BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish Energization Timelines.	R.24-01-018 (Filed January 25, 2024)

SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E), PACIFIC GAS AND ELECTRIC COMPANY (U 39 E), AND SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) RESPONSE TO ADMINISTRATIVE LAW JUDGE RULING DIRECTING UTILITY RESPONSES TO QUESTIONS REGARDING ENERGIZATION TIMELINES

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I. INTRODUCTION

Pursuant to the March 21, 2024, Administrative Law Judge Ruling Directing Utility Responses to Questions Regarding Energization Timelines ("Ruling"), and the April 8, 2024 Email Ruling Adjusting Phase 1 Schedule and Addressing the April 2, 2024 Joint IOU Motion,[1] San Diego Gas & Electric Company ("SDG&E), on behalf of itself, Pacific Gas and Electric Company ("PG&E"), and Southern California Edison Company ("SCE") (collectively referred to as the "Joint Investor Owned-Utilities" or "Joint IOUs"), submits this response to the Ruling.[2]

The Ruling sets forth six questions, some of which include sub-questions. In Section II below, the Joint IOUs provide a joint response to Question 1 and Question 2 of the Ruling as directed by the Commission. In Section III, below, each of the Joint IOUs provide individual and separate responses to Question 3 through 6 of the Ruling. Due to the quick turnaround time requested, the Joint IOUs did not have a chance to normalize assumptions and reconcile the

[1] The April 8 ruling directed the Joint IOUs to file a consolidated response to the Ruling and extended the response deadline to April 22, 2024.

[2] Pursuant to Rule 1.8(d), counsel for SDG&E certifies that SDG&E has been fully authorized by SCE and PG&E to submit this joint response on their behalf.

different approaches to tracking amongst one another. The Joint IOUs believe the IOUs and the Commission should work together to do this important work to standardize assumptions and approaches so that the Commission can leverage the appropriate fact base to make its determination of what constitutes a "reasonable energization timeline" as required by Senate Bill (SB) 410 (SB 410, Stats. 2023, Ch. 394).

For convenience and clarity, each of the Joint IOUs' responses are contained in separate subsections (*i.e.*, A, B, and C). The Joint IOUs make clear that each of their individual responses to Questions 3 through 6 reflect their own information, views, and/or positions and do not reflect the views or positions of any other IOU. Finally, several questions in the Ruling request that the Joint IOUs provide data in an Excel spreadsheet. Those spreadsheets and/or supporting workbooks are contained in the attached **Appendix**.

II. JOINT IOU RESPONSES TO QUESTIONS 1 AND 2

1. To better address Public Utilities Code (Pub. Util. Code) § 934 (a)(1), the utilities shall provide detailed information about the existing average and maximum target energization time periods the Commission should consider to establish baseline targets for the electrical corporations to energize new or upgraded service.

a. The utilities shall jointly propose a standard energization data collection process that will record and report all data reflecting the total time to complete an energization request from the date an applicant submits a request for service[3] to the date a project is completed. The joint utility proposal must at minimum include the following:

i. A standardized list of steps to complete the energization process, as defined by Section 931(b)[1] that includes:

1. The full list of steps to complete Electric Rule 15, 16, 29/45, and a joint list of different types of upstream

[3] SB 410 (Section 931(c)) defines the start of the "Energization time period" as follows: "the elapsed time beginning when the electrical corporation receives a substantially complete energization project application . . . ." This starting point may be different from "the date an applicant submits a request for service."

distribution capacity projects (e.g., bank replacement, feeder installation, circuit upgrade, etc.) and the steps to complete each type of project, and any additional energization steps not covered in these processes.

The Joint IOUs respond to Question 1.a.i.1 in two separate sections below. First, the Joint IOUs provide a generalized list of steps to complete the energization[4] process for customers requesting service pursuant to Rules 15, 16 and 29/45,[5] which reflects the time to complete an energization request from the date an applicant submits a request for service to the date the energization request is fulfilled. Second, the Joint IOUs provide a narrative response addressing the question seeking a list of different types of "upstream distribution capacity projects," and "the steps to complete each type of project."

The Joint IOUs propose the following standardized list of steps to complete the energization process:

1. Customer Initiation / Intake
2. Engineering & Design
3. Dependencies
4. Site Readiness
5. Construction

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4 *See* Ruling, p. 1, footnote 1 for the definition of "Energization."

5 The Commission previously established, on an "interim" basis, the steps and a "temporary average" energization timeline for Rule 29/45 energization projects in Resolution E-5247 dated December 15, 2022 (adopted within R.18-12-006). As Rule 29/45 steps and timelines are within the scope of R.24-01-018 and there are no material differences in the energization process for Rules 15, 16, and 29/45, the Joint IOUs developed a standard set of five steps that would apply to all energization projects, regardless of tariff rule. It is the IOUs' understanding that a final decision in this proceeding on Rule 29/45 steps and timelines would supersede the interim 12-step process and 125-day timeline for Rule 29/45 projects adopted in Resolution E-5247. Accordingly, the Joint IOUs' proposal departs from interim Rule 29/45 steps and timeline in Resolution E-5247 to better align with historical energization data and to ensure a consistent approach for energization projects under Rules 15, 16, and 29/45.

A joint list of different types of upstream distribution capacity projects and the steps to complete each type of project:

Upstream distribution capacity upgrades, if identified as necessary to accommodate a particular customer's energization request, typically would be initiated in "Step 2: Engineering & Design" of the above-mentioned energization process and should be completed prior to or by the date an energization request is fulfilled. The Joint IOUs do not believe that developing or tracking timelines for completing upstream distribution capacity upgrades will provide the Commission, customers or other stakeholders with meaningful information as the timelines will vary greatly by upgrade, based upon the variables that are unique to that upgrade. Further, the Joint IOUs do not recommend tracking these steps in a data collection proposal, as the sub-steps for completing a particular upgrade vary widely depending on the specific characteristics of, and requirements associated with, the upgrade.

Subject to the foregoing considerations, the Joint IOUs provide the following response regarding upstream distribution capacity upgrade types and typical steps to complete these upgrades.

- Types of upstream distribution capacity upgrades:[6]
    1. New or Upgraded Circuits[7]
    2. Existing Substation Upgrades
    3. New Distribution Substation
- Typical Steps to complete upstream distribution capacity upgrades:
    1. Engineering Study or Needs Identification.

[6] SCE includes upgrade projects to systems greater than 50kV.

[7] Utilization of existing distribution system capacity is always considered prior to initiating backbone distribution capacity upgrades.

