

**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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SAN DIEGO GAS & ELECTRIC COMPANY

September 30, 2026

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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 September 30, 2026 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,

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September 30, 2026

ATTACHMENT A

SDG&E ENERGIZATION TARGET DATA AND REPORTING NARRATIVE

Table of Contents

- I. Report Summary
- II. Background
- III. Obstacles, Trending Information and Report Findings
 - A. Obstacles
 - 1. IT System Enhancements
 - B. Trending Information and Overall Report Findings
 - 1. Reporting Parameters
 - 2. Customer Requested Energization Date
 - 3. Customer Requested Load
 - 4. Permitting Data
- IV. Supplemental Reporting Requirements
 - A. Upstream Capacity Upgrade Projects
 - B. Constraints to Infrastructure Deployment
 - C. Timeline Data Reporting
 - D. Legacy System Data
 - E. Environmental and Social Justice Barriers and Efforts
 - 1. Tribal Outreach
 - 2. Customer Outreach
 - F. Outlier Data
 - G. Staffing Analysis
- V. Reporting Gaps
 - A. Data Availability and Data Quality
 - B. Cost Reporting Limitations
 - C. Eight Steps
 - D. Delay Attribution and Reporting
- VI. Conclusion: Data & Reporting Insights

Staffing Analysis Attachment

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 (Decision), which established statewide average and maximum timelines and targets for energization requests processed under the Investor-Owned Utilities (IOUs) Electric Rules as well as for certain upstream distribution capacity upgrades. In compliance with Ordering Paragraph (OP) 6 of D.24-09-020, San Diego Gas & Electric (SDG&E) hereby submits this Energization Target Data and Reporting Narrative.

This 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 D.24-09-020, 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.

SDG&E remains committed to enhancing the overall customer experience through enhanced communication, greater transparency, and more seamless engagement; elements that may not directly correlate with accelerated timelines. In tandem, SDG&E has implemented several process and system improvements aimed at streamlining energization workflows within the constraints of SDG&E’s current legacy systems. In the absence of an approved authorized funding mechanism, these improvements have been made within the bounds of existing resources; however, they do not fully achieve the requirements set forth by the Commission in D.24-09-020. In order to fully meet the granular tracking and reporting and enhanced communications required by D.24-09-020, modernizing and automating legacy systems is necessary.

II. BACKGROUND

In accordance with Public Utilities 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 seeking to add load 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 required them to meet energization timeline requirements and make changes to their distribution planning processes.

D.24-09-020 was issued on September 17, 2024, effective immediately. The Decision 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, and acknowledged that IOU and customer responsibilities are not always sequential, and at times are conducted concurrently. In addition to setting average and maximum timelines, D.24-09-020 established new tracking and reporting requirements for each of the IOUs, as well as specific IOU requirements for customer outreach and communications to enhance transparency.

SDG&E has and will continue to play a critical role in achieving California's decarbonization goals through prompt connection to its distribution infrastructure. As described in subsequent sections of this narrative, SDG&E continues to pursue enhancements to customer experience, accelerate energization project timelines, and systematically track and report on requirements mandated by D.24-09-020.

SDG&E has parallel initiatives underway to enhance the customer experience and, within existing resources and funding, modernize the systems utilized across the numerous internal teams involved in energization projects. As part of these efforts, SDG&E routinely solicits feedback from external stakeholders that are representative of builders, contractors, affordable housing developers, and others engaged with our energization process to gather feedback on customer needs and areas for improvement across all tariff types covered by this report. SDG&E also surveys customers who have recently completed energization projects to obtain additional insights. This ongoing stakeholder feedback allows SDG&E to continuously adjust its processes and drive ongoing improvements. The input received helps SDG&E identify emerging customer needs, refine operational workflows, and further enhance transparency and communication throughout the energization process. These insights have informed an actionable plan aligned with the Decision's compliance requirements, and highlight the need for technology improvements across multiple internal teams, systems, and manual processes utilized today to energize projects.

III. OBSTACLES, TRENDING INFORMATION AND REPORT FINDINGS

A. Obstacles

1. IT System Enhancements

The Decision introduces expanded requirements for tracking, reporting, and communicating energization timelines and project status, which exceed the capabilities of SDG&E's current systems. SDG&E remains unable to fully populate the reporting requirements and meet the full compliance requirements of D.24-09-020 absent significant system investments. SDG&E continues to highlight a critical need for IT system enhancements to meet the requirements outlined in D.24-09-020. Existing gaps in data tracking and transparent communications have been acknowledged by both SDG&E and the CPUC. These gaps include but are not limited to limitations in disaggregating IOU and customer time within a project lifecycle, communicating energization timelines according to the eight steps, and enhancing the

tracking of all customer communications. Please see the Reporting Gaps section below for additional information regarding IT System Enhancements.

SDG&E remains committed to implementing these requirements to the extent feasible within existing constraints. It is important to acknowledge that these activities were not previously scoped or funded within current GRC authorized budgets or authorized as part of SDG&E's incremental funding application¹.

B. Trending Information and Overall Report Findings

1. Reporting Parameters

SDG&E is reporting on Customer-driven Electric Rule 15, 16, 15/16, 45, 15/45, and Main Panel Upgrade (MPU) jobs with a completed application between January 31, 2023, through June 30, 2026. The data set includes jobs initiated prior to the issuance of the Decision. The data set excludes solar-only jobs; Rule 15, Rule 16, and Rule 15/16 jobs that are driven solely by SDG&E business operations; and Rule 16 jobs that are triggered by a Rule 20 project. SDG&E's source data was retrieved on July 1, 2026. It is possible that from the date of retrieval to the date of submission of this report, project statuses have changed, including energization status. In accordance with updated guidance received from the CPUC, SDG&E will continue to report jobs (active and energized with a completed application date on or after January 31, 2023) on a rolling, biannual basis or until the CPUC issues revised guidance.

As previously described, existing system limitations prevent SDG&E from fully reporting the timeline metrics in a manner consistent with CPUC requirements. To support the CPUC's goals and reporting transparency, until the necessary system enhancements are implemented and data is consistently and accurately collected, SDG&E is providing an end-to-end timeline metric. To report end-to-end timelines, SDG&E calculated the total time between Step 2 and Step 8². At this time, SDG&E is unable to remove customer dependencies accurately, so they are included in the end-to-end calculations. For SDG&E, the data point for the start of Step 2 corresponds to receiving a complete application (AFS). The data point for the end of Step 8 ("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.'
- For Rule 16 jobs, Step 8 concludes when the meter is set, if a meter is required for the job.
- For Rule 15/16 combination jobs, Step 8 concludes at the first meter set date.

¹ Decision 25-10-034

² Step 1 (intake) begins with an individual job creation when an initial request is received and ends when a completed application is received to establish the applicant final submittal (AFS). The AFS established date (start of Step 2) is when the energization timeline begins.

- For MPU, Step 8 concludes the same day as “reconnection.”

As noted above, the data set that informed the summary tables in the aggregate tab contains energized jobs with a completed application date between January 31, 2023, and June 30, 2026. However, many of the jobs included in the dataset pre-date the energization targets adopted by the Decision, as the completed application dates were established prior to the Decision’s effective date of September 17, 2024.

