories making it difficult to determine whether
4 SDG&E's costs were incremental. The PD relies solely on
5 SDG&E's supplemental evidence to conclude that SDG&E's
6 costs were incremental, but the supplemental evidence is
7 not sufficient to track the spending over time in
8 programs.

9 The PD fails to ensure that SDG&E's admitted
10 prior diversion of 2019 spending has not already paid
11 for programs which are requested here in this GRC;
12 therefore, the PD should be revised to track the
13 diverted spending to ensure it does not result in
14 double recovery here.

15 Finally, the PD should also be revised to
16 reduce the amount of spending authorized for covered
17 conductor. The PD reduces the amount of spending to
18 SD- -- or to PG&E's unit costs up from 1.6 million per
19 mile to PG&E's unit cost of 1.3 million per mile, but
20 PG&E's unit costs were not reasonable either. The Joint
21 IOU's covered conductor working group report found that
22 PG&E's estimated unit cost was actually 826,000 per
23 mile.

24 And the Commission's own website estimates
25 covered conductor cost at 480,000 per mile; so,

1 therefore, the PD should be revised to further deny and
2 reduce covered conductor costs.

3 So in conclusion, the PD should be revised to
4 deny each and every unjustified cost under Section
5 463(b). It should also deny undergrounding costs and
6 evaluate whether solar plus storage comprises the better
7 and more cost-effective alternative to SDG&E's expensive
8 choice of spending. It should reject 2023 to 2027 costs
9 as out of scope. It should reject any unexplained cost
10 discrepancies.

11 And the PD should be revised to account for the
12 240 million authorized by the 2019 GRC for WMP programs
13 which the audit concluded could not be tracked or
14 accounted for in SDG&E's recordkeeping information.

15 Thank you.

16 ALJ LARSEN: All right. Thank you.

17 That concludes the opening statements.

18 We'll now move on to rebuttal. We're going
19 back to the same order, starting with SDG&E. We had 10
20 minutes and five minutes. We did go over in the opening
21 statement, but we'll try to stick to five minutes.

22 REBUTTAL ARGUMENT BY MR. GERAGHTY

23 Thank you. I'll be really brief as I'm going
24 to have Laura Fulton address some of the detailed
25 analysis of some of the records.

1 First of all, SDG&E's success between 2007 and
2 2019 is not part of this examination, and I think the
3 establishment of the memo accounts clearly shows the
4 rapid onset of the risk we're facing at this time; for
5 example, the drones they talked about earlier were not
6 in any previous timeframe, and the overwhelming amount
7 of those costs were for repairs and fixes and are in the
8 record.

9 The program itself is dire. Drone inspection,
10 assessment and repair, we think the record is clear on
11 that. Regarding labor, SDG&E hired approximately 40
12 people in the WMP programs. We think the PD and the
13 record clearly reflects incrementality; our Ernst &
14 Young report clearly demonstrates incrementality, and we
15 believe the record demonstrates incrementality.

16 We did do everything -- we did not do
17 everything we wanted to do in this timeframe. It was
18 impossible. What I can assure you is regardless of what
19 anybody would think about our risk model, it was the
20 best on the planet.

21 I started at SDG&E; three days later I was in a
22 meeting; we were actually detailed looking at segment by
23 segment.

24 And it's not as easy as, "What's the most
25 extreme circuit and are you addressing it today?" It's

1 some things like, "Can you keep a community in power?"

2 So let's do that strategic undergrounding in
3 that location so that the small town can have a
4 hospital, police station, water, et cetera.

5 So it's not just as simple as that. We
6 carefully considered that in this timeframe. So our
7 tools today may be better. I think our decisions will
8 be better going forward, but in this timeframe, we were
9 still working with the best tool, but that tool has
10 evolved over time.]

11 And I'd like to turn it over to Laura for the
12 balance.

13 REBUTTAL ARGUMENT BY MS. FULTON

14 Thank you. My name is Laura Fulton
15 representing SDG&E. I want to address -- TURN talks
16 about how the Commission is -- that SDG&E cites the
17 right standard of review in a proceeding like this, but
18 as they started off their comments -- he emphasized like
19 sort of a higher responsibility in some -- in a
20 reasonableness review. And, again, that shows their
21 constant effort throughout this case to apply a higher
22 standard of review for a reasonableness review after the
23 fact beyond the prudent mandatory standard. That --
24 and, again, also that cost-effectiveness should take
25 priority over things like safety and expediency, which

1 were key countervailing factors at this time that the
2 Commission really needs to consider and I think properly
3 does consider in its -- in its analysis of some of our
4 programs.

5 And Mr. Finkelstein keeps citing to a failure
6 to meet standards and that SDG&E should have done more
7 to prove its case. And I will say there are thousands
8 of pages of evidence in the record in this proceeding
9 and -- but what Mr. Finkelstein advocates for is
10 application of today's standard on cost-effectiveness,
11 like CBRs and multiple -- multiple cost-alternative
12 analyses as opposed to what was in effect at the time,
13 which were the use of RSEs. And the fact of the matter
14 is -- is that SDG&E's WMPs contain references to the
15 RSEs of each and every applicable program that had an
16 RSE at the time. And those were used by both -- by
17 Energy Safety to asses both the effectiveness of the
18 program at reducing miti -- reducing wildfires but also
19 the overall cost-effectiveness. That was one part of
20 their analysis as well.

21 And so to -- and I'll -- but on top of that,
22 the record does contain alternatives analysis. On
23 drones, in particular, I'll point you to Exhibit
24 SDG&E-T2-ALJ-05 in which -- which is SDG&E's 2023 to
25 2025 WMP, which talks about the effectiveness of drones

1 versus ground-based inspections and the disadvantages of
2 that, and those are addressed in our comments as well.
3 And so SDG&E was providing and did provide in this case
4 significant analyses of the cost-effectiveness of each
5 and every one of its programs.

6 And on the Crowe audit, in particular, I
7 think -- you know, there was extensive discussion during
8 the hearings in this case and during the briefing in
9 this case about the Crowe audit and what it really
10 looked at, which was a point in time in 2020 in which
11 Crowe, who performed a performance audit, which is not
12 like a financial audit -- there's a -- it does a
13 performance audit of certain things to say that
14 ultimately the Commission should, when SDG&E comes and
15 asks for review -- or recovery of costs the Commission
16 should hold them to the -- to a standard to prove
17 incrementality, to prove reasonableness, to prove that
18 there is no double-recovery.

19 And throughout this proceeding, that is exactly
20 what SDG&E has done through a comprehensive exhibit, as
21 requested by ALJ Larsen, to show at the initiative level
22 the incrementality of each and every -- of each and
23 every spend by WMP initiative and mapping that back to
24 our au -- to our GRC-authorized and also by providing,
25 at least through data requests, the entirety of our line

1 item detail on these issues.

2 And so to that end, SDG&E embraced that
3 challenge, and they have provided that and also through
4 the Ernst & Young, which is also in the record of this
5 case, which found that almost all of SDG&E's costs were
6 reasonable and incremental, more important for that, for
7 this purpose incremental and that SDG&E agreed that the
8 extrapolated amount that was not incremental should be
9 removed. So for that reason -- and so SDG&E removed
10 that from its request.

11 And with that, thank you, your Honor. If there
12 are any questions, we'll be happy to address them.

13 ALJ LARSEN: All right. Thank you.

14 All right back up is Cal Advocates.

15 REBUTTAL ARGUMENT BY MR. CAMPBELL

16 Thank you. I'll be even more brief. So in
17 terms of the initial comments there and focusing on
18 incremental, again, that misses the point of what I was
19 trying to say. Just booking it into a memo account and
20 saying, This is a thing we didn't do, that still isn't
21 enough to force ratepayers to pay more. They need to
22 show that that was reasonable for additional rate
23 recovery. And those were the points that I was making
24 before. So I feel like -- actually, appreciate it, but
25 it didn't -- it didn't talk about reasonableness. I

1 feel like they are helping me.

2 The other point I would just emphasize, what my
3 colleagues were highlighting, which is just pointing to
4 and making this case -- SDG&E keeps pointing to, you
5 know, Hey, look at our WMP. We did stuff in the WMP.
6 Give us the money. That's not what we're supposed to be
7 doing in a reasonableness review. You are supposed to
8 be doing a very clear review of what the activities
9 were, how they may or may not have been different from
10 what was already approved in the budget, you set in the
11 general rate case. That's the incremental part and then
12 is it reasonable for rate recovery. And they have to be
13 able to document and demonstrate that, and I think the
14 record is very clear here that -- and here is where
15 the -- that -- highlighted here that that was inadequate
16 and the disallowances are appropriate.

17 And it's -- it's not a -- I'll just -- I'm
18 sorry. I can't -- I was going to be done now, but I
19 can't resist it. I would just point out that at the
20 same time that this legislation was being passed in that
21 same legislation there was an opportunity for penalties
22 that the legislature put forward because they were
23 concerned about the consideration of double-recovery.

24 And that's in 451.3 that says that if a -- if
25 the Commission were to find the utilities requesting

1 costs already authorized up to three times that request,
2 as prescribed in PU Code 451.3, was authorized in terms
3 of being a penalty, if you were to find that those costs
4 were -- if they're seeking double-recovery here. So
5 I -- so that's what a penalty looks like, not
6 disallowance.

7 ALJ LARSEN: All right. Thank you.

8 TURN.

9 REBUTTAL ARGUMENT BY MR. FINKELSTEIN

10 Thank you, your Honor. A couple of points.
11 First, San Diego's claim that TURN's been trying to hold
12 the utilities to a higher standard than is warranted.
13 TURN long ago gave up on holding the utilities to a
14 higher standard. It doesn't get you anywhere. We're --
15 we're trying to hold them to the standard -- the prudent
16 manager standard as it has existed for a long time as
17 the Commission's been describing it in decisions since,
18 I think, 1989, at least 1992. This notion that it's a
19 new thing for the utility to have to think about
20 cost-effectiveness or cost minimalization, those are all
21 things that have long departed the standard. And that's
22 the standard that we're applying here.

23 San Diego is not some unsophisticated utility
24 that in 2019 started spending on wildfire mitigation
25 work and later came to the realization, Oh, we need to

1 demonstrate reasonableness. They had to have known that
2 from the very beginning, and they failed to make a
3 showing that that part of their decision making was
4 itself reasonable. It's just not in here. So this
5 notion that, "We did everything right," "We've avoided
6 wildfires," true, great. That's not a substitute for a
7 cost reasonableness showing, and that's part of the
8 prudent manager standard as it has existed for a long,
9 long time.

10 San Diego's point that they calculated a risk
11 spend efficiency number for all of its initiatives, as
12 the Commission has recognized -- as we've addressed in
13 brief, as the Commission has recognized, the calculation
14 of an RSE value for a single initiative tells you
15 nothing about the cost-effectiveness of that initiative.
16 It's only when you start to compare things to each
17 other. It's only when you take a potential for
18 undergrounding and compare it to what the cost would be
19 and what the risk reduction would be if you did covered
20 conductor instead. That kind of comparison was enabled
21 through calculating an RSE for each of them and
22 comparing them. There's nothing in the record to show
23 that San Diego did that. It just doesn't show up.

24 So calculation of an RSE, we don't dispute
25 that. It's not a demonstration of cost-effectiveness

1 that would satisfy their burden here. I don't quite
2 understand how what PG&E's said in a 2023 to 2025
3 Wildfire Mitigation Plan document demonstrates what the
4 utility knew or should have known or told anyone for the
5 2019 to 2022 period that we're dealing with here.

6 So the notion that PG&E has done better with
7 its explanation on the drone program starting in 2023,
8 you know, I don't have a basis for challenging that.
9 It's just highly irrelevant to what's before the
10 Commission in this proceeding.

11 Do not call the Ernst & Young review an audit.
12 It was not an audit. We have it in pleadings. We have
13 it in our comments. I'm not going to belabor it here.
14 There is -- I will belabor one thing. The risk that if
15 you call it an audit in the future someone is going to
16 point to this kind of review -- this kind of analysis
17 and say, See, that's an audit. And we're going to be
18 stuck with it. So you need to be very, very careful
19 about your nomenclature in this instance.

20 And on the question of incrementality, I would
21 just urge you to remember that it is at least a two-step
22 process. It's not just whether or not it's a new
23 activity that wasn't contemplated in a general rate case
24 decision. It's not doing more of that activity that
25 then was contemplated in the GRC decision. It's also

1 got to be that the utility was required to devote new
2 incremental resources in order to get the additional
3 activity done, and that part of it is cited correctly in
4 the introductory portions of the proposed decision.

5 In our view, the proposed decision dropped the
6 ball and needs to be clarified as it applies that
7 standard to a couple of specific initiatives, but its
8 incrementality is going to be with the Commission for a
9 while longer. And you've got to get it right. So it's
10 really important to remember that it is at least a
11 two-step process. It's not just simply was it in the
12 GRC? If not, it's therefore incremental. That's --
13 that's not right. Thank you.

14 ALJ LARSEN: All right. Thank you.

15 PCF.

16 REBUTTAL ARGUMENT BY MS. WHITE

17 SDG&E uses the threat of wildfires to argue for
18 unjust and unreasonable costs. Everyone agrees
19 wildfires should be prevented, but how cost efficiently
20 SDG&E does so is an essential consideration. SDG&E is
21 not entitled to cost recovery merely because it
22 possesses an approved WMP. The Commission stated in
23 D.19-05-036 that Senate Bill 901 is explicit that
24 approval of wildfire mitigation plans does not
25 constitute approval of the costs associated with the

1 actions in the plan, rather cost recovery is a separate
2 matter addressed in each utility -- each utility's
3 general rate case.

4 Since its implementation in 2019, Section
5 8386.4 has required that the Commission only implement
6 costs which it determines are just and reasonable.
7 Therefore, the Commission is obligated to deny any
8 unjust and unreasonable costs regardless of whether they
9 were included in the WMP. The PD correctly denies most
10 of SDG&E's drone inspection costs. The PD correctly
11 found that SDG&E hastily implemented an expensive and
12 untested technology without determining how to use the
13 technology cost effectively. SDG&E did not establish
14 that its drone costs were not redundant of other
15 inspection programs.

16 The PD correctly found that much of SDG&E's
17 drone inspection costs appear to be for processing of
18 the data collected by drones. As TURN points out, SDG&E
19 only asserts in its opening comments to this PD that the
20 costs are for repairs but does not provide any source.

21 The PD correctly denies SDG&E's drone
22 inspection costs because SDG&E's failure to provide any
23 documentation or evidence to establish their drone costs
24 are related to repairs, and its last-minute assertions
25 in its opening comments do not constitute evidence.

1 The Commission also found that SDG&E's
2 testimony and application was so deficient that it
3 required SDG&E to file supplemental exhibits twice.
4 SDG&E's first supplemental exhibit failed to show which
5 funds were diverted to which programs and why. The
6 Commission cannot evaluate the reasonableness of why
7 SDG&E overspent and underspent because SDG&E never
8 explained why, and therefore, the concerns of the audit
9 were not satisfied.

