

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

Application of Southern California Gas Company for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2024.

Application No. 22-05-015
(Filed May 16, 2022)

And Related Matter.

Application No. 22-05-016
(Filed May 16, 2022)

**SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 M) SUBMISSION AND
SUPPLEMENTAL TESTIMONY SUPPORTING ITS TRACK 2 REQUEST TO
AUTHORIZE RECOVERY OF INCREMENTAL WILDFIRE MITIGATION COSTS
INCURRED FROM 2019-2022**

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I. INTRODUCTION

As directed by the Assigned Commissioner’s Scoping Memo, San Diego Gas & Electric Company (SDG&E or Company) respectfully submits this Track 2 filing and supplemental testimony supporting the Company’s request that the California Public Utilities Commission (CPUC or Commission) find just and reasonable SDG&E’s incremental costs and expenses supporting its wildfire mitigation initiatives from May 2019 through 2022, and authorize recovery of the undercollected costs and ongoing revenue requirement in rates. Specifically, SDG&E asks the Commission to:

- Find just and reasonable SDG&E’s incremental Operations and Maintenance (O&M) costs totaling \$284 million, and capital expenditures totaling \$1,188 million, recorded in SDG&E’s Electric and Gas Wildfire Mitigation Plan Memorandum Accounts (WMPMAs) from May 2019 through the end of 2022 and not previously approved in the 2019 General Rate Case (GRC), and authorize recovery of the undercollected balance associated with those costs from 2019-2022, totaling \$372 million;

- Authorize the revenue requirement associated with SDG&E's WMPMA through SDG&E's Test Year (TY) 2028 General Rate Case (2023-2027), totaling \$775 million; and
- Authorize recovery in rates of SDG&E's total requested revenue requirement of \$1.147 billion using SDG&E's affordability proposals of interim rate relief and securitization to reduce residential customer costs and avoid rate shock, as further described below.

In the supporting testimony served with this submission, SDG&E establishes that the incremental 2019-2022 amounts recorded to SDG&E's WMPMA are just and reasonable, promote the safety of SDG&E's customers, employees, and communities, and reduce the risk of wildfire. For these reasons, the requested amounts should be approved without modification. SDG&E further provides its Affordability Proposal to reduce costs for residential customers and smooth rates.

The testimony is organized as follows: Chapter 1 discusses SDG&E's wildfire mitigation program, the development of SDG&E's Wildfire Mitigation Plans, and SDG&E's WMP expenditures; Chapter 2 discusses SDG&E's WMPMAs, the incrementality of the costs requested in SDG&E's Track 2 submission including the independent audit performed by Ernst & Young addressing cost incrementality, and the calculation of SDG&E's requested revenue requirement; Chapter 3 discusses the wildfire risk and fire history in SDG&E's service territory; Chapter 4 discusses Financial Policy and SDG&E's Affordability Proposal; and Chapter 5 discusses the Affordability metrics required by Decision (D.) 22-08-023.

II. THE COMMISSION SHOULD AUTHORIZE SDG&E'S INCURRED WILDFIRE MITIGATION COSTS IN FULL

The safety of SDG&E's customers, employees, and communities is the Company's top priority. Between 2007 and 2022, SDG&E has spent nearly \$5 billion in overall wildfire mitigation and vegetation management efforts to protect the safety of its customers and

communities, earning the company a position as a recognized global leader in wildfire mitigation. In 2020, S&P Global Ratings described SDG&E's position on the forefront of wildfire innovation:

Over the past decade [SDG&E] has been a leader in wildfire on through the implementation of technology and system hardening. These measures reduce the probability that the company will be the cause of a catastrophic wildfire. As a direct result of the company's proactive ingenuity . . . the company has developed a strong track record of either avoiding wildfires or not being the cause of a catastrophic wildfire.¹

SDG&E's incurred costs here result from SDG&E's approved WMP and updates, are incremental to SDG&E's 2019 GRC, and are critical to public safety.

A. SDG&E's Wildfire Mitigation Investments Protect the Safety of Its Customers, Communities, and the Environment

SDG&E's service territory experiences numerous conditions conducive to wildfire, including the Santa Ana winds that have been directly linked to some of the largest and most destructive wildfires in Southern California. These Santa Ana winds, coupled with other weather conditions and dry fuels present an increased risk of catastrophic wildfires.² The Commission has recognized the risk of catastrophic fires in Southern California since 2007, and the heightened risk associated with specific areas of SDG&E's service territory within the HFTD.³

Approximately 64% of SDG&E's service territory is within the HFTD, where there is an increased potential for wildfires. Because of these risks, and SDG&E's early situational awareness and weather capabilities, SDG&E aided in developing its High Fire Threat Districts

¹ S&P Global Ratings, *Ratings Direct, San Diego Gas & Electric Co.*, (Jun. 30, 2020) at 2.

² The Commission recognized specific areas of SDG&E's service territory at an even higher risk of fire in D.17-12-024, which established the High Fire Threat District (HFTD). Approximately 64% of SDG&E's service territory is within the HFTD, where there is an increased potential for wildfires.

³ D.17-12-024 at 5.

and has consistently aimed to target wildfire mitigations proportionate to the areas that present the highest risk. Further, as discussed further in the direct testimony of Thom Portor, California continues to experience and understand the increasing effects of climate change, SDG&E's "fire season" continues to evolve. While the highest risk Santa Ana winds are still most prevalent during the late summer and early fall, wildfire conditions exacerbated by conditions such as persistent drought and extreme heat events can now be present almost year-round.

As a result, wildfire mitigation has been at the core of SDG&E's focus since the 2007 wildfires in SDG&E's service territory. Since those tragic events, SDG&E has established itself as the industry leader in utility wildfire mitigation and takes great pride in its position at the forefront of innovation as the world's climate continues to change, exacerbating the risk of catastrophic wildfires in California. With almost no roadmap to follow, SDG&E leveraged community and academic partnerships, new technologies and science, and developed a team of in-house experts to build a leading-edge wildfire mitigation program long before it was required to do so by the Wildfire Legislation.

Among SDG&E's early efforts were the development of a first-in-kind utility weather network to improve situational awareness, an in-house meteorology program, and overhead hardening of SDG&E's transmission system in addition to targeted replacement of high-risk distribution infrastructure, such as small wire. Additionally, leveraging some of its new situational awareness tools, SDG&E pioneered the use of Public Safety Power Shutoffs (PSPS) as a last resort method to reduce the risk of ignition during dangerous Santa Ana wind conditions. Many of these efforts likely aided SDG&E in avoiding potential infrastructure-related ignitions during the drought conditions that plagued California for the past decade, and

have gained recognition by the utility industry, California state officials,⁴ and leading credit ratings agencies.⁵

B. The Wildfire Legislation Further Expanded Wildfire Mitigation Activities

The catastrophic wildfires that plagued California in 2017 and 2018 made it apparent that the risk of electrical-infrastructure related ignitions required significant mitigation investments, including more situational awareness, emergency preparedness, and grid hardening. Senate Bill (SB) 901, passed in 2018, and Assembly Bill (AB) 1054, passed in 2019 (together, the “Wildfire Legislation”), mandated that California electrical corporations to prepare Wildfire Mitigation Plans (WMP) covering three-year periods and annual WMP Updates that must be approved by the Commission or its successor in reviewing those plans, the Office of Energy Safety.⁶ The state’s electrical corporations were required to “invest in hardening of the state’s electrical infrastructure and vegetation management to reduce the risk of catastrophic wildfire,”⁷ adopt preventative strategies and programs to minimize the risk of electrical infrastructure causing

⁴ “Wildfires and Climate Change: California’s Energy Future” Governor Newsom’s Strike Force Report (“Strike Force Report”) (April 12, 2019) at 11 (“SDG&E engaged in a robust fire mitigation and safety program after experiencing devastating fires in its service territory in 2007 and has become a recognized leader in wildfire safety.”) *See also* “Final Report of the Commission on Catastrophic Wildfire Cost and Recovery” (June 17, 2019) at 7 (“[SDG&E] is widely recognized as a global leader on utility wildfire practices.”)

⁵ *See* S&P Global Ratings, “How are California’s Wildfire Risks Affecting Utilities’ Credit Quality” (Jun. 3, 2021) at 10 (referring to SDG&E as a “global leader” in wildfire mitigation); *see* Moody’s June 23, 2022 (“SDG&E’s wildfire risk prevention and mitigation practices have helped SDG&E to avoid any catastrophic wildfires over the last fourteen years, including in the last few years when particularly challenging weather and climate conditions have affected California.”).

⁶ *See, e.g.*, Public Utilities (Pub. Util.) Code § 8386(c)(3).

⁷ AB 1054, Section 2.

wildfires, including consideration of dynamic climate change risks,⁸ and describe their efforts to mitigate wildfire risk and reduce the scale and scope of PSPS events.

SDG&E's initial WMP addressed both the already existing wildfire mitigation efforts at the Company, as well as improvements and enhancements to existing programs to meet the state's wildfire mitigation objectives.⁹ The WMP provided an overarching strategy to develop:

processes and programs to understand wildfire risk, conditions, and behaviors to provide the Company and its customers with time and information to take appropriate action; build, construct, and operate a fire-hardened electric distribution and transmission system in a manner that minimizes the possibility of igniting a fire; educate customers and stakeholders on wildfire risk; and support customers affected by outages.¹⁰

As detailed in its WMP submissions, SDG&E has responded to the state's call for increased wildfire risk reduction through implementation of necessary programs and initiatives, including:

- The densest utility weather network in the nation, with over 220 weather stations, fuel moisture sensors, and Normalized Difference Vegetation Index (NVDI) cameras in the HFTD;
- A leading meteorology department to monitor real-time fire conditions in the territory and provide daily fire weather forecasts, which inform both PSPS preparedness as well as construction and work schedules;
- Development of SDG&E's weather models, including the Fire Potential Index (FPI) and the Santa Ana Wildfire Threat Index (SAWTI), which rates Santa Ana wind events and benefits not only SDG&E but also inform community partners such as the United States Forest Service;
- Emergency response operations, including SDG&E's in-house team of fire coordinators who have built strong relationships with community first responders, fire suppression crews who are dispatched to support SDG&E operations, and

⁸ Pub. Util. Code § 8386(c)(3).

⁹ San Diego Gas & Electric Company, 2019 Wildfire Mitigation Plan (February 6, 2019) (2019 WMP) available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M263/K673/263673421.PDF>.

¹⁰ *Id.* at 6.

aerial firefighting resources, including year-round operation of SDG&E's Air-Crane helitanker;

- A risk-informed approach to grid hardening, including an optimized combination of overhead system hardening, covered conductor, and strategic undergrounding based on SDG&E's Wildfire Next Generation System (WiNGS) Planning model and informed by SDG&E's technological and engineering expertise;
- Additional infrastructure enhancements to reduce risk, including advanced protection such as early fault detection and falling conductor protection, asset replacements, and operational protocols such as Sensitive Ground Fault Settings;
- Community engagement operations to support emergency and PSPS preparedness, informed by SDG&E's network of community partners and its Wildfire Safety Community Advisory Council, which includes members from SDG&E senior leadership and SDG&E's Board Safety Committee, as well as important community partners such as 211 San Diego and first responder agencies;
- Infrastructure enhancements and tools to mitigate PSPS impacts, including targeted installation of microgrids and generator grant programs to support customers and communities during periods of de-energization; and
- Enhanced vegetation management operations, including pole brushing to mitigate the risk of an ignition spreading to nearby vegetation.¹¹

SDG&E has embraced a culture of continuous improvement regarding its wildfire mitigation initiatives. It seeks to continue its status as an industry leader by further enhancing its risk modeling, data governance, inspection methodologies, and improving customer awareness and preparedness for both PSPS events and wildfire emergencies. SDG&E has also leveraged stakeholder, community, and regulatory feedback to further refine and enhance programs to meet community and safety needs.

