

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



FILED

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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**

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April 18, 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 14, 2022, at 1:00 PM – with Jason Reiger, Interim Legal and Policy Advisor to Commission President Alice Busching Reynolds; and
- April 15, 2022, at 9:30 AM – with Candace Choe, Water, Telco, Safety and Legal Policy Advisor to Commissioner Darcie Houck.

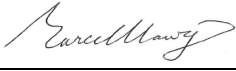
The meetings took place via Webex and lasted approximately twenty minutes.

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 not only require a virtual complete re-write of the Proposed Decision, but 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.

April 18, 2022

Respectfully submitted,

By: 
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