

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

Application of San Diego Gas & Electric Company  
(U 902 M) to Revise its 2024-2031 Energy  
Efficiency Rolling Portfolio Business Plan

Application 25-04-\_\_\_\_\_  
(Filed April 25, 2025)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-M) TO  
REVISE ITS 2024-2031 ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS  
PLAN**

**REQUEST FOR EXPEDITED SCHEDULE**

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April 25, 2025

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OFFICER VERIFICATION

ATTACHMENT A: Request for Expedited Schedule

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**I. INTRODUCTION**

Pursuant to Article 2 of the California Public Utilities Commission (CPUC or Commission) Rules of Practice and Procedure, Decision (D.) 15-10-028, D.16-08-019, and D.21-05-031, San Diego Gas & Electric Company (SDG&E) submits this Application for adoption of its revised Energy Efficiency (EE) Rolling Portfolio Strategic Business Plan and Portfolio Plan, approved in D.23-06-055.<sup>1</sup> Specifically, Ordering Paragraph (OP) 3 of D.15-10-028 states, “[a]n energy efficiency program administrator *may* file an application with a revised business plan whenever they choose.” In this Application, SDG&E seeks to discontinue regional EE program administration (SDG&E’s Plan or Application).<sup>2</sup>

D.21-05-031 established the rolling portfolio process, which requires a four-year EE portfolio plan with an eight-year strategic business plan overlay.<sup>3</sup> Typically, Program Administrators file Applications at the same time, however, given affordability concerns in the SDG&E region, coupled with the urgency around closing non-cost-effective programs in SDG&E’s EE portfolio, SDG&E is filing this Application outside of the normal cadence and

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<sup>1</sup> Due to the large file size of the corresponding Exhibits (Ex.), and pursuant to Rule 1.9, the Exhibits are available on SDG&E’s website, *available at* <https://www.sdge.com/rates-and-regulations/proceedings/Application-to-Revise-2024-2031-Energy-Efficiency-Rolling-Portfolio-Business-Plan>.

<sup>2</sup> SDG&E proposes to maintain its Codes & Standards program.

<sup>3</sup> D.21-05-031 identified required content within a Strategic Business Plan Application which was enumerated in Attachment A of D.21-05-031. *See* Rolling Portfolio Program Guidance, *available at* <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/energy-efficiency/rolling-portfolio-program-guidance>.

cycle.<sup>4</sup> This Application requests a budget *reduction* of approximately \$300 million for 2026-2031.

## II. LIST OF PREPARED DIRECT TESTIMONY EXHIBITS

Support for SDG&E's request is provided by the prepared direct testimony of Hollie Bierman and Alton Kwok. The table below lists each sponsoring witness by exhibit number and subject matter.

Exhibit #	Subject
Ex. SDG&E-01	Prepared Direct Testimony of Hollie Bierman (Update to SDG&E's 8-Year Strategic Business Plan) (2026-2031)
Ex. SDG&E-02	Prepared Direct Testimony of Alton Kwok (Update to SDG&E's 4-Year Portfolio Plan) (2026-2027)
Ex. SDG&E-03 <sup>5</sup>	Prepared Direct Testimony Workpapers of Alton Kwok

## III. SUMMARY OF RELIEF REQUESTED

SDG&E's Plan is a revision to its previously filed Rolling Portfolio Strategic Business Plan approved in D.23-06-055, which approved a budget of approximately \$500 million to support SDG&E's EE programs over the 6-year time period contemplated in this Application.<sup>6</sup> Approval of this Application would supersede previously approved budgets for 2026-2031 and result in a budget reduction of approximately \$300 million for 2026-2031. A description of each witnesses' prepared direct testimony is included below.

### **Exhibit SDG&E-01: Prepared Direct Testimony of Hollie Bierman (Update to SDG&E's 8-Year Strategic Business Plan)**

SDG&E seeks to discontinue regional program administration and to continue to provide funding to other Program Administrators as a fiscal agent. SDG&E's Plan focuses on two

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<sup>4</sup> Program Administrators are required to file Applications in February 2026 for the 2028-2035 cycle.

