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Attachment B: ***September 2025 Biannual Energization Report Review***

Guidehouse
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September 2025 Biannual Energization Report Review

Prepared for:

California Public Utilities Commission

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List of Acronyms

- **AFS:** Applicant Final Submission
- **BER:** Biannual Energization Report
- **CPUC:** California Public Utilities Commission
- **Decision 24-09-020:** the Decision or D.24-09-020
- **ESJ:** Environmental and Social Justice
- **IOU:** Investor-Owned Utility
- **MPU:** Main Panel Upgrade
- **PG&E:** Pacific Gas & Electric Company
- **SCE:** Southern California Edison Company
- **SDG&E:** San Diego Gas & Electric Company

Glossary of Terms

- **Biannual Energization Reports:** Submitted by IOUs on March 31 and September 30 of every year to the CPUC pursuant to D.24-09-020.
- **Complete Applications:** Energization projects that have completed the initial customer application process known as Step 1 (Customer Intake) and moved on to Steps 2-8 of the energization process.
- **Data Sufficiency:** Availability and reliability of data (see Section 2.4).
- **End-to-End Cycle:** The completion, by IOUs and customers, of all eight energization steps, starting with Intake, and ending with Service Energization.
- **Energization Targets:** Average and maximum time periods for the IOUs to complete customer energization requests as identified in Tables 1 and 2 from D.24-09-020 (see Section 2.2 in the report); applicable only to steps within the IOUs' control.
- **Energization Target Reporting Requirements or Data Submission Template:** Available in Appendix B of D.24-09-020.
- **IOU Narrative Report:** Document provided by IOUs for compliance with the BER requirement describing their respective findings.
- **IOU Data Submissions:** Data in Microsoft Excel workbooks supporting respective IOU Narrative Reports for compliance with the BER requirement.
- **Main Panel Upgrade:** Upgrades that do not require that the IOU perform in front of the meter upgrades such as an upgrade to the service line, as defined in D. 24-09-020. MPU project data are required to be included in an IOU's BER.
- **March 2025 Biannual Energization Report:** Documentation provided by IOUs on March 31, 2025, that includes the "IOU Narrative Report" and "IOU Data Submissions".
- **Missing Data:** Data provided by IOUs as "Not Provided," "Blank," "Unknown," "Pending Data Process Improvement Initiative," or "Not Available".
- **Outlier Data:** Project data violating an outlier criterion as defined in this report.
- **Outlier Project:** Project violating a timeline outlier criterion and subsequently removed from the dataset to measure IOU performance relative to energization targets compliance item.
- **September 2025 Biannual Energization Report:** Documentation provided by IOUs on September 30, 2025, that includes the "IOU Narrative Report" and "IOU Data Submission".
- **Tariff Project:** Projects that are under electric utility tariffs that govern electric service line or distribution line extensions for electric service upgrade or new homes, businesses, and charging stations for electric vehicles. Applicable electric rules include 15,16, 29 and 45.

Report Disclaimer

The March 2025 and September 2025 Biannual Energization Reports represent the investor-owned utilities' (IOU) initial efforts to meet the requirements in Decision 24-09-020 ("the Decision"). The IOUs state in their respective reports they have not implemented many of the data collection and reporting process adjustments needed to meet the Decision's requirements. The IOUs also note in their respective reports that they have a plan and timeline to collect most of the relevant data to meet the Decision's requirements.

Guidehouse analyzed data from the reports based on a framework proposed for use in future assessments. Guidehouse determined the data were insufficient to satisfy the CPUC's requirements in Ordering Paragraph 17 of the Decision for an energization targets assessment. The insufficient data finding means that the contents of this report are directional and **do not constitute a final determination** of IOU performance relative to the Decision's energization target requirements during the reporting periods ending March 31, 2025, or September 30, 2025.

1. Executive Summary

Background

On September 17, 2024, the California Public Utilities Commission (CPUC) issued Decision 24-09-020 ("the Decision"), which implements the legislative mandates of Senate Bill (SB) 410 and Assembly Bill (AB) 50 related to energization project timelines by establishing enforceable performance metrics and reporting protocols for each investor-owned utility (IOU).[1,2,3] The Decision introduced a comprehensive reporting framework that includes target average and maximum timelines, eight statewide steps to energization ("eight steps"), and a requirement for IOUs to submit Biannual Energization Reports (BER) using a standardized data submission template every six months.

The IOUs submitted their first BER on March 31, 2025, covering projects with complete applications between January 31, 2023, and December 31, 2024. Six months later, on September 30, 2025, the IOUs submitted their second BER, which included projects with complete applications between January 31, 2023, and June 30, 2025.

For these reporting periods, the IOUs provided their respective findings in two separate but related documents: IOU Data Submissions and IOU Narrative Reports. Notably, the IOU Data Submissions included projects with completed application dates before the Decision, which **did not fall under the Decision's guidance**, and projects that completed applications after the Decision was issued, which **did fall under the Decision's guidance**.

The CPUC engaged Guidehouse to conduct data cleaning and analysis of the September 2025 BERs[4] submitted by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E). This document summarizes Guidehouse's findings from the analysis.

[1] California Public Utilities Commission. (2024, September 17). Decision 24-09-020: Decision establishing target energization time periods and procedure for customers to report energization delays (Rulemaking 24-01-018).

[2] California State Legislature, Senate Bill 410 (Powering Up Californians Act), Chapter 394, Statutes of 2023, approved October 7, 2023.

[3] California State Legislature, Assembly Bill 50: Public Utilities—Timely Service: Customer Energization, Chapter 317, Statutes of 2023, approved October 7, 2023.

[4] California Public Utilities Commission (CPUC), *Energization Data Reporting Requirements and Data Reporting Template*.

IOU Data Disclaimer

The IOU Narrative Reports include disclaimers for the contents of their Data Submissions. The IOUs indicated that existing data collection, systems, and process constraints prevented them from providing certain data required by the Decision. The IOUs also highlighted that the data provided in the September 2025 BER relates to projects that began before the issuance of the Decision. They further noted that because the date of the Decision fell inside the reporting period, their reports included projects that were and were not under the guidance of the Decision. Consequently, existing tracking systems were not yet configured to track milestones consistent with the eight steps. At the time of this report:

- PG&E is **still in the process of integrating systems to track all required fields**, and its ability to track specific steps, such as Customer and IOU Site Readiness, is limited. Despite this, PG&E has implemented an approach to isolate the Customer and IOU-controlled timelines by exclusively applying any overlap to the customer step.
- SCE made efforts to align tracking systems with the eight steps; however, the current system and tools **do not support the level of data granularity required**. Furthermore, before the September decision, SCE was unable to differentiate between IOU and non-IOU time spent in each step.
- SDG&E has worked to align its previously implemented project management philosophy to the Eight Steps and address the **distinction between utility and customer responsibility** but emphasized the **need for funding** to support system improvements.

Moreover, where data were provided, these tracking system configuration constraints adversely impacted the accuracy of reported information. For example, the IOUs highlighted challenges in reporting on the eight steps, particularly isolating customer and IOU-controlled timelines and handling concurrent steps for tariff projects. Likewise, for main panel upgrades (MPUs), the IOUs were unable to report timing by step and, instead, provided the overall timing to complete the MPU.

The IOUs reported that they are undertaking data collection, systems, and process enhancements to support compliance with the Decision's data-tracking and reporting requirements.

Data Sufficiency Determination

Guidehouse's review of the IOU Data Submission from September 30, 2025, confirmed the IOU's data disclaimers, determining **insufficient data** were available to satisfy the CPUC's analysis requirements under Ordering Paragraph 17 of the Decision for an energization targets assessment. Guidehouse reached this determination by comparing the data provided by the IOUs relative to the reporting requirements to assess whether sufficient data existed to evaluate IOU performance against the energization targets. The comparison consisted of a **data availability assessment**, which determined the percentage of projects missing required data points, and a **data reliability assessment**, which compared IOU disclaimers in their narrative report with findings in their data submission to establish whether provided data points were valid.

Analysis of September 2025 Report

Although Guidehouse determined that the data provided by the IOUs in their September 2025 Reports were not yet robust enough to assess the IOU's progress toward achieving the energization targets, this report summarizes an interim analysis of the reported timelines for IOU-controlled steps and the **end-to-end cycle**. The purpose of this interim analysis is to **provide recommendations for improving future analyses in subsequent reporting periods**. The analysis covers:

- Tariff Performance Trends
- Main Panel Upgrade Performance Trends
- Environmental and Social Justice Considerations

Guidehouse's findings from the interim analysis **do not constitute a final determination** of IOU performance relative to the energization target requirements set forth in the Decision for reports due on September 30, 2025.

Findings

The analysis finds that data sufficiency challenges prevent an assessment of the IOUs' progress relative to the energization targets. Guidehouse recognizes the need to improve energization timeline reporting while supporting ongoing IOU data improvement efforts.

