BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Establish Energization Timelines.	R.24-01-018 (Filed January 25, 2024)

SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) BIANNUAL ENERGIZATION REPORT

PUBLIC VERSION

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April 1, 2026

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Pursuant to Ordering Paragraph ("OP") 18 of California Public Utilities Commission ("CPUC" or "Commission") Decision ("D.") 24-09-020, San Diego Gas & Electric Company ("SDG&E") hereby submits its March 31, 2026 Biannual Energization Report ("the Report"). The Report is comprised of a narrative (**Attachment A** hereto) and an accompanying data spreadsheet (**Attachment B** hereto). SDG&E is concurrently submitting a motion for leave to file under seal the confidential version of the Report.

Respectfully submitted,

/s/ Roger A. Cerda

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ATTACHMENT A

SDG&E ENERGIZATION TARGET DATA AND REPORTING NARRATIVE

ENERGIZATION TARGET DATA AND REPORTING NARRATIVE

I. REPORT SUMMARY

On September 17, 2024, the California Public Utilities Commission (CPUC or Commission) issued Decision (D.) 24-09-020, which established statewide average and maximum timelines and targets for energization requests processed under the Investor-Owned Utilities (IOUs) Electric Rules as well as for certain upstream distribution capacity upgrades. In compliance with Ordering Paragraph (OP) 6 of D.24-09-020 (Decision), San Diego Gas & Electric (SDG&E) hereby submits this Energization Target Data and Reporting Narrative.

This report is intended to support CPUC oversight of energization timelines and compliance with statewide targets, ensuring transparency and accountability in the delivery of timely energization services. In accordance with D.24-09-020, SDG&E hereby provides "information describing how the timelines they track align with the energization targets adopted herein, using the data reporting tools that each large electric IOU already uses, and complying with the adopted data template by providing more individualized narrative explanations where necessary."[1] The information below accompanies the report workbook, providing explanations and offering context and detail to supplement the data provided.

SDG&E remains committed to enhancing the overall customer experience through enhanced communication, greater transparency, and more seamless engagement; elements that may not directly correlate with accelerated timelines. In tandem, SDG&E has implemented several process and system improvements aimed at streamlining energization workflows within the constraints of SDG&E's current legacy systems and lack of additional funding to address these constraints. In the absence of an approved funding mechanism, these improvements have been made within the bounds of existing resources; however, they do not fully achieve the requirements set forth by the Commission in D.24-09-020. In order to fully meet the granular tracking and reporting and enhanced communications required by D.24-09-020, modernizing and automating legacy systems is necessary. These improvements come at significant cost and cannot be fully realized without dedicated funding support.

II. BACKGROUND

In accordance with Pub. Util. Code 932 (a) (2), to meet California's decarbonization goals, new customers must be promptly connected to SDG&E's distribution system, and existing customers seeking to add load must have services upgraded in a timely manner. Senate Bill (SB) 410 and Assembly Bill (AB) 50 required the CPUC to establish reasonable average and maximum energization targets. Accordingly, the CPUC issued Order Instituting Rulemaking (R.) 24-01-018 on January 30, 2024, to implement those provisions. SB 410 also required the CPUC and all California electrical corporations to engage in activities that promote timely energization, while AB 50 required them to meet energization timeline requirements and make changes to their distribution planning processes.

D.24-09-020 was issued on September 17, 2024, and was made effective immediately. D.24-09-020 clarifies that the intention of establishing the average and maximum energization targets timelines for the IOUs is to focus on steps within the large electric IOU's control, which can

[1] D.24-09-020, p. 59.

accelerate the overall energization process for customers. The Decision established eight (8) Statewide Steps to Energization and differentiated IOU and customer responsibilities. D.24-09-020 acknowledged that IOU and customer responsibilities are not always sequential, and at times are conducted concurrently. In addition to setting average and maximum timelines, D.24-09-020 established new tracking and reporting requirements for each of the IOUs, as well as specific IOU requirements for customer outreach and communications to enhance transparency.

SDG&E has and will continue to play a critical role in achieving California's decarbonization goals through prompt connection to its distribution infrastructure. As described in subsequent sections of this narrative, SDG&E continues to pursue enhancements to the customer experience, to accelerate energization project timelines, and to systematically track and report on each of the new requirements mandated by D.24-09-020.

SDG&E has implemented coordinated initiatives to improve the customer energization experience and, within existing resources and funding, modernize systems and processes used across internal teams supporting energization projects. These efforts recognize that energization is a multi-stage process involving multiple handoffs, systems, and stakeholders, requiring improved coordination, transparency, and accountability.

As part of these efforts, SDG&E routinely solicits feedback from external stakeholders that are representative of builders, contractors, affordable housing developers, and others engaged with our energization process to gather feedback on customer needs and areas for improvement across all tariff types covered by this report. SDG&E also surveys customers who have recently completed energization projects to obtain additional insights. This ongoing stakeholder feedback allows SDG&E to continuously adjust its processes and drive ongoing improvements. The regular input received helps SDG&E identify emerging customer needs, refine operational workflows, and further enhance transparency and communication throughout the energization process.

These insights have informed an actionable plan aligned with the Decision's compliance requirements, and highlight the need for technology improvements across multiple internal teams, systems, and manual processes utilized today to energize projects. Primary improvements include implementing a single point of contact, reducing manual steps and handoffs. The intake process, timelines, customer communications, builder portal usability, and overall coordination of the energization process have been improved. Collectively, these changes support reduced energization timelines and the proactive communication required by the Decision.

III. OBSTACLES, TRENDING INFORMATION AND REPORT FINDINGS

A. Obstacles

1. Aligning The Eight Energization Steps

SDG&E has traditionally employed a project management framework known as "Stage Gates." This approach has been effective in providing structured oversight and governance for general project execution, particularly in managing schedules, resources, and deliverables, as well as communicating key milestones with the customer. However, this framework historically did not include specificity in delineating all of the distinct customer and IOU roles and responsibilities that occur within the project lifecycle. Additionally, it does not fully align with the eight-step energization process, which outlines a comprehensive sequence of activities required to bring a customer's energization project to completion.

Energization projects typically involve a range of interdependent activities such as engineering design, permitting, construction, inspections, and energization. These activities are rarely executed in isolation or in a fixed order. Instead, they often occur simultaneously or in overlapping phases to optimize project timelines and reduce delays. For example, SDG&E may be actively securing permits at the same time the customer is performing trenching work to fulfill the requirements of the "customer site readiness" step. This overlap of utility and customer activity, while often necessary to accelerate project timelines, creates challenges in tracking and reporting at a granular level. The concurrent nature of these tasks makes it difficult to clearly measure progress within a linear or phase-based reporting framework. While SDG&E is working towards aligning its current process to the eight energization steps, system limitations that constrain its ability to comprehensively track and differentiate IOU-attributable and customer- related time throughout the energization timelines remain an obstacle.

Absent significant and costly system enhancements, mapping SDG&E's existing processes to each of the eight steps set forth in the Decision presents significant challenges that may yield inconsistencies and unreliable data elements at the individual step level. As a result, when adding and averaging the sum of the total calendar/business days of each of the eight statewide steps, the resulting average does not accurately reflect SDG&E's overall energization timelines. This is further explained below.

