Company: Southern California Gas Company (U 904 G) /San Diego Gas & Electric Company (U 902 M)
Proceeding: 2024 General Rate Case
Application: A.22-05-015/-016 (cons.)
Exhibit: SCG-203-E/SDG&E-203-E

REBUTTAL TESTIMONY

OF GREGORY S. FLORES AND R. SCOTT PEARSON

(RAMP TO GRC INTEGRATION AND POST-TEST YEAR RISK SPEND EFFICIENCY CALCULATIONS)

ERRATA

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

June 2023

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I. INTRODUCTION

This rebuttal testimony regarding Southern California Gas Company's (SoCalGas) and San Diego Gas & Electric Company's (SDG&E, and, collectively, the Companies) RAMP to GRC Integration and Post-Test Year Risk Spend Efficiency Calculations addresses the following testimony from other parties:

- The Utility Reform Network (TURN), as submitted by Eric Borden and Courtney Lane (Exhibit TURN-4), dated March 27, 2023.

As a preliminary matter, the absence of a response to any particular issue in this rebuttal testimony does not imply or constitute agreement by the Companies with the proposal or contention made by this or other parties.

In its testimony, TURN asserts that Risk Spend Efficiencies (RSEs) are intended for "measuring and comparing the cost effectiveness of [the Companies'] programs proposed in this case,"[1]. As discussed below, while RSE calculations are informative for comparing the relative benefits of various proposed utility safety and reliability investments for prioritization purposes, RSE calculations were never intended to be deterministic, as TURN appears to use them in recommending disallowances for certain SDG&E and SoCalGas projects, and are not fit for that purpose.

TURN also uses the RSE calculations to calculate and present derivative Benefit Cost Ratios (B-C Ratio) and states they should be used to evaluate cost effectiveness.[2] TURN's derivative B-C Ratio calculations are not sound, have not been reviewed or adopted by the California Public Utilities Commission (CPUC or Commission) in the proceeding dedicated to adoption of methodologies to evaluate risk in the State's utilities' general rate cases, and do not serve the public interest. Adoption of TURN's positions would erode the ability of SoCalGas

[1] Ex. TURN-04 (Prepared Testimony of Eric Borden & Courtney Lane on behalf of TURN) at 4.

[2] *Id.* at 26-28 (TURN's calculation is without accounting for undecided Cost Benefit Framework (CBF) items, such as tail risk, risk tolerance, and risk attitude).

and SDG&E to keep customers, communities, and workers safe. An issue of such statewide importance should be carefully evaluated and decided in a Commission rulemaking, where the interests of all impacted stakeholders can be effectively and efficiently considered, not in a utility-specific ratemaking proceeding. Indeed, as discussed below, the Commission has an open rulemaking (R.20-07-013, the Risk OIR) to consider such alternative approaches.[3]

SoCalGas and SDG&E further discuss TURN's proposals below and why they should not be accepted.

A. Summary of TURN's Argument

The following is a summary of TURN's positions on the Companies' RSE Methodology:[4]

- States that Risk Spend Efficiencies (RSEs) allow comparison of the costs and benefits of the Companies' proposed safety investments, and that such comparisons have value in "informing the Commission's funding decisions."[5] Calculates and presents its own B-C Ratios and argues they should be used to evaluate absolute cost effectiveness and, in turn, to assess funding decisions.
- Argues that (i) RSEs should be compared to a Program Administrator Cost Test (PACT) and that RSEs "include all benefits and costs that affect the operation of the utility system"; (ii) that the same discount rate must be applied to the numerator and denominator in RSE calculations; and (iii) that RSEs are "similar" to a PACT in terms of "identif[ying] the extent to which utility investments will provide reduced or increased costs to ratepayers."[6]

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[3] *See* R.20-07-013, Order Instituting Rulemaking to Further Develop a Risk Based Decision-Making Framework for Electric and Gas Utilities, at 2 (The Commission initiated R.20-07-013 to build on requirements for a utility risk framework adopted in the first Safety Model Assessment Proceeding (S-MAP), Application 15-05-002, et al., and in R.13-11-006, the Risk-Based Decision-Making proceeding).

