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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. 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. 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,

<u>/s/ Clay Faber</u>
Clay Faber
Director – Regulatory Affairs

cc: Service List R.17-05-010

Julian Enis, Energy Division, CPUC

Messay Betru, Energy Division, CPUC

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

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



California Public Utilties 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 data 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 and Messay Betru at 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.

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		_ vegs Ge Grego	ny of Carolings	Ž.		Name of Street	Total Total	Family	- Annean Orderen	WHEN THE REAL PROPERTY AND ADDRESS OF THE PERTY ADDRESS OF THE	Still State in	2	22	E -	process.	oranean oranean	- Arms	\$45,664.00 \$6.00	96,000.00
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	Services News																Obstan Porché														
Project Spanner	Color In Spans (Rate 200		On .	Unitary Undergrounding Stanton	Projet Nator/Manifes	Project Address (Street, Cop., 24° Sala)	500 Project Type (A/B/C/O)	Against Type	States (States (Series/State)Camerical)			NG, famous or Annual	Tremb Length (III) (Bale 2016 Berg)	Langth, Rough Estimate or Oneign Statements?	Project Cost (Metual) Non-Adjuste	Antoni Cash/ Commit Entimated As Completion (Edic)	Carront/Actual Cont/Es	Exploration for Guille Costs	Contentine Featage of Primary Officine Concentral	Line Familiage of Primary Life Comm	Number of Absters Converted to SC Constan	Angest Speed to State	Project Speed, Report	in Chape File? State State Participal (State Stits Only	is this project being perform	Incorporated Militarium required?	Stern Water Polision Procession Plan (CMPRT) explanal?	Project is Orbon/Orbon Charles/Band (Orbined in the American Community Survey) .		Projected/End Cost to Non- Robspapers	Non-Subspaper Funding Source

The Section of Sectio

Confidential per P.U. Code § 583, G.O. 66-D Rev. 1 as denoted in yellow highlight