2. Customer Requested Energization Date

The “Customer Desired Energization Date” included in the data set is derived from the date provided by the customer to SDG&E during the initial request. As this date is customer-supplied, it is often aspirational and may not reflect the practical constraints or requirements associated with the customer’s project execution. For example, a customer may enter a placeholder energization date in an effort to submit their request, or a date that is entirely infeasible. SDG&E engages with customers during the application process to align expectations and establish realistic timelines. This collaboration helps reconcile customer urgency with utility feasibility. Consequently, the originally submitted Customer Desired Energization date is often revised. Tracking the changes in the desired energization date is not currently a system capability, and therefore SDG&E’s data set represents the energization date requested by the customer in the initial inquiry, prior to the customer working with an SDG&E representative. The date does not reflect any modifications or adjustments agreed upon with the customer during the application process.

3. Customer Requested Load

SDG&E’s data collection for customer requested load estimates is primarily driven by inputs submitted through the Customer Energization Portal during the initial service inquiry. Customers are prompted to provide estimated electrical load based on the type of service requested. Customers manually input the estimated load in kW. These initial estimates often represent potentially inflated values, as they are provided prior to any formal load study. Additionally, data accuracy may be compromised if customers mistakenly enter amperage values instead of kW, despite the portal’s request for kW input. Throughout the project lifecycle, SDG&E engages with customers to validate and refine the load estimate, culminating in a formal load study.³ At present, the undiversified load value submitted during the initial inquiry remains the sole data point available for querying the customer’s requested load addition.⁴

In cases where a meter has not been installed, the absence of historical site data further complicates efforts to report actual site capacity. These limitations directly affect the data quality

³ Load studies are submitted to SDG&E’s distribution planning team to evaluate whether sufficient upstream distribution capacity exists to accommodate a customer’s load request. Column M of the dataset indicates whether the specific job and its associated load addition have triggered an upstream distribution capacity upgrade.

⁴ Total load is determined by the customer, often using a calculator in SDG&E’s Customer Energization Portal. SDG&E may later adjust these values to be more accurate.

of the “Site Capacity & Capacity Requested” 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)”
- “Capacity Request Category: <1MW, 1MW to 2MW, >2MW”

It is important to note that these data quality challenges are confined to service-level reporting and do not impact SDG&E’s ability to provide upstream distribution capacity and serve customers’ load requests. To improve accuracy and reliability in future reporting, SDG&E is actively evaluating enhancements to its requested capacity load and data collection and validation processes.

4. 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 visibility into or reporting capability for 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 SDG&E permitting; therefore, some data points are marked as “N/A” (Not Applicable). Permitting requirements and approval processes that are not captured in the data can significantly affect Energization timelines. Permit review periods, inspection scheduling, and jurisdictional coordination activities, many of which occur outside SDG&E’s direct control, may influence overall energization readiness from the customer’s perspective.

IV. SUPPLEMENTAL REPORTING REQUIREMENTS

A. Upstream Capacity Upgrade Projects

In accordance with the Decision, SDG&E has identified the energization projects with upstream capacity upgrade dependencies in Appendix B.⁵ For this September 30, 2026, filing, SDG&E reports four upstream distribution capacity upgrades that were triggered by ongoing energization requests and two upstream distribution capacity upgrades included in the tariff closed tab. For each upgrade, SDG&E provides the date the need for the capacity upgrade was

⁵ D.24-09-020, pp. 48 - 49.

identified,⁶ the date the upgrade was completed (if applicable), and the total associated costs for completed upgrades.

B. Constraints to Infrastructure Deployment

Infrastructure deployment is subject to a range of constraints that impact project timelines and execution. SDG&E collaborates with regional partners to address these challenges, which often involve navigating complex permitting and approval processes across multiple regulatory and environmental entities. Projects located on protected land, federal property, or within close proximity to sensitive areas such as airports typically require multi-agency coordination. For example, the Federal Aviation Administration (FAA) conducts detailed reviews of pole height calculations, which can be extensive. Similarly, permits required by Caltrans may take many months to be processed and approved as well as municipal moratoriums may also temporarily suspend development to address public concerns or infrastructure needs.

Customer funding is another constraint to deployment. It is not uncommon for customers to put their projects on hold at various stages in the project lifecycle due to changes in their funding. These projects could remain on hold for an extended period until the customer is able to acquire funding to move forward or until the customer decides to cancel, either of which can impact energization timelines and execution.

Land rights considerations, including the need to obtain new easements or secure agreements with neighboring property owners, can also delay customer projects. For example, when a proposed development requires access across or adjacent to another property, and the necessary property rights or agreements cannot be obtained, the project may be delayed, placed on hold, or ultimately canceled. Finally, material procurement presents another critical constraint, often influenced by factors outside of the IOU's control but overlapping with IOU-controlled steps. Challenges surrounding domestic and international supply chain shortages can intersect with project milestones and have the potential to significantly delay the availability of essential components, thereby affecting energization timelines.

In response to an increase in new business driven by statewide decarbonization goals combined with the shared objectives of improving the customer experience, reducing energization timelines, and meeting expanded tracking and reporting requirements, SDG&E is actively implementing ways to optimize existing resources and enhancing its operational capabilities to best support the increase in new business demand.

C. Timeline Data Reporting

Although SDG&E performs each of the IOU-controlled steps described in the 8-step energization process, the underlying systems do not track these IOU-controlled steps and

⁶ SDG&E does not separately track the specific date on which an upstream capacity upgrade is formally “identified,” as there are often iterative discussions with customers to align load requests and project timelines, which can refine or adjust the upstream capacity requirements. For purposes of this report, SDG&E has identified and reported the date on which the upstream capacity need was initially flagged through engineering studies or project reviews.

associated sub-step activities as a single end-to-end workflow. As a result, it is challenging to identify and report data points associated with each individual milestone. SDG&E identified the available data points that most closely align with the definitions prescribed by the Commission. Process and data enhancements are ongoing to support greater alignment with those definitions in future reporting.

To provide the most accurate reporting possible, SDG&E has engaged business units across the energization process to identify available data sources and align reporting with Commission-defined metrics. Subject matter experts continue to evaluate process and data enhancements to improve future reporting and reduce data gaps.

As of the current reporting period, SDG&E has developed solutions as outlined in Table 2 “Estimated IT System Enhancement Implementation” and is also implementing solutions where ongoing data gaps have been identified and quick fixes are available. Simultaneously, SDG&E continues its effort to develop and refine processes to address areas where more complex solutions are needed. SDG&E is committed to continuing this effort and clearly communicating its progress with customers.

D. Legacy System Data

The ability to catalog job-specific details for energization projects that exceed energization timeline targets is currently limited by SDG&E’s legacy systems. As presented in the aggregate summary, SDG&E has indicated jobs that are known to be meeting the adopted average for the full report parameters (January 31, 2023 -June 30, 2026). However, SDG&E emphasizes that many of the jobs pre-date the issuance of the Decision (September 17th, 2024). Furthermore, due to system limitations, SDG&E is currently unable to provide a narrative for each job that exceeds the average or maximum energization target since IT system enhancements are still needed to determine these statuses. In potential future enhancements, SDG&E aims to standardize this process and related narrative data fields for consistency and simplified data collection.