[4] Ex. TURN-04 (Eric Borden & Courtney Lane).

[5] *Id.* at 5.

[6] *Id.* at 19.

- States that there is insufficient granularity of tranches in specific risk calculations.[7]
- Claims that 2021 (Base Year) dollars were used for RSE calculations.[8]

II. GENERAL REBUTTAL

The Companies presented in direct testimony a robust discussion of their RAMP to GRC Integration, noting many improvements and lessons learned from the 2021 Risk Assessment Mitigation Phase (RAMP) to the Test Year (TY) 2024 General Rate Case (GRC) and discussing how the Companies have satisfied the requirements of the Risk Decision Framework (RDF) as set forth in the Settlement Agreement (SA).[9] To integrate the RAMP process into this GRC, SoCalGas and SDG&E translated the risk mitigations and Cross Functional Factors (CFF) initiatives, updated the activities as applicable, performed quantitative analysis, and addressed and incorporated feedback from intervenors and the Commission's Safety Policy Division (SPD).[10]

Indeed, the Companies' RAMP to GRC Integration process is essentially unchallenged. Instead, TURN makes a set of policymaking arguments with respect to the Companies' risk evaluation process and calculation of RSEs. Specifically, TURN states that an RSE can be converted to a Benefit Cost Ratio that has meaning, which, TURN states, should be a "single point" determinant of the cost effectiveness of a mitigation. TURN's argument is incorrect. As discussed below, RSEs do not allow for comparison of costs and benefits, but rather, are merely a factor to be considered in deciding whether to proceed with a particular safety or reliability investment.[11] The Commission has stressed that RSEs can be useful, but their limitations must

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7 *Id.*, Appendix F, at 3.

8 *Id.* at 13.

9 D.18-12-014, Phase Two Decision Adopting Safety Model Assessment Proceeding (S-MAP) Settlement Agreement With Modification; *Id.*, Appendix A, Settlement Agreement among Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, San Diego Gas & Electric Company, The Utility Reform Network, Energy Producer and Users Coalition, Indicated Shippers and the Office of Ratepayer Advocates (hereinafter, Settlement Agreement).

10 Ex. SCG-03, Ch.1 (Direct Testimony of Deana M. Ng) and Ex. SDG&E-03-2R, Ch. 2 (Second Revised Direct Testimony of Gregory S. Flores and R. Scott Pearson).

11 I.17-11-003, CPUC, *Risk and Safety Aspects of Risk Assessment and Mitigation Phase Report of Pacific Gas & Electric Company*, March 30, 2018, at 35 (In its review of PG&E's RSE methodology,

be recognized.[12] Moreover, the Commission has stated that there are numerous other qualitative and quantitative factors that must be taken into consideration to make an evaluation on whether to proceed with a particular safety or reliability investment.[13] As such, even if an RSE could be converted to a Benefit Cost Ratio, such conversion would have the same limitations as the RSE. Like the RSE from which it came, it would still be one data point and would still require consideration of other qualitative and quantitative data points to evaluate whether to proceed with a particular investment.

Perhaps even more importantly, TURN's argument here is outside the scope of the current risk evaluation framework and this GRC. The Companies' risk evaluation framework, including the calculation of RSEs, was approved by the Commission in the Safety Model Assessment Proceeding (S-MAP).[14] The Commission's December 2022 decision to modify the Risk-Based Decision-Making Framework outlines a timeline for the Companies to transition to a Benefit Cost Ratio (BCR) framework and adjust other risk methodologies, specifically when they submit their respective RAMP filings in 2025.[15] Moreover, the BCR framework remains a work in progress, with many key elements left to be resolved through the ongoing Risk OIR Phase III proceeding.[16] Given the ongoing Risk OIR Phase III proceeding and the continued adjustment and consideration of the BCR framework, it is inappropriate for TURN to propose an alternative risk evaluation methodology here. Recommended improvements to the risk decision

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The CPUC Safety and Enforcement Division (SED) agreed that RSE were not the only factor for consideration in selecting mitigations.).

[12] D.16-08-018, Interim Decision Directing Utilities to Take Steps Toward a More Uniform Risk Management Framework, at 35-36 (discussing requirements in D.14-12-025).

