



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

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Application of San Diego Gas & Electric
Company (U 902-E) for Approval of Palomar
Decarbonization Demonstration Project.

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JOINT RULE 13.9 MEET AND CONFER REPORT

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JOINT RULE 13.9 MEET AND CONFER REPORT

I. INTRODUCTION

Pursuant to Rule 13.9 of the California Public Utilities Commission’s (“Commission” or “CPUC”) Rules of Practice and Procedure, San Diego Gas & Electric Company (“SDG&E”), the Public Advocates Office (“Cal Advocates”), the California Environmental Justice Alliance (“CEJA”), the Coalition of California Utility Employees (“CUE”), San Diego Community Power and Clean Energy Alliance (collectively, “SD CCAs”), The Utility Reform Network (“TURN”), and Utility Consumers’ Action Network (“UCAN”) (collectively, “Parties”) hereby submit this Joint Rule 13.9 Meet and Confer Report.¹

SDG&E filed Application (“A.”) 25-12-009 on December 16, 2025, requesting Commission approval of the Palomar Decarbonization Demonstration Project (“Palomar Project” or “Project”). The Palomar Project proposes to install and operate an integrated green hydrogen production, storage, and dispensing system at SDG&E’s Palomar Energy Center in Escondido, California. Protests and/or responses to the Application were filed by Cal Advocates, Air Products, CUE, SD CCAs, TURN, and UCAN. On May 27, 2026, the assigned Commissioner issued the Scoping Memo and Ruling in this proceeding. Intervenor testimony was served on

¹ Pursuant to Rule 1.8(d), counsel for SDG&E certifies that she has been fully authorized by Cal Advocates, CEJA, CUE, SD CCAs, TURN, and UCAN to submit this joint report on their behalf.

August 21, 2026 by all parties that submitted protests/responses and by CEJA, and rebuttal testimony was served by SDG&E and UCAN on September 18, 2026.

On October 2, 2026, counsel for the Parties participated in a meet and confer session as required by Rule 13.9.² This Joint Report summarizes the results of that conference and addresses the items specified in Rule 13.9(a)(1) through (5).

II. DISCUSSION

A. Rule 13.9 Discussion Items

During the meet and confer session, the Parties discussed the following items as required by Rule 13.9(a)(1) through (5):

- (a)** Motions Expected to Be Filed: The Parties do not anticipate filing any motions at this time other than: (1) a joint motion to move testimony and exhibits into the record, and (2) corresponding motion(s) to seal the evidentiary record pursuant to Rule 11.4 and/or Rule 11.5. Additionally, at the time of this filing, SDG&E is assessing the need to file errata to correct any errors in testimony. The Parties reserve the right to file additional motions in this proceeding.
- (b)** Uncontested Facts and Issues: The Parties were unable to identify any facts or issues that are entirely uncontested among all Parties. The Parties dispute the merits, costs, benefits, design, and ratemaking treatment of the Project.

² The meet and confer session was conducted via video conference on October 2, 2026, with representatives from SDG&E, CEJA, SD CCAs, TURN, and UCAN participating. SDG&E met and conferred individually with representatives from CUE and Cal Advocates on October 5, 2026.

- (c) Disputed Facts and Issues: The disputed facts and issues for each Party are set forth in Section II.B below.
- (d) Narrowing of Issues: The Parties were unable to significantly narrow the disputed issues through the meet and confer process. The fundamental areas of disagreement regarding the Project's costs, benefits, design, and ratemaking treatment remain.
- (e) Settlement: The Parties have not engaged in settlement discussions, and do not at this time anticipate resolving this matter or disputed issues via settlement.
- (f) Evidentiary Hearings: Despite the disputed issues described below, the Parties agree that evidentiary hearings are not necessary in this proceeding under the assumption that discovery related to rebuttal testimony will be sufficient to establish material facts. During the meet and confer, SDG&E agreed to make every effort to respond to data requests going forward on an expedited basis to address party concerns about the sufficiency of discovery without evidentiary hearings. In lieu of evidentiary hearings, the Parties propose the following procedural mechanism for submitting testimony and other exhibits into the evidentiary record.