E. 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 and does not ask customers to self-identify during the application process. 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 currently incorporates underserved community indicators into its project reporting through its Geographic Information System (GIS). This system enables the identification of projects that meet criteria outlined in Public Utilities Code Section 1601(e), and this information has been included within this report. Specifically, SDG&E’s GIS platform integrates the following data sources and methodologies:

- **Section 1601(e)(3):** SDG&E identifies projects located within areas designated as among the most disadvantaged 25 percent in the state, based on the most recent CalEnviroScreen data published by the California Environmental Protection Agency.
- **Section 1601(e)(4):** SDG&E identifies communities in which at least 75 percent of public-school students in the project area are eligible to receive free or reduced-price meals under the National School Lunch Program. This is achieved by overlaying school district data with project geographies.

SDG&E is committed to providing equitable access to energy for all and continues its efforts to reach customers fitting the demographics identified through Access and Functional Needs. When reviewing the average energization timelines for jobs within all ESJ community types, the data suggests similar energization timelines as Non-ESJ Communities.

Table 1⁷

Community Type	Tariff Energized Job Count	Average Applicant Final Submittal (“AFS”) to Energized (Business Days) by Tariff	MPU Energized Job Count	Average Applicant Final Submittal (“AFS”) to Energized (Business Days) by MPU
ESJ Community	8221	112	4247	84
Non-ESJ Community	4037	112	3065	69

1. Tribal Outreach

Tribal Nations may face unique challenges that affect project timelines and timely energization. The Bureau of Indian Affairs maintains trust responsibilities for Tribal Nations served by SDG&E, which can introduce additional review and approval requirements for projects on tribal lands. For example, projects can face land access, easement acquisition, and permitting requirements that are unique to reservation land. Many Tribal Nations require that SDG&E coordinate for 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

⁷ Table 1 includes energized jobs only, and excludes outliers as defined in Section E “Outlier Data.”

partners and strives to ensure that excavation activities respect tribal sovereignty and environmental resources, which can sometimes lead to further delays and even work stoppages.

To help address barriers and support Tribes with a consistent single point of contact (SPOC) in planning their project(s)⁸, a dedicated Project Manager and Project Planner has been assigned to each tribe that SDG&E serves. These designated contacts provide consistent guidance and support throughout the entire project lifecycle from initiation through energization. To further streamline coordination, all tribal new business projects are managed within a single project planning team.

In addition, SDG&E has worked closely with Tribal Nations to collaborate on the development of a more efficient process for coordinating site access. By establishing clearer communication pathways and streamlined procedures with tribal partners, SDG&E can now field jobs more quickly and schedule crews sooner.

Finally, SDG&E has implemented monthly meetings with tribal representatives to review processes, discuss project updates, and maintain open communication. These efforts have strengthened partnerships, improved transparency, and created more efficient and responsive workflows.

To help reduce barriers to timely energization and 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. As a result of these efforts, SDG&E has gained valuable insights into effectively supporting customers residing within tribal reservations.

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.

2. Customer Outreach

Through customer listening sessions, SDG&E identified a consistent theme: customers seek a single, reliable source of information to understand, manage, and navigate their energization projects from initiation through completion. In response, SDG&E has reassessed the role of the Customer Energization Portal and is evolving it into a more robust, intuitive, and self-service oriented platform that supports customers throughout the project lifecycle.

As previously described, SDG&E implemented enhancements to the Customer Energization Portal landing page to address early customer confusion around how to initiate requests and what information is required. The redesigned landing page now presents the eight statewide steps to energization, clearly delineates SDG&E and customer responsibilities, and

⁸ Per SDG&E's Customer Engagement and Communication Plan outlined in Advice Letters 4547-E and 4547-E-A

provides timeline expectations aligned with the Decision. Additional educational content, guided prompts, and self-help tools, including the SDG&E virtual assistant, were added to help customers independently submit more complete requests, identify points of contact, and check project status.

Building on this foundation, SDG&E is advancing several key enhancements intended to further establish the portal as a centralized, self-service platform and singular reference point for all project-related information and communications. Most notably, SDG&E has developed two-way messaging functionality, targeted for rollout by the end of 2026, which will allow all communications between customers and SDG&E representatives to flow directly through the portal. This enhancement will improve transparency, reduce fragmented communications, and provide a shared, auditable record for all parties involved.

Additional portal enhancements under evaluation or development include improving document management capabilities to allow customers to upload larger file sizes required by planning teams to accurately evaluate customer projects, as well as enhancements to the milestone tracker.

Outside of the portal, SDG&E is also focused on improving the overall customer experience by analyzing the most common reasons customer requests for service are returned or paused by internal business units as they move through the pipeline - an area customers identified as particularly frustrating. Insights from this analysis are being used to inform process improvements, reduce rework, and increase clarity earlier in the customer's project lifecycle.

In parallel, SDG&E has implemented targeted improvements to its current customer phone systems. These updates were implemented while SDG&E advances a broader modernization of its telephony platform. SDG&E has transitioned to Amazon Connect, a cloud-based contact center solution that will further enhance the customer experience through:

- Intelligent, self-service routing
- Real-time insights and reporting
- Flexible, cloud-based solutions

SDG&E continues to strengthen continuity and coordination across teams supporting customer projects through standardized documentation, QA/QC checklists, and clearer handoff practices. These efforts, supported by a dedicated team focused on customer experience, intake coordination, and escalation management, as well as increased use of the Customer Energization Portal, are designed to reduce rework, improve accountability, and provide customers with a more consistent and transparent experience throughout the energization process.

F. Outlier Data

SDG&E's complete data set is inclusive of all outliers and are marked accordingly in Column CR of Tariff Closed and Tariff Ongoing tabs of the data report. Outliers, however, are

not included in the aggregate timeline calculations, as they would have skewed representation of the 8 Energization Steps. For the September 2026 report, outlier criteria is defined as:

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.
4. Projects with incomplete status verification: marked as “complete” but missing construction or energization dates, preventing confirmation of closure.
5. Projects with durations exceeding two standard deviations above the energized job population average and by tariff type.

Some of the outlier data stems from manual data entry errors. SDG&E is working diligently to minimize data entry errors and will require system enhancements to further these efforts in order to provide the highest quality data. When an outlier is identified within the data for a specific project, only the impacted data from that project is excluded from any aggregate calculations that rely on the affected field. However, the data fields for that project which are not impacted by the outlier remain included in the overall calculations. Accordingly, outlier data has been removed from the Aggregate tab of the report when applicable.:

G. Staffing Analysis

SDG&E has completed a comprehensive staffing analysis consistent with the requirements of California Public Utilities Code Section 935(a). This analysis, which supports SDG&E’s implementation of the Energization Decision, was filed in its General Rate Case in June 2026 and is provided as an attachment to this report.

V. REPORTING GAPS

SDG&E strives to provide the Commission with the highest quality data that accurately reflects timelines during the reporting period while operating within its approved funding limits. SDG&E does not currently have systems that accurately track all the data required by the Decision. Currently, certain data fields in the workbook are unavailable, limited, and/or unreliable and will continue to be unavailable until necessary IT enhancements are implemented. SDG&E has identified the necessary IT systems that must be upgraded or implemented to address the data gaps and the data accuracy. As these IT system improvements were not anticipated at the time of SDG&E’s 2024 GRC application, the associated costs constitute an incremental requirement; i.e., SDG&E does not have existing funding authority to make the system enhancements necessary to provide this data. SDG&E will continue to leverage and optimize existing systems and resources as much as possible to deliver the most complete dataset it can with available resources.

