



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED

01/12/26

04:59 PM

C2601016

Protector Brewery LLC,

Complainant,

vs.

San Diego Gas and Electric Company (U902E),

Defendant.

Case

Complaint
(Rule 4.2)

COMPLAINANT	DEFENDANT
Protector Brewery LLC 901 Bayfront Court, Suite 102 San Diego CA 92101 T: 630-995-1406 E-mail: mhall@redenriddell.com	San Diego Gas and Electric Company (U902E) Attn: Greg Anderson, Regulatory Tariff Manager 8330 Century Park Court, CP32F San Diego CA 92123 T: 858-654-1717 E-mail 1: ganderson@sdge.com E-mail 2: SDGETariffs@sdge.com
ATTORNEY FOR COMPLAINANT	
McCalister Hall, Esq. Reden Riddell 16885 Via Del Campo Court San Diego CA 92127 T: 619-758-3869 E-mail: mhall@redenriddell.com	

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A)

Protector Brewery LLC

COMPLAINANT(S)

vs.

(B)

San Diego Gas & Electric Company

DEFENDANT(S)

(Include Utility "U-Number", if known)

(for Commission use only)

(C)

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?

☒ YES

☐ NO

Has staff responded to your complaint?

☒ YES

☐ NO

Did you appeal to the Consumer Affairs Manager?

☐ YES

☒ NO

Do you have money on deposit with the Commission?

☐ YES

☒ NO

Amount \$ _____

Is your service now disconnected?

☐ YES

☒ NO

COMPLAINT

(D)

The complaint of _____ (Provide name, address and phone number for each complainant)

Name of Complainant(s)	Address	Daytime Phone Number
Protector Brewery LLC	901 Bayfront Court, Suite 102, San Diego, CA 92101	(630) 995-1406

respectfully shows that:

(E)

Defendant(s) _____ (Provide name, address and phone number for each defendant)

Name of Defendant(s)	Address	Daytime Phone Number
San Diego Gas & Electric Company	8306 Century Park Ct., San Diego, CA 92123	(619) 936-8484

(F)

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

Protector Brewery LLC ("Protector") submitted a request for new gas service and a meter installation at its location at 901 Bayfront Court, Suite 102, San Diego, CA, in May 2024 through SDG&E's Builder Portal. SDG&E's portal showed that the project was accepted in early June 2024. According to SDG&E's own published guidelines, "New service request forms will only be accepted if/when SDG&E receives all required information," which reasonably indicated to Protector that all required documentation had been submitted, reviewed, and approved, and that Protector had fulfilled its obligations at that stage of the process.

Despite this acceptance, SDG&E did not install the gas meter until October 2024 — a delay of nearly five months. During that period, SDG&E repeatedly introduced new requirements that had never been disclosed at the outset of the project and appeared to use these shifting conditions to justify the ongoing delay. These included: (1) a request for a revised gas-load study after acceptance, which was ultimately dropped once Protector pointed out SDG&E's misunderstanding and provided a minor clarification; (2) a previously unmentioned traffic-control plan requirement, which SDG&E abandoned days later after Protector inquired and provided alternatives; and (3) a requirement for detailed parking logistics months into the process, despite Protector and the building owner confirming that SDG&E could park anywhere on the property. SDG&E also issued an unexpected invoice late in the timeline; Protector paid it immediately upon receipt.

Despite Protector's efforts to satisfy every new requirement almost immediately, SDG&E continued to provide inconsistent explanations and changing conditions, including reliance on a vague "12-week" estimate that was never tied to any written standard, published timeline, or documented internal scheduling procedure.

As a result of SDG&E's delays, Protector was unable to obtain health-department approvals, could not operate its kitchen or host events, and suffered substantial operational and financial impacts while continuing to pay rent and loan obligations on a fully built-out space that could not open as intended. Protector submitted a written claim to SDG&E (Claim No. 351677), which SDG&E denied. Protector then sought clarification of the stated grounds for denial, but SDG&E declined to respond further. Protector also filed an informal complaint with the Commission's Consumer Affairs Branch, which was closed for lack of jurisdiction, leaving Protector with no remaining administrative avenue other than filing this Formal Complaint.

Protector now brings this Formal Complaint seeking Commission review of SDG&E's handling of the installation process and a determination as to whether SDG&E's conduct and delays were reasonable

(G) Scoping Memo Information (Rule 4.2(a))

(1) The proposed category for the Complaint is (check one):

☒ adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)

☐ ratesetting (check this box if your complaint challenges the reasonableness of a rates)

(2) Are hearings needed, (are there facts in dispute)? ☐ YES ☒ NO

(3) ☒ Regular Complaint ☐ Expedited Complaint

(4) The issues to be considered are (Example: The utility should refund the overbilled amount of \$78.00):

Protector does not believe an evidentiary hearing is necessary unless SDG&E disputes material facts that cannot be resolved through written submissions. The issues for the Commission to consider include whether SDG&E acted reasonably in delaying the installation of the gas meter for nearly five months after accepting the project in June 2024; whether SDG&E failed to provide timely or accurate information regarding the required next steps such as load studies, parking requirements, and billing; whether SDG&E adhered to its own published procedures for new gas-service installations; and whether SDG&E's shifting and late-disclosed requirements resulted in unreasonable delay to the customer.