As required by AB 1054, SDG&E submitted its first three-year comprehensive WMP in 2020, followed by annual updates in 2021 and 2022. Each of SDG&E's Wildfire Mitigation

¹¹ The majority of SDG&E's vegetation management operations are recorded to SDG&E's Tree Trimming Balancing Account and are not the subject of SDG&E's Track 2 request.

Plans and annual updates has received regulatory approval and been ratified by the Commission.¹²

SDG&E was recently recognized by the Office of Energy Infrastructure Safety as having a “relatively strong Wildfire Mitigation Plan compared to the plans of the other large electrical corporations currently being evaluated. SDG&E knows its wildfire risk and is focused on the highest risk circuits on its system.”¹³ This recognition would not be possible without the wildfire mitigation investments that SDG&E made from 2019-2022.

Mitigating the risk of ignition in the HFTD also results in qualitative benefits throughout SDG&E’s service territory. For instance, a catastrophic wildfire that starts in the HFTD has the potential to spread outside the HFTD—which occurred during the 2007 Witch Fire—posing a safety threat to additional homes, businesses, and lands. Additionally, fires that burn entirely within the HFTD may result in impacts outside of the burn area, including reduced air quality due to smoke and other environmental impacts. Fires also “poison[] the air across vast swaths of the state,” putting public health at risk and emitting millions of carbon particles into the air, compounding the challenge of reducing greenhouse gas emissions.¹⁴ Thus, SDG&E’s efforts to

¹² D.19-05-039 (approving SDG&E’s 2019 WMP Submission); Resolution WSD-005, Resolution Ratifying Action of the Wildfire Safety Division on San Diego Gas & Electric Company’s 2020 Wildfire Mitigation Plan Pursuant to Public Utilities Code Section 8386, (June 11, 2020) (ratifying WSD’s approval of SDG&E’s 2020 WMP); Resolution WSD-019, Resolution Ratifying Action of the Wildfire Safety Division on San Diego Gas & Electric’s 2021 Wildfire Mitigation Plan Update Pursuant to Public Utilities Code Section 8386. (July 20, 2021) (ratifying Energy Safety’s approval of SDG&E’s 2021 WMP); Resolution SPD-1, Resolution Ratifying Action of the Office of Energy Infrastructure Safety on San Diego Gas & Electric Company’s 2022 Wildfire Mitigation Plan Update Pursuant to Public Utilities Code Section 8386 (August 25, 2022) (ratifying Energy Safety’s approval of SDG&E’s 2022 WMP), available at <https://www.cpuc.ca.gov/industries-and-topics/wildfires/wildfire-related-resolutions>.

¹³ Office of Energy Infrastructure Safety, Decision on SDG&E 2023-2025 Wildfire Mitigation Plan (October 13, 2023) at 1.

¹⁴ Strike Force Report at 5 (citation omitted).

reduce the risk of catastrophic wildfire positively impact the entirety of its customer base and the overall public.

SDG&E's wildfire mitigation investments, including the initiatives implemented from 2019-2022, have shown demonstrable success in risk reduction, improvements in customer safety, improvements in customer emergency preparedness, and reduced PSPS impacts. SDG&E has not experienced a significant utility-caused wildfire since 2007. Without SDG&E's early investments in wildfire mitigation, given the fire conditions present from 2017-2020 throughout the state, the SDG&E service territory could have easily experienced a catastrophic utility-related fire like those that occurred elsewhere in the state. The Commission's expert analysis of the 2019 PPS events, conducted by fire modeling expert Technosylva, concluded that SDG&E's use of de-energization likely resulted in significant wildfire risk reduction.¹⁵ SDG&E's overall success to date in wildfire reduction merits a finding that its incremental 2019-2022 wildfire mitigation costs are just and reasonable.

C. SDG&E's Recorded Wildfire Mitigation Costs Are Incremental to its TY 2019 Authorized Revenue Requirement

Critical to the present application, the Wildfire Legislation was passed while SDG&E's TY 2019 GRC request was pending approval by the Commission. Due to the timing, many of SDG&E's efforts to implement its new WMP were not included in its TY 2019 GRC forecasts or its authorized revenue requirements for 2019-2021. SDG&E's TY 2019 GRC thus did not anticipate or authorize forecasts that would allow the Company to achieve a level of wildfire risk reduction consistent with state direction or comply with its WMP initiatives. Jonathan

¹⁵ California Public Utilities Commission, 2019 PPS Event – Wildfire Analysis Report for SDG&E; Technosylva, Inc. (July 9, 2021) Available at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-and-enforcement-division/documents/technosylva-report-on-sdge-psps-events-2019.pdf>

Woldemariam’s testimony discusses SDG&E’s incremental spending on wildfire mitigation at the WMP-initiative level, as well as at the broader overall category level.

In the Wildfire Legislation, the Legislature recognized that the implementation of the WMPs might not align with the utilities’ existing revenue requirements as authorized in their General Rate Cases, and ordered the creation of memorandum accounts for the electrical corporations to record incremental wildfire mitigation costs for subsequent reasonableness review and recovery.¹⁶ These memorandum accounts facilitated SDG&E’s efforts to rapidly assess and reduce wildfire and PSPS risk without implicating retroactive ratemaking. This was particularly important for SDG&E, as the Company’s TY 2019 rate case was submitted and litigated in 2017 and 2018, without an understanding of the requirements that would result from the Wildfire Legislation and the widely recognized need for additional risk reduction. Absent authorization of these memorandum accounts, SDG&E could have been forced to wait out a full GRC cycle—which in SDG&E’s case would have been almost five full years—before commencing necessary wildfire mitigation work.

The Commission authorized SDG&E’s WMPMA) effective May 30, 2019, allowing SDG&E to record incremental costs related to implementation of its WMP. The WMPMA includes both previously authorized amounts (through SDG&E’s TY 2019 GRC) and any incremental costs incurred by SDG&E to put its WMP initiatives in place. SDG&E made these investments to swiftly reduce the risk of catastrophic wildfire and mitigate the impacts of PSPS, benefitting its customers for the years they have been in place. During that time, SDG&E’s service territory has not experienced a significant utility-related wildfire, despite often unprecedented weather conditions, including drought and prolonged high heat events.

¹⁶ Pub. Util. Code §8386.4.

Consistent with the Commission’s direction and the Wildfire Legislation,¹⁷ SDG&E now requests that the Commission review the incremental costs associated with implementing the Company’s approved WMPs. SDG&E’s previously incurred WMP costs are just and reasonable, as they were prudently incurred and ensured ongoing safe operations of SDG&E’s electrical system and reduced the risk of wildfire, and they should be authorized for recovery. SDG&E’s overall wildfire mitigation costs from 2019 through 2022, amounts already authorized in its TY 2019 GRC, and SDG&E’s incremental wildfire costs are shown in the following table:

Table 1: SDG&E Wildfire Costs (2019-2022)
(\$ in millions)

	Total Spend	Less: TY 2019 GRC Authorized	Incremental Spend
O&M	\$434	\$ 150	\$284
Capital	\$1,789	\$601	\$1,188
Total	\$2,223	\$ 751	\$1,472

The testimony of Craig Gentes describes SDG&E’s process for recording wildfire mitigation costs in the WMPMA, presents the direct cost balances in the accounts (gas and electric), discusses the process for adding appropriate loaders to the recorded direct costs, and provides how SDG&E offset the amounts previously authorized in SDG&E’s TY 2019 GRC. Mr. Gentes further describes SDG&E’s calculation of the ongoing capital related revenue requirement (for years 2023-2027) for the assets recorded to the WMPMA. Typically, ongoing capital-related revenue requirement is addressed through the General Rate Case process in the form of assessing SDG&E’s rate base.

¹⁷ *Id.*

But because the underlying activities had not yet been subject to a reasonableness review when SDG&E filed Track 1 of its General Rate Case,¹⁸ SDG&E is requesting that the Commission review both the reasonableness of the underlying activities and approve the associated costs for 2019 to 2022, as well as these ongoing capital related costs for 2023 to 2027. This process is consistent with what the Commission recently ordered for Pacific Gas and Electric Company (PG&E) with respect to balances recorded to memorandum accounts pending a reasonableness review.¹⁹ SDG&E will then include the continued ongoing capital related costs for all authorized assets in its 2028 GRC.

In addition to SDG&E's internal accounting controls, to further ensure that the costs included in the WMPMA and requested for recovery are reasonable and incremental, SDG&E retained Ernst & Young (E&Y) to perform an independent analysis of costs and provide an opinion on their incrementality. Importantly, E&Y concluded that, of SDG&E's \$2.2 billion in wildfire mitigation capital expenditures and O&M costs incurred from 2019-2022, all but \$0.8 million (extrapolated to \$2.6 million) was appropriately characterized as reasonable and incremental. SDG&E has removed the costs identified by E&Y as transmission related and other items identified for exclusion, totaling the \$0.8 million, from this request. In addition to the adjustments identified by E&Y, SDG&E also identified additional electric O&M costs of \$1.4 million through reviews. These costs have also been removed from the SDG&E's request. SDG&E's total request can be summarized as follows:

¹⁸ See A.21-06-021, *Proposed Decision on Test Year 2023 GRC for PG&E* (Sept. 13, 2021) at 759 (finding that PG&E cannot seek the ongoing revenue requirement in its Track 1 GRC for costs in its wildfire mitigation accounts that are the subject of a separate reasonableness review); See A.21-06-021, *Alternate Proposed Decision on Test Year 2023 GRC for PG&E* (Sept. 13, 2021) at 773 (same).

¹⁹ *Id.* (“For amounts recorded in memorandum accounts, the Commission must first review those costs for reasonableness, and to include costs in rate base they must be both used and useful as well as prudently incurred.”)

**Table 2 – Summary of SDG&E Undercollection
(\$ in millions)**

	Electric Revenue Requirement	Gas Revenue Requirement	Total Request
O&M	\$ 427	\$ 7	\$ 434
Capital	995	20	1,015
Recorded Interest	6	0	6
<i>Less: 2019 Authorized</i>	<i>(298)</i>	<i>(10)</i>	<i>(308)</i>
Total	\$ 1,130	\$ 17	\$ 1,147

D. The Timing of SDG&E’s Cost Recovery Request Is Consistent with the Wildfire Legislation and Commission Direction

As previously addressed, SDG&E’s TY 2019 GRC was based on forecasts that predated AB 1054 and the substantial expansion of wildfire mitigation and system hardening efforts that have taken place since late 2019. SDG&E has recorded those undercollected balances in its WMPMA for over four years to date, resulting in a significant undercollection.