2. Scoping or Solutioning

3. Design

4. Easement, Permitting, Licensing, and Sourcing

5. Construction

2. A standardized explanation of the order in which the steps in (a)(1) above are completed, a brief explanation of each step, and the party responsible for completing the step (e.g., utility, customer, etc.).

Below is the explanation and identification of each party that is primarily responsible for the five energization steps identified above. The "Dependencies" step reflects those tasks that are primarily within the customer's and/or the Authority Having Jurisdiction ("AHJ's") control such as where a customer needs to obtain a permit for their work. To the extent the IOU needs to obtain a utility permit, the IOU would track its tasks within another step for which the IOU is primarily responsible.

Step to Energization	Description	Party Primarily Responsible
Customer Initiation	• Customer submits service energization request. • IOU reviews customer submission, educates customer on the energization process and submission requirements. • Once customer application is deemed complete, Applicant Final Submittal (AFS) date is established.	Customer
Engineering & Design	• IOU completes field visit, engineering study, creates project design and determines cost of project.	IOU
Dependencies	• Permits, easements secured, contracts signed,	Customer, AHJ, or other non-IOU stakeholders

	fees paid, among other third-party approvals.	
Site Readiness	• Preconstruction field meeting. • Customer required construction is completed. • Customer schedules and completes civil construction. *For Rule 29/45, IOU schedules and completes civil construction.	Customer for Rule 15/16 IOU for Rule 29/45
Construction	• IOU schedules and completes electrical construction, including traffic control, scheduling outages, etc.	IOU

As provided in the table above, the Joint IOUs identified five general steps beginning with initiation to when the customer's service transformer is energized and ready to supply the customer's incremental load, or for service order requests when the crew completes the work. While the five energization steps provided above are listed sequentially, several of these steps often occur concurrently. For example, the Dependencies and Site Readiness steps will likely be completed in parallel, so to the extent the Commission adopts an end-to-end energization timeline, it would need to account for that overlap. Based on the Joint IOUs' experience with interim Rule 29/45 timelines, tracking by phases would be the most practical approach. It would allow the most synergy among the IOUs and would conform to the IOUs' existing reporting capabilities for Rule 15 and Rule 16. In addition, several of the steps (Customer Initiation, Dependencies) involve back-and-forth review, submission, and approval of documents among the IOUs, the customer, and the AHJs. For steps within the IOU's control, there are also activities, such as material procurement, that are impacted by factors outside of the IOU's control. Given well known issues surrounding domestic and international supply chain

shortages, securing critical materials has been challenging and can significantly impact energization timelines. While the Joint IOUs will be able to report on the timelines for steps primarily controlled by the IOUs, the Joint IOUs' existing systems cannot separately track the timing of each entity's activity within a phase. In addition, the IOUs may not be able to separately report timing for steps that occur concurrently.

Explanation of Upstream Distribution Capacity Projects

For the upstream distribution capacity upgrades, the "process to complete an upgrade" typically begins with the "engineering study" that identifies distribution "grid needs." Following the identification of "grid needs," the distribution engineers evaluate, select, and scope out the potential mitigation solutions. Where the solution requires an upgrade of the distribution infrastructure, a design process is initiated. Land acquisition, environmental releases, easements, regulatory approvals, material procurement, and construction permitting are initiated in parallel, as required/applicable. Once the design is complete and required land rights, permits and licensing are obtained, the planned distribution upgrade is issued for construction. The upgrade is then built, tested, and placed in service, sometimes subject to coordination with operation centers' outage requirements. The exact steps for completing a particular upgrade vary widely depending on the specific characteristics of, and requirements associated with, the upgrade. Generally, the IOUs are responsible for completing the engineering study, scoping, design, and construction, with input from the customers to ensure accurate and complete information is included in the customer's application. With respect to utility-owned facilities, the IOUs are responsible for obtaining easement, permitting, materials and licensing. However, given the complexity of particular facility additions, the timing for completing these items is often largely outside the IOU's control. In particular, material

sourcing, easement and land acquisition are heavily impacted by external factors; permitting and licensing times vary greatly and are subject to different jurisdictions.

ii. Categories to separately record and report the timelines for different types of end-use projects (i.e., Transportation Electrification, Residential Upgrades, Commercial Development, etc.).

The Joint IOUs do not recommend recording and reporting timelines separately for different types of end-use projects as there is no direct correlation between timeline and end-use project types. In other words, the end use is not what determines the timing of the energization process. In addition, basing energization timelines on end use types could result in prioritizing some industries over others in contravention of Pub. Util. Code Section 453. Instead, the Joint IOUs do recommend that timelines be tracked and reported separately based on Tariff Rules, *i.e.*, Rule 15 projects, Rule 16 projects, Rules 15 + 16 projects, and Rule 29/45 projects. In addition, the Commission could consider separate tracking based on project size, as long as workable definitions of these categories can be developed. Evaluating energization timelines by similar size of projects could allow for a more consistent means of comparison between IOUs' energization timelines. It would also allow for comparison between projects of similar complexity.

b. Categories to separately track the amount of time a project is determined to be in a backlog for each step.[8]

The Joint IOUs interpret this question as asking if there are instances where the utilities would place certain energization projects on hold while utility resources are redirected to other

[8] "For the purposes of this Ruling, a project being in a backlog is defined as the project, or step in the project energization process, being on hold while utility resources are allocated to furthering other projects. The project can be considered to come out of the backlog when utility work starts to complete the energization process step and/or project." Ruling, p.2.

projects. Although the volume of energization requests can, at times, outpace available resources resulting in longer processing times, the Joint IOUs do not place some projects in backlog status to prioritize other projects. Accordingly, the Joint IOUs do not have a "backlog" as defined in the Ruling. In addition, the Joint IOUs do not consider a project to be in a "backlog" status when it is pending completion of customer or AHJ responsibilities. The timing of those steps is not controlled by the IOUs, and the IOUs do not monitor how long a customer or AHJ might take to complete tasks for which they are responsible, such as permits, easements, and preparing the site for construction. The Joint IOUs do not collect data on the intervals of time when the customer or AHJ is completing their respective steps. Nor do the IOUs re-prioritize projects while they are in a customer- or AHJ-controlled phase.

c. An explanation from each utility describing the differences between their existing data collection efforts and the proposed joint utility data collection process.

As directed by the April 8, 2024 ruling,[9] the Joint IOUs have compiled their responses in one section. However, this question calls for individual responses from each utility's existing data collection efforts.