[13] D.22-12-027, Phase II Decision Adoption Modification to the Risk-Based Decision Making Framework Adopted in Decision 18-12-014 and Direction Environmental and Social Justice Pilots, at 24-25 (In their discussion of refining the RDF, SED maintains language from the original Settlement Agreement that upholds the limitations of RSEs and CBRs and notes their lack of being a singular decision making point.).

[14] D.18-12-014; *Id.*, Appendix A, Settlement Agreement.

[15] D.22-12-027, Appendix B, Risk-Based Decision-Making Framework Regarding Required Elements for Risk and Mitigation Analysis in the Risk Assessment Mitigation Phase (RAMP) and General Rate Case (GRC) Applications.

[16] R.20-07-013, Assigned Commissioner And Assigned Administrative Law Judges' Ruling Issuing Phase III Roadmap For Comment And Scheduling Prehearing Conference, March 13, 2023, Attachment A, Safety Policy Division Proposed Phase III Roadmap.

making process are being addressed in the ongoing Risk OIR to allow for broad stakeholder input.

TURN also suggests that 2021 dollars and not 2024 dollars are being used by SoCalGas and SDG&E for RSEs and Risk Reduction calculations.[17] This is incorrect. As discussed in the Companies' direct testimony,[18] the Companies used known and measurable dollars in 2021 to escalate costs to 2024 for O&M (which is the most appropriate way of forecasting expected increases in dollars in the future) and used an averaging method which includes an escalation factor for Capital to arrive at Capital dollars to 2024.

The Companies offer further responses to specific arguments below. However, SoCalGas and SDG&E reiterate that the ongoing Risk OIR is the proper venue to determine changes to the Risk Decision Framework, not their respective GRCs.

III. REBUTTAL TO PARTIES' PROPOSALS

A. RSEs Are but One Factor in the Risk Decision Framework and TURN's Proposals Run Counter to Established Commission Policy

TURN states that its "B-C ratios provide a stand-alone indication of cost effectiveness" for the Commission.[19] TURN further states that "RSEs can be converted to B-C ratios which show whether the value of expected risk reduction benefits exceed the expected costs."[20] However, RSEs cannot be simply converted to BCRs, as evidenced by the Commission's decision to have utilities transition to the use of BCRs prospectively, not retroactively.[21] As TURN acknowledges: "Utilities are required to use this new methodology in the next round of RAMP and GRC proceedings, beginning with the RAMP that PG&E will submit in 2024. In the meantime, the MAVF approach adopted in the D.18-12-014 Settlement continues to apply to this GRC."[22] Notwithstanding this acknowledgement, TURN creates and applies its own B-C ratios, which should not be accepted.

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[17] Ex. TURN-04 (Eric Borden & Courtney Lane) at 10.

[18] Ex. SCG-03, Ch.1 (Direct Testimony of Deana M. Ng) and Ex. SDG&E-03-2R, Ch. 2 (Second Revised Direct Testimony of Gregory S. Flores and R. Scott Pearson).

[19] Ex. TURN-04 (Eric Borden & Courtney Lane) at 32; see also *Id.* at 26-27.

[20] *Id.* at 26.

[21] *Id.* at 27 (citing to D.22-12-017 at 11, 63, Ordering Paragraph 2).

[22] *Id*.

The Commission, in its decisions, consistently refers to RSEs as being used for informing the relative prioritization of investments within a risk area or "chapter" (which the Companies have done within their respective RAMP filings). Commission precedent has established that RSE calculations help inform decision-making, but are not the singular basis for determining whether to authorize cost recovery in a GRC.[23] Nowhere has the Commission stated that a BCR of greater than 1—or any other indicator derived from RSE calculations—should be the determining factor for funding safety and reliability investments by the utilities.

Further, RSE calculations rely substantially on subject matter expert assumptions and estimates, rather than empirical data. As such, RSEs are an inexact proxy for the relative value of risk-reducing investments and fall short of being reliable for purposes of establishing an absolute threshold for justifying mitigation investments. This is particularly true where the inputs are not supported by sufficient empirical data – for example, in the case of high consequence events that occur infrequently. As such, transforming RSEs into a different mathematical expression, as TURN has done with its B-C Ratio, does not purge those B-C Ratios of the RSE's shortcomings – the same underlying issues remain.

