

**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)
BIANNUAL ENERGIZATION REPORT**

PUBLIC VERSION

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Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY

April 1, 2025

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Pursuant to Ordering Paragraph (“OP”) 18 of California Public Utilities Commission (“CPUC” or “Commission”) Decision (“D.”) 24-09-020, San Diego Gas & Electric Company (“SDG&E”) hereby submits its first Biannual Energization Report (“the Report”). The Report is comprised of a narrative (**Attachment A** hereto) and an accompanying data spreadsheet (**Attachment B** hereto). SDG&E is concurrently submitting a motion for leave to file under seal the confidential version of the Report.

Respectfully submitted,

/s/ Roger A. Cerda

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ATTACHMENT A

SDG&E ENERGIZATION TARGET DATA AND REPORTING NARRATIVE

ENERGIZATION TARGET DATA AND REPORTING NARRATIVE

I. REPORT SUMMARY

On September 17, 2024, the California Public Utilities Commission (CPUC or Commission) issued Decision (D.) 24-09-020, aimed at establishing statewide average and maximum timelines and targets for energization requests that are conducted under the Investor-Owned Utilities (IOUs) Electric Rules and for certain upstream distribution capacity upgrades. San Diego Gas & Electric (SDG&E) hereby submits this Energization Target Data and Reporting Narrative in accordance with Ordering Paragraph (OP) 6 of D.24-09-020 (Decision).

The report supports CPUC oversight of energization timelines and compliance with statewide targets, ensuring transparency and accountability in the delivery of timely energization services. In accordance with page 59 of the Decision, SDG&E hereby provides “information describing how the timelines they track align with the energization targets adopted herein, using the data reporting tools that each large electric IOU already uses, and complying with the adopted data template by providing more individualized narrative explanations where necessary.” The information below accompanies the report workbook, providing explanations and offering context and detail to supplement the data provided for work associated with Electric Rules 15, 16, Main Panel Upgrades (MPU) and upstream distribution capacity upgrades.

As discussed in this narrative, SDG&E recommends that the Commission consider that the best representation of SDG&E’s overall energization timelines is the time between the Applicant Final Submittal (AFS) and the load energization date. When compared to the eight statewide steps for reporting, SDG&E believes that the calendar/business days between AFS and Energization most accurately reflect the energization project timeline, utilizing the most accurate data available. Absent significant and costly system enhancements, mapping SDG&E’s existing processes to each of the eight steps set forth in the Decision¹ yields many inconsistencies and unreliable data elements. The resulting total calendar/business days of each of the eight statewide steps do not accurately reflect SDG&E’s overall energization timelines. Therefore, the AFS to energization data point is included as part of SDG&E’s aggregate details in the report, and further reasoning is provided as part of the additional explanations, context, and details below.

II. BACKGROUND

In accordance with Pub. Util. Code 932 (a) (2), to meet California’s decarbonization goals, new customers must be promptly connected to SDG&E’s distribution system, and existing customers must have services upgraded in a timely manner. Senate Bill (SB) 410 and Assembly Bill (AB) 50 required the CPUC to establish reasonable average and maximum energization targets. Accordingly, the CPUC issued Order Instituting Rulemaking (R.) 24-01-018 on January 30, 2024, to implement those provisions. SB 410 also required the CPUC and all California electrical corporations to engage in activities that promote timely energization, while AB 50

¹ The eight-step energization process is discussed in Section 7 of Decision 24-09-020 and includes the following steps: Customer Intake, Engineering and Design, Customer Dependencies, Utility Dependencies, Customer Site Readiness, Large Electric IOU Site Readiness, Construction, and Service Energization Provided to Customer.

required them to meet energization timeline requirements and make changes to their distribution planning processes.

The Decision was issued on September 17, 2024, and was made effective immediately. D.24-09-020 clarifies that the intention of establishing the average and maximum energization targets timelines for the IOUs is to focus on steps within the large electric IOU's control, which can accelerate the overall energization process for customers. The Decision established eight (8) Statewide Steps to energization and differentiated IOU and customer responsibilities.

SDG&E has and will continue to play a critical role in achieving California's decarbonization goals through prompt connection to their distribution infrastructure. SDG&E has numerous enhancements in flight to enhance the customer experience, accelerate timelines, and to identify and implement system enhancements to address the granular data tracking and reporting required by the Decision. Each of these enhancements require changes to processes, systems, and roles and responsibilities, and are being assessed and implemented with the goals of maintaining affordability and without disrupting customer energization projects.

