

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



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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 A.21-07-017

**COMMENTS ON PROPOSED SCOPE OF
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M)**

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October 20, 2021

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I. INTRODUCTION

Pursuant to Administrative Law Judge (ALJ) Atamturk's Final Agenda for the October 13, 2021 prehearing conference (PHC), San Diego Gas & Electric Company (SDG&E) submits these Comments on the Proposed Scope.

II. THE PARTIES PROPOSE AN AGREED ALTERNATIVE SCHEDULE FOR CONSIDERATION

As discussed during the PHC, SDG&E's General Rate Case (GRC) will be filed in May of 2022. It is important for SDG&E to understand whether the Commission has approved the interim relief mechanism proposed in this Application prior to submission of the GRC, as the outcome of this proceeding will inform SDG&E's discussion of GRC rate impacts and may influence SDG&E's GRC proposals on issues such as amortization of recovery. Moreover, a quick decision regarding SDG&E's interim relief proposal better achieves SDG&E's goals of mitigating rate shock and aligning the method of recovery for some wildfire mitigation costs closer to the period during which they were incurred.

On October 18, 2021, pursuant to ALJ Atamturk's direction at the PHC, parties to this proceeding participated in a meet and confer. The parties included: SDG&E, Southern California Edison Company (SCE), the Public Advocates Office at the California Public Utilities

Commission (Cal Advocates), The Utility Reform Network (TURN), the Utility Consumers' Action Network (UCAN), and the California Farm Bureau Federation (Farm Bureau). The discussion focused on the alternative schedule proposed by TURN during the PHC and whether the parties could agree to a schedule that accommodates the request of TURN and UCAN to incorporate intervenor testimony and evidentiary hearings into a proceeding schedule that accommodates a Commission Final Decision on SDG&E's application in early April 2022. The parties agreed to propose the following schedule, subject to the approval of ALJ Atamturk and the Assigned Commissioner.

Event	Date
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. SDG&E WOULD LIKE TO CLARIFY PROPOSED ISSUE 1(c)

In the Final Agenda for the PHC, ALJ Atamturk introduced several proposed issues to be considered within the scope of the proceeding. SDG&E generally agrees with the proposed scope, but requests that the final Scoping Memo clarify proposed issue 1(c): "Whether SDG&E's

request for an interim relief of the 2021-2023 expenditures on a *forecast basis* is reasonable.”¹ SDG&E is not proposing that the Commission approve interim relief for 2021 – 2023 on a forecast basis. Rather, SDG&E provided its 2021 – 2023 WMPMA forecasts to give an illustration of the increasingly escalating costs of wildfire mitigation² and to allow the Commission and parties to understand the potential rate impacts of the interim relief mechanism. If approved, SDG&E will implement interim relief based on actual recorded known expenditures recorded to the WMPMA through the annual filing process. SDG&E’s is not requesting interim relief on a forecast basis, but rather proposes using the same mechanism for 2019-2023, which the Commission may address through Issue 1. SDG&E thus requests that item 1(c) be removed from the final scope of issues.

IV. CONCLUSION

SDG&E appreciates the opportunity to provide these Comments on the Proposed Scope.

Respectfully submitted,

By: /s/ Laura M. Fulton

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¹ Telephonic Prehearing Conference Agenda (Oct. 13, 2021) (emphasis added).

² See Application of San Diego Gas & Electric Company for Establishment of an Interim Rate Relief Mechanism for its Wildfire Mitigation Plan Costs (July 30, 2021) at 11.