10 The second set of supplemental exhibits filed
11 six months after the close of evidentiary hearings
12 failed to establish that SDG&E had addressed the
13 concerns identified by the Commission in OEIS. Further,
14 PCF's request to examine witnesses about that
15 supplemental exhibit was denied. The PD fails to
16 account for the numerous deficiencies in SDG&E's
17 showing. The PD must be revised to hold SDG&E
18 accountable for the deficiencies which the PD and OEIS
19 found. There's no reason to rush the authorization of
20 the 1.035 billion in spending before the Commission can
21 ensure that each and every cost is just and reasonable.
22 Thank you.

23 ALJ LARSEN: All right. Thank you.

24 We will now turn to questions from the
25 Commissioners, and who would like to start?

1 Commissioner Houck? Okay. Go ahead.

2 COMMISSIONER HOUCK: Thank you, Judge Larsen.

3 So first I want to address SDG&E, and then the other
4 parties can also respond. But I do think, you know,
5 it's almost like we're kind of talking past each other
6 here as to what we're talking about. I don't think
7 anyone's questioning that legitimate and safety costs
8 should be recovered, but you know, this is a
9 reasonableness review. And we are looking at costs that
10 have gone over what was previously authorized or that
11 are set out in the memorandum account. And I do think
12 the parties have raised some real concerns that are
13 reflected in the PD regarding how these costs are broken
14 out. Just a flat dollar amount for each line item from
15 the WMP really isn't sufficient for us to do our
16 prudence review. And the burden is on SDG&E to show
17 that these are reasonable costs.

18 And so, you know, in the comments to the
19 proposed decision, SDG&E stated -- and I believe it was
20 for the first time in the proceeding -- that its drone
21 program cost increased because its inspection cost
22 included remediation. And so there was no breakout of
23 the remediation and repairs from the actual inspection
24 cost. The information was provided without a citation
25 or a calculation.

1 So I don't know where, if at all -- it doesn't
2 appear to be information that's actually in the record,
3 and I'm concerned that, you know -- this is just an
4 example. I know in the Phase 1 -- and I understand it
5 wasn't SDG&E. It was SoCal Gas -- we dealt with a
6 similar issue with the Adelaide pipe -- gas pipe
7 replacement.

8 And so in the comments to the PD -- again, not
9 on the record but in comments on the PD, SDG&E stated
10 that 66 point million -- \$66.6 million in capital costs
11 and 69.5 million in O&M are, quote, "entirely related to
12 necessary repairs resulting from the inspections." So
13 this amounts to roughly \$136.1 million or 62 percent of
14 the drone cost recovery requests.

15 So I guess one of my questions is why weren't
16 these costs broken out in a way that, in the record,
17 prior to getting to the decision that could be analyzed
18 to demonstrate whether -- and for other parties to
19 respond as to whether these were prudent costs or not?

20 And so I guess I'm just trying to understand
21 how the application and the testimony were prepared that
22 it didn't break out the costs so that we could do a
23 proper analysis given the burden is on SDG&E here?

24 MR. GERAGHTY: I'm going to tag-team with
25 Ms. Fulton on this one. To the extent any application

1 we made didn't include a breakout to where those could
2 be discovered without back-and-forth DRs or discovery on
3 the record, I think that's a lesson to be learned, but I
4 think throughout the course of the examination of this
5 cost and thousands and thousands of pages of information
6 that our drone programs did include repair costs
7 associated with them. If the record does not speak to
8 that, we think -- I should say if the application
9 didn't, we think the record does speak to that. Right?

10 And I would say that if there's something that
11 we've learned, obviously a significant line item -- an
12 expense like that should not come in a single line item,
13 but I've been in utility proceedings for a long time,
14 and often discovery in this process is what leads to
15 more details about the cost and that we're being
16 questioned about those at this point is certainly a
17 lesson learned for us to think about how we file that
18 going forward.

19 For any further detail, Laura, do you want to
20 add something?

21 MS. FULTON: Thank you. Just briefly, I think,
22 in the description of the DIAR Program, I mean, it's in
23 the name. Drone Inspection and Repair?

24 MR. GERAGHTY: Assessment.

25 MS. FULTON: Drone Assessment and -- Drone --

1 Whatever. Repair's in there. And the -- I think the
2 point of that is, you know, throughout the description
3 of the programs, which are in the record, extensively
4 we're talking -- SDG&E discusses the repair work
5 including the number of findings. You know, I think
6 in -- in the record is that there were exponential
7 number of findings from the DIAR Program over the --
8 over the -- over ground-based inspections and
9 alternatives.

10 But in -- the way that SDG&E budgets, it has
11 one budget code for this program that includes
12 assessment and repairs. That is also how it was
13 forecasted in SDG&E's 2024 rate case.]

14 And so, it's consistent with how it was
15 provided, you know, in the -- throughout the WMP cycle
16 but the Commission approved it with -- together,
17 inspections and repairs not broken down in the -- in the
18 GRC forecast.

19 So, I think Mr. Geraghty is right. It's a
20 lesson learned perhaps that, you know, in future cases,
21 but the -- it wasn't hidden from anyone, and it is clear
22 in the record that this included repairs and this is
23 just SDG&E's accounting practices reflecting the total
24 cost of the program. That may be different from how
25 PG&E or how -- how PG&E records their costs, but that

1 doesn't make it unreasonable; and so, if the Commission
2 wants -- wants to see that going forward, that's --
3 that's a reasonable thing to ask for to break those
4 accounting practices down in the future, but again, this
5 is how -- this was consistent with how our programs were
6 authorized in 2019; and so, we -- we maintain those
7 practices based on what we knew or should have known at
8 the time.

9 COMMISSIONER HOUCK: So, I -- I guess, do you
10 see a difference between, you know, the analysis you
11 described in looking at a future forecast and looking at
12 those costs versus an after-the-fact looking back
13 reasonableness review where you know how you spent those
14 dollars, why it would be reasonable for us to expect
15 that there would have been a better breakdown of that
16 when we're looking at whether the costs actually
17 incurred were prudent as opposed to you providing a
18 description of your program with what the estimated
19 dollars are for a future-looking forecast?

20 MS. FULTON: I -- I think -- I think with --
21 again, with hindsight, it's great to have the benefit of
22 that to understand what -- what we should have shown
23 and, you know, some of this is available in the line
24 item detail that -- that we provided in discovery for --
25 for every budget code -- every single cost for every

1 budget code.

2 The question is these -- the way SDG&E tracked
3 its accounting progress, so it's a question of from an
4 accounting perspective. At the time, we did it
5 according to how it was authorized track -- tracking
6 alongside the rate case; and so, is it -- when you're
7 looking at that, we -- we presented costs by budget
8 code, which is -- and those budget codes are associated
9 with WMP initiatives, and because of that, that -- I
10 think the break -- further breaking down those costs is
11 possible but the one, I -- I know Commission Houck, you
12 referred to it as one line, but it is -- it is
13 reflecting the total cost, and -- and the description of
14 everything including in those costs. I think the
15 question is, it's clear that it's an apples and oranges
16 comparison when you look at the -- at the description of
17 the program. And so, I -- that's why I think from --
18 it's a question of we -- SDG&E did this based on its
19 practices at the time and accounting codes to make sure
20 that it was aligned with its WMP initiatives.

21 I -- I think looking -- that's why, you know,
22 all three utilities have slightly different practices on
23 how they record -- record projects and -- and make their
24 forecasts. This is how SDG&E did it at the time and
25 this is also, again, how it is -- how it's reflected in

1 the forecast.

2 More transparency is probably always a good
3 thing, right, more -- more clarity, but it gets to a
4 point also where there's probably a -- a -- an
5 unreasonable burden on providing everybody single
6 receipt, but it -- I mean, that -- that is true in this
7 case, and parties had the opportunity to review every
8 single cost, line item by line item and -- and assess
9 those individually.

10 COMMISSIONER HOUCK: Yeah, but the burden, I --
11 I think, was still yours, and even getting to point of
12 not having it broken down between O&M and capital
13 expenses, I -- I think, was it --

14 MS. FULTON: It -- it was broken down by O&M
15 and capital.

16 COMMISSIONER HOUCK: But regardless, I think
17 the burden is on SDG&E, so it would have -- I am not
18 going to belabor it, but I --

19 MS. FULTON: If I can have one point, I -- I
20 just -- there have been a number of reasonableness
21 reviews of incremental wildfire costs for all of the
22 utilities at this point, and the Commission has
23 recognized that -- that use of -- of -- it is not -- I
24 don't -- I think that is a standard, honestly, that is
25 -- that is beyond what has been applied in any other

1 reasonableness review to date.

2 I mean, I -- I embrace the burden and SDG&E
3 embraces the burden that we do have to prove, especially
4 given this is a -- there's a large magnitude of costs at
5 issue here, and we do not -- we take that very
6 seriously; and in embracing that burden, I think we have
7 met that consistent with any other standard that's been
8 previously applied, and that includes using the
9 incrementality analysis exactly the same that was cited
10 to approve PG&E's costs by -- by retaining a firm to
11 perform the same type of audit, the -- the exact same
12 review that was done in PG&E's case that the Commission
13 cited to in support of approving PG&E's incremental
14 wildfire costs.

15 COMMISSIONER REYNOLDS: In listening to your
16 answer, I just was -- was contemplating, I think, much
17 the same, again, as Commissioner Houck was indicating in
18 her question that I don't think the question here is
19 simply about the accounting practices. It's about
20 whether or not you've demonstrated the reasonableness of
21 these specific costs that have been incurred and that
22 you're seeking recovery for through this memorandum
23 account; and I think, you know, I appreciate
24 acknowledgement of lessons learned through this process.

25 As -- as a energy utility, you've been through

1 this process many different times for many different
2 memo accounts, and I appreciate that every litigation is
3 a little bit different; nonetheless, I think when
4 parties raise concerns about whether or not certain
5 categories of costs are reasonable, and we don't get a
6 complete demonstration of why those -- those costs are
7 reasonable until comments on the PD is certainly --
8 certainly concerning.

9 I am happy to hear any response to that.

10 MS. FULTON: I appreciate your -- your
11 position, Commissioner, I think that's reasonable. I --
12 I do think there's a -- a fair bit in the comments that
13 is all within the record. I understand that the
14 breakdown of the drone -- the specific breakdown of the
15 inspection and repairs may not be entirely reflected and
16 -- and maybe we could have done better on that front.

17 But at this point, there's no -- I think
18 the burd -- the concern for SDG&E is that the burden on
19 a reasonableness-like review -- and we have followed
20 other proceedings that have -- that have occurred for
21 the other utilities, I think this is a higher standard
22 to provide this level of detail, exact figures.

23 I know SCE -- SCE in their review has a -- a
24 much, like, larger, I think it was like a bulk acc -- a
25 bulk account demonstration of incrementality that the

1 Commission found reasonable in many instances; and so, I
2 think that it is -- it would be setting new precedent in
3 a new -- in -- in this wildfire mitigation recovery
4 proceeding to go a step further. And -- and that's what
5 we have said that TURN has been asking from the
6 beginning of this case is -- is -- we -- SDG&E accepts
7 the high bar that exists for an after-the-fact
8 reasonableness review, but the bar should not be placed
9 higher than it has been in the past. It needs to remain
10 consistent with Commission precedent, and -- and that is
11 why we can -- we can go -- going forward, this is
12 something that we could -- that we can demonstrate, but
13 to the -- to that fact, drone inspections at the DIAR
14 program, which is now slightly revised to be RIDI, is
15 a -- was for -- was -- was forecast in the exact same
16 fashion that it was reflected in this case. Inspections
17 and repair costs, O&M and capital, the workpapers
18 reflect all of that, and the Commission approved that in
19 its entirety. Not only that -- and -- and I guess I
20 will jump to this other point.

21 Not -- not only that is -- and cited to
22 the strength of the drone program, it highlighted, it
23 was a -- it was a feature of our GRC decision and
24 specifically called out as a good thing about the rate
25 case in that it would foster more use of drone

1 inspections to reduce wildfire risk, and what's -- the
2 problem here is -- aside from the accounting issues,
3 that -- which is -- there -- there's -- there are, you
4 know, ways that -- that we can all argue SDG&E could
5 have better reflected the costs, but to go to zero and
6 not only that, to say that the program should have been
7 discontinued in 2020 runs afoul of the WMP approval.

8 The fact that SDG&E had targets -- compliance
9 targets that it had to reach to attain these goal --
10 to -- to maintain compliance with its WMP, to implement
11 its WPM, to keep and maintain its safety certification,
12 and those thing are -- to say that the program should
13 have been stopped is a different question entirely, and
14 I think that's the more concerning issue here is that
15 these programs -- most of the disallowances in this PD
16 go to zero, which say not only did you not reflect the
17 costs accurately, did you not -- did you not, you
18 know -- did you spend a little bit -- did you spend more
19 than you should have to achieve this goal? It is to say
20 you shouldn't have done the work at all; and that just
21 runs -- for drones in particular and for PSPS
22 communications, which were all to achieve -- which were
23 primarily to achieve Commission requirements and help
24 our customers during these emergency conditions, is to
25 say it -- it's -- it boggles the mind and just runs

1 afoul of the entirety of the construct that was put in
2 place through SB 901 and AB 1054, and that's the concern
3 here.

4 COMMISSIONER HOUCK: Judge Larsen?

5 I just want to say that I don't think -- I -- I
6 think by going to zero, it's not saying the work
7 shouldn't have been done; it's saying that you needed to
8 meet your burden and you needed to show how the money
9 was spent so that we can make a reasonableness finding.
10 Those are two different things; and so, I -- I just want
11 to make that clear that that -- that was the concern
12 here is that it wasn't shown how the money was spent and
13 why it was reasonable.

14 It wasn't that we were saying the programs were
15 unreasonable or that you shouldn't have done the work,
16 so, I -- I just think it's important that we are in an
17 affordability crisis. We need to be able to do the math
18 and show the ratepayers why the -- the money is
19 expensive. Safety is obviously a priority, but we need
20 to be able to know how the money is being spent, and
21 that in -- and be able to show the incrementality and
22 the other things, so I just think it's important that we
23 are really clear here. This isn't saying the work
24 shouldn't have been done. It's saying that we needed to
25 see a better accounting for you to be able to show why

1 those specific costs for what that money -- for what the
2 money was spent for were prudent.

3 And I -- I don't know if other parties want to
4 respond to anything in this discussion briefly, Judge,
5 if that's okay.

6 ALJ LARSEN: We have allowed that in previous
7 oral arguments, but maybe we should go to finish the
8 questions?

9 COMMISSIONER REYNOLDS: I would be interested
10 in hearing any responses while we are on this topic.

11 ALJ LARSEN: Okay, go ahead. You could speak
12 from the table down there.

13 MR. FINKELSTEIN: I am hoping that is not a
14 concession to age, your Honor.

15 I don't have much to add from the comments that
16 we've heard from the two commissioners that were asking
17 the questions and -- and probing these issues.