Although SDG&E's existing system and processes did not initially align completely with the eight steps in the Decision, SDG&E made significant improvements aligning data and processes to the CPUC's expected results. With respect to these eight steps, SDG&E has been and will continue to be transparent with the CPUC and customers and is actively working on enhancing communications, timelines, tracking, and reporting as much as possible within the confines of budgetary limitations for this incremental work.

2. IT System Enhancements

The Decision introduces expanded requirements for tracking, reporting, and communicating energization timelines and project status, which exceed the capabilities of SDG&E's current systems. SDG&E remains unable to fully populate the reporting requirements and meet the full compliance requirements of D.24-09-020 absent significant system investments. SDG&E continues to highlight a critical need for IT system enhancements to meet the requirements outlined in D.24-09-020. Existing gaps in data tracking and transparent communications have been acknowledged by both SDG&E and the CPUC. These gaps include but are not limited to limitations in disaggregating IOU and customer time within a project lifecycle, communicating energization timelines according to the eight steps, and enhancing the tracking of all customer communications. Please see the Reporting Gaps section below for additional information regarding IT System Enhancements.

SDG&E remains committed to implementing these requirements to the extent it is feasible within existing constraints. It is important to acknowledge that these activities were not previously scoped or funded within current GRC authorized budgets.

B. Trending Information and Overall Report Findings

1. Intake Process Enhancements

As part of SDG&E's broader strategy to enhance the customer intake experience and align with future-state automation and self-service capabilities, several initiatives are currently underway to streamline intake operations and improve the overall customer experience.

SDG&E identified multiple opportunities to redesign the customer application process within the Customer Energization Portal[2] to provide a guided, step-by-step experience that aligns with the CPUC's requirements in D. 24-09-020. These enhancements are intended to reduce errors, improve submission completeness, and support faster processing by clearly directing customers through each required input. In parallel, SDG&E has identified opportunities to refine the intake process to ensure we collect the necessary information upfront and educate customers on how to enter information properly, enabling accurate routing to the appropriate planning teams.

As part of this modernization effort, SDG&E has transitioned from its previous workflow to the adopted eight-step energization workflow, enabling clearer alignment with the statewide energization process and more transparent communication with customers. In conjunction with this transition, SDG&E has developed tailored workflows for underground, overhead, Rule 45, and applicant design projects, shifting the intake approach toward the type of work requested rather than the tariff category. This work-type-based model improves customer understanding, reduces confusion associated with tariff distinctions, and enhances the accuracy of application routing.

Additionally, SDG&E has implemented an Intake Coordinator Agent referred to as the SDG&E Virtual Assistant that supports customers with basic intake processing tasks such as answering common questions and guiding customers through required steps. The SDG&E Virtual Assistant provides customers with energization education, process guidance, and portal navigation assistance. It is now available on the project resources webpage to support a more seamless and intuitive customer journey.

To support system and process enhancements, SDG&E is evaluating opportunities to improve efficiency through a more standardized intake process. This includes reviewing current workflows to identify inconsistencies and streamline how customer requests are received and processed. By establishing a consistent intake framework, SDG&E aims to reduce errors, improve processing speed, and create a more scalable and responsive experience for customers.

2. Reporting Parameters

SDG&E is reporting on Customer-driven Electric Rule 15, 16, 15/16, 45, 15/45, and Main Panel Upgrade (MPU) jobs with a completed application between January 31, 2023, through December 31, 2025. The data set includes jobs initiated prior to the timeline compliance requirements. The data set excludes solar only jobs, Rule 15, Rule 16, and Rule 15/16 jobs that are driven solely by SDG&E business operations as well as Rule 16 jobs that are triggered by a Rule 20 project. SDG&E's source data was retrieved on January 2, 2026. It is possible that from the date of retrieval to the date of submission of this report, project statuses have changed, including

[2] The Customer Energization Portal is currently known as the "Builder Services Portal" and will be updated to "My Project Center" in 2026

energization status. In accordance with updated guidance received from the CPUC, SDG&E will continue to report jobs (active and energized with a completed application date on or after January 31, 2023) on a rolling, biannual basis or until the CPUC issues revised guidance.

As previously noted, SDG&E's existing systems do not fully align with the eight statewide steps to energization. To report end-to-end timelines, SDG&E calculated the total time between Step 2 and Step 8[3]. At this time, SDG&E is unable to remove customer dependencies accurately, so they are included in the end-to-end calculations. For SDG&E, the data point for the start of Step 2 corresponds to receiving a complete application. The data point for the end of Step 8 or Energization is more nuanced. Because not all jobs include meters, SDG&E has implemented a multi-step reasoning check. A standardized approach for all jobs was designed to accommodate the unique variations associated with each job type:

- For Rule 15-only jobs and Rule 45, Step 8 concludes when the transformer is set because at this point the job is 'ready for service.'
- For Rule 16 jobs, Step 8 concludes when the meter is set, if a meter is required for the job.
- For Rule 15/16 combination jobs, Step 8 concludes at the first meter set date.
- For MPU, Step 8 concludes the same day as "reconnection."

As noted above, the data set that informed the summary tables in the aggregate tab contains energized jobs with a completed application date between January 31, 2023, and December 31, 2025. However, many of the jobs included in the data set are not required to meet the energization targets adopted by the Decision, as the completed application dates pre-date the Decision's effective date of September 17, 2024 and do not fall under the compliance requirements.

3. Customer Requested Energization Date

The "Customer Desired Energization Date" included in the data set is derived from the date provided by the customer to SDG&E during the initial request. As this date is customer-supplied, it is often aspirational and may not reflect the practical constraints or requirements associated with the customer's project execution. For example, a customer may enter a placeholder energization date in an effort to submit their request, or a date that is entirely infeasible. SDG&E engages with customers during the application process to align expectations and establish realistic timelines. This collaboration helps reconcile customer urgency with utility feasibility. Consequently, the originally submitted Customer Desired Energization date is often revised. Tracking the changes in the desired energization date is not currently a system capability therefore SDG&E's data set represents the energization date requested by the customer in the initial inquiry, prior to the customer working with an SDG&E representative. The date does not reflect any modifications or adjustments agreed upon with the customer during the application process.

4. Customer Requested Load

SDG&E's data collection for customer requested load estimates is primarily driven by inputs submitted through the Customer Energization Portal during the initial service inquiry. Customers are

[3] Step 1 (intake) begins with an individual job creation when an initial request is received and ends when a completed application is received to establish the applicant final submittal. The AFS established date (start of Step 2) is when the energization timeline begins.

prompted to provide estimated electrical load based on the type of service requested. Customers will manually input the estimated load in kW. These initial estimates often represent potentially inflated values, as they are provided prior to any formal load study. Additionally, data accuracy may be compromised if customers mistakenly enter amperage values instead of kW, despite the portal's request for kW input. Throughout the project lifecycle, SDG&E engages with customers to validate and refine the load estimate, culminating in a formal load study.[4] At present, the undiversified load value submitted during the initial inquiry remains the sole data point available for querying the customer's requested load addition.[5]

In cases where a meter has not been installed, the absence of historical site data further complicates efforts to report actual site capacity. These limitations directly affect the data quality of the "Site Capacity & Capacity Requested" section of the workbook, which includes the following data fields:

- "Total Site Capacity at Time of Customer's Application for Service (kW)"
- "Total Site Capacity Requested (kW)"
- "Additional Capacity (kW) installed for future electric load deployment (as applicable)"
- "Capacity Request Category: <1MW, 1MW to 2MW, >2MW"

It is important to note that these data quality challenges are confined to service-level reporting and do not impact SDG&E's ability to provide upstream distribution capacity and serve customers' load requests. To improve accuracy and reliability in future reporting, SDG&E is actively evaluating enhancements to its requested capacity load and data collection and validation processes.