TURN's proposals run contrary to the Commission's recognition of the limitations of RSEs and would erode the ability of SoCalGas and SDG&E to keep customers, communities, and workers safe. Further, TURN's approach of utilizing B-C Ratios as deterministic for funding decisions, could place unnecessary safety risk on the Companies and the public, as well as undermine the ability of the Companies to comply with State and Federal safety and reliability regulations.[24]

B. RSEs Do Not Allow for Absolute Comparison of Costs and Benefits

TURN characterizes the Companies' RSEs as measures of cost-effectiveness in order to ascribe deterministic value to RSEs and justify derivation of its B-C Ratios from those RSEs. For example, TURN states that RSEs are intended for "measuring and comparing the cost effectiveness of [the Companies'] programs proposed in this case,"[25] and that "RSE analysis

[23] D.22-12-027 at 24-27.

[24] *See e.g.,* Senate Bill 901 (2018 Cal. Legis. Serv., Ch. 626; adding Pub. Util Code § 8386(c)(13) regarding restoration of service after wildfire event); Assembly Bill 1054 (2019 Cal. Legis. Serv. Ch., 79, §§ 1(a)(4), 2(a), 2(b)); 49 C.F.R. Section 192, Subparts O and P (DIMP and TIMP programs).

[25] Ex. TURN-04 (Eric Borden & Courtney Lane) at 4.

contributes to the Commission's decision-making process by providing an important tool for measuring and comparing the cost-effectiveness of the programs proposed in this case."[26] While RSEs provide a measure of relative risk-mitigation effectiveness that helps inform the prioritization of investments within a risk chapter, RSEs do not allow for an absolute comparison of costs and benefits. As noted by the Commission, "RSE values produced by the MAVF approach have had limited utility. While the RSE values produced by the MAVF approach allow for comparison of the relative cost-effectiveness of various mitigation measures, the RSE values do not indicate whether the Benefits of a proposed mitigation measure outweigh its costs."[27]

RSE calculations are intended to inform and aggregate risk decision-making based on the MAVF or Multi Attribute Value Function. Regarding the use of RSEs in prioritizing a portfolio, the Commission has stated: "We caution, however, that prioritizing a portfolio based on cost-effectiveness measures, such as the RSE, is not the same as choosing an optimal mix of mitigation activities based on some rigorous optimization routines[.]"[28] SoCalGas and SDG&E agree with the Commission that an RSE is not a replacement for optimization. While RSEs are an informative data point for the Companies to consider, they are not deterministic for mitigation selections. As provided for in direct testimony,[29] no matter the quantification methodology employed, judgment and expertise must be utilized when making decisions. Interpretation of the results of a quantification model are just as, if not more, valuable than the outputs themselves and cannot replace prudent and reasonable risk policies and practices. Certain mitigations are recognized by essentially all interested parties to be important – yet if the RSEs are deterministic, it would suggest important safety and reliability related activities could be treated as a lower priority work.

C. TURN's Use Of Its Own B-C Ratios Should Not Apply

TURN's translation of the Companies' RSEs to its own B-C Ratios should not be applied, as it is outside the scope of this proceeding and does not reflect the purpose of the risk

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[26] *Id*.

[27] D.22-12-027 at 26.

[28] A.15-05-002, CPUC, *Safety and Enforcement Division Evaluation Report on the Risk Evaluation Models and Risk-based Decision Frameworks in A.15-05-002, et al*, at 50.