- (5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.

Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09):	
Hearing (Example: 7/1/09)	

Explain here if you propose a schedule different from the above guidelines.

(H)

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

Protector respectfully asks that the Commission investigate SDG&E's handling of the service installation and determine whether its delays and shifting requirements constituted an unreasonable utility practice; require SDG&E to participate in ADG, meet-and-confer, or other Commission-facilitated resolution processes; direct SDG&E to provide a written explanation of its procedures for new gas-service installations and identify corrective actions if deficiencies are found; and issue any additional orders the Commission deems appropriate to ensure transparency, accountability, and reasonable customer service.

(I)

OPTIONAL: I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by electronic mail (e-mail). My/our e-mail address(es) is/are:

mhall@redenriddell.com

(J)

Dated San Diego, California, this 5 day of January, 2026
(City) (date) (month) (year)




Signature of each complainant

(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)

(K)**REPRESENTATIVE'S INFORMATION:**

Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative:	McCalister Hall, REDEN RIDDELL
Address:	16885 via Del Campo Court, Suite 320, San Diego, CA 92127
Telephone Number:	619-758-3869
E-mail:	mhall@redenriddell.com
Signature	

VERIFICATION
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

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

(L)

Executed on January 5, 2026, at San Diego, California
(date) (City)



(Complainant Signature)

VERIFICATION
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

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

(M)

Executed on _____, at _____, California
(date) (City)

Signature of Officer

Title

(N) NUMBER OF COPIES NEEDED FOR FILING:

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one defendant, then you must submit a total of eight (8) copies (Rule 4.2(b)).

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

(O) Mail paper copies to: California Public Utilities Commission
Attn: Docket Office

505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

PRIVACYNOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission ("CPUC") intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a public record and may be posted on the CPUC's website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available on-line for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.



Signature

1/5/2026

Date

Amanda Grover

Print your name

Exhibit A



Sean Haggerty <sean@protectorbrewery.com>

SDG&E: Upload Documents for 200000123941

1 message

CPMS@sdge.com <CPMS@sdge.com>

Thu, May 30, 2024 at 9:22 AM

To: sean@protectorbrewery.com

Hi,
The following documents were uploaded for 200000123941 on 05/30/2024 for [901 BAYFRONT COURT, STE. 102 92101](#).
Documents uploaded = 1
LOAD INFO FORM - SDGE GAS 1.pdf

Thank you,
-The SDG&E Builder Services Portal Team
For more information, please visit our Builder Services Resource Center at sdge.com/builder-services.

SDG&E® values your privacy. View our [privacy policy](#) and [privacy notice](#).

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[8330 Century Park Court, San Diego, CA 92123](#)

Exhibit B



Project Summary

Status On: Wednesday, June 5th 2024, 8:57:55 am

User: sean@protectorbrewery.com

◀ Dashboard

901 BAYFRONT CT

Start Date: 06/04/2024

Project Number: 300000720465

Access Code: 141659

Customer:

Project Notes

Date	From	Subject	Note
06/04/2024 02:17 PM	System	Other	Application service request # 200000123941, submitted on 06/04/2024, has been accepted by SDG&E Design & Project Management and a new project has been initiated # 300000720465.

Exhibit C

Cell: (630) 995-1406

Protector Brewery L.L.C.

San Diego's 1st Award Winning Organic Craft Brewery.

www.protectorbrewery.com [[protectorbrewery.com](http://www.protectorbrewery.com)]

8680 Miralani Dr #128

San Diego, CA 92126

(p) 858.757.9160

Facebook: fb.com/ProtectorBrewery [[fb.com](https://fb.com/ProtectorBrewery)]

Instagram: instagram.com/ProtectorBrewery [[instagram.com](https://instagram.com/ProtectorBrewery)]

Twitter: twitter.com/ProtectorBrew [[twitter.com](https://twitter.com/ProtectorBrew)]

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On Tue, Aug 13, 2024 at 3:28 PM Sean Haggerty <sean@protectorbrewery.com> wrote:

Thank you, I know the Owner of the building is ok with your crew parking anywhere you need. Please let me know anything you need and thank you for the quick response.