AB 1054 provided two avenues for electrical corporations to request review and approval of WMP costs—either through the GRC process or a separate application at the “conclusion of the time period covered by the plan.”²⁰ Because SDG&E’s WMP covered the period 2020-2022, and its GRC was also not filed until 2022, SDG&E had limited options to seek a review and recovery of its WMPMA recorded costs prior to this submission. Most of SDG&E’s requested costs relate to WMP activities dating from 2020-2022, as this request includes only the latter half of 2019, when SDG&E was just beginning to implement the newly required WMPs. To facilitate a comprehensive review of all WMP-related costs from 2019-2023, SDG&E elected to request recovery of the balances recorded in its WMPMA and predating the Test Year through the GRC

²⁰ Pub. Util. Code § 8386.4(b)(1) and (2).

proceeding in a Track process. This Track 2 request aligns with the time periods covered by SDG&E's 2019 WMP and the three-year 2020-2022 WMP cycle.

The Track approach, ultimately proposed by SDG&E and adopted by the Commission for this proceeding,²¹ is consistent with other proceedings of this nature, meets the requirements of Public Utilities Code Section 8386.4, and provides a predictable and efficient process by which all parties may review the reasonableness of SDG&E's WMP costs. The Track approach to review incremental wildfire mitigation costs was used in Southern California Edison Company's (SCE) TY 2021 GRC as well as PG&E's TY 2023 GRC.²² Additionally, the Commission previously indicated its support for proposals by The Utility Reform Network and Utility Consumers Action Network for SDG&E to request a tracked process to review and approve WMPMA balances recorded prior to TY 2024.²³

While this process provides the final venue for a reasonableness review of costs recorded to its WMPMA, this is not the first time that the Commission, other regulatory stakeholders, and intervenors have had the opportunity to review and opine on SDG&E's forecasted and actual wildfire mitigation costs. The costs associated with SDG&E's WMP have been continually subject to ongoing review and transparency through various Commission and Energy Safety processes. SDG&E provides annual spend projections for each WMP initiative in its annual WMP Update. And its WMP distribution actual expenditures are reported quarterly and annually to Energy Safety and the Commission through its Quarterly Data Reporting and Quarterly Notification Letters established by Public Utilities Code Section 8389.

²¹ Assigned Commissioner's Scoping Memo (October 3, 2022).

²² A.19-08-013 (SCE); A.21-06-021 (PG&E).

²³ D.22-05-001 at 9.

Additionally, the Legislature required that in overseeing compliance with the electrical corporations' WMPs, Energy Safety (and before that the Commission's Wildfire Safety Division) must assess and determine whether "the electrical corporation failed to fund any activities included in its plan."²⁴ To ensure that it is not underfunding plan activities, SDG&E is required to provide "descriptions of all planned WMP initiative spend vs actual WMP initiative spend and an explanation of any differentials between the planned and actual spends" in its Annual Report on Compliance.²⁵ Unjustified underspending of forecasted initiatives may result in a finding of non-compliance and potential fines.²⁶

SDG&E submits this testimony in support of initiatives that the Commission and Energy Safety have reviewed, approved, and ratified, and for which SDG&E now has a compliance obligation. While SDG&E acknowledges that WMP approval does not necessarily equate to authorization of WMP related costs, which must be separately reviewed for reasonableness, it is also important not to divorce the two concepts completely. SDG&E incurred the costs for which it seeks recovery in good faith and to comply with its authorized WMPs. The Commission and Energy Safety have identified areas where SDG&E may improve or enhance its initiatives over time.

But at no point has the Commission affirmatively stated that any WMP initiative is unreasonable or ordered the Company to remove an initiative. Thus, completely disallowing costs or finding an initiative or project unreasonable at this time would contradict and run counter to the previous approval of these projects through the WMP process. This process should

²⁴ Pub. Util. Code § 8386.3(c)(2)(B)(i).

²⁵ CPUC, Wildfire Safety Division – Compliance Operational Protocols (February 16, 2021) at 10.

²⁶ See Pub. Util. Code § 8386(c)(2)(B)(i).

be limited to reviewing the reasonableness of the costs associated with these initiatives, and not a chance to perform wholesale second-guessing of work that SDG&E performed relying on guidance from the WMP process.

Further, while SDG&E's testimony establishes that all of the costs sought for recovery are just, reasonable, and necessary to promote public safety, failing to authorize these costs would be tantamount to punishing SDG&E for years of an exemplary wildfire mitigation record and its role in paving the way for the development of utility wildfire mitigation programs across the world. Such an action could significantly impair the good credit position that SDG&E has maintained, partly because of its strong wildfire mitigation programs, and would run contrary to the intentions of AB 1054.²⁷ It is imperative that the Commission continue to consider SDG&E's obligations to comply with its approved WMP, the transparency of SDG&E's WMP expenditures to date, and the proven effectiveness of SDG&E's WMP initiatives, and find SDG&E's costs just and reasonable

III. SDG&E's INTERIM RELIEF AND SECURITIZATION PROPOSALS SUPPORT AFFORDABILITY

SDG&E acknowledges that. As described in the testimony of Jonathan Woldemariam, SDG&E's wildfire mitigation strategy is risk informed, driven by an ever-increasing supply of data and information, and provides the best value for SDG&E's customers. SDG&E had to consider a myriad of pressures when considering wildfire mitigation investments—including a warming climate, wildfire risks, and customer affordability.

²⁷ AB 1054, §1(a)(4) (“Electrical corporation need capital to fund ongoing operations and make new investments to promote safety, reliability, and California’s clean energy mandates and ratepayers benefit from low utility capital costs in the form of reduced rates.”)

SDG&E acknowledges, however, that the costs proposed for recovery are significant, reflecting four years of investment unanticipated in SDG&E's TY 2019 GRC during a time when external conditions, including a global pandemic, changed significantly. It could cause rate shock for customers using traditional ratemaking, or the three-year amortization period anticipated by the Commission in D.22-05-001.²⁸ For example, using a three-year amortization of authorized costs, a typical bundled non-CARE residential customer would see a monthly bill increase of \$13.28/month in 2025, on top of any other applicable rate increases, including the likely implementation of SDG&E's 2024 GRC Track 1 Decision. Even if interim relief is granted with a three-year amortization, the bill increase for a typical bundled non-CARE residential customer would still be \$11.12 in 2025.²⁹

To achieve the necessary balance between safety and affordability, and to promote the ongoing safe and resilient operation of SDG&E's electrical system, SDG&E requests that the Commission review and approve SDG&E's Affordability Proposal, as described further in the direct testimony of Valerie Bille, consisting of:

- Interim relief of 50% of SDG&E's WMPMA recorded incremental electric undercollected balance as of December 31, 2022 commencing January 1, 2024, on an annual basis until authorization of a final cost recovery mechanism; and
- Securitization of the remaining WMPMA electric balance, which SDG&E will seek through a financing application after this proceeding is final.

²⁸ See D.22-05-001 at 18 (indicating that a three-year amortization period for SDG&E's WMPMA costs would be sufficient); *see also* D.21-10-025 at 23 (citing TURN proposing a 36-month amortization period for SCE's wildfire-mitigation O&M costs).

²⁹ See Direct Testimony of Valerie Bille (Bille Direct) at VB-7.

A. Interim Rate Recovery Benefits Customers

First, simultaneous to the filing of this Submission, SDG&E will file a *Motion for Interim Rate Recovery* (Motion), as discussed below. As noted, the Motion requests approval of Interim Rate Recovery of 50% of SDG&E's electric WMPMA recorded incremental undercollected balance as of December 31, 2022 commencing January 1, 2024, on an annual basis until authorization of a final cost recovery mechanism. That is, if a final cost recovery mechanism is not in place by January 2025, either because SDG&E has submitted an Application for a financing order (further discussed below) or because the Commission has not issued a final decision authorizing recovery of Track 2 costs, SDG&E proposes to continue recovery of 50% of the remaining 2022 WMPMA balance (approximately \$96 million including interest) in 2025, again subject to refund with interest, until approval and implementation of a final cost recovery mechanism. Interim rate recovery should be authorized on an expedited basis because it will save customers about \$15.6 million and reduce the potential for rate shock.

Approval of SDG&E's Interim Rate Recovery Proposal would result in the collection of approximately \$193.8 million in rates in 2024. Any authorized interim rate recovery would be subject to refund with interest, to the extent that the Commission's final decision on this Track 2 Submission approves a lower recovery than that collected through interim rates. For example, if SDG&E's interim relief and securitization proposals are adopted, interim relief would function as follows:³⁰

³⁰ *Id.* at VB-3 – VB-4.

**Table 3: Interim Relief with Securitization
(\$ in millions)**

Year	2022 Electric WMPMA Recorded Balance	Interim Rate Relief Percentage	Interim Rate Relief Revenue Requirement³¹
2024	\$376.5	50%	\$193.8
2025	\$193.8	50%	\$96.1

The Commission has the authority to grant rate increases prior to a final Commission determination of reasonableness.³² In so doing, the Commission considers fairness to both the utility and public, reducing the potential for rate shock, minimizing costs to customers, ensuring rate stability, and smoothing rate impacts on customers.³³ Any of those factors may be sufficient to grant interim relief.³⁴

In D.23-06-004, the Commission granted PG&E \$1.104 billion in interim rate relief for recorded costs in its Wildfire Mitigation Balancing and related accounts. The Commission found that granting the relief would save customers up to \$30 million,³⁵ and that these “direct and indirect cost savings to customers and in turn to the utility” justified interim rate relief.³⁶

³¹ Electric amounts only, excluding FF&U. SDG&E is not requesting interim relief for the amounts accrued in its gas-specific accounts. Interim Rate Relief revenue requirement may not equal 50% due to accrued interest.

³² D.23-06-004 at 28, Conclusion of Law (CoL) 2 (“In *TURN v. PUC*, the California Supreme Court held that the Commission could set interim rates as long as the rate is subject to refund and sufficiently justified.”) (citing *TURN v. PUC*, 44 Cal.3d 870 (1988)).

³³ D.20-10-026 at 25-26 (citations omitted); *accord* D.23-06-004 at 10 (citations omitted).

³⁴ D.20-10-026 at 26.

³⁵ D.23-06-004 at 27, Finding of Fact 4; *see id.* at 2.

³⁶ *Id.* at 28, CoL 5.

As further discussed in SDG&E's Motion, interim rate recovery similarly here benefits customers as it will reduce the impacts of high interest rates and smooth rate impacts. As noted, SDG&E estimates that authorization of SDG&E's interim rate recovery proposal saves customers approximately \$15.6 million in costs that customers would otherwise pay. Additionally, authorizing interim rate recovery beginning in 2024 takes advantage of a year in which SDG&E does not anticipate a significant rate increase, as its GRC request remains pending and rates are generally being held stable. Thus, authorization of interim rate recovery in January 2024 avoids potential cumulative impacts of simultaneous rate increases. In fact, even assuming Commission authorization of interim rate recovery and other pending rate-related requests,³⁷ at the time of this filing SDG&E anticipates a decrease in electric rates for 2024.