18 I -- this isn't a lessons learned moment for
19 San Diego. This is what San Diego had to have known
20 going into these activities, knowing that it was going
21 to have a memorandum account and knowing that it was
22 going to have to establish the reasonableness of its
23 spending on an after-the-fact basis.

24 None of this is new. None of is this a lesson
25 that San Diego shouldn't have known but can take forward

1 into Track 3 and beyond. It is the prudent manager
2 standard in action as applied to wildfire mitigation
3 costs, and that's how it was intended to be.

4 I just -- I think you put your finger on it
5 that how can San Diego possibly have thought it was an
6 adequate showing on its drone costs if it didn't bother
7 to split out the repair and replacement costs that
8 represent, it sounds like, something in the order of
9 60 percent of the recorded costs that it's trying to
10 recover here.

11 To not even call that out and just have a
12 single line item for the drone program is a troubling
13 sign, and it's not just this program. I urge you to
14 look at those tables in the wildfire mitigation plans.
15 It is one line per initiative, and it's not informative
16 at all.

17 These claims that you're holding them to a
18 different standard for the utilities, I -- I don't know
19 that that's true. It is true that you let Edison off
20 the hook for an inadequate incrementality showing, in
21 our view, but you did include in the decision, going
22 forward, this is the right way to do incrementality, so
23 we're -- we're trying to focus on that going forward
24 part from that decision, and that's a decision that San
25 Diego should have known about as it was putting together

1 its showing here.

2 I will leave it at that for now.

3 Thank you.

4 MS. WHITE: If I could also add to your points,
5 Bob.

6 So, I just want to emphasize that under
7 Section 463(b), if SDG&E fails to prepare or maintain
8 records sufficient to enable the Commission to
9 completely evaluate the reasonableness of its costs,
10 then those costs must be denied.

11 And so, the PD found, based on the available
12 information, that SDG&E's drone inspection costs appear
13 to be for processing of the data collected by drones,
14 and it's only in opening comments on this PD that SDG&E
15 is now claiming that the costs relate to repairs.

16 So, I think it's very clear SDG&E did not
17 provide sufficient documentation or evidence to
18 establish the reasonableness of its cross.

19 MS. FULTON: Can -- can I make two points? I
20 will be very brief.

21 ALJ LARSEN: Okay.

22 MS. FULTON: The first is subject to check.
23 The PD should at least be revised to reflect what
24 Commissioner Houck is saying that we did not, because it
25 -- it clearly says that the program should have been

1 disc -- the drone program should have been discontinued
2 in 2020.

3 And the second point is, I think
4 Mr. Finkelstein perfectly illustrates how we are
5 applying standards that SDG&E did not know at the time
6 to its conduct by citing to an Edison decision that came
7 out after we submitted the evidence in this case.

8 And so, the -- the goalpost moving after the
9 fact, SDG&E can't show up to a football game and then be
10 told we're playing rugby. It is -- it is not -- it is
11 moving the -- the disc -- it is moving the standard in
12 realtime; and so, to -- to hold us to that standard is a
13 clear violation of what is long -- what has been
14 longstanding Commission precedent that in a
15 reasonableness review, we are looked at by what we knew
16 or should have known at the time, which is 2019 to 2022
17 in this case. Before the Edison decision.

18 ALJ LARSEN: I think we should go to another
19 question --

20 MS. FULTON: Okay.

21 ALJ LARSEN: Did the commissioner have another?

22 COMMISSIONER HOUCK: I think Mr. Campbell
23 wanted to make a comment.

24 ALJ LARSEN: Okay.

25 MR. CAMPBELL: Yeah, I will just get my two

1 cents in here, too. It's really hard to say anything
2 more, too, than the commissioners have already but,
3 obviously, spending a lot of time on this, it's
4 something that is worth a lot of money to the utilities
5 why they're -- they're hanging on it, but they -- they
6 are very smart. They've got a lot of smart, competent
7 people both on the wildfire side and the regulatory
8 side.

9 They know what \$126 million is worth. They
10 know what a reasonableness review is. They can read the
11 statute. They know what your obligation is in terms of
12 reviewing it.

13 So, they have either chosen to not present that
14 here in this case, or they inadequately tracked it, and
15 the -- the poor team trying to put it together had
16 nothing to give you.

17 Either way, that's not your problem. That's
18 not your problem to solve, and it's -- and the showing
19 there isn't sufficient.

20 Thank you.]

21 ALJ LARSEN: Okay. Is there any other
22 questions?

23 Commissioner Houck, do you have another
24 question?

25 COMMISSIONER HOUCK: Just one question for PCF.

1 In regards to your incrementality argument,
2 what information would satisfy the incrementality
3 standard you argue is lacking in the proposed decision,

4 And, then, is it your position that SDG&E has
5 simply not provided sufficient evidence to determine
6 whether the cost needs a more nuanced incrementality
7 standard or that the evidence actually indicates the
8 costs are not incremental?

9 MS. WHITE: Thank you, Commissioner Houck.

10 That's a good question. I think one issue PCF
11 has is that when SDG&E overspends, it claims that its
12 costs were incremental, but, then, when SDG&E
13 underspends, it claims that it is not obligated to
14 follow the cost categories and what it said it would do
15 in the 2019 GRC and that it's allowed to reprioritize.

16 So what I think really needs to happen is the
17 PD needs to be revised to take a closer look. It needs
18 to ensure the discrepancies, which PCF identified,
19 are -- it needs to ensure that the discrepancies are
20 explained and that SDG&E is able to identify the correct
21 number, and then it also needs to ensure that -- the PD
22 needs to be revised to explain where exactly the
23 underspent money from the 2019 electric distribution
24 capital went because SDG&E never explains in its
25 supplemental exhibit where -- where exactly the funds

1 were diverted and why.

2 So I think to establish incrementality, we
3 would first need to know where exactly all of SDG&E's
4 approved costs in the 2019 GRC are being accounted for
5 now.

6 Thank you.

7 ALJ LARSEN: Okay. Commissioner Houck, any
8 more questions?

9 COMMISSIONER HOUCK: No.

10 ALJ LARSEN: Okay. Why don't we go down the
11 line and see if there are any more questions.

12 PRESIDENT REYNOLDS: I wanted to ask a little
13 bit more about data governance, along the same lines as
14 the conversation we've been having with respect to
15 drones.

16 And, Mr. Geraghty, do you want to address the
17 evidence supporting data management, reasonableness of
18 costs.

19 MR. GERAGHTY: I want to be really very clear
20 because I first had said, "lesson learned," it applied
21 to what actually went in the application.

22 I think it's really very clear that we think
23 the record -- 5,000 pages, all the hours -- clearly
24 identifies those costs associated with the drone
25 program. One-hundred percent it's easy to point to a

1 single line in an application, but that's not the case.

2 I think data governance is in a similar
3 fashion. That if all we did was put a single line and
4 that's what's in the application, it makes it very easy
5 for intervenors in the case to say that "you just
6 explained a very complex data governance deal in a
7 single line," but I don't think that's what the record
8 established. I think the record makes it really very
9 clear all the intense requirements from OEIS in creating
10 that data governance.

11 PRESIDENT REYNOLDS: And if the intervenors
12 want to respond.

13 MR. FINKELSTEIN: Thank you, President
14 Reynolds.

15 I'm trying to think of the right way to say
16 this, but I think it's incumbent upon the Commission to
17 apply a pretty strict trust-but-verify approach on these
18 things that San Diego represents what's in the record
19 and what's not. It is thousands of pages.

20 To my view, it is thousands of pages of largely
21 a nothing burger for the issues that matter to this
22 reasonableness review. And I have tried to verify some
23 of the claims about what's in the record that we said is
24 not in the record, and I've not been successful in
25 tracking it down.

1 So I'd urge you to be very, very cautious about
2 accepting, just based on representations now, that it's
3 in the record, it's in enough detail, and it was there
4 for intervenors.

5 Ask for verification of that because it's
6 entirely possible that, you know, I've missed things,
7 others have missed things. We all have lives that we
8 try to get back to on occasion.

9 So trolling thousands of pages of documents to
10 see if there's a further reference to a cost breakout
11 that we missed the first time, yeah, we might have
12 missed it again, but I'd urge you to make sure that
13 these representations actually reflect what is in the
14 record.

15 MR. GERAGHTY: On data governance, I think the
16 evidence on whether the data -- data governance program
17 is effective is the filings we have to make to OEIS, the
18 numerous filings we made to the evidence that actually
19 was performed is clear in the record. The evidence that
20 it was not -- that it is incremental is clear because
21 those requirements were not in the 2019 GRC.

22 So, again, I believe the record makes that very
23 clear; however, it sounds like we could improve in our
24 application process such that somebody doesn't miss
25 that, and I appreciate the recognition that through

1 \$5,000 pages of a record someone may have missed there
2 was the absolute evidence that data governance was
3 required post-2019. It was extreme, and SDG&E
4 experienced costs related to it.

5 PRESIDENT REYNOLDS: Sure.

6 MR. FINKELSTEIN: Just very quickly, the answer
7 is not to say, we need to do a better job of pointing to
8 the details in our 5,000-page record.

9 The answer is we need to come up with a
10 100-page document that actually has highlighted specific
11 information that we were supposed to present in the
12 reasonableness review, rather than submitting 5,000
13 pages that might contain that information.

14 PRESIDENT REYNOLDS: Thank you.

15 ALJ LARSEN: Commissioner Douglas?

16 COMMISSIONER DOUGLAS: Thank you.

17 I just wanted to ask if you have any more
18 detail to add on the community outreach side of the
19 application and the app that was developed, and is there
20 a detailed cost breakdown of the cost of the app versus
21 the actual outreach that was done and the uses to which
22 the app was put?

23 MR. GERAGHTY: I believe the record is really
24 very clear that all the costs in that bucket did not go
25 to an app. All right. The app was a minor percentage

1 of that spend. So we believe in the course of the
2 record, it was made really very clear what went to CRCs,
3 which went to communications, which may have gone to
4 CBOs and AFNs, and all those other things.

5 So it's clear the app itself, 117,000 users --
6 it's intention was really for customers, who we may not
7 normally be able to communicate, and the drive of that
8 came actually like a 1054 hearing. There are customers
9 behind the meter who do not get a bill from SDG or a
10 phone call from SDG; there are visitors in Air B&B.

11 These are the things that we talked about, but
12 that app itself, 117,000 users. We know it's very
13 effective. And its genesis was through discussions here
14 and 1054, but I fear that it falls prey to the same
15 discussion that you have a single line in the
16 application explaining those dollars. Maybe in many
17 cases our teams relied on those that are absolutely
18 carefully and painfully explained in WMP applications.
19 Maybe our teams made that error, but I think the record
20 clearly details all of those things that make that
21 bucket up.

22 ALJ LARSEN: Can you say or can anyone on your
23 team say where it is in the record, how much you spent
24 on the app?

25 MR. GERAGHTY: I would have then turn to

1 experts in the room to know precisely where it's at if
2 we have that here.

3 MR. WOLDEMARIAM: In the exhibit there was line
4 items that we were asked to give, through the ALJ
5 exhibits that we provided, almost at the end of the
6 Track 2 hearings, and we provided breakdowns of the
7 various activities, line budget code.

8 And in there, there's the PSPS app and the ENS
9 enhancements. So there's two items, but those are the
10 costs that are associated, about \$9.8 million for those
11 two activities of which somewhere around
12 five-million-plus is for the PSPS app.

13 ALJ LARSEN: Do you know the exhibit number?

14 MR. WOLDEMARIAM: 12. Exhibit 12, I believe.

15 ALJ LARSEN: ALJ Exhibit 12. Do you have the
16 page number?

17 MS. FULTON: I think it's 09, your Honor.
18 SDG&E T2-09, but subject to check. I'll confirm that
19 right now.

20 COMMISSIONER HOUCK: Is that one dollar amount
21 for the entire community engagement program or does it
22 break out the actual cost for the app and all of the
23 items for the community engagement?

24 MR. WOLDEMARIAM: It breaks down all the items
25 for the community engagement, and then there's a line

1 item there for the PSPS app and ENS enhancements, so
2 there's two things on that one line item.

3 ALJ LARSEN: I'll just have to say that this is
4 an example of a disconnect and as people are talking
5 past each other. If somebody had to write this
6 decision, there's no way I would know that from looking
7 at your -- from your showing. It's impossible write a
8 decision based on the way you have your testimony
9 organized.

10 And in many cases, there's no reference to a
11 workpaper, and that, that's not even a workpaper, that
12 document you're talking about. That's something I
13 asked -- we asked for after the fact and after your
14 record was found to be deficient. So that's a good
15 example of the problems we're looking at.

16 Commissioner Douglas, do you have any other
17 questions?

18 COMMISSIONER DOUGLAS: No.

19 ALJ LARSEN: Commissioner John Reynolds?

20 COMMISSIONER REYNOLDS: No.

21 ALJ LARSEN: President Reynolds?

22 PRESIDENT REYNOLDS: No.

23 ALJ LARSEN: It's approximately 2:51. That
24 concludes the questions, and we are ready to adjourn.
25 So thank you everyone for attending the in-person oral

1 argument. We're off the record.]

2 (At the hour of 2:51 p.m., this matter having
3 been concluded, the Commission then
4 adjourned.)