2. Introduction

This document outlines Guidehouse's analyses to support the CPUC evaluation of timelines associated with IOU energization of load in California. The IOUs submitted the data and associated Narrative Reports on September 30, 2025, in response to CPUC D.24-09-020.[5] Under the Decision, the IOUs must file the Biannual Energization Reports (BER) twice a year, in March and September.

2.1 Background

On September 17, 2024, the CPUC issued D. 24-09-020 implementing the legislative mandates of SB 410 and AB 50 related to energization project timelines by setting enforceable performance metrics, reporting protocols, and planning standards for each IOU.

SB 410, known as the Powering Up Californians Act, requires the CPUC to establish reasonable average and maximum energization timeframes and a procedure for customers to report delays. It also mandates that IOUs report their performance against these energization targets and explain any deviations.

AB 50, known as the "Public Utilities—Timely Service: Customer Energization" bill, requires annual reporting on energization timelines, delay causes, and constraints such as staffing or equipment shortages. Together, SB 410 and AB 50 lay the foundation for the Decision.

2.2 Decision 24-09-020

The Decision implemented mandates in SB 410 and AB 50 that direct the CPUC to establish reasonable statewide energization targets for all energization projects, to develop a comprehensive data reporting process, and to establish a customer reporting process for energization project delays.

The CPUC established the steps to energization ("eight steps") depicted in Table 1, designed to encourage transparency of the energization workflow and clearly delineate responsibilities between IOUs and customers. To support consistent data tracking, the Decision also introduced a standardized Data Collection Template (Appendix B of the Decision) aligned with the eight-step process. IOUs are required to submit a BER using this template every six months.

[5] California Public Utilities Commission. (2024, September 17). Decision 24-09-020: Decision establishing target energization time periods and procedure for customers to report energization delays (Rulemaking 24-01-018).

Table 1. Eight Steps to Energization

Step		Responsible Party	Description
1	Customer Intake	Customer	The customer submits a service energization request; the large electric IOU reviews the customer submission, educates the customer on the energization process and submission requirements; the Applicant Final Submittal (AFS) date is established. The energization clock starts once the large electric IOU notifies the customer that its application is deemed complete.
2	Engineering & Design	IOU	The large electric IOU completes its field visit(s), engineering study, prepares the project design and determines the project cost.
4	Customer Dependencies	Customer	The customer obtains necessary permits, secures easements, signs contracts, pays necessary required fees, and receives and documents any other required third-party approval.
5	Utility Dependencies	IOU	The large electric IOU submits documentation for permits and easements and completes other large electric IOU-required approvals related to the specific project and/or site.
6	Customer Site Readiness	Customer	For non-Rule 29/45 projects (Rule 15 and/or Rule 16): the step reflects the time when a customer requests a pre-construction meeting and inspection from utility, and the customer-required onsite construction is deemed complete after the customer schedules and completes civil construction. For these projects, the energization clock starts when the customer is cleared for construction and stops when the customer releases the site to the large electric IOU for utility-side construction and energization. For Rule 29/45 projects: the customer requests a pre-construction meeting and inspection from a large electric IOU. The energization clock would stop once a pre-construction meeting and inspection are scheduled.
6	Large Electric IOU Site Readiness	IOU	For non-Rule 29/45 projects: large electric IOU completes pre-construction meetings and inspections. The energization clock would start when the customer requests the pre-construction meeting and inspection and pauses at the first available date when the utility representative can perform the inspection and meeting.
7	Construction	IOU	The large electric IOU schedules and completes electrical construction, including traffic control, scheduling outages, and other construction activities.
8	Service Energization Provided to Customer	IOU	All final inspections are scheduled, and if performed by the large electric IOU, completed; the site is “energized,” allowing the customer to start receiving service.

Source: CPUC Decision 24-09-020

The CPUC’s Energy Division requested that Guidehouse conduct data cleaning, review, and evaluation of data submitted by Pacific Gas & Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) before the Decision. This analysis informed the CPUC’s establishment of the average and maximum energization targets documented in the Decision, replicated in Table 2.

Table 2. Energization Target in Days

Energization Type	Average	Maximum
Electric Rule 15 – Distribution Line Extensions	182 calendar days (6 months)	357 calendar days (11.9 months)
Electric Rule 16 – Service Line Extensions	182 calendar days (6 months)	335 calendar days (11.1 months)
Electric Rule 29/45 – Electric Vehicle Infrastructure	182 calendar days (6 months)	335 calendar days (11.1 months)
Combined Electric Rule 15 and 16 **OR** Combined Rule 15 and 29/45	182 calendar days (6 months)	306 calendar days (10.2 months)
Main Panel Upgrade[6]	30 business days (1.5 months)	45 business days (2.1 months)

Source: CPUC Decision 24-09-020

2.3 September 2025 Biannual Energization Report

The IOUs' September 2025 BER captures projects **with complete applications between January 31, 2023, and June 30, 2025**, including those previously reported in the March 2025 BER. Because the reporting period included dates prior to issuance of the Decision on September 17, 2024, the dataset contains projects that began before and after the Decision.

Each IOU submitted a Narrative Report describing its findings and the challenges associated with meeting the Decision requirements, and a data submission containing raw project data in a Microsoft Excel workbook aligned with Appendix B of the Decision. The data submissions were comprised of tariff and main panel upgrade[7] (MPU) projects classified as "Completed," "Ongoing," or "Cancelled/Rejected," at the time the data were extracted for their respective reports. Each project record contained multiple data fields, including timeline dates, cost data, capacity information, and other contextual variables.

2.4 Data Sufficiency Determination

After reviewing the IOU Data Submissions, Guidehouse determined that the available data were **insufficient** to conduct a comprehensive analysis of the progress toward meeting the average and maximum energization targets established by the Decision. This section summarizes the challenges and considerations that informed this determination.

[6] The Decision does not provide a calendar day target for MPUs. The month notation is approximate calendar days.

[7] MPU projects are upgrades that do not require that the IOU perform in front of the meter upgrades such as an upgrade to the service line, as defined in D. 24-09-020.

Guidehouse's determination of data sufficiency was based on an assessment of data availability and reliability. The data sufficiency threshold categorizes data submitted by the IOUs into two types: Compliance Data Points and Contextual data points, where:

- **Compliance Data Point:** A data element included in the IOUs' data submission that is required to assess performance against the decision's targets. These data points include tariff type, IOU-controlled steps, aggregate IOU-controlled, and end-to-end cycle timelines.
- **Contextual Data Point:** A data element included in the IOUs' data submission that provided project-specific information about an energization project. Examples include requested capacity, project costs, trigger for upstream capacity needs, concurrent timelines, and reasons for exceeding the decision targets.

Sufficient data meets the following criteria:

1. **Available**, meaning:
    a. At 95% of data points are reported for compliance data points; ***and***
    b. At least 75% of data points are reported for contextual data points.
2. **Reliable**, meaning the data contains minimal threats to validity.[8]

Insufficient data are defined as data that do not meet the criteria above, including:

1. **Not available**, meaning:
    a. Fewer than 95% of data points are reported for Compliance Data Points; ***or***
    b. Fewer than 75% of Contextual Data Points are reported.
2. **Not reliable**, meaning the data contains threats to validity.

Guidehouse recommends that the CPUC adopt this data sufficiency threshold for future energization reports.

2.5 Data Requirements Assessment

The **data sufficiency assessment** results appear in Table 3. Guidehouse found limited **data availability**, with approximately one-third of the required data points in the Data Submission missing data for over 75% of projects across all IOUs (see Table 20 in Appendix A for the data availability assessment for all data fields). PG&E and SDG&E reported difficulty providing start and end dates, particularly Step 6 – IOU Site Readiness.

[8] Data validity refers to the extent to which data accurately represent the real-world entities, events, or measurements they are intended to describe, per "Experimental and Quasi-Experimental Designs for Research," Campbell, Donald T., Stanley, Julian. (1963).

Section 3.1 further discusses the factors affecting data reliability, including system limitations, difficulty distinguishing between IOU- and customer-controlled time, reliance on customer-provided data, cost reconciliation timelines, challenges linking downstream and upstream projects, difficulties documenting delays, and inconsistent treatment of outliers.

The IOUs are in the process of improving data tracking and collection for future reporting cycles. For example, Table 6 in Section 3.1 provides examples of data challenges and utility-proposed solutions. Additionally, Table 10 in Section 3.3 provides planned IOU initiatives and system enhancements to improve data collection. Overall, while mindful that the IOUs are in the process of improving data tracking, collection, and reporting, Guidehouse found that the IOUs made limited progress toward reporting sufficient data compared to the March 2025 Report.