Interim rate recovery also benefits SDG&E in the form of reduced undercollections and improved cash flow while the Commission considers the reasonableness of SDG&E's proposals. Finally, SDG&E's proposal does not impose any overcollection risk on customers. The amount subject to interim rate recovery is known and quantifiable at the time of SDG&E's Motion. Assuming interim rate recovery continues for two years, through 2024 and 2025, SDG&E will recover 75% of the 2022 electric undercollected balance of approximately \$376.5 million. This 75% is still less than prior interim rate recovery proposals that have received Commission

³⁷ SDG&E's preliminary annual Electric Consolidated Advice Letter, detailing its revenue requirement and rates effective January 1, 2024, will be submitted on November 15, 2023 with final rates filed December 29, 2023. See A.23-05-013, October Updates for SDG&E's 2024 ERRRA-related and sales forecast updates which reflects a 4.7% decrease to bundled system average rates; Advice Letter 4291-E for 2024 Public Purpose Program updates which reflects a 3.1% decrease to bundled system average rates; and the Transmission Owner (TO) 5 Cycle 6 July Informational Posting on SDG&E's website for preliminary 2024 Transmission revenue requirement and rates at <https://www.sdge.com/rates-and-regulations/tariff-information/ferc-tariffs> which reflects a decreased revenue requirement, which based on current authorized sales is a 2.3% decrease to bundled system average rates.

approval. And if the Commission ultimately decides that some portion of these costs were not reasonable, those amounts will be returned to customers with interest.

B. Securitization Lowers Residential Customers' Costs and Smooths Rates

Second, SDG&E will seek a ten-year securitization of the remaining authorized WMPMA revenue requirement through the issuance of a Financing Order. That is, upon the Commission's determination that SDG&E's incremental WMPMA costs are just and reasonable, SDG&E will request that the Commission authorize a financing order allowing SDG&E to recover the total authorized revenue requirement (minus any amounts previously collected through Interim Rate Recovery) through a fixed recovery charge pursuant to Public Utilities Code Section 850.1. Because the wildfire-mitigation capital-related costs and O&M expenses at issue here are related to catastrophic wildfires, Public Utilities Code Section 850.1 allows SDG&E to apply for a securitization financing order to mitigate customer bill impacts associated with the recovery of the just and reasonable wildfire mitigation costs and expenses at issue in this application.³⁸

Although a ten-year securitization would increase the overall revenue requirement collected, SDG&E's proposed financing mechanism provides a more affordable option for SDG&E's customers by mitigating rate shock. SDG&E does not receive any of the extra costs. Using a ten-year financing order to facilitate cost recovery in this scenario is akin to the higher financing costs that result from a homeowner selecting a 30-year mortgage versus a 15-year mortgage to reduce the monthly payment. The longer-term financing costs are reasonable because they make the home more affordable.

³⁸ See D.21-10-025 at 13-15 (finding that section 850 permits "securitization of both fire mitigation capital expenditures and any additional costs and expenses that are related to catastrophic wildfires.").

As noted, under a three-year amortization, a typical non-CARE residential electric customer will see a \$13.28/month bill increase in 2025 and \$12.93/month in 2026. Even with interim relief—which reduces the total costs to customers and smooths rates out by putting a portion of the costs into rates in 2024, subject to refund—non-CARE residential customers would face monthly bill increases of \$11.12, \$10.78, and \$10.42 in 2025-2027. With a three-year amortization, CARE residential electric customers would see more than an eight-dollar monthly increase in 2025-2027. And that is without even accounting for SDG&E’s GRC Track 1 Decision will likely be implemented in rates in 2025.

With securitization, by contrast, a typical non-CARE residential electric customer will only see a \$2.71/month bill increase from securitization from 2026-2035.³⁹ And because CARE and FERA customers are exempted from paying the fixed recovery charge, those customers will see *zero* bill impacts from 2026-2035 from these costs.

Overall Residential Bill Impact Comparison - Non-CARE⁴⁰

Scenario	Yrs	Total Pmt	Max \$/mo	Min \$/mo	Avg \$/mo
Securitization	12 ⁴¹	\$ 434.70	\$ 6.10	\$ 2.71	\$ 3.02
Amortization	3	\$ 465.46	\$ 13.28	\$ 12.58	\$ 12.93

Overall Residential Bill Impact Comparison - CARE

Scenario	Yrs	Total Pmt	Max \$/mo	Min \$/mo	Avg \$/mo
Securitization	12	\$ 71.11	\$ 3.96	\$ -	\$ 0.49
Amortization	3	\$ 299.80	\$ 8.56	\$ 8.10	\$ 8.33

³⁹ The Bill increases shown in 2024 and 2025 are from interim relief.

⁴⁰ Both tables include SDG&E’s interim relief proposals, as of October 27, 2023.

⁴¹ This includes two years of interim relief and 10 years of securitization. The securitization scenario “Max” numbers represent interim relief charges.

Moreover, securitization also reduces the *overall* costs for residential customers. That is, because section 850 allocates costs on an equal cents/kWh basis and exempts CARE and FERA customers from paying the fixed recovery charge associated with a financing order, a typical non-CARE residential electric customer will pay approximately \$434.70 in total payments with securitization compared with \$465.46 with a three-year amortization.

The savings for CARE and FERA customers are even greater. The typical residential CARE electric customer saves *over \$200* with securitization. The only payments that a CARE and FERA customer would make would be for interim relief in 2024 and 2025. And securitization reduces rates on a present value basis compared to a three-year amortization.⁴²

IV. AFFORDABILITY METRICS

On August 4, 2022, the Commission adopted D.22-08-023, which directs the use of the affordability metrics adopted in D.20-07-032 in Commission energy, water, and communications proceedings and further developed the tools and methodologies used to calculate the affordability metrics. D.22-08-023 also requires that SDG&E include the affordability metrics in any initial filing of a proceeding with a revenue increase estimated to exceed one percent of currently authorized revenues systemwide. Because the revenue requirement requested in this application exceeds one percent of SDG&E's currently authorized revenues, SDG&E is including the Affordability Ratio 20 (AR 20) by climate zone, Affordability Ratio 50 (AR 50) by climate zone, and the Hours at Minimum Wage (HM) associated with revenues in effect at the time of this filing.

SDG&E is also required to include essential usage bills by climate zone, underlying the affordability metrics associated with revenues in effect at the time of the filing; and for climate

⁴² See Bille Direct at VB-11 – VB-18.

zones with Areas of Affordability Concern (AAC) as defined in the most recent annual Affordability Report, AR 20 by climate zones subdivided by Public Use Microdata Area.⁴³ In addition, SDG&E must introduce the aforementioned metrics along with the changes in the AR 20 by climate zone, AR 50 by climate zone, and HM associated with the proposed new revenue requirement requested annually for each year in which the new revenues are proposed.⁴⁴ The testimony of Ms. Evelyn Luna addresses the required affordability metrics as well as supplemental analysis performed by SDG&E.

To illustrate the value of its Affordability Proposal, SDG&E used two scenarios to calculate the required affordability metrics. The Baseline Scenario assumes SDG&E's definition of "traditional rate recovery," namely no interim rate recovery and a three-year amortization of the requested WMPMA revenue requirement, as anticipated by D.22-05-001.⁴⁵ As there would be no rate impact in 2024 under the Baseline Scenario, affordability metrics are provided for 2025-2027.⁴⁶ The Affordability Proposal Scenario assumes authorization of interim rate relief in 2024 and 2025, and securitization of the remaining authorized revenue requirement from 2026-2036. Therefore, the Affordability Proposal Scenario provides impacts for the years 2024-2027.

V. RELIEF REQUESTED

SDG&E respectfully requests that the Commission take the following actions:

- Find SDG&E's recorded WMPMA balances for wildfire mitigation costs and expenses incurred from May 30, 2019 through December 31, 2022 just and reasonable, and incremental;
- Authorize SDG&E's incremental WMPMA balance for recovery in rates;

⁴³ D.22-08-023 at 84, Ordering Paragraph (OP) 5.

⁴⁴ *Id.* at 84-85, OP 6.

⁴⁵ D.22-05-001 at 18.

⁴⁶ SDG&E's analysis ends in 2027, as that is the farthest year out for the Commission's calculator.

- Approve the revenue requirement for wildfire capital investments from May 30, 2019 through December 31, 2022 for SDG&E's TY 2024 GRC period, 2024-2027;
- Consider SDG&E's Affordability Proposals, consisting of Interim Rate Recovery and securitization of wildfire costs, to smooth rate impacts and promote affordability, and authorize SDG&E's proposals in the appropriate forum.

VI. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rule 2.1 (a) – (c)

This application is made pursuant to Sections 451, 850.1, and 8386 *et. seq.* of the California Public Utilities Code, the Commission's Rules of Practice and Procedure, and relevant decisions, orders, and resolutions of the Commission, including D.17-12-024, D.19-05-039, D.19-09-051, D.22-05-001, and the Assigned Commissioner's Scoping Memorandum in the instant proceeding. In accordance with Rule 2.1 (a) – (c) of the Commission's Rules of Practice and Procedure, SDG&E provides the following information.

1. Rule 2.1 (a) - Legal Name

SDG&E is a corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. SDG&E's principal place of business is 8330 Century Park Court, San Diego, California 92123.

2. Rule 2.1 (b) - Correspondence

Correspondence or communications regarding this Application should be addressed to:

Will Fuller
General Rate Case Program Manager
SAN DIEGO GAS & ELECTRIC COMPANY
8330 Century Park Court
San Diego, CA 92123
Telephone: (858) 654-1885
Email: wfuller@sdge.com

with copies to:

Laura M. Fulton
8330 Century Park Court, CP32D
San Diego, California 92123
Telephone: (858) 654-1759
Facsimile: (619) 699-5027
Email: lfulton@sdge.com

3. Rule 2.1 (c)

a. Proposed Category of Proceeding

SDG&E proposes that this Application be categorized as ratesetting under Rule 1.3(e).

b. Need for Hearings

While SDG&E submits that an evidentiary hearing is not necessary based on the record submitted, it is possible that an evidentiary hearing may be deemed necessary to address questions of material fact pertaining to its request. SDG&E proposes dates in the procedural schedule below, consistent with the schedule previously provided by the Assigned Administrative Law Judge.

1. Issues to be Considered and Relevant Safety Considerations

The primary issues to be considered in this application include:

- The reasonableness and incrementality of SDG&E's wildfire mitigation costs and expenses recorded to SDG&E's WMPMAs from May 30, 2019 through December 31, 2022.
- The reasonableness of the capital-related revenue requirement for authorized wildfire mitigation costs for the period covering SDG&E's TY 2024 GRC, 2024-2027.
- The reasonableness of SDG&E's proposed cost recovery mechanisms, including Interim Rate Recovery and SDG&E's request to subsequently submit a financing order to securitize the revenue requirement authorized by a final decision in this Track 2 proceeding.

With respect to relevant safety considerations, SDG&E’s request supports the safety of its customers, employees, and communities because it facilitates wildfire mitigation investments necessary to reduce the risk of catastrophic events.