SDG&E is re-engineering energization with the goals of maintaining affordability and minimizing negative impact to customer projects and has been able to implement some operational changes that will enhance the customer experience and accelerate timelines. In furtherance of meeting the requirements of the Decision, SDG&E launched a cross-functional strategic initiative to assess opportunities for improvements. As part of this initiative, SDG&E identified seven (7) key projects it is currently pursuing to meet the goals of the Decision. Additionally, SDG&E has parallel initiatives in flight that will greatly improve the customer experience and system technology utilized by the internal teams that work on energization projects. To obtain feedback and suggestions for improvements, SDG&E has also been holding listening sessions with regional stakeholders that directly submit or are adjacent to energization projects for their feedback and suggestions for improvements. SDG&E is confident that its efforts to comply with the Decision and improve the customer experience are aligned with the intent of California's goals and will enable timely energization in a transparent and customer first manner.

The Decision's requirements for data collection and business process changes have presented implementation challenges since the Decision's effective date. Limitations on SDG&E's existing tracking and reporting systems that were in place prior to the Decision, as described in previous comments, both limit the availability of certain data for reporting and result in data that is not well-aligned with the new reporting requirements. SDG&E is providing the data that is available in accordance with its system capabilities since the Decision was approved approximately six (6) months ago. Additional changes to tracking and reporting are in flight, or will be made for subsequent reports, and SDG&E will continue to work to provide the CPUC with the requested information. These changes will inherently take time and cannot be implemented simultaneously without considerable cost and impact to timelines. The challenges SDG&E has faced, as reflected in the data, are highlighted below.

III. OBSTACLES, TRENDING INFORMATION AND REPORT FINDINGS

A. Obstacles

1. Intake Process

As described above, SDG&E's existing system predates the Decision and was not designed to achieve the granular reporting required of the Decision. SDG&E is actively exploring how best to implement system enhancements needed to meet the new requirements.

Although SDG&E's existing system and processes do not align completely with the steps for Intake in the final Decision, SDG&E is transparent with the CPUC and customers and is actively working on the changes needed for Decision implementation, tracking and reporting. SDG&E's existing system organizes a customer's service request as a "project" with multiple "jobs" falling under that project's umbrella. The Decision defines "intake" as:

the customer submits service energization request; the large electric IOU reviews customer submission, educates customer on the energization process and submission requirements; the Applicant Final Submittal (AFS) date is established. The energization clock starts once the large electric IOU notifies the customer that its application is deemed complete.

Currently, SDG&E and its customers utilize the Builder Services Portal (BSP), an online self-service web application tool where customers can request new and upgraded services and find resources to efficiently develop and manage their energization requests. The BSP is for use by both commercial and residential customers. While the BSP is built to support Accessible and Functional needs of customers, there are still customers that have preference for an alternate form of communication with SDG&E and therefore choose not to use the BSP. The BSP serves as the primary method for customer intake; however, intake may also be communicated over the phone using SDG&E's customer service line wherein customers are transferred to a specialized planning resource that can verbally facilitate intake over the phone.

Through the BSP, the customer submits a service energization request ("Customer Inquiry") that may or may not be complete. The submission may be for an activity that SDG&E is not responsible for, or the submission may not constitute a viable energization request. The date that the customer submits their request into the BSP is considered the date of the Initial Customer Inquiry. Once preliminary information is captured and an SDG&E representative determines there is a viable energization request, then a "project" is created in SDG&E's system, where data is currently stored. This project concept is often referred to as the "parent." Once the parent project is created, the Inquiry then gets passed to a project expert. At this stage, a single point of contact (SPOC) will be assigned. For some teams at SDG&E, the SPOC process is already occurring. For other teams, it is still in development.²

² SPOC implementation is in progress per Advice Letter 4547-E-A. SDG&E is working towards system enhancements to automate the SPOC requirements.