Table 3. Data Sufficiency Assessment

Sufficiency Criteria	Internal Validity Threat	Key Metric Description	PG&E	SCE	SDG&E
Data Availability	Missing Data	Completed projects missing > 75% of data fields	32 (33%)	36 (37%)	28 (29%)
		Steps missing start and/or end dates for > 20% of completed projects	2	0	6
		Specific energization step with the most missing data	Step 6 End Date - 6%	None had missing data	Step 6 Start Date - 3.5%
		Total Number of data template fields not reported until September 2026 (Table 7)	13	30	20
Data Reliability	Timeline Accuracy data	Ability to provide accurate data for the end-to-end cycle	Yes	Yes	No
		Timelines account for concurrent IOU- and customer-controlled steps	Yes	No	Partially Met
	Environmental and Social Justice (ESJ) data	Use of the CPUC adopted definition for ESJ Communities in data[9]	Partially Met	Partially Met	Partially Met
	Reported Capacity data	Ability to provide accurate project capacity	Partially Met	No	No
	Project Costs data	Ability to provide accurate project costs at the time of energization	No	Yes	No
	Upstream Capacity Project[10] Trigger data	Ability to provide accurate indication of whether a project triggered an upstream capacity project	Partially Met	No	No
	Delays data	Ability to track delays	Partially Met	No	No
	Outlier Treatment data	Ability to identify outliers in data submission	Yes	No	No

**Key: Green: = 0 or Yes, Orange: = >1 or Partially Met, Red: Unavailable or No*

[9] California Public Utilities Commission (CPUC), *Environmental and Social Justice Action Plan*.

[10] In this document, "Upstream Capacity Projects" refers to new or upgrade of circuit and new or upgrade of substation.

3. Data Characterization

In the September 2025 BERs, the IOUs reported on approximately 70,000 tariff projects and 120,000 MPU projects. The tariff dataset included over 90 data fields per project, whereas the MPU dataset included 20 data fields. This report focuses on completed projects. Completed projects account for approximately half of non-cancelled projects across the IOUs. Table 4 summarizes the total dataset by IOU and project status.

Table 4. Project Count Per IOU by Status

Project Type	Index Value	PG&E	SCE	SDG&E
Tariff	**Total Tariff Projects**	**25,207**	**28,366**	**16,062**
	Cancelled	2,966	4,876	644
	In Progress	12,918	16,453	5,818
	Completed	10,043	7,037	9,600
	Percent Completed of Non-cancelled Tariff Projects	44%	30%	62%
MPU	**Total MPUs**	**30,077**	**83,078**	**6,181**
	Cancelled	15	3,871	183
	In Progress	2,320	52,010	1,861
	Completed	27,742	27,197	4,137
	Percent Completed of Non-cancelled MPU	92%	34%	69%

As described in Section 2.4, Guidehouse characterized the IOU-submitted data as insufficient to assess IOU performance relative to the energization targets for the September 30, 2025, reporting period. This section provides further detail into this data characterization using:

1. IOU self-reported disclaimers of data
2. Guidehouse's data collection findings
3. IOU-identified future enhancements and improvements to their reporting approach

3.1 IOU Self-Reported Data Disclaimers

The IOUs described their challenges in their September 2025 Report regarding the quality and accuracy of the data. The key takeaway is that the IOUs need improved data collection methods. The IOUs indicate that current data limitations may result in average and maximum timeline estimates that are not suitable for informing decisions about potential changes to the targets or explaining observed outcomes. Table 5 summarizes the key challenges reported by each IOU. Collectively, these statements suggest that the current dataset may produce average and maximum timeline metrics that do not reliably reflect actual project timelines. As a result, the IOUs caution that these results may not be appropriate for informing decisions about potential modifications to the CPUC's adopted energization targets or for explaining the causes of observed outcomes.

Specific reporting challenges include:

- PG&E is **still in the process of integrating systems to track all required fields**, and its ability to track specific steps, such as Customer and IOU Site Readiness, is limited. Despite this, PG&E has implemented an approach to isolate the Customer and IOU-controlled timelines by exclusively applying any overlap to the customer step.
- SCE made efforts to align tracking systems with the eight steps; however, the current system and tools **do not support the level of data granularity required**. Furthermore, before the September decision, SCE was unable to differentiate between IOU and non-IOU time spent in each step.
- SDG&E has worked to align its previously implemented project management philosophy to the Eight Steps and address the **distinction between utility and customer responsibility** but emphasized the **need for funding** to support system improvements.

Table 5. IOU-Reported Capabilities to Meet the Decision Reporting Requirements

Narrative Topic	IOU Commentary
Reporting Period	The IOUs noted that the reporting period itself may affect reported average timelines against targets • IOUs highlight that, as the date of the Decision fell inside the reporting period, their reports included projects that were and were not under the guidance of the Decision • PG&E emphasized that limitations of the current reporting period may statistically skew lower on average because of the exclusion of potentially longer-running in-progress projects, and energization timelines may increase as in-progress projects become completed. PG&E emphasized that the current reporting period may show artificially lower average timelines because it excludes longer-running in-progress projects, and reported timelines are expected to increase once these projects are completed

Narrative Topic	IOU Commentary
Overlapping IOU and Customer Timelines	As the tariff target timelines are specific to IOU-controlled steps, IOUs noted how critical it is in identifying IOU-controlled time and highlighted challenges with separating IOU, Customer, and third-party time for overlapping steps • For overlapping IOU and customer steps, PG&E assigned time to the Customer • For concurrent IOU phases, PG&E aggregated those days as a single day within the total IOU time count • For agency/permitting time, PG&E excludes overlapping time from the IOU-controlled time • SCE, at the time of reporting, relied on tracking systems that cannot track activities as they occur simultaneously, and provided information that includes timing for potentially overlapping SCE, customer, and third-party controlled activities within each of the Eight Steps • SDG&E, at the time of reporting, did not have the system to track IOU-controlled time separate from customer time and noted the average of total calendar/business days of each of the Eight Steps did not accurately reflect their overall energization timeline
Approach to ESJ	IOUs provided details on how they defined and identified “Disadvantaged Community,” “Tribal Community,” or “Underserved Communities,” but did not take a uniform approach • PG&E and SCE’s “Underserved Communities” definition differs from the CPUC definition • SCE used a geographic area dataset from the California Office of Environmental Health Hazard Assessment website that identified geographic areas as Disadvantaged Communities (DACs) based on CalEPA’s SB 535 designation. Tribal Community projects were identified using the same dataset from the Office of Environmental Hazard Assessment (OEHHA) • SDG&E incorporated Geographic Information Systems (GIS) files that meet criteria outlined in PUC Section 1601(e)(3) and 1601(e)(4)
Costs at Time of Energization	IOUs provided costs at the time of project energization, but highlighted data inaccuracy • PG&E and SDG&E indicated that the reported costs at the time of energization may not be reconciled, as that process can take 6 to 12 months after energization, and may include negative values • SCE identified negative cost components in their dataset as outliers and removed those projects from their Data Submission
Site Capacity	IOUs found challenges in reporting on the requested site capacity • SCE did not provide data on the total site capacity requested • SDG&E relied on customer-provided data submitted during the initial service inquiry, and noted this data may potentially inflate values and customer misinterpretations of the required data
Delay Reporting	IOUs are making efforts to better define “delays,” but face reporting difficulties • PG&E reported they are exploring ways to implement the recently proposed “delay” definition, but noted most projects experience some form of customer-based delay • SCE’s current system of record does not track delays, but published a Customer Fact Sheet in July 2025 that provided a link to the Customer Project Energization Delay Reporting Form • SDG&E provided definitions for “customer” and “IOU” delayed projects, but faced system limitations when attempting to comprehensively track and differentiate IOU-attributable and customer-driven delays across project lifecycles

Narrative Topic	IOU Commentary
Approach to Outliers	IOUs addressed outliers, but not uniformly • PG&E removed outliers from their aggregate calculations, but left them in their reported projects and identified the outliers with a separate field • SCE removed outliers from their aggregate calculations and reported projects • SDG&E removed outliers from their aggregate calculations, but left them in their reported projects and did not identify the outliers with a separate field
MPU Reporting	IOUs indicated significant data gaps in reporting for MPUs • PG&E stated MPU reporting does not include several of the required reportable fields because of the internal order and notification structure they use, noting MPUs are captured under an annual blanket order • SCE identified five data points related to costs that do not apply to MPUs • SDG&E noted MPU end-to-end cycle data have large amounts of missing or unknown data

The IOUs also highlighted their specific challenges for reporting the calendar/business days for each of the energization steps and their proposed solutions, as depicted in Table 6.