Cheers,

Sean Haggerty

Founder, President, & Head Brewer of Protector Brewery

Email: sean@protectorbrewery.com

Cell: (630) 995-1406

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Twitter: twitter.com/ProtectorBrew [[twitter.com](#)]

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On Tue, Aug 13, 2024 at 3:22 PM Gonzalez, Manuel E <MGonzal5@sdge.com> wrote:

Sean,

Got word that parking a truck inside is a no-go. Good news is that the split tee riser being close to that column is not an issue, but I need to check the design with the gas engineer. Ill provide an update as soon as I have one.

Thanks,

**Email is the best form of
communication for me**

Manuel Gonzalez

Project Planner II

M 619-676-4450

E mgonzal5@sdge.com

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Exhibit D

Email is the best form of
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Manuel Gonzalez

Project Planner II

M 619-676-4450

E mgonzal5@sdge.com

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This email originated outside of Semptra. Be cautious of attachments, web links, or requests for information.

 **901 Bayfront Court SDG&E Marked-Up Parking Map.pdf**
3438K

Sean Haggerty <sean@protectorbrewery.com>

Wed, Aug 21, 2024 at 7:12 AM

To: "Gonzalez, Manuel E" <MGonzal5@sdge.com>

Cc: Shane Boswell <sboswell@cltvt.com>, "cory@protectorbrewery.com" <cory@protectorbrewery.com>, Madison Rumic <mrumic@cltvt.com>, Mark Simons <msimons@cltvt.com>, "Maderazo, Robert" <RMaderazo@sdge.com>, Kerrie Ozarski <kerriel@reefrealestate.com>, William Winters <wwinters@aceparking.com>

Good morning, Manuel. Just following up to ensure this will satisfy? Also, will that pay app come through today? Thank you.

Cheers,

Sean Haggerty
Founder, President, & Head Brewer of Protector Brewery
Email: sean@protectorbrewery.com
Cell: (630) 995-1406

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On Tue, Aug 20, 2024 at 3:12 PM Sean Haggerty <sean@protectorbrewery.com> wrote:

Hi Manuel,

Attached is the Marked-Up SDG&E Parking Map. in **GREEN** is where I labeled where the SDG&E crew can park on the property and where the gas manifold is located. The Property line (Common Area) is highlighted in **GREY**. So, the crew has some options to pull their trucks onto the property and within 30 ft of the gas manifold. Please let me know as soon as possible if this works, thanks!

Cheers,

Sean Haggerty
Founder, President, & Head Brewer of Protector Brewery
Email: sean@protectorbrewery.com
Cell: (630) 995-1406

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On Mon, Aug 19, 2024 at 4:08 PM Gonzalez, Manuel E <MGonzal5@sdge.com> wrote:

Sean,

Thanks for chatting. As discussed, traffic control plan request # is 91017 with the City of San Diego. Let me know if you can get that expedited on your end with them.

Couple more things that need to happen before we can set the meter:

- Please send over a marked-up map where a crew can park at least (2) vehicles on your property. Please include property lines in the diagram. This option is not guaranteed, as I still need to ensure my gas crew is ok with the proposed parking locations (they need to ensure safety, close enough distance, etc.)
- I just sent the gas load study back to the engineer for some minor modifications. Once I get that back, I can issue this to my support coordinator so she can issue the payment to you. Please note it takes 1-2 business days to create a cash receipt.
- After that is paid, and we get traffic control back then SDG&E can issue the design sketch/service order so you can call and schedule the work. You will still need to ensure inspections are posted, and billing is set up but we can cross those bridges when we get there.

Overall, getting much closer.

Thanks,

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communication for me**

Manuel Gonzalez

Project Planner II

M 619-676-4450

E mgonzal5@sdge.com



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From: Gonzalez, Manuel E

Sent: Monday, August 19, 2024 8:13 AM

To: 'Sean Haggerty' <sean@protectorbrewery.com>

Cc: Shane Boswell <sboswell@clvt.com>; cory@protectorbrewery.com; Madison Rumic <mrumic@clvt.com>; Mark Simons

Exhibit E

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[Quoted text hidden]

Gonzalez, Manuel E <MGonzal5@sdge.com>

Thu, Aug 22, 2024 at 8:01 AM

To: Sean Haggerty <sean@protectorbrewery.com>

Cc: Shane Boswell <sboswell@clvt.com>, "cory@protectorbrewery.com" <cory@protectorbrewery.com>, Madison Rumic <mrumic@clvt.com>, Mark Simons <msimons@clvt.com>, "Maderazo, Robert" <RMaderazo@sdge.com>, Kerrie Ozarski <kerriel@reefrealestate.com>, William Winters <wwinters@aceparking.com>

Hi Sean,

Please allow 1-2 days for cash receipt to be created by the accounting department. I also received word this morning by a crew that they will be able to park in the loading dock – meaning now we don't have to wait on TCP. Lastly, it was mentioned that trash pickup is on Wednesday, so when calling to schedule please communicate that with the scheduler.