SDG&E anticipates data availability and accuracy to increase, but there are several steps needed for that to occur and be visible in reporting. 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, visualize that data, and see the full benefits over the lifecycle of

a customer's project. There is an inherent delay between data collection and reporting. This is because reporting periods are six months and the reporting periods end three months prior to when the data for the reporting period becomes available. Three months are needed for data processing and report development. Data collection will commence once IT system enhancements have been completed. Given that data is pulled three months prior to each reporting cycle, and reports are submitted on a biannual basis, the initial appearance of new, relevant data in the Energization Report is expected to occur within three to nine months post-implementation of relevant IT system enhancements. The precise timing will be dependent on the alignment of the reporting cycle with the date of the IT system enhancement deployment. For data points collected later in the project life cycle, a longer duration will be required before the data will appear in reports. For example, in order to accurately report on projects that exceed the maximum energization targets, SDG&E must first be able to accurately track IOU dependent timelines without customer-related dependencies. Once this tracking capability is established, a project must then proceed through its full lifecycle, with the IT system enhancement in place, and exceed the maximum energization target before there is any reliable data to report. As an example, a Rule 15 project would need to exceed 357 calendar days (245 business days) plus time for any customer dependencies to be considered beyond the maximum energization target. Therefore, reliable data on these scenarios may not be available until more than a year after the IT system enhancement is implemented.

SDG&E has proposed IT Enhancements designed to support the compliance requirements adopted by D.24-09-020. These enhancements are critical to enabling system-wide improvements to the energization process and are directly attributable to SDG&E's obligation to implement Commission-directed changes that improve transparency, reduce timelines, and enhance tracking capabilities.

The estimated implementation timelines included in the following tables below for IT Enhancements are based on the best available information at this time. SDG&E will continue to evaluate its business needs and compliance obligations to optimize efficiency while maintaining a focus on affordability. These timelines are subject to change as new information becomes available, Commission directives change, or priorities evolve. SDG&E remains committed to fulfilling the requirements of D.24-09-020 and will continue to assess and prioritize system improvements as funding allows.

Table 2 – Estimated IT System Enhancement Implementation⁹

Data Point	Data Sheet	Est. Completion Date
Estimated timing for when customer anticipates additional capacity necessary as indicated on customer's application (Date)	Tariff Data	11/30/2026
Total additional kW capacity for the necessary future upgrade as listed on customer's application (kW)	Tariff Data	10/30/2026
Date of IOU rejection of application (Date)	Tariff Data	10/30/2026
IOU reason for rejection of application (Reason)	Tariff Data	11/30/2026
Project triggered for upstream capacity project (Yes/No)	Tariff Data	03/28/2027
Date IOU completes the upstream capacity project (Date)	Tariff Data	03/28/2027
Time to complete upstream capacity project (Calendar Days)	Tariff Data	Complete
Identify when in the energization process the customer requested a change in design or scope (Date)	Tariff Data	Complete
Customer cancelled/delayed project (as needed) (Yes or No)	Tariff Data	Complete
Step 3 - Data Point Start		
3) Customer Dependencies Start (Date)	Tariff Data	03/28/2027
Step 3 - Data Point End		
4) Customer Dependencies End (Date)	Tariff Data	03/28/2027
Step 4 - Data Point Start		
4) Utility Dependencies' Start (Date)	Tariff Data	03/28/2027
Step 4 - Data Point End		
5) Utility Dependencies End (Date)	Tariff Data	03/28/2027

⁹ Some data points are currently reported manually or through legacy systems.

Location of project exceeding the maximum energization target: Location (circuit level)	Tariff Data	TBD ¹⁰
R15/R16/R29/R45 Energization Average meeting/exceeding Average Energization Target (Meeting/Exceeding)	Tariff Data	TBD
R15/R16/R29/R45 Energization Maximum meeting/exceeding Maximum Energization Target (Meeting/Exceeding)	Tariff Data	TBD
R15/R16/R29/R45 Energization Reasoning as to why exceeded average/maximum Energization Target (Reasoning)	Tariff Data	TBD
Amount of load (kW) provided to applicant using flexible service options ¹¹ (kW)	Tariff Data	N/A
At the time energization provided, remaining (or total) unserved load requested by the applicant (kW)	Tariff Data	N/A
Estimate when full service will be provided to the applicant for customers using flexible service and/or receiving tiered load schedules (Date)	Tariff Data	N/A
Size of Installed Main Panel Upgrade (Amps)	MPU Data	11/30/2026
Reason why upgrade was cancelled and/or rescheduled (Reason)	MPU Data	09/30/2026
Main Panel Upgrade - Rescheduled Date (as needed) (Date)	MPU Data	09/30/2026
Additional Time from Initial Scheduled Date to Rescheduled Date (Calendar Days)	MPU Data	09/30/2026
Additional Time from Initial Scheduled Date to Rescheduled Date (Business Days)	MPU Data	09/30/2026

¹⁰ To Be Determined (TBD) denotes that the completion date for the IT system enhancement has not yet been established. The timeline remains undetermined pending the availability of funding necessary to advance this work.

¹¹ Per Decision 26-02-025, *Decision Establishing a Standard Offer for Flexible Service Connections*, SDG&E was not directed to implement or offer a standard-offer Flexible Service Connection. Accordingly, the associated reporting data points have not been prioritized for development at this time.

The Average Energization (Meeting/Exceeding Target), Maximum Energization (Meeting/Exceeding Target), and Reasoning for Exceedances data points are dependent on multiple underlying data elements necessary to calculate complete energization timelines. While CPUC energization timeline requirements apply specifically to IOU activities, the energization process is comprised of interconnected customer and IOU activities that often occur concurrently throughout the project lifecycle. As a result, many process steps inherently combine customer and IOU dependencies, making it difficult to isolate and measure the IOU-specific portion of the timeline independent of overall project execution. Without the ability to distinctly allocate time spent by the customer versus time spent by the IOU, SDG&E cannot determine whether the IOU-specific portion of work meets or exceeds the applicable energization targets. Because these aggregated metrics rely on the accurate disaggregation of underlying data, the absence of this foundational data prevents SDG&E from generating valid average values, maximum values, or reasoning associated with apparent exceedances of the IOU energization targets. Until the necessary underlying data elements are available and consistently captured, SDG&E is unable to produce the energization timeline metrics in a manner that meets CPUC reporting requirements. In addition, the data currently available is not consistently captured or maintained at the level of detail necessary to support reliable attribution of timeline responsibility across all projects.

A. Data Availability and Data Quality

Due to the availability and maturity of certain data elements, SDG&E utilizes the terms “Not Available,” “N/A,” and “Unknown” throughout the report. “Not Available” indicates data that cannot currently be reported due to system limitations. “N/A” indicates the data element is not applicable to the specific project or work type. “Unknown” indicates the information is not yet available or cannot be determined due to pending project activities, incomplete information, or data limitations.