Where applicable, the SPOC then works with the customer to complete their application for the job(s) associated with the parent project. Jobs created under the parent project are referred to as the “child.” Typically, the initial Customer Inquiry contains enough information to decipher viability. However, there are exceptions to this. An example of a non-viable energization inquiry would be a customer requesting that SDG&E provide advisory services, such as a customer saying they are considering building an accessory dwelling unit (ADU) in their backyard and want to know what the cost of providing electric service would be. An example of a viable energization request inquiry would be a customer saying they are building an ADU in their backyard and are requesting energization service. Depending on the customer, the initial inquiry can contain limited information, which is why SDG&E does not consider this an application. Once viability is confirmed, a project expert will continue the Intake process and work directly with the customer to develop a “complete application” so that the job (child) can move forward to energization.

Throughout the intake period, SDG&E representatives communicate with the customer at varying degrees depending on customer needs, however the number and frequency of touchpoints are not documented. The duration of this period is of joint responsibility, as customers and SDG&E representatives partner until the energization application is substantially complete and reaches AFS. SDG&E acknowledges that the back and forth for a customer to reach AFS can be a pain point. SDG&E is making progress on developing more defined application requirements for all types of work. This will improve the customer’s experience.

2. Applicant Final Submittal (AFS)

While SDG&E historically captured the date of Initial Customer Inquiry and creation of the parent project prior to D.24-09-020, it was not intended to be directly responsive to capturing the start of Intake and does not correlate one-to-one with an application. A parent project can be comprised of many applications for jobs making it commonly a one-to-many parent to child ratio. Further, because the duration of the time between the initial customer inquiry and the end of Customer Intake has various customer dependencies, the Intake timeline across a parent project can be very extensive. In addition, it is not uncommon for customers who have a relationship with their SPOC to contact them via phone or email (outside of a formal request in the BSP). For example, a request for a relocation on the “parent” project can occur after several years. While the intake and prioritization of these jobs is still the same as a customer who uses the BSP, there is currently no tracked start date for Intake from the customer to the SPOC.³

Once all job level submission requirements are met for a particular child job level, through working with the SPOC, the Applicant Final Submittal (AFS) date is established, a job number is created, and SDG&E notifies the customer that their application for that job level is complete. SDG&E uses the AFS date as the data point for “Customer Intake End.”

SDG&E recognizes that the Commission defined “intake” as “the customer submits service energization request; the large electric IOU reviews customer submission, educates customer on the energization process and submission requirements; the Applicant Final Submittal (AFS) date is established. The energization clock starts once the large electric IOU

³ SDG&E is actively working on a solution to better track these types of inquiries.

notifies the customer that its application is deemed complete.” As noted above, SDG&E does not currently have a process that captures every customer submission at the job level. Because SDG&E’s data reporting is at the job level for Steps 2-8 of the Statewide Steps to Energization, SDG&E interpreted the reporting for the start of Intake as the creation of the job since that is when SDG&E reviews the scope, educates the customer on the energization process and submission requirements, and begins collecting all job materials (“application”). At the time of intake, SDG&E historically collected only the information that is necessary to complete the project and subsequent jobs through energization. SDG&E’s intake process, as described above, has been referenced in previous comments that SDG&E has submitted to the Commission and will continue to be refined.

B. Trending Information and Overall Report Findings

1. Reporting Parameters

Although customer dependencies are included within the end-to-end average and the parameters of the report encompass jobs initiated prior to the compliance requirement, SDG&E’s preliminary results demonstrate strong performance when averaged across all tariff groups.

SDG&E is reporting on Customer-driven Rule 15, 16, 15/16, 45, 15/45, and MPU jobs with an AFS between January 31, 2023, through December 31, 2024. This includes Rule 16 jobs that are triggered by a Rule 20 project. The data set excludes Rule 15, Rule 16, and Rule 15/16 jobs that are driven solely by SDG&E business operations. SDG&E’s source data was retrieved on March 7, 2025. It is possible that from the date of retrieval to the date of submission of this report, project statuses have changed, including energization status. SDG&E will continue to report jobs on a rolling basis biannually until Step 8 – Energization – is reached.

As noted above, SDG&E’s existing systems do not align with the Eight Statewide Steps to Energization. To report end-to-end timelines, SDG&E calculated the total time between Step 2 and Step 8. At this time, SDG&E is unable to remove customer dependencies accurately and included them in its end-to-end calculations. For SDG&E, the data point for the start of Step 2 corresponds to the AFS date. The data point for the end of Step 8 or energization is more nuanced. Because not all jobs include meters, SDG&E has implemented a multi-step reasoning check. A standardized approach for all jobs was designed to accommodate the unique variations associated with each job type:

- For Rule 15-only jobs and Rule 45, Step 8 concludes when the transformer is set because at this point the job is ‘ready for service.’ Furthermore, not all Rule 15 jobs have meters.
- For Rule 16 jobs, Step 8 concludes when the meter is set.
- For Rule 15/16 combination jobs, Step 8 concludes at the first meter set date.
- For MPU, Step 8 concludes the same day at “reconnection.”