5 * * * * *

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

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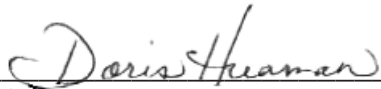

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CSR NO. 14013

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<hr/>	18 4702:16	23 4722:20	<hr/>
\$	180 4726:5	240 4725:19 4726:3,25 4728:12	8
\$10 4700:23	18th 4689:13 4690:6 4693:10	241 4722:19 4723:5	800 4697:6
\$126 4757:9	19 4724:19	2:51 4765:23	826,000 4727:22
\$136 4715:21	198 4690:17	<hr/>	8386.4 4705:25 4739:5
\$136.1 4742:13	1989 4735:18	3	<hr/>
\$137 4715:23	1992 4735:18	3 4710:20 4718:9 4723:16 4754:1	9
\$240 4715:20	1:00 4689:2	30 4691:9 4698:14 4699:14	9 4691:18
\$27 4694:23 4699:3	<hr/>	360 4722:23	901 4726:15 4738:23 4752:2
\$47 4690:16	2	<hr/>	A
\$5,000 4762:1	2 4690:5 4710:20 4717:18 4724:6 4764:6	4	A.22-05-015 4689:7
\$66.6 4742:10	2,000 4699:25	4 4710:24	A.22-05-016 4689:7
\$68 4710:6	20 4710:25	40 4693:25 4710:25 4729:11	AB 4752:2
\$9.8 4764:10	2007 4703:24 4729:1	451.3 4734:24 4735:2	absolute 4762:2
<hr/>	2010 4703:25	463(b) 4721:21 4725:14 4728:5 4755:7	absolutely 4763:17
0	2017 4690:15 4691:20	480,000 4727:25	acc 4749:24
0.67 4722:22	2019 4690:12 4694:5 4700:2 4703:18 4704:3, 18 4715:8 4722:22 4724:10 4726:10,15 4727:10 4728:12 4729:2 4735:24 4737:5 4739:4 4745:6 4756:16 4758:15,23 4759:4 4761:21	<hr/>	accelerate 4692:11
09 4764:17	2020 4694:24 4699:21 4716:11,14 4732:10 4751:7 4756:2	5	accepting 4761:2
<hr/>	2021 4716:11,22	5 4697:8	accepts 4750:6
1	2022 4690:13,16 4694:5 4716:11 4720:15,18,19, 24 4722:22 4724:10 4737:5 4756:16	5,000 4759:23 4762:12	accolades 4693:15
1 4715:9 4742:4	2023 4694:5 4721:17 4724:1,12 4728:8 4731:24 4737:2,7	5,000-page 4762:8	account 4711:25 4712:19,25 4724:9 4728:11 4733:19 4740:16 4741:11 4748:23 4749:25 4753:21
1.035 4721:13 4740:20	2024 4695:11 4718:6 4744:13	500,000 4722:25	accountable 4722:6, 11 4740:18
1.3 4727:19	2025 4689:2,13 4731:25 4737:2	576 4724:11	accounted 4728:14 4759:4
1.6 4727:18	2027 4721:17 4724:1,12 4728:8	<hr/>	accounting 4744:23 4745:4 4746:3,4,19 4748:19 4751:2 4752:25
10 4691:9,19 4728:19		6 4691:19	accounts 4704:24 4705:9,12,16 4706:2,9 4709:6 4729:3 4749:2
100 4695:12		60 4754:9	accurately 4751:17
100,000 4700:24		62 4742:13	achieve 4714:11
100-page 4762:10		66 4742:10	
1054 4692:3 4752:2 4763:8,14		69.5 4742:11	
1054s 4691:25 4693:14 4699:12		<hr/>	
11 4710:22,24		7	
117,000 4763:5,12		700 4722:25	
12 4764:14,15			
15 4689:2 4702:17,20			
17 4710:21			

4751:19,22,23	ADMINISTRATIVE 4689:4	ALJ 4702:17,20,23 4703:1,6,8 4705:17 4711:8 4721:5,7 4728:16 4732:21 4733:13 4735:7 4738:14 4740:23 4753:6,11 4755:21 4756:18,21,24 4757:21 4759:7,10 4762:15 4763:22 4764:4,13,15 4765:3,19,21,23	appears 4715:15 apples 4694:8 4746:15 applicable 4731:15 applicants 4689:17 application 4731:10 4740:2 4742:21,25 4743:8 4759:21 4760:1, 4 4761:24 4762:19 4763:16 applications 4689:7 4763:18 applied 4714:5 4720:17,21 4747:25 4748:8 4754:2 4759:20 applies 4712:17 4714:17 4720:13 4738:6 apply 4710:11 4730:21 4760:17 applying 4693:20,22 4735:22 4756:5 approach 4702:14 4714:16 4760:17 appropriately 4707:2 approval 4694:15 4738:24,25 4751:7 approve 4748:10 approved 4695:8 4722:20,21 4734:10 4738:22 4744:16 4750:18 4759:4 approving 4721:13 4748:13 approximately 4729:11 4765:23 area 4697:11 4699:15 4700:4 4701:22 4709:19 4720:20 areas 4693:12 4694:17 4695:7 4710:21 4711:3 4721:17 4722:15 argue 4707:7 4738:17 4751:4 4758:3 arguing 4699:22 argument 4689:14
acknowledgement 4748:24	admitted 4727:9		
acknowledges 4722:8,12 4723:20 4724:24	ado 4689:24		
acronym 4720:12	adopt 4711:18		
action 4692:18 4754:2	adopted 4718:4,23 4727:2		
actions 4693:19 4739:1	advance 4705:8		
actively 4699:12	advocate 4700:19	allocation 4708:9	
activities 4690:11 4694:10 4695:12 4700:6 4706:5 4707:22 4708:11,12 4734:8 4753:20 4764:7,11	advocates 4689:22 4703:2,10 4708:25 4712:15 4731:9 4733:14	allowed 4699:10 4719:1 4726:12 4753:6 4758:15	
activity 4737:23,24 4738:3	affect 4720:25 4721:1	alongside 4746:6	
actual 4741:23 4762:21 4764:22	affordability 4692:25 4705:20 4706:16 4752:17	alternative 4723:22 4728:7	
add 4709:2 4743:20 4753:15 4755:4 4762:18	AFNS 4763:4	alternatives 4723:6,12 4731:22 4744:9	
added 4710:15 4720:18	afoul 4751:7 4752:1	amount 4710:16 4712:15 4723:16 4725:12 4727:16,17 4729:6 4733:8 4741:14 4764:20	
adding 4696:7	after-the-fact 4690:8 4745:12 4750:7 4753:23	amounts 4691:21 4717:19 4722:22 4724:8 4725:4 4742:13	
additional 4723:8 4733:22 4738:2	afternoon 4689:11,12 4703:5 4711:6 4721:7	analyses 4731:12 4732:4	
Additionally 4727:1	age 4753:14	analysis 4707:21 4722:9 4728:25 4731:3, 20,22 4737:16 4742:23 4745:10 4748:9	
address 4695:16 4724:15 4725:22 4728:24 4730:15 4733:12 4741:3 4759:16	agencies 4725:17	analytical 4720:23	
addressed 4724:7 4732:2 4736:12 4739:2 4740:12	agency 4694:12	analyze 4725:9	
addresses 4717:22 4721:16	agenda 4689:14	analyzed 4742:17	
addressing 4729:25	agree 4704:15 4707:16 4712:11 4719:17	annually 4692:19	
Adelaide 4742:6	agreed 4733:7	anticipated 4704:8	
adequate 4719:9 4754:6	agrees 4738:18	anyone's 4741:7	
adequately 4725:21	ahead 4693:4 4704:12 4741:1 4753:11	app 4701:5,6 4762:19, 20,22,25 4763:5,12,24 4764:8,12,22 4765:1	
adjourn 4765:24	AI 4695:23 4698:2,18	apparently 4708:8	
	air 4696:19 4763:10	appealing 4713:20	
	aircraft 4697:25	appearing 4711:13	
	alerting 4701:13		
	Alice 4721:8		
	align 4727:2		
	aligned 4746:20		

4690:2 4703:4 4711:11 4717:13 4721:6 4728:22 4730:13 4733:15 4735:9 4738:16 4758:1	4725:23 4736:5 awarding 4711:25	bills 4705:10,20 4706:24 4709:3 4710:15	4744:11 4745:25 4746:1,7,8 4764:7
arguments 4689:7 4707:16 4753:7	<hr/> B <hr/>	bit 4691:7,12 4703:13 4704:19,20 4705:8 4712:14 4749:3,12 4751:18 4759:13	budgets 4709:25 4744:10
articulated 4708:2	B&b 4763:10	board 4711:19	build 4696:22
asks 4732:15	back 4692:9 4697:19 4702:4 4715:18,24 4719:23 4725:23 4728:19 4732:23 4733:14 4745:12 4761:8	Bob 4755:5	building 4699:16
aspects 4703:11	back-and-forth 4743:2	body 4693:9	built 4702:12
asserted 4726:16	balance 4713:1 4730:12	boggles 4713:8 4751:25	bulk 4749:24,25
assertions 4739:24	ball 4701:23 4738:6	bolster 4719:7	burd 4749:18
asserts 4739:19	bancs 4692:3	booking 4733:19	burden 4707:24 4708:1,23 4737:1 4741:16 4742:23 4747:5,10,17 4748:2,3, 6 4749:18 4752:8
asses 4731:17	bar 4750:7,8	boost 4709:6	burdening 4709:3
assess 4694:7 4723:10 4747:8	barriers 4692:10	bootstrap 4719:1	burger 4760:21
assessment 4729:10 4743:24,25 4744:12	base 4709:19 4720:18	bother 4754:6	buried 4715:18
assets 4698:11	based 4711:21 4714:5 4718:17 4745:7 4746:18 4755:11 4761:2 4765:8	brakes 4700:13	burning 4690:13
assurance 4713:5	basis 4695:10 4700:1 4708:9 4710:17 4718:18 4737:8 4753:23	breadth 4691:3	business 4699:24
assure 4729:18	battery 4697:11	break 4742:22 4745:3 4746:10 4764:22	businesses 4721:15
attach 4715:12	begin 4689:15	breakdown 4745:15 4749:14 4762:20	<hr/> C <hr/>
attain 4751:9	beginning 4697:18 4703:15 4736:2 4750:6	breakdowns 4764:6	Cal 4689:22 4692:4 4703:2 4708:25 4712:15 4733:14
attempt 4717:13	behalf 4711:13	breaking 4746:10	calculated 4736:10
attending 4765:25	belabor 4737:13,14 4747:18	breakout 4741:22 4743:1 4761:10	calculating 4736:21
au 4732:24	benefit 4745:21	breaks 4764:24	calculation 4736:13,24 4741:25
audit 4721:19 4725:20, 24 4727:1 4728:13 4732:6,9,11,12,13 4737:11,12,15,17 4740:8 4748:11	benefits 4697:8	briefing 4732:8	California 4689:1,9 4690:13 4691:1 4693:25 4698:6 4703:20 4724:4
audit's 4725:22	bewildering 4700:5	briefly 4717:12 4743:21 4753:4	call 4737:11,15 4754:11 4763:10
authority 4726:7	big 4704:2	briefs 4726:11	called 4689:19 4690:20 4750:24
authorization 4740:19	bill 4738:23 4763:9	broad 4704:17	calling 4713:14
authorize 4722:17 4723:25	billion 4690:16 4697:8 4721:13 4740:20	broken 4741:13 4742:16 4744:17 4747:12,14	calls 4711:19
authorized 4692:21 4706:5 4709:21 4717:19 4724:13 4726:9 4727:16 4728:12 4735:1,2 4741:10 4745:6 4746:5		brought 4721:11	Campbell 4703:4,9 4733:15 4756:22,25
avoided 4722:23,25		brush 4704:17	capital 4695:23
		bucket 4701:8 4762:24 4763:21	
		budget 4705:2 4706:21,23 4734:10	

4698:17 4723:17 4725:25 4726:4 4742:10 4747:12,15 4750:17 4758:24	challenges 4691:11,12 4699:22	close 4701:25 4713:24 4714:24 4740:11	4752:4 4753:9 4755:24 4756:21,22 4757:23,25 4758:9 4759:7,9 4762:15,16 4764:20 4765:16,18,19,20
captured 4697:23 4702:6	challenging 4698:25 4737:8	closed 4717:15	commissioners
captures 4691:6	chance 4692:22	closely 4710:10	4689:11,16 4703:6 4705:17 4711:12 4721:7 4740:25 4753:16 4757:2
care 4700:16	changer 4699:9	closer 4758:17	communicate 4692:13 4763:7
careful 4737:18	characterized 4701:6	code 4705:24,25 4735:2 4744:11 4745:25 4746:1,8 4764:7	communicating 4697:13 4701:14
carefully 4706:19 4730:6 4763:18	charged 4709:12 4717:6	codes 4746:8,19	communications 4751:22 4763:3
Caroline 4690:22	cheaper 4723:15	colleague 4712:15	communities 4689:23 4701:11
carries 4694:16	check 4698:9 4755:22 4764:18	colleagues 4734:3	community 4695:18 4700:3,6 4701:10 4730:1 4762:18 4764:21,23,25
case 4689:8 4695:11 4704:8 4706:23 4707:4, 8 4708:2,7 4715:10 4730:21 4731:7 4732:3, 8,9 4733:5 4734:4,11 4737:23 4739:3 4744:13 4746:6 4747:7 4748:12 4750:6,16,25 4756:7,17 4757:14 4760:1,5	choice 4699:2 4728:8	collected 4739:18 4755:13	Company 4689:9,10 4724:3
cases 4704:5 4709:1, 23 4744:20 4763:17 4765:10	choosing 4704:19	combination 4723:8	comparable 4698:9
categories 4695:10 4717:21 4722:4 4726:1, 6 4727:3 4749:5 4758:14	chose 4717:9	combined 4697:7	compare 4694:4,9 4701:17 4718:17 4736:16,18
categorization 4727:2	chosen 4757:13	comment 4756:23	compared 4698:7,20
caused 4693:11	circuit 4729:25	comments 4703:14 4706:18 4730:18 4732:2 4733:17 4737:13 4739:19,25 4741:18 4742:8,9 4749:7,12 4753:15 4755:14	compares 4717:18 4718:9
cautious 4761:1	circumstances 4719:3	Commission 4691:24 4692:16 4694:22 4695:8 4704:10 4706:1, 8,10 4710:10 4713:2,9 4721:22,24 4722:9,13, 16 4723:25 4725:5,11 4726:16 4730:16 4731:2 4732:14,15 4734:25 4736:12,13 4737:10 4738:8,22 4739:5,7 4740:1,6,13, 20 4744:16 4745:1 4746:11 4747:22 4748:12 4750:1,10,18 4751:23 4755:8 4756:14 4760:16	comparing 4695:20 4736:22
CBOS 4701:15 4763:4	citation 4741:24	Commission's 4726:19 4727:24 4735:17	comparison 4718:2,13 4736:20 4746:16
CBRS 4731:11	cite 4705:23	commissioner 4690:23 4691:14 4692:15 4741:1,2 4745:9 4747:10,16 4748:15,17 4749:11	comparisons 4694:9
center 4706:17	cited 4719:19,20 4738:3 4748:9,13 4750:21		compelled 4699:1
centers 4701:10	cites 4726:11 4730:16		compelling 4692:16
cents 4757:1	citing 4731:5 4756:6		competent 4757:6
CEO 4692:16	claim 4708:15 4735:11		complete 4749:6
certificate 4694:18,20, 21	claiming 4755:15		completely 4698:25 4699:8 4719:18 4721:24 4755:9
certification 4751:11	claims 4711:22 4726:14 4754:17 4758:11,13 4760:23		completion 4699:15
cetera 4730:4	clarified 4738:6		complex 4760:6
challenge 4733:3	clarity 4747:3		
	clear 4705:16 4712:23 4718:12 4729:10 4734:8,14 4744:21 4746:15 4752:11,23 4755:16 4756:13 4759:19,22 4760:9 4761:19,20,23 4762:24 4763:2,5		
	climate 4708:5		

