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 its 2027 Electric Procurement Revenue Requirement Forecasts, 2027 Electric Sales Forecast, and GHG-Related Forecasts	A.26-05-009

SUR-REPLY COMMENTS OF SAN DIEGO COMMUNITY POWER AND CLEAN ENERGY ALLIANCE ON OCTOBER UPDATE

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Pursuant to the July 22, 2026, *Assigned Commissioner's Scoping Memo and Ruling*[1] and the Administrative Law Judge's (ALJ) November 5, 2026 procedural e-mail permitting sur-reply comments, San Diego Community Power[2] ("SDCP") and Clean Energy Alliance[3] ("CEA") (together, the "SD CCAs") hereby submit these Comments regarding *San Diego Gas & Electric Company's* ("SDG&E") *(U 902-E) October Update to Application (Amended)* submitted on October 16, 2026 ("October Update").[4]

In reply comments on the October Update, SDG&E requests Commission approval to recover the year-over-year increase in its Local Generation revenue requirement (approximately $58.8M) over two years, rather than the single year currently reflected in SDG&E's Application ("LG Proposal").[5] According to SDG&E, the LG proposal would benefit all customers through a

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[1] Application ("A.") 26-05-009, *Assigned Commissioner's Scoping Memo and Ruling*, p. 5 (Jul. 22, 2026).

[2] SDCP is the Community Choice Aggregator ("CCA") for the cities of Chula Vista, Encinitas, Imperial Beach, La Mesa, National City, and San Diego, and the unincorporated areas of San Diego County.

[3] CEA is the CCA for the cities of Carlsbad, Del Mar, Solana Beach, Escondido, San Marcos, Oceanside, and Vista.

[4] A.26-05-009, *San Diego Gas & Electric Company's (U 902-E) October Update to Application (Amended)* (Oct. 15, 2026) ("October Update").

[5] San Diego Gas & Electric Company's (U 902-E) Reply Comments at 14 (Nov. 6, 2026).

lower Local Generation rate, which is a part of SDG&E's delivery rates.[6] The LG Proposal will reduce customers' delivery rates by $0.00171/kWh, which would save customers roughly $0.68 per month (assuming monthly usage of 400 kWh).[7]

The SD CCAs support SDG&E's LG proposal because it would reduce rates for all customers. However, the SD CCAs note that SDG&E is already proposing a 2.3 percent decrease in total bundled system average rates, whereas it is proposing a **17.7 percent increase** in system average delivery-plus Power Charge Indifference Adjustment (PCIA) rates for unbundled customers relative to currently effective rates.[8] The modest delivery rate relief SDG&E proposes in its reply comments ($0.00171/kWh), therefore, is vastly overshadowed by the rate increases departed customers will experience (greater than $0.04/kWh for certain vintages). These rate increases are magnified by SDG&E's unreasonable Resource Adequacy (RA) accounting proposals, including its understated Forecast of Sold RA volumes in 2027, and its improper exclusion of RA buffer volumes from Forecast Retained RA.[9] Therefore, while the Commission should approve SDG&E's LG Proposal, it should also adopt the SD CCAs proposed modifications to SDG&E's RA accounting to mitigate the rate increases departed customers will face.

Finally, while the SD CCAs endeavored to evaluate SDG&E's LG Proposal on a highly expedited timeline, and based on that evaluation, recommend the Commission adopt the proposal, the SD CCAs are concerned by the timing of the LG Proposal. New proposals made in the October Update, let alone in reply comments on the October Update, cause extreme prejudice to parties because the procedural schedule in an Energy Resource Recovery Account ("ERRA") Forecast

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6 *Id*.
7 *Id*. (rate tables attached to the updated Direct Testimony of Mindy Guardado).
8 *See* Comments of SD CCAs on October Update at 1 (Oct. 30, 2026).
9 *Id.* at 3-4.

proceeding does not permit a thorough review of those proposals. The Commission should discourage SDG&E from making new proposals in ERRA Forecast proceedings via the October Update and subsequent filings.

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Respectfully submitted,
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