SDG&E prepared this report utilizing the full capabilities of its current systems, supplemented by manual data validation where feasible. While every reasonable effort has been made to provide accurate information, certain data elements remain subject to system limitations, incomplete source data, or evolving reporting methodologies. Additionally, customer-provided data is not verified for accuracy and may further impact the accuracy and reliability of the reporting. Customer-provided data fields include, for example:

- Customer Desired Energization Date
- Difference from Customer Desired Energization Date and Final Energization Date (Calendar Days)
- Difference from Customer Desired Energization Date and Final Energization Date (Business Days)
- Estimated timing for when customer anticipates additional utility capacity needs to be available as indicated on customer's application (Date)

- Size of Installed Main Panel Upgrade (Amps)

B. Cost Reporting Limitations

Certain cost components may be reported as "Unknown" because actual or estimated costs may not yet be available at the time of reporting. Following energization, SDG&E may continue to receive contractor invoices or “trailing costs” as part of the financial reconciliation process, which can extend over six months beyond the energization date. Accordingly, costs reported in this filing represent the best available information at the time of reporting and may not reflect final reconciled costs.

SDG&E will continue to report available cost data using its current systems. At this time, SDG&E’s system limitations do not allow for reliable retrieval of granular data related to costs. If additional cost data granularity is required beyond what is currently available, system enhancements may be required.

C. Eight Steps

Mapping SDG&E’s existing stage-gate processes and project milestones to the Commission’s eight-step framework, including the identification and reporting of concurrent steps, presents ongoing implementation challenges. Because SDG&E’s systems were not originally designed around the eight-step framework, certain step-level dates, durations, concurrent activities and associated calculations are limited by data availability, data quality, or system limitations. Additionally, some system data entries may be missing, which can affect reported step start and end dates, duration calculations, identification of concurrent activities, and related reporting metrics. SDG&E continues to evaluate process improvements and system enhancements to improve alignment between its operational processes and the Commission's reporting framework while reducing reliance on manual data processing.

The alignment of SDG&E’s stage-gate processes with the eight-step framework also creates challenges in communicating project status to customers.¹² Historically, SDG&E customers were able to track project status and actions needed through SDG&E-specific milestones. SDG&E continues to evaluate enhancements that will support comparable customer transparency while aligning project tracking and reporting with the Commission's statewide framework.

D. Delay Attribution and Reporting

The Commission's energization timeline requirements are based on IOU-controlled activities; however, the energization process consists of interconnected customer and utility activities that frequently occur concurrently throughout the project lifecycle. As a result, accurately identifying and measuring customer-related and IOU-related delays requires the ability to reliably distinguish and track those activities at a granular level.

Consistent with guidance received from the Commission's Energy Division, SDG&E considers an “IOU Delayed Project” to be one in which the total IOU-controlled time across the full project lifecycle exceeds the maximum energization targets established in the Decision. This definition is based on the overall project timeline rather than delays occurring within individual process steps, as delays in one phase may be offset by efficiencies in another.¹³

Similarly, a “Customer Related Delay” occurs when project progression is prevented by a customer-dependent activity and no concurrent IOU-controlled activity is occurring. Examples may include customer-requested design changes following the completion of Step 2, rescheduled inspections, or delayed responses to SDG&E requests.

To improve its ability to consistently identify and document Customer Related Delays, SDG&E has improved their process for tracking when a customer action (or inaction) prevents a project from advancing. This process helps provide a standardized mechanism for categorizing and monitoring customer-initiated delays across projects. While these enhancements have improved data availability and consistency, additional system enhancements are necessary to fully automate delay attribution and comprehensively distinguish customer-dependent and IOU-controlled time throughout the project lifecycle.

SDG&E currently faces system limitations that constrain its ability to comprehensively track and differentiate IOU-attributable and customer-driven delays across the project lifecycle. System enhancement opportunities have been identified to begin addressing these deficiencies and enable more accurate and automated tracking of delay sources. Once implemented, the enhancements will allow SDG&E to more precisely isolate customer-related time and ensure that IOU performance metrics reflect only IOU-controlled activities.

VI. CONCLUSION: DATA & REPORTING INSIGHTS

The aggregate completed application to energization timeline data provided in the aggregate summary represents the most accurate reflection of overall performance available within current system capabilities. Although customer-and IOU-controlled time cannot yet be consistently separated, the aggregate data and average energization timelines per tariff continue to provide a meaningful indicator of end-to-end project performance.

The current energization reporting framework includes all cumulative project data beginning January 31, 2023. While this approach provides a broad dataset, it does not fully reflect the operational and process improvements SDG&E has implemented following the issuance of D.24-09-020. Because the current reporting requirement structure continues to

¹³ Projects are not considered delayed due to routine or minor schedule adjustments, such as rescheduling inspections or minor internal shifts. Delays within specific steps do not qualify a project as “delayed” unless they contribute to exceeding the total IOU “maximum” time threshold. The Decision’s framework is based on overall project timing, allowing for delays in one step to be offset by acceleration in another. Due to current system constraints, SDG&E lacks the capability to systematically track IOU-controlled time throughout the full project lifecycle and effectively report on delays. Without system enhancements that support granular tracking to separate IOU and Customer dependencies, SDG&E is unable to distinguish and exclude where minor schedule changes have occurred.

incorporate long duration projects initiated prior to the Decision, overall averages can appear to increase as these older jobs reach completion. This observed trend is driven by the rolling inclusion of legacy projects rather than diminished performance.

To more accurately evaluate and demonstrate the progress made since the Decision, SDG&E developed supplemental metrics that compare pre-Decision and post-Decision project energization timelines. This comparison more clearly illustrates the impact of SDG&E’s process improvements. Early results show meaningful reductions in end-to-end project timelines for projects initiated under the new framework of the Decision, providing measurable evidence of increased efficiency within SDG&E’s energization processes. Despite these improvements, SDG&E’s current systems do not yet support the discrete separation of customer-driven time from IOU-controlled time. As a result, performance metrics used for the September 2026 reporting cycle rely on end-to-end durations from completed application to energization which inherently include customer related activities. While this limits the precision with which IOU performance can be isolated, the data still indicates a positive overall trend across the broader job population.

Additionally, Rule 16 projects due to their high volume and relatively short duration continue to have a weighting effect on aggregate averages. To help demonstrate this, SDG&E includes the following breakdown of timelines by each tariff type within this reporting period.

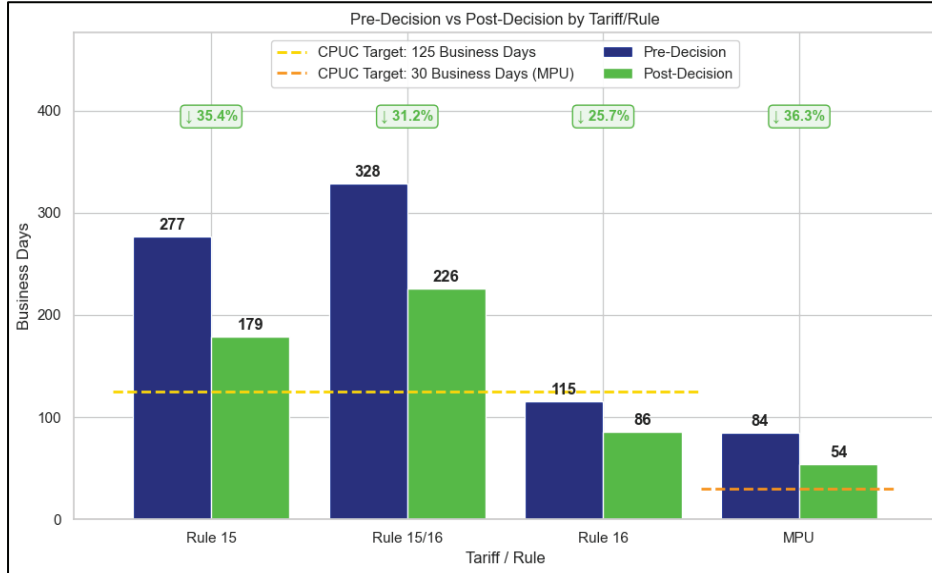
Table 3 – Average Energization Timelines Per Tariff

	Rule 15	Rule 15/16	Rule 15/45	Rule 16	Rule 45	
Average Applicant Final Submittal (“AFS”) to Energized (Business Days)	243	298	344	99	347	
Count of Completed Energization Requests	727	175	16	11306	34	12258 (total)

To further illustrate improvements in energization performance, SDG&E has developed a comparison of pre-Decision and post-Decision job timelines. This comparison provides a clearer view of trend improvements that are otherwise obscured in the cumulative reporting structure.

