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

Roger A. Cerda
8330 Century Park Court, CP32D
San Diego, CA 92123-1530
Telephone: (858) 654-1781
Email: rcerda@sdge.com

Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY

September 30, 2025

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

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, 2025 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

Roger A. Cerda
8330 Century Park Court, CP32D
San Diego, CA 92123-1530
Telephone: (858) 654-1781
Email: rcerda@sdge.com

Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY

September 30, 2025

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, 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 (Decision), San Diego Gas & Electric (SDG&E) hereby submits this Energization Target Data and Reporting Narrative.

This report is intended to support 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."[1] 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. In the absence of an approved funding mechanism, these improvements have been made within the bounds of existing available 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 are essential. These improvements come at significant incremental cost and cannot be fully realized without dedicated funding support.

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 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, and was made effective immediately. D.24-09-020 clarifies that the intention of establishing the average and maximum energization

[1] Pg 59 of CPUC Decision 24-09-020

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. D. 24-09-020 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 the customer experience, to accelerate energization project timelines, and to systematically track and report on each of the new requirements mandated by D.24-09-020.

SDG&E has parallel initiatives in flight that are aimed at improving customer experience and system technology utilized by the numerous internal teams that work on energization projects across multiple disparate systems. SDG&E held listening sessions with over 75 external stakeholders representative of builders, contractors, affordable housing developers, and others engaged with our energization process, and gathered survey responses from over 450 regional stakeholders who recently completed energization projects. This feedback identified common pain points across the project lifecycle. These insights were used to develop an actionable plan aligned with the Decision's compliance requirements, and require technology improvements across the multiple internal teams, systems, and manual processes utilized today to energize projects. Primary improvements include implementation of single point of contact, and reduction of manual steps and handoffs, to improve intake, timelines, communication, portal usability, and coordination to advance faster energization timelines and more proactive communication as required by the Decision.

While 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 goal to support timely energization in a transparent and customer-centric manner, the ability to fully meet the requirements outlined in the Decision remains uncertain as it requires investment in technology. The outcome of this request is currently pending in SDG&E's SB 410 application.

III. OBSTACLES, TRENDING INFORMATION AND REPORT FINDINGS

A. Obstacles

1. Aligning The Eight Energization Steps

SDG&E has traditionally employed a project management framework known as "Stage Gates." This approach has been effective in providing structured oversight and governance for general project execution, particularly in managing schedules, resources, and deliverables, as well as communicating key milestones with the customer. However, this framework historically did not include specificity in delineating all the customer and IOU distinct roles and responsibilities that occur within the project lifecycle. Additionally, it does not fully align with

the eight-step energization process, which outlines a comprehensive sequence of activities required to bring a customer's energization project to completion.

Energization projects typically involve a range of interdependent activities such as engineering design, permitting, construction, inspections, and energization. These activities are rarely executed in isolation or in a fixed order. Instead, they often occur simultaneously or in overlapping phases to optimize project timelines and reduce delays. For example, SDG&E may be actively securing permits at the same time the customer is performing trenching work to fulfill the requirements of the "customer site readiness" step. This overlap of utility and customer activity, while often necessary to accelerate project timelines, creates challenges in tracking and reporting at a granular level. The concurrent nature of these tasks makes it difficult to clearly measure progress within a linear or phase-based reporting framework. While SDG&E is working towards aligning its current process to the eight energization steps, system limitations that constrain its ability to comprehensively track and differentiate IOU-attributable and customer related time throughout the energization timelines remain an obstacle.

Absent significant and costly system enhancements, mapping SDG&E's existing processes to each of the eight steps set forth in the Decision , challenges still exist that may yield inconsistencies and unreliable data elements at the individual step level. As a result, when adding and averaging the sum of the total calendar/business days of each of the eight statewide steps, the resulting average does not accurately reflect SDG&E's overall energization timelines. This is further explained below.

Although SDG&E's existing system and processes do not currently align completely with the steps in the Decision, SDG&E has been and will continue to be transparent with the CPUC and customers and is actively working on enhancing communications, timelines, tracking, and reporting as much as possible within the confines of budgetary limitations for this incremental work.

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

While SDG&E remains committed to implementing these requirements, it is important to acknowledge that these activities were not previously scoped or funded within current GRC

authorized budgets. As such, SDG&E has sought incremental funding to fully meet the Decision's requirements.[2]

In the absence of significant system enhancements, SDG&E continues to recommend that the Commission consider that the best representation of SDG&E's overall energization timelines for this reporting period is the time between the Applicant Final Submittal (AFS) or "completed application" and the load energization date, as discussed in SDG&E's March Energization report. When compared to the eight statewide steps for reporting, SDG&E believes that the calendar/business days between the completed application and energization date most accurately reflect the energization project timeline based on the most accurate data available.