The “Customer Desired Energization Date” that is included in the data set is based on a date provided by the customer to SDG&E during the customer intake period. Because the date is supplied by the customer and may be based on their own schedule, the date provided is oftentimes unrealistic. For example, a customer may input a random Energization date to submit

their request, or a date that is entirely infeasible. SDG&E strives to educate customers on realistic timelines and does this by partnering with the customer during the application process to develop a timeline that reflects both the urgency of the customer's request and what is feasible for the utility. As a result, the agreed upon Energization date can oftentimes change after the initial date is proposed. Tracking the changes in Energization date is not currently a system capability. SDG&E's data set therefore represents the energization date requested by the Customer in the initial inquiry, prior to the customer working with an SDG&E representative and potentially modifying the originally requested energization date during the application process.

As noted above, the data set that informed the summary tables in the aggregate tab contains Energized jobs with an AFS date between January 31, 2023, and December 31, 2024. However, many of the jobs included in the data set are not required to meet the energization targets adopted by the Decision, as the AFS dates pre-date the Decision's effective date of September 17, 2024. Therefore, most of these jobs do not fall under the compliance requirements. Nonetheless, SDG&E is reporting on all jobs that meet the reporting parameters in the aggregate.

Lastly, it is important to note that SDG&E faces additional challenges reporting timelines on "applicant design" jobs, when a third party designs the job. This is because the design portion of these jobs is often concurrent with IOU activities and may result in duplication of day counts in the data. SDG&E does not currently have the capability to track and differentiate the days for all applicant design activities.

2. Customer Requested Load

SDG&E relies heavily on customer inputs collected in BSP when customers submit an initial service inquiry. Within the BSP, customers are prompted to input estimated load for their project based on the type of service being requested. SDG&E offers guidance to support the customer by presenting equipment selections, such as tankless water heaters, EVs, solar, elevators, and AC units, along with their respective load. Customers may also manually input the estimated load in kW. This value is typically an overestimate, as the load has yet to be diversified. It may also be inaccurate, as SDG&E requests the value in kW, and it may sometimes be entered incorrectly in AMPS.

The raw load value in the initial service inquiry is then verified with the customer over the course of the job until SDG&E conducts a load study.⁴ . Currently, this raw, undiversified load value that customers submit is the only data available for query that represents the customer's requested load addition.⁵ There are also challenges with reporting on actual site capacity/load if there has not been a meter set previously, resulting in a lack of historical data. As a result, these challenges impact the data quality of the "Site Capacity & Capacity Requested"

⁴ Load study is the process where SDG&E assesses whether there is sufficient upstream distribution capacity to accommodate a customer's load request. Column M indicates whether the specific job and its associated load addition have triggered an upstream distribution capacity upgrade.

⁵ Total load is determined by the customer, often using a calculator in SDG&E's BSP. SDG&E may later adjust these values to be more accurate.

section of the workbook, which includes the following data fields: “Total Site Capacity at Time of Customer's Application for Service (kW),” “Total Site Capacity Requested (kW),” “Additional Capacity (kW) installed for future electric load deployment (as applicable),” and “Capacity Request Category: <1MW, 1MW to 2M, >2MW.” However, it is important to note that these challenges do not impact SDG&E’s ability to provide upstream distribution capacity and serve customers’ load requests. These challenges only impact the accurate reporting of load at the service level. Therefore, SDG&E is actively exploring future enhancements to more accurately capture the data points.

3. Permitting Data

SDG&E can only provide data for instances where SDG&E requires permitting, which may include multiple permits. SDG&E does not have the capability to report on customer-required permitting. Additionally, SDG&E is unable to provide the amount of time associated with permitting due to the inability to track and report on all communications between the Authorities Having Jurisdiction (AHJ) and SDG&E. Not all jobs included in the data set require permitting; therefore, some data points are marked as “N/A.” Lastly, the available data may not tell the full story: Permitting deliverable and approval requirements can be impactful to timely Energization.