2. Proposed Schedule

The Commission has already adopted a schedule for this Track 2, as set forth below:

Activity	Date
SDG&E Testimony Served	October 27, 2023 ⁴⁷
Intervenor Testimony Served	March 15, 2024
Rebuttal Testimony Served	April 15, 2024
Evidentiary Hearings (if necessary)	May 13 to May 15, 2024
Opening Briefs Filed	June 7, 2024
Reply Briefs Filed	June 21, 2024
Proposed Decision (recommended)	September 1, 2024

Consistent with Public Utilities Code Section 8386.4, SDG&E requests that the Commission issue a final decision in this case no later than November 6, 2024. SDG&E has provided a recommended date for a Proposed Decision consistent with this schedule.

A. Articles of Incorporation

A copy of SDG&E’s Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State was filed with the Commission on September 10, 2014 in connection with SDG&E’s Application (A.) 14-09-008 and is incorporated herein by reference.

⁴⁷ Actual service date. The revised Track 2 procedural schedule, as provided in the September 12, 2023 email ruling of ALJ Lakhanpal, extended SDG&E’s testimony deadline to November 6, 2023. SDG&E does not request any changes to the proposed schedule based on the earlier filing date.

B. Rule 3.2 (a) – (d)⁴⁸

1. Rule 3.2 (a) (1) – Balance Sheet

SDG&E's financial statement, balance sheet, and income statement are included with this Application as Attachment A.

2. Rule 3.2 (a) (2) – Statement of Effective Rates

A statement of all of SDG&E's presently effective electric rates can be viewed electronically by accessing www.sdge.com/regulatory/tariff/current_tariffs.shtml. A copy is attached hereto as Attachment B.

3. Rule 3.2 (a) (3) – Statement of Proposed Rates

SDG&E's Statement of Proposed Rates is attached as Attachment C.

4. Rule 3.2 (a) (4) – Description of Property and Equipment

A general description of SDG&E's property and equipment was filed with the Commission on October 5, 2001, in connection with Application 01-10-005, and is incorporated herein by reference. A statement of Original Cost and Depreciation Reserve ending March 31, 2023 is attached as Attachment D.

5. Rule 3.2 (a) (5) and (6) – Summary of Earnings

A summary of SDG&E's earnings (for the total utility operations for the company) is included as Attachment E to this Application.

6. Rule 3.2 (a) (7) – Statement re Tax Depreciation

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis, at rates based on the estimated useful lives of plant properties. For federal income tax purposes, SDG&E has computed its tax depreciation for years after 1986

⁴⁸ Rule 3.2(a) (9) is not applicable to this Application.

using the Modified Accelerated Cost Recovery Systems and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

7. Rule 3.2 (a) (8) – Proxy Statement

A copy of SDG&E’s most recent proxy statement, dated March 29, 2023 was provided to the California Public Utilities Commission on April 9, 2023, and is incorporated herein by reference.

8. Rule 3.2 (a) (10) – Statement Re Pass Through to Customers

This application both reallocates costs among customer classes as well as passes through to customers of SDG&E the costs for the services provided as authorized by the Commission.

9. Rule 3.2(b) - (d) – Service and Notice

SDG&E is serving this application and testimony (via filed and served notice of availability) on all parties to A.22-05-015 and A.22-05-016 (consolidated). Within 20 days of filing, SDG&E will mail notice of this application to the State of California and to cities and counties served by SDG&E in its service territory and to all those persons listed in Attachment F to this Application and will post the notice in their offices and publish the notice in newspapers of general circulation in each county in their service territories.

VII. CONCLUSION

SDG&E requests that the Commission grant SDG&E's Application.

Respectfully submitted,

/s/ Laura M. Fulton

8330 Century Park Court

San Diego, CA 92123

Telephone: (858) 654-1759

Facsimile: (619) 699-5027

Email: lfulton@sdge.com

Attorney for

SAN DIEGO GAS & ELECTRIC COMPANY

October 27, 2023

SAN DIEGO GAS & ELECTRIC COMPANY

/s/ Valerie A. Bille

Valerie A. Bille

San Diego Gas & Electric Company

Vice President, Controller, and Chief Accounting Officer

DATED at San Diego, this 27th day of October, 2023

OFFICER VERIFICATION

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on behalf of San Diego Gas & Electric Company. The matters stated in the foregoing application are true to my own knowledge, except as to matters that are stated therein on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 27th day of October 2023, at San Diego, California.

By: /s/ Valerie A. Bille
Valerie A. Bille
San Diego Gas & Electric Company
Vice President, Controller, and Chief Accounting Officer

CEO Attestation - Caroline Winn

ASSEMBLY BILL 1054 CERTIFICATION (PUB. UTIL. CODE SECTION 8386.4)

1. I am the Chief Executive Officer of San Diego Gas & Electric Company (SDG&E).
2. After reasonable inquiry, I am informed and believe, and upon such information and belief, certify that SDG&E has not, in a previous proceeding, received authorization from the California Public Utilities Commission to recover the costs of the activities described in SDG&E's Wildfire Mitigation Plans (WMP) that are sought in SDG&E's Submission and Supplemental Testimony Supporting its Track 2 Request to Authorize Recovery of Incremental Wildfire Mitigation Costs Incurred from 2019-2022 (Track 2 Submission).
3. SDG&E established its Wildfire Mitigation Plan Memorandum Account (WMPMA) to record SDG&E's costs to implement its approved WMP initiatives and activities. Prior to the filing of this GRC, the Commission has not reviewed for reasonableness, nor has it authorized the recovery of the WMPMA balance associated with SDG&E's WMP activities and tracked in the account.
4. In its Track 2 Submission, SDG&E is requesting an after the fact reasonableness review of the incremental wildfire-mitigation related costs recorded in SDG&E's WMPMA from 2019 through 2022, as well as authorization to recover the total incremental revenue requirement associated with SDG&E's wildfire mitigation costs from May 30, 2019, through December 31, 2022. The costs SDG&E is seeking to recover in this GRC are incremental to amounts authorized by the Commission for wildfire mitigation activities in SDG&E's Test Year 2019 GRC (Application 17-10-007). These amounts are also not addressed in Track 1 of SDG&E's Test Year 2024 GRC (A.22-05-016).
5. SDG&E is presenting testimony reflecting its reasoned position on which costs are incremental, but I recognize that whether a particular cost is incremental may be contested and that the Commission will make the ultimate determination. My certification therefore reflects my belief that SDG&E's position on which costs are eligible for rate recovery is reasonable and based on SDG&E's interpretation and understanding of California Public Utilities Code Section 8386.4 and information from SDG&E employees on whom I rely for their knowledge about the details of these issues.

Executed on October 27, 2022, at San Diego, California.



Caroline Winn
Chief Executive Officer
San Diego Gas & Electric Company

ATTACHMENT A

BALANCE SHEET, INCOME STATEMENT AND FINANCIAL STATEMENT

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
Mar 2023

1. UTILITY PLANT		2023
101	UTILITY PLANT IN SERVICE	\$ 25,203,107,476
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	112,194,000
105	PLANT HELD FOR FUTURE USE	-
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	2,021,918,445
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(7,612,572,095)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(909,614,028)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(2,813,040)
118	OTHER UTILITY PLANT	2,247,013,078
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(470,687,740)
120	NUCLEAR FUEL - NET	-
	TOTAL NET UTILITY PLANT	\$ 20,592,296,818
2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	\$ 6,003,644
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(326,049)
158	NON-CURRENT PORTION OF ALLOWANCES	216,237,828
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	863,886,660
175	LONG-TERM PORTION OF DERIVATIVE ASSETS	22,890,026
	TOTAL OTHER PROPERTY AND INVESTMENTS	\$ 1,108,692,109

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
Mar 2023

3. CURRENT AND ACCRUED ASSETS

		2023
131	CASH	\$ 276,915,017
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	-
136	TEMPORARY CASH INVESTMENTS	58,800,000
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	851,861,560
143	OTHER ACCOUNTS RECEIVABLE	123,632,484
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(79,959,721)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	(2)
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	152,275,443
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	237,928,711
158	LESS: NON-CURRENT PORTION OF ALLOWANCES	(216,237,828)
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	570,284
165	PREPAYMENTS	124,465,523
171	INTEREST AND DIVIDENDS RECEIVABLE	2,424,617
173	ACCRUED UTILITY REVENUES	80,670,514
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	53,963,448
175	DERIVATIVE INSTRUMENT ASSETS	123,612,212
175	LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(22,890,026)
	TOTAL CURRENT AND ACCRUED ASSETS	\$ 1,768,032,236

4. DEFERRED DEBITS

181	UNAMORTIZED DEBT EXPENSE	\$ 57,956,198
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	3,257,991,594
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	601,559
184	CLEARING ACCOUNTS	694,131
185	TEMPORARY FACILITIES	139,027
186	MISCELLANEOUS DEFERRED DEBITS	349,686,200
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	5,514,252
190	ACCUMULATED DEFERRED INCOME TAXES	182,851,266
	TOTAL DEFERRED DEBITS	3,855,434,227
	TOTAL ASSETS AND OTHER DEBITS	\$ 27,324,455,390

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
Mar 2023

5. PROPRIETARY CAPITAL

		2023
201	COMMON STOCK ISSUED	\$ 291,458,395
204	PREFERRED STOCK ISSUED	-
207	PREMIUM ON CAPITAL STOCK	591,282,978
210	GAIN ON RETIRED CAPITAL STOCK	-
211	MISCELLANEOUS PAID-IN CAPITAL	802,165,368
214	CAPITAL STOCK EXPENSE	(24,605,640)
216	UNAPPROPRIATED RETAINED EARNINGS	7,670,831,749
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	(7,061,290)
	TOTAL PROPRIETARY CAPITAL	\$ 9,324,071,560

6. LONG-TERM DEBT

221	BONDS	\$ 8,200,000,000
223	ADVANCES FROM ASSOCIATED COMPANIES	-
224	OTHER LONG-TERM DEBT	400,000,000
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(27,984,500)
	TOTAL LONG-TERM DEBT	\$ 8,572,015,500

7. OTHER NONCURRENT LIABILITIES

227	OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	\$ 1,450,179,387
228.2	ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	20,638,416
228.3	ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	42,547,000
228.4	ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244	LONG TERM PORTION OF DERIVATIVE LIABILITIES	4,783,503
230	ASSET RETIREMENT OBLIGATIONS	885,415,764
	TOTAL OTHER NONCURRENT LIABILITIES	\$ 2,403,564,070

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
Mar 2023

8. CURRENT AND ACCRUED LIABILITIES

		2023
231	NOTES PAYABLE	\$ -
232	ACCOUNTS PAYABLE	641,349,033
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	142,887,990
235	CUSTOMER DEPOSITS	36,479,378
236	TAXES ACCRUED	77,557,761
237	INTEREST ACCRUED	84,927,654
238	DIVIDENDS DECLARED	-
241	TAX COLLECTIONS PAYABLE	9,189,394
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	174,604,289
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	72,739,237
244	DERIVATIVE INSTRUMENT LIABILITIES	11,771,515
244	LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES	(4,783,503)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
		-
	TOTAL CURRENT AND ACCRUED LIABILITIES	\$ 1,246,722,748