<sup>5</sup> Pursuant to Rule 1.13(b), creation of a searchable PDF version of Ex. SDG&E-03 is infeasible. As such, it is served in its native Excel format and is available on SDG&E's website. *Supra* n.1.

<sup>6</sup> See D.23-06-055 at Tables 7 and 9.

components: regional and statewide. As it relates to regional programs, SDG&E requests to close the majority of its regional EE programs by allowing its contracts with implementers to expire, in accordance with their existing contractual terms, which will enable SDG&E to reduce redundancies and close non-cost-effective programs. As it pertains to statewide programs, SDG&E received approval from the Commission to transfer administration of two of its statewide programs to other investor-owned utilities (IOUs) when those contracts expire.<sup>7</sup> SDG&E expects to request approval to change the lead of its remaining statewide QIQM program via Tier 2 Advice Letter in the second half of 2025. This will create statewide efficiencies by leveraging other Program Administrators who may be more capable and interested in statewide lead program administration.<sup>8</sup> To support SDG&E's Plan, SDG&E encourages the Commission to implement the following policy changes for SDG&E:

- **Compliance Framework:** SDG&E requests the Commission approve a policy framework to enable SDG&E to discontinue administering regional EE programs, thereby reducing the amount of ratepayer dollars needed to support SDG&E's EE portfolio. If SDG&E's Plan is approved, SDG&E would be alleviated from the IOU Program Administrator requirements established primarily in D.21-05-031 as SDG&E would no longer be considered an IOU Program Administrator. SDG&E also requests exemption from certain Program Administrator requirements, such as the 30% market support and equity cap established in D.21-05-031, but would continue to comply with the majority of the other obligations established therein.
- **Revised Goal Targets:** SDG&E recommends the Commission revise goal targets for SDG&E. SDG&E believes revised goal targets are authorized by the Public Utilities (P.U.) Code sections (§) 454.55 and 454.56, which state:

if the [CPUC] concludes the targets established for electrical corporations to achieve pursuant to subdivision (a) are not cost effective, feasible, or pose potential adverse impacts to public health and safety, the [CPUC] shall revise the targets to the level *that optimizes the amount of energy efficiency savings* and demand reduction and shall modify, revise, or update its policies as needed to address barriers preventing achievement of those targets.<sup>9</sup>

SDG&E's Plan describes why the Commission should revise goal targets for SDG&E in the interest of affordability and optimizing energy savings.

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<sup>7</sup> Pursuant to SDG&E Advice Letter (AL) 4494-E/3332-G, SDG&E received approval to transition the statewide Heating Ventilation and Air Conditioning program to Pacific Gas and Electric Company and the Plug Load & Appliance program to Southern California Edison Company. SDG&E expects to request approval to change the lead of its statewide Quality Installation and Quality Maintenance (QIQM) program via Tier 2 Advice Letter in 2025.

<sup>8</sup> *Id.*

<sup>9</sup> SDG&E notes that P.U. Code § 454.56 includes the same language for gas corporations.

**Exhibit SDG&E-02: Prepared Direct Testimony of Alton Kwok**  
**(Update to SDG&E's 4-Year Portfolio Plan)**

SDG&E's Portfolio Plan includes program years 2026-2027, instead of 2024-2027, because SDG&E is filing this Application midway into the 4-year cycle.<sup>10</sup> SDG&E's Portfolio Plan describes how SDG&E will continue to use the same metrics as identified in its previous Application as SDG&E discontinues regional programs. SDG&E explains how it will monitor and manage the performance of its portfolio through continuous review of individual local and statewide programs' performance via oversight of its third-party implementers. To manage program and portfolio risks, SDG&E will continue to use a combination of budget to actual variance analyses, key performance indicators (KPI), pay-for-performance compensation design, and other contract provisions to gather insight into its third-party program performance during monthly, quarterly, and annual reviews. The pay-for-performance structure and verification of performance will compensate third-party implementers for meeting and exceeding KPIs and metrics, and address performance issues, including underperformance or nonperformance, in a timely manner. SDG&E will continue to support its third-party implementers through contract expiration.

