

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



FILED

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)

01/13/26
04:59 PM
A2512012

**UTILITY CONSUMERS' ACTION NETWORK REQUEST FOR 18-MONTH
SCHEDULE ACCORDING TO RULE 2.1(c)**



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

**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)

**UTILITY CONSUMERS' ACTION NETWORK REQUEST FOR 18-MONTH
SCHEDULE ACCORDING TO RULE 2.1(c)**

Pursuant to Rule 2.6(d) of the Commission's Rules of Practice and Procedure, the Utility Consumers' Action Network (UCAN)¹ submits this Request for 18-Month Schedule According to Rule 2.1(c), in response to a Request for an Expedited Schedule (12-months) filed by San Diego Gas & Electric Company (SDG&E) on December 18, 2025, as Attachment A in its Application for Approval of Smart Meter Proposal 2.0. The Request for Expedited Schedule first appeared on the CPUC Daily Calendar on December 18, 2025. Therefore, according to Rule 2.6(a), this Request in response 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

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.

inflation during the same time.² Due to this ongoing affordability crisis, any funding requests from SDG&E need to be carefully scrutinized.

The current Request for Expedited Schedule suggests that the SM 2.0 Application be resolved in twelve months, by December 2026. UCAN urges the Commission to reject SDG&E's Request for Expedited Schedule and instead adopt a schedule according to Rule 2.1(c) with a deadline for resolving ratesetting proceedings in 18 months or less.³ UCAN believes this expedited schedule for SDG&E's \$825,000,000 request will be harmful to ratepayers by preventing an appropriate amount of time for meaningful investigation and review by intervenors. In response, UCAN submits this Request for 18-Month Schedule According to Rule 2.1(c).

II. EFFECT OF REQUEST

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 Request for Expedited Schedule in its Application requesting \$825 million dollars to replace its smart meter (SM) 1.0 infrastructure and technology with SM 2.0 directly impacts the economic interests of San Diego ratepayers. UCAN believes that the Request for Expedited Schedule will harm ratepayers by not

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.

³ 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)..."

allowing an appropriate amount of time for intervenors to assess and analyze the reasonableness of SDGE's request.

III. GROUNDS FOR REQUEST

In this Application, SDG&E requests an expedited schedule for its SM 2.0 costs of approximately \$825 million that it is requesting from ratepayers.⁴ In light of the ongoing affordability crisis described above, UCAN finds the expedited schedule request inappropriate because a request for \$825 million dollars from ratepayers needs much more scrutiny and review for necessity and reasonableness prior to Commission approval. Therefore, in response, UCAN submits this Request for 18-Month Schedule According to Rule 2.1(c).

IV. UCAN OBJECTIONS

In its Request for Expedited Schedule, SDG&E describes an “accelerating rate of SM 1.0 failures...” and that those “failures are growing faster than SDG&E can feasibly address.”⁵ Yet SDG&E also states that the SM 1.0 electric and gas modules were “expected to reach end-of-life between 2026-2028.”⁶ UCAN believes an inquiry should include an investigation into why this happening and why ratepayers paid for meters that stopped working sooner than expected and why a plan wasn't put into place to fix them if there was a problem with a certain part or a significant design failure. UCAN also has concerns that SDG&E plans to work with the same “incumbent vendor” who has “advised SDG&E to develop a transition plan to ensure continuity and mitigate risk.”⁷ UCAN believes part of the risk to ratepayers could be the incumbent vendor

⁴ Application of San Diego Gas & Electric Company (U 902 M) for Approval of Smart Meter 2.0 Proposal (Application), filed December 18, 2025, at Attachment A.

⁵ *Id.* at A-2.

⁶ *Id.* at A-1.

⁷ *Ibid.*

if their previous modules were defective or poorly designed and that this needs to be a part of the review prior to Commission approval for funding of a next-generation solution with the same vendor/supplier.

As noted in UCAN's Protest to SDG&E's Application for approval of its SM 2.0 proposal, 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. UCAN believes an expedited schedule is highly inappropriate and harmful to ratepayers who deserve a full investigation into SDG&E's statements regarding the failures and deficiencies of its SM 1.0 program. Before approval of its 2.0 program ratepayers should also know that those failures and deficiencies have been addressed. Rushing the schedule of intervenor testimonies will prevent the opportunity for a

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.

meaningful review of SDG&E's SM 2.0 proposal. Therefore, UCAN urges the Commission to reject the Request for Expedited Schedule for twelve months and instead adopt a schedule according to Rule 2.1(c) with a deadline for resolving ratesetting proceedings in 18 months or less.

V. CONCLUSION

For all the foregoing reasons, UCAN respectfully files this Request for 18-Month Schedule According to Rule 2.1(c). 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 Request for Expedited Schedule and instead give intervenors 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