Rest assured we will do everything we can to get this meter set sooner.

Thanks,

**Email is the best form of
communication for me**

Manuel Gonzalez

Project Planner II

M 619-676-4450

E mgonzal5@sdge.com



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Exhibit F

Any update on the timeline on this? Obviously we are very anxious to get this meter installed!

Thank you

CLTVT

Shane Boswell / Project Superintendent
sboswell@cltv.com / 602-323-6698

CLTVT.com

On Jul 24, 2024, at 4:44 PM, Gonzalez, Manuel E <MGonzal5@sdge.com> wrote:

Shane,

Thanks. Just revised the gas load study and got it to my gas engineer. Ill let you know if he has any comments. Additionally, you should see a request for elevated pres the next few days.

Thanks

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communication for me**

Manuel Gonzalez

Project Planner II

M 619-676-4450

<image001.png>

E mgonzal5@sdge.com

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<image002.jpg>

<image003.png>

<image004.png>

<image005.png>

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From: Shane Boswell <sboswell@cltv.com>

Sent: Tuesday, July 23, 2024 3:08 PM

To: Gonzalez, Manuel E <MGonzal5@sdge.com>

Cc: Sean Haggerty <sean@protectorbrewery.com>; Kerrie Ozarski <kerriel@reefrealestate.com>; Madison Rumic <mrumic@cltv.com>; Cory Haggerty <cory@protectorbrewery.com>; Mark Simons <msimons@cltv.com>

Subject: [EXTERNAL] Re: Protector Gas Meter Release

Sorry all, see attach...

This email originated outside of Semptra. Be cautious of attachments, web links, or requests for information.



Shane Boswell / Project Superintendent
sboswell@cltv.com / 602-323-6698

CLTVT.com [cltv.com]



On Jul 23, 2024, at 2:51 PM, Shane Boswell <sboswell@cltv.com> wrote:

Manuel

Please see the gas load chart with added anticipated future gas loads.



Shane Boswell / Project Superintendent
sboswell@cltv.com / 602-323-6698

CLTVT.com [cltv.com]

On Jul 22, 2024, at 3:04 PM, Gonzalez, Manuel E <MGonzal5@sdge.com> wrote:

Hi Shane,

Thanks for getting back to me. As discussed, you need minimum 1000 CFH in order to qualify for 5psi. You did mention you are anticipating future load. What will those be? If the addition of what you have installed now + the future loads is 1000CFH or more you should be ok to qualify for a 5lb meter set.

Thanks,

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communication for me

Manuel Gonzalez

Project Planner II

M 619-676-4450

E mgonzal5@sdge.com

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[\[linkedin.com\]](#)

<image005.png>

[\[instagram.com\]](#)

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From: Shane Boswell <sboswell@clvt.com>
Sent: Thursday, July 18, 2024 11:12 AM
To: Gonzalez, Manuel E <MGonzal5@sdge.com>
Cc: Sean Haggerty <sean@protectorbrewery.com>; Kerrie Ozarski <kerriel@reefrealstate.com>; Madison Rumic <mrumic@clvt.com>; Cory Haggerty <cory@protectorbrewery.com>; Mark Simons <msimons@clvt.com>
Subject: [EXTERNAL] Re: Protector Gas Meter Release

Manuel,

I have consulted with our engineer, please see his response below...

We have requested the use for elevated natural gas pressure due to the distance from the gas meter to the TI space (over 500') and future gas loads. Using the low gas pressure will create a financial hardship due to space constraints of accommodating the large pipes through very congested areas of the building. Please request 5 psi gas pressure and meter because of these reasons.

Thank you
E

Esteban Flores PE

Principal Engineer
Flores Mechanical

Engineering
[531 Encinitas Blvd Ste 104](#)
[Encinitas CA 92024](#)
[\(760\) 505-2045](#)



Shane Boswell / Project Superintendent
sboswell@cltv.com / 602-323-6698

CLTVT.com [cltv.com]

On Jul 17, 2024, at 12:52 PM, Gonzalez, Manuel E <MGonzal5@sdge.com> wrote:

Hi Shane,

Gas engineering has notified me that you do not qualify for a 5lb meter set serving pressure. ¼ PSIG is what this would qualify for since this is below 1000 CFH. Let me know if you can make it work so I can notify the gas engineer.

Thanks

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communication for me**

Manuel Gonzalez

Project Planner II

M 619-676-4450

E mgonzal5@sdge.com

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[\[instagram.com\]](#)

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From: Shane Boswell <sboswell@cltv.com>

Sent: Monday, July 15, 2024 3:47 PM

To: Gonzalez, Manuel E <MGonzal5@sdge.com>

Cc: Sean Haggerty <sean@protectorbrewery.com>; Kerrie Ozarski <kerrie@reefrealestate.com>; Madison Rumic <mrumic@cltv.com>; Cory Haggerty <cory@protectorbrewery.com>; Mark Simons <msimons@cltv.com>

Subject: [EXTERNAL] Re: Protector Gas Meter Release

Great News! Thank you!!!