B. Trending Information and Overall Report Findings

1. Intake Process Enhancements

As part of SDG&E's broader strategy to enhance the customer intake experience and align with future-state automation and self-service capabilities, several initiatives are currently underway to streamline intake operations and improve customer experience.

After conducting a comprehensive assessment, SDG&E has identified opportunities to redesign the customer application process within the Builder Service Portal (BSP) to provide a guided, step-by-step experience that will align with the CPUC's requirements in D. 24-09-020. This enhancement is intended to reduce errors, improve submission completeness, and support faster processing by clearly directing customers through each required input. In parallel, SDG&E has identified opportunities to refine the intake process to ensure we collect the necessary information upfront and educate customers on how to enter information properly, enabling accurate routing to the appropriate planning teams. Implementation work on this initiative began in September 2025, with completion targeted for Q1 2026.

Additionally, SDG&E is exploring an automated AI-powered Intake Coordinator Agent, pending available resources. This agent would be designed to assist with basic intake processing tasks, such as validating initial inputs and routing applications appropriately, thereby reducing manual workload and improving intake efficiency.

To support system and process enhancements, SDG&E is evaluating opportunities to improve efficiency through a more standardized intake process. This includes reviewing current workflows to identify inconsistencies and streamline how customer applications are received and processed. By establishing a consistent intake framework, SDG&E aims to reduce errors, improve processing speed, and create a more scalable and responsive experience for customers.

2. Reporting Parameters

SDG&E is reporting on Customer-driven Rule 15, 16, 15/16, 45, 15/45, and MPU jobs with a completed application between January 31, 2023, through June 30, 2025. The data set

[2] A.25-04-015

includes jobs initiated prior to the timeline compliance requirements. The data set excludes Rule 15, Rule 16, and Rule 15/16 jobs that are driven solely by SDG&E business operations as well as Rule 16 jobs that are triggered by a Rule 20 project. SDG&E's source data was retrieved on July 1, 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. 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 noted, SDG&E's existing systems do not fully 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, 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. 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, if a meter is required for the job.
- For Rule 15/16 combination jobs, Step 8 concludes at the first meter set date.
- 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, 2025. However, many of the jobs included in the data set are not required to meet the energization targets adopted by the Decision, as the completed application dates pre-date the Decision's effective date of September 17, 2024 and do not fall under the compliance requirements.

3. 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 service inquiry. As this date is customer-supplied, it is often aspirational and may not reflect the practical constraints or requirements associated with 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 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.

4. Customer Requested Load

SDG&E's data collection for customer requested load estimates is primarily driven by inputs submitted through the BSP during the initial service inquiry. Customers are prompted to provide estimated electrical load based on the type of service requested. To support accurate submissions, SDG&E offers reference guidance by listing common equipment types, such as tankless water heaters, electric vehicles (EVs), solar, elevators, and air conditioning units, along with their typical load values. Customers may also manually input the estimated load in kW. However, 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 side data further complicates efforts to report actual site capacity. These limitations directly affect the data quality 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.

---

[3] 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.

[4] 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.

5. 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" (Not Applicable). Lastly, the available data may not tell the full story: Permitting deliverables and approval requirements can be impactful to timely Energization.

IV. SUPPLEMENTAL REPORTING REQUIREMENTS

A. 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 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, the CPUC Section 851 approval process involves multiple steps and may extend up to 120 days. Municipal moratoriums may also temporarily suspend 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 preliminary design efforts, customers may put projects on hold due to funding. These projects could remain on hold for an extended period of time 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, such as 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 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 objective of improving the customer experience, reducing energization timelines, and meeting expanded tracking and reporting requirements, SDG&E is actively

evaluating ways to optimize existing resources and enhancing its operational capabilities to best support the increase in new business demand.

Navigating these challenges requires careful planning, coordination, and flexibility to adapt to the various obstacles that arise during infrastructure deployment, all of which are considerations as SDG&E is updating its energization process.

B. Timeline Data Reporting

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 continues actively working to modify its practices to align with the Commission's definitions is the application of the term "rejected" and "cancelled" job applications. SDG&E has successfully enabled a process wherein if a job was created but lacks an AFS, it indicates that the customer was unable to provide all the necessary information to proceed with their energization request and is now characterized as "rejected." In implementing the use of this definition, SDG&E is committed to educating customers about the scenarios that can result in an application rejection. Currently, the reasons for these rejections must be manually populated by SDG&E for reporting.

