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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Joint Application of Pacific Gas and Electric Company (U 39-E), Southern California Edison (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.	Application No. 26-02-005 (Filed February 9, 2026)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO QUESTIONS RAISED BY PRESIDENT REYNOLDS DURING THE PREHEARING CONFERENCE

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Dated: **April 10, 2026**

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Pursuant to the instructions from President Reynolds and Administrative Law Judge DeAngelis at the prehearing conference held on March 27, 2026 ("Prehearing Conference"), Southern California Edison Company ("SCE") respectfully submits this response to the questions raised by President Reynolds during the Prehearing Conference.

I.

BACKGROUND

Senate Bill ("SB") 884 required the California Public Utilities Commission ("Commission") to establish an expedited undergrounding program for large electrical corporations.[1] To participate in the program, a large electrical corporation is required to submit, among other things, a 10-year plan for undergrounding distribution infrastructure.[2] Large electrical corporations are not required by statute to submit a 10-year electric undergrounding plan under SB 884. However, in Resolution SPD-37, the Commission required Pacific Gas and

[1] Public Utilities Code § 8388.5.
[2] Public Utilities Code § 8388.5(c)(1).

Electric Company ("PG&E"), San Diego Gas & Electric Company ("SDG&E"), and SCE to file a Phase 1 application[3] requesting Commission approval of proposals for a benefit-cost ratio methodology, audit methodology, and cost recovery conditions for any application filed under SB 884.[4]

At the Prehearing Conference in this proceeding, President Reynolds offered remarks regarding the SB 884 undergrounding program and certain expectations for the program. As part of those remarks, he stated that when "the Commission adopted [Resolution] SPD-37 last December and set up the SB 884 program, [he] made clear [his] own expectation that any undergrounding decisions for PG&E for 2028 and beyond should be made within the framework of the SB 884 program and not in the general rate case."[5] President Reynolds also noted that he was "surprised at this point, most especially in the case of PG&E, which has an active general rate case before th[e] Commission right now, that no electric undergrounding program has been filed with the Office of Energy Infrastructure Safety."[6] He then stated that he had a "specific set of questions [he'd] like to direct to the utilities and, again, most especially to PG&E."[7]

President Reynolds raised the following three questions and asked each of the three utilities—PG&E, SDG&E, and SCE—to provide written responses to the questions by April 10:

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[3] The Commission's guidelines for the SB 884 undergrounding program set forth a three-phased process for implementation of SB 884's requirements. In Resolution SPD-37, the Commission required PG&E, SDG&E, and SCE to file a "Phase 1 Application" requesting Commission approval of proposals for a benefit-cost ratio methodology, audit methodology, and cost recovery conditions for any application filed under SB 884. If a utility chooses to file an electric undergrounding plan under SB 884, that plan is reviewed and approved or denied by the Office of Energy Infrastructure Safety. Then, in Phase 2, the Commission reviews and may conditionally approve or deny an application for the undergrounding plan's costs. Phase 3 consists of the plan's implementation, progress reporting, and ongoing monitoring.

[4] Resolution SPD-37, p. 37, Ordering Paragraph 12.

[5] March 27, 2026 Prehearing Conference Transcript (Tr.) at p. 4.

[6] Prehearing Conference Tr. at p. 6.

[7] Prehearing Conference Tr. at p. 7.

- "First, why have you not yet filed electric undergrounding plans with the Office of Energy Infrastructure Safety?
- Second, when do you expect to file your plan with Energy Safety?
- And third, 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?"[8]

II.

RESPONSES TO QUESTIONS

Below, SCE responds to each of the three questions raised at the Prehearing Conference.

1. SCE has not filed an electric undergrounding plan under SB 884 with the Office of Energy Infrastructure Safety because SCE has not reached a final determination as to whether it will file such a plan. SCE filed its Test Year 2025 General Rate Case ("GRC") application in May 2023, before the Commission adopted Resolution SPD-15 in March 2024 to establish an expedited utility distribution undergrounding program. SCE's 2025 GRC application included SCE's forecast for its targeted undergrounding program from 2025 through 2028. On September 23, 2025, the Commission issued its decision in SCE's 2025 GRC, including authorizing SCE to underground 212 miles of distribution infrastructure in SCE's High Fire Risk Areas from 2025 through 2028.[9]

SCE plans to file its Risk Assessment and Mitigation Phase ("RAMP") application in May 2026 and its 2029 GRC application in May 2027, and SCE has not yet determined whether

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[8] Prehearing Conference Tr. at pp. 7-8.
[9] Decision (D.) 25-09-030, p. 373.

the SB 884 program would be the proper venue for any planned targeted undergrounding beyond 2028.

2. As noted above, SCE has not reached a final determination as to whether it will file an electric undergrounding plan pursuant to SB 884 and therefore cannot provide an expected filing date.

3. SCE understands the third question to primarily relate to the Commission's stated expectation that any undergrounding decisions for PG&E for 2028 and beyond should be made within the framework of the SB 884 program and not in PG&E's general rate case.[10] As noted above, the Commission's decision in SCE's 2025 GRC authorized funding for SCE's targeted undergrounding program through 2028. SCE continues to evaluate potential future plans for the targeted undergrounding program and the appropriate forum to seek regulatory review of any such plans.

Respectfully submitted,

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[10] *See* Prehearing Conference Tr. at p. 4.