5. Permitting Data

SDG&E can only provide data for instances where SDG&E requires permitting, which may include multiple permits. SDG&E does not have the capability to report on customer-required permitting. Additionally, SDG&E is unable to provide the amount of time associated with permitting due to the inability to track and report on all communications between the Authorities Having Jurisdiction (AHJ) and SDG&E. Not all jobs included in the data set require permitting; therefore, some data points are marked as "N/A" (Not Applicable). Lastly, the available data may not tell the full story: permitting deliverables and approval requirements can be impactful to timely Energization, as permit review timelines, inspection scheduling, and jurisdictional coordination, many of which occur outside SDG&E's direct control, may influence overall energization readiness from the customer's perspective

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[4] Load studies are submitted to SDG&E's distribution planning team to evaluate whether sufficient upstream distribution capacity exists to accommodate a customer's load request. Column M indicates whether the specific job and its associated load addition have triggered an upstream distribution capacity upgrade.

[5] Total load is determined by the customer, often using a calculator in SDG&E's Customer Energization Portal. SDG&E may later adjust these values to be more accurate.

IV. SUPPLEMENTAL REPORTING REQUIREMENTS

A. Upstream Capacity Upgrade Projects

In accordance with the Decision, SDG&E has identified the energization projects with upstream capacity upgrade dependencies in Appendix B.[6] For this March 31, 2026 filing, SDG&E reports five upstream distribution capacity upgrades that were triggered by energization requests. For each upgrade, SDG&E provides the date the need for the capacity upgrade was identified,[7] the date the upgrade was completed (if applicable), and the total associated costs for completed upgrades.

B. Constraints to Infrastructure Deployment

Infrastructure deployment is subject to a range of constraints that impact project timelines and execution. SDG&E collaborates with regional partners to address these challenges, which often involve navigating complex approval processes across multiple regulatory and environmental entities. Projects located on protected land, federal property, or within close proximity to sensitive areas such as airports typically require multi-agency coordination. For example, the Federal Aviation Administration (FAA) conducts detailed reviews of pole height calculations, which can be extensive. Similarly, permits required by Caltrans may take many months to be processed and approved. Municipal moratoriums may also temporarily suspend development to address public concerns or infrastructure needs, while the California Environmental Quality Act (CEQA) requires thorough environmental impact assessments to protect ecosystems and public health.

Customer funding constraints are a common issue. While the utility collects an engineering fee to cover preliminary design efforts, customers may put their projects on hold due to funding. These projects could remain on hold for an extended period of time until the customer is able to acquire funding to move forward or until the customer decides to cancel, either of which can impact energization timelines and execution.

Land rights, such as neighboring developments or the need to secure new easements can also cause delays. If a new development shares a lot line with another property and a solution cannot be found that satisfies the neighboring lot owner, the new business job will be on hold or canceled.

Finally, material procurement presents another critical constraint, often influenced by factors outside of the IOU's control but overlapping with IOU-controlled steps. Challenges surrounding domestic and international supply chain shortages can intersect with project milestones and have the potential to significantly delay the availability of essential components, thereby affecting energization timelines.

In response to an increase in new business driven by statewide decarbonization goals combined with the shared objectives of improving the customer experience, reducing energization timelines, and meeting expanded tracking and reporting requirements, SDG&E is actively evaluating

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[6] D.24-09-020, pp. 48 - 49.

[7] SDG&E does not separately track the specific date on which an upstream capacity upgrade is formally "identified," as there are often iterative discussions with customers to align load requests and project timelines, which can refine or adjust the upstream capacity requirements. For purposes of this report, SDG&E has identified and reported the date on which the upstream capacity need was initially flagged through engineering studies or project reviews.

ways to optimize existing resources and enhancing its operational capabilities to best support the increase in new business demand.

Navigating these challenges requires careful planning, coordination, and flexibility to adapt to the various obstacles that arise during infrastructure deployment, all of which are considerations as SDG&E is updating its energization process.

C. Timeline Data Reporting

While SDG&E does complete each of the IOU activities described in the 8-step energization process, the activities are not tied together in the same way, presenting challenges identifying data points that detail each milestone. SDG&E identified available data points that most accurately represent the definitions prescribed by the Commission. Process refinement is ongoing to help data align more closely with the Commission's definitions in the future.

An example where SDG&E continues actively working to modify its practices to align with the Commission's definitions is the application of the terms "rejected" and "cancelled" job applications. SDG&E has successfully enabled a process wherein if a job was created but lacks an AFS, it indicates that the customer was unable to provide all the necessary information to proceed with their energization request and is now characterized as "rejected." Currently, the reasons for these rejections must be manually populated by SDG&E for reporting.

To provide the most accurate data possible, SDG&E has engaged all business units that are involved in the energization process to identify all available data points and to distinguish between customer and utility dependencies. Subject Matter Experts continue to support solutioning ways to close data gaps. In the case of easements and permitting, it has required close partnership with the municipalities to better understand their processes.

As of the current reporting period, SDG&E is implementing solutions where data gaps have been identified and quick fixes are available. Simultaneously, SDG&E is identifying where more complex solutions are needed. SDG&E is committed to continuing this effort and clearly communicating its progress with customers.

D. Legacy System Data

The ability to catalog job-specific details for energization projects that exceed energization timeline targets are currently limited by SDG&E's existing systems. As presented in the aggregate summary, SDG&E has indicated jobs that are known to be meeting the adopted average for the full report parameters (January 31, 2023 -December 31, 2025). However, SDG&E emphasizes that many of the jobs predate the compliance requirement date of September 17th, 2024, to meet these targets. Furthermore, due to system limitations, SDG&E is currently unable to provide a narrative for each job that exceeds the average or maximum energization target since IT system enhancements are still needed to determine these statuses. In potential future enhancements, SDG&E aims to standardize this process and related narrative data fields for consistency and simplified data collection.

E. Environmental and Social Justice Barriers and Efforts

Currently, during the customer energization request process, SDG&E does not track whether a customer's project is in an Environmental and Social Justice (ESJ) community and does not ask customers to self-identify during the application process. While SDG&E can track this data once the

end-user has been identified by way of billing account, wherein a tax-id, address and CARE/FERA program eligibility and enrollment are established, this data is not readily available at the time of planning a job.

SDG&E currently incorporates underserved community indicators into its project reporting through its Geographic Information System (GIS). This system enables the identification of projects that meet criteria outlined in Public Utilities Code Section 1601(e), and this information has been included within this report. Specifically, SDG&E's GIS platform integrates the following data sources and methodologies:

- **Section 1601(e)(3):** SDG&E identifies projects located within areas designated as among the most disadvantaged 25 percent in the state, based on the most recent CalEnviroScreen data published by the California Environmental Protection Agency.
- **Section 1601(e)(4):** SDG&E identifies communities in which at least 75 percent of public-school students in the project area are eligible to receive free or reduced-price meals under the National School Lunch Program. This is achieved by overlaying school district data with project geographies.

SDG&E is committed to providing equitable access to energy for all and continues its efforts to reach customers fitting the demographics identified through Access and Functional Needs. SDG&E has made significant strides in rolling out programs that support customers and contractors within ESJ categories and reduce barriers to energization. When reviewing the average energization timelines for jobs within all ESJ community types, the data suggests similar energization timelines as Non-ESJ Communities.