Table 6. IOU Reported Step-Specific Challenges and Proposed Solution

IOU	Step	Challenge	Proposed Solution
PG&E	Step 6 – IOU Site Readiness	• Measured by time between requested inspection date and first inspection date • Only available for 557 of 8,923 jobs	• Remediated with the Salesforce tool launched in March 2025
PG&E	Step 8 – Energization	• Measured by the time between construction completion and meter set • Only available for < 50% of jobs	• Improved tracking of Service Energization phase via refinements to internal meter set data
SCE	Steps 1 through 3 – Intake, Engineering & Design, Customer Dependencies	• Overlap because of partially complete applications, upstream load projects, and projects with applicant design	• Continued refinement and enhancement of tracking tools
SCE	Steps 3 through 6 – Customer/IOU Dependencies, Customer/IOU Site Readiness	• Overlap and pauses to work applied to the incorrect step • Third-party processing time applied to the IOU-specific timeline	• Continued refinement and enhancement of tracking tools
SCE	Step 7 through 8 – Construction, Energization	• Time required for third-party inspections/panel releases, processing traffic control permitting, and multi-phased construction projects	• Continued refinement and enhancement of tracking tools
SDG&E	Step 1 – Intake	• Inconsistent intake process, such as effort to develop viable request and “parent” and “child” job structure, led to challenges tracking the start and end of the intake period	• Enhancements for customer intake experience via several initiatives currently underway • Removes Step 1 from their end-to-end cycle timeline calculation
SDG&E	Step 8 – Energization	• Definition of when a project is energized, as not all projects include meters	• Implemented a multi-step reasoning check where Step 8 concludes 1) for Rule 15-only and Rule 29/45 jobs when the transformer is set; 2) for Rule 16 jobs when the meter is set; 3) for Combined Rule 15/16 jobs at the first meter set date; and 4) for the main panel unit, the same day as “reconnection”

The IOUs identified gaps in specifically requested data fields of the Data Submission Template and provided context on when the data would be available. Table 7 summarizes these data gaps. While PG&E and SCE identified the reporting period during which they would fill data gaps, SDG&E provided estimates of the timeline for system enhancements to facilitate data collection.

Table 7. Data Gaps Remaining and Timeline for Addressing Gaps (Number of Data Points)

IOU	Project Type	Total Data Gaps	March 31, 2026	September 30, 2026	March 31, 2027	Unknown Timeline for Addressing Gaps
PG&E	Tariff	13	5	2	0	6
SCE	Tariff	30	6	4	0	20
	MPU	12	1	0	0	11[11]
SDG&E[12]	Tariff	20	0	2	18	0
	MPU	5	0	0	5	0

Since the March 2025 Report, PG&E has included added[10] data points primarily associated with reporting on upstream capacity and flexible service. However, of the data points PG&E has yet to provide, nine are delayed. The data gaps identified by SCE and their associated timeline for addressing gaps remain unchanged from the March 2025 Report, but SCE notes that their Building, Renovation, and Project Planning Portal (BRPPP) was launched on July 24, 2025. The BRPPP will allow SCE to collect eight missing data points, with seven available by the March 31, 2026 report.

3.2 Data Collection Findings

Guidehouse conducted a review of the IOUs' September 2025 Report, cross-referencing IOU data disclaimers from the Narrative Reports with their Data Submissions, to identify system limitations with data collection. This section summarizes these findings as they relate to timeline data, reporting on environmental and social justice communities, contextual data associated with project-specific factors such as cost, capacity, upstream projects, and delays, rules for data exclusion and outlier treatment, and MPUs.

3.2.1 Timeline Data

A key focus of Guidehouse's review of IOUs' data disclaimers was the availability and reliability of data associated with individual steps and aggregate timelines. Guidehouse noted that, in PG&E and SDG&E's reports, a significant number of completed tariff projects are missing either a start or an end date for any of the Eight Steps. In contrast, SCE provided start and end dates for all eight energization steps. Table 8 shows the percentage of tariff projects completed with start and end dates by step.

[11] Of the 11 MPU data gaps indicated by SCE, 5 data points were deemed not applicable to MPU.

[12] For SDG&E, the date when data gaps are filled is based on the SDG&E-estimated system enhancement timeline assuming the system enhancement begins in March 2026.

Table 8. Percent of Tariff Projects with Step Start and End Date

Step	Start/End	PG&E	SCE	SDG&E[13]
1 Intake	Start Date	100%	100%	100%
	End Date	99.5%	100%	100%
2 Engineering & Design	Start Date	99.5%	100%	100%
	End Date	100%	100%	77.4%
3 Customer Dependencies	Start Date	89.6%	100%	65.8%
	End Date	89.6%	100%	11.3%
4 IOU Dependencies	Start Date	99.9%	100%	17.3%
	End Date	99.1%	100%	17.2%
5 Customer Site Readiness	Start Date	99.9%	100%	90.6%
	End Date	100%	100%	67%
6 IOU Site Readiness	Start Date	6.3%	100%	3.5%
	End Date	6.2%	100%	26.7%
7 Construction	Start Date	100%	100%	79.4%
	End Date	100%	100%	100%
8 Energization	Start Date	100%	100%	100%
	End Date	47%	100%	100%

PG&E identified challenges with accurate timeline reporting for Step 6 – IOU Site Readiness and Step 8 – Energization, as described in Table 6. The data show that only 6.3% and 47% of completed tariff projects have start dates reported for Step 6 and end dates reported for Step 8. While SDG&E identifies Step 1 – Intake as a main difficulty for accurate reporting, they provided complete data for this step. They struggled, however, with Step 3 – Customer Dependencies, Step 4 – IOU Dependencies, and Step 6 – IOU Readiness.

Even when start and end dates or calendar/business days are available for individual steps, the IOUs note in their narrative that these data may be unreliable. They cite limitations in their current tracking system, particularly distinguishing between IOU- and customer-controlled steps.

The IOUs also emphasize that the linear, phased-based framework of the eight steps does not reflect energization projects typically progress, as activities often occur concurrently and may not follow a strictly sequential order. As a result, timelines reported at the individual step level may not align with aggregate project timelines. Both SDG&E and SCE note in their narratives that

[13] Guidehouse removed completed tariff projects from SDG&E's Data Submission based on SDG&E's stated approach to outliers in their Narrative Report.

summing the durations of the eight steps for a project may not equal the overall project energization timeline.

PG&E implemented a methodology to delineate time across each of the energization steps (see Table 5) and identified the amount of concurrent time for all but three projects in its data submission. Although SDG&E did not describe a methodology for accounting for concurrent timelines, it reported concurrent time for 17% of completed tariff projects in its data submission. SCE did not report any data on concurrent steps, noting that its current systems of record do not support tracking this information.

SCE and SDG&E indicated that timelines aggregating customer and IOU-controlled steps were not reliable due to the challenges isolating the timing between the responsible parties. SCE explicitly states in its narrative that "because SCE is unable to exclude non-IOU time from available project data, SCE cannot compare its timelines for these projects to CPUC-established targets which are based on IOU-controlled time." SCE states in their narrative that, because of increased manual tracking, Rule 29 and Rule 15 / Rule 29 projects can distinguish between customer and IOU time more accurately.

SDG&E refrained from using Customer- or IOU-controlled timelines in the Data and Reporting Insights section of their narrative, instead using the aggregate completed application-to-energization timeline data, which it described as "represents the most accurate reflection of current performance available under existing system capabilities."[14] The SDG&E Data Submission findings substantiate SDG&E's acknowledgement in its narrative of the accuracy of the IOU-controlled timelines. The Data Submission reported an average of only 13 days to complete IOU-controlled steps, which is approximately 93% shorter than the target average.

Statistical analysis of the IOUs' data submissions for the end-to-end cycle timeline—including measures such as standard deviation, average, and frequency—does not indicate unreliable data. However, SDG&E notes in its narrative that challenges associated with Step 1 – Intake led them to omit the Step 1 timeline from their end-to-end cycle timeline, instead using the date of the AFS, which corresponds to the start date of Step 2, as the beginning of the end-to-end cycle.

3.2.2 Environmental and Social Justice Reporting

When reporting on whether projects were located in ESJ communities, the IOUs used different definitions and data sources to identify those projects. Table 9 provides ESJ community definitions found within CPUC's ESJ Action Plan.[15]

[14] SDG&E Biannual Energization Report, September 2025. Page 21.

[15] California Public Utilities Commission (CPUC), *Environmental and Social Justice Action Plan*.

Table 9. ESJ Action Plan Version 2.0 ESJ Community Definitions

ESJ Community Type	Definition	Location in ESJ Action Plan V2
Disadvantaged Community (DAC)	The entire service area of a community water system, or community therein, in which the median household income is less than 80% of the statewide annual median household income level	Page 73
Underserved Community	A community that meets one of the following criteria: • Is a "disadvantaged community" as defined by subdivision (g) of Section 75005 of the Public Resources Code • Is included within the definition of "low-income communities" as defined by paragraph (2) of subdivision (d) of Section 39713 of the Health and Safety Code • Is within an area identified as among the most disadvantaged 25% in the state according to the California Environmental Protection Agency (CalEPA) and based on the most recent California Communities Environmental Health Screening (CalEnviroScreen) • Is a community where at least 75% of public-school students in the project area are eligible to receive free or reduced-price meals under the National School Lunch Program • Is a community located on lands belonging to a federally recognized California Indian tribe	Page 77
Tribal Community	Land within any Indian reservation as defined in 18 U.S.C 1151 subsection (a)	Page 2

PG&E only defined Underserved Community as either 1) census tracts with median household incomes at or below 80 percent of the statewide median income; or 2) census tracts with a median household income at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted under Health and Safety Code Section 50093. While this definition aligns with the first and second criteria for "Underserved Community" in the CPUC ESJ definition, PG&E uses "census tracts" as its geographic unit. PG&E does not use a disadvantaged community definition that is defined in Public Resources Code section 75005(g). PG&E does not clarify whether or how it equates census tracts with communities under the statutory definition, nor does it provide any further context on how it defined DAC or Tribal Community, or whether it incorporated the other Underserved Community criteria.[16]

SCE identified Disadvantaged and Tribal Communities using CalEPA's designation for the purpose of SB 535, using a geographic area dataset from the California Office of Environmental Hazard Assessment (OEHHA) website.[17] This dataset identifies the following areas:

- The highest scoring 25% of census tracts from CalEnviroScreen 4.0 and census tracts scoring in the top 5% of the Pollution Burden indicator, that do not have a

[16] California Public Resources Code § 75005(g).

