



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

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Joint Application of Pacific Gas and Electric Company (U 39-E), Southern California Edison Company (U 338-E) and San Diego Gas & Electric Company (U 902-E) Requesting Commission Approval of Proposals for a BCR Calculation Methodology, Audit Methodology, and Cost Recovery Conditions as Specified in Resolution SPD-37.

A.26-02-005
(Filed February 9, 2026)

**RESPONSES OF SAN DIEGO GAS & ELECTRIC COMPANY (U902-E) TO
PRESIDENT REYNOLDS'S QUESTIONS AT THE PREHEARING CONFERENCE**

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April 10, 2026

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I. INTRODUCTION

During the March 27, 2026 prehearing conference in this matter, Commission President John Reynolds asked Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) to respond to three questions relating to the filing of a 10-year Electrical Undergrounding Plan (EUP) pursuant to Senate Bill (SB) 884 by April 10, 2026.¹ Pursuant to President Reynolds' request, SDG&E provides its responses to those questions below. SDG&E notes that the questions below are taken from the prehearing conference transcript.

II. SDG&E'S RESPONSES TO QUESTIONS

Question 01

Why have you not yet filed Electrical Undergrounding Plans with the Office of Energy Infrastructure Safety?

¹ A.26-02-005, Prehearing Conference Transcript, 7:21 – 8:12 (Mar. 27, 2026).

Answer to Question 01

SDG&E is currently preparing its Test Year 2028 GRC. In the context of doing so, SDG&E is assessing the role of an EUP, including when such a plan will be filed, subject to the requirements under consideration in this application. Final EUP guidelines have been delayed or have undergone significant changes over the past three years, and regulatory inconsistencies have resulted in uncertainty. For instance, Energy Safety instructed PG&E, SCE, and SDG&E in November 2022 to not submit an EUP until Commission guidelines were finalized. In addition, SDG&E believes the issues in this Phase 1 application may impact calculations required in the EUP. As such, SDG&E is assessing the impact of this Phase 1 application with regards to a decision regarding the timing of an ultimate EUP filing.

Question 02

When do you expect to file your plan with Energy Safety?

Answer to Question 02

Consistent with the discussion in response to Question 001, SDG&E has not committed to a specific EUP filing date. SDG&E currently anticipates submitting an EUP before the end of 2026, subject to ongoing developments that may arise during the Phase 1 application and any requirements arising in any Commission decisions issued during the Phase 1 proceeding that may impact SDG&E's determination regarding whether to submit an EUP.

Question 03

How does your expected timeline align with the expectation when SPD-37 was adopted if PG&E's decisions, beyond those tied to 2027, should be made in the Senate Bill 884 venue and not in the general rate case?

Answer to Question 03

As stated in response to question 1, SDG&E is preparing its 2028 GRC and assessing the role of an EUP in coordination with SDG&E's 2028 GRC submission, including when such an EUP plan will be filed, subject to the requirements under consideration in this application. As noted, SDG&E believes the issues in this Phase 1 application may impact calculations required in the EUP.

Respectfully submitted,

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