Table 1[8]

Community Type	Tariff Energized Job Count	Average Applicant Final Submittal ("AFS") to Energized (Business Days) by Tariff	MPU Energized Job Count	Average Applicant Final Submittal ("AFS") to Energized (Business Days) by MPU
ESJ Community	6468	110	3645	69
Non-ESJ Community	3240	112	2658	67

1. Tribal Outreach

One of the ESJ communities that can face barriers to timely energization is Tribal Nations. The Bureau of Indian Affairs has the role of carrying out trust responsibility with the Tribal Nations that SDG&E serves which introduces additional layers of review and approval and complexity to jobs on reservations. For example, projects can face land and permitting challenges that are unique to reservation land. Many Tribal Nations we are privileged to serve require cultural monitors and safety

[8] Table 1 includes energized jobs only, and excludes outliers as defined in Section E "Outlier Data."

escorts when SDG&E employees and contractors are on tribal lands, and many tribes require 5–10-day advance notice for accessing their land, which can impact construction timelines. SDG&E values its relationship with tribal partners and strives to ensure that excavation activities respect cultural resources, which can sometimes lead to further delays and even work stoppages.

As part of the Single Point of Contact (SPOC) requirement, a dedicated Project Manager and Project Planner has been assigned to each tribe that SDG&E serves. These designated contacts provide consistent guidance and support throughout the entire project lifecycle from initiation through energization. To further streamline coordination, all tribal projects are now managed within a single project planning team.

Another advancement includes the development of a more efficient process for coordinating site access. By establishing clearer communication pathways and streamlined procedures with tribal partners, SDG&E can now field jobs more quickly and schedule crews sooner.

Finally, SDG&E has implemented monthly meetings with tribal representatives to review processes, discuss project updates, and maintain open communication. These efforts have strengthened partnerships, improved transparency, and created more efficient and responsive workflows.

To help reduce barriers to timely energization and support the unique nature of SDG&E's relations with the tribal groups within its region, SDG&E has taken a holistic approach by assigning a set of subject matter experts to manage each tribal relationship. As a result of these efforts, SDG&E has gained valuable insights into effectively supporting customers residing within tribal reservations.

Relationship continuity and information sharing between cross functional teams within SDG&E like the planning, land services, right-of-way, customer success and tribal relations teams has allowed SDG&E to engage the entire tribal project portfolio, inclusive of commercial and residential energization projects, and assign these energy-related activities to specific and knowledgeable SDG&E resources. Regular communication during monthly meetings has provided tribes with better visibility and understanding of SDG&E's processes.

2. Customer Outreach

Through customer listening sessions, SDG&E identified a consistent theme: customers seek a single, reliable source of information to understand, manage, and navigate their energization projects from initiation through completion. In response, SDG&E has reassessed the role of the Customer Energization Portal and is evolving it into a more robust, intuitive, and self-service oriented platform that supports customers throughout the project lifecycle.

As previously described, SDG&E implemented enhancements to the Customer Energization Portal landing page to address early customer confusion around how to initiate requests and what information is required. The redesigned landing page now presents the eight statewide steps to energization, clearly delineates SDG&E and customer responsibilities, and provides timeline expectations aligned with the Energization Decision. Additional educational content, guided prompts, and self-help tools, including the SDG&E virtual assistant, were added to help customers independently submit more complete requests, identify points of contact, and check project status.

Building on this foundation, SDG&E is advancing several key enhancements intended to further establish the portal as a centralized, self-service platform and singular reference point for all

project-related information and communications. Most notably, SDG&E is developing two-way messaging functionality, targeted for rollout by the end of the year, which will allow all communications between customers and SDG&E representatives to flow directly through the portal. This enhancement will improve transparency, reduce fragmented communications, and provide a shared, auditable record for all parties involved.

Additional portal enhancements under evaluation or development include improving document management capabilities to allow customers to upload larger file sizes required by planning teams to accurately evaluate customer projects, as well as enhancements to the milestone tracker. Planned milestone improvements are intended to provide more granular updates on upcoming project steps and clearly indicate SDG&E versus customer responsibilities at each stage of the process.

Outside of the portal, SDG&E is also focused on improving the overall customer experience by analyzing the most common reasons customer requests for service are returned or paused by internal business units as they move through the pipeline - an area customers identified as particularly frustrating. Insights from this analysis are being used to inform process improvements, reduce rework, and increase clarity earlier in the customer's project lifecycle.

In parallel, SDG&E has implemented targeted improvements to its current customer phone systems. These updates were implemented while SDG&E advances a broader modernization of its telephony platform. SDG&E is transitioning to Amazon Connect, a cloud-based contact center solution that will further enhance the customer experience through:

- Intelligent, self-service routing
- Real-time insights and reporting
- Flexible, cloud-based solutions

From an internal perspective, SDG&E continues to strengthen continuity and coordination across teams supporting customer projects through standardized documentation, QA/QC checklists, and clearer handoff practices. SDG&E has also shifted roles and responsibilities around customer communication to enable a single point of contact for jobs that are greater than 30 days. These efforts, supported by the Customer Connections Team and increased reliance on the Customer Energization Portal, are designed to reduce rework, improve accountability, and provide customers with a more consistent and transparent experience across the energization process.

F. Outlier Data

SDG&E's complete data set is inclusive of all outliers. However, outliers are not included in the aggregate calculation, as they would have skewed representation of the 8 Energization Steps. Some of the outlier data stems from manual data entry errors. SDG&E is working diligently to minimize data entry errors and will require system enhancements to further these efforts in order to provide the highest level of quality data. When an outlier is identified within the data for a specific project, only the impacted data from that project is excluded from any aggregate calculations that rely on the affected field. However, the data fields for that project which are not impacted by the outlier remain included in the overall calculations. Accordingly, the following outlier data has been removed from the Aggregate tab of the report when applicable:

1. Jobs with data entry date errors such as “1/1/9999” or “1/1/2001” or “1/1/2032”. These dates are explicitly inaccurate.
2. Jobs with negative timelines. For example, if the end date is before the start date, the data is not accurate.
3. Jobs with a date in Steps 1-7 that is later than the Energization date in Step 8.
4. Projects with incomplete status verification: marked as “complete” but missing construction or energization dates, preventing confirmation of closure.
5. Projects with durations exceeding two standard deviations above the energized job population average and by tariff type.

G. Staffing Analysis

SDG&E has completed a comprehensive staffing analysis consistent with the requirements of California Public Utilities Code Section 935(a). This analysis, which supports SDG&E’s implementation of the energization Decision, was filed in December 2025 and is provided as an attachment to this report. In addition to the attached analysis, SDG&E will also include an updated staffing analysis in its forthcoming General Rate Case filing later this year, as required under Public Utilities Code Section 935(a).

V. REPORTING GAPS

SDG&E strives to provide the Commission with the highest quality data that accurately reflects timelines during the reporting period. SDG&E does not currently have systems that accurately track all the data required by the Decision. Currently, certain data fields in the workbook are unavailable, limited, and/or unreliable and will continue to be unavailable until necessary IT enhancements are implemented. SDG&E has identified the necessary IT systems that must be upgraded or implemented to address the data gaps and the data accuracy. As these IT system improvements were not anticipated at the time of SDG&E’s 2024 GRC application, the associated costs constitute an incremental requirement; i.e., SDG&E does not have existing funding authority to make the system enhancements necessary to provide this data. Nor was this incremental funding requirement approved as part of SDG&E’s SB410 funding application.[9] Until sufficient funds are authorized, SDG&E will continue to leverage and optimize existing systems and resources as much as possible to deliver the most complete dataset it can within available resources.