Shane Boswell / Project Superintendent
sboswell@cltv.com / 602-323-6698

CLTVT.com [cltv.com]

On Jul 15, 2024, at 3:41 PM, Gonzalez, Manuel E <MGonzal5@sdge.com> wrote:

Heard back from the assigned gas engineer not too long ago, he will prioritize 901 bayfront court this week.

Thanks,

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communication for me

Manuel Gonzalez

Project Planner II

M 619-676-4450

E mgonzal5@sdge.com

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From: Shane Boswell <sboswell@cltv.com>
Sent: Monday, July 15, 2024 3:40 PM
To: Gonzalez, Manuel E <MGonzal5@sdge.com>
Cc: Sean Haggerty <sean@protectorbrewery.com>; Kerrie Ozarski <kerriel@reefrealestate.com>; Madison Rumić <mrumić@cltv.com>; Cory Haggerty <cory@protectorbrewery.com>; Mark Simons <msimons@cltv.com>
Subject: [EXTERNAL] Re: Protector Gas Meter Release

Thank you Manuel!



Shane Boswell / Project Superintendent
sboswell@cltv.com / 602-323-6698

CLTVT.com [cltv.com]

On Jul 15, 2024, at 1:57 PM, Gonzalez, Manuel E <MGonzal5@sdge.com> wrote:

Hi Shane.

I still haven't heard back from gas engineering. I do have a contact/colleague there at that department that will see if he can get some answers for me – he is looking into this as I type this email.

As mentioned before, I am doing everything I can to push this one through. I believe I have been responsive, so I would appreciate it if your team/ownership kept communication through one SDGE contact, rather than try to get updates through several different avenues. I understand you are eager to get a gas meter ASAP, but having to provide updates to different people within the company only slows down my productivity. The fact that the existing meter set assembly is in an alcove and is a 5lb meter set makes it so that it **has to** be thoroughly reviewed and approved by gas engineering.

I will reiterate the urgency to the gas engineering team. Feel free to reach out to me via email if you have any questions.

Thanks,

**Email is the best form of
communication for me**

Manuel Gonzalez

Project Planner II

M 619-676-4450

E mgonzal5@sdge.com

Follow Us:

<image001.png>

<image002.jpg>

[facebook.com]

<image003.png>

[twitter.com]

<image004.png>

[linkedin.com]

<image005.png>

[instagram.com]

Exhibit G

REDEN | RIDDELL

16885 Via Del Campo Court, Suite 320
San Diego, CA 92127
Telephone: (619) 758-3869
Facsimile: (800) 746-5015
www.redenriddell.com

September 19, 2025

VIA U.S. MAIL AND EMAIL

San Diego Gas & Electric Company
Attention: Claims Department
PO Box 129831
San Diego, CA 92112
SDGENewClaim1@sdge.com

Re: Protector Brewery LLC – Gas Meter Installation Delay

R|R Client: Protector Brewery LLC
R|R File No.: 9640.0001
SDGE Claim No: 351667
Subject: Demand for Payment

To Whom It May Concern:

This firm represents Protector Brewery LLC (“Protector”) regarding its claim against San Diego Gas & Electric Company (“SDG&E”) arising from SDG&E’s failure to timely install a gas meter at Protector’s downtown San Diego location, 901 Bayfront Court, Suite 102. This letter renews Claim No. 351677 and serves as formal demand for payment.

Protector submitted a gas meter request in May 2024, consistent with instructions from its contractor, Cultivate, Inc. A comparable request at Protector’s Miramar location had taken only one week. Yet the meter was not installed until October 2024. During this five-month delay, SDG&E subjected Protector to conflicting requirements, shifting timelines, and a late invoice of approximately \$5,000. Everything else with the build-out was complete and this was the only remaining item preventing health department clearance, occupancy approval, and full operation. Protector even attempted to resolve the issue independently, reaching out to the City of San Diego and seeking approval to engage a licensed third party to complete the connection. Those efforts were denied because only SDG&E could perform the installation, leaving Protector’s hands tied and wholly dependent on SDG&E’s inaction.

Because the meter was not installed, Protector could not operate its kitchen while still carrying monthly rent and loan obligations of over \$22,000. As a result of SDG&E’s unreasonable delay, Protector incurred direct, documented losses of no less than \$45,500 in fixed obligations and fees. Total losses exceed \$80,000, including lost food and beverage revenue and missed event opportunities.