Comparison of Pre-Decision and Post-Decision End-to-End Timelines (Business Days)

	Average Cumulative Timeline ¹⁴	Average Timeline (Pre-Decision)	Average Timeline (Post-Decision)	Timeline Reduction (Pre-Decision vs. Post-Decision)
Rule 15	243	277	179	98
Rule 15/16	298	328	226	102
Rule 15/45	344	346	N/A	N/A
Rule 16	99	115	86	30
Rule 45	346	358	N/A	N/A
MPU	65	84	54	31



These metrics provide clearer evidence of efficiency improvements that are not visible in the cumulative reporting format. Across multiple tariff types, post-Decision timelines reflect

¹⁴ Cumulative timelines represent jobs with a completed application beginning January 31, 2023.

reductions relative to pre-Decision performance. Overall, while system limitations continue to constrain the granularity of reporting particularly in distinguishing IOU and customer time, the data demonstrates that SDG&E is achieving meaningful improvements in energization timelines and progressing toward the statewide targets established in D.24-09-020. Continued modernization of legacy systems will further enhance data accuracy, improve transparency, and support sustained improvement in customer experience and energization timelines.

SDG&E remains committed to supporting California's decarbonization goals by enabling timely customer energization requests and distribution system upgrades and on improving the overall customer journey, with greater communication and transparency. SDG&E will continue its efforts to address implementation opportunities and system limitations in furtherance of the Decision and its customers.

Staffing Analysis Attachment

San Diego Gas & Electric Company's 2026 Analysis of Current and Future Qualified Staffing Levels Pursuant to Public Utilities Code Section 935

A. Executive Summary

Pursuant to Public Utilities Code Section 935, San Diego Gas & Electric Company (SDG&E) submits this staffing analysis to provide a comprehensive evaluation of the company's workforce strategy, current staffing structure, and projected staffing resource needs as it relates to energization.¹ This analysis is intended to inform stakeholders of SDG&E's approach to aligning workforce capabilities with operational demands while maintaining compliance with applicable tariff rules and service obligations. The analysis provides a focused assessment of the staffing required to plan, design, engineer, and construct customer-driven electric distribution energization work requests, including but not limited to, those projects with jobs across Electric Rules 2,13,15, 16, 45, 46² and other requests such as Main Panel Upgrades (MPUs), coordination with Rule 21 projects and customer requested outages; or any combination to meet a customer's project needs.

Within the Electrification Distribution Workforce³ that supports customer energization requests and the 8-steps of energization as adopted in D.24-09-020,^{4, 5} SDG&E currently has 457 full-time employees (FTE) and 341 contractors inclusive of current vacancies. It should be noted that SDG&E does not have dedicated resources for energization requests so, to varying degrees, the functions and departments included in this analysis also support work beyond customer energization requests. As SDG&E currently does not track the breakout, this workforce staffing analysis includes the full staffing count of the primary functional areas that are part of the core energization process.

¹ "Energization" is defined in Public Utilities Code Section 931 as connecting customers to the electrical distribution grid and establishing adequate electrical distribution capacity or upgrading electrical distribution or transmission capacity to provide electrical service for a new customer, or to provide upgraded electrical service to an existing customer.

² SDG&E requested to establish Rule 46 via Advice Letter 4774-E, submitted December 17, 2025. This advice letter is pending disposition.

³ Electrification Distribution Workforce is defined by the staffing required to energize residential, commercial, and government customers for tariff work pursuant electric Rules 2,13,15, 16, 45, 46 and other requests such as MPUs, coordination with Rule 21 projects and customer requested outages; or any combination of such therein to meet a customer's project needs.

⁴ Decision Establishing Target Energization Time Periods and Procedure for Customers to Report Energization Delays, at Section 7.

⁵ The Electrification Distribution Workforce also supports non-customer requested work.

Projected staffing requirements balance anticipated growth in customer-driven energization requests with SDG&E's ongoing efforts to streamline and automate its manual and disaggregated processes and systems.⁶ These initiatives aim to reduce duplicate and manual tasks and leverage technology through continued IT and automation investments. To meet these demands, SDG&E has a deliberate workforce strategy focused on operational efficiencies, process improvements, and technology enablement. This approach is designed to absorb incremental workload through automation and technology solutions, minimizing headcount growth except when critical to meeting energization timelines. By doing so, resources can be reduced or shifted to more specialized roles, driving efficiency and proficiency in roles supporting customer energization projects. A cornerstone of SDG&E's workforce strategy is maintaining a robust apprenticeship pipeline for technical field roles. These positions require extended time to achieve certification and proficiency in lineman-related trades. SDG&E also has an in-depth engineering rotational program, but it is not classified as an apprenticeship. Recruiting, training, and retaining these specialized skill sets are essential to sustaining SDG&E's ability to continue delivering safe, reliable, and timely service to customers. This staffing analysis reflects SDG&E's commitment to proactive workforce planning to continue meeting customer expectations and energization timelines.

The remainder of this report is divided into the following four Sections:

1. Section B – Framework for Staffing Analysis: Provides a background and overview of Senate Bill (SB) 410 (Powering Up Californians Act) and required staffing analysis per Public Utilities Code Section 935.
2. Section C – Current Qualified Staffing Levels of the Electric Distribution Workforce: Current Electrification Distribution workforce headcounts supporting customer energization requests.
3. Section D – Apprenticeship: Highlights of SDG&E's apprenticeship and trainee programs.
4. Section E – Forecast Staffing Analysis & Conclusion: Forecasted staffing needs for SDG&E. These forecasts take process improvements and technology solutioning into consideration as part of the SDG&E staffing strategy.

B. Framework for Staffing Analysis

1. Regulatory Background

In 2023, the California Legislature enacted the Powering Up Californians Act through SB 410, establishing state policy that upgrades to electrical corporations' distribution systems are

⁶ A project lifecycle can span up to sixteen different business units across twenty disparate systems. In 2025 SDG&E began connecting these systems for visibility and transparency and is further pursuing efforts to streamline its energization work to reduce energization timelines and provide a simplified and transparent customer experience.

essential for meeting decarbonization goals, fulfilling utility obligations to serve, and ensuring that housing, businesses, and electric vehicles can be energized without delay. SB 410 was prompted by rising concern over utilities' ability to energize customer requests promptly, leading the Legislature to require that electrical corporations recruit, train, and retain a sufficiently large, qualified workforce to carry out distribution system upgrades and customer energizations while continuing vital safety and reliability activities such as wildfire mitigation, inspections, and maintenance. Importantly, the Legislature directed the California Public Utilities Commission (Commission) to mandate that utilities maintain adequate staffing and an apprentice pipeline to support these objectives. Consequently, Section 935 of the Public Utilities Code, requires utilities, as part of each general rate case and annual report, to provide an analysis of current and projected staffing levels for all roles needed to plan, engineer, and construct distribution system upgrades necessary for timely customer energization, without compromising critical ongoing safety and reliability work.