compliance 4751:8,10	consequences 4694:17	4724:7 4725:1,8,15	4759:4,18,24 4762:4,24
compliant 4696:10	consideration 4690:4	4726:1 4727:2,3,19,22,	4764:10
complied 4695:2	4724:2 4734:23	25 4728:4,9 4735:20	countervailing 4731:1
comply 4694:16,20	4738:20	4736:7,18 4738:19,21	country 4693:6
4722:13	considered 4692:24	4739:1,13 4740:21	couple 4691:25
complying 4692:18	4710:7 4730:6	4741:21,24 4742:14	4703:12 4707:10
4694:24	consistent 4719:5	4743:5,15 4744:24	4714:18 4735:10
compounds 4723:10	4744:14 4745:5 4748:7	4745:25 4746:13	4738:7
comprehensive	4750:10	4747:8 4758:6,14	Court 4724:4
4732:20	consolidated 4689:8	4761:10 4762:20	cover 4705:11 4706:3
comprehensiveness	constant 4730:21	4764:22	covered 4714:19
4691:3	constitute 4738:25	cost-alternative	4715:22 4716:1,24
comprises 4728:6	4739:25	4731:11	4720:19 4723:18
concern 4749:18	constitutes 4707:23	cost-effective 4693:3	4727:16,21,25 4728:2
4752:2,11	4722:20	4698:5 4716:19 4723:7	4736:19
concerned 4710:2	construct 4752:1	4728:7	COVID 4697:15
4711:2 4734:23 4742:3	contemplated	cost-effectiveness	CPUC 4692:4 4700:20
concerns 4701:13	4737:23,25	4694:8 4711:15 4714:1	CPUC/OEIS 4725:19
4725:24 4740:8,13	contemplating	4722:18 4723:11	CRCS 4763:2
4741:12 4749:4	4748:16	4730:24 4731:10,19	create 4699:6
concession 4753:14	contemporaneous	4732:4 4735:20	created 4697:6 4698:3
conclude 4727:5	4708:18	4736:15,25	4704:23 4720:5
concluded 4728:13	contested 4717:23	cost-recovery 4720:6	creates 4694:13,15
concludes 4726:3	4718:3	costly 4723:1	4709:3
4728:17 4765:24	continues 4706:7	costs 4690:10,14	creating 4695:23
conclusion 4728:3	contrast 4722:24	4692:6,7 4694:1,3,5	4760:9
conditions 4691:21	contribute 4721:14	4697:9,12 4698:16,17,	crisis 4703:20 4752:17
4696:14 4698:12	conversation 4759:14	21 4699:19,22 4701:4	criticality 4694:19
4751:24	Corp 4723:24	4702:4 4704:5,7,10,24	criticize 4707:10
conduct 4756:6	corporation's 4706:6	4705:10,11,18 4706:3,	cross 4755:18
conductor 4714:19	Corporations 4691:1	8,10,19 4707:4,20	Crowe 4725:20 4732:6,
4715:22 4716:24	correct 4714:4 4725:12	4709:2,21 4710:3,22,23	9,11
4720:19 4723:18	4758:20	4712:12,20,21,24	current 4690:5 4720:3,
4727:17,21,25 4728:2	correctly 4738:3	4713:4,6 4715:20,25	4
4736:20	4739:9,10,16,21	4716:18 4718:3	customer 4706:24
confidence 4725:7	cost 4692:25 4695:7,21	4721:16,18,22 4722:1,	4709:3 4723:15
confident 4712:11	4698:22 4700:4 4701:7,	3,7,10,14,16,17,20	customers 4692:13,24
confirm 4764:18	20 4702:8,15 4707:17	4724:1,2,12,16,17	4697:13 4700:12,16,19
conflict 4694:13	4711:15 4712:21	4725:4,6 4726:17,21,23	4701:1,9,13,24 4709:12
conflicting 4725:10	4713:12,25 4714:10,16	4727:4,6,18,20 4728:2,	4721:12 4751:24
consecutive 4693:10	4715:5,13,14,17 4716:5	5,8 4729:7 4732:15	4763:6,8
consequence 4711:4	4717:6,8,11 4719:14,	4733:5 4735:1,3	customers' 4705:10,
	15,21,22 4720:2	4738:18,25 4739:6,8,	20
	4721:25 4722:3,25	10,14,17,20,22,23	
		4741:7,9,13,17	
		4742:10,16,19,22	
		4743:6 4744:25	
		4745:12,16 4746:7,10,	
		14 4747:21 4748:4,10,	
		14,21 4749:5,6 4750:17	
		4751:5,17 4753:1	
		4754:3,6,7,9 4755:9,10,	
		12,15 4758:8,12	

cut 4702:23	deep 4714:1	determination 4715:5	4695:6,17 4717:19
cycle 4744:15	defects 4698:3	determine 4710:13	4718:22 4734:16
	deficiencies 4713:21	4727:3 4758:5	4751:15
D	4740:16,18	determined 4726:17	disallowed 4693:16,17
D.11-05-018 4726:13, 16	deficient 4718:21,22, 23 4740:2 4765:14	determines 4739:6	4695:13
D.19-05-036 4738:23	define 4707:7	determining 4739:12	disc 4756:1,11
dais 4706:17	degree 4704:9	developed 4762:19	disconnect 4765:4
data 4695:18 4697:22 4698:24 4699:4,6,9,18, 20,22 4732:25 4739:18 4755:13 4759:13,17 4760:2,6,10 4761:15,16 4762:2	demanding 4699:7	developing 4693:1 4698:18	discontinued 4751:7 4756:1
database 4695:24	demonstrate 4712:24 4714:7 4716:23 4717:2, 8 4722:6 4734:13 4736:1 4742:18 4750:12	development 4720:9	discovered 4743:2
date 4748:1	demonstrated 4748:20	devote 4738:1	discovery 4743:2,14 4745:24
dates 4708:5	demonstrates 4729:14,15 4737:3	DIAR 4743:22 4744:7 4750:13	discrepancies 4721:18 4724:16,20,21, 23,25 4725:16 4728:10 4758:18,19
day 4697:21	demonstration 4716:5 4736:25 4749:6,25	Diego 4689:9,21,25 4712:7,19 4714:6 4716:6,12,17 4717:7,9, 20 4718:9,12,15,20 4720:5 4735:23 4736:23 4753:19,25 4754:5,25 4760:18	discuss 4695:10
days 4710:6 4729:21	denied 4740:15 4755:10	Diego's 4711:15,19 4713:10 4714:3,18 4715:10,11 4716:15 4717:12 4718:24 4719:12 4720:3,7 4721:15 4735:11 4736:10	discussed 4690:23
de 4709:20 4710:4 4711:5	denies 4739:9,21	difference 4745:10	discusses 4744:4
deal 4760:6	deny 4722:1,14 4726:24 4728:1,4,5 4739:7	differences 4703:17	discussion 4711:7 4712:16 4716:20 4732:7 4753:4 4763:15
dealing 4713:9 4718:25 4737:5	departed 4735:21	difficult 4698:8 4727:3	discussions 4763:13
dealt 4742:5	Deputy 4703:9	dire 4729:9	dispute 4736:24
December 4689:2 4690:6	describing 4692:12 4735:17	direct 4700:24 4715:20	disregarded 4710:3
decides 4719:6	description 4743:22 4744:2 4745:18 4746:13,16	directives 4700:7	distinction 4715:25 4719:12,20
decision 4690:5 4696:1 4700:15 4703:12 4710:17 4711:20 4714:13,15 4715:8,10 4718:8 4719:13 4736:3 4737:24,25 4738:4,5 4741:19 4742:17 4750:23 4754:21,24 4756:6,17 4758:3 4765:6,8	deserve 4704:16	directly 4706:24	distribution 4716:21 4722:24 4723:18 4725:25 4726:4 4758:23
decisions 4712:9 4714:7 4730:7 4735:17	design 4710:22	director 4690:22,24 4703:9	distributor 4704:21
deem 4702:4	destructive 4691:19	disadvantages 4732:1	district 4723:16
deems 4706:10	detail 4733:1 4743:19 4745:24 4749:22 4761:3 4762:18	disallow 4706:9 4721:22 4725:15	districts 4709:22 4710:4,24
	detailed 4698:13 4728:24 4729:22 4762:20	disallowance 4700:4 4702:1 4711:17 4712:1, 11 4714:25 4718:5,6, 15,16 4735:6	diversion 4727:10
	details 4743:15 4762:8 4763:20	disallowances	diverted 4726:20,23,24 4727:13 4740:5 4759:1

4765:12	easy 4729:24 4759:25 4760:4	employees 4708:4,8, 12,16	estimated 4690:16 4727:22 4745:18
documentation 4707:19 4708:9,11 4725:8 4739:23 4755:17	Edison 4718:11,17,21 4719:2 4754:19 4756:6, 17	en 4692:3	estimates 4727:24
documents 4761:9	effect 4731:12	enable 4702:13 4721:24 4755:8	evaluate 4716:17 4721:24 4723:6 4728:6 4740:6 4755:9
dollar 4718:14,16 4741:14 4764:20	effective 4723:2,12 4761:17 4763:13	enabled 4736:20	event 4700:17
dollars 4690:19 4700:21,22 4701:8 4745:14,19 4763:16	effectively 4739:13	end 4720:19 4721:24 4733:2 4764:5	events 4717:1
double 4727:14	effectiveness 4731:17,25	energy 4703:10 4716:13 4731:17 4748:25	evidence 4726:11 4727:5,6 4731:8 4739:23,25 4755:17 4756:7 4758:5,7 4759:17 4761:16,18,19 4762:2
double-recovery 4732:18 4734:23 4735:4	efficiency 4692:25 4736:11	enforces 4713:2	evidentiary 4717:14 4740:11
Douglas 4762:15,16 4765:16,18	efficient 4700:25 4717:3	engagement 4695:18 4700:3,6 4764:21,23,25	evolved 4730:10
downplays 4710:4	efficiently 4716:25 4738:19	engaging 4692:20	evolving 4692:19
dramatically 4692:7	effort 4730:21	engines 4698:2	exact 4692:1 4748:11 4749:22 4750:15
drive 4763:7	efforts 4716:25	enhancements 4764:9 4765:1	examination 4729:2 4743:4
driven 4700:6	egregious 4695:17	ENS 4764:8 4765:1	examine 4694:12 4740:14
driver 4699:18	electric 4689:10,21,25 4691:1 4696:12 4716:18 4725:25 4726:4 4758:23	ensure 4727:9,13 4740:21 4758:18,19,21	examined 4692:7
drone 4697:18 4698:10,22 4711:22 4714:19 4715:23 4719:14,16,25 4723:19 4729:9 4737:7 4739:10, 14,17,21,23 4741:20 4742:14 4743:6,23,25 4749:14 4750:13,22,25 4754:6,12 4755:12 4756:1 4759:24	electrical 4706:5	entire 4698:14 4764:21	examine 4694:12 4740:14
drones 4694:11 4695:18,19 4696:13 4697:10,15 4719:4 4729:5 4731:23,25 4739:18 4751:21 4755:13 4759:15	elements 4707:15	entirety 4732:25 4750:19 4752:1	examined 4692:7
dropped 4738:5	eliminates 4725:7	entities 4716:9 4717:5	executive 4692:2
DRS 4743:2	eloquent 4706:17	entitled 4713:5 4738:21	exercise 4706:21
dry 4691:21	embedded 4707:20	equipment 4696:24 4722:25	exhibit 4731:23 4732:20 4740:4,15 4758:25 4764:3,13,14, 15
	embrace 4748:2	Ernst 4729:13 4733:4 4737:11	exhibits 4726:22 4740:3,10 4764:5
	embraced 4733:2	error 4763:19	exist 4695:14 4724:25
	embraces 4748:3	escalating 4691:5	existed 4735:16 4736:8
	embracing 4748:6	essential 4738:20	existing 4707:20
	emergency 4701:12 4751:24	establish 4707:21 4722:2,18 4726:7 4739:13,23 4740:12 4753:22 4755:18 4759:2	exists 4750:7
	emerging 4691:4	established 4710:1 4723:14 4760:8	expect 4745:14
	emphasize 4734:2 4755:6	establishing 4705:15	expediency 4730:25
	emphasized 4730:18	establishment 4729:3	expense 4743:12
	emphasizes 4705:9		expenses 4747:13
	emphasizing 4719:12		expensive 4728:7 4739:11 4752:19
<hr/>			
E			
<hr/>			
earlier 4698:16 4729:5			

experience 4692:2 4719:6	failing 4722:6	finding 4696:13 4701:23 4752:9	forecasts 4746:24
experienced 4691:16, 18 4692:6 4694:2 4701:7,20 4762:4	fails 4694:14 4696:2 4708:22 4714:21 4717:20 4721:23 4723:21 4725:21 4726:7 4727:9 4740:15 4755:7	findings 4697:5 4725:22 4744:5,7	forward 4694:3 4696:4 4702:14 4711:7 4730:8 4734:22 4743:18 4745:2 4750:11 4753:25 4754:22,23
experts 4764:1	failure 4694:16 4707:23 4713:7 4721:16 4731:5 4739:22	fine 4694:23 4699:3	foster 4750:25
explain 4723:4 4725:16 4758:22	failures 4723:10	finer 4694:22 4700:21, 22,23	found 4697:2,4 4700:17 4719:24 4721:19 4722:21 4727:1,21 4733:5 4739:11,16 4740:1,19 4750:1 4755:11 4765:14
explained 4726:22 4740:8 4758:20 4760:6 4763:18	fair 4749:12	finger 4754:4	foundation 4689:23 4702:12,15 4721:5
explaining 4763:16	fairly 4702:6	finish 4753:7	Fourth 4725:19
explains 4726:23 4758:24	faith 4708:21	Finkelstein 4711:10, 11,13 4731:5,9 4735:9 4753:13 4756:4 4760:13 4762:6	fraction 4711:1
explanation 4718:19 4720:4 4737:7	falls 4763:14	fire 4692:4 4696:20 4702:16 4709:22 4710:3,20	framework 4710:14 4712:16
explicit 4738:23	families 4721:15	fires 4690:14 4692:17 4702:10 4703:20,23	framing 4705:14 4707:12
exploration 4691:10	fashion 4750:16 4760:3	firm 4748:10	FRANCISCO 4689:1
exponential 4744:6	fast 4696:22 4698:16	five-million-plus 4764:12	frankly 4695:25 4702:12 4705:14
expresses 4705:8	faster 4692:9,10,13 4699:14	five-page 4717:18	fresh 4703:21
extensive 4732:7	fatalities 4690:19	fix 4698:4	fringes 4720:13
extensively 4744:3	favor 4711:20	fixed 4697:1,25	front 4691:24 4692:3 4706:16 4749:16
extent 4720:25 4742:25	fear 4763:14	fixes 4729:7	frustrating 4701:6
extra 4697:12 4709:14	feature 4750:23	flat 4741:14	fuel 4722:3
extraordinary 4713:4	feedback 4717:4	flaws 4698:19	full 4712:10
extrapolated 4733:8	feel 4733:24 4734:1	flown 4698:10	fully 4714:11,12
extreme 4693:5 4695:1 4696:3,7,14 4729:25 4762:3	feeling 4705:9	flying 4697:10,15 4699:17	Fulton 4728:24 4730:13,14 4742:25 4743:21,25 4745:20 4747:14,19 4749:10 4755:19,22 4756:20 4764:17
extremely 4702:6,9	field 4701:23	focus 4754:23	fundamental 4725:3
<hr/>			
F	figure 4719:21	focused 4716:25	fundamentally 4708:22
	figures 4749:22	focusing 4733:17	funded 4708:14 4709:10
face 4691:11 4692:8	file 4698:1 4740:3 4743:17	follow 4758:14	
faced 4691:13	filed 4740:10	football 4756:9	
facing 4729:4	filings 4761:17,18	force 4692:14 4733:21	
fact 4699:3 4700:22 4704:11 4730:23 4731:13 4750:13 4751:8 4756:9 4765:13	finally 4700:3 4719:4 4727:15	forecast 4744:18 4745:11,19 4747:1 4750:15	
factors 4731:1	financial 4732:12	forecasted 4695:10 4744:13	
failed 4722:2,8,13,16, 18 4736:2 4740:4,12	find 4693:7 4696:13,16 4698:3,4 4734:25 4735:3		