SDG&E anticipates data availability and accuracy to increase, but there are several steps needed for that to occur and be visible in reporting. After system enhancements are implemented, data collection via the new systems will begin. It will take time to phase out in-flight projects, collect data in the new systems, visualize that data, and see the full benefits over the lifecycle of a customer’s project. There is an inherent delay between data collection and reporting. This is because reporting periods are six months and the reporting periods end three months prior to when the data for the reporting period becomes available. Three months are needed for data processing and report development.

SDG&E has proposed IT Enhancements designed to support the compliance requirements adopted by D.24-09-020. These enhancements are critical to enabling system-wide improvements to

[9] *See* Decision 25-10-034: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M586/K499/586499719.PDF

the energization process and are directly attributable to SDG&E's obligation to implement Commission-directed changes that improve transparency, reduce timelines, and enhance tracking capabilities.

The estimated implementation timelines included in the following tables below for IT Enhancements are based on the best available information at this time. SDG&E will continue to evaluate its business needs and compliance obligations to optimize efficiency while maintaining a focus on affordability. These timelines are subject to change as new information becomes available, Commission directives change, or priorities evolve. SDG&E remains committed to fulfilling the requirements of D.24-09-020 and will continue to assess and prioritize system improvements as funding allows.

Data collection will commence once IT system enhancements have been completed. Given that data is pulled three months prior to each reporting cycle, and reports are submitted on a biannual basis, the initial appearance of new, relevant data in the Energization Report is expected to occur within three to nine months post-implementation of relevant IT system enhancements. The precise timing will be dependent on the alignment of the reporting cycle with the date of the IT system enhancement deployment. For data points collected later in the project life cycle, a longer duration will be required before the data will appear in reports. For example, in order to accurately report on projects that exceed the maximum energization targets, SDG&E must first be able to accurately track IOU dependent timelines without customer-related dependencies. Once this tracking capability is established, a project must then proceed through its full lifecycle, with the IT system enhancement in place, and exceed the maximum energization target before there is any reliable data to report. As an example, a Rule 15 project would need to exceed 357 calendar days (245 business days) plus time for any customer dependencies to be considered beyond the maximum energization target. Therefore, reliable data on these scenarios may not be available until more than a year after the IT system enhancement is implemented.

Table 2 – Estimated IT System Enhancement Implementation[10]

Data Point	Data Sheet	Est. Completion Date
Estimated timing for when customer anticipates additional capacity necessary as indicated on customer's application (Date)	Tariff Data	11/30/2026
Total additional kW capacity for the necessary future upgrade as listed on customer's application (kW)	Tariff Data	10/30/2026
Date of IOU rejection of application (Date)	Tariff Data	10/30/2026
IOU reason for rejection of application (Reason)	Tariff Data	11/30/2026
Project triggered for upstream capacity project (Yes/No)	Tariff Data	03/28/2027

[10] Some data points are currently reported manually or through legacy systems.

Data Point	Data Sheet	Est. Completion Date
Date IOU completes the upstream capacity project (Date)	Tariff Data	03/28/2027
Time to complete upstream capacity project (Calendar Days)	Tariff Data	Complete
Identify when in the energization process the customer requested a change in design or scope (Date)	Tariff Data	Complete
Customer cancelled/delayed project (as needed) (Yes or No)	Tariff Data	Complete
Step 3 - Data Point Start 3) Customer Dependencies Start (Date)	Tariff Data	03/28/2027
Step 3 - Data Point End 4) Customer Dependencies End (Date)	Tariff Data	03/28/2027
Step 4 - Data Point Start 4) Utility Dependencies' Start (Date)	Tariff Data	03/28/2027
Step 4 - Data Point End 5) Utility Dependencies End (Date)	Tariff Data	03/28/2027
Location of project exceeding the maximum energization target: Location (circuit level)	Tariff Data	TBD[11]
R15/R16/R29/R45 Energization Average meeting/exceeding Average Energization Target (Meeting/Exceeding)	Tariff Data	TBD
R15/R16/R29/R45 Energization Maximum meeting/exceeding Maximum Energization Target (Meeting/Exceeding)	Tariff Data	TBD
R15/R16/R29/R45 Energization Reasoning as to why exceeded average/maximum Energization Target (Reasoning)	Tariff Data	TBD

[11] To Be Determined (TBD) denotes that the completion date for the IT system enhancement has not yet been established. The timeline remains undetermined pending the availability of funding necessary to advance this work.

Data Point	Data Sheet	Est. Completion Date
Amount of load (kW) provided to applicant using flexible service options[12] (kW)	Tariff Data	N/A
At the time energization provided, remaining (or total) unserved load requested by the applicant (kW)	Tariff Data	N/A
Estimate when full service will be provided to the applicant for customers using flexible service and/or receiving tiered load schedules (Date)	Tariff Data	N/A
Size of Installed Main Panel Upgrade (Amps)	MPU Data	11/30/2026
Reason why upgrade was cancelled and/or rescheduled (Reason)	MPU Data	TBD
Main Panel Upgrade - Rescheduled Date (as needed) (Date)	MPU Data	11/30/2026
Additional Time from Initial Scheduled Date to Rescheduled Date (Calendar Days)	MPU Data	TBD
Additional Time from Initial Scheduled Date to Rescheduled Date (Business Days)	MPU Data	TBD

The Average Energization (Meeting/Exceeding Target), Maximum Energization (Meeting/Exceeding Target), and Reasoning for Exceedances data points are dynamic and dependent on the availability of multiple underlying data elements necessary to calculate complete energization timelines. Because CPUC energization timeline requirements apply specifically to IOU activities, SDG&E must be able to segregate the IOU portion of the timeline from the overall project duration. At this time, the underlying disaggregated data required to perform this separation is not available. Without the ability to distinctly allocate time spent by the customer versus time spent by the IOU, SDG&E cannot determine whether the IOU-specific portion of work meets or exceeds the applicable energization targets. Because these aggregated metrics rely on the accurate disaggregation of underlying data, the absence of this foundational data prevents SDG&E from generating valid average values, maximum values, or reasoning associated with apparent exceedances of the IOU energization targets. Until the necessary underlying data elements are available and consistently captured, SDG&E is unable to produce the energization timeline metrics in a manner that meets CPUC reporting requirements.

[12] Per Decision 26-02-025, *Decision Establishing a Standard Offer for Flexible Service Connections*, SDG&E was not directed to implement or offer a standard-offer Flexible Service Connection. Accordingly, the associated reporting data points have not been prioritized for development at this time.

A. Data Availability

Due to the unavailability or unknown status of certain data at the time of the report, SDG&E utilizes the terms "Not Available," "N/A," and "Unknown" in the report to clarify the status of data. "Not Available" is used for any data field that is not available for this filing due to system limitations. "N/A" signifies that the data field is not applicable to the specific job due to its status or work type. "Unknown" is used where it is uncertain if a date or cost will be available, primarily resulting from pending or incomplete data in SDG&E systems.