9. DEFERRED CREDITS

252	CUSTOMER ADVANCES FOR CONSTRUCTION	\$ 118,660,356
253	OTHER DEFERRED CREDITS	547,270,252
254	OTHER REGULATORY LIABILITIES	2,320,381,233
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	51,644,241
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	2,108,917,363
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	631,208,067
		631,208,067
	TOTAL DEFERRED CREDITS	5,778,081,512
	TOTAL LIABILITIES AND OTHER CREDITS	\$ 27,324,455,390

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Mar 2023

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$	1,854,758,561
401	OPERATING EXPENSES	1,138,216,583		
402	MAINTENANCE EXPENSES	84,599,892		
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	255,960,316		
408.1	TAXES OTHER THAN INCOME TAXES	59,422,454		
409.1	INCOME TAXES	15,922,935		
410.1	PROVISION FOR DEFERRED INCOME TAXES	37,845,292		
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(31,902,718)		
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(19,128,969)		
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-		
	TOTAL OPERATING REVENUE DEDUCTIONS			1,540,935,785
	NET OPERATING INCOME			313,822,776

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-		
417	REVENUES OF NONUTILITY OPERATIONS	-		
417.1	EXPENSES OF NONUTILITY OPERATIONS	(2,162,594)		
418	NONOPERATING RENTAL INCOME	9,909		
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-		
419	INTEREST AND DIVIDEND INCOME	19,722,667		
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	23,068,487		
421	MISCELLANEOUS NONOPERATING INCOME	24,255		
421.1	GAIN ON DISPOSITION OF PROPERTY	-		
	TOTAL OTHER INCOME	40,662,724		
421.2	LOSS ON DISPOSITION OF PROPERTY	-		
425	MISCELLANEOUS AMORTIZATION	62,512		
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	8,335,187		
	TOTAL OTHER INCOME DEDUCTIONS	\$ 8,397,699		
408.2	TAXES OTHER THAN INCOME TAXES	226,484		
409.2	INCOME TAXES	1,871,707		
410.2	PROVISION FOR DEFERRED INCOME TAXES	21,931,039		
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(19,959,352)		
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	\$ 4,069,878		
	TOTAL OTHER INCOME AND DEDUCTIONS			\$ 28,195,147
	INCOME BEFORE INTEREST CHARGES			342,017,923
	EXTRAORDINARY ITEMS AFTER TAXES			-
	NET INTEREST CHARGES*			84,333,052
	NET INCOME			\$ 257,684,871

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$7,500,671)

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
Mar 2023

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$ 7,413,146,878
NET INCOME (FROM PRECEDING PAGE)	257,684,871
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	-
DIVIDENDS DECLARED - COMMON STOCK	-
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	<u>\$ 7,670,831,749</u>

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
March 31, 2023

(a) Amounts and Kinds of Stock Authorized:			
Common Stock	255,000,000	shares	Without Par Value
Amounts and Kinds of Stock Outstanding:			
Common Stock	116,583,358	shares	291,458,395

(b) Brief Description of Mortgage:

Full information as to this item is given in Decision Nos. 93-09-069, 04-01-009, 06-05-015, 08-07-029, 10-10-023, 12-03-005, 15-08-011, 18-02-012, 20-04-015, and 22-12-011 to which references are hereby made.

(c) Number and Amount of Bonds Authorized and Issued:

First Mortgage Bonds:	Nominal Date of Issue	Par Value		Interest Paid as of Q4' 2022
		Authorized and Issued	Outstanding	
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	15,312,500
6.00% Series GGG, due 2039	05-14-09	300,000,000	300,000,000	18,000,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	13,375,000
4.50% Series III, due 2040	08-26-10	500,000,000	500,000,000	22,500,000
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	9,875,000
4.30% Series MMM, due 2042	03-22-12	250,000,000	250,000,000	10,750,000
3.60% Series NNN, due 2023	09-09-13	450,000,000	450,000,000	16,200,000
1.9140% Series PPP, due 2022	03-12-15	0	0	170,911
2.50% Series QQQ, due 2026	05-19-16	500,000,000	500,000,000	12,500,000
3.75% Series RRR, due 2047	06-08-17	400,000,000	400,000,000	15,000,000
4.15% Series SSS, due 2048	05-17-18	400,000,000	400,000,000	16,600,000
4.10% Series TTT, due 2049	05-31-19	400,000,000	400,000,000	16,400,000
3.32% Series UUU, due 2050	04-07-20	400,000,000	400,000,000	13,280,000
1.70% Series VVV, due 2030	09-28-20	800,000,000	800,000,000	13,600,000
2.95% Series WWW, due 2051	08-13-21	750,000,000	750,000,000	22,247,917
3.00% Series XXX, due 2032	03-11-22	500,000,000	500,000,000	7,666,667
3.70% Series YYY, due 2052	03-11-22	500,000,000	500,000,000	9,455,556
5.35% Series ZZZ, due 2053	03-10-23	800,000,000	800,000,000	
Total First Mortgage Bonds:		8,200,000,000	8,200,000,000	261,308,551
Total Bonds:				
				261,308,551
Variable Term Loan, due 2024 (5.17% at 3/31/2023)	02-18-22 and 05-18-22	400,000,000	400,000,000	5,866,690
TOTAL LONG-TERM DEBT		8,600,000,000	8,600,000,000	267,175,241

**SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT**

March 31, 2023

Other Indebtedness	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid as of Q4' 2022
Commercial Paper & ST Bank Loans	Various	Various	Various	-	\$1,150,930

Amounts and Rates of Dividends Declared:

The amounts and rates of dividends during the past five fiscal years are as follows:

Preferred Stock	Shares Outstanding	2018	2019	2020	2021	2022
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
Total	-	-	-	-	-	-

Common Stock		2018	2019	2020	2021	2022
Dividend to Parent	[1]	250,000,000	-	200,000,000	300,000,000	100,000,000

[1] San Diego Gas & Electric Company dividend to parent.

ATTACHMENT B
STATEMENT OF PRESENT RATES



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Sheet 1

The following sheets contain all the effective rates and rules affecting rates, service and information relating thereto, in effect on the date indicated herein.

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Advice Ltr. No. 3421-E

Decision No. _____

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Submitted Aug 15, 2019

Effective Sep 16, 2019

Resolution No. _____



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16C15

Advice Ltr. No. 3292-E

Decision No. _____

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Submitted Nov 1, 2018

Effective _____

Resolution No. _____

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106-1959A	05-71	Absolving Service Agreement, Service from Temporary Facilities.....	1255-G
106-2659	06-68	Contract for Natural Gas Service Supplied by a Liquefied Natural Gas Installation, (Borrego Springs).....	1082-G
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106-5140A	---	Agreement for _____ Service.....	2097-G
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Advice Ltr. No. 3115-G

Decision No. A.21-11-017

Issued by
Dan Skopec
Vice President
Regulatory Affairs

Submitted Sep 9, 2022
Effective Sep 9, 2022
Resolution No.

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San Diego Gas & Electric Company
San Diego, California

Revised Cal. P.U.C. Sheet No. 19182-G

Canceling Revised Cal. P.U.C. Sheet No. 15760-G

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Advice Ltr. No. 2087-G

Decision No. _____

Issued by
Lee Schavrien
Senior Vice President

Date Filed Jan 19, 2012

Effective Feb 15, 2012

Resolution No. _____

ATTACHMENT C
STATEMENT OF PROPOSED RATES

Proposed Electric Delivery Rate Increase¹

Line No.	Customer Class	Current Rates 1/1/2023 ² (£/kWh)	Proposed 2024 (£/kWh)	2023 to 2024 Change		Proposed 2025 (£/kWh)	2024 to 2025 Change		Proposed 2026 (£/kWh)	2025 to 2026 Change		Proposed 2027-2035 (£/kWh)	2026 to 2027-2035 Change	
				(£/kWh)	%		(£/kWh)	%		(£/kWh)	%		(£/kWh)	%
1	Residential	20.710	22.232	1.522	7.3%	21.465	-0.767	-3.4%	21.266	-0.199	-0.9%	21.266	0.000	0.0%
2	Small Comm.	22.807	24.265	1.458	6.4%	23.530	-0.735	-3.0%	23.517	-0.013	-0.1%	23.517	0.000	0.0%
3	Med & Lg C&I	17.165	18.003	0.838	4.9%	17.580	-0.423	-2.3%	17.874	0.294	1.7%	17.874	0.000	0.0%
4	Agriculture	14.064	14.927	0.863	6.1%	14.492	-0.435	-2.9%	14.775	0.283	2.0%	14.775	0.000	0.0%
5	Lighting	21.784	23.499	1.715	7.9%	22.635	-0.864	-3.7%	22.495	-0.140	-0.6%	22.495	0.000	0.0%
6	System Total	18.999	20.150	1.151	6.1%	19.570	-0.580	-2.9%	19.649	0.079	0.4%	19.649	0.000	0.0%

¹ Includes SDG&E's interim relief and securitization proposals.

² Rates Effective 1/1/23 per Advice Letter (AL) 4129-E.

Proposed Total Electric Rate Increase¹

Line No.	Customer Class	Current Rates 1/1/2023 ² (£/kWh)	Proposed 2024 (£/kWh)	2023 to 2024 Change		Proposed 2025 (£/kWh)	2024 to 2025 Change		Proposed 2026 (£/kWh)	2025 to 2026 Change		Proposed 2027-2035 (£/kWh)	2026 to 2027-2035 Change	
				(£/kWh)	%		(£/kWh)	%		(£/kWh)	%		(£/kWh)	%
1	Residential	40.375	41.897	1.522	3.8%	41.130	-0.767	-1.8%	40.931	-0.199	-0.5%	40.931	0.000	0.0%
2	Small Comm.	40.224	41.682	1.458	3.6%	40.947	-0.735	-1.8%	40.934	-0.013	0.0%	40.934	0.000	0.0%
3	Med & Lg C&I	37.553	38.391	0.838	2.2%	37.968	-0.423	-1.1%	38.262	0.294	0.8%	38.262	0.000	0.0%
4	Agriculture	28.614	29.477	0.863	3.0%	29.042	-0.435	-1.5%	29.325	0.283	1.0%	29.325	0.000	0.0%
5	Lighting	34.644	36.359	1.715	5.0%	35.495	-0.864	-2.4%	35.355	-0.140	-0.4%	35.355	0.000	0.0%
6	System Total	38.471	39.622	1.151	3.0%	39.042	-0.580	-1.5%	39.121	0.079	0.2%	39.121	0.000	0.0%

¹ Includes SDG&E's interim relief and securitization proposals.

² Rates Effective 1/1/23 per Advice Letter (AL) 4129-E.

