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**FILED**

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

Application of Southern California Gas Company (U904G) to Submit Its 2025 Risk Assessment and Mitigation Phase Report.

Application 25-05-010

And Related Matter.

Application 25-05-013

**ADMINISTRATIVE LAW JUDGE’S RULING ENTERING CORRECTED SAFETY POLICY DIVISION’S 2025 SEMPRA RAMP EVALUATION REPORT INTO THE EVIDENTIARY RECORD**

This ruling enters the corrected Safety Policy Division’s (SPD) San Diego Gas and Electric (SDG&E) and Southern California Gas Company (SoCalGas), collectively referred to as Sempra, 2025 Risk Assessment and Mitigation Phase (RAMP) Evaluation Report (Evaluation Report), attached to this ruling as Attachment A, into the evidentiary record of this proceeding. Attachment B of this ruling contains a redline version addressing corrections.

On October 10, 2025, the assigned Administrative Law Judge (ALJ) entered the Evaluation Report into the evidentiary record of Applications (A.) 25-05-010 and A.25-05-013 affirmed the comment schedule set on the Assigned Commissioner Scoping Memo and Ruling issued on August 11, 2025.

In opening joint comments, timely filed on November 17, 2025, Sempra noted a discrepancy between the Global Observations and Historical Progress

Graphic sections of the Evaluation Report.<sup>1</sup> Sempra notes that while the Global Observations Section finds the Historical Progress Graphic section of the Sempra 2025 RAMP out of compliance with the Risk-Based Decision-Making Framework (RDF) guidelines recommending remedial action, the discussion in the body of the Evaluation Report finds that section aligned with the RDF guidelines.<sup>2</sup>

SPD has reviewed the report and found that the finding in the detailed discussion is incorrect and has amended the text on pages 174 and 175 to reflect the correct finding in the Global Observations Section. During review, SPD noted other typographical errors which this version corrects. Below is a list of corrections in the report for reference.

- Page 4: Inserted missing reference to Decision (D.) 22-10-002
- Page 22: Corrected footnote 55 with correct decision reference [Old]: "D.24-05-064 Appendix A at Row 20." [New]: "D.22-10-002, at 27-28."
- Page 23: Corrected footnote 54 with correct decision reference [Old]: "D.24-05-064, Appendix A at A-14." [New]: "D.22-12-027, Appendix A, Rows 19, 22, and 23, at A-14."
- Page 171: Corrected appropriate decision reference [Old]: "Phase 2 Decision D.22-12-027," [New]: "Phase 1 D.22-10-002,"
- Page 171: Corrected footnote 320 with correct decision reference [Old]: "SoCalGas/SDG&E 2025 RAMP Ch. SCG\_SDG&E-Risk 8 Cybersecurity, at 1." [New]: "D-22-10-002, at 27-28."

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<sup>1</sup> Sempra Joint Opening Comments at 21.

<sup>2</sup> Evaluation Report at 21-22 (Global Observation #5), 174.

- Page 174-175: Corrected finding and narrative, consistent with Global Findings section [Old]: "the Historical Progress Graphic section to be aligned with RDF guidelines." [New]: "that while the historical graphic displays cybersecurity activity, it does not fully meet the requirement in D.22-10-002 (*see* at 27-28 of D.22-10-002) for historical progress graphics: "The IOUs shall provide graphics of historical progress in their RAMP reports that clearly illustrate what safety work has been accomplished and what work remains to be done. The graphics should be consistent with the IOU's safety goals and should provide information on risk mitigations and progress over at least the two immediately preceding RAMP cycles."

In addition, consistent with the Risk-Based Decision-Making Framework (RDF) adopted in D.22-12-027 and modified in D.24-05-064, risk reduction is measured as the difference between monetized pre-mitigation and post-mitigation risk values (LoRE x CoRE). However, the Cybersecurity historical graphic does not depict baseline-to-residual monetized risk trajectories across the last two RAMP cycles. The absence of this monetized risk trajectory limits the graphic's ability to demonstrate risk-reduction progress on the same basis used for decision-making and CBR calculations."

None of the corrections listed above are significant enough to trigger a new comment period.

**IT IS RULED.**

Dated March 4, 2025, at San Francisco, California.

/s/ PAULA GRUENDLING

Paula Gruending  
Administrative Law Judge

**ATTACHMENT A**

**Safety Policy Division's 2025 Sempra RAMP Evaluation Report**

## **Attachment B**

### **Safety Policy Division's 2025 Sempra RAMP Evaluation Report Annotated Corrections**