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 support solutioning ways to close data gaps. In the case of easements and permitting, it has required close partnership with the municipalities to better understand their processes.

As of the current reporting period, all data gaps have been identified, and SDG&E is implementing solutions where quick fixes are available. Simultaneously, SDG&E is identifying where more complex solutions are needed.[5] 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 exceed energization timeline targets are currently limited by SDG&E's existing 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, 2025). However, SDG&E emphasizes that the majority of the jobs predate the compliance requirement date of September 17th, 2024, to meet these targets. Furthermore, due to system limitations, SDG&E is currently unable to provide a narrative for each job that exceeds the average or maximum energization

[5] Implementation contingent upon receiving the funding requested in *SDG&E's Application for Authority to Establish a Ratemaking Mechanism for Energization Projects Pursuant to SB 410* (A.25-04-015).

target. Providing this data would require an overly burdensome undertaking, consisting of the manual verification of thousands of jobs. At a high level, common contributing factors include, but are not limited to, meter set requirements not being met, pre-construction inspection failures, and address changes mid-project. 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 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 demographics identified through Access and Functional Needs. SDG&E has made significant strides in rolling out programs that support customers and contractors within ESJ categories and reduce barriers to energization. When reviewing the average energization timelines for jobs within all ESJ community types, the data suggests similar energization timelines as Non-ESJ Communities.

Table 1[6]

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	4677	105	2223	75
Non-ESJ Community	2591	107	1676	73

1. Tribal Outreach

One of the ESJ communities that can face barriers to timely energization is Tribal Nations. Some of the 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 that SDG&E serves which introduces additional layers of review and approval and complexity to jobs on reservations. For example, projects can face land and permitting challenges that are unique to reservation land. 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 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. Through this, SDG&E has developed an understanding of how to best support customers 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.

[6] Table includes energized jobs only, and excludes outliers as defined in Section E "Outlier Data"

2. Customer Outreach

In 2025, SDG&E has held listening sessions with over 75 customers to better understand their experiences and identify opportunities for improvement. Six targeted sessions were conducted with Affordable Housing Developers to specifically explore pain points in the energization process. These sessions have informed actionable changes, and SDG&E has implemented a continuous feedback loop to keep participants updated on progress and ensure their input continues to shape enhancements to the customer experience. The summary below outlines the progress made to address several pain points or issues raised during the listening sessions.

Customers previously struggled with knowing how to start a project and what information was needed. SDG&E simplified the intake process by revamping the Builder's Homepage, adding educational materials, and creating a checklist to guide submissions. A dedicated intake team now ensures consistency and accuracy, helping reduce delays in planner assignments.

Project timelines were unclear and often felt unnecessarily long. SDG&E has assigned representatives to serve as the Single Point of Contact (SPOC) for a pilot segment of customers to provide guidance throughout the life of the project, identify bottlenecks, and improve handoffs. Customers are proactively notified of delays to help manage schedules and budgets.

Customers lacked visibility into project status and struggled with navigating the portal. SDG&E conducted a comprehensive assessment of the Builder's Service Portal (BSP) and has plans for enhancements that will offer real-time updates, improved usability, and centralized access to project documents.

Coordination across SDG&E teams was inconsistent, especially during staff transitions. SDG&E improved internal collaboration, standardized documentation, and developed a QA/QC checklist to catch design errors early. These efforts are supported by the newly established Customer Connections Team, a redesigned Builder's Homepage, and process transparency through clearly defined project steps and responsibilities.

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 and will need system enhancements to further these efforts and to provide the highest level of 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, the following outlier data has been removed from the Aggregate tab of the report when applicable:

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.

F. Staffing Analysis

SDG&E is actively performing a staffing analysis to support the implementation of the requirements outlined in the Decision. Since the Decision’s issuance, SDG&E has undertaken a systematic review and refinement of its organizational structure to efficiently meet the Decision requirements. As part of this effort, a new Customer Connections Team was established earlier this year to enhance the customer experience and fulfill customer communication requirements of the Decision. Currently, SDG&E is performing a detailed assessment of its organizational structure and developing a transition plan to implement a reorganization that will redefine roles, responsibilities, and operational workflows to align with the SPOC requirements. SDG&E will continue to assess the staffing needs and will supplement this report by the end of the year to include a staffing analysis pursuant to California Public Utilities Code Section 935(a). SDG&E will also submit a staffing analysis in its next GRC (filed in May 2026), as required by California Public Utilities Code Section 935(a).

