

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



**FILED**

Order Instituting Rulemaking to Modernize the  
Electric Grid for a High Distributed Energy  
Resources Future

Rulemaking 21-06-017  
(Filed June 24, 2021)

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**SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 E) INDEPENDENT  
PROFESSIONAL ENGINEER PRELIMINARY DATA ADEQUACY REPORT**

Roger A. Cerda  
8330 Century Park Court, CP32D  
San Diego, CA 92123-1530  
Telephone: (858) 654-1781  
Email: rcerda@sdge.com

Attorney for:  
SAN DIEGO GAS & ELECTRIC COMPANY

September 4, 2026

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Pursuant to the *Administrative Law Judges' Ruling Setting Schedule for the 2026-2027 Distribution Planning and Execution Process Cycle* dated April 20, 2026,<sup>1</sup> San Diego Gas & Electric Company hereby submits its Independent Professional Engineer Preliminary Data Adequacy Report dated September 4, 2026. The report is attached hereto as **Attachment A**.

Respectfully submitted,

/s/ Roger A. Cerda

Roger A. Cerda  
8330 Century Park Court, CP32D  
San Diego, CA 92123  
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<sup>1</sup> Page 5 of the Ruling states, "each utility files and serves its IPE Preliminary Analysis of 2025-2026 GNA/DUPR data adequacy" on Friday, September 4, 2026.

**INDEPENDENT PROFESSIONAL ENGINEER PRELIMINARY DATA ADEQUACY  
REPORT**



# IPE Preliminary Data Adequacy Report – SDG&E

09•04•2026

# Topics

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- IPE Scope
- Deliverables
- IPE Plan Status/Data Adequacy



# IPE Scope

- IPE scope of work:
  - Established in 2020/21 Cycle by CPUC Ruling of 4/13/2020
  - New steps added in this cycle for pending loads and scenario planning
  - Covers 28 business process steps (listed in the IPE Plan and later in this presentation)
  - Starting with actual load data collection/adjustment for weather, forecasting system load and DER growth, system load disaggregation all the way to the planning and execution of distribution projects
  - Plan includes Verification and Validation for each business process step
- Verification of the following steps were skipped in this cycle since the ED and the IPE determined that it was not expected to yield additional insights
  - Steps 5-7 - Convert Peak Growth to 8760 Profile, Determine Net Load and Peak Load.
  - Steps 9-11 - Initial Comparison to Equipment Ratings, Evaluate No Cost Solutions and Comparison to Equipment Ratings after No Cost Solutions.
  - Step 14 - Development of capital costs for the planned investments.

## IPE Scope (contd.)

- IPE scope of work:
  - Verification and validation of the following steps will not be performed in this cycle since the requirement for DIDF solicitations have been eliminated as per the 2024 Decision
    - Step 15 - Development of Candidate Deferral Projects
    - Step 16 - Development of operational requirements for CDOs
    - Step 17 - Prioritization of Candidate Deferral Projects into Tiers
    - Step 18 - Calculation of LNBAs for planned projects
  - In addition, the following steps will be skipped in this cycle.
    - Step 19 - Compare 2025 forecast and actuals at circuit level
    - Step 21 - Review plan for changes to the planning process for the next cycle
    - Step 22 - Review implementing of planning standard and/or planning process
    - Step 23 - Review list of internally approved capital projects
    - Step 25 - Track solicitation results to inform next cycle

## IPE Scope (contd.)

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- New Steps added in the cycle include\*:
  - Step 4b - Determine hot spots
  - Step 4c - Gather Pending Loads data used in Step 2
  - Step 13b - Develop solution for single investment plan
  - Step 13c - Determine if planned solutions/projects identified in previous cycles continue to be needed and are the appropriate solution to meet the need ( project scope and timing)
  - Step 20b - Analyze pending load tracking dataset. Review categorization of PL and supporting information.

Note: These steps are only required to the extent each utility is implementing hot spots for pending loads and/or scenario planning

# Plan/Reports and Target Timing

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- Final IPE Plan submitted on August 17, 2026
- IPE Preliminary Analysis of GNA/DUPR Data Adequacy (this report) for all three IOUs submitted September 4, 2026
- IPE DPAG Report for each IOU presenting GNA/DUPR review findings and Verification & Validation outcomes due on November 6, 2026
- IPE Post DPAG Report covering all three IOUs, comparing their filings, reviewing compliance, and making recommendations for process improvements due on March 15, 2027

# Preliminary Review of Data Adequacy

- Format follows IPE Plan for the utility
- Provides brief description of the process and the approach
- Provides status of the data provided
- Provides indication of the adequacy of the data supplied or planned to be supplied to the IPE to perform its V&V review
  - Adequate demo/data provided
  - Demo/data not yet provided but planned to provided
  - No demo/data required
- Data supplied to IPE at this time is more detailed than is provided to the service list so the indications of adequacy above may not apply to the what might be adequate for stakeholders use since they may have received less information. Per CPUC decision, all data provided to the IPE will also be made available to stakeholders (unless confidential).