[17] California Office of Environmental Hazard Assessment. SB 535 Disadvantaged Communities.

CalEnviroScreen score due to unavailable or unreliable population characteristics indicator data.

- Census tracts currently identified as disadvantaged but not included in the highest scoring 25% census tracts in version 4.0 (i.e., census tracts previously identified as disadvantaged under CalEnviroScreen 3.0, including those in the highest-scoring 25% and those with the highest 5% Pollution Burden scores without an overall CalEnviroScreen score).
- Federally recognized tribal areas as identified by the Census in the 2021 American Indian Areas Related National Geodatabase.

While the CPUC ESJ definitions encompass the categories of "Underserved Community" and "Tribal Community," they do not explicitly state that these designations include community water systems—or the communities they served—where the median household income is less than 80% of the statewide median household income—the threshold the CPUC ESJ definition provides for a "Disadvantaged Community."

For "Underserved Communities," SCE leveraged a California Energy Commission geographic area dataset that identifies underserved communities as geographic areas with median household incomes at or below 80% of statewide median income or with a median household income at or below a threshold designated as low income by the Department of Housing and Community Development income limits adopted under Health and Safety Code Section 50093. This aligns with PG&E's approach to "Underserved Communities," but, as with PGE's approach discussed above, only captures the first two criteria of the CPUC ESJ definition for "Underserved Communities" and does not address the distinction between census tracts and communities under Public Resources Code section 75005(g).

SDG&E noted in its narrative that determining whether a project is in an ESJ community is challenging because this information can be tracked only after the end-user is identified through a billing account, and the data is not readily available at the time a job is planned. SDG&E described how they identify ESJ communities via GIS, which meet the following criteria from Public Utilities Code Section 1601(e):

- **Section 1601(e)(3):** Projects located within areas designated as among the most disadvantaged 25 percent in the state, based on the most recent CalEnviroScreen data published by CalEPA.
- **Section 1601(e)(4):** 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 data collection is achieved by overlaying school district data with project geographies.

While these two criteria align with aspects of the CPUC ESJ definition for an Underserved Community, they do not meet the CPUC ESJ definition's criteria.

The IOU's use of different definitions of ESJ communities led to deviations in their approach to identifying projects in ESJ communities in the IOU Submissions. PG&E used a 1:1 association for projects that fell within ESJ communities, while SCE and SDG&E assumed a project could fall into multiple ESJ communities and reported the applicable projects, e.g., "DAC & Underserved," "DAC, Underserved, Tribal" or "Tribal & Underserved."

3.2.3 Contextual Data

Reporting of contextual data was inconsistent across the IOUs, with significant variation in the completeness of the required project-specific data.

For Total Site Capacity data, PG&E and SDG&E provided data for 85% and 41% of their projects, respectively. SCE did not provide any data, though they estimate the data will be available by the March 2026 Report.

Of the data that was provided by PG&E and SDG&E, over 90% of projects requested less than 1 MW of capacity, while approximately 1% of projects reported by PG&E and 5% of projects reported by SDG&E required greater than 2 MW of capacity. Within projects requiring more than 2 MW of capacity, the amount varied substantially, reaching 690 MW for PG&E and 11,220 MW for SDG&E. Such extremes in reported capacity align with SDG&E's stated concerns about the validity of user-provided data, as customers may overstate or misinterpret the units for reporting (e.g., Amps instead of kWs).

PG&E and SCE provided data showing that 12% and 18% of their respective tariff projects had negative reported costs at the time of energization. 59% of SDG&E's tariff projects had reported costs less than or equal to $5,000 at the time of energization. This aligns with PG&E and SDG&E's Narrative Reports describing challenges associated with the 6–12-month lag for reconciling energization costs. For SCE, which treated projects with negative costs at the time of energization as outliers and removed them from their Data Submission, approximately 70% of their projects had costs less than or equal to $5,000.

For the Project Triggered for Upstream Capacity data point, PG&E and SDG&E provided data for all projects. SDG&E, however, provided a "No" for every project and noted this data point requires system enhancements with an estimated 12-month duration.

PG&E improved reporting on the upstream capacity data points through a data enhancement project for the distribution of upstream capacity tracking, but noted the enhancement is incomplete because of the complexity of associating a single downstream project with upstream capacity work. PG&E reported that 15 of its completed, non-outlier tariff projects required upstream capacity upgrades, less than 1% of its total completed, non-outlier tariff projects.

SCE did not provide any data for the Project Triggered Upstream Capacity field, noting their systems do not capture all customer projects that contribute to specific capacity upgrades. Their narrative notes that their September 2026 BER should include this data.

Only PG&E provided data explaining why a project exceeded the target average or target minimum, by indicating which of the IOU-controlled steps contributed to the delay. PG&E provided

reasoning for 96% of projects that exceeded the target maximum. PG&E's narrative verified that they currently provide this data for jobs exceeding the target maximum and estimate that the March 2026 BER will include similar data for the target average.

SCE stated that the ability to track this data is not available in their current system of records, and they provided no indication of when it will be available. SDG&E indicates this data will require system enhancement, a project estimated to take 12 months to complete.

3.2.4 Outlier Treatment

This section describes how the IOUs approach excluded data/outliers and how they differ from each other.

In PG&E's Narrative Report, they identified outliers based on the following criteria:

- **Data Sequence Errors**: Any project step where the end date preceded the start date, or whether earlier steps occur after the Step 8 – Energization end date
- **Incomplete Status Verification**: Projects marked as "complete" but missing construction or energization dates, preventing confirmation of closure

Projects that met either of these criteria were excluded from PG&E's aggregate calculations but were kept in their Data Submission. PG&E also provided a column in their Data Submission indicating which of their reported projects met either of these two criteria.

PG&E also noted that they removed the following data from their Data Submission:

- **Streetlights** per a joint agreement with the other IOUs
- **Rule 13** jobs, which are classified as temporary service work
- **Rule 20** jobs, which are primarily classified under internal orders

SCE noted in their Narrative Report that the outliers removed from the tariff data had either negative or blank cost information, as well as missing or erroneous Step 1-8 start and stop dates. Outliers removed from the MPU data included erroneous cost estimates at the time of design and inconclusive or incoherent data on MPU completion timing. SCE did not specify the criteria used to determine this information. They did not include outliers in their aggregate calculations and removed them from their data submission.

SDG&E included all projects in their Submission but noted outlier data was removed from their aggregate calculations. They did not provide an additional column in their Data Submission indicating which projects were flagged as outliers.

SDG&E used the following criteria for identifying outliers:

- Those with explicitly inaccurate dates, such as "1/1/9999," "01/01/2001," or "1/1/2031"
- Those with negative timelines

- Those including dates in Steps 1-7, that were later than the energization date in Step 8
- Projects with incomplete status verification, i.e., marked as “complete” but missing construction or energization dates
- Projects with durations exceeding two standard deviations above the energized job population average by tariff type

Finally, **the IOUs’ approach to including or excluding outliers in their IOU Submissions was inconsistent:** PG&E included and flagged outliers in its Data Submission, SDG&E included outliers in its Data Submission but did not flag which projects were outliers, and SCE excluded outliers entirely.

3.2.5 Main Panel Upgrade Data

The IOU submissions associated with MPU data comprised 20 data points compared to the 90 required for tariff data. The IOUs were unable to provide consistent, complete data for MPUs across all 20 data points. The IOUs acknowledged the gaps in MPU data within their Narrative Reports.

PG&E explained that data gaps in most required reportable fields result from its annual blanket order, which makes it difficult to delineate the required energization step structure and the notification structure used to track MPUs. PG&E noted future reporting will include a more accurate timeline with detailed step-by-step information for the Customer, PG&E, and, when applicable, agency/permitting time.

SCE identified 12 data points with missing data. They indicated the Customer Desired Energization Date depended on the launch of the BRPPP, which was available in the March 2026 BER. The five cost-specific data points SCE did not provide were deemed not applicable to MPU reporting. The remaining seven data points are not currently tracked by SCE’s systems of record, and their estimated reporting date is unknown.

SDG&E noted that large amounts of MPU-specific end-to-end cycle and costing-component data are unknown and unavailable. They estimated that the system enhancement projects to fill five data gaps in from their MPU data would take 12 months to complete.