IV. SUPPLEMENTAL REPORTING REQUIREMENTS

A. Constraints to Infrastructure Deployment

Several factors can serve as constraints to infrastructure deployment. SDG&E collaborates with regional partners to navigate the challenges of deploying infrastructure, which often requires approvals from various stakeholders, including regulatory bodies and environmental agencies. Unique instances, such as projects on protected land, federal property, or near airports, necessitate the involvement of multiple agencies. For example, the Federal Aviation Administration (FAA) review process for pole calculations can be extensive, and the CPUC 851 process involves several steps and can take up to 120 days. Additionally, city moratoriums can temporarily halt development to address public concerns or infrastructure needs, while the California Environmental Quality Act (CEQA) requires thorough environmental impact assessments to protect ecosystems and public health.

Customer funding constraints are a common issue. While the utility collects an engineering fee to cover its time, customers may put projects on hold due to funding. These projects remain on hold until the customer is able to move forward or decides to cancel, which impacts energization timelines. Neighboring developments or the need to secure new easements can also cause delays. If a new development shares a lot line with another property and a solution cannot be found that satisfies the neighboring lot owner, the new business job will be on hold or canceled. Finally, material procurement is impacted by factors outside of the IOU’s control but overlaps with IOU-controlled steps. Given well known issues surrounding domestic and international supply chain shortages, securing critical materials has been challenging and can significantly impact energization timelines.

With an increase in new business stemming from statewide decarbonization goals, the common goal to continue improving the customer experience, reduction in energization timelines and an increase in tracking and reporting requirements, additional staffing resources may be needed. SDG&E is in the process of evaluating, rightsizing, and upskilling its team. Some strides have already been made in this area to assign and train employees to serve as SPOCs, and we anticipate further changes may be needed.

Navigating these challenges requires careful planning, coordination, and flexibility to adapt to the various obstacles that arise during infrastructure deployment, all of which should be considered when evaluating the energization process.

B. Timeline Data Reporting

SDG&E has been intentional in designing solutions that operationalize the capability to record and collect all the data required by the Decision. SDG&E previously implemented a project management philosophy with 6 steps, which SDG&E calls “Stage Gates” that were not designed to distinguish between utility responsibilities and those of the customer. SDG&E is working to realign its business process to meet the needs of the 8 Step Energization reporting. An implementation strategy was designed to realign business units that engage in any part of the planning process. This process is ongoing, and SDG&E looks forward to realizing the results of these shifts in future reporting.

In SDG&E’s Opening Comments to the Energization OIR, SDG&E specified which of the phases are trackable. The complexities of designing, permitting, constructing, and energizing utility infrastructure are not linear in nature. Activities may be tracked and performed simultaneously, and are typically done so, to efficiently execute expedited projects. Because many of the activities throughout the energization process are performed simultaneously or concurrently for SDG&E, attempting to report a linear timeline results in challenges. While SDG&E does complete each of the IOU activities described in the 8-step energization process, the activities are not tied together in the same way presenting challenges identifying data points that detail each milestone. SDG&E identified available data points that most accurately represent the definitions shared by the Commission. Process refinement is ongoing to help data align more closely with the Commission’s definitions in the future.

An example where SDG&E is modifying its practices to align with the Commission’s definitions is the application of the term ‘rejected’ to cancelled job applications. Historically, SDG&E has not classified any application as rejected, because “rejected” would imply that SDG&E cannot meet the customer’s request for reasons within SDG&E’s control (e.g., upstream distribution capacity limitations). SDG&E takes seriously the responsibility to serve all customers and leverages relationships with regional partners to ensure that all viable projects are completed. SDG&E has historically labeled these jobs as “cancelled,” meaning that the customer’s energization project will not be moving forward for reasons outside of SDG&E’s control (e.g., customer loss of funding).

Based on the Commission’s definition of “rejected,” SDG&E is working to adjust its operations to now apply the term “rejected” to a specific subset of “cancelled” jobs. Therefore, in

the data set submitted herein, for service jobs, per the Rule 16 Tariff,⁶ SDG&E now classifies any job that does not result in an AFS within 18 months of initial request as “rejected” until systems can more accurately align with data requirements. If a job was created but lacks an AFS, it indicates that the customer was unable to provide all the necessary information, within 18 months, to proceed with their energization request.

