

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



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Application of San Diego Gas & Electric
Company (U 902 M) for Approval of Smart
Meter 2.0 Proposal

Application 25-12-012
(Filed December 18th, 2025)

**MISSION:DATA COALITION'S RESPONSE TO
PUBLIC ADVOCATES' MOTION TO CONSOLIDATE**

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On behalf of Mission:data Coalition

August 4, 2026

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On July 20, 2026, the Public Advocates Office at the Commission (Cal Advocates) filed a motion for consolidation of the Test Year 2028 General Rate Case (TY 2028 GRC) submitted by Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) (collectively, Sempra) with SoCalGas and SDG&E’s individual applications for Advanced Meter Infrastructure (AMI) upgrades (A.25-12-012 and A.25-12-019, respectively) and Sempra’s SAP Migration Program application (A.26-05-002).¹ Mission:data Coalition (Mission:data) is a party in proceeding A.25-12-012, and pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), Mission:data hereby responds to Cal Advocates’ Motion to Consolidate (Motion).

These five applications (filed by SDG&E and SoCalGas over the past eight months) are best addressed through consolidation in the same docket. Mission:data supports consolidation for many of the same reasons stated in Cal Advocates’ Motion. First, under Commission Rule 7.4, these applications present closely “related questions of law [and] fact” such that consolidation is warranted.² Second, given the procedural statuses of the applications, no parties will be prejudiced by the consolidation.

¹ Application (A.) 26-06-014 et al., *Public Advocates Office Motion to Consolidate* (July 20, 2026).

² CPUC Rule 7.4.

I. The Applications Present Related Questions of Fact and Law

The consolidated proceeding can appropriately serve as a forum in which parties and the Commission will address all of SDG&E and SoCalGas's information technology and enterprise software revenue requests comprehensively, and can ensure there is no duplicate recovery from ratepayers. While there is no formal scoping ruling in any of these proceedings yet, the TY 2028 GRC can encompass all the questions relevant to SDG&E and SoCalGas's AMI proceedings. This includes (a) whether the investments proposed in the AMI proceedings are prudently incurred and comply with Commission precedent and policy, and (b) whether the revenue requirements necessary to pay for such proposals result in just and reasonable rates.

Likewise, Sempra's SAP Application concerns issues that are appropriate for consideration in a consolidated docket including the two companies' GRCs. The SAP Application proposes to update Sempra's enterprise resource planning (ERP) platform, which it claims is as significant to the Companies' businesses as a "central nervous system."³ The SAP Application addresses the development, roll-out, and revenue requirement for the software platform that Sempra claims will coordinate data exchanges across the entire company and ensure such data is available in the forms necessary to all different parts of Sempra's system.⁴ Over the past three decades, the companies' software infrastructure has become a "highly complex and bespoke environment—an integrated ecosystem with significant interdependencies and customizations such that a change in one component can ripple across multiple functional areas."⁵ In addition to clearly being related to other topics raised in the TY 2028 GRC, this issue relates closely to facts and concerns

³ A.26-05-002, *Application of Southern California Gas Company and San Diego Gas & Electric Company for Authorization to Implement Revenue Requirement to Enable SAP Migration Program* (May 1, 2026) at 2.

⁴ *Id.* at 3.

⁵ *Id.*

Mission:data has identified in this AMI proceeding—issues related to data access, data availability, system uptime, future-proofing, software infrastructure, and the costs and benefits of proprietary and open software.⁶

Furthermore, as the Motion explained, the venue of a GRC permits parties and the Commission to view the Companies' AMI and software update proposals in context,⁷ and to take a comprehensive view of the financial impacts and trade-offs the Companies have argued are justified. A comprehensive view is particularly relevant to Mission:data's concerns regarding data access for customer-authorized third parties due to the interconnected nature of Sempra's information technology systems. Both the Commission and Mission:data want to avoid unanticipated "ripple effects" between disjointed proceedings that could impair regulatory oversight of these critical areas of utility operations.

II. Parties to the Applications Will Not Be Prejudiced by Consolidation

Consolidating these cases would not result in any significant duplication of effort or waste of parties or the Commission's resources. The Commission has yet to issue a scoping ruling in any of the proceedings, and no hearings or merits briefings have occurred.⁸ Parties to the various proceedings will not be prejudiced by the consolidation.

⁶ See generally A.25-12-012, *Protest of Mission:data Coalition to San Diego Gas & Electric Company's Application for Approval of Smart Meter 2.0 Proposal*.

⁷ Motion at 2.

⁸ Consolidating these cases would also resolve an ambiguity in the A.25-12-012 procedural schedule. The Administrative Law Judge ordered SDG&E to file supplemental testimony and then instructed parties to file "responsive testimony to SDG&E's supplemental testimony" on or before September 15, 2026. See A.25-12-012, *Administrative Law Judge's Ruling Granting Motion to File Supplemental Testimony* (June 4, 2026). However, as there is no Scoping Ruling in the case, there is currently no deadline for the responsive testimony to SDG&E's original testimony, leaving parties unsure as to when that responsive testimony is due.

First, setting aside Mission:data (which supports consolidation but is currently only party in one of these proceedings), there is significant overlap between the parties in the applications to be consolidated.

Second, to the extent parties identify potential procedural concerns, the assigned ALJ will retain full authority to minimize or avoid them through case management by structuring the consolidated proceedings in a manner that promotes efficiency and expediency—including (if necessary) separate timelines, records, hearings, or briefing.

Lastly, Mission:data agrees with Cal Advocates that SDG&E’s existing AMI application remains deficient, and that consolidation would provide SDG&E with the opportunity to actually cure these deficiencies. Cal Advocates’ Motion re-states its argument that SDG&E’s Smart Meter (SM) 2.0 Application does not have the required cost-effectiveness analysis.⁹ And as Mission:data argued in its pending Motion to Dismiss, SDG&E’s “proposed SM 2.0 deployment does not include a proposal to comply with the Commission’s binding orders requiring SDG&E to provide each customer with near-real-time access to their energy usage data via a device of the customer’s choosing.”¹⁰ SDG&E’s Supplemental Testimony (served June 4, 2026) failed to adequately address either of these concerns. The interconnectedness of information technology systems – specifically, between the ERP and new advanced metering infrastructure – means that consolidation would permit SDG&E to address its SM 2.0 Application deficiencies in a more holistic venue.

⁹ Motion at 6 (citing A.25-12-012, Protest of Public Advocates Office at 1).

¹⁰ A.25-12-012, *Mission:data Motion to Dismiss Application 25-12-012 Without Prejudice* at 1.

III. Conclusion

The Commission should grant Cal Advocates' *Motion to Consolidate*.

Respectfully submitted,

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