3.3 Future Reporting Enhancements

While the IOUs made great efforts to qualify data in their submissions as challenging, the IOUs identified their improved reporting in their Narrative Reports, described in Table 10. When discussing initiatives and system enhancements for data collection, particularly IT-related initiatives, SDG&E emphasized the need for funding, noting that many of those initiatives were not included in their most recent General Rate Case.

Table 10. IOU Initiatives and Enhancements for Data Collection

IOU	Initiative/Enhancement	Description	Timeline
PG&E	Customer Request Tracking System	Tracking system for customer-requested scope/design change and delays	Estimated Launch by April 2026
	Load-Limit Letters Querying	Ability to query data for load-limit letters to inform required data points on flexible service options and unserved applicant-requested load at the time of energization	Estimated Launch by April 2026
	Application Field Enhancement	Updates to the "Application Cancellation Reason" field on application cancellations to pull from a more complete rejection cause list	Estimated Launch by April 2026
	Salesforce Enhancements	Added fields and logic for Customer and IOU Readiness dates, subtask checklists, phase timeline data points, and improved display/calculations	Launched March 2025
	Data and Process Automation	Continued investment in analytics and automation to streamline energization workflow and reduce manual effort	Launched (date not specified)
	Data-Driven Project Management	Introduction of enhanced dashboards to improve forecasting and tracking capabilities	Future Enhancement (date not specified)
	Customer Portal Evolution and Building and Renovation Service Center (BRSC)	Streamlining of user experience through site revamps, clearer definitions of user roles and responsibilities, and more self-service tools	Future Enhancement (date not specified)
SCE	Building, Renovation, and Project Planning Portal (BRPPP)	Customer portal intended to streamline customer energization process while providing enhancements that allow SCE to improve data-tracking capabilities and improve data accuracy, particularly for Step 1 – Customer Intake	Launched July 2025
	Data-Tracking System	Collaborating with NextGen Enterprise Resource Planning to establish a long-term solution addressing data requirements, while exploring the implementation of SAP Business Technology Platform as a near-term solution	Estimated Launch by June 2026
SDG&E	Builder-Service Portal (BSP)	Redesigned the customer-application process to provide a guided, step-by-step experience that aligns with the requirements of the Decision	Estimated Launch by March 2026
	Automated AI-powered Intake Coordinator Agent	AI agent designed with basic intake processing tasks, such as validating initial inputs and routing applications appropriately	Future Enhancement (date not specified)

Additionally, the IOUs described their efforts to address the overall challenges of energization. PG&E has launched a series of enhancements associated with customer communication automation, application intake improvements, customer experience tools, training and job aids, stakeholder engagement, and reporting. They also identified future enhancements such as

improved customer communications through expanded multilingual resources and a Pre-Project Planning Tool to provide for greater visibility and support during the early stages of an energization project.

SCE has enhanced its customer outreach by publishing the *Energization Process Steps and Processing Timing* document in January 2025, followed by the *Energization Timelines Customer Journey Map* and *Energization Timelines Customer Fact Sheet* in July 2025.[18,19,20] SCE has also launched process-improvement initiatives to eliminate eliminating outdated or redundant tasks, with a completion target set for November 2025.

SDG&E has held 75 listening sessions with external stakeholders and has received over 450 survey responses from stakeholders who recently completed energization projects to develop action plans aligned with the Decision's compliance requirements. They note primary improvements, including implementing a single point of contact and reducing manual steps and handoffs in the energization process.

4. Interim Analysis

Guidehouse conducted an interim analysis of IOU performance against energization targets, assessing performance for tariff and MPU projects, as well as performance across ESJ community types. The analysis included only projects marked as "Completed" in the IOU September 2025 Data Submissions.

As described in Section 2.4, Guidehouse determined that the IOUs' reported data were insufficient to assess the IOUs' progress towards meeting the average and maximum targets established by the Decision. As such, the analysis performed in this section **does not constitute a final determination of IOU performance meeting the established energization targets.**

4.1 Data Standardization

Before conducting the analysis, Guidehouse standardized data fields and inputs to support consistent comparison across IOUs. This included resolving differences in data fields naming and applying consistent values–such as "Not Provided" for blanks or unknown entries, and N/A in field which were "Not Applicable".

All three IOUs handled outliers differently, so Guidehouse applied adjustments based on the IOU's approach:

- **PG&E** flagged outliers in its tariff dataset, which Guidehouse subsequently removed. No outliers were identified or removed from MPU data.

[18] Energization Process Steps and Processing Timing. SCE.

[19] Energization Timelines Customer Journey map. SCE.

[20] Energization Timelines Customer Fact Sheet. SCE.

- **SCE** reported removing outliers from its dataset; therefore, Guidehouse did not apply additional outlier removal for tariff and MPU data.
- **SDG&E** neither removed nor flagged outliers; Guidehouse followed the outlier methodology described in SDG&E's report as closely as possible.

The data standardization process enabled Guidehouse to complete an interim analysis of IOU performance against energization targets by tariff, MPU, and ESJ community type.

4.2 Tariff Performance Trends

Guidehouse assessed performance across tariff projects, encompassing both IOU and customer-controlled steps. An overview of the analysis appears in Table 11. Subsequent sections summarize analyses of performance by tariff, business class, and responsible party. As noted, due to insufficient data, analysis in this section does not constitute a final determination of IOU performance meeting the established energization targets.

Table 11. Performance Summary Based on Guidehouse Analysis

Analysis	Parameter	PG&E	SCE	SDG&E
All-Project Average Timeline (Calendar Days)	IOU-Controlled	118	156	58
	Customer-Controlled	130	69	96
	End-to-End Cycle	328	224	154
Performance Against Targets (% of Completed Projects)	Meeting Target Average	87%	67%	95%
	Less than Target Maximum	98%	86%	98%
End-to-End Cycle Timeline Comparison	Customer Design and/or Installation	25 to 62% longer than all-project average	91 to 240% longer than all-project average	293% longer than all-project average
	Commercial	36% longer than all-project average	77% longer than all-project average	12% longer than all-project average
	Residential	6% faster than all-project average	12% faster than all-project average	2% faster than all-project average

Note: This analysis does not constitute a final determination of IOU performance meeting the established energization targets.

4.2.1 Performance by Tariff

As shown in Table 12 below, most PG&E projects meet the Decision's target average and maximum timelines for Rule 16 and Rule 29/45 projects. SCE and SDG&E were less successful at meeting the target average and maximum outside of Rule 16 (service-line extensions), though the analysis included projects initiated before the Decision.

Most tariff projects fall under Rule 16 and typically have shorter timelines because Rule 16 covers only service-line extensions to individual customers, requiring less complex infrastructure upgrades than Rule 15 (distribution-line service extensions) or Rule 29/45 (electric vehicle charging infrastructure). As a result, the IOUs saw a higher percentage of Rule 16 projects meeting the target average and maximum than in other tariffs. Variations by tariff type suggest that project complexity is a significant driver of whether IOUs meet the Decision's targets.

For Rule 15/16 combination projects, PG&E achieved the target average on 87% of its projects, whereas SCE reached this benchmark only 37% of the time, and SDG&E just 26%. These differences among IOUs indicate that variations in their tariff processes contribute to the differing rates of success in meeting the target averages.

Table 12. Calendar Day Targets by Utility and Tariff

Utility	Tariff	Completed Projects	Target Average (Days)	Average Days of Completed Projects	Target Average (% of Projects)	Target Maximum (Days)	Target Maximum (% of Projects)
PG&E	R15[21]	0	182	No Data Provided	No Data Provided	357	No Data Provided
PG&E	R16	6,718	182	118	86.5%	335	98.1%
PG&E	R29/45	86	182	113	89.5%	335	97.7%
PG&E	Combo (R15 & R16)	2,119	182	117	87.2%	306	97.8%
PG&E	Combo (R15 & R29/45)[22]	0	182	No Data Provided	No Data Provided	306	No Data Provided
SCE	R15	117	182	423	4.3%	357	29.1%
SCE	R16	5,869	182	131	73.7%	335	90.2%
SCE	R29/45	17	182	350	11.8%	335	52.9%
SCE	Combo (R15 & R16)	1,028	182	261	37.1%	306	67.4%
SCE	Combo (R15 & R29/45)	6	182	429	0.0%	306	0.0%
SDG&E	R15	300	182	240	41.3%	357	77.3%
SDG&E	R16	6,472	182	46	97.9%	335	99.9%
SDG&E	R29/45	15	182	515	0.0%	335	13.3%
SDG&E	Combo (R15 & R16)	57	182	311	26.3%	306	43.9%

[21] PG&E does not have any Rule 15 projects to report, and noted that these jobs are uncommon.
[22] PG&E does not have any R15 & R29/R45 projects to report, and noted those jobs are uncommon.