SDG&E Response:

SDG&E's existing systems can report on four distinct phases for timeline reporting:

- Initiation (Customer site inquiry),
- In Planning (Engineering & Design), - for larger projects, specifically underground, this phase is split into two phases:
    - Preliminary Design
    - Final Design

[9] Email Ruling Adjusting Phase 1 Schedule and Addressing the April 2, 2024 Joint IOU Motion

- Pre-Construction (Site Readiness/Civil Construction) and
- Construction.

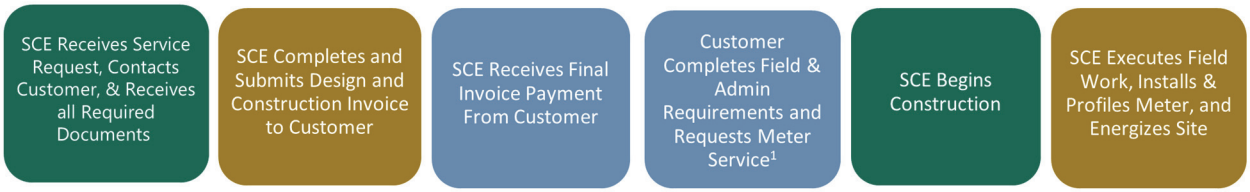
The proposed joint utility data collection will require additional process, resources, and enhancements to SDG&E systems to allow tracking for the "Dependencies" phase, which is currently reflected in the timeline of the other phases. SDG&E provides an overview of the current activities within each phase in the following table. While the phases below are tracked for progress/completion, not all activities listed within a phase are currently tracked for timeline reporting.

Phases	**Overview of SDG&E Activities**
Initiation	Customer Application: • Customer submits Site Inquiry • Customer provides full project submittal • SDG&E reviews and confirms customer submission is complete • Applicant Final Submittal (AFS) date is established For Rule 45: • SDG&E performs preliminary engineering study • Customer and SDG&E agree on site concept and submits all application materials.
In Planning (Engineering & Design)	Preliminary Design: • SDG&E executes Preliminary Design including preliminary engineering study. • Customer approves/declines Preliminary Design
	Final Design: • SDG&E finalizes Design, including final engineering study, and delivers Cost and Contract to Customer, if applicable. • SDG&E creates and submits Easement documents and AHJ permit requests for IOU construction • Customer delivers to SDG&E the Easement signatures and the signed Contracts • AHJ issues requested permits to IOU
PreConstruction (Site Readiness)	PreConstruction: • Customer and SDG&E complete PreConstruction field meeting • Customer completes all Onsite Work and applicable Inspections • SDG&E reviews and releases customer civil construction and confirms all AHJ releases, if applicable and account application are complete before releasing to IOU scheduling. For Rule 45: SDG&E schedules and completes Civil Construction work
Construction	Construction: • SDG&E schedules and completes Electric Construction work

	• This phase includes scheduling outages which sometimes involve multiple AHJs and subject to the minimum notification time for affected customers.

SCE Response:

SCE is currently utilizing an end-to-end 6-phase approach based on available internal data (shown below):



While SCE differentiates between customer and SCE responsibilities in the existing data collection process, SCE does not currently have corresponding customer data available. SCE does not collect data on the intervals of time when the customer is completing its respective steps. SCE is building a customer platform (Common Intake) that will provide some of the customer-specific data for the Intake process (Q1 2025).

PG&E Response:

PG&E can report on each of the five distinct phases for timeline reporting.

- Initiation (Customer site inquiry)
- Engineering & Design
- Dependencies
- Pre-Construction (Civil Construction)
- Construction.

Additionally, PG&E tracks certain subtasks and their corresponding start/end points as well as the Customer's requested completion date for the project and the subsequent due dates for the major project milestones. PG&E also recently developed the capability to track the next

subtask for each project, who is responsible for the task (Customer vs. Utility) and the due date for the task.

d. A description from each utility explaining how the Commission can compare their existing energization timing data to the existing energization timing data of the other utilities.

As directed by the April 8, 2024 Ruling, the Joint IOUs have compiled their responses in one section. However, the question calls for individual responses from each utility.

SDG&E Response:

SDG&E's energization timeline differs from PG&E's for "large projects." For "large projects," SDG&E tracks the times for the preliminary and final design phases separately, while PG&E tracks preliminary and final design as a single combined phase. Additionally, unlike SCE and PG&E, SDG&E's systems cannot separately track timelines for dependencies. Accordingly, for these elements of the energization timeline, it is not possible to draw a comparison with the SCE and PG&E data.

SCE Response:

SCE's existing overall energization steps are similar to PG&E's and SDG&E's with the exceptions of not being able to track customer data touchpoints or the preliminary design phase. As such, it would be difficult to draw comparisons of existing timing data across utilities because SCE is not currently able to differentiate the timing between SCE's responsibilities and the customers responsibilities when they are happening concurrently, as with Dependencies and Site Readiness.

PG&E Response:

The PG&E energization steps are somewhat similar to SCE and SDG&E. The only known variability is in the design phase where SCE and SDG&E have a two-step design process (preliminary design and final design) and PG&E has a single design phase only. PG&E

does not believe the start- and end-points of similar phases are exactly the same for all IOUs. The current process steps and start- and end-points are defined in the table below.

Process Step	Start Point	End Point
Initiation/Intake	Application Submit Date	Application Deemed Complete/Order Creation
Design	App Deemed Complete	Design Approved by Supervisor
Contract	Date Contract Sent	Date Contract Returned Paid
Dependencies	Design and Estimate Approval date	Date all dependencies cleared (Permit, Joint Pole, Land, Environmental, FAA)
Pre-Construction	Dependency End Date	Date Clear for Construction
Construction	Date Clear for Construction	Date of Energization

Initiation/Intake: Customer submits their application. PG&E works with the customer to finalize the application, collect all needed documentation and finalize the project scope with the customer.

Design: PG&E completes the design and engineering for the customer's project based on the information collected and validated in the initiation phase. PG&E will then determine the customer's cost for completing the project. Note: unlike SCE and SDG&E, PG&E does not complete a preliminary design and a final design. Only a single, complete design is provided to the customer.

Contract: A contract is provided to the customer which they sign and return along with monies that are needed to complete the project.

Dependencies: Dependencies include the customer completing any easements required and the utility completing Environmental reviews, Joint Pole, FAA clearances and obtaining agency permits to perform construction work.

Pre-Construction: Primarily a customer-driven phase, this is when the customer is completing civil construction at their project location, obtaining any inspections and preparing their job site for PG&E to perform construction activities.