In implementing the use of this definition, SDG&E is committed to educating customers about the scenarios that can result in an application rejection. The reasons for these rejections, manually populated by SDG&E’s staff, primarily include situations where the customer’s scope has changed resulting in a need for rejection of the original job and initiating a new, separate job or the customer has decided not to move forward with a job.

To provide the most accurate data possible, SDG&E has engaged all business units that are involved in the energization process to identify all available data points and to distinguish between customer and utility dependencies. Subject Matter Experts continue to be engaged to identify gaps and prescribe solutions to collect better data. In the case of easements and permitting, it has required close partnership with the municipalities to better understand their processes. SDG&E is committed to continuing this effort and clearly communicating its progress to customers.

C. Legacy System Data

The ability to catalog job-specific details for energization projects that do not meet or exceed energization timeline targets, are currently limited by SDG&E’s existing systems. SDG&E has indicated jobs that are known to be meeting the adopted average for the full report parameters (January 31, 2023 -December 31, 2024). However, SDG&E emphasizes that the majority of the jobs predate the compliance requirement date of September 17th, 2024, to meet these targets. If SDG&E were to utilize the compliance date and only calculate jobs with an AFS on or after September 17th, 2024, there would be no qualifying Rule 15, 16, 15/16, 45, or 15/45 energization jobs meeting or exceeding energization timeline targets at this time. Furthermore, due to system limitations, SDG&E is currently unable to provide a narrative for jobs that exceed the average or maximum energization target. Providing this data would require an overly burdensome undertaking, consisting of the manual verification of thousands of jobs. In potential future enhancements, SDG&E aims to standardize this process and related narrative data fields for consistency and simplified data collection.

D. Environmental and Social Justice Barriers and Efforts

Currently, during the customer energization request process, SDG&E does not track whether a customer’s project is in an Environmental and Social Justice (ESJ) community. Furthermore, what comprises ESJ within SDG&E’s service territory is not defined in the Decision, and SDG&E does not ask customers to self-identify during the application process.

⁶ SDG&E Rule 16-E Section A.1.A.1 “In compliance with Section 783 of the Public Utilities Code, SDG&E will apply only those construction and design specifications, standards, terms, and conditions that are applicable to a new extension of service project for the 18 months following the date the application for a new extension of service project is approved.”

The Commission has used a variety of terms that can be interpreted as “ESJ” such as “tribal,” “underserved,” Disadvantaged Community (“DAC”), “hard to reach,” “low-income,” “CARE/FERA,” etc. SDG&E has addressed the need for a more centralized definition of ESJ in other proceedings.⁷ SDG&E recommends that the CPUC provide clarification on the definition of ESJ in SDG&E’s service territory. While SDG&E can track this data once the end-user has been identified by way of billing account, wherein a tax-id, address and CARE/FERA program eligibility and enrollment are established, this data is not readily available at the time of planning a job.

SDG&E is committed to providing equitable access to energy for all. SDG&E believes that an intentional, holistic effort to reach demographics identified through Access and Functional Needs has been made. SDG&E has made significant strides in rolling out programs that support customers and contractors within ESJ categories, as summarized in this section. Given the wide scope of ESJ and the very recent implementation of D.24-09-020, we are currently able to report on existing energization related initiatives. However, SDG&E is continuously looking for new ways to further enhance its support for ESJ communities.

1. Tribal Outreach

Some barriers that exist with Tribal Nations stem from the historical injustices tribes have experienced and are captured in Executive Order N-15-19. The Bureau of Indian Affairs has the role of carrying out trust responsibility with the Tribal Nations SDG&E serves which introduces additional layers of review and approval and complexity to jobs on reservations. Many Tribal Nations we are privileged to serve require cultural monitors and safety escorts when SDG&E employees and contractors are on tribal lands, and many tribes require 5–10-day advance notice for accessing their land, which can impact construction timelines.

SDG&E values its relationship with tribal partners and strives to ensure that excavation activities respect cultural resources, which can sometimes lead to further delays and even work stoppages.

