



COM/CHG/vj4 6/26/2026

FILED

06/26/26

11:57 AM

A2406001

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas & Electric Company (U 902-E) for Approval of: (i) Contract Administration, Least-Cost Dispatch and Power Procurement Activities in 2023, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account, Portfolio Allocation Balancing Account, Power Charge Indifference Adjustment Undercollection Balancing Account, Transition Cost Balancing Account, Local Generating Balancing Account, and Modified Cost Allocation Mechanism Balancing Account in 2023, and (iii) Costs Recorded in Related Regulatory Accounts in 2023.

Application 24-06-001

ASSIGNED COMMISSIONER'S AMENDED SCOPING MEMO AND RULING

This Amended Scoping Memo and Ruling (Second Scoping Memo) sets forth the issues, need for hearing, schedule, category, and other matters necessary to scope this proceeding pursuant to Public Utilities Code Section 1701.1 and Article 7 of the Commission's Rules of Practice and Procedure (Rules).

This Second Scoping Memo revises and clarifies the sole remaining issue scoped into the instant proceeding and authorizes parties to file supplemental testimony to build the proceeding record for the sole remaining scoped issue. This ruling also directs San Diego Gas & Electric Company (SDG&E) to respond to certain questions regarding historical participation in its Green Tariff and Shared Renewables (GTSR) program.

SDG&E shall, and other parties may, file Supplemental Testimony by July 10, 2026 and Supplemental Rebuttal Testimony by July 17, 2026.¹ Parties are further directed to meet and confer and shall jointly file, concurrently with Supplemental Rebuttal Testimony, a status update identifying and describing any contested material issues of fact. The joint filing shall also identify any parties that request an Evidentiary Hearing or request opportunity to file briefs and contain a justification for that request.

All parties may file Opening Briefs by July 24, 2026 and Reply Briefs by July 31, 2026. This ruling includes a list of questions that the Commission intends to ask parties to address in their Opening Briefs; I or the assigned Administrative Law Judge (ALJ) may amend these questions or the proceeding schedule as necessary.

1. Procedural Background

On June 3, 2024, San Diego Gas & Electric Company (SDG&E) filed Application (A.) 24-06-001 seeking Commission review and approval of its contract administration, least-cost dispatch and power procurement activities in 2023 as well as certain costs related to those activities recorded within multiple memorandum and balancing accounts.

On May 5, 2026, the Commission issued Decision (D.) 26-04-029 which resolved all of the scoped issues within this proceeding except for the question of how to allocate the unrecovered costs that SDG&E incurred to develop and implement its GTSR program. On that topic, D.26-04-029 stated that “there is insufficient record for the Commission to determine which source or sources should be responsible for the outstanding GTSR costs.” Accordingly, the only

¹ This Second Scoping Memo requires SDG&E to file Opening Testimony that includes responses to certain questions.

remaining issue for consideration within this proceeding is “[whether] the Commission should authorize SDG&E to recover the under-collected amounts in its Green Tariff Shared Renewables-related balancing accounts, and if so, from whom those costs should be recovered.” The purpose of this Second Amended Scoping Memo and Ruling is to revise the sole remaining scoped issue and to gather sufficient record for the Commission to decide on how the outstanding GTSR costs should be allocated.

2. Issues Before the Commission

The only remaining issue for consideration within this proceeding is “[whether] the Commission should authorize SDG&E to recover the under-collected amounts in its Green Tariff Shared Renewables-related balancing accounts, and if so, from whom those costs should be recovered.” The proceeding record, however, indicates that some of the outstanding GTSR costs were recorded to memorandum accounts. Accordingly, this ruling updates the sole remaining scoped issue to read as follows:

11. Whether the Commission should authorize SDG&E to recover the under-collected amounts in its Green Tariff Shared Renewables-related memorandum accounts and balancing accounts, and if so, from whom those costs should be recovered.