**Exhibit SDG&E-03: Prepared Direct Testimony Workpapers of Alton Kwok**

Exhibit SDG&E-03 includes prepared direct testimony workpapers associated with SDG&E's Application. SDG&E's prepared direct testimony workpapers utilize the Energy Division's excel template provided for standard Business Plan Applications.

#### **IV. REQUEST AND BILL IMPACT**

SDG&E requests the Commission approve the total budget in Column B of Table 1 below. Energy Efficiency programs are subsidized by all customers through the Public Purpose Program (PPP) rates, even though only a small portion of customers directly utilize these programs. If SDG&E's Plan is approved, SDG&E will request approximately \$300 million less to be collected through the PPP rates to support SDG&E's EE portfolio, resulting in bill reductions. SDG&E will annually update the PPP rates via an advice letter. Additionally, in

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<sup>10</sup> SDG&E's modeling, as represented in Ex. SDG&E-03 Prepared Direct Testimony Workpapers of Alton Kwok includes modifications for 2025, as compared to SDG&E's True Up Advice Letter 4302-E. See SDG&E AL 4302-E, approved and effective November 15, 2023.

accordance with D.23-06-055, SDG&E will use any prior program years' unspent and uncommitted funds to offset future revenue collections.

**Table 1**  
**Energy Efficiency Budget Comparison (2026-2031)<sup>11</sup>**

Year	(A) SDG&E Approved Budget	(B) Proposed SDG&E Budget without Regional Programs <sup>12</sup>	(C) Budget Reduction Opportunity
<b>2026</b>	\$76,226,882	\$56,298,915	(\$19,927,967)
<b>2027</b>	\$76,045,862	\$50,701,956	(\$25,343,906)
<b>2028</b>	\$85,940,881	\$22,878,445	(\$63,062,436)
<b>2029</b>	\$85,940,881	\$22,179,577	(\$63,761,304)
<b>2030</b>	\$85,940,881	\$22,197,039	(\$63,743,842)
<b>2031</b>	\$85,940,881	\$22,221,256	(\$63,719,625)
<b>Total</b>	<b>\$496,036,268</b>	<b>\$196,477,188</b>	<b>(\$299,559,080)</b>

Table 2 below is illustrative and shows the total monthly bill reduction for a typical residential customer if SDG&E's Application is approved.

**Table 2**  
**Bill Reduction per Month for a Typical Residential Customer<sup>13</sup>**

Year	Monthly Reduction in Residential Electric Bill <sup>14</sup>	Monthly Reduction in Residential Gas Bill <sup>15</sup>	Total Monthly Reduction in Residential Bill
<b>2026</b>	(\$0.16)	(\$0.62)	<b>(\$0.78)</b>
<b>2027</b>	(\$0.20)	(\$0.67)	<b>(\$0.87)</b>
<b>2028</b>	(\$0.44)	(\$0.91)	<b>(\$1.35)</b>
<b>2029</b>	(\$0.44)	(\$0.92)	<b>(\$1.36)</b>
<b>2030</b>	(\$0.44)	(\$0.92)	<b>(\$1.36)</b>
<b>2031</b>	(\$0.44)	(\$0.92)	<b>(\$1.36)</b>

<sup>11</sup> SDG&E's Plan excludes budget requests for program year 2024 as it is complete, and 2025, due to an expected Commission Decision by year end. SDG&E notes that Table 1 above excludes San Diego Regional Energy Network (SDREN) program budget.

<sup>12</sup> Includes regional Codes & Standards and costs associated with regional Industrial program activities.