Utility	Tariff	Completed Projects	Target Average (Days)	Average Days of Completed Projects	Target Average (% of Projects)	Target Maximum (Days)	Target Maximum (% of Projects)
SDG&E	Combo (R15 & R29/45)	6	182	505	0.0%	306	0.0%

Note: This analysis does not constitute a final determination of IOU performance meeting the established energization targets.

4.2.2 Performance by Business Class

Guidehouse compared the average timeline in calendar days for all completed tariff projects to the average timeline in calendar days for completed projects by business class (Table 14) as defined in the Data Submission Template. IOUs regularly met the target average for residential projects, which represent the largest business class for SCE and SDG&E and the second largest business class for PG&E. PG&E and SDG&E met the target average across all sectors by 85% or more. SCE struggled to meet the target average for commercial and agricultural projects. PG&E and SDG&E were also less successful at meeting the target average for commercial projects compared to residential projects, but by a small margin.

Table 13. Calendar Day Target by IOU and Business Class

Utility	Business Class	Number of Completed Projects	Target Average	Average of All Completed Projects	Target Average (% Projects)
PG&E	Residential	3,161	182	111	89%
PG&E	Relocation/ Rearrangement/ Upgrade	4,570	182	122	85%
PG&E	Commercial	692	182	121	85%
PG&E	Agricultural	500	182	121	87%
SCE	Residential	6,012	182	137	72%
SCE	Relocation/ Rearrangement/ Upgrade	0	182	No Data Provided	No Data Provided
SCE	Commercial	915	182	269	35%
SCE	Agricultural	110	182	206	47%
SDG&E	Residential	5,748	182	53	96%
SDG&E	Relocation/ Rearrangement/ Upgrade	0	182	No Data Provided	No Data Provided
SDG&E	Commercial	1,102	182	81	88%

Utility	Business Class	Number of Completed Projects	Target Average	Average of All Completed Projects	Target Average (% Projects)
SDG&E	Agricultural	0	182	No Data Provided	No Data Provided

Note: This analysis does not constitute a final determination of IOU performance meeting the established energization targets.

4.2.3 Performance by Responsible Party

Having assessed IOU performance by tariff and business class, Guidehouse next assessed performance by responsible party (customer-controlled and IOU-controlled) and by process step.

Projects where the customer took on responsibility for Design (Step 2), Installation (Step 7), or both experienced significantly longer timelines than to the overall average for Rule 15/Rule 16 projects. Increases ranged from 25% to nearly 290%, indicating that the amount of customer responsibility had a substantial impact on project duration.

Among these, projects where customers were responsible only for Design showed significant extensions in timeline compared to projects where customers were responsible only for installation. This suggests that design-related responsibilities contribute more to extended timelines than installation tasks.

In contrast, most projects were managed by IOUs for both design and installation, and they consistently achieved shorter timelines. The average duration for IOU-managed projects was slightly below the average timeline of all Rule 15/Rule 16 projects, with percentage differences ranging from -1% to -5%, demonstrating greater efficiency when IOUs retained full responsibility.

Table 14. Performance Comparison by Party Responsibility

Utility	Step	Responsible Party	Number of Completed Projects	Average - All R15/16 Projects	Average - By Party Responsible for Design & Install	Difference in Average from All Projects (%)
PG&E	Design	Applicant	30	326	529	62%
PG&E	Installation	Applicant	35	326	408	25%
PG&E	Both	Applicant	120	326	525	61%
PG&E	Both	IOU	8,738	326	324	-1%
SCE	Design	Applicant	76	222	607	173%
SCE	Installation	Applicant	44	222	424	91%
SCE	Both	Applicant	17	222	756	240%
SCE	Both	IOU	6,900	222	217	-2%

Utility	Step	Responsible Party	Number of Completed Projects	Average - All R15/16 Projects	Average - By Party Responsible for Design & Install	Difference in Average from All Projects (%)
SDG&E	Design	Applicant	155	152	596	293%
SDG&E	Installation	Applicant	0	152	No Data Provided	No Data Provided
SDG&E	Both	Applicant	0	152	No Data Provided	No Data Provided
SDG&E	Both	IOU	6,695	152	144	-5%

Note: This analysis does not constitute a final determination of IOU performance meeting the established energization targets.

4.2.4 Performance by Business Class: End-to-End Cycle

Guidehouse also assessed the end-to-end cycle performance by business class. Each business class was compared to the IOU's average end-to-end cycle timeline to identify which project types contribute most to overall cycle duration. Overall, IOU commercial projects consistently took longer than the overall project average. In contrast, residential projects, which account for most of the IOUs completed tariff projects, perform faster than the average. PG&E provided a unique category called Relocation/Rearrangement/Upgrade projects, which accounted for 51% of PG&E's projects and performed slightly above PG&E's overall average.[23]

[23] Full explanation from PG&E's narrative: "Additional Job Category 'Relocation/Rearrangement/Upgrade': We have included an additional job category within our report that is unique to PG&E. Due to the scope of work completed under this grouping, we did not want to exclude this category from the completed report. PG&E is working to refine this category and potentially include it as a subset of the standard IOU groupings for future reporting."

Table 15. Performance Comparison by Business Class

Utility	Business Class	Number of Completed Projects	Average - All Projects	Average - By Business Class	Difference in Average from All Projects (%)
PG&E	Residential	3,161	328	310	-6%
PG&E	Relocation/ Rearrangement/ Upgrade	4,570	328	321	-2.2%
PG&E	Commercial	692	328	447	36.2%
PG&E	Agricultural	500	328	346	5.3%
SCE	Residential	6,012	224	197	-12.3%
SCE	Relocation/ Rearrangement/ Upgrade	0	224	No Data Provided	No Data Provided
SCE	Commercial	915	224	396	76.8%
SCE	Agricultural	110	224	294	31.0%
SDG&E	Residential	5,748	154	151	-2.3%
SDG&E	Relocation/ Rearrangement/ Upgrade	0	154	No Data Provided	No Data Provided
SDG&E	Commercial	1,102	154	173	12.2%
SDG&E	Agricultural	0	154	No Data Provided	No Data Provided

Note: This analysis does not constitute a final determination of IOU performance meeting the established energization targets.

4.3 Main Panel Upgrade Performance Trends

In addition to tariff projects, Guidehouse assessed IOU performance against the Decision's MPU targets. Across all three IOUs, approximately half of all MPU projects failed to meet the adopted average target across all three IOUs. As noted, due to insufficient data, analysis in this section does not constitute a final determination of IOU performance meeting the established energization targets.

PG&E performed closest to the target, averaging a timeline of 40 business days compared to the 30-business-day target, and meeting the target average on 51% of projects. In contrast, SCE and SDG&E averaged 76 and 65 business days, respectively—more than twice the target—and met the target average on only 21% and 27% of projects. PG&E project timelines were under the

target maximum on over 50% of its MPUs, while SCE and SDG&E only came in under the target maximum 37% and 42% of the time, respectively.

Table 18. MPU Business Day Targets

Utility	Number of Completed MPUs	Target Average (Business Days)	Average of All Completed Projects	Target Average (% of projects)	Target Maximum (Business Days)	Target Maximum (% of projects)
PG&E	27,742	30	40	50.9%	45	71.9%
SCE	27,197	30	76	20.8%	45	37.6%
SDG&E	3,716	30	65	27.1%	45	42.7%

Note: This analysis does not constitute a final determination of IOU performance meeting the established energization targets.

As seen in Table 19 below, IOUs completed MPUs in non-ESJ Communities 4 to 8% faster than their all-project average. Tribal Communities show mixed results: SDG&E achieved the largest reduction, completing MPUs 43% faster than its average, while PG&E and SCE recorded the longest timelines for this group. However, Tribal Community projects represent less than 0.5% of the total MPUs across the IOUs. Overall, average project times for MPUs varied greatly by community type, for all IOUs.

Table 19. MPU Performance Comparison by Community Type

Utility	Underserved Community	Number of Completed MPUs	Average - All Projects (Business Days)	Average - By Underserved Community (Business Days)	Difference in Average from All Projects (%)
PG&E	Non-ESJ Community	17,033	40	38	-4%
PG&E	Underserved Community	4,439	40	45	13%
PG&E	Disadvantaged Community	6,264	40	40	2%
PG&E	Tribal Community	6	40	54	34%
SCE	Non-ESJ Community	13,911	76	72	-5%
SCE	Underserved Community	6,980	76	75	0%
SCE	Disadvantaged Community	5,997	76	84	11%
SCE	Tribal Community	309	76	94	24%

Utility	Underserved Community	Number of Completed MPUs	Average - All Projects (Business Days)	Average - By Underserved Community (Business Days)	Difference in Average from All Projects (%)
SDG&E	Non-ESJ Community	1,575	65	59	-8%
SDG&E	Underserved Community	2,036	65	69	7%
SDG&E	Disadvantaged Community	102	65	56	-13%
SDG&E	Tribal Community	3	65	37	-43%

Note: This analysis does not constitute a final determination of IOU performance meeting the established energization targets.