To support the unique nature of SDG&E’s relations with the tribal groups within its region, SDG&E has taken a holistic approach by assigning a set of subject matter experts to manage each tribal relationship. Through this, SDG&E has developed an understanding of how to best support what can sometimes be an under-resourced group. Relationship continuity and information sharing between cross functional teams within SDG&E – like the planning, land services, right-of-way, customer success and tribal relations teams – has allowed SDG&E to engage the entire tribal project portfolio, inclusive of commercial and residential energization projects, and assign these energy-related activities to specific and knowledgeable SDG&E resources. Regular communication during monthly meetings has provided tribes with better visibility and understanding of SDG&E’s processes.

⁷ Section 2A of SDG&E’s Opening Comments to the Assigned Commissioners Scoping Memo and Ruling of Rulemaking 19-01-011 states “It is important that the Commission consolidate customer group definitions for efficiency and effectiveness in identifying and verifying customers who qualify since EE and Energy Savings Assistance Programs have developed verification procedures.”

2. Customer Programs

SDG&E's Customer Programs, particularly its *Low-Income and Energy Efficiency Education and Outreach* program and its *Workforce Education and Training* program provide education and training to customers, contractors, and distributors to promote energy efficiency understanding and support the installation of energy efficiency and electrification equipment. These programs include special focus on ESJ communities which include (1) hard-to-reach (HTR), including multi-lingual, multi-family, renters, and/or low-income customers; (2) disadvantaged communities (DACs); and (3) tribal communities. In addition, the programs provide career-enhancing training for disadvantaged workers. Programs within the portfolios⁸ are as follows:

- a) Energy Savings Assistance (ESA) Program
- b) Residential Equity Education and Outreach
- c) Workforce Education & Training (WE&T) Learning Energy and Resources Nexus (LEARN) Program
- d) Customer Home Electrification Readiness Program (CHERP)⁹

E. Outlier Data

SDG&E's complete data set is inclusive of all outliers. However, outliers are not included in the aggregate calculation, as they would have skewed representation of the 8 Energization Steps. Some of the outlier data stems from manual data entry errors. SDG&E is working diligently to minimize data entry errors without system enhancements, but system enhancements, are necessary to provide the highest level of quality data. The following outlier data has been removed from SDG&E's aggregate calculation:

- 1. Jobs with data entry date errors such as "1/1/9999" or "1/1/2001" or "1/1/2032". These dates are explicitly inaccurate.
- 2. Jobs with negative timelines. For example, if the end date is before the start date, the data is not accurate.
- 3. Jobs with a date in Steps 1-7 that is later than the Energization date in Step 8.

V. REPORTING GAPS

SDG&E strives to provide the Commission with the highest quality data that accurately reflects timelines. SDG&E does not currently have systems that accurately track all the requested data. System enhancements will be necessary to fully and efficiently achieve this, and SDG&E is actively exploring enhancements to undertake. In the meantime, SDG&E will continue to leverage and optimize existing systems and resources as much as possible to deliver the most

⁸ For more information of the Energy Efficiency Programs please refer to SDG&E EE Annual Reports available at [Energy Efficiency Filings | San Diego Gas & Electric](#). More information on SDG&E's Low-income programs are available at [Monthly & Annual Reports | LIOB](#).

⁹ For more information on the CHERP program, please see [SDGE_ELEC_Advice-4444-E_Approved](#).

complete dataset possible while keeping affordability in mind; certain data fields in the workbook are unavailable, limited, and/or unreliable.

SDG&E anticipates data availability and accuracy to increase, but there are several steps needed for that to occur and be visible in reporting. It will take time to develop and implement necessary system enhancements. After system enhancements are implemented, data collection via the new systems will begin. It will take time to phase out in-flight projects, collect data in the new systems, and to see the full benefits over the lifecycle of a job. There is inherently a bit of a delay from when data is collected to when it is reported. This is because reporting periods are six months and end three months prior to reporting, which is necessary for data processing and report development.

A. Data Availability

Due to the unavailability or unknown status of certain data at the time of the report, SDG&E utilizes the terms “Not Available,” “N/A,” and “Unknown” in the report to clarify the status of data. “Not Available” is used for any data field that is not available for this filing due to system limitations. “N/A” signifies that the data field is not applicable to the specific job due to its status or work type. “Unknown” is used where it is uncertain if a date or cost will be available, primarily resulting from pending or incomplete data in SDG&E systems.