<sup>13</sup> This bill reduction per month may change based upon how much of the budget is assigned to the gas PPP and electric PPP, which is subject to change in future filings, including SDG&E's Mid Cycle Advice Letter, currently due in September 2025.

<sup>14</sup> Based on current electric rates, effective February 1, 2025, via ALs 4588-E and 4588-E-A; based on a typical Non-CARE, Non-NEM, bundled inland/coastal customer using 400 kWh per month on rate schedule TOU-DR1.

<sup>15</sup> Based on current gas rates, effective February 1, 2025, via ALs 3392-G-A and 3358-G; based on a typical Non-CARE customer using 25 therms per month.

Table 3 below is illustrative and shows an example of a one-month bill and the associated bill reduction for sample commercial customers if SDG&E’s Application is approved.

**Table 3**  
**Bill Reduction Sampling for Commercial Customers<sup>16</sup>**

Customer	Sample Month Usage	Sample Month Bill Reduction Electric	Sample Month Bill Reduction Gas	Sample Month Bill Reduction Total
Large Hotel	120,943 kWh 4,156 therms	(\$230.60)	(\$557.13)	<b>(\$787.73)</b>
Medium Hotel	25,006 kWh 841 therms	(\$47.68)	(\$112.74)	<b>(\$160.42)</b>
Medium Restaurant	30,574 kWh 1,596 therms	(\$58.29)	(\$213.95)	<b>(\$272.24)</b>
Small Restaurant	4,751kWh 186 therms	(\$9.59)	(\$24.93)	<b>(\$34.52)</b>

## V. SDG&E’S REQUEST ADDRESSES AFFORDABILITY CONCERNS IN CALIFORNIA

Affordability is a major concern in the state of California, and particularly with respect to utility rates. This has recently been maintained by several regulators, intervenors, and the State of California. For instance:

- On October 30, 2024, Governor Newsom issued Executive Order (EO) N-5-24 noting “Californians’ electric rate increases have been driven largely by the cost of some programs added over time.”<sup>17</sup> The EO orders the Commission to examine all electric ratepayer-funded programs and identify programs that “may be unduly adding to rates, for which the electricity system benefits may not be justified by the costs they impose on electric ratepayers, or whose funding might more appropriately come from a source other than ratepayers.”<sup>18</sup> Lastly, it orders the Commission to “take immediate action under existing authorities to modify or sunset any underperforming or underutilized programs . . . whose costs exceed the value and benefits to electric ratepayers.”<sup>19</sup>

<sup>16</sup> This table uses a sample one-month bill from the February/March 2025 timeframe for actual SDG&E commercial customers using current electric and gas rates effective February 1, 2025 (*see* ALs 4588-E and 4588-E-A for electric and 3392-G-A and 3358-G for gas) compared to 2028 rates as proposed in this instant Application. SDG&E used proposed 2028 rates for this calculation because the impacts of SDG&E discontinuing regional programs will be most impactful beginning in 2028 after its regional programs have ended. The customer names have been anonymized for privacy purposes.

<sup>17</sup> *See* EO N-5-24 (October 30, 2024) at 1, *available at* <https://www.gov.ca.gov/wp-content/uploads/2024/10/energy-EO-10-30-24.pdf>.

<sup>18</sup> *Id.* at OP 2.

<sup>19</sup> *Id.* at OP 3; *see also* Governor’s Budget Summary 2025-26 (January 10, 2025) at 44 (stating,



- On February 18, 2025, the CPUC responded to Governor Newsom’s EO N-5-24, issuing a Report, specifically noting that EE programs include “non-cost-effective components.” Further, the CPUC notes that “all utility customers are sharing the incremental cost of programs that provide higher-cost individual benefits to a select group of customers or to private industry.”<sup>20</sup> And, while these programs can provide certain benefits, “unless there is a non-utility source of funding, the costs of these investments are divided among all customers, and bill savings for one customer necessarily increases costs for everyone else.”<sup>21</sup>
- Recently, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) issued a position paper advocating for the closure of non-cost-effective programs, and recommended the Commission increase oversight and cease approval of ratepayer funding of a significant number of programs, among other recommendations.<sup>22</sup>
- Lastly, the California State Auditor conducted an audit of the IOUs’ EE portfolios (State Audit) and found a significant number of programs reviewed were not cost-effective, leading to a recommendation that the Commission take action and “[e]nd efficiency programs that consistently fail to meet cost-effectiveness or energy-savings goals, such as by issuing a CPUC decision prohibiting utilities from using such programs in their program portfolios.”<sup>23</sup>