Construction: PG&E schedules and executes all construction work for the projects, resulting in an energized project.

2. For each of the standard steps to complete an energization request provided in the joint utility standard energization date collection process, each utility should individually provide both the data requested in the table below and its source data in an Excel spreadsheet.

a. The data should be for the past five (5) years (January 2019-December 2023) and be provided in business days.

b. When calculating the average, median, and standard deviation for each of the steps, exclude time that the project is in a backlog.

c. Where data is not currently being collected, based on experience, the utility shall propose a reasonable average and maximum amount of time that is needed to complete the step and provide an explanation of any assumptions and unit of measure used for determining their proposal(s).

As directed by the April 8, 2024 ruling, the Joint IOUs have compiled their responses in one section. However, this question calls for individual responses from each utility.

SDG&E Response:

Please see the SDG&E Energization Timelines table below for SDG&E's historical data. The source data is provided in the Appendix of this filing. SDG&E systems do not specifically track time when SDG&E's response to an energization request experiences a delay outside of utility control, so the provided timeline below includes all delay times. The table below reflects SDG&E's Rule 15 timeline as this tariff requires the most time to complete. Providing data based on all the tariffs will reflect a shorter than actual timeline for projects that require Rule 15 work. Please note that estimate average and maximum timelines for Dependencies are not currently tracked separately. Rather, Dependencies are embedded in SDG&E's Engineering& Design step and reflect both SDG&E and Customer/Third-party activities.

Table SDGE Q2 - SDG&E Energization Timelines by Step in Energization Process (Rule 15 timeline)						
Standard Steps in the Energization Process	Average in business days[10]	Median in business days	Standard Deviation in business days	*Estimated Reasonable Average (business day)	*Estimated Maximum (business day)	Notes
Customer Initiation	41	4	69			
Engineering &Design	184	141	152			
Dependencies	*included in Engineering &Design	*included in Engineering &Design	*included in Engineering &Design			
Site Readiness	151	120	128			
Construction	80	31	120			
**Only provide these fields if there is no data available on the energization process step.*						

SCE Response:

a.

Energization Timelines by Step in Energization Process - Rule 29 Only Projects						
Standard Steps in the Energization Process	Average (day)	Median (day)	Standard Deviation	*Estimated Reasonable Average (day)	*Estimated Maximum (day)	Notes
Customer Initiation	83.42	59	72.49			
Engineering & Design	173.4	138	111.94			
Dependencies	97.25	75	46.41			
Site Readiness	125.94	115	54.53			
Construction	24.46	23	5.08			
Project Completion	273.75	273	90.03			
*Only provide these fields if there is no data available on the energization process step.						

[10] For timeline data in Business Days provided in Question 2, 3 and 4, SDG&E uses an excel spreadsheet function to estimate the number of business days. Therefore, it may not fully reflect the actual business days as it only excludes weekends, but may include non-working holidays.

Energization Timelines by Step in Energization Process - Rule 29 Projects greater than 2MW and/or requires a Rule 15 upgrade						
Standard Steps in the Energization Process	Average (day)	Median (day)	Standard Deviation	*Estimated Reasonable Average (day)	*Estimated Maximum (day)	Notes
Customer Initiation	144.14	118	146.46			
Engineering & Design	185.6	157	110.58			
Dependencies	72.8	74	46.44			
Site Readiness	176.6	182	58.82			
Construction	33.13	32	7.62			
Project Completion	291.25	294	63.56			
*Only provide these fields if there is no data available on the energization process step.						

Energization Timelines by Step in Energization Process - Rule 15 and 16					
Standard Steps in the Energization Process	Average (day)	Median (day)	Standard Deviation	*Estimated Reasonable Average (day)	*Estimated Maximum (day)

Customer Initiation	45	23	65		
Engineering & Design	36	17	53		
Dependencies	138	104	121		
Site Readiness	N/A - included in Dependencies	N/A - included in Dependencies	N/A - included in Dependencies		
Construction	49	24	72		
Overall Completion	268	248	141		
*Only provide these fields if there is no data available on the energization process step.					

Source data is available in the attached "SCE - Rule 15 and Rule 16 Source Data.xlsx" and "SCE - Rule 29 Source Data.xlsx."

b. SCE has no "backlog" as defined in the ALJ Ruling, *i.e.*, SCE does not put some energization projects in "backlog" status (or on hold) to shift resources to other projects. SCE does not consider a project to be in a "backlog" status when it is pending completion of customer or AHJ responsibilities. The timing of those steps is not controlled by SCE, and SCE does not monitor how long a customer or AHJ might take to complete tasks for which they are responsible, such as permits, easements, preparing the site for construction. SCE does not collect data on the intervals of time when the customer or AHJ is completing their respective steps. Nor does SCE re-prioritize projects while they are in a customer- or AHJ-controlled phase.

c.

PG&E Response:

PG&E Energization Timelines by Step in Energization Process						
Standard Steps in the Energization Process	**Average (day)**	**Median (day)**	**Standard Deviation**	***Estimated Reasonable Average (day)**	***Estimated Maximum (day)**	**Notes**
Customer Initiation / Intake	60 Days	40 Days	79 Days			
Engineering & Design	78 Days	62 Days	72 Days			
Dependencies	88 Days	32 Days	162 Days			
Site Readiness	60 Days	18 Days	109 Days			
Construction	45 Days	28 Days	85 Days			
**Only provide these fields if there is no data available on the energization process step.*						

III. INDIVIDUAL IOU RESPONSES TO QUESTIONS 3 – 6

As previously stated, the Joint IOUs make clear that each of their individual responses to Questions 3 through 6 reflect their own information, views, and/or positions and do not reflect the views or positions of any other IOU.

A. SDG&E's Individual Responses to Questions 3-6

Question 3: ***In an Excel spreadsheet, using data from the past five (5) years (January 2019 - December 2023), each utility shall provide an average, median, and standard deviation for the time to complete each type of upstream distribution capacity upgrade from the joint list. Include any time that projects are in a backlog. Annual Reporting Requirements. These metrics shall be reported in business days.***

SDG&E Response to Question 3:

SDG&E notes that although an energization timeline may appear to be long, it should not be automatically assumed that there was a "delay" in meeting the customer's electrical needs. As explained in SDG&E's Panel 2 presentation at the February 2, 2024 Energization OIR workshop, it is not uncommon for customers with larger electrification needs to submit a

service request with a need-by date out in the future. For example, an electric service request may be received in 2024 but the required date of service, and the corresponding in-service date for the triggered upstream distribution capacity upgrade, is in 2028. The initiation of the upgrade is driven by the complexity, location, and timing of the customer service request. In this case, SDG&E may not need to initiate design and construction until 2026. Reported data needs to be interpreted with this possibility in mind.