Proposed Gas Transportation Rate Increase

	At Present Rates				At Proposed Rates				Changes		
	Aug-1-23 Volumes mtherms	Average Rate \$/therm	Aug-1-23 Revenues \$000's	2025 Volumes mtherms	Average Rate \$/therm	2025 Revenues \$000's	2025 Revenues \$000's	Revenues \$000's	Rates \$/therm	Rate change %	
	A	B	C	D	E	F	G	H	I		
<u>CORE</u>											
1 Residential	313,234	\$1.65080	\$517,088	313,234	\$1.68324	\$527,247	\$10,160	\$0.03243	2.0%		
2 Commercial & Industrial	194,777	\$0.68042	\$132,530	194,777	\$0.68914	\$134,229	\$1,699	\$0.00872	1.3%		
3											
4											
5 NGV - Pre Sempra-Wide	24,129	\$0.42889	\$10,348	24,129	\$0.43192	\$10,422	\$73	\$0.00303	0.7%		
6 Sempra-Wide Adjustment	24,129	(\$0.09732)	(\$2,348)	24,129	(\$0.09998)	(\$2,412)	(\$64)	(\$0.00267)	2.7%		
7 NGV Post Sempra-Wide	24,129	\$0.33157	\$8,000	24,129	\$0.33193	\$8,009	\$9	\$0.00036	0.1%		
8											
9											
10 Total CORE	532,140	\$1.23580	\$657,618	532,140	\$1.25810	\$669,485	\$11,867	\$0.02230	1.8%		
11											
<u>NONCORE COMMERCIAL & INDUSTRIAL</u>											
12 Distribution Level Service	29,376	\$0.29000	\$8,519	29,376	\$0.29266	\$8,597	\$78	\$0.00266	0.9%		
13 Transmission Level Service (2)	17,569	\$0.05194	\$913	17,569	\$0.05198	\$913	\$1	\$0.00004	0.1%		
14											
15 Total Noncore C&I	46,945	\$0.20090	\$9,431	46,945	\$0.20258	\$9,510	\$79	\$0.00168	0.8%		
16											
<u>NONCORE ELECTRIC GENERATION</u>											
17 Distribution Level Service											
18 Pre Sempra-Wide	68,867	\$0.21124	\$14,547	68,867	\$0.21308	\$14,674	\$127	\$0.00184	0.9%		
19 Sempra-Wide Adjustment	68,867	(\$0.00383)	(\$264)	68,867	(\$0.00532)	(\$367)	(\$103)	(\$0.00149)	38.9%		
20											
21 Distribution Level post SW	68,867	\$0.20741	\$14,284	68,867	\$0.20776	\$14,308	\$24	\$0.00035	0.2%		
22 Transmission Level Service (2)	461,363	\$0.04846	\$22,357	461,363	\$0.04849	\$22,374	\$16	\$0.00004	0.1%		
23 Total Electric Generation	530,230	\$0.06910	\$36,641	530,230	\$0.06918	\$36,682	\$41	\$0.00008	0.1%		
24											
25 TOTAL NONCORE	577,175	\$0.07982	\$46,072	577,175	\$0.08003	\$46,192	\$119	\$0.00021	0.3%		
26											
27 SYSTEM TOTAL	1,109,315	\$0.63435	\$703,690	1,109,315	\$0.64515	\$715,677	\$11,987	\$0.01081	1.7%		

1) These rates are for Natural Gas Transportation Service from "Citygate to Meter." The Backbone Transportation Service (BTS) rate is for service from Receipt Point to Citygate. The BTS rate is a SoCalGas tariff and service is purchased from SoCalGas.

2) The average Transmission Level Service (TLS) rate is shown here.

3) All rates include Franchise Fees & uncollectible charges.

ATTACHMENT D

COST OF PROPERTY AND DEPRECIATION RESERVE

SAN DIEGO GAS & ELECTRIC COMPANY
COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETO
AS OF MARCH 31, 2023

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
ELECTRIC DEPARTMENT			
302	Franchises and Consents	222,841.36	202,900.30
303	Misc. Intangible Plant	120,460,667.65	74,060,753.52
	Intangible Contra Accounts	(979,446.23)	(910,416.50)
	TOTAL INTANGIBLE PLANT	<u>119,704,062.78</u>	<u>73,353,237.32</u>
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	91,920,534.66	60,954,053.51
312	Boiler Plant Equipment	166,251,061.04	110,467,061.67
314	Turbogenerator Units	135,485,142.34	76,025,405.94
	Palomar Contra E-314	(772,160.26)	(382,770.26)
315	Accessory Electric Equipment	87,414,248.69	60,381,079.92
316	Miscellaneous Power Plant Equipment	69,893,958.50	26,759,996.29
	Palomar Contra E-316	(849,751.57)	(380,962.61)
	TOTAL STEAM PRODUCTION	<u>563,869,551.69</u>	<u>333,870,382.75</u>
340.1	Land	224,368.91	0.00
340.2	Land Rights	2,427.96	2,427.96
341	Structures and Improvements	24,895,662.62	14,878,130.08
342	Fuel Holders, Producers & Accessories	21,651,513.75	12,259,905.80
343	Prime Movers	94,666,257.32	64,013,427.47
344	Generators	344,028,655.65	186,906,976.75
345	Accessory Electric Equipment	33,070,154.31	21,498,179.01
346	Miscellaneous Power Plant Equipment	70,597,480.78	27,697,219.87
	TOTAL OTHER PRODUCTION	<u>589,136,521.30</u>	<u>327,256,266.94</u>
	TOTAL ELECTRIC PRODUCTION	<u>1,153,006,072.99</u>	<u>661,126,649.69</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	84,220,079.84	0.00
350.2	Land Rights	172,985,091.60	32,628,145.29
350.2	Camp Pendleton Easement top-side	517,000.00	0.00
352	Structures and Improvements	820,819,591.39	143,866,209.81
353	Station Equipment	2,288,365,569.69	620,404,743.01
354	Towers and Fixtures	930,816,724.99	283,289,082.54
355	Poles and Fixtures	1,132,221,134.86	218,740,974.97
356	Overhead Conductors and Devices	958,592,622.05	313,217,635.85
357	Underground Conduit	635,070,565.00	118,483,355.10
358	Underground Conductors and Devices	612,095,974.23	118,119,701.64
359	Roads and Trails	391,916,730.47	63,521,095.47
	TOTAL TRANSMISSION	8,027,621,084.12	1,912,270,943.68
360.1	Land	17,456,813.30	0.00
360.2	Land Rights	100,873,085.41	53,229,670.56
361	Structures and Improvements	13,216,401.83	3,197,652.00
362	Station Equipment	687,214,050.31	319,304,631.99
363	Storage Battery Equipment	218,097,551.41	95,612,309.98
364	Poles, Towers and Fixtures	1,149,903,063.38	317,413,682.33
365	Overhead Conductors and Devices	1,367,068,766.74	279,734,243.23
366	Underground Conduit	1,874,861,207.97	661,952,442.07
367	Underground Conductors and Devices	2,221,877,246.06	1,097,201,120.90
368.1	Line Transformers	819,540,842.32	318,792,432.75
368.2	Protective Devices and Capacitors	41,008,875.65	21,673,244.06
369.1	Services Overhead	369,541,143.45	104,861,176.22
369.2	Services Underground	433,545,130.63	295,523,099.79
370.1	Meters	222,118,988.66	155,928,521.99
370.2	Meter Installations	82,752,581.53	44,726,913.79
371	Installations on Customers' Premises	80,149,385.65	39,897,832.97
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	39,705,257.31	25,455,497.65
		0.00	(7,902,479.71)
	TOTAL DISTRIBUTION PLANT	9,738,930,391.61	3,826,601,992.57
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	45,469,034.54	31,168,479.38
392.1	Transportation Equipment - Autos	0.00	0.00
392.2	Transportation Equipment - Trailers	58,145.67	29,516.83
393	Stores Equipment	46,031.37	8,699.55
394.1	Portable Tools	41,980,009.87	14,522,564.98
394.2	Shop Equipment	278,147.42	242,691.39
395	Laboratory Equipment	5,471,512.08	1,999,959.88
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	471,948,864.49	199,672,810.59
398	Miscellaneous Equipment	3,161,108.74	1,557,290.54
	TOTAL GENERAL PLANT	575,785,525.65	249,319,514.81
101	TOTAL ELECTRIC PLANT	19,615,047,137.15	6,722,672,338.07

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
GAS PLANT			
302	Franchises and Consents	86,104.20	86,104.20
303	Miscellaneous Intangible Plant	0.00	0.00
	TOTAL INTANGIBLE PLANT	86,104.20	86,104.20
360.1	Land	0.00	0.00
361	Structures and Improvements	0.00	0.00
362.1	Gas Holders	0.00	0.00
362.2	Liquefied Natural Gas Holders	0.00	0.00
363	Purification Equipment	0.00	0.00
363.1	Liquefaction Equipment	0.00	0.00
363.2	Vaporizing Equipment	0.00	0.00
363.3	Compressor Equipment	0.00	0.00
363.4	Measuring and Regulating Equipment	0.00	0.00
363.5	Other Equipment	0.00	0.00
363.6	LNG Distribution Storage Equipment	2,168,803.11	1,610,139.37
	TOTAL STORAGE PLANT	2,168,803.11	1,610,139.37
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	3,514,781.26	1,800,231.58
366	Structures and Improvements	23,348,918.49	12,828,354.78
367	Mains	695,726,962.21	121,548,196.44
368	Compressor Station Equipment	129,440,078.03	80,052,259.86
369	Measuring and Regulating Equipment	30,673,336.02	20,176,188.95
371	Other Equipment	2,845,770.57	521,209.94
	TOTAL TRANSMISSION PLANT	890,198,990.33	236,926,441.55
374.1	Land	1,514,272.84	0.00
374.2	Land Rights	8,529,390.40	7,727,958.37
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	1,632,162,324.39	498,337,394.03
376	Top-side retirement adjustment	0.00	0.00
378	Measuring & Regulating Station Equipment	21,248,484.85	10,808,342.03
380	Distribution Services	646,684,540.01	323,215,807.26
380	Top-side retirement adjustment	0.00	0.00
381	Meters and Regulators	197,611,490.38	93,836,853.51
382	Meter and Regulator Installations	141,534,418.03	58,513,490.79
385	Ind. Measuring & Regulating Station Equipment	1,516,810.70	1,382,957.33
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	10,562,291.51	6,703,928.15
	TOTAL DISTRIBUTION PLANT	2,661,407,470.02	1,000,587,984.57