SDG&E’s Application addresses these concerns by proposing to close its regional programs in favor of funding statewide programs led by other Program Administrators and funding SDREN programs, pursuant to D.24-08-003.

## **VI. STATUTORY AND PROCEDURAL REQUIREMENTS<sup>24</sup>**

### **A. Rule 2.1 (a) – (c)**

This Application is made pursuant to P.U. Code Sections 451, 454, 491, 701, 728, 729, 740.4, and 795, the Commission’s Rules of Practice and Procedure, and relevant Commission

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“affordability, particularly electric bill affordability for customers in the largest electric utility territories in the state, continues to be an ongoing challenge.”), *available at* <https://ebudget.ca.gov/2025-26/pdf/BudgetSummary/FullBudgetSummary.pdf>.

<sup>20</sup> California Public Utilities Commission, CPUC Response to Executive Order N-5-24 (February 18, 2025) at 31.

<sup>21</sup> *Id.* at 5.

<sup>22</sup> See The Public Advocates Office, Addressing Underperforming Ratepayer-Funded Programs (March 12, 2025) at 43, *available at* <https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-analyses/250312-public-advocates-office-addressing-underperforming-ratepayer-funded-programs.pdf>.

<sup>23</sup> California State Auditor, The California Public Utilities Commission, Without Improving Its Oversight, the Benefits of Energy Efficiency Programs May Not Be Worth Their Cost to Ratepayers (March 2025) at 43, *available at* <https://www.auditor.ca.gov/wp-content/uploads/2025/03/2023-127-Report.pdf>.

<sup>24</sup> Because SDG&E is not proposing to increase rates through this Application, the Rule 3.2 requirements do not apply.

decisions, orders, and resolutions, including D.15-10-028. 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 public utility 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:

Leah Watts  
Regulatory Case Manager  
San Diego Gas & Electric Company  
8326 Century Park Ct.  
San Diego, CA 92123  
Telephone: 510-504-0948  
Email: lwatts1@sdge.com

with copies to:

Siobhán E. Murillo  
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8330 Century Park Court, CP32D  
San Diego, CA 92123-1530  
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Email: smurill1@sdge.com

**3. Rule 2.1 (c)**

**a. Proposed Category of Proceeding**

In accordance with Rule 7.1, SDG&E requests that this application be categorized as ratesetting.

**b. Need for hearings**

SDG&E does not believe evidentiary hearings are necessary. Instead, SDG&E believes the Commission can receive stakeholder input through the briefing process and policy issues can

be examined and resolved through written comments. However, to the extent evidentiary hearings may be required, SDG&E requests that any schedule set forth by the Commission include a procedural mechanism by which the parties can specifically identify material issues of fact in dispute that warrant an evidentiary hearing. Similarly, and pursuant to Rule 2.6 (b), any protest that requests evidentiary hearings “must state the facts the protestant would present at an evidentiary hearing to support its request for whole or partial denial of the application.” As such, and although SDG&E does not believe that evidentiary hearings are necessary, it includes hearing dates in the proposed procedural schedule below should the Commission determine that hearings are necessary.

**c. Issues to be considered**

The primary issue to be considered is whether SDG&E is authorized to close its regional programs, yielding approximately \$300 million in savings for ratepayers over a six-year period.