1. Overall Data Accuracy

SDG&E has prepared this report utilizing the full capabilities of its current systems, supplemented by manual data validation where feasible. Despite these efforts, several data points may be unreliable due to inherent system constraints and limitations in data availability. In specific areas of the report, such as MPU-specific end-to-end data, costing components, and the eight step timelines, there are large amounts of unknown and unavailable data. Consequently, the accuracy of these sections is limited. Further, while some data does not appear to be missing, such as in the eight steps and concurrent steps, SDG&E emphasizes that the accuracy of this data is constrained by system limitations. For example, SDG&E's system does not currently track overlapping durations. Additionally, the following customer-provided data cannot be verified for accuracy and may further impact the accuracy and reliability of the data.

- Customer Desired Energization Date
- Difference from Customer Desired Energization Date and Final Energization Date (Calendar Days)
- Difference from Customer Desired Energization Date and Final Energization Date (Business Days)
- Estimated timing for when customer anticipates additional utility capacity needs to be available as indicated on customer's application (Date)
- Size of Installed Main Panel Upgrade (Amps)

2. Costs

There are several cost reporting columns in SDG&E's template with fields marked as unknown. This is because even at the time of energization, many actual or estimated costs have yet to occur or to be calculated; therefore, they remain unknown. After a job is energized, SDG&E may continue to receive contractor invoices or "trailing costs" after the energized date for reporting. As a result, the full costing process, or financial reconciliation process, can take over 6 months from the time of Energization and the data is not yet known for reporting. For this reason, there is a significant amount of unknown data under the costing components section of the report. SDG&E provides the "actual costs at the time of energization" where known/available, but it is not a final static cost, as trailing invoices can be received up to six months later. In addition, depending on the type of work and the associated billing code, no cost report is generated to calculate estimated values. For these reasons, this data may be unavailable/unknown at the time of the report.

SDG&E systems can pull and report on all available cost data as required in the template. However, through ongoing discussions and clarifications from the CPUC, if additional cost data

granularity is required, system enhancements would likely be required. At this time, SDG&E's system limitations do not allow for reliable retrieval of granular data related to costs. To provide an example, when SDG&E's cost system is queried, materials are encompassed in a single line item called "materials." Similarly, a single line item called "staffing and labor" represents a loaded cost, inclusive of both hourly and salary wages as well as benefits. If further cost granularity is required than what is provided in the report, enhancements will be necessary.

3. Eight Steps

As discussed throughout this narrative, there are numerous complexities with mapping SDG&E's existing phases and project milestones to the eight steps and particular challenges with tracking and reporting concurrent steps. For this reason, much of the data provided on the various steps is limited in availability and/or accuracy. Additionally, some system data entries may be missing, resulting in erroneous dates and duration calculations in reporting. These missing or erroneous data points affect the reporting of the data point start and end dates, concurrent steps, associated summations, and the narrative on exceeding timelines. Further enhancements are required for noticeable improvement to these sections and to avoid excessively burdensome and manual data processing.

In addition to challenges with accurate tracking and reporting, the challenges associated with aligning stage gate data to eight statewide steps make it difficult to communicate the customer's status to the customer. For example, system enhancements are needed to align the Customer "ball in court data" with the eight steps. Historically, SDG&E customers were able to view their stage gate status and actions needed, and SDG&E is actively working to continue to provide this level of transparency with the eight statewide steps.

4. Delays

Per recent collaboration and direction received from the Commission's Energy Division staff, SDG&E will begin utilizing the following definitions for "IOU Delayed Project" and "Customer Related Delays":

An IOU Delayed Project is defined as any project where the total IOU-controlled time across the full project lifecycle exceeds the maximum energization targets established in the Decision. This definition emphasizes a holistic, end-to-end view of project timing rather than focusing on delays at individual process steps. Projects are not considered delayed due to routine or minor schedule adjustments, such as rescheduling inspections or minor internal shifts. Delays within specific steps do not qualify a project as "delayed" unless they contribute to exceeding the total IOU "maximum" time threshold. The Decision's framework is based on overall project timing, allowing for delays in one step to be offset by acceleration in another. Only time periods under IOU control are considered when determining delay status, ensuring accountability is appropriately assigned. Due to current system constraints, SDG&E lacks the capability to systematically track IOU-controlled time throughout the full project lifecycle and effectively report on delays. Without system enhancements that support granular tracking to separate IOU and Customer dependencies, SDG&E is unable to distinguish and exclude where minor schedule changes have occurred.

A Customer Related Delay occurs when an energization project cannot proceed due to a customer-related dependency. This includes situations where there is no concurrent utility activity. Customer-driven delays may occur under various circumstances, including requests for design

changes following the completion of Step 2, rescheduling of inspections, or failure to respond to IOU communications. In certain instances where customer delays materially affect project progression, the IOU-clock may be reset to reflect a revised AFS/starting point, consistent with the Decision's treatment of energization timeline tracking. To improve its ability to consistently identify and document these circumstances, SDG&E has improved their process for tracking when a customer action (or inaction) prevents a project from advancing. This process helps provide a standardized mechanism for categorizing and monitoring customer-initiated delays across projects.

SDG&E currently faces system limitations that constrain its ability to comprehensively track and differentiate IOU-attributable and customer-driven delays across the project lifecycle. System enhancement opportunities have been identified to begin addressing these deficiencies and enable more accurate and automated tracking of delay sources. Once funding is authorized and mitigation for existing system limitations implemented, the enhancements will allow SDG&E to more precisely isolate customer-related time and ensure that IOU performance metrics reflect only IOU -controlled activities.

Prior to 2024, SDG&E was not required to track or report on "delays," especially delays that are the result of the customer. Therefore, for the current report, information related to delays is based on assumptions tied to SDG&E's existing phases that can align with customer delays. For example, if there are multiple completed application dates and multiple design dates, the assumption is that the customer changed the scope of its project, including their design, but that is not guaranteed without manually looking into the specifics of the customer's request. These types of changes could "delay" progress on a customer request. Since reporting on delays has a heavy reliance on customer dependencies, which SDG&E currently does not have a way to track, the associated data is likely misrepresented.

VI. CONCLUSION: DATA & REPORTING INSIGHTS

The aggregate completed application to energization timeline data provided in the aggregate summary represents the most accurate reflection of current performance available under existing system capabilities. Although customer-related time is not yet separately tracked, the aggregate data and average energization timelines per tariff remain a meaningful benchmark for evaluating overall performance.

The current energization reporting framework includes all cumulative project data beginning January 31, 2023. While this approach provides a broad dataset, it does not fully reflect the operational and process improvements SDG&E has implemented following the issuance of D.24-09-020. Because the current reporting requirement structure continues to incorporate long duration projects initiated prior to the Decision, overall averages can appear to increase as these older jobs reach completion. This observed trend is therefore driven by the rolling inclusion of legacy projects rather than diminished performance.

To more accurately evaluate and demonstrate the progress made since the Decision, SDG&E developed supplemental metrics that compare pre-Decision and post-Decision project energization timelines. This comparison more clearly illustrates the impact of SDG&E's process improvements. Early results show meaningful reductions in end-to-end project timelines for projects initiated under the new framework of the Decision, providing measurable evidence of increased efficiency within SDG&E's energization processes. Despite these improvements, SDG&E's current systems do not yet support the discrete separation of customer-driven time from IOU-controlled time. As a result,

performance metrics used for the March 2026 reporting cycle rely on full end-to-end durations from completed application to energization which inherently include customer related activities. While this limits the precision with which IOU performance can be isolated, the data still indicates a positive overall trend across the broader job population.