funding 4695:9 4709:11	governor's 4692:14	harden 4693:2	hiring 4708:5	
funds 4726:8,12,23,25 4740:5 4758:25	grants 4725:1	hardening 4710:22 4723:19	historical 4695:13	
future 4695:9,25 4697:24 4737:15 4744:20 4745:4,11	gravity 4691:15	harping 4708:25	history 4704:19	
future-looking 4745:19	GRC 4690:5 4694:2 4695:11 4700:2 4705:2, 3 4706:22,23 4708:14, 18 4717:20,21,22 4718:6 4726:10 4727:2, 11 4728:12 4737:25 4738:12 4744:18 4750:23 4758:15 4759:4 4761:21	hastily 4739:11	hold 4722:5,11 4732:16 4735:11,15 4740:17 4756:12	
<hr/>				
G				
<hr/>				
game 4699:9 4756:9	GRC-AUTHORIZED 4732:24	heard 4714:20 4720:10 4753:16	holding 4735:13 4754:17	
gas 4689:9,21,25 4716:17 4742:5,6	GRCS 4710:1	hearing 4692:3 4701:25 4753:10 4763:8	holds 4725:23	
gather 4699:6	great 4701:24 4736:6 4745:21	hearings 4732:8 4740:11 4764:6	homes 4697:15	
gave 4719:2 4735:13	greater 4711:17	heart 4690:11	honestly 4747:24	
general 4689:8 4704:5, 8 4715:10 4734:11 4737:23 4739:3	grid 4710:21	helping 4734:1	Honor 4733:11 4735:10 4753:14 4764:17	
generally 4701:22 4712:17	ground-based 4696:10 4697:5 4732:1 4744:8	Hereto 4725:14	hook 4754:20	
genesis 4763:13	group 4727:21	Hey 4734:5	hope 4701:25	
geospatial 4699:25	grows 4691:21	HFTD 4698:14	hoping 4753:13	
Geraghty 4690:2 4702:19,22,25 4728:22 4742:24 4743:24 4744:19 4759:16,19 4761:15 4762:23 4763:25	guardrails 4709:17	hidden 4744:21	hospital 4730:4	
give 4702:20 4711:23 4734:6 4757:16 4764:4	guess 4742:15,20 4745:9 4750:19	high 4704:9 4709:22,24 4710:3,20 4750:7	Houck 4690:23 4703:6, 7 4741:1,2 4745:9 4746:11 4747:10,16 4748:17 4752:4 4755:24 4756:22 4757:23,25 4758:9 4759:7,9 4764:20	
goal 4751:9,19	guidance 4701:1	high-fire 4697:11	hours 4759:23	
goalpost 4756:8	guidelines 4699:20	high-fire-threat 4723:16	huge 4697:2	
Golden 4724:3,10	<hr/>			
good 4689:11 4703:5 4708:21 4721:7 4747:2 4750:24 4758:10 4765:14	H			
governance 4695:18 4698:24 4699:5,9,18,22 4759:13 4760:2,6,10 4761:15,16 4762:2	handout 4717:12 4718:9 4724:22 4725:23	high-risk 4702:9	humbly 4690:4	
government 4725:17	hanging 4757:5	higher 4718:15 4721:15 4730:19,21 4735:12,14 4749:21 4750:9	hundreds 4715:16	
governor 4693:7	happen 4758:16	highest 4711:3 4713:12 4721:13	hypothetical 4709:7	
	happened 4714:18 4717:25 4718:11	highlighted 4709:23 4734:15 4750:22 4762:10	<hr/>	
	happening 4702:11	highlighting 4734:3	I	
	happy 4733:12 4749:9	highlights 4707:3	<hr/>	
	hard 4711:14 4713:17 4757:1	highly 4720:21 4737:9	identified 4719:16 4724:19 4725:20 4740:13 4758:18	
		hindsight 4693:21 4702:7 4745:21	identifies 4759:24	
		hired 4729:11	identify 4708:4,16 4758:20	
		hires 4708:6	ignition 4722:23,25 4723:1	
			ignitions 4722:22 4723:3	
			illuminating 4718:13	

illustrates 4756:4	4733:6,7,8,18 4734:11	4722:24 4723:8,19	<hr/> J <hr/>
imagine 4694:25	4738:2,12 4747:21	4732:1 4742:12 4744:8,	
4697:14 4698:5	4748:13 4758:8,12	17 4750:13,16 4751:1	
implement 4692:21	incrementality	installation 4723:9	Jacobs 4690:22,24
4739:5 4751:10	4707:14 4709:16	instance 4737:19	job 4706:13,14 4762:7
implementation	4710:14 4729:13,14,15	instances 4750:1	John 4691:15 4765:19
4739:4	4732:17,22 4737:20	instantly 4709:6	Joint 4727:20
implemented 4720:15	4738:8 4748:9 4749:25	instructs 4722:4	Judge 4689:4 4711:12
4739:11	4752:21 4754:20,22	intended 4726:9	4741:2 4752:4 4753:4
important 4694:17	4758:1,2,6 4759:2	4754:3	jump 4750:20
4698:15 4707:12	incumbent 4710:9	intense 4760:9	justified 4710:13
4708:24 4716:8 4733:6	4760:16	intention 4763:6	<hr/> K <hr/>
4738:10 4752:16,22	incur 4714:10	interest 4692:24	
impossible 4729:18	incurred 4690:10	4711:25	
4765:7	4694:4 4702:4,9	interested 4697:16	key 4702:2 4731:1
improper 4702:5	4719:15 4745:17	4753:9	kick 4713:15
improve 4761:23	4748:21	intervenors 4760:5,11	kind 4701:5 4716:4
improvements 4691:2	indicating 4748:17	4761:4	4736:20 4737:16
4714:11	individually 4697:6	introductory 4738:4	4741:5
in-person 4765:25	4747:9	invest 4691:1 4701:2	knew 4693:22 4712:7
inadequate 4711:15	industry 4693:6	investing 4695:23	4714:6 4737:4 4745:7
4734:15 4754:20	information 4713:12	investment 4692:21	4756:15
inadequately 4757:14	4715:13,15,17,19	4696:18	knowing 4696:14,15
inappropriate 4705:20	4716:4,15 4725:10	involves 4724:8	4753:20,21
incentivize 4690:25	4728:14 4741:24	IOU's 4727:21	kudos 4704:16
incident 4697:7	4742:2 4743:5 4755:12	irrelevant 4737:9	<hr/> L <hr/>
include 4698:17	4758:2 4762:11,13	issue 4720:14 4721:2,	
4724:2 4743:1,6	informative 4754:15	21 4742:6 4748:5	
4754:21	infrastructure	4751:14 4758:10	labor 4707:22 4708:15
included 4710:12,21,	4696:21	issued 4694:23	4729:11
22 4724:5 4739:9	initial 4733:17	issues 4693:24 4697:2	labors 4707:17
4741:22 4744:22	initiative 4715:19	4700:20 4717:23	lack 4712:5 4713:25
includes 4693:1	4718:2 4732:21,23	4733:1 4751:2 4753:17	4721:18
4744:11 4748:8	4736:14,15 4754:15	4760:21	lacking 4758:3
including 4744:5	initiatives 4714:18,21	item 4699:15 4733:1	language 4707:9
4746:14	4715:15 4720:10,16	4741:14 4743:11,12	4710:2
increase 4706:24	4736:11 4738:7 4746:9,	4745:24 4747:8	large 4711:1 4714:21
increased 4692:19	20	4754:12 4765:1,2	4725:5 4748:4
4741:21	insistence 4713:10	items 4692:11 4764:4,	largely 4719:12
increasing 4723:21	inspection 4695:20,21	9,23,24	4760:20
increasingly 4709:3	4696:15 4719:14		larger 4697:7,25
incremental 4699:19,	4729:9 4739:10,15,17,		4749:24
23 4705:3,4 4706:4	22 4741:21,23 4743:23		largest 4691:16,18
4708:16 4727:4,6	4749:15 4755:12		
	inspections 4695:22		
	4696:10 4714:20		
	4715:23 4716:1 4720:1		

Larsen 4689:4 4702:17,20,23 4703:1,8 4711:8,12 4721:5,7 4728:16 4732:21 4733:13 4735:7 4738:14 4740:23 4741:2 4752:4 4753:6, 11 4755:21 4756:18,21, 24 4757:21 4759:7,10 4762:15 4763:22 4764:13,15 4765:3,19, 21,23	life 4707:1 limited 4720:15,20 lines 4759:13 list 4697:2 listed 4724:21 listen 4691:8 listening 4701:1 4748:15 literally 4690:13 lithium 4697:11 litigation 4749:2 lives 4690:17 4761:7 location 4730:3 logic 4719:17 4720:4 lone 4693:4 long 4715:16 4735:13, 16,21 4736:8,9 4743:13 4756:13 longer 4709:13 4738:9 longstanding 4715:3 4756:14 looked 4732:10 4756:15 loophole 4709:4 lost 4690:17 lot 4697:16 4703:22 4704:14 4713:17 4757:3,4,6	major 4703:22 4721:17 4722:15 4723:17 majority 4695:9 4715:11 make 4696:17,19,24 4707:4,5,8,24 4709:2 4714:16 4716:6 4717:13 4736:2 4745:1 4746:19,23 4752:9,11 4755:19 4756:23 4761:12,17 4763:20 makers 4700:8 makes 4760:4,8 4761:22 making 4692:1 4695:22 4697:17 4699:11 4700:25 4701:14 4707:17 4712:8 4714:7,13 4727:3 4733:23 4734:4 4736:3 management 4722:3 4759:17 manager 4714:4,5 4735:16 4736:8 4754:1 mandate 4724:11 mandatory 4730:23 manner 4716:19 mapping 4732:23 massive 4691:21 material 4719:8,9,11 materials 4709:5 4716:4,11 4717:15 4719:24 math 4695:19 4718:13 4752:17 matter 4690:11 4707:25 4726:5 4731:13 4739:2 4760:21 matters 4713:9 4717:23 meaningful 4709:17 means 4704:21 Mediterranean 4691:23	meet 4691:4 4707:24 4731:6 4752:8 meeting 4691:14 4696:11 4699:4 4729:22 meetings 4706:18 4717:17 memo 4705:9,11,15 4706:2 4709:5 4724:1, 5,6,14 4729:3 4733:19 4749:2 memorandum 4704:24 4706:9 4711:25 4712:19,25 4724:9 4741:11 4748:22 4753:21 mention 4717:20 mentioned 4704:11 4705:15 merit 4723:21 met 4748:7 meter 4763:9 metrics 4699:25 Mike 4703:9 mile 4727:19,23,25 million 4694:23 4697:6 4699:3 4700:23 4710:6 4715:20,21,23 4722:19, 23 4723:5 4724:12 4725:19 4726:3,5,25 4727:18,19 4728:12 4742:10,11,13 4757:9 4764:10 millions 4700:20,21 mind 4704:2 4713:8 4751:25 minimalization 4735:20 minimis 4709:20 4710:4 4711:5 minor 4762:25 minute 4694:11 4699:3 minutes 4691:9 4702:17,21 4703:13 4728:20,21
last-minute 4739:24 last-resort 4700:15 lastly 4698:7 4701:17 Laura 4728:24 4730:11, 14 4743:19 law 4689:4 4713:22 lawfully 4724:13 lawyer 4705:23 leader 4703:23 4704:16 leads 4743:14 learn 4695:2 learned 4703:22 4743:3,11,17 4744:20 4748:24 4753:18 4759:20 leave 4701:25 4755:2 led 4711:2 legislation 4703:21 4704:3 4705:16 4734:20,21 legislature 4734:22 legitimate 4741:7 lens 4702:5 lesson 4743:3,17 4744:20 4753:24 4759:20 lessons 4703:22 4748:24 4753:18 letter 4692:15 letters 4705:25 level 4709:24 4713:13 4732:21 4749:22	<hr/> M <hr/> made 4692:3 4702:1 4703:21 4706:17 4713:3 4714:13 4718:21 4743:1 4761:18 4763:2,19 magnitude 4713:7 4748:4 maintain 4721:23 4745:6 4751:10,11 4755:7 maintenance 4709:9, 12 4726:6		

misapplied 4708:2	nonetheless 4749:3	one's 4698:24	overspent 4726:5 4740:7
missed 4719:13 4761:6,7,11,12 4762:1	norm 4690:14	one-for-one 4709:6	overstate 4711:14
misses 4733:18	noted 4691:15	One-hundred 4759:25	overwhelming 4729:6
missing 4719:18	notification 4701:12	one-year 4720:22	
miti 4731:18	notion 4713:19 4735:18 4736:5 4737:6	online 4700:10	<hr/> P <hr/>
mitigation 4690:22 4699:11 4702:2 4704:25 4706:4 4708:13,17 4712:18 4713:11 4715:2,4,8,12, 14 4716:3,10,24 4720:9 4724:9 4726:14 4735:24 4737:3 4738:24 4750:3 4754:2, 14	November 4689:13	onset 4729:4	P.M. 4689:2
mitigations 4716:19	nuanced 4758:6	opening 4689:15 4690:1 4728:17,20 4739:19,25 4755:14	pages 4715:16 4724:21 4731:8 4743:5 4759:23 4760:19,20 4761:9 4762:1,13
model 4720:8 4729:19	number 4696:24 4703:20 4713:8 4725:12 4736:11 4744:5,7 4747:20 4758:21 4764:13,16	operations 4692:23	paid 4693:7 4727:10
models 4693:1 4698:3, 18	numbers 4706:1	operator 4696:23	painfully 4763:18
modifying 4714:23	numerous 4724:16,24 4740:16 4761:18	opportunity 4704:6,23 4706:22 4712:20,22 4734:21 4747:7	painting 4704:17
moment 4753:18	<hr/> O <hr/>	opposed 4731:12 4745:17	part 4695:3 4704:1,2 4729:2 4731:19 4734:11 4736:3,7 4738:3 4754:24
money 4711:23 4719:2 4734:6 4752:8,12,18,20 4753:1,2 4757:4 4758:23	O&m 4698:17 4742:11 4747:12,14 4750:17	oral 4689:6,14 4717:13 4753:7 4765:25	parte 4717:17
months 4698:14 4740:11	oath 4725:12	oranges 4694:8 4746:15	participating 4689:12
move 4692:10 4728:18	obligated 4739:7 4758:13	order 4693:16 4699:7 4716:17 4717:8 4728:19 4738:2 4754:8	parties 4689:12,17 4707:6 4741:4,12 4742:18 4747:7 4749:4 4753:3
moved 4701:23	obligation 4707:2,3 4757:11	organized 4765:9	partners 4701:16
moving 4756:8,11	obligations 4694:16 4696:11	originates 4726:13	party 4689:19
multiple 4731:11	observation 4719:5	outcome 4693:18 4709:18	passed 4734:20
<hr/> N <hr/>	obvious 4696:9	outlines 4689:13	past 4741:5 4750:9 4765:5
NARUC 4690:20	occasion 4761:8	outreach 4701:11 4762:18,21	pat 4717:10
nation 4721:13	occurred 4749:20	outright 4693:17	patrol 4722:24
nature 4706:20	OEIS 4690:22 4692:4 4699:19 4721:19 4724:18 4725:4,10 4740:13,18 4760:9 4761:17	outset 4704:11	pattern 4718:20
needed 4707:18 4713:11,12 4716:5,16 4717:7 4752:7,8,24	offered 4724:22	over-recover 4725:25	pay 4707:5 4709:14 4713:3 4721:12 4733:21
needlessly 4721:14	Office 4703:10	over-recovery 4721:20	paying 4705:5 4713:5
nomenclature 4737:19	offices 4717:17	overhead 4698:11 4716:20 4723:18	PCF 4721:5 4723:14 4724:19 4738:15 4757:25 4758:10,18
	OIR 4700:7	overlap 4712:14	PCF's 4740:14
	OIS 4699:19	oversight 4699:8	PD 4693:19 4694:8,13, 14 4695:7,12 4699:21 4707:2,9,10,14,16
		overspending 4726:1	
		overspends 4758:11	