Further, the date the upstream distribution capacity upgrade is completed only indicates the date the upstream capacity is *available* to satisfy customers' requests. It is not necessarily the date that the customer is actually in a position to energize new load. For example, the formal energization process may have pending activities that need to be completed on the secondary distribution system. Or customers may have additional activities they need to complete on the customer's side of the meter before they energize their equipment. Hence, SDG&E does not feel the "time to complete each…upstream distribution capacity upgrade" necessarily reflects the amount of time that it takes for the customer to energize its incremental load. Rather, in response to question 3, SDG&E believes it is more instructive to provide the time that elapses between the initiation date of the service request and the date the service request is fulfilled by SDG&E.

It is also worth noting that the historical energization time for service requests that have triggered upstream distribution capacity upgrades are already embedded in the timeline provided by SDG&E to Question 2 above. SDG&E carved out, to the best of its ability, those upgrades that can be clearly traced to a specific customer service request and calculated the requested timeline duration for these projects. SDG&E identified four customer service requests in this process and collected the job initiation date and energization date for each request. The

average, mean and standard deviation of these times in business days are captured in "Table SDG&E Q3" below, the data is also included in Tab "Response to Question 3" of the Attached spreadsheet named "*SDG&E Response to ALJ Ruling Directing Response.xlsx".* SDG&E has not identified any substation upgrades completed between 2019 – 2023 that were triggered by a specific customer service request.

Table SDGE Q3 - Energization Timelines by Upstream Distribution Capacity Upgrade Type					
Upstream Distribution Capacity Upgrade Type	Average (business days)	Median (business days)	Standard Deviation (business days)	Percentage of Instances Upgrade Type is Triggered by an Energization Request	Notes
New and upgrade circuits	646	626	181	N/A	

The question also asks for including the "percentage of instances upgrade type is triggered by an Energization request." There are a variety of drivers for upstream distribution capacity upgrades identified through the distribution planning process ("DPP"). These drivers include organic or economically-induced load growth, forecast growth of certain load components such as Electric Vehicle charging loads or building electrification, and/or new service requests that result in "known loads." In rare cases, the driver for a particular distribution capacity upgrade can reasonably be associated with a particular service request.

In most cases, however, the trigger for a particular upstream distribution capacity upgrade is unrelated to, or only tangentially related to, a particular customer's service request. Given the many different drivers that result in upstream distribution capacity upgrades, including, potentially, multiple known load requests which may be received over a period of time, there is no non-arbitrary way to determine whether any individual service request triggered the upstream distribution capacity upgrade and therefore no way to establish a

meaningful energization timeline that links each customer service request to completion of an upstream distribution capacity upgrade. It is not possible, therefore, to calculate and provide the requested percentage.

Question 4: ***In an Excel spreadsheet, using data from the past five (5) years (January 2019 – December 2023), provide an average, median, and standard deviation for the time to complete energization projects that involve the following tariffs.***

- ***a. If projects fall into tariff combination categories not listed in the table below, please add them and report on the requested metrics.***
- ***b. Include any time that the projects are in a backlog.***
- ***c. Report all metrics in business days.***

SDG&E Response to Question 4:

SDG&E provides an average, median and standard deviation, in business days, in the table below for the time to complete energization projects that involve Rule 15, Rule 16, Rule 45 and various combinations of the tariffs.[11]

Table SDGE Q4 - Energization Timelines by Tariff Type

Tariff	Average (day)	Median (day)	Standard Deviation (day)	Notes
Rule 15	450	417	230	Job initiation (not AFS) to energize date; includes all stakeholders activities and generally occurring delays
Rule 16	188	121	188	Job initiation (not AFS) to energize date; includes all stakeholders activities and generally occurring delays
Rule 15 and 16	149	93	168	Job initiation (not AFS) to energize date; includes all stakeholders activities and generally occurring delays
Rule 45	n/a	n/a	n/a	N/A, only one site energized in 2023
Rule 15 and 45	n/a	n/a	n/a	n/a

[11] The calculated historical timelines include energization service requests that have triggered upstream distribution capacity upgrades.

Question 5: ***Using existing available data, provide the average energization timeline customers typically request when applying for energization of a new or upgraded service line, by project and customer type.***

SDG&E Response to Question 5:

While customers may indicate an energization request date when they submit their inquiry in SDG&E's online customer portal, the request date they enter is not necessarily accurate or realistic. Sometimes they enter a date to move forward with the online submission process, but that date is not a realistic reflection of when they need service energization. As such, customer requests are reviewed by SDG&E and a meeting is set to understand the customer's energization needs and load specifications. SDG&E educates and helps the customers understand the steps associated with its service request and a revised estimated energization date is set. While SDG&E sets an estimated energization date with the customer, this date will shift depending on the requirements of the specific service request and site conditions. SDG&E's systems do not capture changes from the customer's initial requested energization date to updated energization date.

It is SDG&E's experience that customers typically expect a shorter turnaround time for service requests with relatively small scope. For service requests having relatively larger scopes, *e.g.*, substantial load additions, customers typically submit service requests well in advance of the date that the customer anticipates that SDG&E will need to have service available to the customer. This advance notice provides a longer time frame within which the customer can complete its own related workstreams. Average energization timelines for new or upgraded service drops may therefore be considerably different depending on the scope of the customer service request.

Question 6: ***Using existing available data, describe what impact, if any, the need for a Main Panel Upgrade (MPU) has on the utilities' timing to complete an energization project. Explain how passing local government inspections and obtaining final utility connections can differ based on an MPU and what steps the utility has control over as opposed to the customer or local entities.***

SDG&E Response to Question 6:

Most service requests that come through SDG&E's Service Planning group involve an upgrade to the main service panel, also referred to as "MPU" in the question. It is rare for SDG&E's Service Planning group to receive service requests that simply need a disconnect/reconnect, unless it is needed for tree trimming. SDG&E does not track the timeline data in a way that can effectively quantify the impact of MPU on its timing to complete the service requests. On a conceptual level, for smaller service requests, when the customer does not request an upgrade to its main service panel, SDG&E's scope is typically small which results in faster timing. On the customer side, timelines are also shorter given that the customer will be less impacted by material shortages, electrician responsibilities, trenching requirements and the need for permits.