4.4 Environmental and Social Justice Considerations

Guidehouse assessed performance by ESJ requirements as specified in the Decision. As noted, due to insufficient data, analysis in this section does not constitute a final determination of IOU performance meeting the established energization targets.

4.4.1 Performance by Environmental Social Justice Target

Having assessed tariff and MPU performance, Guidehouse next examined whether the energization outcomes varied across ESJ community types, as specified in the Decision.

PG&E and SDG&E met the target average for more than 80% of projects across community types, while SCE lagged with rates between 55% to 73%. PG&E performed strongly in Disadvantaged and Underserved Communities, meeting the target range of 84% to 90% on average. SDG&E had the highest percentage of projects that met the target average in Disadvantaged and Underserved Communities, 92% to 94% respectively.

Across all three service territories, the IOUs have completed only 78 projects within Tribal Communities, representing less than 1% of their total energization projects. Of these 78 projects located in Tribal Communities, the IOUs met the average energization timing target 55% to 84% of the time; however, given the small sample size, these percentages may not be representative of broader performance trends in Tribal Communities.

Several factors led to the variance in average timelines in Table 16 and Table 17 across utilities and the community, such as additional requirements for certain communities, project type, project complexity, and areas with higher concentrations of quick or lengthy projects, which can skew the averages. The analysis does not imply that IOUs are giving preferential treatment to customers of a specific community type.

A key challenge in this analysis was standardizing the IOU-provided data for Community Type. PG&E associated each project in their Data Submission with a unique ESJ Community Type;

however, SCE and SDG&E identified some projects as being in multiple ESJ Communities, such as DAC and Underserved or DAC, Underserved, and Tribal. Guidehouse's approach to standardization assumed a hierarchy where:

1. If a project is in a Tribal Community, it is considered to have a "Tribal Community" Community Type, e.g., a project that is in a DAC, Underserved, and Tribal Community is assigned the "Tribal Community" Community Type.
2. If a project is in an Underserved Community but not a Tribal Community, it is considered to have an "Underserved Community" Community Type, e.g., a project located in a DAC and Underserved Community is assigned the "Underserved Community" Community Type.
3. If a project is in a DAC exclusively, it is assigned a "DAC" Community Type

This hierarchy supported a standardized comparison across the IOUs, though it may obscure performance differences for projects that fall into multiple categories.

Table 16. Calendar Day Targets by Community Type

Utility	Community Type	Completed Projects	Target Average	Average of All Completed Projects	Target Average (% project)
PG&E	Non-ESJ Community	4,694	182	119	86%
PG&E	Disadvantaged Community	2,791	182	113	90%
PG&E	Underserved Community	1,419	182	126	84%
PG&E	Tribal Community	19	182	115	84%
SCE	Non-ESJ Community	3,200	182	175	62%
SCE	Disadvantaged Community	1,918	182	133	73%
SCE	Underserved Community	1,886	182	144	70%
SCE	Tribal Community	33	182	185	55%
SDG&E	Non-ESJ Community	2,455	182	53	95%
SDG&E	Disadvantaged Community	477	182	66	92%
SDG&E	Underserved Community	3,892	182	59	94%

Utility	Community Type	Completed Projects	Target Average	Average of All Completed Projects	Target Average (% project)
SDG&E	Tribal Community	26	182	131	81%

Note: This analysis does not constitute a final determination of IOU performance meeting the established energization targets.

4.4.2 Performance by Environmental Social Justice Target – End-to-End Cycle

Like calendar-day targets, end-to-end cycle timelines for Disadvantaged Communities performed better than the overall average for PG&E and SCE, with PG&E completing projects 5% faster and SCE 12% faster. In contrast, SDG&E's Disadvantaged Community projects ranked second longest among its community types. Non-ESJ Community projects make up the majority of each IOU's portfolio, but performance varies: PG&E and SCE were slower than their respective averages, while SDG&E performed slightly better.

Table 17. Performance Comparison by Community Type

Utility	Community Type	Number of Completed Projects	Average - All Projects	Average - By Community Type	Difference in Average from All Projects (%)
PG&E	Non-ESJ Community	4,694	328	336	2%
PG&E	Disadvantaged Community	2,791	328	312	-4.9%
PG&E	Underserved Community	1,419	328	335	2.0%
PG&E	Tribal Community	19	328	331	0.8%
SCE	Non-ESJ Community	3,200	224	248	10.7%
SCE	Disadvantaged Community	1,918	224	197	-12.0%
SCE	Underserved Community	1,886	224	210	-6.4%
SCE	Tribal Community	33	224	286	27.6%
SDG&E	Non-ESJ Community	2,455	154	152	-1.3%
SDG&E	Disadvantaged Community	477	154	175	13.4%
SDG&E	Underserved Community	3,892	154	152	-1.2%
SDG&E	Tribal Community	26	154	242	56.9%

Note: This analysis does not constitute a final determination of IOU performance meeting the established energization targets.

Appendix A. Data Availability by Data Field

Table 20 below only relates to the data availability component of the data sufficiency assessment.

Table 20. Data Sufficiency Assessment for Data Fields (% of Projects with Data Available)

Index Category	Index	PG&E	SCE	SDG&E
Preliminary Project Information	• Tariff • Applicant or IOU design • Business class (requested end user) • City project is located in • Community type	100%	100%	100%
	Overhead or underground	89%	100%	100%
	AHJ (Authority Having Jurisdiction) for permitting based on project's location	67%	0%	100%
Site Capacity and Capacity Requested	Total site capacity at time of customer's application for service (kW)	0%	0%	41%
	Total site capacity requested (kW)	85%	0%	41%
	Capacity request category: <1MW, 1MW to 2MW, >2MW	85%	0%	97%
Upstream Capacity	Project triggered for upstream capacity project (Yes/No)	100%	0%	100%
Customer Desired Energization Date vs. Final Energization Date	Customer desired energization date (Date)	100%	0%	100%
	Difference between customer desired energization date and final energization date (Calendar Days)	66%	0%	100%
Tariff Upgrade	Date when need for R15/16/29/45 upgrade identified (Date)	0%	100%	100%
	Date when planning work started R15/16/29/45 upgrade (Date)	99%	100%	99%

Index Category	Index	PG&E	SCE	SDG&E
	Date when construction work started R15/16/29/45 upgrade (Date)	99%	100%	79%
Customer Elect and Customer Project Delay	For R15/16 tariffs, the customer elects to take on the typical IOU-completed scope and vice versa. (i.e., applicant design or applicant install) (N/A, Customer Elected Applicant Design/Install/Both)	100%	100%	100%
	For R15/R16 tariffs, delay due to a customer-requested change in design or a change in project scope (Yes, No)	100%	0%	100%
	For R15/R16 tariffs, the time the project was delayed due to a customer-requested change in design or a change in project scope (Calendar Days)	0%	0%	100%
Costing Component	Total cost ($) to complete all energization requests	100%	100%	95%
	Total staffing, labor, and material cost ($ - Capital and Expense)	100%	100%	79%
	Project costs ($) for all IOU equipment for upstream capacity projects: Electric Rule 15, Electric Rule 16, and Electric Rule 29/45	0%	0%	18%
	Project costs ($) for anything else IOU covers	100%	100%	37%
	Total construction and overhead costs ($)	100%	100%	95%
	Customer allowance ($)	88%	100%	58%
	Estimated costs ($) at time of design	100%	100%	100%
	Actual costs ($) at time of energization	100%	100%	95%
	Difference of estimated and actual costs at time of energization ($)	100%	100%	95%
Eight Energization Step Dates	Step 1 – Intake Start Date	100%	100%	100%
	Step 1 – Intake End Date	99%	100%	100%
	Step 2 – Engineering & Design Start Date	99%	100%	100%

Index Category	Index	PG&E	SCE	SDG&E
	Step 2 – Engineering & Design End Date	100%	100%	77%
	Step 3 – Customer Dependencies Start Date	90%	100%	66%
	Step 3 – Customer Dependencies End Date	90%	100%	11%
	Step 4 – IOU Dependencies Start Date	100%	100%	17%
	Step 4 – IOU Dependencies End Date	99%	100%	17%
	Step 5 – Customer Site Readiness Start Date	100%	100%	91%
	Step 5 – Customer Site Readiness End Date	100%	100%	67%
	Step 6 – IOU Site Readiness Start Date	6%	100%	4%
	Step 6 – IOU Site Readiness End Date	6%	100%	27%
	Step 7 – Construction Start Date	100%	100%	79%
	Step 7 – Construction End Date	100%	100%	100%
	Step 8 – Energization Start Date	100%	100%	100%
	Step 8 – Energization End Date	47%	100%	100%
Concurrent Steps	Energization steps completed concurrently	100%	0%	100%
	Total time for energization steps completed concurrently (Calendar Days)	100%	0%	100%
Meeting/Exceeding Energization Targets	R15/R16/R29/R45 energization reasoning why average/Maximum energization target exceeded	2%	0%	0%

Key: % represents the number of projects with available data; Key: Green: >=90%, Orange: 25-90%, Red: <25%

(END ATTACHMENT B)