Protector originally submitted a claim to SDG&E on September 14, 2024, including supporting documentation (W-9, voided check, revenue breakdown, and bank statements). That claim was

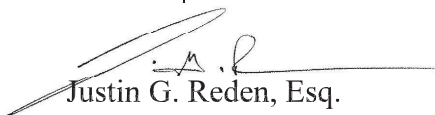
ignored for months before being denied without adequate justification in July 2025. For reference, a true and correct copy of the originally submitted claim is attached hereto as **Exhibit A** and incorporated herein.

Under Public Utilities Code § 451, SDG&E must provide just, reasonable, and adequate service. Its conduct here fell far below that duty. **Protector demands immediate payment of \$80,000**, which reflects the full scope of losses caused by SDG&E's delay. This figure is supported by at least \$45,500 in direct, documented costs and additional consequential damages from lost food revenue, reduced beverage sales, and missed event opportunities. Importantly, Protector continues to experience financial harm as a result of the delay and reserves the right to amend and increase its demand as further losses are quantified.

Payment should be made by check payable to Protector Brewery LLC and delivered to this office no later than October 17, 2025. If SDG&E fails to resolve this matter by that date, Protector will escalate by filing a formal complaint with the California Public Utilities Commission and pursuing all available remedies.

This demand is made without waiver of any rights, all of which are expressly reserved.

REDEN | RIDDELL



Justin G. Reden, Esq.

(jreden@redenriddell.com)
JGR/tld

Enclosure: SDGE Claim Request

To Whom it May Concern,

I submitted claim number 351677 to SDG&E on 14SEP2024 and have received no response. I have included a copy of the claim request form in the amount of \$45,500 explaining the loss of revenue due to fault by SDG&E. I have also included copies of our company's W-9, voided check, & revenue breakdown at the 901 Bayfront Court location. The revenue breakdown shows revenue with and without a kitchen operating. Copies of bank statements from JUN2024 & OCT2024 show deposits and expenses from our business. We requested the gas meter installation MAY2024, we were intentionally misled to believe the gas meter would be installed by JUN or JUL2024, but the gas meter was finally installed the first week of OCT2024.

We suffered severe financial hardship because we could not open our kitchen. Our sales data proves the claim amount for lost revenue. If I do not receive a response & settlement for the \$45,500 requested, I will hand this to my legal team to pursue further action against SDG&E.



15 Nov 2024

Sean Haggerty
President of Protector Brewery LLC
8680 Miralani Drive, Ste. 128
San Diego, CA 92126
sean@protectorbrewery.com
630-995-1406



External Claim Request Form

Claim Number : 351677

Claimant First Name	Sean
Claimant Last Name	Haggerty
Claimant Email Address	sean@protectorbrewery.com
Claimant Best Contact Phone	(630) 995-1406
Claimant Alternate Phone	
Claimant Mailing Address	8680 Miralani Drive, Ste. 128
Claimant Mailing City	San Diego
Claimant Mailing State	California
Claimant Mailing ZIP Code	92126
Customer Account Number	
Incident Date	6/15/2024
Time of Incident	1:00 PM
Is location of Incident same as mailing address?	No
Incident Address Description	Protector Brewery LLC 901 Bayfront Court Ste. 102 San Diego, CA 92029
Incident Address	901 Bayfront Court, Ste. 102
Incident Address City	San Diego
Incident Address State	California
Incident Address ZIP Code	92101
Description of Incident	\$500 per day in Lost Revenue since 15JUN2024 due to SDG&E's refusal to install a gas meter so we can get a Health Department inspection & open our kitchen for business. Still have not received an installation date for Job#300000725002.
Was a minor (person under the age of 18) involved in the incident?	No
Was a motor vehicle involved in the incident?	No
Was there damage to your property?	Yes
Were you injured as a result of the incident?	Yes
Description of Personal Injury/Death	Significant Financial Injury to Protector Brewery LLC
Total Amount of Claim	45,500
How was the claim amount determined?	We requested a gas meter in MAY2024 and still have not been given a date for a gas meter installation to open our kitchen at our business (Protector Brewery LLC) since we completed the project on 15JUN2024 and we were ready to open the kitchen. We cannot get the Health Department signoff till the gas meter goes in and we have lost \$500 per day since then in Lost Revenue. Loss is calculated by beverage only sales, which are approximately \$500 per day. Food would have added at least another \$500 per day in Revenue.
Witness First Name	Cory
Witness Last Name	Haggerty
Witness Phone	(619) 379-1614
Email Address	cory@protectorbrewery.com
Have you contacted your insurance carrier?	No
Attachments (combined size cannot exceed 20 MB)	
I agree	True