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 data required by the Decision. Currently, certain data fields in the workbook are unavailable, limited, and/or unreliable. System enhancements will be necessary to fully and efficiently resolve this, and SDG&E has identified IT systems that can address data gaps and data accuracy. As this data is an incremental requirement, SDG&E did not have existing funds authorized in its last GRC to make the system enhancements necessary to provide this data. Until sufficient funds are authorized 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 its current limitations.

SDG&E anticipates data availability and accuracy to increase, but there are several steps needed for that to occur and be visible in reporting. Sufficient authorized funding will be needed. Then, 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.

SDG&E has proposed IT Enhancements[7] that are 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 are contingent upon receiving authorization of the funding requested in SDG&E's SB 410 Ratemaking Mechanism Application (A.25-04-015). Without adequate funding, implementation of these enhancements will likely be delayed. Additionally, the estimated implementation timelines 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.

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 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, it may take well over a year following the implementation of the corresponding IT system enhancement before such scenarios are reflected in the data or to know with confidence, based on reliable data, that no such scenario has occurred.

Table 2 – Estimated IT System Enhancement Implementation[8]

Data Point	Data Sheet	Est. Project Duration
Estimated timing for when customer anticipates additional capacity necessary as indicated on	Tariff Data	12 months

[7] *See* A.25-04-015 *SDG&E's Application for Authority to Establish a Ratemaking Mechanism for Energization Projects Pursuant to SB 410*.

[8] Some data points are currently reported manually or through legacy systems.

customer's application (Date)		
Total additional kW capacity for the necessary future upgrade as listed on customer's application (kW)	Tariff Data	12 months
Date of IOU rejection of application (Date)	Tariff Data	6 months
IOU reason for rejection of application (Reason)	Tariff Data	6 months
Project triggered for upstream capacity project (Yes/No)	Tariff Data	12 months
Date IOU completes the upstream capacity project (Date)	Tariff Data	12 months
Time to complete upstream capacity project (Calendar Days)	Tariff Data	12 months
Identify when in the energization process the customer requested a change in design or scope (Date)	Tariff Data	12 months
Customer cancelled/delayed project (as needed) (Yes or No)	Tariff Data	12 months
Step 3 - Data Point Start 3) Customer Dependencies Start (Date)	Tariff Data	12 months
Step 3 - Data Point End 4) Customer Dependencies End (Date)	Tariff Data	12 months
Step 4 - Data Point Start 4) Utility Dependencies' Start (Date)	Tariff Data	12 months
Step 4 - Data Point End 5) Utility Dependencies End (Date)	Tariff Data	12 months
Location of project exceeding the maximum energization target: Location (circuit level)	Tariff Data	12 months
R15/R16/R29/R45 Energization Average meeting/exceeding Average Energization Target (Meeting/Exceeding)	Tariff Data	12 months
R15/R16/R29/R45 Energization Maximum meeting/exceeding Maximum Energization Target (Meeting/Exceeding)	Tariff Data	12 months

R15/R16/R29/R45 Energization Reasoning as to why exceeded average/maximum Energization Target (Reasoning)	Tariff Data	12 months
Amount of load (kW) provided to applicant using flexible service options (kW)	Tariff Data	12 months
At the time energization provided, remaining (or total) unserved load requested by the applicant (kW)	Tariff Data	12 months
Estimate when full service will be provided to the applicant for customers using flexible service and/or receiving tiered load schedules (Date)	Tariff Data	12 months
Size of Installed Main Panel Upgrade (Amps)	MPU Data	12 months
Reason why upgrade was cancelled and/or rescheduled (Reason)	MPU Data	12 months
Main Panel Upgrade - Rescheduled Date (as needed) (Date)	MPU Data	12 months
Additional Time from Initial Scheduled Date to Rescheduled Date (Calendar Days)	MPU Data	12 months
Additional Time from Initial Scheduled Date to Rescheduled Date (Business Days)	MPU Data	12 months

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

SDG&E has prepared this report utilizing the full capabilities of its current systems, supplemented by manual data validation where feasible. Despite these efforts, several data points may be unreliable due to inherent system constraints and limitations in data availability. 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

There are several cost reporting columns in SDG&E's template with fields marked as unknown. This is because even at the time of energization, many actual or estimated costs have yet to occur or to be calculated; therefore, they remain unknown. After a job is energized, SDG&E may continue to receive contractor invoices or "trailing costs" after the energized date for reporting. As a result, the full costing process, or financial reconciliation process, can take over 6 months from the time of Energization and the data is not yet known for reporting. For this reason, there is a significant amount of unknown data under the costing components section of the report. SDG&E provides the "actual costs at the time of energization" where known/available, but it is not a final static cost, as trailing invoices can be received up to six months later. In addition, depending on the type of work and the associated billing code, no cost report is generated to calculate estimated values. For these reasons, this data may be unavailable/unknown at the time of the report.