[29] Ex. SCG-03, Ch.1 (Direct Testimony of Deana M. Ng) and Ex. SDG&E-03-2R, Ch. 2 (Second Revised Direct Testimony of Gregory S. Flores and R. Scott Pearson), at 14-15.

mitigation programs at the Companies. In addition, TURN's approach fails to incorporate concepts critical to the Companies' investment strategy to promote safe and reliable service. For example, International Organization for Standardization (ISO) 31000 provides that: "Justification for risk treatment is broader than solely economic considerations and should take into account all of the organization's obligations, voluntary commitments and stakeholder views."[30]

First, stating that RSEs can or should be expressed as BCRs in dollar terms is premature and outside the scope of this case. The Risk OIR Phase II Ruling[31] establishes that the inaugural application of BCRs as a successor to the prevailing MAVF/RSE framework is deferred to the Companies' 2025 RAMP and ensuing 2028 GRC.[32] Second, TURN's B-C Ratios are derived from RSEs which, as discussed above, are neither deterministic nor allow for absolute comparisons of costs and benefits. Lastly, TURN's approach to deriving its B-C Ratios fails to account for critical elements of the evolving Cost Benefit Framework that remain to be settled, including tail risk, risk tolerance, and risk attitude.

D. TURN's Recommendation to Use the Weighted Average Cost of Capital

TURN compares RSEs with a Program Administrator Cost Test (PACT),[33] and then uses this comparison to argue that the Weighted Average Cost of Capital (WACC) should be used to discount risk mitigation spend.[34] TURN, however, does not provide evidence or rationale to support the comparison between RSEs and a PACT. According to the California Standard Practice Manual,[35] a PACT is more suited to consideration of the cost effectiveness of a program, such as an energy efficiency program associated with end user consumption. In other words, a PACT is suited to evaluating cost, but not risk. The RSE, which is intended to evaluate relative risk reduction benefits, is not comparable to a PACT or any other framework for which

[30] ISO 31000 Risk Management – Guidelines.

[31] D. 22-12-027.

[32] *Id.* at 23-24 (One of the primary reasons the Commission cited for superseding the current MAVF with a prospective Cost Benefit Framework (CBF) is RSEs do not provide for "comparable values and trade-offs in dollars[.]").

[33] Ex. TURN-04 (Eric Borden & Courtney Lane) at 19-20.

[34] *Id.* at 6-7, 11-13, 15, 18-20.

[35] Regulatory Assistance Project, *California Standard Practice Manual: Economic Analysis of Demand-Side Programs and Projects*, October 2001, at 23; available at: https://www.raponline.org/wp-content/uploads/2016/05/cpuc-standardpractice-manual-2001-10.pdf.

the numerator and denominator are both dollar-denominated. The numerator of a RSE is not a dollar-denominated value; it is a unitless combination of reductions to safety, reliability, and financial risk attributes; thus application of a common discount factor to both the numerator and denominator is not justified.

The Companies also disagree with TURN's statement that the Companies incorrectly used base year direct dollars and a 3% discount rate.[36] TURN notes that the purpose of the original rulemaking, R.13-11-006, was to "incorporate a risk-based decision-making framework into the Rate Case Plan (RCP) for the energy utilities' GRCs[.]"[37] TURN, however, then goes on to state: "In fact, the Rate Case Plan (RCP) has no bearing on RSE calculations."[38] The Companies disagree and believe that the Rate Case Plan does have a bearing on RSE calculations since costs utilized in the calculation of RSEs are consistent with the Companies' presentation in their respective General Rate Cases.

As mentioned in their 2021 RAMP Reports, the Companies are not opposed to the concept of discounting.[39] The 3% discount rate represents a federally accepted value for societal, and safety impacts,[40] hence it is used in the Companies' RAMPs and GRCs. TURN states that because the RSE accounts for other benefits, like electric and gas reliability, the discount rate of 3%, which is primarily referencing a safety benefit, should not be used.[41] The WACC, however, takes no consideration of safety into its determination and is therefore inappropriate for discounting in RAMP. Further, in SCE's 2022 RAMP filing, the Commission neither endorsed nor rejected SCE's 3% discount rate for the numerator, stating that SCE should use its best

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[36] Ex. TURN-04 (Eric Borden & Courtney Lane) at 6, 8-9, 15, 24.

[37] *Id*. at 11-12 (citing D.18-12-014 at 3).

[38] *Id*. at 13.

[39] A.21-05-014, Application Of Southern California Gas Company (U 904 G) To Submit Its 2021 Risk Assessment And Mitigation Phase Report; D.21-05-011, Application Of San Diego Gas & Electric Company (U 902 M) To Submit Its 2021 Risk Assessment And Mitigation Phase Report.