On or before November 6, 2026, the Parties will submit a joint motion to enter testimony and exhibits into the evidentiary record, which would include the proposed exhibit list with the appropriate exhibit designations. The Parties expect that they will be able stipulate to the admission of most if not all the exhibits. This would allow the Parties to reference the proposed exhibits numbers set forth in the exhibit list in their respective briefs as necessary. If the Parties

are unable to stipulate to the admission of an exhibit(s), the joint motion will identify that exhibit(s) along with the offering parties' proffer and the objecting parties' position.

B. List of Disputed Issues and Facts

Set forth below is each Party's list of disputed facts and issues:

1. TURN

- TURN disputes SDG&E's contention that the project serves the public interest (Issue 1), including facts underlying that contention.
- TURN disputes the reasonableness of SDG&E's project costs and associated revenue requirement (Issue 2).
- TURN disputes SDG&E's forecast of avoided GHGs (Issue 4).
- TURN disputes SDG&E's claims that the cost of the project relative to its value to ratepayers is just and reasonable (Issue 5).
- TURN disputes the reasonableness of SDG&E's proposed two-way balancing account if the project is found just and reasonable (Issue 6).
- TURN's testimony does not address Issue 3 (environmental benefits of blending hydrogen with methane), other than disputing SDG&E's ability to deliver on its claimed environmental benefits, or Issue 7 (ESJ Plan impacts).

2. CEJA

- CEJA disputes SDG&E's contention that the project serves the public interest (Issue 1), including facts underlying that contention.
- CEJA disputes the reasonableness of SDG&E's project costs and associated revenue requirement (Issue 2).
- CEJA disputes SDG&E's claimed environmental benefits for this Project (Issue 3).
- CEJA disputes SDG&E's forecast of avoided GHGs (Issue 4).
- CEJA disputes SDG&E's claims that the cost of the project relative to its value to ratepayers is just and reasonable (Issue 5).
- CEJA disputes SDG&E's claims that the Project does not increase emissions in environmental and social justice communities and that the Commission should authorize a revenue requirement for an RD&D project that SDG&E developed through a process that is inconsistent with the goals of the Commission's Environmental and Social Justice Action Plan (Issue 7).
- CEJA testimony does not address Issue 6.

3. SD CCAs

- The SD CCAs dispute SDG&E's contention that the Project serves the public interest, including facts underlying that contention (Issue 1).
- The SD CCAs dispute the reasonableness of SDG&E's proposed costs and associated revenue requirement, including SDG&E's proposed cost allocation between bundled and unbundled customers (Issue 2).
- The SD CCAs dispute SDG&E's assertions that the cost of the Project relative to its value is just and reasonable (Issue 5).
- The SD CCAs dispute the reasonableness of SDG&E's proposed ratemaking treatment, including the reasonableness of SDG&E's proposed vintaging treatment (Issue 6).
- The SD CCAs' testimony does not address Issues 3, 4, and 7.

4. UCAN

- UCAN disputes whether the project serves the public interest (Issue 1).
- UCAN disputes whether the project costs and associated revenue requirements are reasonable (Issue 2).
- UCAN disputes whether environmental benefits exists and, if so, justify assigning these costs to any customer (Issue 3).
- UCAN disputes whether greenhouse gas emissions will be avoided by this Project (Issue 4).
- UCAN disputes whether the cost of the project relative is just and reasonable (Issue 5).
- UCAN disputes whether SDG&E's proposed two-way balancing account is the appropriate mechanism if the project is found just and reasonable (Issue 6).
- UCAN disputes whether the Project addresses the impacts on environmental and social justice communities, and whether the Project impacts the achievement of any of the nine goals of the Commission's Environmental and Social Justice Action Plan (Issue 7).

5. Cal Advocates

- Cal Advocates disputes SDG&E's claim that the project serves the public interest (Issue 1).
- Cal Advocates disputes the reasonableness of the project costs, including SDG&E's claim that the project sufficiently leveraged public funding sources (Issue 2).
- Cal Advocates disputes SDG&E's claim that the cost of the project relative to its value to ratepayers is just and reasonable (Issue 5).

6. CUE

- CUE does not dispute the facts as presented by SDG&E.

II. CONCLUSION

The Parties respectfully submit this Joint Rule 13.9 Meet and Confer Report for the Commission's consideration. The Parties appreciate the Commission's time and effort in resolving this proceeding in an efficient manner.

Respectfully submitted,

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San Diego Community Power and Clean Energy Alliance,

The Utility Reform Network, and

Utility Consumers' Action Network

October 7, 2026