2. Approach to this Staffing Analysis

To meet the staffing analysis requirements of Public Utilities Code Section 935, SDG&E first identified every department that contributes to customer-driven energization projects across the full lifecycle—from initial customer request through planning, design, engineering, permitting, land, environmental, customer required work, inspection, and construction. Current staffing data was then collected for each functional area and reported here in Section C.

C. Current Qualified Staffing Levels of the Electrification Distribution Workforce

The Electrification Distribution Workforce is defined by the staffing required to energize residential, commercial, and government customers for tariff work pursuant electric Rules 2,13,15, 16, 45, 46 and other requests such as MPUs, coordination with Rule 21 projects and customer requested outages; or any combination of such therein to meet a customer's project needs. This includes, for example, combination jobs where more than one tariff rule applies such as Rule 15/16 and Rule 15/45. The staffing required for this workforce begins with our application intake team and concludes with the construction crews required for energization. Across the 8-step energization process, adopted in D.24-09-020, the Electrification Distribution Workforce at SDG&E is comprised primarily of the following project functions:

- Planning & Project Management (including Billing)
- Land & Environmental Services
- Design & Permitting
- Electric Distribution Planning
- Electric Engineering
- Construction Management & Field Crews

Planning & Project Management: Responsible for the customer's application for energization, planning, and project management of customer requested projects including MPUs, and Rules 2,13,15, 16, 45, and 46 projects, as well as coordination on Rule 21 and customer requested outages. Provides project accountability for customers, including a single point of contact (SPOC) pursuant to the Energization OIR Decision. Responsible for providing seamless customer service throughout the project lifecycle and coordination where multiple tariffs or other customer requests are involved. Fields and writes service orders, performs all project planning activities, prepares customer contracts, supports customer billing and interfaces with Authorities Having Jurisdiction, to ensure customer inspections have been completed prior to energization. Includes working with **Billing** to ensure required fees are accurately reviewed and paid throughout the lifecycle of a project. Ensures that the appropriate meter rate is set for the customer for long-term service. This includes setting tariff incentivized rates such as the EV-HP rate.

Land & Environmental Services: These departments are responsible for obtaining essential land rights, including easements, and ensure compliance with all environmental requirements.

Design & Permitting: Prepares distribution designs for electric distribution work orders. For energization requests this would primarily include designs for Rule 2, 13, 15,16, 45 and 46. This scope includes all necessary Field Change Orders (FCO's) as well as quality assurance and quality control (QA/QC) reviews. Secures all required permits at the local, state, federal or agency level necessary for SDG&E to energize customer facilities or to perform other customer-requested work or company work.

Electric Distribution Planning: Responsible for identifying and scoping the distribution system upgrades based on the review and analysis of customer energization requests. Responsibilities extend beyond energization and includes supporting emergency operations, integrating advanced technologies, and providing ongoing engineering support for internal and external stakeholders. The group also has resources supporting other engineering responsibilities and upstream capacity projects, which are not included in this analysis.

Electric Engineering: Responsible for maintaining and updating service standards, material standards, work methods and construction standards, and other technical support to safely and reliably energize customers. This group would also approve any customer requested deviations from these standards. In addition, responsibilities include coordination of protection settings for primary meter customers. The group also has resources supporting other engineering responsibilities and upstream capacity projects, which are not included in this analysis.

Construction Management & Field Crews: Executes pre-construction and construction activities for all tariff work. These teams work in-concert with local county and municipal inspection teams, SDG&E inspection teams, and ensure all required project prerequisites and safety verifications are completed and in compliance with SDG&E standards prior to scheduling construction crews. Assigns and manages contracted civil and electrical construction crews

appropriate to project scope, creates switch plans and schedules any required outages to perform work, and coordinates with customer contractors.

A detailed breakdown by project functional area is as follows:⁷

Project Functional Area	2026	2027	2028	2029	2030	2031
Planning & Project Management	363	363	363	363	363	363
Design & Permitting	105	105	105	105	105	105
Construction Management & Field Crews	177	184	184	184	184	184
Electric Distribution Planning	7	7	7	7	7	7
Electric Engineering	38	38	38	38	38	38
Land & Environmental Services	108	109	111	111	111	111
TOTAL	798	806	808	808	808	808

A further breakdown of these project functional areas based on Job Classification is set forth in **Attachment A – “Workforce by Job Classification”** hereto.

D. Apprenticeship

SDG&E maintains structured apprenticeship and trainee programs for linemen to ensure a sustainable pipeline of qualified personnel for critical field and engineering support roles. Program elements typically include classroom instruction, on-the-job training (OJT), progressive skill assessments, and certification milestones aligned with safety and industry standards. SDG&E does not have apprenticeship pipelines for engineers. However, selected engineers do participate in a rotational program throughout the company.

E. Forecast Staffing Analysis & Conclusion

For the remainder of SDG&E’s current General Rate Case (GRC) cycle (2026-2027), SDG&E does not currently forecast any workforce growth outside of filling any vacancies that currently exist. In preparation for growth in energization requests that will likely occur during this period or beyond, SDG&E’s strategy is to prioritize technology investments and process improvements to reduce the need for additional workforce resources and will continue to look for opportunities to create efficiencies in workflow platforms and customer portals that further enable automation, customer communication and scheduling, and AI enhancements. The automation and creation of efficiencies of manual processes will create opportunities to shift resources to more complex and skilled tasks as energization requests increase.

⁷ Includes SDG&E full time employees and contracted workforce.

SDG&E requested funding through its SB 410 Ratemaking Mechanism Application (A.25-04-015) to address the critical IT enhancements needed to meet the compliance requirements specified in D.24-09-020. Although the Commission's final decision on the application did not authorize SDG&E to utilize the mechanism to immediately recover the costs of these needed IT enhancements, SDG&E believes IT investments deliver value to all ratepayers by reducing cost of service to our customer base without growing the workforce, while also enabling faster energization timelines and more transparent communications with customers as intended by the D.24-09-020. Specifically, the SDG&E customer portal is being enhanced to strengthen communication and transparency throughout the energization process. Planned improvements include clearly identifying each customer's designated single point of contact, integrating AI-enabled capabilities to guide customers through the application process, and expanding status updates to provide more detailed, real-time visibility into project progress and requirements. In addition, SDG&E is expanding our internal process workflow platform (NEXUS) that interfaces and aligns SDG&E stakeholders across the 8-steps of energization to reduce timelines while ensuring unity of effort for every project type.

SDG&E is committed to having sufficient and adequately skilled resources to energize customers in a timely manner that meets their needs and in compliance with Public Utilities Code Section 935 without impairing ongoing safety and reliability activities such as wildfire mitigation, inspections, and maintenance. Multi-year hiring strategies will be reviewed and adjusted to reflect efficiencies, regulatory directives, and observed performance.