As far as the process for completing a MPU, there are a range of steps that would fall under the control of different entities. Factors under SDG&E control which may affect MPU timelines include items such as ensuring same day inspections are processed within 24 hours, scheduling a Standby Lineman when equipment verification is needed, trench inspections and final safety inspections. SDG&E also requires certain permits depending on site conditions, *e.g.* overhead disconnect/reconnect across a street requires traffic control. There are also several factors related to AHJ which would affect MPU timelines. For example, the AHJ approval for new builds or relocations could take 24-72 hours. In addition, certain MPUs require permits before work can commence. Factors within the customer control include items such as securing

AHJ inspections prior to energization. Customers also need to ensure they have provided the necessary information to secure right of way verifications and environmental reviews.

B. SCE's Individual Responses to Questions 3-6

Question 3: ***In an Excel spreadsheet, using data from the past five (5) years (January 2019 - December 2023), each utility shall provide an average, median, and standard deviation for the time to complete each type of upstream distribution capacity upgrade from the joint list. Include any time that projects are in a backlog. Annual Reporting Requirements. These metrics shall be reported in business days.***

SCE's Response to Question 3:

Capacity projects operate on much longer timeframes due to many additional factors outside utilities' control such as procurement constraints, land use permits and easements, environmental permitting, licensing, and compliance. Cycle times for upgrade projects also vary greatly based on project-specific operational and design requirements, protection requirements, environmental requirements, availability of major materials, permits and/or licensing requirements, the need to sequence project work with other planned projects prior to construction start and load serving requirements that impact outage approvals. These factors, along with the different types of capacity upgrades (*e.g.*, circuit vs. substation vs. new substation) that may be necessary in different regions, further drive the variability in the expected timeframes to complete capacity projects.

Please see the table below for SCE's historical data on capacity upgrade projects. The listed capacity projects encompass upgrades to systems greater than 50kV, which are captured within the annual Distribution/Transmission System Planning process, accounting for the aggregate of all energization requests and other forecasted load. Historically, with energization requests that require an upgrade to distribution systems greater than 50kV, a grid upgrade project has already been identified through the annual planning process and is in flight but could face lengthy delays due to, for example, the licensing process. Historical information provided

in the table may not be an accurate indicator for developing future timelines for capacity upgrade projects. For example, global supply chain issues impacting the sourcing of material or significant equipment can greatly affect schedules, especially for higher voltage projects. SCE systems do not specifically track when SCE's capacity upgrade projects are in a backlog.

SCE is unable to provide information for column titled "Percentage of Instances Upgrade Type is Triggered by an Energization Request." As explained above, grid upgrades come out of the annual Distribution/Transmission System Planning process. Within the planning process, many factors are considered, including economic growth, energization requests (*i.e.*, substantially complete applications), and other expected load growth, Typically, when a need for a capacity project is identified, there are multiple sources of load growth driving the need for the project, and so while one or more energization requests may be driving the need for the project, it would not be logical to characterize the capacity project as being triggered by a particular request. Occasionally, a new load request will result in a new need for a capacity project that was otherwise not anticipated, but this is not typical. Additionally, in many cases when an energization request cannot be accommodated due to capacity constraints, there is already a capacity project in flight (though completion may still be months or years away). In summary, while capacity constraints (and the long lead time of capacity projects) are a very real issue, trying to pinpoint the trigger of capacity projects is not possible, and would not actually provide useful information on the extent to which capacity projects cause energization delays across customer energization requests.

For these reasons, SCE's systems are not set up to provide this kind of tracking. There is no systematic tracking of the relationship between energization requests and capacity upgrade projects. The resulting data would come from multiple systems that are not currently integrated

and would not produce meaningful results. Because energization projects and capacity upgrade projects are tracked separately, SCE systems do not allow SCE to associate energization requests with capacity upgrade projects.

Energization Timelines by Upstream Distribution Capacity Upgrade Type – Business Day[12]					
Upstream Distribution Capacity Upgrade Type	Average (day)	Median (day)	Standard Deviation (day)	Percentage of Instances Upgrade Type is Triggered by an Energization Request	Notes
New and upgrade circuits	622	416	217	N/A	
Substation upgrades	1023	1102	689	N/A	
New substations	2223	2223	0	N/A	

Question 4: ***In an Excel spreadsheet, using data from the past five (5) years (January 2019 - December 2023), provide an average, median, and standard deviation for the time to complete energization projects that involve the following tariffs.***

- ***a. If projects fall into tariff combination categories not listed in the table below, please add them and report on the requested metrics.***
- ***b. Include any time that the projects are in a backlog.***
- ***c. Report all metrics in business days.***

SCE's Response to Question 4:

a.

Energization Timelines by Tariff Type				
Tariff	**Average (day)**	**Median (day)**	**Standard Deviation (day)**	**Notes**
Rule 15	288	273	140	Line Extension and EV - Line Extension

[12] SCE systems do not track project timing based on business days. Calculation was performed to arrive at the requested unit of measure.

Rule 16	244	218	138	New Meter & Service and EV - Rule 16
Rule 15 and 16	268	248	141	Line Extension, EV - Line Extension, New Meter & Service, and EV - Rule 16
Rule 29 /45	273.75	273	90.03	EV Infrastructure Service Extension
Rule 15 and 29/45	291.25	294	63.56	Line Extension plus EV Infrastructure Service Extension

b. SCE has no "backlog" as defined in the ALJ Ruling, *i.e.*, SCE does not put some energization projects in "backlog" status (or on hold) to shift resources to other projects. SCE does not consider a project to be in a "backlog" status when it is pending completion of customer or AHJ responsibilities. The timing of those steps is not controlled by SCE, and SCE does not monitor how long a customer or AHJ might take to complete tasks for which they are responsible, such as permits, easements, preparing the site for construction. SCE does not collect data on the intervals of time when the customer or AHJ is completing their respective steps. Nor does SCE re-prioritize projects while they are in a customer- or AHJ-controlled phase.

Question 5: ***Using existing available data, provide the average energization timeline customers typically request when applying for energization of a new or upgraded service line, by project and customer type.***

SCE's Response to Question 5:

SCE's Customer Project Information Sheet (CPIS) has a field that allows the customer to indicate the "approximate date (the customer) would like the job completed and energized," as shown in the screenshot below. When provided, this information is usually handwritten and may not be useful for several reasons: 1) customers often provide a date that is not feasible (too

soon), 2) simply mark that field "ASAP," or 3) leave that field blank. Additionally, SCE does have a mechanism to track the number of changes to the customer's expected date, beyond noting the most recent timeframe in its system (*i.e.*, we do not currently track the iterations to the timeframe or if the change was requested by SCE or the customer). Other factors may cause a customer to change their initially requested date such as (but not limited to) Permitting, Easements, Customer-driven design changes, etc. Given the significant variability in requested energization dates and types of projects, combined with data tracking limitations, it is not possible for SCE to provide the average energization timeline typically requested by customers.

