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April 2, 2024

Executive Director, Rachel Peterson  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

**RE: San Diego Gas & Electric Company 2023 Annual Report of Rule 20 Conversions to Comply with Decision 21-06-013, Phase 1 Decision Revising Electric Rule 20 and Enhancing Program Oversight**

Dear Executive Director Peterson:

Pursuant to California Public Utilities Commission Decision (“D.”) 21-06-013, Ordering Paragraph (“OP”) 14 (i), OP 14 (ii) and OP 15, San Diego Gas & Electric (“SDG&E”) hereby submits a full report on its overhead to underground conversion work completed during the year 2023 (“Report”). The Report includes comprehensive information on project and community level data, a corresponding shape file, as well as confidential files regarding project cost information for Rule 20A, 20B, and 20C projects; there have been no Rule 20D projects completed or initiated in the SDG&E service territory in 2023, therefore no information is provided in the Report.

SDG&E is submitting a confidential version of the completed Report to the CPUC, including reporting information on project and community level data, a corresponding shape file, as well as confidential files regarding project cost information. SDG&E is serving a redacted version of the Report for the public, inclusive of reporting information on project and community level data and will subsequently post this information on SDG&E’s Rule 20 website. The redacted version of the Report is attached hereto.

**Information Related to the Termination of Rule 20 A**

D.21-06-013 (“Phase 1 decision”) and D.23-06-008 (“Phase 2 decision”) provide for the termination of the Commission’s Rule 20 A program, and address some issues relating to the orderly transition out of Rule 20 A. The following summarizes how SDG&E intends to wind down the Rule 20 A program.

Electric Rule 20 sets policies and procedures for electric utilities to convert overhead power lines and other equipment to underground facilities at the request of a local government, or private applicant. Electric Rule 20A is a subprogram of Electric Rule 20 that allocates ratepayer-funded work credits to local governments and cities for projects that meet specific project eligibility criteria. The Phase 1 decision revises Electric Rule 20A to (a) discontinue new work credit

allocations for Rule 20A projects after December 1, 2022, and (b) clarifies Rule 20A project eligibility criteria and work credit transfer rules. The Phase 2 decision permanently discontinues Rule 20A and addresses some transition issues related to work credit allocations. There are also transition issues not addressed directly by these CPUC decisions, and this summary discusses SDG&E's proposed treatment of such issues.

Work credits are allocated to communities on an annual basis.<sup>1</sup> The CPUC has previously permitted local governments to borrow from up to five years of future work credit allocations. The CPUC also permits, in limited circumstances, reallocation of work credit balances from "inactive" communities to communities actively pursuing projects. As the Report indicates, several communities served by SDG&E have negative work credit balances, what the Commission calls work credit debt.<sup>2</sup> Other communities have a positive work credit balance, and are proceeding with projects, or are interested in doing so. There are two basic transition issues implicated by the discontinuation of work credit allocations discussed in this summary: (a) projects in active construction budgeted based on allocations properly borrowed or available under the rules in effect at the time allocations were discontinued, and (b) reallocation of work credits as permitted by the CPUC.

With respect to item (a), for projects budgeted and undertaken based on allocations properly borrowed or available at the time the projects commenced construction, SDG&E expects to complete those projects based on the allocations expected under the CPUC rules existing at the time of discontinuation. With respect to item (b), SDG&E will proceed on a basis that will maximize the opportunity, consistent with CPUC decisions, for local governments to use existing credits (as indicated in the Report) to proceed with projects funded by such credits.

While SDG&E submits that the foregoing complies with the CPUC's requirements for ratepayer funding under Rule 20A, SDG&E may choose to seek additional guidance from the CPUC regarding these transition issues.

Sincerely,

/s/ Clay Faber

Clay Faber

Director – Regulatory Affairs

cc: Service List R.17-05-010  
Julian Enis, Energy Division, CPUC  
Messay Betru, Energy Division, CPUC

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<sup>1</sup> Allocations are based on SDG&E's Rule 20 tariff and as determined by the CPUC in SDG&E's general rate case.

<sup>2</sup> D.21-06-013, pp. 10 and finding of fact 7, p. 33.



California Public Utilities Commission

## Annual Report Electric Rule 20 Programs (A-C)

### GENERAL

**BACKGROUND:** As directed in Decision 21-06-013, electric utilities shall annually report to the Commission information about all of the projects, expenditures, and work credit balances for all communities in their service territories. This annual report template is designed for reporting all Rule 20A, 20B, and 20C projects in the reporting period. The first sheet is for project level data and the second sheet is for community level data.