4708:2 4710:2,11 4711:18 4714:23 4721:14 4722:1,4,7,10, 12,13,19 4723:10,20 4724:11,15,24 4725:2, 9,14,21,23 4726:3,11, 24 4727:4,9,12,15,17 4728:1,3,11 4729:12 4739:9,10,16,19,21 4740:15,17,18 4741:13 4742:8,9 4749:7 4751:15 4755:11,14,23 4758:17,21	PG&E's 4698:19 4727:18,19,20,22 4737:2 4748:10,12,13 Phase 4742:4 phone 4763:10 picking 4704:18 pictures 4697:22 pin 4700:15 pipe 4742:6 place 4689:6 4722:12 4752:2 places 4700:11 4707:11 plan 4712:18 4715:4 4720:9 4724:9 4737:3 4739:1 plane 4699:16 planet 4729:20 planned 4720:17 planning 4692:19 plans 4713:11 4715:8, 12,14,16 4716:10 4717:2 4738:24 4754:14 plant 4716:3 playing 4756:10 pleadings 4737:12 podcast 4690:20 4691:8 4702:6 podium 4689:20 point 4692:1 4693:20 4720:7 4731:23 4732:10 4733:18 4734:2,19 4736:10 4737:16 4742:10 4743:16 4744:2 4747:4, 11,19,22 4749:17 4750:20 4756:3 4759:25 pointing 4734:3,4 4762:7 points 4733:23 4735:10 4739:18 4755:4,19	police 4730:4 policy 4700:8 poor 4712:1 4757:15 portion 4701:7 4712:12 4720:16 portions 4738:4 position 4719:7 4749:11 4758:4 possesses 4738:22 possibly 4698:5 4754:5 post-2019 4762:3 potential 4736:17 power 4730:1 practice 4704:14 practices 4713:23 4744:23 4745:4,7 4746:19,22 4748:19 precedent 4694:14 4750:2,10 4756:14 precisely 4764:1 prepare 4721:23 4755:7 prepared 4742:21 prescribed 4735:2 present 4757:13 4762:11 presentation 4715:4 presented 4746:7 president 4692:16 4703:5 4721:8,10,11 4759:12 4760:11,13 4762:5,14 4765:21,22 pretty 4711:1 4717:24 4760:17 prevented 4738:19 previous 4729:6 4753:6 previously 4708:14 4741:10 4748:8 prey 4763:14	primarily 4751:23 primary 4699:18 prime 4697:1 prior 4721:19 4727:10 4742:17 prioritizing 4711:2 priority 4730:25 4752:19 probing 4753:17 problem 4724:25 4725:3 4751:2 4757:17, 18 problems 4701:3 4719:16 4765:15 proceeding 4689:8 4690:7 4711:16 4712:2 4721:3 4724:7,14,17 4730:17 4731:8 4732:19 4737:10 4741:20 4750:4 proceedings 4713:10, 18 4718:3 4743:13 4749:20 process 4689:14 4705:2 4737:22 4738:11 4743:14 4748:24 4749:1 4761:24 processing 4739:17 4755:13 produce 4695:14 4699:24 4717:16 produced 4697:8 professional 4696:12 profits 4709:6 program 4695:22,24 4696:3,8 4697:3,8,18 4698:8,22 4711:22 4712:12 4714:22,24 4719:14,17,25 4720:10, 12 4729:9 4731:15,18 4737:7 4741:21 4743:22 4744:7,11,24 4745:18 4746:17 4750:14,22 4751:6,12 4754:12,13 4755:25 4756:1 4759:25
--	--	--	---

4761:16 4764:21	prudent 4696:9,17,23 4714:4,5 4730:23 4735:15 4736:8 4742:19 4745:17 4753:2 4754:1	4765:17,24	reasonableness 4690:8 4707:14 4709:15 4710:15 4711:16 4713:25 4714:8,17 4715:6 4716:5 4717:6,8,11 4718:1 4721:25 4722:2, 7 4726:19 4730:20,22 4732:17 4733:25 4734:7 4736:1,7 4740:6 4741:9 4745:13 4747:20 4748:1,20 4750:8 4752:9 4753:22 4755:9,18 4756:15 4757:10 4759:17 4760:22 4762:12
programs 4693:21 4696:15 4697:5 4698:18 4702:2 4706:4 4720:22 4724:19 4725:18 4726:9 4727:8, 11 4728:12 4729:12 4731:4 4732:5 4739:15 4740:5 4743:6 4744:3 4745:5 4751:15 4752:14	PSPS 4692:13 4693:14 4700:7,14 4701:16 4717:1 4751:21 4764:8, 12 4765:1	quote 4691:17 4721:22, 25 4742:11	
progress 4699:11 4746:3	PU 4705:23,24 4735:2	raise 4705:20 4749:4	
projects 4710:12 4723:17 4746:23	Public 4703:10	raised 4705:10 4741:12	
proof 4707:24 4708:1, 23	PUC 4691:14 4723:24 4724:3	rapid 4729:4	
proper 4709:15 4742:23	pull 4700:15	rapidly 4698:1,4,15	
properly 4699:7 4731:2	Pump 4700:13	rate 4689:8 4691:3 4695:11 4704:5,8 4715:10 4720:8,18 4733:22 4734:11,12 4737:23 4739:3 4744:13 4746:6 4750:24	reasonableness-like 4749:19
proposed 4690:5 4694:23 4703:12 4711:20 4714:15 4718:7 4719:13 4738:4, 5 4741:19 4758:3	punished 4702:16	ratepayer 4710:15	rebuttal 4724:23 4728:18,22 4730:13 4733:15 4735:9 4738:16
prospective 4705:2	purported 4725:4	ratepayers 4705:5 4707:5 4713:3,4 4725:21 4733:21 4752:18	received 4693:16 4697:20 4700:23,24
Protective 4689:22	purpose 4733:7	rates 4705:19 4707:20 4709:11 4710:6 4721:13,15	receiving 4694:19
proud 4700:16	purposes 4718:1	reach 4751:9	recent 4691:14
prove 4721:16 4722:16 4726:20 4731:7 4732:16,17 4748:3	pursuant 4724:10 4725:14	read 4710:1 4757:10	recently 4694:23 4715:9
provide 4699:7 4707:19,21 4708:7,11 4722:8 4723:15 4732:3 4739:20,22 4749:22 4755:17	pursuing 4716:18	ready 4696:25 4765:24	recognition 4704:4 4715:3 4761:25
provided 4705:7 4724:22 4725:3,10,23 4733:3 4741:24 4744:15 4745:24 4758:5 4764:5,6	put 4700:25 4705:19 4707:7 4716:3 4720:18 4734:22 4752:1 4754:4 4757:15 4760:3 4762:22	real 4741:12	recognizable 4696:1
providers 4701:12	putting 4704:14 4754:25	realization 4735:25	recognize 4690:7 4694:15 4698:19 4710:8 4716:8
providing 4705:13 4716:15 4732:3,24 4745:17 4747:5	qualified 4696:12	realize 4712:4	recognized 4690:25 4693:6,9,13 4736:12,13 4747:23
prudency 4741:16	quarterly 4699:25	reallocate 4709:5,8	recognizes 4713:2
	question 4712:7 4737:20 4746:2,3,15,18 4748:18 4751:13 4756:19 4757:24,25 4758:10	realtime 4756:12	recommend 4691:8
	questioned 4743:16	reason 4733:9 4740:19	recommendation 4713:17
	questioning 4741:7	reasonable 4705:4,5 4707:5,18 4709:2 4712:16 4713:1,6 4726:18,21 4727:20 4733:6,22 4734:12 4736:4 4739:6 4740:21 4741:17 4745:3,14 4749:5,7,11 4750:1 4752:13	reconsideration 4690:4
	questions 4689:16 4733:12 4740:24 4742:15 4753:8,17 4757:22 4759:8,11		record 4689:5 4698:13 4708:7,8 4711:17,21 4712:10 4717:14 4719:8,9,18,19,20

4720:5,6 4723:13 4729:8,10,13,15 4731:8,22 4733:4 4734:14 4736:22 4742:2,9,16 4743:3,7,9 4744:3,6,22 4746:23 4749:13 4759:23 4760:7,8,18,23,24 4761:3,14,19,22 4762:1,8,23 4763:2,19, 23 4765:14	4761:10 4765:10 referenced 4699:3 references 4712:5 4731:14 referred 4720:8,11 4746:12 referring 4721:1 reflect 4750:18 4751:16 4755:23 4761:13 reflected 4707:22 4714:12 4741:13 4746:25 4749:15 4750:16 4751:5 reflecting 4744:23 4746:13 reflects 4729:13 regarded 4701:22 regulated 4693:25 4707:1 regulators 4690:21 4699:10 4700:1,8 4701:2 regulatory 4694:12 4713:22,23 4757:7 reject 4711:19 4724:11 4728:8,9 relate 4755:15 related 4704:24 4739:24 4742:11 4762:4 relative 4710:16 4718:14 release 4709:25 relevant 4718:2 reliability 4726:6 relied 4716:6 4763:17 relief 4713:15 relies 4726:13 4727:4 rely 4696:16 4698:13 4717:9 remain 4698:9 4704:15 4750:9	remediation 4741:22, 23 remedied 4718:7 remedy 4713:21 remember 4692:4 4696:20 4702:7 4720:11 4737:21 4738:10 reminding 4690:9 remove 4692:11 removed 4695:13 4733:9 repair 4719:15,22 4729:10 4743:6,23 4744:4 4750:17 4754:7 Repair's 4744:1 repairs 4695:23 4720:2 4729:7 4739:20,24 4741:23 4742:12 4744:12,17,22 4749:15 4755:15 repeated 4712:5 repeatedly 4706:18 replacement 4719:15, 22 4742:7 4754:7 replacements 4720:2 reply 4726:11 report 4727:21 4729:14 reported 4698:16 4724:18 4725:17 reports 4699:25 represent 4754:8 representations 4761:2,13 representative 4714:3 4720:7 representing 4730:15 represents 4760:18 reprioritization 4726:18 reprioritize 4726:8,12 4758:15 reprioritized 4726:17,	25 request 4710:13 4720:6 4733:10 4735:1 4740:14 requested 4724:1,12 4727:11 4732:21 requesting 4734:25 requests 4706:20 4732:25 4742:14 require 4699:20 4709:24 4725:11 required 4691:4 4695:15 4709:13 4722:9 4723:23 4726:15 4738:1 4739:5 4740:3 4762:3 requirement 4707:23 requirements 4692:20 4697:13 4699:5,19 4700:2 4704:4 4706:6 4751:23 4760:9 4761:21 resist 4702:7 4734:19 resolve 4725:3 resorting 4719:7 resource 4701:10 resources 4709:9 4717:3 4738:2 respect 4759:14 respond 4714:9 4741:4 4742:19 4753:4 4760:12 response 4749:9 responses 4689:15 4753:10 responsibility 4707:4 4712:23 4730:19 responsible 4690:18 result 4700:25 4717:10 4721:20 4727:13 resulting 4742:12 retaining 4748:10 returned 4725:21
--	--	---	--