Detailed Project Information

Residential: ☐	**Commercial:** ☐	**Industrial:** ☐	**Agricultural:** ☐
Service Requested:	Overhead: ☐	Underground: ☐	Indoor Cultivation ☐
Tract:	Lot(s):		Mixed-Light Cultivation ☐
Buildings:	Units:		
Is this project subject to Buy America Compliance? Yes ☐ No ☐		Temporary Service Required: Yes ☐ No ☐	
Approximate start work date for SCE crews:		Your Construction Start Date:	
Approximate date you would like the job completed and energized:			
Scope of Project:			

Planning only requests this information to facilitate a conversation with the customer and to establish expectations about current processes and timelines. Planning does not consider a project to be initiated until all required documents needed to complete an electrical design are received from the customer.

Question 6: ***Using existing available data, describe what impact, if any, the need for a Main Panel Upgrade (MPU) has on the utilities' timing to complete an energization project. Explain how passing local government inspections and obtaining final utility connections can differ based on an MPU and what steps the utility has control over as opposed to the customer or local entities.***

SCE's Response to Question 6:

SCE would define MPU as a service panel upgrade. This could be part of a Rule 16, Rule 15, or Rule 29 project. The factors listed below would affect the timing of MPU in every scenario. In a simple project where work scope is minimal the following factors could add an

additional 3-4 weeks or more in a more complex scenario where the scope of the work is significant and many of the factors listed below have the potential for adding an additional 12-16 weeks or more.

- Outside SCE's control:
    - Time it takes customer to contact SCE's planning department and make full submittal (including customer project information sheet, panel cutsheets, electrical drawings, base-map drawings, site surveys, etc.) that planner needs to determine the extent of the work the customer and SCE would need to complete to allow for the added load and for the new panel to be energized. SCE cannot control how long it takes a customer to provide necessary information for SCE's planning department to complete an approved design.
    - Once scope of the upgrade has been established, customer may have to sign contracts and pay invoices required for SCE to begin the scheduling process.
    - Customer may need to submit a new application for service, if existing service account will need to be changed or adjusted due to rates, billing, legal contacts, etc.
    - Customer may need to complete infrastructure upgrades to ducts and structures in order for SCE to install new equipment/cable necessary to serve the new/added load. Customer's construction timeline for this portion of project is completely outside SCE control.
    - Customer will need to procure new panel/switchgear and related electrical equipment. Timelines related to ordering and receiving electrical panels and other related equipment can be lengthy and are outside SCE' control.

- Once customer-owned equipment is installed, AHJ will need to issue permits and complete inspections of any customer equipment and facilities. This timeline is outside SCE's control.
- Customer will need to pass inspection of all customer-furnished ducts and structures required for SCE to install new distribution/service cable and equipment. SCE can provide detailed design and construction standards to customer to help them complete this work to SCE's standards; however, SCE cannot control how the customer proceeds with this construction, especially if multiple infractions are found by SCE inspector during this process.
- If the new panel will need to be placed in same location as existing panel, SCE will need to coordinate outage for customer to do the panel replacement itself, as well as for SCE to replace/upgrade any SCE facilities. Customer business needs often drive the timing of these outages and are outside SCE's control.
- SCE may require permits from AHJ to complete portions of SCE's electrical work related to the customer's project. The time it takes AHJs to issue permits is outside SCE control.
- There may be environmental factors impacting project timeline, such as vegetation trimming/removal, wildlife in project vicinity, that delays the project.

- Within SCE's control:
  - SCE can provide quality instruction to customers regarding requirements for completing a panel upgrade, helping customer to navigate the process.
  - SCE's planning department controls how long it takes to complete an approved design for SCE's portion of any required upgrade.

- SCE may experience delays in acquiring necessary electrical equipment needed for SCE's portion of upgrade. However, material delays are controlled by outside manufacturers or suppliers.
- SCE controls the scheduling timeframe for any planned outages required to complete the upgrade.
- SCE controls the availability of crews to perform SCE's work.

C. PG&E Individual Responses to Questions 3 - 6

Question 3: ***In an Excel spreadsheet, using data from the past five (5) years (January 2019 - December 2023), each utility shall provide an average, median, and standard deviation for the time to complete each type of upstream distribution capacity upgrade from the joint list. Include any time that projects are in a backlog. Annual Reporting Requirements. These metrics shall be reported in business days.***

PG&E's Response to Question 3:

Table A1: Energization Timelines by Upstream Distribution Capacity Upgrade Type (Calendar Days)				
Upstream Distribution Capacity Upgrade Type	**Average (day)**	**Median (day)**	**Standard Deviation (day)**	**Percentage of Instances Upgrade Type is Triggered by an Energization Request**
Substation Updates	1020.67	759.00	600.87	28.57%
Line/Circuit Updates	683.81	646.00	542.35	53.13%
New Substations	N/A	N/A	N/A	N/A

Table A2: Pre-Funding Durations Including 2024 Data (Calendar Days)			
Upstream Distribution Capacity Upgrade Type	**Average (day)**	**Median (day)**	**Standard Deviation (day)**
Substation Updates	469.05	473.50	372.05
Line/Circuit Updates	317.51	85.00	394.39

Table B1: Energization Timelines by Upstream Distribution Capacity Upgrade Type (Business Days)				
Upstream Distribution Capacity Upgrade Type	**Average (day)**	**Median (day)**	**Standard Deviation (day)**	**Percentage of Instances Upgrade Type is Triggered by an Energization Request**
Substation Updates	785.00	562.00	488.31	N/A
Line/Circuit Updates	489.41	463.00	387.40	N/A
New Substations	N/A	N/A	N/A	N/A

Table B2: Pre-Funding Durations Including 2024 Data (Business Days)			
Upstream Distribution Capacity Upgrade Type	**Average (day)**	**Median (day)**	**Standard Deviation (day)**
Substation Updates	336.05	339.50	265.94
Line/Circuit Updates	227.76	62.00	281.65

PG&E's response focuses on upstream capacity upgrade timelines, providing a comprehensive overview of the processes involved from funding to completion. The data tables also outline the duration from project identification to regulatory approval and funding. The data provided used timespan of five years, culminating in 2023 with completed projects and forms the basis for PG&E's response.