3. Need for Evidentiary Hearing

Parties have not currently identified disputed issues of material fact but such issues may arise during the course of the proceeding. Accordingly, the schedule includes a deadline by which parties must file a joint case management statement indicating whether the parties believe an evidentiary hearing is necessary, providing an update on settlement discussions, identifying any contested material issues of fact, witness lists, and a proposed schedule for cross-

examination. The assigned ALJ will review the filing and issue a ruling determining whether to hold an evidentiary hearing.

4. GTSR Data SDG&E Must Produce for Supplemental Testimony

SDG&E shall file and serve Supplemental Testimony that responds to the questions and prompts below. SDG&E may contact the Commission's Energy Division for clarifications about these requests.

1. Provide the data necessary to complete the template in Appendix A (attached).
 - a. If SDG&E is unable to complete Appendix A, provide a detailed explanation for why it cannot.
 - b. If SDG&E is unable to complete Appendix A, explain how SDG&E could have complied with the statutory requirement not to shift GTSR costs onto non-participants.
2. Options for Collecting Outstanding GTSR Costs from Former Participants.
 - a. If all the outstanding GTSR costs were allocated evenly to all former GTSR participants, how much money would SDG&E need to collect from each former participant? Provide the mean, median and a range.
 - b. If all the outstanding GTSR costs attributable to all former GTSR participants were allocated in proportion to those customers' total electricity consumption while they were enrolled in GTSR, what would be the costs required to be collected from residential customers? From non-residential customers? Provide the mean, median and a range for residential and non-residential customers.
 - c. Are there other reasonable methodologies to allocate outstanding GTSR costs? If so, explain why, and provide the mean, median and a range of costs that would be collected from residential customers and from non-residential customers.

3. Describe in detail how SDG&E would implement a Commission order to allocate all or a portion of the outstanding GTSR costs to former GTSR participants.
 - a. Does SDG&E have the data and capability to perform the allocation methodologies described in Question 2? If not, explain why in detail.
 - b. What number and fraction of the former GTSR participants no longer have an active customer account with SDG&E?
 - c. How would SDG&E identify, locate, and collect money from former GTSR participants that no longer have an active customer account with SDG&E? How much time would this process take? What costs would SDG&E incur in the process? Would SDG&E seek to record any of these costs to GTSR balancing or memorandum accounts or to another location?
4. Describe the criteria SDG&E uses to determine whether to designate costs as uncollectible.

5. Questions for Parties to Address in Opening Briefs

This section includes a preliminary list of questions that the Commission intends to ask parties to address in their Opening Briefs; I or the assigned Administrative Law Judge (ALJ) may amend these questions or the proceeding schedule as necessary.

1. Public Utilities Code Section 2833(q) states that the Commission “shall ensure that charges and credits associated with a participating utility’s green tariff shared renewables program are set in a manner that ensures nonparticipant ratepayer indifference for the remaining bundled service, direct access, and community choice aggregation customers and ensures that no costs are shifted from participating customers to nonparticipating ratepayers.”

- a. How, if at all, could SDG&E demonstrate that it cannot collect the outstanding GTSR costs from some or all of the former GTSR participants?
 - b. If SDG&E demonstrates that it cannot collect the outstanding GTSR costs from some or all of the former GTSR participants, should the Commission authorize SDG&E to designate the outstanding GTSR costs as uncollectible?
2. How should the Commission determine the portion of outstanding GTSR costs that the Commission should assign to SDG&E's shareholders? The Joint Community Choice Aggregators argue that SDG&E did not prudently manage its GTSR program.
 - a. Did SDG&E unreasonably delay the recovery of outstanding GTSR costs? If so, in response, what portion of the outstanding GTSR costs is it appropriate for the Commission to assign to SDG&E shareholders? Why? Is there precedent for the Commission disallowing costs or assigning monetary penalties for delayed filings?
 - b. Did SDG&E, either through action or inaction, otherwise imprudently manage its GTSR program? If so, in response, what portion of the outstanding GTSR costs is it appropriate for the Commission to assign to SDG&E shareholders? Why? Is there precedent for the Commission disallowing cost recovery for similar action or inaction?
 - c. How should the Commission determine cost responsibility for any administrative costs reasonably incurred by SDG&E as a result of collecting GTSR outstanding costs from former participants?
 - d. Are the outstanding administrative and outreach costs recorded in the GTSR memorandum accounts reasonable? Why?
3. What portion of the outstanding GTSR costs should the Commission direct SDG&E to recover from all its

distribution customers, from former participants, from shareholders, and/or designate as uncollectible? Why?

