



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

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

Application 22-05-015
(Filed May 16, 2022)

CONSOLIDATED

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

Application No. 22-05-016
(Filed May 16, 2022)

**JOINT PETITIONERS
NOTICE OF EX PARTE COMMUNICATION**

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January 30, 2026

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**JOINT PETITIONERS
NOTICE OF EX PARTE COMMUNICATION**

Pursuant to Rule 8.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the Joint Petitioners (Natural Resources Defense Council (NRDC), CALSTART, and Powering America's Commercial Transportation (PACT), Advanced Energy United (AEU), Tesla, Walmart, the City of San Diego, and the Electric Vehicle Charging Association (EVCA)) hereby provides notice of the following *ex parte* communication. On Friday, January 30, 2026, at 11:00 a.m., the Joint Petitioners met with Drew Hodel, Senior Advisor on Climate, Legal and Intergovernmental Affairs to President Reynolds, and Julian Buchwalter, Advisor to Commissioner Douglas, via WebEx. The virtual meeting was requested by the Joint Petitioners, no written materials were provided, and the meeting lasted approximately 30 minutes.

The Joint Petitioners' participants in this meeting were Beth Hammon, Senior EV and Infrastructure Advocate; Heather Werner, Deputy Director, Energy Division, City of San Diego; Jamie McGovern, Senior Manager, Utility Partnerships, Walmart Energy; Julie Clark, Counsel to Walmart; Adam Happel, Manager, Retail EV Charging, Walmart; Rhiannon Davis, Director of Government Affairs, Electrify America; Jeremy Wiley, Electric Utility Rates and Programs Lead, Electrify America; and Bill Ehrlich, Senior Policy Advisor, North America Charging Policy and Rates, Tesla.

During this meeting the Joint Petitioners summarized and discussed their filed Joint Petition for Modification of Decision 24-12-074 in San Diego Gas & Electric Company's (SDG&E) 2024 General Rate Case, Applications 22-05-015 and 22-05-016 (Consolidated), including removal of the funding cap for the Electric Rule 45 Electric Vehicle Infrastructure Memorandum Account (EVIMA) and confirmation that Rule 45 must remain open to all eligible applications through at least the current rate-case cycle. Petitioners discussed the negative impact caused by the cap on the EVIMA, which has significantly disrupted Rule 45 implementation by leading SDG&E to close the tariff to new applications and terminate or suspend numerous in-flight projects, creating uncertainty for customers, charging developers, and local governments pursuing transportation electrification investments.

Petitioners explained that these outcomes were not anticipated when the decision was adopted and are inconsistent with the statutory framework established under Public Utilities Code Section 740.19, which contemplates continued operation of utility EV infrastructure rules through the current GRC cycle with costs subject to later reasonableness review. Petitioners emphasized that the requested modification would restore continuity and predictability for

infrastructure deployment while preserving the Commission's authority to review and determine cost recovery in a future proceeding.

Representatives of charging providers and the City of San Diego described the practical impacts of the Rule 45 closure, including cancelled or delayed projects, stranded development costs, and risks to deployment timelines and public funding commitments, particularly for projects serving capacity-constrained and disadvantaged communities. Petitioners also noted that maintaining regulatory stability is especially important given broader uncertainty surrounding federal funding and policy for transportation electrification, and that lifting the EVIMA cap would help avoid introducing additional uncertainty in California during this period.

Petitioners concluded by reiterating that the requested modification is a narrow correction intended to align implementation of Rule 45 with Commission intent and statutory requirements, while ensuring that all costs recorded to the EVIMA remain subject to future Commission reasonableness review.

Respectfully submitted,

/s/ Beth Hammon

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Dated: January 30, 2026