BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED
05/02/22
12:40 PM
A2107017

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 (Filed July 30, 2021)

NOTICE OF THE UTILITY REFORM NETWORK, UTILITY CONSUMERS' ACTION NETWORK, AND CALIFORNIA FARM BUREAU FEDERATION OF EX PARTE COMMUNICATION

TURN
THE UTILITY REFORM NETWORK
Lower bills. Livable planet.

Robert Finkelstein
General Counsel
The Utility Reform Network
785 Market Street, 14th floor
San Francisco, CA 94103
415-929-8876 x311
bfinkelstein@turn.org

May 2, 2022

**NOTICE OF THE UTILITY REFORM NETWORK,
UTILITY CONSUMERS' ACTION NETWORK, AND
CALIFORNIA FARM BUREAU FEDERATION
OF EX PARTE COMMUNICATION**

Pursuant to Rule 8.4 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), The Utility Reform Network ("TURN") hereby notifies parties that TURN, Utility Consumers' Action Network ("UCAN"), and California Farm Bureau Federation ("CFBF") hereby give notice of the following *ex parte* communication in the above-referenced proceeding.

Robert Finkelstein, General Counsel of TURN, Edward Lopez, Executive Director of UCAN, and Kevin Johnston, Associate Counsel of CFBF (collectively, "Intervenors"), participated in the following *ex parte* meetings:

- April 28, 2022, at 9:00 AM – with Sean Simon, Chief of Staff to Commissioner Clifford Rechtschaffen;
- April 28, 2022 at 11:00 AM – with Maria Sotero, Advisor to Commissioner John Reynolds; and
- April 29, 2022, at 12:00 PM – with Kelsey Choing, Energy and Water Advisor, and Leuwam Tesfai, Chief of Staff and Legal Advisor to Commissioner Genevieve Shiroma.

The April 28 meetings took place via Webex and lasted approximately twenty minutes. The April 29 meeting took place via phone and also lasted approximately 20 minutes.

Intervenors expressed their support for the Proposed Decision of ALJ Nilgun Atamturk and urged that it be adopted without modification. Intervenors noted that the changes sought in SDG&E's opening comments would give utilities largely unlimited opportunities to seek interim rate recovery whenever a substantial balance appears in any ratemaking account, without a need to demonstrate compelling circumstances. Intervenors also explained that SDG&E's reliance on $40 million of additional interest cost was procedurally defective, as the figure was first presented in the utility's reply brief, and incorrect, as it failed to reflect the economic benefit that would likely more than offset the incremental cost. Intervenors discussed the record evidence regarding SDG&E's credit rating, noting that the Moody's report the utility relied upon explained a recent upgrade to that rating, and noted a number of credit-positive elements even as it acknowledged the need to incur and recovery additional wildfire-related costs. Finally, Intervenors urged that SDG&E's reference to a TURN-sponsored "alternative" be ignored, as there was no such alternative but rather identification of a mathematical error that warranted correction should the Commission adopt interim recovery over TURN's objections.

May 2, 2022

Respectfully submitted,

By:__________________

Robert Finkelstein

Robert Finkelstein, General Counsel

THE UTILITY REFORM NETWORK
785 Market Street, Suite 1400
San Francisco, CA 94103
Phone: (415) 929-8876, ex. 307
Fax: (415) 929-1132
Email: bfinkelstein@turn.org

For TURN, UCAN and CFBF