San Diego Gas & Electric																												
									Tranche 1 (High P	viority)																		
Community	20A Projects, Reporting Period 4	Number of Customers ₃	Outstanding Work Credit Debt	Years of Work Credi Debt (Active Work Credit Debt / Last Authorised Allocation s	Under Rule 20A, Reporting Period n) (Projects Reported in Closing/Closed Phase Only)	Only)	Miles of Primary Overhead Converted Under Rule 20C, Reporting Period (Projects Reported in Closing/Closed Phase Only)	Miles Trenched Under Rule 23A, Reporting Period _{3,4}	Total Cost of Projects Completed Under Rule 20A, Reporting Period ;	Completed Under Rule 208, Reporting Period (IOU Work Only)	Total Cost of Projects Completed Under Rule 20C, Reporting Period (IOU Work Only)	Reporting Period (Balance from Prior Year - Work Credit Deductions)	Last Authorized Work Credit Allocation (2022) (Column Q + Column R)	Number of Projects i 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	n Number of Projects in Closed Phase, Reporting Period	Work Credits Redeemed for Rule 20A Projects Divided by Number of Customers	Work Credits Redeemed in 2023 _E	Projects in Top 25% DAC as Defined by CalEnviroScreen?	Miles, Last Year of	Work Credits Added Through Transfer from Other Community, Reporting Year (Any Allowable Method of Transfer) 10	Deducted for Transfer to Other Community, Reporting Year (Any Allowable Method of Transfer)	Number of Rule 20A Projects Completed to Date		Projects Completed to Date	Project Sponsor Active/Inactive?
City of Aliso Viejo	\$0.00		\$0.00	0	0.00		N/A	0.00	\$0.00		\$2.00	\$0.00		N,O.					\$0.00	\$0.00		0.00	\$0.00			0 0		0 Inactive
City of Carlsbad	\$0.00		\$0.00		0.00		N/A	0.00	\$0.00		\$400,531.44			N/A					\$2.00	\$0.00		0.00	\$0.00			0 0		1 Active
City of Chula Vista	\$0.00		\$0.00	0	0.00		N/A	0.00	\$0.00	\$365,252.60	\$454,273.16	\$12,135,220.70		N,OL				0 :	\$0.00	\$0.00		0.00	\$0.00			0 1		2 Active
City of Coronado	\$0.00		\$2.00	0	0.00		N/A	0.00	\$0.00	\$0.00	\$0.00	\$2,845,596.22		N,OL				0 1	\$0.00	\$0.00		0.00	\$0.00			0 0		0 Inactive
City of Dana Point	\$0.00	19431	\$2.00		0.00		N/A	0.00	\$0.00	\$0.00	\$2.00	\$3,006,464.29		N/A					\$2.00	\$0.00		0.00	\$0.00			0 0		0 Active
City of Del Mar	\$0.00	3022	\$0.00	D	0.00	N/A	N/A	0.00	\$0.00	\$484,680.10	\$275,998.67	\$351,741.51		N,CA	9			0	\$0.00	\$0.00	No	0.00	\$0.00	1		0 1	. 5	SActive
City of El Cajon	\$0.00	41205	\$2.00		0.00	N/A	N/A	0.55	\$0.00	\$715,530.60	\$2.00	\$3,726,694.00		N/A				1	\$0.00	\$0.00		0.00	\$0.00			0 1		0 Active
City of Encinitiss	\$0.00	25493	-\$56,881.80			N/A	N/A	0.00	\$0.00	\$0.00	\$1,525,653.22	[556,881.86		N/A					\$0.00	\$0.00		0.00	\$0.00			0 0		S Active
City of Escondido	\$0.00	55779	\$0.00	D	0.00	N/A	N/A	0.00	\$0.00	\$0.00	\$2,693,595.00	\$3,053,173.64		N,CA				0 1	\$0.00	\$0.00	No	0.00	\$0.00	1		0 0		4 Active
City of Imperial Beach	\$0.00		\$2.00			N/A	N/A	0.00	\$0.00		\$2.00	\$2,197,995.97		N/A					\$0.00	\$0.00		0.00	\$0.00			0 0		0 Active
City of La Mesa	\$0.00		\$0.00	0	0.00		N/A	0.00	\$0.00		\$2.00	\$8,206,165.64		N,OL				0 1	\$0.00	\$0.00		0.00	\$0.00			0 0		0 Active
City of Laguna Beach	\$0.00	1894	\$0.00	D	0.00		N/A	0.00	\$0.00	\$0.00	\$0.00	\$857,978.82		N,CA	2			0	\$0.00	\$0.00	No	0.00	\$0.00	1		0 0		0 inactive
City of Laguna Hills	\$0.00		-\$28,559.00		0.00		N/A	0.00	\$0.00		\$2.00	[528,559.00		N/A					\$0.00	\$0.00		0.00	\$0.00			0 0		0 Inactive
City of Laguna Niguel	\$0.00		\$0.00	0	0.00		N/A	0.00	\$0.00		\$2.00	\$14,225.98		N,OL				0 1	\$0.00	\$0.00		0.00	\$0.00			0 0		0 Active
City of Lemon Grave	\$0.00	10433	\$0.00	D	0 0.29		N/A	3.28	\$0.00		\$648,549.92	\$8,380,518.52		N,CA				1	\$0.00	\$0.00		0.00	\$0.00			0 0		1 Active
City of Mission Viejo		12053	\$2.00		0.00		N/A	0.00	\$0.00		\$2.00	\$366,830.00		N/A					\$0.00	\$0.00		0.00	\$0.00			0 0		0 Inactive
City of National City	\$0.00		-\$430,858.21	9		N/A	N/A	0.00	\$0.00		\$125,462.90	(\$430,858.29)	N,CA				0	\$0.00	\$0.00		0.00	\$0.00	1		0 0		1 Active
City of Oceanside	\$0.00		\$0.00	0	0.00		N/A	0.00	\$0.00	\$744,972.67	\$803,894.93	\$4,890,127.11		N/A					\$0.00	\$0.00	No	0.00	\$0.00			0	7	2 Active
City of Poway	\$20,929.00		-\$255,483.00		0.00		N/A	0.60	\$0.00	\$0.00	\$1,459,078.57	[5224,554.52		N/A				2	\$1.04	\$0.00		0.00	\$0.00			0 0		2 Active
City of San Clemente	\$0.00	30491	\$0.00		0.00	N/A	N/A	0.00	\$0.00	\$0.00	\$0.00	\$2,750,542.52	1	N,CA	1	-		0	\$0.00	\$0.00	No	0.00	\$0.00	1		0 0		0 Active
City of San Diego	\$114,657.00	627112	\$2.00		0 12.67		N/A	36.26	\$0.00	\$4,821,803.11	\$5,644,720.80	\$100,103,895.34		N/A	22	25	2	2 1	50.18	\$0.00		5.11	\$0.00			9	. 12	2 Active
City of San Juan Capistrano	\$0.00	14297	\$2.00		0.00		N/A	0.00	\$0.00	\$0.00	\$340,283.50	\$219,999.79		N/A				0	\$0.00	\$0.00		0.00	\$0.00			0 0		1 Inactive
City of San Marcos	\$0.00	37024	\$0.00		0.00	N/A	N/A	0.00	\$0.00	\$383,061.29	\$413,672.33	\$86,331.46	1	N,CA	1	-		1	\$0.00	\$0.00	No	0.00	\$0.00	1		0 1		1 Inactive
City of Santee	\$0.00		\$2.00			N/A	N/A	0.00	\$0.00		\$365,055.03	\$1,072,256.79		N/A					\$0.00	\$0.00		0.00	\$0.00			0 1		2 Active
City of Solana Beach	\$0.00				0.00		N/A	0.00	\$0.00		\$2.00			N/A				0	\$0.00	\$0.00		0.00	\$0.00			0 0		0 Inactive
City of Vista	\$0.00	29208	-\$1,367,995.85	5	0.00		N/A	0.00	\$0.00	\$842,843.60	\$783,171.57	[\$1,367,995.85)	N,CA		-		2	\$0.00	\$0.00	No	0.00	\$0.00	1		0 3		2 Inactive
County of Orange	\$0.00		\$2.00		0.00		N/A	0.00	\$0.00		\$2.00	\$17,819.97		N/A					\$0.00	\$0.00		0.00	\$0.00			0 0		0 Inactive
County of San Diego	\$0.00	189984	\$0.00	0	0 1.06	N/A	N/A	2.86	\$0.00	\$1,321,446.01	\$1,290,716.97	\$27,265,546.12		N/A	17			1 1	\$0.00	\$0.00	No	0.00	\$0.00			0		8 Active

Footnotes

To Controller

To Control