20%

Protector Hide Site Week over Week (WoW)
Average Sales Growth

Dates	Weeks	Revenue	% Increase / Decrease
	0	\$0	N/A (Base Year)
20-23JUN2024	1	\$1,087	
27-30JUN2024	2	\$1,596	46.83%
04-07JUL2024	3	\$4,260	166.92%
11-14JUL2024	4	\$3,455	-18.90%
18-21JUL2024	5	\$3,010	-12.88%
24-28JUL2024	6	\$3,140	4.32%
01-04AUG2024	7	\$3,582	14.07%
07-11AUG2024	8	\$4,762	32.95%
12-18AUG2024	9	\$3,903	-18.05%
19-25AUG2024	10	\$6,521	67.08%
26-01SEP2024	11	\$4,260	-34.68%
02-08SEP2024	12	\$3,462	-18.74%
09-15SEP2024	13	\$4,651	34.36%
16-22SEP2024	14	\$5,100	9.66%
23-29SEP2024	15	\$3,478	-31.81%
30-06OCT2024	16	\$4,304	23.76%
07-13OCT2024	17	\$7,496	74.14%
14-20OCT2024	18	\$8,641	15.28%
21-27OCT2024	19	\$5,048	-41.59%
28-03NOV2024	20	\$5,845	15.80%
04-10NOV2024	21	\$9,560	63.55%

\$7,317.85

Average Weekly Sales Since
Opening Kitchen

Protector Hide Site Weekly Sales



Kitchen Opens (Only Open 3 Days)

Kitchen Fully Open

Sales summary

Data as of Nov 15, 2024, 9:16 AM (PST)

DATE RANGE:

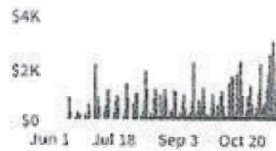
June 1, 2024 - November 15, 2024

SELECTED LOCATIONS:

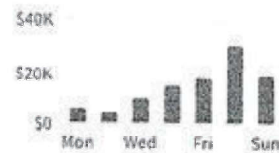
Protector Brewery

SALES TRENDS

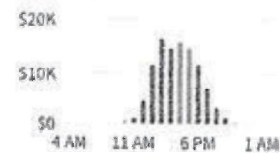
Sales by day



Day of week (totals)



Time of day (totals)



REVENUE SUMMARY

Net sales	\$102,977.84
Gratuity	\$0.00
Tax amount	\$7,721.36
Tips	\$19,350.16
Paid in total	\$0.00
Total amount	\$130,049.36

CASH SUMMARY

Expected closeout cash	\$519,069.56
Actual closeout cash	\$516,641.83
Cash overage/shortage	-\$2,427.73
Expected deposit	\$6,163.46
Actual deposit	\$6,366.07
Deposit overage/shortage	\$202.61

NET SALES SUMMARY

Gross sales	\$106,035.64
Sales discounts	-\$3,057.80
Sales refunds	\$0.00
Net sales	\$102,977.84

CASH ACTIVITY

Total cash payments	\$8,687.07
Cash adjustments	-\$2,427.73
Cash refunds	\$0.00
Cash before tipouts	\$6,259.34
Tipouts tips withheld	\$0.00
Total cash	\$6,259.34

TIP SUMMARY

Tips collected	\$19,350.16
Tips refunded	\$0.00
Total tips	\$19,350.16

PAYMENTS SUMMARY

Payment type	Amount	Tips	Grat	Refunds	Total
Credit/debit	\$101,963.63	\$19,350.16	\$0.00	\$0.00	\$121,313.79
Amex	\$13,735.09	\$2,835.27	\$0.00	\$0.00	\$16,570.36
Discover	\$1,248.17	\$269.97	\$0.00	\$0.00	\$1,518.14
Mastercard	\$20,705.90	\$3,848.34	\$0.00	\$0.00	\$24,554.24
Visa	\$66,274.47	\$12,396.58	\$0.00	\$0.00	\$78,671.05
Gift Card	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Cash	\$8,687.07	\$0.00	\$0.00	\$0.00	\$8,687.07
Other	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total	\$110,650.70	\$19,350.16	\$0.00	\$0.00	\$130,000.86

UNPAID ORDERS SUMMARY

Unpaid amount	\$48.50
---------------	---------

SERVICE MODE SUMMARY

Net sales	\$102,977.84
Total guests	5,777
Avg/Guest	\$17.83
Total payments	5,736
Avg/Payment	\$19.29
Total orders	5,776
Avg/Order	\$17.83
Turn time	31:40

SALES CATEGORY SUMMARY

Sales category	Items	Net sales	Gross sales
Bottled Beer	12,195	\$78,799.52	\$81,588.34
Food	1,116	\$11,831.34	\$11,915.92
Liquor	19	\$192.00	\$205.00
NA Beverage	426	\$1,638.45	\$1,643.00
No Sales Category Assigned	533	\$7,235.73	\$7,390.38
Wine	347	\$3,280.80	\$3,293.00
Total	14,636	\$102,977.84	\$106,035.64

