

**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.

A.21-07-017  
(Filed: July 30, 2021)

**UTILITY CONSUMERS' ACTION NETWORK (UCAN) COMMENTS  
ON PROPOSED SCOPE AND PROCEDURAL SCHEDULE**



October 20, 2021

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**I. INTRODUCTION**

Pursuant to the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the September 9, 2021, and October 12, 2021 e-mail rulings of Administrative Law Judge Nilgun Atamturk, and the directions from the PreHearing Conference of October 13, 2021, the Utility Consumers' Action Network ("UCAN") provides these comments concerning the proposed scope and procedural schedule issued in the above-captioned proceeding.

In this Application, San Diego Gas & Electric ("SDG&E") is seeking to establish an interim rate relief mechanism for wildfire mitigation expenditures recorded in SDG&E's Wildfire Mitigation Plan memorandum accounts. Under the proposed mechanism, SDG&E is requesting authorization to recover 50 percent of the recorded wildfire mitigation expenditures, which are incremental to those authorized for recovery in SDG&E's general rate case and other wildfire-related regulatory account, subject to a later reasonableness review and refund with interest if appropriate. SDG&E's request covers the period from 2019 to 2023. SDG&E is not requesting a reasonableness review in this application.

UCAN, jointly with The Utility Reform Network, filed a protest on September 3, 2021. UCAN participated in the PreHearing Conference on October 13, 2021.

## II. UCAN COMMENTS

### 1. Scoping Issues.

UCAN generally supports the presentation, and wording, of the scoping issues as included in the Agenda for the PreHearing Conference as found in ALJ's Atamturk's October 12<sup>th</sup> email ruling.

- 1) Whether the Commission should grant SDG&E's request to establish an interim rate relief mechanism for wildfire mitigation expenditures recorded in SDG&E's Wildfire Mitigation Plan Memorandum Accounts (WMPMAs) during the 2019-2023 period.
  - a) Whether SDG&E sufficiently demonstrated a need for an interim rate relief.
  - b) Whether SDG&E's proposal promotes fairness, minimizes costs, and provides better rate stability for SDG&E customers.
  - c) Whether SDG&E's request for an interim relief of the 2021-2023 expenditures on a forecast basis is reasonable.
- 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.
  - b) What, if any, additional reporting requirements the Commission should adopt.

UCAN understands various parties may suggest changes which, we do not believe, significantly or materially alter the nature of the issues to be scoped and adjudicated in this proceeding. For instance, that the Public Advocates Office ("Cal Advocates") may suggest that paragraph (2a) be further clarified/caveated to consider whether "alternative method and/or proposal, if any, should be adopted." And we are led to believe that SDG&E may propose that paragraph/issue (1c) should be removed from the scope as redundant. UCAN understands SDG&E's rationale to be that they intend to use recorded expenditures rather than forecasts for 2021-2023 - the same mechanism for all years (2019-2023) – and, hence, the Commission may address the timeframe through Proposed Issue 1.

Based on our current understanding of these potential edits, UCAN does not outright object to the proposed changes that may be offered by the Parties. Outside of these points, UCAN does not itself raise issues or questions regarding whether the listed issues should be in or out or if there are missing issues.

2. Schedule.

The Parties to this proceeding held a Meet-and-Confer on October 18, 2021, to discuss a schedule for this proceeding. UCAN believes SDG&E will present the proposed schedule in its Comments; UCAN supports the revised schedule as we believe it seeks to accommodate considerations for Intervenor Testimony, as well Evidentiary Hearings, if necessary. The proposed schedule resulting from the Meet-and-Confer also reflects a briefing schedule to keep a Proposed Decision on-track for an early March 2022 timeframe. Consequently, if adopted, this would align a Final Decision in April 2022 which is still before the projected 2022 utilities General Rate Case applications.

**III. CONCLUSION**

UCAN appreciates the opportunity to participate in this proceeding and respectfully submits these comments.

Dated: October 20, 2021

Respectfully submitted,  
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