## Preliminary Review of Data Adequacy (2)

| Step | Description                                                                                 | Verification Approach                         | Status                 |
|------|---------------------------------------------------------------------------------------------|-----------------------------------------------|------------------------|
| 1    | Collect 2025 actual circuit loading and adjust for weather as needed                        | IPE analysis of data provided by SDG&E        | Partial data provided* |
| 2    | Determine load and DER annual growth on system level                                        | IPE analysis of data provided by SDG&E        | Adequate data provided |
| 3    | Disaggregate load and DER annual growth to the circuit level                                | IPE analysis of data provided by SDG&E        | Adequate data provided |
| 3a   | Check sum of all disaggregated load and DERs same as CEC IEPR System Level values           | IPE analysis of data provided by SDG&E        | Adequate data provided |
| 4a   | Gather Known Load data that is used in Step 2                                               | IPE analysis of data provided by SDG&E        | Adequate data provided |
| 4b   | Determine Hot Spots                                                                         | IPE analysis of data provided by SDG&E        | N/A                    |
| 4c   | Gather Pending Loads data used in Step 2                                                    | IPE analysis of data provided by SDG&E        | Adequate data provided |
| 5    | Convert peak growth of load to 576 profile as needed                                        | Not included in this cycle per Final IPE Plan | N/A                    |
| 5a   | Convert DER growth to 576 profile as needed                                                 | Not included in this cycle per Final IPE Plan | N/A                    |
| 5b   | Convert base forecast and Weather normalization adjustment of load to 576 profile as needed | Not included in this cycle per Final IPE Plan | N/A                    |
| 6    | Derive net load profile                                                                     | Not included in this cycle per Final IPE Plan | N/A                    |

\* The IPE has requested additional information from SDG&E regarding Steps 1 and 8

## Preliminary Review of Data Adequacy (3)

| Step | Description                                                                                                                                    | Verification Approach                                    | Status                                                |
|------|------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|-------------------------------------------------------|
| 7    | Determine net peak load                                                                                                                        | Not included in this cycle per Final IPE Plan            | N/A                                                   |
| 8    | Adjust for "extreme weather"                                                                                                                   | IPE review of process documentation                      | Partial data provided*                                |
| 9    | Initial comparison to equip. ratings to determine if ratings exceeded                                                                          | Not included in this cycle per Final IPE Plan            | N/A                                                   |
| 10   | Evaluate no cost solutions – incorporate load transfers, phase balancing, correct data errors                                                  | Not included in this cycle per Final IPE Plan            | N/A                                                   |
| 11   | Comparison to equip. ratings to determine if ratings exceeded                                                                                  | Not included in this cycle per Final IPE Plan            | N/A                                                   |
| 12   | Compile GNA tables showing need amount and need timing, etc. (consistent with IOU's documented planning standards and/or planning process)     | IPE analysis of data provided by SDG&E                   | Adequate data provided                                |
| 13a  | Develop recommended solution and generate list of Planned Investments (follow the IOU's documented planning standards and/or planning process) | IPE analysis of data provided by SDG&E. Demo, if needed. | Adequate data provided                                |
| 13b  | Develop solution for single investment plan (Not applicable to SDG&E for this cycle)                                                           | Not included in this cycle per Final IPE Plan            | N/A                                                   |
| 13c  | Determine if planned solutions/projects identified in previous cycles continue to be needed and are the appropriate solution to meet the need  | IPE analysis of data provided by SDG&E                   | To be provided in early September as per the IPE Plan |

## Preliminary Review of Data Adequacy (4)

| Step | Description                                                                                           | Verification Approach                         | Status                                             |
|------|-------------------------------------------------------------------------------------------------------|-----------------------------------------------|----------------------------------------------------|
| 14   | Estimate capital cost for Candidate Deferral Projects                                                 | Not included in this cycle per Final IPE Plan | N/A                                                |
| 15   | Development of Candidate Deferral Projects list through application of screens (timing and technical) | Not included in this cycle per Final IPE Plan | N/A                                                |
| 16   | Development of operational requirements (daily, monthly annually etc.)                                | Not included in this cycle per Final IPE Plan | N/A                                                |
| 17   | Prioritization of candidate deferral projects into Tiers                                              | Not included in this cycle per Final IPE Plan | N/A                                                |
| 18   | Calculate LNBA ranges and values for all planned investments                                          | Not included in this cycle per Final IPE Plan | N/A                                                |
| 19   | Compare 2025 load forecast and actuals at circuit level for selected number of distribution circuits  | Not included in this cycle per Final IPE Plan | N/A                                                |
| 20a  | Analyze known load tracking dataset and verify the calculation of known load metrics                  | IPE verification of data provided by SDG&E    | To be provided by September 15 as per the IPE Plan |
| 20b  | Analyze pending load tracking dataset. Review categorization of PL and supporting information.        |                                               | To be provided by September 15 as per the IPE Plan |
| 22   | Review implementing of planning standard and/or planning process                                      | Not included in this cycle per Final IPE Plan | N/A                                                |
| 23   | Review list of internally approved capital projects                                                   | Not included in this cycle per Final IPE Plan | N/A                                                |
| 24   | Respond to and incorporate DPAG comments                                                              | N/A                                           | To be completed after the DPAG meeting.            |

## Preliminary Review of Data Adequacy (5)

| Step | Description                                                    | Verification Approach                                    | Status                                                   |
|------|----------------------------------------------------------------|----------------------------------------------------------|----------------------------------------------------------|
|      |                                                                |                                                          | Date to be set by CPUC                                   |
| 25   | Track solicitation results to inform next cycle                | Not included in this cycle per Final IPE Plan            | N/A                                                      |
| 26   | Treating confidential material in the IPE report               | Process agreed to by ED, SDG&E and IPE                   | Process to be followed prior to completion of IPE Report |
| 27   | Review methodology used for prioritization of planned projects | No Applicable                                            | N/A                                                      |
| 28   | Review project execution tracking data and metrics             | IPE analysis of data provided by SDG&E. Demo, if needed. | To be completed by Late September/Early October          |

# Comments/Questions