11/15/24, 5:16 AM

Sales summary

REVENUE CENTER SUMMARY

Revenue center	Items	Net sales	Gross sales
Bar	14,634	\$102,952.84	\$106,007.64
Online Ordering	2	\$25.00	\$28.00
Total	14,636	\$102,977.84	\$106,035.64

DINING OPTION SUMMARY

Dining option	Orders	Net sales	Gross sales
No Dining Option	5,770	\$102,926.84	\$105,983.64
Dine In	1	\$26.00	\$26.00
Online Ordering - Takeout	5	\$25.00	\$28.00
Total	5,776	\$102,977.84	\$106,035.64

SERVICE / DAYPART SUMMARY

Service / day part	Orders	Net sales	Gross sales
Dinner	3,024	\$54,020.58	\$55,595.69
No Service	17	\$442.99	\$445.99
Lunch	2,735	\$48,514.27	\$49,993.96
Total	5,776	\$102,977.84	\$106,035.64

TAX SUMMARY

Tax rate	Taxable amount	Tax amount
CA STATE TAX	\$99,427.28	\$5,965.75
CA COUNTY TAX	\$99,417.45	\$247.48
CA SPECIAL TAX	\$99,427.28	\$1,508.13
Non Taxable	\$3,550.56	—

DISCOUNT SUMMARY

Discount	Count	Amount
Employee Discount - Check	3	\$14.80
Employee Discount - Item	4	\$53.00
First Online Order for Pickup Save 20%	3	\$3.80
Happy Hour (10 OZ Beer)	678	\$892.00
Happy Hour (16 OZ Beer)	1,321	\$1,536.00
Happy Hour (Cocktails)	8	\$13.00
Hotel Discount	111	\$303.40
Manager Comp - Check	1	\$9.00
Manager Comp - Item	7	\$38.00
Neighborhood Discount	10	\$30.23
Open % Check	13	\$41.87
Open % Item	7	\$29.90
Open \$ Check	1	\$2.00
Open \$ Item	1	\$0.80
Reward Dollars	18	\$90.00
Total discounts	2,186	\$3,057.80

VOID SUMMARY

Void amount	\$2,329.85
Void order count	130
Void item count	284
Void amount %	2.3%

How likely are you to recommend Toast?

X

Not at all likely 0 1 2 3 4 5 6 7 8 9 10 Extremely likely

Exhibit H



SDG&E Claims Administration
8306 Century Park Court CP41K
San Diego, CA 92123-1548

October 17, 2025

Justin Reden, Esq.
Reden | Riddell
16885 Via Del Campo Court, Suite 320
San Diego, CA 92127

Re: Your Client: Protector Brewery, LLC
Reden | Riddell File: 9640.0001
SDG&E Claim No.: 351677

Dear Mr. Reden,

Please note that San Diego Gas & Electric Company ("SDG&E") has completed its investigation into your client's above referenced claim, and are providing disposition thereof in writing.

After thorough research into the timeline of events related to providing gas service to your client's new business, Protector Brewery, located at 901 Bayfront Court, Suite 102, we must respectfully maintain a denial of liability.

While we empathize that your client may have incurred costs during the period that new gas service was pending, the SDG&E Planner provided an expected timeline of up to 12 weeks for the gas service installation to be completed. Additional time was added to the project due to paperwork being filled out incorrectly by the building Owner and/or your Client, necessary gas load studies, parking logistics and a delay in receiving the billing application. Any delays or logistical hurdles were not due to the negligence or unreasonable actions of SDG&E.

To that end, we must respectfully deny your client's claim for damage. If you have any questions or wish to discuss this matter further, please contact me. Respectfully yours,

Kenyon Carroll
Claims Advisor
619-936-8484

Exhibit I

PUBLIC UTILITIES COMMISSION

320 W. 4th STREET, SUITE 520
LOS ANGELES, CA 90013



October 21, 2025

File No:702262

Sean
c/o Protector Brewery LLC
16885 Via Del Campo Ct Ste 320
San Diego, CA 92127

Subject: Commission File No: 702262 for Complaint with San Diego Gas & Electric Company

Dear Sean:

The Consumer Affairs Branch (CAB) of the California Public Utilities Commission (CPUC) assists consumers in resolving complaints against regulated utility providers. Upon reviewing the complaint submitted against **San Diego Gas & Electric Company**, you noted that Protector [Brewery] is represented by [legal] counsel in the matter.

As CAB does not have jurisdiction over legal matters between consumers and utility providers, we are unable to offer further assistance at this time. We recommend continuing to engage directly with the utility to work toward a resolution. When legal proceedings conclude, if you require additional assistance, you may contact our office.

We regret that we cannot be of further assistance in this matter.

Sincerely,

Written Operations Unit
Consumer Affairs Branch
1-800-649-7570
www.cpuc.ca.gov