Additionally, Rule 16 projects due to their high volume and relatively short duration continue to have a weighting effect on aggregate averages. To help demonstrate this, SDG&E includes the following breakdown of timelines by each tariff type within this reporting period.

Table 3 – Average Energization Timelines Per Tariff

	Rule 15	Rule 15/16	Rule 15/45	Rule 16	Rule 45	
Average Applicant Final Submittal ("AFS") to Energized (Business Days)	240	275	348	100	370	
Count of Completed Energization Requests	495	109	14	9062	28	9708 (total)

To further illustrate improvements in energization performance, SDG&E has developed a comparison of pre-Decision and post-Decision job timelines. This comparison provides a clearer view of trend improvements that are otherwise obscured in the cumulative reporting structure.

Table 4 – Comparison of Pre-Decision and Post-Decision End-to-End Timelines (Business Days)

	Average Cumulative Timeline[13]	Average Timeline (Pre-Decision	Average Timeline (Post-Decision)	Timeline Reduction (Pre-Decision vs. Post-Decision)
Rule 15	239	261	147	114
Rule 15/16	275	300	176	124
Rule 15/45	349	349	N/A	N/A
Rule 16	101	119	76	43
Rule 45	370	370	N/A	N/A
MPU	81	112	52	60

[13] Cumulative timelines represent jobs with a completed application beginning January 31, 2023.

These metrics provide clearer evidence of efficiency improvements that are not visible in the cumulative reporting format. Across multiple tariff types, post-Decision timelines reflect reductions relative to pre-Decision performance. Overall, while system limitations continue to constrain the granularity of reporting particularly in distinguishing IOU and customer time, the data demonstrates that SDG&E is achieving meaningful improvements in energization timelines and progressing toward the statewide targets established in D.24-09-020. Continued modernization of legacy systems will further enhance data accuracy, improve transparency, and support sustained improvement in customer experience and energization timelines.

SDG&E remains committed to supporting California's decarbonization goals by enabling timely customer energization requests and distribution system upgrades and on improving the overall customer journey, with greater communication and transparency. SDG&E will continue its efforts to address implementation opportunities and system limitations in furtherance of the Decision and its customers.

Staffing Analysis Attachment

San Diego Gas and Electric Company's 2025 Analysis of Current and Future Qualified Staffing Levels Pursuant to Public Utilities Code Section 935

A. Executive Summary

Pursuant to Public Utilities Code Section 935, San Diego Gas and Electric Company (SDG&E) submits this staffing analysis to provide a comprehensive evaluation of the company's workforce strategy, current staffing structure, and projected staffing resource needs. This analysis is intended to inform stakeholders of SDG&E's approach to aligning workforce capabilities with operational demands while maintaining compliance with applicable tariff rules and service obligations. The analysis provides a focused assessment of the staffing required to plan, design, engineer, and construct customer-driven electric distribution energization work requests, including but not limited to, those projects with jobs across Electric Rules 2,13,15, 16, 45, 46 and other requests such as Main Panel Upgrades (MPUs), coordination with Rule 21 projects and customer requested outages; or any combination to meet a customer's project needs.

As of December 2025, SDG&E employs 4,681 full-time employees. Within the Electrification Distribution Workforce[1] that supports customer energization requests and the 8-steps of energization as adopted in D.24-09-020,[2, 3] SDG&E currently has 490 full-time equivalent (FTE) employees and 1,372 contractors exclusive of any current vacancies. It should be noted that SDG&E does not have dedicated resources for energization requests so, to varying degrees, the functions and departments included in this analysis also support non-customer requested energization requests. As SDG&E currently does not track the breakout, this workforce staffing analysis includes the full staffing count of the primary functional areas that support energization.

Projected staffing requirements balance anticipated growth in customer-driven energization requests with SDG&E's ongoing efforts to streamline and automate its manual and disaggregated processes and systems.[4] These initiatives aim to reduce duplicate and manual tasks and leverage technology through continued IT and automation investments. To meet these demands, SDG&E has a deliberate workforce strategy focused on operational efficiencies, process improvements, and technology enablement. This approach is designed to absorb incremental workload through automation and technology solutions, minimizing headcount growth except when critical to

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1 Electrification Distribution Workforce is defined by the staffing required to energize residential, commercial, and government customers for tariff work pursuant electric Rules 2,13,15, 16, 45, 46 and other requests such as MPUs, coordination with Rule 21 projects and customer requested outages; or any combination of such therein to meet a customer's project needs.

2 *Decision Establishing Target Energization Time Periods and Procedure for Customers to Report Energization Delays,* at Section 7.

3 The Electrification Distribution Workforce also supports non-customer requested work.

4 A project lifecycle can span up to sixteen different business units across twenty disparate systems. In 2025 SDG&E began connecting these systems for visibility and transparency and is further pursuing efforts to streamline its energization work to reduce energization timelines and provide a simplified and transparent customer experience.

meeting energization timelines. By doing so, resources can be reduced or shifted to more specialized roles, driving efficiency and proficiency in roles supporting customer energization projects. A cornerstone of SDG&E's workforce strategy is maintaining a robust apprenticeship pipeline for technical field roles. These positions require extended time to achieve certification and proficiency in lineman-related trades. SDG&E also has an in-depth engineering rotational program, but it is not classified as an apprenticeship. Recruiting, training, and retaining these specialized skill sets are essential to sustaining SDG&E's ability to continue delivering safe, reliable, and timely service to customers. This staffing analysis reflects SDG&E's commitment to proactive workforce planning to continue meeting customer expectations and energization timelines.

The remainder of this report is divided into the following four Sections:

1. Section B – Framework for Staffing Analysis: Provides a background and overview of Senate Bill 410 (Powering Up Californians Act) and required staffing analysis per Public Utilities Code Section 935.

2. Section C – Current Qualified Staffing Levels of the Electric Distribution Workforce: Current Electrification Distribution workforce headcounts supporting customer energization requests.

3. Section D – Apprenticeship: Highlights of SDG&E's apprenticeship pipelines, frequency, timelines, and overall throughput volume of the workforce who require apprenticeship training.

4. Section E – Forecast Staffing Analysis & Conclusion: Forecasted staffing needs for SDG&E. These forecasts take process improvements and technology solutioning into consideration as part of the SDG&E staffing strategy.

B. Framework for Staffing Analysis

1. Regulatory Background

In 2023, the California Legislature enacted the Powering Up Californians Act through Senate Bill 410, establishing state policy that upgrades to electrical corporations' distribution systems are essential for meeting decarbonization goals, fulfilling utility obligations to serve, and ensuring that housing, businesses, and electric vehicles can be energized without delay. This Senate Bill was prompted by rising concern over utilities' ability to energize customer requests promptly, leading the Legislature to require that electrical corporations recruit, train, and retain a sufficiently large, qualified workforce to carry out distribution system upgrades and customer energizations while continuing vital safety and reliability activities such as wildfire mitigation, inspections, and maintenance. Importantly, the Legislature directed the California Public Utilities Commission (Commission) to mandate that utilities maintain adequate staffing and an apprentice pipeline to support these objectives. Consequently, Section 935 of the Public Utilities Code, requires utilities, as part of each general rate case and annual report, to provide an analysis of current and projected staffing levels for all roles needed to plan, engineer, and construct distribution system upgrades necessary for timely customer energization, without compromising critical ongoing safety and reliability work.

