

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

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Application of San Diego Gas &  
Electric Company (U 902 M) for  
Establishment of an Interim Rate Relief  
Mechanism for its Wildfire Mitigation  
Plan Costs.

Application 21-07-017

**COMMENTS OF THE PUBLIC ADVOCATES OFFICE ON PROPOSED ISSUES  
TO CONSIDER IN SCOPE OF PROCEEDING**

**CAROLYN CHEN**

Attorney

Public Advocates Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Telephone: (415) 703-1980  
Email: [Carolyn.Chen@cpuc.ca.gov](mailto:Carolyn.Chen@cpuc.ca.gov)

October 20, 2021

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**I. INTRODUCTION**

Pursuant to the Administrative Law Judge’s (“ALJ”) Procedural Email Regarding the Agenda for October 13, 2021 Telephonic Prehearing Conference (“Procedural Email”), dated October 12, 2021, the Public Advocates Office at the California Public Utilities Commission (“Cal Advocates”) provides the following comments on the proposed scoping issues listed in the Prehearing Conference Final Agenda (“Final Agenda”) attached to the Procedural Email.

**II. DISCUSSION**

**A. Proposed Issues to Consider**

The Final Agenda proposed several issues as within the scope of this proceeding. Cal Advocates agrees that the listed issues are appropriately within the scope of this proceeding. In addition, Cal Advocates proposes an addition to Proposed Issue 2.a so that it reads as follows (addition in bold and underlining).

2) Whether the Commission should adopt SDG&E’s proposal to update the recorded balances for 2019-2023 and amortize them in rates through SDG&E’s annual regulatory account balance update process.

a) Whether SDG&E’s proposal to amortize 50 percent of the incremental WMPMA expenditures incurred in the 2019-2021 period over 20 months and subsequent incremental expenditures for

the 2022-2023 period over 12 months is reasonable, **or what alternative method and/or proposal, if any, should be adopted.**

Cal Advocates recommends the proposed additional language to allow consideration of alternative methods or proposals, if any, that should be adopted instead of SDG&E's proposal.

## **B. Scheduling**

Per the ALJ's comments at the October 13, 2021 prehearing conference, the parties met and conferred to discuss the schedule for this proceeding, including any alternative schedules proposed by the parties that include dates for submission of intervenor testimony and evidentiary hearings. On October 18, 2021, the parties met to discuss scheduling. Cal Advocates is amenable to the schedule agreed to by the parties, on October 18, 2021, provided below.

<b>Event</b>	<b>Date</b>
Prehearing Conference	October 13, 2021
Meet and Confer	October 18, 2021
Comments on Proposed Scope	October 20, 2021
Assigned Commissioner's Scoping Memo and Ruling Issued	November 2021
Intervenor Testimony, if necessary	December 10, 2021
Evidentiary Hearings, if necessary	December 16, 2021
Opening Briefs	January 10, 2022
Reply Briefs	January 20, 2022
Proposed Decision	Early March 2022
Comments on Proposed Decision	The parties are open to a shortened comment period as necessary to accommodate a Commission vote on the Final Decision at the April 7, 2022 meeting.
Final Decision	April 7, 2022 (or the first voting meeting in April)

### III. CONCLUSION

Cal Advocates appreciates the opportunity to provide comments on the proposed issues to consider and other topics related to this proceeding.

Respectfully submitted,

/s/ CAROLYN CHEN  
Carolyn Chen  
Attorney for

Public Advocates Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Telephone: (415) 703-1980  
Email: [Carolyn.Chen@cpuc.ca.gov](mailto:Carolyn.Chen@cpuc.ca.gov)

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