1. Overall Data Accuracy

Certain sections of the report are completed to the best of SDG&E’s ability with its existing systems and manual data reviews, recognizing that many data points may be unreliable. In specific areas of the report, such as MPU-specific end-to-end data, costing components, and the 8 Step timelines, there are large amounts of unknown and unavailable data. Consequently, the accuracy of these sections is limited. Further, while some data does not appear to be missing, such as in the 8 Steps and concurrent steps, SDG&E emphasizes that the accuracy of this data is constrained by system limitations. For example, SDG&E’s system does not currently track overlapping durations or most delays. Additionally, customer-provided data, such as desired energization dates and changes in project scope, further impact the accuracy and reliability of the data. As previously mentioned, system enhancements are necessary to improve data completeness and accuracy.

2. Costs

Even at the time of energization, many actual or estimated costs have yet to occur or to be calculated; therefore, they remain unknown. The full costing process, or financial reconciliation process, can take over 6 months from the time of Energization. For this reason, there is a significant amount of unknown data under the costing components section of the report. Further, depending on the type of work and the associated billing code, no cost report is generated to calculate estimated values. Therefore, this data is currently unavailable. Further, at this time, SDG&E’s system limitations do not allow for reliable retrieval of granular data related to costs. When SDG&E’s cost system is queried, materials are encompassed in a single line item called “materials.” Similarly, a single line item called “staffing and labor” represents a loaded cost, inclusive of both hourly and salary wages and benefits. Moreover, providing “actual costs at the

time of energization” is not a final, static cost, as trailing invoices can be received up to six months later.

3. Eight Steps

As discussed throughout this narrative, there are numerous complexities with mapping SDG&E’s existing phases and project milestones to the 8 steps and particular challenges with tracking and reporting concurrent steps. For this reason, much of the data provided on the various steps is limited in availability and/or accuracy. Additionally, some system data entries may be missing, resulting in erroneous dates and duration calculations in reporting. These missing or erroneous data points affect the reporting of the data point start and end dates, concurrent steps, associated summations, and the narrative on exceeding timelines. Certain SPOC requirements within the 8 steps, such as rescheduling of work, are not currently tracked and require burdensome, and unreliable, manual tracking. Further enhancements are required for noticeable improvement to these sections and to avoid excessively burdensome and manual data processing.

4. Delays

SDG&E has not historically been required to track or report on “delays,” especially delays that are the result of the customer. Therefore, for the current report, information related to delays is based on assumptions tied to SDG&E’s existing phases that can align with customer delays. For example, if there are multiple AFS dates and multiple design dates, the assumption is that the customer changed scope, including their design, but that is not guaranteed without looking into the specifics of the job. These types of changes could “delay” a job from moving forward. Since reporting on delays has a heavy reliance on customer dependencies, which SDG&E currently does not have a way to track, the associated data is likely misrepresented.

VI. CONCLUSION: DATA & REPORTING INSIGHTS

Continuous improvement in customer experience, reduced energization timelines, and providing the CPUC with the data requested per the Decision is a top priority for SDG&E. Cross functional teams at SDG&E have invested significant amounts of time, energy, and effort into preparing this report, improving the customer experience, and reducing timelines. The people, systems, and processes that support energization are complex and SDG&E continues to assess and implement changes in furtherance of the spirit of the Decision, while minimizing cost to ratepayers and potential negative impacts to customers who currently have projects with SDG&E.

SDG&E emphasizes that the AFS to energization data provided in its aggregate summary is the best representation of current timelines. Even while customer dependencies and circumstances outside of SDG&E’s control are still calculated within the aggregate, the average value remains a sufficient benchmark. When looking at the aggregate summary as representative of SDG&E’s efforts, it highlights the organizational efforts already occurring prior to the compliance requirements outlined in D.24-09-20. The data also highlights the additional efforts SDG&E must take, and is already undertaking, to enhance the process.

SDG&E remains committed to supporting California's decarbonization goals by providing customers with timely connections and upgrades to its distribution system. Despite the challenges posed by increased data collection and reporting requirements, SDG&E has already made significant strides in enhancing the customer experience and accelerating energization timelines. SDG&E will continue to address implementation opportunities and system limitations to meet the requirements of the Decision.

ATTACHMENT B

SDG&E BIANNUAL ENERGIZATION DATA SPREADSHEET

Due to its size, this attachment is only being provided electronically as an Excel spreadsheet. The attachment is available at the following location:

<https://www.sdge.com/rates-and-regulations/proceedings/Order-Instituting-Rulemaking-to-Establish-Energization-Timelines>