2. Approach to this Staffing Analysis

To meet the staffing analysis requirements of Public Utilities Code 935, SDG&E first identified every department that contributes to customer-driven energization projects across the full lifecycle—from initial customer request through planning, design, engineering, permitting, land, environmental, customer required work, inspection, and construction. Current staffing data was then collected for each functional area and reported here in Section C.

C. Current Qualified Staffing Levels of the Electrification Distribution Workforce

The Electrification Distribution Workforce is defined by the staffing required to energize residential, commercial, and government customers for tariff work pursuant electric Rules 2,13,15, 16, 45, 46 and other requests such as MPUs, coordination with Rule 21 projects and customer requested outages; or any combination of such therein to meet a customer's project needs. This includes, for example, combination jobs where more than one tariff rule applies such as Rule 15/16 and Rule 15/45. The staffing required for this workforce begins with our application intake team and concludes with the construction crews required for energization. Across the 8-step energization process, adopted in D.24-09-020, the Electrification Distribution Workforce at SDG&E is comprised primarily of the following project functions:

- Planning & Project Management
- Permitting, Land, & Environmental Services
- Design
- Electrical Distribution Planning
- Electrical Distribution Standards
- Construction Management & Field Crews
- Billing

Planning & Project Management: Responsible for the customer's application for energization, planning, and project management of customer requested projects including MPUs, and Rules 2,13,15, 16, 45, and 46 projects, as well as coordination on Rule 21 and customer requested outages. Provides project accountability for customers, including a single point of contact (SPOC) pursuant to the Energization OIR Decision. Responsible for providing seamless customer service throughout the project lifecycle and coordination where multiple tariffs or other customer requests are involved. Fields and writes service orders, performs all project planning activities, prepares customer contracts, supports customer billing and interfaces with Authorities Having Jurisdiction, to ensure customer inspections have been completed prior to energization.

Permitting, Land & Environmental Services: These departments are responsible for securing all required permits at the local, state, federal or agency level necessary for SDG&E to energize customer facilities or to perform other customer-requested work or company work. Additionally, they obtain essential land rights, including easements, and ensure compliance with all environmental requirements.

Design: Prepares distribution designs for electric distribution work orders. For energization requests this would primarily include designs for Rule 2, 13, 15,16, 45 and 46. This scope includes all necessary Field Change Orders (FCO's) as well as quality assurance and quality control (QA/QC) reviews.

Electrical Distribution Planning: Responsible for performing engineering analyses of customer load energization requests to identify upstream capacity needs, plan necessary upgrades, and manage the capacity upgrade projects to ensure timely energization. In addition, the team develops circuit- and substation-level electric load forecasts and plans distribution system upgrades as part of the annual Distribution Planning Process (DPP). This ensures not only that customer load requests can be accommodated, but also that the distribution system is prepared to meet future forecast needs.

Beyond electrification, the team supports a range of additional responsibilities, including generation interconnection studies, technology innovation, and providing technical expertise for regulatory proceedings.

Electric Distribution Standards: Responsible for maintaining and updating service standards, material standards, work methods and construction standards, and other technical support to safely and reliably energize customers. This group would also approve any customer requested deviations from these standards.

Construction Management & Field Crews: Executes pre-construction and construction activities for all tariff work. These teams work in-concert with local county and municipal inspection teams, SDG&E inspection teams, and ensure all required project prerequisites and safety verifications are completed and in compliance with SDG&E standards prior to scheduling construction crews. Assigns and manages contracted civil and electrical construction crews appropriate to project scope, creates switch plans and schedules any required outages to perform work, and coordinates with customer contractors.

Billing: Ensures required fees are accurately reviewed and paid throughout the lifecycle of a project. Ensures that the appropriate meter rate is set for the customer for long-term service. This includes setting tariff incentivized rates such as the EV-HP rate. This department also supports all of SDG&E for billing.

A detailed breakdown by project functional area is as follows:[5, 6]

Project Functional Area	2023	2024	2025
Planning & Project Management	404	414	394
Design	598	600	602
Construction Management & Field Crews	656	654	656
Electric Distribution Planning	46	46	42
Electric Distribution Standards	40	48	47
Billing	45	40	29
Land & Environmental Services	107	100	74
Permitting	18	18	18
TOTAL	**1,914**	**1,920**	**1,862**

D. Apprenticeship

SDG&E maintains structured apprenticeship and trainee programs for linemen to ensure a sustainable pipeline of qualified personnel for critical field and engineering support roles. Program elements typically include classroom instruction, on-the-job training (OJT), progressive skill assessments, and certification milestones aligned with safety and industry standards. SDG&E does not have apprenticeship pipelines for engineers. However, selected engineers do participate in a rotational program throughout the company.

E. Forecast Staffing Analysis & Conclusion

For the remainder of SDG&E's current General Rate Case (GRC) cycle (2026-2027), SDG&E does not currently forecast any workforce growth outside of filling any vacancies that currently exist. In preparation for growth in energization requests that will likely occur during this period or beyond, SDG&E's strategy is to prioritize technology investments and process improvements to reduce the need for additional workforce resources and will continue to look for opportunities to create efficiencies in workflow platforms and customer portals that further enable automation, customer communication and scheduling, and AI enhancements. The automation and creation of efficiencies of manual processes will create opportunities to shift resources to more complex and skilled tasks as energization requests increase.

SDG&E requested funding through its SB 410 Ratemaking Mechanism Application (A.25-04-015) to address the critical IT enhancements needed to meet the compliance requirements specified in D.24-09-020. Although the Commission's final decision on the application did not authorize SDG&E to utilize the mechanism to immediately recover the costs of these needed IT enhancements, SDG&E believes IT investments deliver value to all ratepayers by reducing cost of

[5] Includes SDG&E FTE and contracted workforce.

[6] SDG&E is currently unable to provide the staffing levels of the Electrification Distribution Workforce to reflect the individual employee job classification figures given that job titles and departments have changed over the course of the past few years. In addition, a companywide change to the classification of all jobs is set to take effect January 1, 2026. However, SDG&E will endeavor to track staffing levels at this level of granularity and expects to be able to include them in future reports.

service to our customer base without growing the workforce, while also enabling faster energization timelines and more transparent communications with customers as intended by the D.24-09-020.[7] Specifically, SDG&E is overhauling our customer portal to meet requirements outlined in AL 4547-E and AL 4547-A-E and to improve customer communication with designated project single points of contact with AI and automation enhancements. In addition, SDG&E is expanding our internal process workflow platform (NEXUS) that interfaces and aligns SDG&E stakeholders across the 8-steps of energization to reduce timelines while ensuring unity of effort for every project type.

SDG&E is committed to having sufficient and adequately skilled resources to energize customers in a timely manner that meets their needs and in compliance with Public Utilities Code Section 935 without impairing ongoing safety and reliability activities such as wildfire mitigation, inspections, and maintenance. Multi-year hiring strategies will be reviewed and adjusted to reflect efficiencies, regulatory directives, and observed performance.

[7] SDG&E will seek recovery of these necessary IT enhancement costs in a future standalone application and/or in its next GRC filing.

ATTACHMENT B

SDG&E BIANNUAL ENERGIZATION DATA SPREADSHEET

Due to its size, this attachment is only being provided electronically as an Excel spreadsheet. The attachment is available at the following location:
https://www.sdge.com/rates-and-regulations/proceedings/Order-Instituting-Rulemaking-to-Establish-Energization-Timelines