Attachment A - Workforce by Job Classification

Planning & Project Management						
Full Time Employees (FTE)						
Job Classification	2026	2027	2028	2029	2030	2031
Customer Engagement Manager	1	1	1	1	1	1
Planning Manager	4	4	4	4	4	4
Project Support Manager	1	1	1	1	1	1
Project Management Supervisor	13	13	13	13	13	13
Service Order Supervisor	6	6	6	6	6	6
Project Support Supervisor	3	3	3	3	3	3
Policy & Compliance	5	5	5	5	5	5
Data Analyst	3	3	3	3	3	3
New Service Representative	6	6	6	6	6	6
Planning Advisor	7	7	7	7	7	7
Project Manager	23	23	23	23	23	23
Project Planner	54	54	54	54	54	54
Project Support	32	32	32	32	32	32
Service Coordinator	10	10	10	10	10	10
Service Planner	34	34	34	34	34	34
Business Analyst	1	1	1	1	1	1
Accounting Supervisor	1	1	1	1	1	1
Senior Accountant	1	1	1	1	1	1
Total FTEs	205	205	205	205	205	205

Contractors						
Job Classification	2026	2027	2028	2029	2030	2031
Data Analyst	10	10	10	10	10	10
Financial Analyst	3	3	3	3	3	3
Document Control Specialist	14	14	14	14	14	14
Project Planner	34	34	34	34	34	34
New Service Representative	3	3	3	3	3	3
Project Coordinator	13	13	13	13	13	13
Project Manager	17	17	17	17	17	17
Project Support	40	40	40	40	40	40
Service Coordinator	3	3	3	3	3	3
Service Planner	11	11	11	11	11	11
Training Specialists	6	6	6	6	6	6
Business Analyst	1	1	1	1	1	1
Senior Accountant	1	1	1	1	1	1
Staff Accountant	2	2	2	2	2	2
Total Contractors	158	158	158	158	158	158

Design & Permitting						
Full Time Employees (FTE)						
Job Classification	2026	2027	2028	2029	2030	2031
Distribution Designer	30	30	30	30	30	30
New Business Design Supervisor	3	3	3	3	3	3
Customer Driven Design Manager	1	1	1	1	1	1
Technical Support Assistant	3	3	3	3	3	3
Design Advisor	3	3	3	3	3	3
Governance & Optimization Supervisor	1	1	1	1	1	1
Permitting Supervisor	2	2	2	2	2	2
Governance & Optimization Manager	1	1	1	1	1	1
Permit Administrator	9	9	9	9	9	9
Municipal Advisor	6	6	6	6	6	6
Project Manager	1	1	1	1	1	1
QAQC Advisor	4	4	4	4	4	4
Total FTEs	64	64	64	64	64	64

Contractors						
Job Classification	2026	2027	2028	2029	2030	2031
Design Support Coordinators	2	2	2	2	2	2
Document Control Specialist	2	2	2	2	2	2
Business Analyst	2	2	2	2	2	2
Design Techs	5	5	5	5	5	5
New Business POC	3	3	3	3	3	3
Project Coordinator	1	1	1	1	1	1
Design Advisor	2	2	2	2	2	2
TCP Specialist	12	12	12	12	12	12
Project Specialist	5	5	5	5	5	5
QAQC Technical Specialist	2	2	2	2	2	2
QAQC Construction Inspector	5	5	5	5	5	5
Total Contractors	41	41	41	41	41	41

Construction Management & Field Crews						
Full Time Employees (FTE)						
Job Classification	2026	2027	2028	2029	2030	2031
Electric Construction Manager (CM)	2	2	2	2	2	2
Civil Construction Manager (CM)	2	2	2	2	2	2
Electric Field Construction Advisor (FCA)	5	5	5	5	5	5
Civil Field Construction Advisor (FCA)	2	2	2	2	2	2
Project Manager	1	1	1	1	1	1
Construction Management Specialist	4	5	5	5	5	5
Project Advisor	1	1	1	1	1	1
Project Support Supervisor	1	1	1	1	1	1
Project Coordinator	8	11	11	11	11	11
Inspector Supervisor	2	2	2	2	2	2
Trench Desk	6	6	6	6	6	6
Inspector A	29	32	32	32	32	32
PC and Insp Manager	2	2	2	2	2	2
Construction Supervisor	9	9	9	9	9	9
Working Foreman	9	9	9	9	9	9
Lineman	27	27	27	27	27	27
Total FTEs	110	117	117	117	117	117

Contractors						
Job Classification	2026	2027	2028	2029	2030	2031
Standby Lineman Field Const. Advisor	2	2	2	2	2	2
Civil Field Construction Advisor	3	3	3	3	3	3
Project Advisor	1	1	1	1	1	1
Business Analyst	1	1	1	1	1	1
Foreman	10	10	10	10	10	10
Lineman (FPW)	30	30	30	30	30	30
Apprentice (FPW)	10	10	10	10	10	10
Project Manager (FPW)	3	3	3	3	3	3
Operations Assistant	7	7	7	7	7	7
Total Contractors	67	67	67	67	67	67

Electric Distribution Planning						
Full Time Employees (FTE)						
Job Classification	2026	2027	2028	2029	2030	2031
Planning Engineer	7	7	7	7	7	7
Total FTEs	7	7	7	7	7	7

Electric Engineering						
Full Time Employees (FTE)						
Job Classification	2026	2027	2028	2029	2030	2031
Engineer	13	13	13	13	13	13
Construction Standards Administrator	7	7	7	7	7	7
Service standard Administrators	4	4	4	4	4	4
Project Manager	2	2	2	2	2	2
Total FTEs	26	26	26	26	26	26

Contractors						
Job Classification	2026	2027	2028	2029	2030	2031
Drafter/Designers	5	5	5	5	5	5
Project Manager/Coordinator	7	7	7	7	7	7
Total Contractors	12	12	12	12	12	12

Land & Environmental						
Full Time Employees (FTE)						
Job Classification	2026	2027	2028	2029	2030	2031
ROW Agent	1	1	1	1	1	1
Land Manager	6	6	6	6	6	6
Land Survey Advisors	3	3	3	3	3	3
Facility Environmental Reps	6	6	7	7	7	7
Environmental Planners	7	7	8	8	8	8
Queue Coordinator and GIS	2	2	2	2	2	2
Cultural Resources SME	7	7	7	7	7	7
Natural Resources SME	7	7	7	7	7	7
Air and Water Resources SME	4	4	4	4	4	4
Field Operations Representative	1	1	1	1	1	1
Senior Water Quality Specialist	1	1	1	1	1	1
Total FTEs	45	45	47	47	47	47
Contractors						
Job Classification	2026	2027	2028	2029	2030	2031
ROW Agent	5	5	5	5	5	5
ROW Assts	5	5	5	5	5	5
Land Manager Assts	3	3	3	3	3	3
Rights Researchers	5	6	6	6	6	6
Land Surveyors	5	5	5	5	5	5
Natural Resources SME	20	20	20	20	20	20
Cultural Resources SME	11	11	11	11	11	11
Water Resources SME	2	2	2	2	2	2
Queue Coordinator	2	2	2	2	2	2
GIS Specialist	1	1	1	1	1	1
Support for Tribal Projects w/ BIA	4	4	4	4	4	4
Total Contractors	63	64	64	64	64	64

ATTACHMENT B

SDG&E BIENNIAL 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>