



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

Application of San Diego Gas & Electric
Company (U 902-E) for Approval of Smart
Meter 2.0 Proposal

A.25-12-012
(Filed December 18, 2025)

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**PROTEST OF THE UTILITY CONSUMERS' ACTION NETWORK TO APPLICATION
OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR APPROVAL OF
SMART METER 2.0 PROPOSAL**



Jane Krikorian
Staff Attorney

Utility Consumers' Action Network
404 Euclid Ave, Suite 377
San Diego, CA 92114
(619) 696-6966
jane@ucan.org

January 13, 2026

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Pursuant to Rule 2.6 of the Commission's Rules of Practice and Procedure, the Utility Consumers' Action Network (UCAN)¹ submits this Protest to the Application for Approval of Smart Meter 2.0 Proposal (Application), filed by San Diego Gas & Electric Company (SDG&E) on December 18, 2025. The Application first appeared on the CPUC Daily Calendar on December 18, 2025. Therefore, according to Rule 2.6(a), this Protest is timely filed.

I. INTRODUCTION

California Ratepayers continue to suffer the effects of rising electricity rates that have created an ongoing affordability crisis. The quarterly Electric Rates Report, published by the Public Advocates Office at the California Public Utilities Commission, continues to provide data showing how electricity rates of the three large Investor-Owned Utilities in California have substantially surpassed inflation over the past decade. For residential ratepayers in SDG&E territory, this translates to a 95% increase in rates compared to a 37% increase in the rate of inflation during the same time.² Due to this ongoing affordability crisis, any funding requests

¹ UCAN is a 501(c)(3) non-profit public benefit corporation dedicated to protecting and representing the interests of residential and small business customers in the San Diego Gas & Electric service territory. Approximately 98% of UCAN's members are residential customers. UCAN has been active in Commission proceedings since 1983 and strives to meet the Commission's goals for rates that are equitable and affordable for all ratepayers.

² <https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/251106-public-advocates-office-q3-2025-rates-report.pdf>, at slide 9.

from SDG&E need to be carefully scrutinized for necessity and reasonableness before Commission approval.

II. EFFECT OF THE APPLICATION ON PROTESTANT

UCAN is a 501(c)(3) non-profit public benefit corporation dedicated to representing and protecting the interests of residential and small business customers in the SDG&E service territory. Approximately 98% of UCAN's members are residential customers. UCAN has been active in Commission proceedings since 1983 and strives to meet the Commission's goals for rates that are equitable and affordable for all ratepayers. SDG&E's application requesting \$825 million dollars over seven years to replace its smart meter (SM) 1.0 infrastructure and technology with SM 2.0 - on an expedited schedule - directly impacts the economic interests of San Diego ratepayers. UCAN believes that the application will harm ratepayers by requesting unjust and unreasonable additional funding amidst the growing affordability crisis described above.

III. GROUNDS FOR PROTEST

In this Application, SDG&E requests authorization to recover SM 2.0 costs of approximately \$825 million between 2024-2031 including direct costs, contingency, overheads, and loaders.³ Additionally, SDG&E request approval of a new two-way, interest-bearing, Advance Metering Infrastructure Balancing Account (AMIBA) to track and recover authorized revenue.⁴ The Application also requests an expedited schedule.⁵ In light of the ongoing affordability crisis described above, UCAN finds all of these requests need much more scrutiny and review for necessity and reasonableness prior to Commission approval.

³ Application of San Diego Gas & Electric Company (U 902 M) for Approval of Smart Meter 2.0 Proposal (Application), filed December 18, 2025, at 1.

⁴ *Ibid.*

⁵ Application at 2.

IV. CATEGORIZATION AND NEED FOR EVIDENTIARY HEARINGS

UCAN agrees with SDG&E's request that the Application be categorized as ratesetting.⁶

However, UCAN disagrees with SDG&E that it has provided "ample supporting testimony, analysis, and documentation that provide the Commission with a sufficient record upon which to grant the relief requested."⁷

The Commission already denied SDG&E's previous SM 2.0 proposal in the 2024 General Rate Case (GRC) stating,

"This decision declines the Smart Meter 2.0 project for various reasons, including insufficient evidence of gas module failure, uncertainty of the supply chain status of Smart Meter 2.0 modules, inadequate information on replacing versus repair options, a supply chain issue of modules allowing interim repair options, a lack of supporting evidence analyzing and assessing project costs."⁸

The decision continued for several more pages with a detailed explanation for denying the SM 2.0 proposal and the deficiencies that needed to be addressed and included multiple Findings of Fact and Conclusions of Law regarding the proposal's deficiencies.⁹ The Commission cited to UCAN's multiple concerns regarding the SM 2.0 proposal in its final decision.¹⁰

UCAN anticipates the need for extensive review of the Application and testimonies to develop the record prior to the Commission making its decision regarding SDG&E's request for \$825 million dollars from ratepayers. As in the 2024 GRC, UCAN believes that there will be multiple material issues of fact in dispute with this Application and therefore requests the Commission include dates for evidentiary hearings in any schedule set for this proceeding.