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	0.00	0.00
392.2	Transportation Equipment - Trailers	0.00	0.00
394.1	Portable Tools	26,668,794.86	6,338,269.16
394.2	Shop Equipment	42,767.98	14,661.40
395	Laboratory Equipment	0.00	0.00
396	Power Operated Equipment	0.00	0.00
397	Communication Equipment	2,250,976.16	1,313,771.27
398	Miscellaneous Equipment	1,292,400.41	256,606.88
	TOTAL GENERAL PLANT	<u>30,254,939.41</u>	<u>7,923,308.71</u>
101	TOTAL GAS PLANT	<u>3,584,116,307.07</u>	<u>1,247,133,978.40</u>
COMMON PLANT			
303	Miscellaneous Intangible Plant	18,348,391.47	3,432,876.71
303	Miscellaneous Intangible Plant	983,126,338.67	463,936,344.03
	Common Contra Account	(4,128,951.21)	(3,064,925.64)
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,494,796.01	0.00
389.2	Land Rights	27,776.34	27,776.34
390	Structures and Improvements	603,310,450.47	218,162,044.56
391.1	Office Furniture and Equipment - Other	44,245,505.27	16,863,952.75
	Common Contra Account	0.00	0.00
391.2	Office Furniture and Equipment - Computer E	121,844,050.24	63,497,890.67
	Common Contra Account	(19,579.43)	(18,758.99)
392.1	Transportation Equipment - Autos	406,252.33	318,617.74
392.2	Transportation Equipment - Trailers	107,977.72	25,621.13
392.3	Transportation Equipment - Aviation	28,270,505.16	6,397,263.75
393	Stores Equipment	332,982.68	92,545.66
394.1	Portable Tools	1,520,840.18	753,734.80
394.2	Shop Equipment	142,759.33	101,811.82
394.3	Garage Equipment	1,970,777.86	467,521.67
395	Laboratory Equipment	1,731,094.98	1,111,495.75
396	Power Operated Equipment	0.00	0.00
397	Communication Equipment	430,049,979.31	159,362,852.25
398	Miscellaneous Equipment	3,293,182.06	815,959.78
118.1	TOTAL COMMON PLANT	<u>2,242,075,129.44</u>	<u>932,284,624.78</u>
	TOTAL ELECTRIC PLANT	19,615,047,137.15	6,722,672,338.07
	TOTAL GAS PLANT	3,584,116,307.07	1,247,133,978.40
	TOTAL COMMON PLANT	<u>2,242,075,129.44</u>	<u>932,284,624.78</u>
101 & 118.1	TOTAL	<u>25,441,238,573.66</u>	<u>8,902,090,941.25</u>
101	PLANT IN SERV-SONGS FULLY RECOVER	<u>0.00</u>	<u>0.00</u>
101	PLANT IN SERV-ELECTRIC NON-RECON		
	Electric	0.00	0.00
	Gas	0.00	0.00
	Common	0.00	0.00
		<u>0.00</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-CLOUD CONTRA		
	Electric	0.00	0.00
	Common	(18,348,391.47)	(3,432,876.70)
		<u>(18,348,391.47)</u>	<u>(3,432,876.70)</u>
101	PLANT IN SERV-PP TO SAP OUT OF BAL		
	Electric	0.00	0.00
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	(1,494,846.06)	(1,494,846.06)
101	Accrual for Retirements		
	Electric	(10,636,292.65)	(10,636,292.65)
	Gas	(978,059.15)	(978,059.15)
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(11,614,351.80)</u>	<u>(11,614,351.80)</u>
102	Electric	0.00	0.00
	Gas	0.00	0.00
	TOTAL PLANT PURCHASED OR SOLD	<u>0.00</u>	<u>0.00</u>
104	Electric	112,194,000.02	37,241,012.72
	Electric	0.00	0.00
	Gas	0.00	0.00
	TOTAL PLANT LEASED TO OTHERS	<u>112,194,000.02</u>	<u>37,241,012.72</u>
105	Plant Held for Future Use		
	Electric	0.00	0.00
	Gas	0.00	0.00
	TOTAL PLANT HELD FOR FUTURE USE	<u>0.00</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	1,468,835,401.15	
	Gas	183,912,933.95	
	Common	347,602,583.68	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>2,000,350,918.78</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
108.5	Accumulated Nuclear Decommissioning Electric	0.00	862,977,951.08
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	0.00	862,977,951.08
101.1	ELECTRIC CAPITAL LEASES	1,307,422,019.46	119,783,845.79
118.1	COMMON CAPITAL LEASE	93,281,361.53	32,782,014.23
		1,400,703,380.99	152,565,860.02
143	FAS 143 ASSETS - Legal Obligation	5,644,907.38	(855,456,405.20)
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	191,220,880.01	59,488,766.35
143	FAS 143 ASSETS - COR - Legal Obligation	0.00	#####
	TOTAL FAS 143	196,865,787.39	#####
	UTILITY PLANT TOTAL	29,119,895,071.51	6,933,787,442.89

ATTACHMENT E
SUMMARY OF EARNINGS

SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
Mar 2023
(\$ IN MILLIONS)

Line No.	Item	Amount
1	Operating Revenue	\$ 1,855
2	Operating Expenses	<u>1,541</u>
3	Net Operating Income	<u>\$ 314</u>
4	Weighted Average Rate Base	\$ 14,145
5	Rate of Return*	7.55%

*Authorized Cost of Capital

ATTACHMENT F

GOVERNMENTAL ENTITIES RECEIVING NOTICE

State of California
Attorney General's Office
P.O. Box 944255
Sacramento, CA 94244-2550

Naval Facilities Engineering
Command
Navy Rate Intervention
1314 Harwood Street SE
Washing Navy Yard, DC 20374

City of Carlsbad
Attn. City Attorney
1200 Carlsbad Village Drive
Carlsbad, CA 92008-19589

City of Chula Vista
Attn. City Attorney
276 Fourth Ave
Chula Vista, Ca 91910-2631

City of Dana Point
Attn. City Attorney
33282 Golden Lantern
Dana Point, CA 92629

City of Del Mar
Attn. City Clerk
1050 Camino Del Mar
Del Mar, CA 92014

City of Encinitas
Attn. City Attorney
505 S. Vulcan Ave.
Encinitas, CA 92024

City of Escondido
Attn. City Attorney
201 N. Broadway
Escondido, CA 92025

City of Imperial Beach
Attn. City Clerk
825 Imperial Beach Blvd
Imperial Beach, CA 92032

City of Laguna Beach
Attn. City Clerk
505 Forest Ave
Laguna Beach, CA 92651

State of California
Attn. Director Dept of General
Services
PO Box 989052
West Sacramento, CA 95798-9052

Alpine County
Attn. County Clerk
99 Water Street, P.O. Box 158
Markleeville, CA 96120

City of Carlsbad
Attn. Office of the County Clerk
1200 Carlsbad Village Drive
Carlsbad, CA 92008-19589

City of Coronado
Attn. Office of the City Clerk
1825 Strand Way
Coronado, CA 92118

City of Dana Point
Attn. City Clerk
33282 Golden Lantern
Dana Point, CA 92629

City of El Cajon
Attn. City Clerk
200 Civic Way
El Cajon, CA 92020

City of Encinitas
Attn. City Clerk
505 S. Vulcan Ave.
Encinitas, CA 92024

City of Fallbrook
Chamber of Commerce
Attn. City Clerk
111 S. Main Avenue
Fallbrook, CA 92028

City of Imperial Beach
Attn. City Attorney
825 Imperial Beach Blvd
Imperial Beach, CA 92032

City of Laguna Beach
Attn. City Attorney
505 Forest Ave
Laguna Beach, CA 92651

Department of U.S. Administration
General Services Administration
300 N. Los Angeles St. #3108
Los Angeles, CA 90012

Borrego Springs Chamber of
Commerce Attn. City Clerk
786 Palm Canyon Dr
PO Box 420
Borrego Springs CA 92004-0420

City of Chula Vista
Attn: Office of the City Clerk
276 Fourth Avenue
Chula Vista, California 91910-2631

City of Coronado
Attn. City Attorney
1825 Strand Way
Coronado, CA 92118

City of Del Mar
Attn. City Attorney
1050 Camino Del Mar
Del Mar, CA 92014

City of El Cajon
Attn. City Attorney
200 Civic Way
El Cajon, CA 92020

City of Escondido
Attn. City Clerk
201 N. Broadway
Escondido, CA 92025

City of Fallbrook
Chamber of Commerce
Attn. City Attorney
111 S. Main Avenue
Fallbrook, CA 92028

Julian Chamber of Commerce
P.O. Box 1866
2129 Main Street
Julian, CA

City of Laguna Niguel
Attn. City Attorney
30111 Crown Valley Parkway
Laguna Niguel, California 92677

City of Laguna Niguel
Attn. City Clerk
30111 Crown Valley Parkway
Laguna Niguel, California 92677

City of Lakeside
Attn. City Clerk
9924 Vine Street
Lakeside CA 92040

City of La Mesa
Attn. City Attorney
8130 Allison Avenue
La Mesa, CA 91941

City of La Mesa
Attn. City Clerk
8130 Allison Avenue
La Mesa, CA 91941

City of Lemon Grove
Attn. City Clerk
3232 Main St.
Lemon Grove, CA 92045

City of Lemon Grove
Attn. City Attorney
3232 Main St.
Lemon Grove, CA 92045

City of Mission Viejo
Attn: City Clerk
200 Civic Center
Mission Viejo, CA 92691

City of Mission Viejo
Attn: City Attorney
200 Civic Center
Mission Viejo, CA 92691

City of National City
Attn. City Clerk
1243 National City Blvd
National City, CA 92050

City of National City
Attn. City Attorney
1243 National City Blvd
National City, CA 92050

City of Oceanside
Attn. City Clerk
300 N. Coast Highway
Oceanside, CA 92054-2885

City of Oceanside
Attn. City Attorney
300 N. Coast Highway
Oceanside, CA 92054-2885

County of Orange
Attn. County Counsel
P.O. Box 1379
Santa Ana, CA 92702

County of Orange
Attn. County Clerk
12 Civic Center Plaza, Room 101
Santa Ana, CA 92701

City of Poway
Attn. City Clerk
P.O. Box 789
Poway, CA 92064

City of Poway
Attn. City Attorney
P.O. Box 789
Poway, CA 92064

City of Ramona
Attn. City Clerk
960 Main Street
Ramona, CA 92065

City of Ramona
Attn. City Attorney
960 Main Street
Ramona, CA 92065

City of San Diego
Attn. Mayor
202 C Street, 11th Floor
San Diego, CA 92101

City of San Clemente
Attn. City Clerk
100 Avenida Presidio
San Clemente, CA 92672

City of San Clemente
Attn. City Attorney
100 Avenida Presidio
San Clemente, CA 92672

County of San Diego
Attn. County Counsel
1600 Pacific Hwy
San Diego, CA 92101

County of San Diego
Attn. County Clerk
P.O. Box 121750
San Diego, CA 92101

City of San Diego
Attn. City Attorney
1200 Third Ave.
Suite 1620
San Diego, CA 92101

City of San Diego
Attn. City Clerk
202 C Street, 2nd Floor
San Diego, CA 92101

City of San Marcos
Attn. City Attorney
1 Civic Center Dr.
San Marcos, CA 92069

City of San Marcos
Attn. City Clerk
1 Civic Center Dr.
San Marcos, CA 92069

City of Santee
Attn. City Clerk
10601 Magnolia Avenue
Santee, CA 92071

City of Santee
Attn. City Attorney
10601 Magnolia Avenue
Santee, CA 92071

City of Solana Beach
Attn. City Attorney
635 S. Highway 101
Solana Beach, CA 92075

Spring Valley Chamber of
Commerce
Attn. City Clerk
3322 Sweetwater Springs Blvd,
Ste. 202
Spring Valley, CA 91977-3142

Valley Center Chamber of
Commerce
Attn. City Clerk
P.O. Box 8
Valley Center, CA 92082

City of Vista
Attn. City Attorney
200 Civic Center Drive, Bldg. K
Vista, CA 92084

City of Vista
Attn. City Clerk
200 Civic Center Drive
Vista, CA 92084

City of Aliso Viejo
12 Journey
Aliso Viejo, CA 92656