The utilities shall meet with Energy Division or vice versa upon request to further refine the template prior to the annual submission deadline of April 1. Therefore, this template may be subject to change.

**INSTRUCTIONS:** Complete the spreadsheet, listing all Electric Rule 20 programs' project and community level data from January 1, 2021 to December 31, 2023. Please include all projects from planning phase to close out phase. The annual report is split into three tranches in order of importance of the data. Staff requests that the utilities make data available as they complete each tranche. Data provided should include everything up to December 31st, 2023 (i.e., data recorded after this date should NOT be included in this year's report). Do not leave cells blank; if a column is not applicable to a specific project please indicate this using "N/A" and if a value for a column is unknown indicate this using "Unknown."

Additionally, the utilities shall work with staff regarding the availability of project files in GIS format. GIS data should be provided in a shape file and should include project boundary, path of overhead infrastructure to be converted to underground, and path of trench where underground equipment is to be placed. The attribute table for each project should include all data in the project tab.

If the report contains confidential information, provide two separate versions via through KiteWorks: a redacted version for public distribution and an unredacted version. The files must be searchable and filterable.

If you have questions, contact Julian Enis at [Julian.Enis@cpuc.ca.gov](mailto:Julian.Enis@cpuc.ca.gov) and Messay Betru at [Messay.Betru@cpuc.ca.gov](mailto:Messay.Betru@cpuc.ca.gov).

This is the current template as of 11/02/2023.

### DEFINITIONS

Definitions of urban areas, urban clusters, and rural areas are per the US Census Bureau's 2010 definitions, which can be found here: <https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural/2010-urban-rural.html>

Urban Area: Areas meeting minimum population density requirements and encompassing more than 50,000 people.

Urban Cluster: Areas meeting minimum population density requirements and encompassing more than 2,500 people and less than 50,000 people.

Rural Area: All areas not defined as either urban areas or urban clusters.





Community	Work Credits Referenced for Rule 20B Projects, Reporting Period	Number of Customers	Outstanding Work Credit Date	Years of Work Credit Debt Service Authorized Allocation	Date of Priority Overlaid Contract Under Rule 20B Reporting Period (Project Reported Closing/Closed Phase Only)	Date of Priority Overlaid Contract Under Rule 20B Reporting Period (Project Reported Closing/Closed Phase Only)	Date of Priority Overlaid Contract Under Rule 20B Reporting Period (Project Reported Closing/Closed Phase Only)	Date Threshold Under Rule 20B Reporting Period	Total Cost of Projects Completed Under Rule 20B Reporting Period	Total Cost of Projects Completed Under Rule 20B Reporting Period (100 Work Only)	Total Cost of Projects Completed Under Rule 20B Reporting Period (100 Work Only)	Work Credit Ledger Balance, End of Reporting Period (Balance From Prior Year - Work Credit Deductions)	Last Authorized Work Credit Allocation (2023 Estimate Q - Column K)	Number of Projects in Planning Phase Reporting Period	Number of Projects in Estimating/Design Phase Reporting Period	Number of Projects in Construction Phase Reporting Period	Number of Projects in Closing Phase Reporting Period	Number of Projects in Closed Phase Reporting Period	Work Credits Referenced to Rule 20B Projects (Used by Number of Customers)	Work Credits Referenced to 2023	Projects in Top 20B SMC as Defined by Customer/Contract	Total Tracked Miles, Last Year of Reporting Period (Project Reported Closing/Closed Phase Only, Rule 20B Only)	Work Credits Added Through Transfer from Other Community Reporting Year (See Allowable Method of Transfer)	Work Credits Deducted for Projects in Other Community Reporting Year (See Allowable Method of Transfer)	Number of Rule 20B Projects Completed to Date	Number of Rule 20B Projects Completed to Date	Number of Rule 20B Projects Completed to Date	Project Sponsor Active/Inactive		
																													Work Credits	Work Credits
City of Allen Volo	02/23	1312	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	Active	
City of Amherst	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0	0	0	0	0	Active
City of Canby	02/23	0870	03/24	4	01/18/24	N/A	01/18/24	0.00	02/24	0.00	02/24	0.00	N/A	1	0	0	0	0	0.00	02/24	0.00	02/24	0.00	0.00	0					