In order to express all durations, including timelines, that are considered a backlog PG&E included pre-funding duration: the time from when a project is identified till when the project is approved and funded by regulatory bodies. This time period constitutes a waiting period. It's essential to note that pre-funding durations are excluded from the upgrade timelines as the utility is not approved to start work. PG&E included this data in a separate table to illustrate the overall timeline more comprehensively regardless of whether the utility has the

needed funding to work on it. This overarching duration includes time from project identification to construction completion and would need to sum both sets of data.

It is important to note that the limited data for substation upgrades introduces variability, which is addressed by including additional data for 2024, indicated by an asterisk on the tables A2 and B2 for Substation Upgrades.

The durations encompass multiple phases, such as material sourcing, permitting, and licensing from regulatory bodies. These specific phases involve collaboration with various stakeholders, including environmental agencies, municipalities, counties, and regulatory bodies. While utilities have control over some aspects, others, like environmental permits, involve external factors and coordination efforts.

Finally, PG&E notes that the data request asked for durations to be computed in business days. PG&E's operational systems currently only have the ability to record in calendar days. PG&E believes calendar days are much more intuitive to read as the durations of capacity upgrades span years not weeks. Nonetheless, PG&E has estimated and provided business days alongside the calendar day results. Moving forward, PG&E requests that any duration request or proposal be provided in calendar days instead of business days.

Question 4: ***In an Excel spreadsheet, using data from the past five (5) years (January 2019 - December 2023), provide an average, median, and standard deviation for the time to complete energization projects that involve the following tariffs.***

- ***a. If projects fall into tariff combination categories not listed in the table below, please add them and report on the requested metrics.***
- ***b. Include any time that the projects are in a backlog.***
- ***c. Report all metrics in business days.***

PG&E's Response to Question 4:

PG&E Energization Timelines by Tariff Type				
Tariff	**Average (day)**	**Median (day)**	**Standard Deviation (day)**	**Notes**
Rule 15	580 Days	493 Days	337 Days	
Rule 16	318 Days	254 Days	233 Days	
Rule 15 and 16	475 Days	401 Days	300 Days	
Rule 29 /45	433 Days	411 Days	143 Days	
Rule 15 and 29/45	N/A	N/A	N/A	PG&E's data doesn't provide detail on these job types

Question 5: ***Using existing available data, provide the average energization timeline customers typically request when applying for energization of a new or upgraded service line, by project and customer type.***

PG&E's Response to Question 5:

PG&E began tracking customer requested energization durations in late 2022. Based on 2023 collected data, the average Customer-requested project duration was 179 days however, 63% of customers changed their requested completion date at least one time during the lifecycle of the project.

The average number of customer-requested completion date changes for 2023 was 1.5 times. It is common for customers to request a completion date they are unable to achieve with the tasks they are responsible for or for customers to provide due dates that cannot be achieved due to AHJ timeline constraints.

The table below summarizes project data from 2023 and includes the original requested completion date the customer provided when they submitted their application, and the final customer requested date on file when the project was completed.

Project Type	Original Customer Requested Duration	Final Customer Requested Duration
Agricultural	118 days	169 days
Commercial	122 days	196 days
Residential	104 days	145 days
Subdivision	147 days	215 days
Telco	137 Days	257 Days

Question 6: ***Using existing available data, describe what impact, if any, the need for a Main Panel Upgrade (MPU) has on the utilities' timing to complete an energization project. Explain how passing local government inspections and obtaining final utility connections can differ based on an MPU and what steps the utility has control over as opposed to the customer or local entities.***

PG&E's Response to Question 6:

Main Panel Upgrades can either be stand-alone projects (where the full scope of the customer's application is to upgrade their panel) or it can be part of an added load project. In the case where the customer is upgrading their panel only, these projects are handled through PG&E's Express Connections team and are generally completed in less than 90 days, (up to 30 days for customer to finalize job scope and provide any needed documentation, 60 days to scheduled and execute the work at the customer's jobsite).

In other situations, the customer submits an application for added load and in that process, it is determined a main panel upgrade is needed. The need for a main panel upgrade generally has a minor impact on the overall project timeline as PG&E and the customer work concurrently to complete the panel upgrade, while the project is moving through the design, dependency and pre-construction phases of the project. However, due to the added need for inspections and coordination with local AHJs, panel upgrades can occasionally create unforeseen delays.

If delays are to occur, they generally relate to inspections and project coordination. The utility has no control over the customer requesting panel inspections, the wait time for panel

inspections, if the city or county does them on a certain day or at a certain time, how timely the local entity sends in the pass and if they filled out the address correctly, what standards the local entity requires of the customer in order to pass an inspection, or the customer's ability to meet those requirements. There have been cases where a local jurisdiction's panel inspection requirements directly conflict with the utility (one city required the panel to be grounded to the gas riser and PG&E will not energize a panel grounded to the gas riser).

If a project requires a panel inspection and the house is currently de-energized, then PG&E will typically require the customer to have the panel inspection passed prior to the start of our construction lock down period in order to ensure that if the customer does not receive a pass on the panel inspection, we can fill that construction spot with ready work and not impact other customers.

If the customer is energized and the panel will be swapped out day of, then PG&E, the customer, and the local government agency have to work together to make sure the panel passes inspection prior to PG&E returning in the afternoon or the customer risks being out of power until the next available construction time or PG&E will have to postpone a different job in order to get back and energize the customer.

Jobs that do not require a panel inspection have one less step to clear prior to lockdown, do not require as much coordination, and don't require PG&E to wait to hear back from a local agency to get the go ahead to energize a job.

Many agencies use the PG&E meter release as a way to make sure the customer has completed all other building requirements so it is not uncommon for the panel to be ready, and the city may refuse to send the inspection to PG&E until the customer pays outstanding fees/cleans a sewer drain/changes a roofline or other local ordinance requirement. This can lead

to the customer being pushed later in the construction schedule multiple times until they secure the meter release from the AHJ.

IV. CONCLUSION

This concludes the Joint IOUs' response to the Ruling.

Respectfully submitted,

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APPENDIX

The following excel documents are attached to this submission. Due to the large size of the .xlsx files, the excel documents are only available electronically.

For SDG&E:

- *SDG&E Response to ALJ Ruling Directing Response.xlsx*

For SCE:

- *SCE – Rule 15 and Rule 16 Source Data.xlsx*
- *SCE – Rule 29 Source Data.xlsx*

For PG&E:

- *PG&E Response to March 21st ALJ Ruling.xlsx*