revenue 4706:6 4707:23	rugby 4756:10	SDG 4763:9,10	September 4699:14
revenue-requirement 4718:18	ruled 4724:4	SDG&E 4690:5,18 4692:18 4693:7,11 4694:25 4696:6,19 4700:24 4702:15 4703:13,17,21 4704:11 4705:7 4706:23 4707:18,21,24 4708:3, 15 4710:19 4716:23 4721:12,19,22 4722:2, 4,5,8,11,13,14,16,18,21 4723:4,5,17 4724:16, 17,22 4725:3,9,11,15, 23 4726:5,7,12,13,20, 21 4728:19 4729:11,21 4730:15,16 4731:6 4732:3,14,20 4733:2,7, 9 4734:4 4738:17,20 4739:11,13,18 4740:3, 7,12,17 4741:3,16,19 4742:5,9,23 4744:4,10 4746:2,18,24 4747:17 4748:2 4749:18 4750:6 4751:4,8 4755:7,14,16 4756:5,9 4758:4,11,12, 20,24 4762:3 4764:18	service 4701:12 4720:18
review 4690:8 4693:20 4706:8 4709:1 4710:19 4712:17 4715:1,4,5 4716:11,14 4718:1 4726:19 4730:17,20,22 4732:15 4734:7,8 4737:11,16 4741:9,16 4745:13 4747:7 4748:1, 12 4749:19,23 4750:8 4756:15 4757:10 4760:22 4762:12	ruling 4689:13	SDG&E's 4707:17 4710:13 4721:14,16 4722:10,17 4723:11 4724:8 4725:7 4726:11 4727:1,4,5,9 4728:7,14 4729:1 4731:14,24 4733:5 4739:10,16,21, 22 4740:1,4,16 4744:13,23 4755:12 4759:3	set 4690:5 4694:14 4706:2 4719:3 4734:10 4740:10 4741:11
reviewed 4698:14 4716:10	runs 4751:7,21,25	SDG&E-T2-ALJ-05 4731:24	setting 4706:21 4750:2
reviewing 4717:6 4757:12	rush 4740:19	Section 4705:25 4721:21 4725:14 4728:4 4739:4 4755:7	settlement 4704:1
reviews 4712:6,16 4747:21	safety 4691:2 4694:18, 19 4697:10,12 4716:13 4726:6 4730:25 4731:17 4741:7 4751:11 4752:19	seeking 4690:12 4735:4 4748:22	severely 4702:16
revised 4699:21 4710:11 4722:14 4724:11,15 4725:9,15 4726:24 4727:12,15 4728:1,3,11 4740:17 4750:14 4755:23 4758:17,22	San 4689:1,9,21,25 4711:15,19 4712:7,19 4713:10 4714:3,6,18 4715:10,11 4716:6,12, 15,17 4717:7,8,9,12,20 4718:9,12,15,20,24 4719:12 4720:3,5,7 4721:15 4735:11,23 4736:10,23 4753:19,25 4754:5,24 4760:18	segment 4729:22,23	shared 4719:6
Reynolds 4691:15 4703:5 4721:8,10,11 4748:15 4753:9 4759:12 4760:11,14 4762:5,14 4765:19,20, 21,22	sanctioned 4704:1	Senate 4738:23	shifts 4711:20
RIDI 4750:14	sat 4700:10	senior 4700:8	shortly 4689:21
risk 4691:5 4693:1 4702:2 4706:4 4711:3,4 4714:9 4717:1 4722:8 4729:4,19 4736:10,19 4737:14 4751:1	satisfied 4740:9	separate 4715:5 4739:1	show 4708:12 4713:11, 12 4717:11 4718:18 4732:21 4733:22 4736:22,23 4740:4 4741:16 4752:8,18,21, 25 4756:9
risk-informed 4693:2	satisfy 4737:1 4758:2		showing 4698:15 4711:16 4712:2 4713:21,25 4714:2,13, 16 4715:11 4716:6 4717:14 4718:21 4719:1 4736:3,7 4740:17 4754:6,20 4755:1 4757:18 4765:7
Robert 4711:13	SB 4726:15 4752:2		shown 4745:22 4752:12
room 4700:10 4764:1	scale 4697:7		shows 4729:3 4730:20
roughly 4742:13	SCE 4749:23		side 4757:7,8 4762:18
RSE 4731:16 4736:14, 21,24	scheduled 4709:8		sign 4719:8 4754:13
RSES 4731:13,15	schema 4699:20		signal 4717:7
	science 4708:5		significance 4702:1
	scope 4724:5,13 4728:9		significant 4694:17 4732:4 4743:11
	scoping 4724:1,5,6,14		similar 4717:15 4742:6 4760:2
	scores 4717:22		simple 4730:5
	scrutinize 4706:19 4710:10		simply 4709:4 4716:3 4738:11 4748:19 4758:5
	scrutiny 4704:9 4709:24 4710:5,12 4717:24		singer 4700:7
	SD- 4727:18		single 4696:18 4698:11 4715:17,19 4736:14 4743:12 4745:25

4747:5,8 4754:12 4760:1,3,7 4763:15	4707:15 4712:1,17 4715:1 4750:24	stated 4690:24 4708:3 4738:22 4741:19 4742:9	substantiate 4707:19 4708:22
sitting 4696:14	spend 4690:9 4697:16 4709:9 4732:23 4736:11 4751:18 4763:1	statement 4690:1 4728:21	substantiation 4708:10
situation 4691:15		statements 4689:15 4728:17	substitute 4736:6
sizes 4718:14	spending 4695:13 4712:4,18 4715:2 4720:14,25 4721:2,14, 18,19 4722:19 4724:20, 24 4725:16 4727:7,10, 13,16,17 4728:8 4735:24 4740:20 4753:23 4757:3	states 4723:24 4724:7	success 4729:1
slide 4717:24		stating 4725:1	successful 4760:24
slides 4705:7		station 4730:4	sufficient 4721:23 4727:7 4741:15 4755:8, 17 4757:19 4758:5
slightly 4746:22 4750:14		statute 4757:11	suggested 4720:1
Slow 4700:12		Steel 4723:24	summers 4691:23
small 4701:7 4710:5,7 4730:3	spent 4699:22 4719:23 4723:4,17 4745:13 4752:9,12,20 4753:2 4763:23	step 4689:20 4702:22 4713:14 4750:4	super 4697:16
smart 4757:6	spirit 4690:23	steps 4720:22	supplemental 4726:22 4727:5,6 4740:3,4,10, 15 4758:25
snapshot 4698:1	split 4754:7	stick 4715:2 4728:21	support 4711:22,24 4712:5 4720:6 4721:18 4748:13
Socal 4742:5	stakeholder 4700:6	stopped 4751:13	supported 4720:5
solar 4723:9,15,20,22 4728:6	stand 4717:10	storage 4723:9,15,21, 22 4728:6	supporting 4759:17
solely 4727:4	standard 4693:20,22 4694:1,7 4714:4,5 4730:17,22,23 4731:10 4732:16 4735:12,14,15, 16,21,22 4736:8 4738:7 4747:24 4748:7 4749:21 4754:2,18 4756:11,12 4758:3,7	strategic 4712:4 4714:22 4715:20 4718:4,5 4720:19 4730:2	supports 4711:17
solve 4701:3 4757:18		strength 4750:22	supposed 4704:25 4719:22 4734:6,7 4762:11
sophisticated 4693:1 4720:8	standards 4722:13 4731:6 4756:5	strict 4760:17	Supreme 4724:4
sort 4708:19 4730:19	stands 4720:12	strike 4692:14	surely 4694:13
sounds 4754:8 4761:23	start 4689:24 4696:3,20 4709:23 4711:14 4713:15 4719:4 4721:8 4736:16 4740:25	strong 4700:7	suspect 4719:5
source 4739:20	started 4689:20 4702:15 4720:24 4729:21 4730:18 4735:24	structure 4696:18	system 4693:2 4695:19 4701:12 4710:22 4723:19
Southern 4689:9	starting 4689:21 4693:5,8 4711:1 4728:19 4737:7	stuck 4737:18	<hr/> T <hr/>
space 4700:1,20 4701:19 4704:16	startup 4697:9	stuff 4734:5	T2-09 4764:18
spare 4705:25	state 4691:19 4693:5 4696:11 4697:24 4699:7 4724:3,10	style 4705:22,23	table 4715:17,20,21,22, 24 4753:12
SPD 4716:12		subject 4690:21 4698:9 4755:22 4764:18	tables 4754:14
speak 4703:7 4743:7,9 4753:11		submitted 4710:19 4716:12 4717:5 4756:7	tag-team 4742:24
speakers 4689:18		submitting 4762:12	takes 4714:15
speaking 4692:1		subsequent 4719:15 4726:1	talk 4690:21 4694:10 4695:6 4703:13,17 4704:20 4733:25
specific 4691:2 4695:5, 17 4700:4 4708:4 4716:20 4724:22 4726:9 4738:7 4748:21 4749:14 4753:1 4762:10		substantial 4714:25 4718:5 4721:2	
specifically 4699:4 4704:25 4705:24			

talked 4729:5 4763:11	Thomas 4690:22	tones 4692:5	two-step 4737:21 4738:11
talking 4696:21 4699:12 4702:3 4709:21 4741:5,6 4744:4 4765:4,12	thought 4705:1 4754:5	tool 4730:9	type 4748:11
talks 4730:15 4731:25	thousands 4731:7 4743:5 4760:19,20 4761:9	tools 4699:6 4720:24 4730:7	<hr/> U <hr/>
tantamount 4705:12	threat 4697:11 4709:22 4710:4,20,23 4738:17	top 4731:21	ultimately 4732:14
target 4694:24	threshold 4721:21	topic 4724:4 4753:10	unable 4708:4
targets 4699:5 4751:8, 9	Thursday 4690:6	total 4695:21 4722:20 4744:23 4746:13	unanticipated 4692:21
team 4757:15 4763:23	tied 4712:1 4714:25 4719:14	touch 4707:13 4709:19	uncontested 4717:22, 23
teams 4763:17,19	Tier 4710:20 4723:16	touches 4692:23	undergrounding 4712:4 4714:22 4715:21 4716:21,24 4717:2 4718:4,5 4720:20 4721:17 4722:9,17,19,21 4723:2,5,6,11,18,23 4728:5 4730:2 4736:18
Tech 4690:21	time 4689:6,16 4690:3, 9,18 4691:13 4692:15 4693:3,13,23 4696:2, 15,21 4697:1,17 4698:13 4699:6,17 4702:8 4703:7,19 4705:19 4706:16 4708:8,18 4711:6 4712:8 4714:6 4719:23 4721:4 4722:5 4727:7 4729:4 4730:10 4731:1, 12,16 4732:10 4734:20 4735:16 4736:9 4741:20 4743:13 4745:8 4746:4,19,24 4756:5,16 4757:3 4761:11	tough 4706:13	underlying 4720:8
technology 4739:12, 13	timeframe 4690:10,12, 24 4691:6,8 4696:6 4697:14,23 4699:13,17 4700:9 4703:18 4712:6 4729:6,17 4730:6,8	town 4730:3	undermine 4726:19
tells 4736:14	times 4691:25 4723:1 4735:1 4749:1	track 4690:5 4704:24 4715:9 4724:6 4727:7, 12 4746:5 4754:1 4764:6	underspending 4725:24 4726:4
temptation 4702:3	timesheets 4708:8	tracked 4728:13 4746:2 4757:14	underspends 4758:13
tender 4691:22	today 4689:13 4690:3 4691:12 4692:8 4693:10 4695:16 4699:17 4702:13 4729:25 4730:7	tracking 4718:20 4746:5 4760:25	underspent 4725:20 4740:7 4758:23
terms 4704:10,13 4709:21 4710:6 4714:10,23 4715:3 4733:17 4735:2 4757:11	today's 4691:7 4702:5 4731:10	traction 4713:17	understand 4693:18 4698:25 4699:8,10 4702:3 4713:16 4720:4 4737:2 4742:4,20 4745:22 4749:13
territory 4698:1	told 4737:4 4756:10	tradeoffs 4714:10,12	understanding 4702:1
test 4709:15	ton 4697:12	transparency 4747:2	understood 4700:14
testimony 4715:13 4723:4,14 4724:17,20 4725:2,6 4726:22 4740:2 4742:21 4765:8	tone 4692:4	treated 4718:10	unexplained 4728:9
thing 4696:5,24 4698:5 4707:13 4715:9 4733:20 4735:19 4737:14 4745:3 4747:3 4750:24 4751:12		tribal 4701:11	unfairly 4718:10
things 4696:13,16,25 4697:4,22 4698:4 4701:24 4702:13 4704:3,13,15,22 4705:1 4730:1,25 4732:13 4735:21 4736:16 4752:10,22 4760:18 4761:6,7 4763:4,11,20 4765:2		trifling 4710:6,7	unforeseen 4706:3
Thinking 4703:6		trolling 4761:9	unfortunate 4709:20
thinks 4718:12		troubled 4705:8	unintelligible 4691:25
		troubling 4754:12	unit 4695:21 4727:18, 19,20,22
		true 4693:10 4694:10 4720:23 4736:6 4747:6 4754:19	United 4723:23
		trust-but-verify 4760:17	unjust 4738:18 4739:8
		turn 4689:22 4692:25 4711:9,13 4713:14 4716:9 4717:12 4722:15 4730:11,15 4735:8,13 4739:18 4740:24 4750:5 4763:25	
		TURN's 4735:11	

unjustified 4728:4	variability 4725:5	wildfire 4690:19,21 4691:2,5 4692:19 4693:11 4695:1 4696:3 4699:11 4702:2 4704:25 4706:4 4708:5, 13,17 4712:18 4713:11 4714:9 4715:1,4,8,12, 14 4716:3,10 4717:1 4720:9 4724:8 4726:14 4735:24 4737:3 4738:24 4747:21 4748:14 4750:3 4751:1 4754:2,14 4757:7	workers 4696:12
unmitigated 4709:4	vast 4715:11		working 4697:1 4701:15 4708:13,17 4727:21 4730:9
unreasonable 4704:21 4706:11 4738:18 4739:8 4745:1 4747:5 4752:15	vegetation 4691:22		workpaper 4765:11
unrelated 4726:1	verification 4761:5		workpapers 4750:17
unsophisticated 4735:23	verify 4760:22		worse 4718:24
untested 4739:12	versus 4723:24 4724:3 4732:1 4745:12 4762:20		worth 4757:4,9
unusual 4713:14	vetting 4705:2		WPM 4751:11
urge 4694:12 4737:21 4754:13 4761:1,12	videos 4697:22		write 4765:5,7
users 4763:5,12	view 4738:5 4754:21 4760:20	wildfires 4690:15,17 4691:16,18,20 4692:22 4693:5,9 4696:7 4731:18 4736:6 4738:17,19	written 4703:14 4721:9
utilities 4694:1 4695:25 4700:21,22 4701:18 4703:18 4704:18,23 4706:22 4709:25 4718:14,24 4734:25 4735:12,13 4746:22 4747:22 4749:21 4754:18 4757:4	violation 4756:13	wing 4697:25	wrong 4693:19,20 4694:4 4695:19 4705:14
utilities' 4694:5	virtually 4698:22 4718:6	Wings 4720:11 4721:1	WSD 4716:14
utility 4692:2 4693:5 4694:19,23 4695:24 4698:10 4699:24 4707:1,3 4709:4,8 4712:22,24 4719:6 4735:19,23 4737:4 4738:1 4739:2 4743:13 4748:25	visit 4693:7	witnesses 4740:14	<hr/> Y <hr/>
utility-caused 4690:15	visitors 4763:10	WMP 4692:12 4694:15, 20,24 4695:3 4699:5 4700:1 4704:4 4709:10, 14 4716:11,15,22 4717:5 4721:19 4725:2 4727:1 4728:12 4729:12 4731:25 4732:23 4734:5 4738:22 4739:9 4741:15 4744:15 4746:9,20 4751:7,10 4763:18	ya 4703:8
utility-compliant 4694:15	visits 4693:15	WMP-RELATED 4708:10	year 4690:20 4693:11 4695:11 4699:21 4724:3
utility-induced 4693:11	voting 4691:14 4706:18		years 4692:20 4693:25 4697:19 4702:4,16 4713:9 4726:2
<hr/> V <hr/>	<hr/> W <hr/>		Young 4729:14 4733:4 4737:11
valid 4718:12	wanted 4696:19 4729:17 4756:23 4759:12 4762:17	WMPs 4692:21 4717:10 4724:20 4725:6 4731:14	<hr/> Z <hr/>
valve 4709:25	warned 4726:18	WOLDEMARIAM 4764:3,14,24	zeroed 4695:12 4699:1
vantage 4693:20	warranted 4712:13 4735:12	wolves 4695:1	
	water 4724:3 4730:4	word 4703:7 4709:20	
	Water's 4724:10	work 4692:23 4696:16 4699:24 4701:11 4709:8,10,12,14 4710:3,16,19,21,23,24 4711:3 4716:21 4720:17 4735:25 4744:4 4751:20 4752:6, 15,23	
	wave 4724:25		
	ways 4701:15,23 4751:4		
	website 4727:24		
	weight 4725:1		
	wet 4691:20		
	whiplash 4691:20		
	WHITE 4721:6,12 4738:16 4755:4 4758:9		
	widespread 4725:5		