⁶ *Id.* at 9 and see Rules of Practice and Procedure (Rules or Rule) 1.3(g).

⁷ *Ibid.*

⁸ D.24-12-074, 2024 General Rate Case (GRC) Decision, issued December 23, 2024, at 672.

⁹ *Id.* at 672-677; and see Findings of Fact 317-320 at 1010, and 329 at 1012; Conclusions of Law 157 at 1064, and 215-217 at 1072.

¹⁰ *Id.* at 666-667 and see fn's 2149-2155.

V. PROPOSED SCHEDULE

UCAN urges the Commission to reject SDG&E's proposed twelve-month schedule due to the large amount of money requested from ratepayers. Instead, UCAN proposes a schedule that conforms to Rule 2.1(c) with a deadline for resolving ratesetting proceedings in 18 months or less.¹¹ As noted in the previous section, the Commission rejected SDG&E's prior SM 2.0 proposal for serious deficiencies. Intervenors will need an appropriate amount of time to provide a meaningful review of the Application and supporting testimonies and see if the Commission's concerns have been addressed and the deficiencies cured. A twelve-month schedule is highly inappropriate for this Application and the \$825 million dollars requested from ratepayers.

Therefore, UCAN proposes the following schedule:

<u>ACTION</u>	<u>SDG&E DATES</u>	<u>UCAN DATES</u>
Application Filed	December 18, 2025	December 18, 2025
Protests/Responses	Approx. January 22, 2026	January 16, 2026
SDG&E Reply to Protests/Responses	February 2, 2026	February 2, 2026
Prehearing Conference	Approx. Feb. 5, 2026	February 16, 2026 ¹²
Scoping Memo Issued	Approx. Feb. 20, 2026	March 16, 2026
Intervenor Testimony	March 20, 2026	April 30, 2026
Concurrent Rebuttal Testimony	April 20, 2026	May 29, 2026
Rule 13.9 Meet and Confer Deadline ¹³	April 30, 2026	June 10, 2026
Evidentiary Hearings	Week of June 15, 2026	Week of July 27, 2026

¹¹ Rule 2.1(c) "The proposed schedule shall be consistent with the proposed category, including a deadline for resolving the proceeding within 12 months or less (adjudicatory proceeding) or 18 months or less (ratesetting or quasi-legislative proceeding)..."

¹² Rule 7.2(a): "A prehearing conference in an adjudicatory or ratesetting proceeding shall be held between 45 and 60 days after the initiation of the proceeding or as soon as practicable after the Commission makes the assignment."

¹³ Rule 13.9(a): "Unless the assigned Commissioner or Assigned Administrative Law Judge orders otherwise, no later than 10 calendar days after the submission of rebuttal testimony the parties must meet and confer, in person or via remote participation..."

Concurrent Opening Briefs	July 10, 2026	September 11, 2026
Concurrent Reply Briefs	July 24, 2026	September 25, 2026
Proposed Decision	October 30, 2026	December 15, 2026
Comments on Proposed Decision	November 19, 2026	January 15, 2027
Reply Comments on Proposed Decision	November 24, 2026	January 29, 2027
Final Decision	December 2026	April 2027

VI. CONCLUSION

For all the foregoing reasons, UCAN respectfully files this Protest to the SDG&E Application. UCAN urges the Commission to review D. 24-12-074, the 2024 General Rate Case decision, and all of the reasons SDG&E's prior SM 2.0 proposal was denied. UCAN urges the Commission to reject SDG&E's proposed twelve-month schedule and instead give intervenors additional time to thoroughly investigate this current SM 2.0 proposal for necessity and reasonableness and to make sure all of the Commission's previous concerns have been addressed.

Dated: January 13, 2026

Respectfully submitted,
/s/ Jane Krikorian
 Jane Krikorian
 Staff Attorney
 Utility Consumers' Action Network
 404 Euclid Ave, Suite 377
 San Diego, Ca 92114
 (619) 696-6966