- a. If SDG&E demonstrates that it could collect the outstanding costs from some or all former GTSR participants, does statute permit the Commission to order SDG&E to do so?
- b. If the Commission determines that SDG&E reasonably incurred some or all of the outstanding GTSR costs, does statute only allow for the Commission to assign the outstanding GTSR costs to SDG&E's shareholders?

6. Schedule

The following schedule is adopted here and may be modified by the Administrative Law Judge (ALJ) as required to promote the efficient and fair resolution of the application:

Event	Date
Supplemental Testimony	July 10, 2026
Supplemental Rebuttal Testimony	July 17, 2026
Rule 13.9 Meet and Confer Deadline by which parties must file a joint case management statement indicating whether the parties believe an evidentiary hearing is necessary, providing an update on settlement discussions, identifying any contested material issues of fact, witness lists, a proposed schedule for cross-examination, and a proposed date or dates and schedule for the evidentiary hearing	July 17, 2026
Evidentiary hearing (if necessary)	TBD
If evidentiary hearing not requested, date by which parties must submit joint statement moving to admit evidence into testimony, noting and explaining any parties' objections	July 17, 2026
Opening Briefs	July 24, 2026

Reply Briefs <i>[matter submitted]</i>	July 31, 2026
Proposed Decision (PD)	Q3 2026
Comments on PD	Two weeks after PD
Replies to Comments on PD	One week after comments
Commission decision	No sooner than 30 days after PD

The proceeding will stand submitted upon the filing of reply briefs unless the ALJ requires further evidence or argument. Based on this schedule, the proceeding will be resolved before the statutory deadline.

7. Alternative Dispute Resolution (ADR) Program and Settlements

The Commission’s Alternative Dispute Resolution (ADR) program offers mediation, early neutral evaluation, and facilitation services, and uses ALJs who have been trained as neutrals. At the parties’ request, the assigned ALJ can refer this proceeding to the Commission’s ADR Coordinator. Additional ADR information is available on the Commission’s website.²

Any settlement between parties, whether regarding all or some of the issues, shall comply with Article 12 of the Rules and shall be served in writing. Such settlements shall include a complete explanation of the settlement and a complete explanation of why it is reasonable in light of the whole record, consistent with the law and in the public interest. The proposing parties bear the burden of proof as to whether the settlement should be adopted by the Commission.

The schedule set forth in this Scoping Memo includes a date for the completion of settlement talks. No later than this date, the parties will submit to

² See D.07-05-062, Appendix A, § IV.O.

the assigned ALJ a status report of their efforts, identifying agreements reached and unresolved issues requiring hearing. Any settlements between parties, whether regarding all or some of the issues, shall comply with Article 12 of the Rules and shall be served in writing. Such settlements shall include a complete explanation of the settlement and a complete explanation of why it is reasonable in light of the whole record, consistent with the law, and in the public interest. The proposing parties bear the burden of proof as to whether the settlement should be adopted by the Commission.

8. Category of Proceeding and Ex Parte Restrictions

This ruling confirms the Commission's preliminary determination³ that this is a ratesetting proceeding. Accordingly, ex parte communications are restricted and must be reported pursuant to Article 8 of the Rules.

9. Public Outreach

Pursuant to Public Utilities Code Section 1711(a), where feasible and appropriate, before determining the scope of the proceeding, the Commission sought the participation of those likely to be affected, including those likely to derive benefit from, and those potentially subject to, a decision in this proceeding. This matter was noticed on the Commission's daily calendar. Where feasible and appropriate, this matter was incorporated into engagements conducted by the Commission's External Affairs Division with local governments and other interested parties.