**d. Proposed Schedule (Expedited)<sup>25</sup>**

Pursuant to Rule 2.9, SDG&E requests an expedited schedule to ensure sufficient time to incorporate its revised portfolio status into the EE Application due in February 2026 and support a more efficient process for CPUC staff and intervenors for the 2028-2035 cycle Applications. As such, SDG&E requests the following schedule. Further, and pursuant to Rule 2.9(b) and (c), please see the corresponding Attachment A titled, Request for Expedited Schedule, for specific facts constituting the need for expedited treatment.

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<sup>25</sup> SDG&E understands that pursuant to Rule 2.9(e), the assigned Commissioner may, at their discretion, provide a different schedule in an expedited proceeding, if good cause is demonstrated by a party or articulated by the Commissioner.

Activity	Date
Application filed	April 25, 2025
Responses and Protests <sup>26</sup>	Approximately May 26, 2025
Reply to Responses/Protests	Approximately June 5, 2025
Prehearing Conference (PHC) <sup>27</sup>	As soon as permitted
Public Advocates and Intervenor Testimony/Deadline to file Motion for evidentiary hearings	July 25, 2025
Rebuttal Testimony	August 15, 2025
Meet and Confer <sup>28</sup>	August 22, 2025
Evidentiary Hearings (if necessary)/Discovery cutoff	September 1 – 5, 2025
Concurrent Opening Briefs filed	September 12, 2025
Concurrent Reply Briefs filed	September 26, 2026
Proposed Decision	On or before October 15, 2025
Final Decision	By December 31, 2025

## B. Rule 2.2 – 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 previously filed with the Commission on September 10, 2014 in connection with SDG&E Application No. 14-09-008, and is incorporated herein by reference.

## VII. SERVICE

This is a new Application. No service list has been established. Accordingly, SDG&E will electronically serve this Application, testimony, and related exhibits on parties to the service list for the following proceedings: R.13-11-005 and A.22-02-005. Electronic copies will also be served on Administrative Law Judges Fitch and Kao.

<sup>26</sup> Approximately 30 days after notice of Application appears on the Commission’s Daily Calendar.

<sup>27</sup> Pursuant to Rule 2.9(d), if expedited treatment is granted the assigned Commissioner and/or Administrative Law Judge shall notice a prehearing conference no later than 20 days from the date of preliminary categorization of the proceeding under Rule 7.1(a), and hold a prehearing conference no later than 30 days from the date of preliminary categorization. As such, the date is dependent on the categorization. Further, a scoping memo shall be issued no later than 45 days from the date of preliminary categorization.

<sup>28</sup> Pursuant to Rule 13.9.

## VIII. CONCLUSION

SDG&E requests that the Commission grant SDG&E's Application, as described herein.

Respectfully submitted,

By: /s/ Siobhán E. Murillo  
Siobhán E. Murillo

Siobhán E. Murillo  
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April 25, 2025

## OFFICER VERIFICATION

I, Dana Golan, declare the following:

I am the Chief Customer Officer of the Office of the Customer for San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing Application are true to my own knowledge, except as to matters which are therein stated 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 25th day of April 2025, at San Diego, California.

/s/ Dana Golan

Dana Golan  
Chief Customer Officer  
Office of the Customer  
San Diego Gas & Electric Company

## **ATTACHMENT A**

### **Request for Expedited Schedule**

# **ATTACHMENT A**

## **Request for Expedited Schedule**

Pursuant to Rule 2.9(b) and (c), SDG&E requests an expedited schedule to ensure sufficient time to incorporate its revised portfolio status into the EE Application due in February 2026 and support a more efficient process for CPUC staff and intervenors for the 2028-2035 cycle Applications. An expedited schedule will also allow SDG&E to begin closing regional programs promptly after Application approval. SDG&E's Application is a financial matter that must be resolved expeditiously to avoid ratepayer harm. Delays to the approval of SDG&E's Application could result in regional programs running longer than necessary resulting in a smaller budget reduction. As such, SDG&E requests the expedited schedule as identified in the Application.