As of the September 2025 Biannual Energization report, SDG&E systems can pull and report on all available cost data as required in the template. However, through ongoing discussions and clarifications from the CPUC, if additional cost data granularity is required, system enhancements would likely be required. At this time, SDG&E's system limitations do not allow for reliable retrieval of granular data related to costs. To provide an example, 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 as well as benefits. If further cost granularity is required than what is provided in the report, enhancements will be necessary.

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.

In addition to challenges with accurate tracking and reporting, the challenges associated with aligning stage gate data to eight statewide steps make it difficult to communicate the

customer's status to the customer. For example, system enhancements are needed to align the Customer "ball in court data" with the eight steps. Historically, SDG&E customers were able to view their stage gate status and actions needed, and SDG&E is actively working to continue to provide this level of transparency with the eight statewide steps.

4. Delays

Per recent collaboration and direction received from the Commission's Energy Division staff, SDG&E will begin utilizing the following definitions for "IOU Delayed Project" and "Customer Related Delays":

An IOU Delayed Project is defined as any project where the total IOU-controlled time across the full project lifecycle exceeds the maximum energization targets established in the Decision. This definition emphasizes a holistic, end-to-end view of project timing rather than focusing on delays at individual process steps. 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. Only time periods under IOU control are considered when determining delay status, ensuring accountability is appropriately assigned. 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.

A Customer Related Delay occurs when an energization project cannot proceed due to a customer-related dependency. This includes situations where there is no concurrent utility activity. Customer-driven delays may occur under various circumstances, including requests for design changes following the completion of Step 2, rescheduling of inspections, or failure to respond to IOU communications. In certain instances where customer delays materially affect project progression, the IOU-clock may be reset to reflect a revised AFS/starting point, consistent with the Decision's treatment of energization timeline tracking. During this reporting period, SDG&E identified 1,443 jobs that experienced a customer-related delay.

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, these enhancements will allow SDG&E to more precisely isolate customer-related time and ensure that IOU performance metrics reflect only IOU -controlled activities. Despite their critical importance, the development and deployment of these system enhancements remain at risk due to the lack of secured funding.

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 completed application dates and multiple design dates, the assumption is that the customer changed scope, including their design, but that is not guaranteed without manually 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

The aggregate completed application to energization timeline data provided in the aggregate summary represents the most accurate reflection of current performance available under existing system capabilities. Although customer-related time is not yet separately tracked, the aggregate data and average energization timelines per tariff remain a meaningful benchmark for evaluating overall performance.

A comparative analysis of end-to-end completed application to energization cycle times indicates an overall acceleration in project delivery relative to the March 2025 Biannual Energization Report. While SDG&E's current systems do not yet support the discrete separation of customer-related time from total job duration, the available data indicates a positive trend in reduced timelines across the broader job population. These preliminary improvements suggest progress toward meeting the statewide energization targets established in D.24-09-020, though further refinement in data tracking will be necessary to isolate and quantify the impact of customer dependencies. Additionally, due to the high volume of Rule 16 projects relative to other project types, their inclusion skews the aggregate average energization timeline data. To demonstrate the weighted impact that Rule 16 projects have had on SDG&E's aggregate energization timelines, the following table provides a breakdown of average timelines associated with each tariff type for the subject 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)	230	270	324	97	362	
Count of Completed Energization Requests	352	72	7	6820	17	7268 (total)

It should also be noted that the September 2025 Biannual reporting window is still heavily comprised of shorter duration Rule 16 and MPU projects. As a result, once the longer duration Rule 15 projects are increasingly reported with associated energization dates, future reports may reflect longer average and maximum durations before eventually trending back downward. Furthermore, the September 2025 Energization Biannual Report includes projects that began prior to the Decision and only reflects nine months of data following the issuance of the Decision. Many projects that submitted a complete application under the new framework have not yet reached energization and therefore have not contributed to the average timelines. As such, the current dataset should not be interpreted as a comprehensive measure of overall performance. Future reporting cycles will provide a more complete view as longer-duration projects reach energization and more robust data becomes available.

Despite the challenges posed by increased data collection and reporting requirements, SDG&E has made strides in enhancing customer experience and accelerating energization timelines within its existing resource and system constraints. Further progress, particularly in modernizing and automating legacy systems, will require additional funding to meet all requirements of the Decision. 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.

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