10. Intervenor Compensation

Pursuant to Public Utilities Code Section 1804(a)(1), a customer who intends to seek an award of compensation must file and serve a notice of intent

³ Resolution ALJ 176-3547 at page 2.

to claim compensation within 30 days of the issuance of this Second Scoping Memo.

11. Response to Public Comments

Parties may, but are not required to, respond to written comments received from the public. Parties may do so by posting such response using the “Add Public Comment” button on the “Public Comment” tab of the online docket card for the proceeding.

12. Public Advisor

Any person interested in participating in this proceeding who is unfamiliar with the Commission’s procedures or has questions about the electronic filing procedures is encouraged to obtain more information at <http://cpuc.ca.gov/pao> or contact the Commission’s Public Advisor at 866-849-8390 or send an e-mail to public.advisor@cpuc.ca.gov.

13. Filing, Service, and Service List

The official service list has been created and is on the Commission’s website. Parties should confirm that their information on the service list is correct and serve notice of any errors on the Commission’s Process office, the service list, and the ALJ. Persons may become a party pursuant to Rule 1.4.⁴

When serving any document, each party must ensure that it is using the current official service list on the Commission’s website.

This proceeding will follow the electronic service protocol set forth in Rule 1.10. All parties to this proceeding shall serve documents and pleadings using

⁴ The form to request additions and changes to the Service list may be found at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/administrative-law-judge-division/documents/additiontoservicelisttranscriptordercompliant.pdf>

electronic mail, whenever possible, transmitted no later than 5:00 p.m., on the date scheduled for service to occur.

When serving documents on Commissioners or their personal advisors, whether or not they are on the official service list, parties must only provide electronic service. Parties must not send hard copies of documents to Commissioners or their personal advisors unless specifically instructed to do so.

Persons who are not parties but wish to receive electronic service of documents filed in the proceeding may contact the Process Office at process_office@cpuc.ca.gov to request addition to the “Information Only” category of the official service list pursuant to Rule 1.9(f).

The Commission encourages those who seek information-only status on the service list to consider the Commission’s subscription service as an alternative. The subscription service sends individual notifications to each subscriber of formal e-filings tendered and accepted by the Commission. Notices sent through subscription service are less likely to be flagged by spam or other filters. Notifications can be for a specific proceeding, a range of documents and daily or weekly digests.

14. Receiving Electronic Service from the Commission

Parties and other persons on the service list are advised that it is the responsibility of each person or entity on the service list for Commission proceedings to ensure their ability to receive emails from the Commission. Please add “@cpuc.ca.gov” to your email safe sender list and update your email screening practices, settings and filters to ensure receipt of emails from the Commission.

15. Assignment of Proceeding

Christine Harada is the assigned commissioner and Andrew Dugowson is the assigned ALJ and presiding officer for the proceeding.

IT IS RULED that:

1. The scope of this proceeding is described above and is adopted.
2. The schedule of this proceeding is set forth above and is adopted.
3. An evidentiary hearing is needed if the Commission holds an evidentiary hearing in this proceeding that involves the issues scoped into this amended scoping memo.
4. The presiding officer is Administrative Law Judge Andrew Dugowson.
5. The category of the proceeding is ratesetting.

Dated June 26, 2026, at San Francisco, California.

/s/ CHRISTINE HARADA

Christine Harada
Assigned Commissioner

Appendix A - Template for SDG&E to Complete

	Customer Class	Date Enrolled in GTSR	Date Unenrolled from GTSR	Total Energy Consumption While Enrolled in GTSR⁵	Whether SDG&E Has Current Contact information for the Customer	If SDG&E Does Not Have Current Contact Information, Whether SDG&E Can Obtain It
Anonymized unique identifier						

⁵ This field should be the sum of the applicable customers’ total energy usage while they were enrolled in the GTSR program; these totals should not be converted to “average monthly consumption.” If, for example, the group only had two customers, one of whom was enrolled in GTSR for two months and consumed a total of 100 kWh while the second was enrolled in GTSR for five months and consumed a total of 120 kWh, the proper entry for this field would be 220 kWh.

A.24-06-001 COM/CHG/vj4

(ATTACHMENT A)

(END ATTACHMENT A)