[40] CDC, The National Institute for Occupational Safety and Health, *Economic Burden of Occupational Fatal Injuries in the United States Based on the Census of Fatal Occupational Injuries, 2003-2010*, August 2017, available at: https://www.cdc.gov/niosh/data/datasets/sd-1002-2017-0/default.html.

[41] Ex. TURN-04 (Eric Borden & Courtney Lane) at 17-18.

expert judgment, accompanied by a transparent justification, to apply a reasonable discount rate for the numerator.[42]

E. The Companies Appropriately Calculated Post-Test Year RSEs

TURN also takes the position that the determination of Post-Test Year forecasts is inconsistent with the determination of Test Year forecasts,[43] but there is no Post-Test Year requirement or mechanism currently in place. The methodologies used to forecast Post-Test Year dollars and risk benefits are a balance of the new requirement to calculate Post-Test Year RSEs by the Commission in this proceeding,[44] the existing Settlement Agreement, and the Rate Case Plan. Additionally, Commission precedence favors escalation-based forecasting for the Post-Test Years.[45] TURN's argument here does not make the important connection between the Rate Case Plan and the Risk Decision Framework, which the Commission is further looking to expand upon in Phase III of Risk OIR.[46]

In sum, the exact value of the discount rate, nature of costs, and application of both thereof, is appropriately scoped for Phase III of the SMAP,[47] and not this GRC proceeding.

F. The Companies Have Performed Sufficient Tranching and are in Compliance with the Settlement Agreement

TURN states there is insufficient granularity of tranches in specific risk calculations associated with Wildfire, and Medium and High Pressure Gas Systems. [48] The Companies

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[42] A.22-05-013, CPUC, *Safety Policy Division Staff Evaluation Report on the Southern California Edison Company's 2022 Risk Assessment and Mitigation Phase (RAMP) Application*, November 10, 2022, at 18.

[43] Ex. TURN-04 (Eric Borden & Courtney Lane) at 10.

[44] A.21-05-011, Assigned Commissioner's Ruling Directing Sempra Utilities to Incorporate Staff Recommendations on their Risk Assessment and Mitigation Phase in the Upcoming 2024 General Rate Case Applications, March 30 2022, at 3 (requiring the Companies to calculate PTY RSEs for their TY2024 GRC).

[45] D.19-09-051 at 708 ("We find that Global Insight escalation rates are specific to the utility industry and more accurately reflects SDG&E's and SoCalGas' inflationary cost increases.").

[46] R.20-07-013, Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities. Safety Policy Division Proposed Phase III Roadmap.

[47] *Id*.

[48] Ex. TURN-04 (Eric Borden & Courtney Lane) at 34.

disagree. As discussed in direct testimony,[49] and as recommended by SPD, the Companies added more tranches between the 2021 RAMP and the current GRC[50] across key risk areas and have met the requirements of the Settlement Agreement.[51] Specifically, the Companies incorporated 31 additional levels of tranche granularity across 11 of the Companies' 15 key risks. These key risk areas included high pressure (added facilities and supply line), medium pressure (added service/main and steel/plastic), and wildfire (where SDG&E continued expanding its WiNGS-Planning model to identify hardening mitigations at the circuit-segment level). The selection of tranches is based on how risks and assets are managed, data availability, best practices, and model maturity.

IV. CONCLUSION

To summarize, any changes to the Risk Decision Framework should appropriately be discussed and decided within the confines of the Risk OIR. As detailed in our direct testimony, the Companies' RAMP showing in the GRC is based on the requirements adopted by the Commission.

Our direct and rebuttal testimony establishes that RSE calculations are useful to help inform decision-making, but do not allow for absolute determination of costs and benefits, and are not intended to be used as the singular basis for determining whether to authorize cost recovery for proposed safety and reliability activities in a GRC. Indeed, RSEs are not fit for that purpose. We recommend that the Commission continue to evaluate proposed utility safety and reliability investments in light of all relevant information.

This concludes our prepared rebuttal testimony.

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[49] Ex. SCG-03, Ch.1 (Direct Testimony of Deana M. Ng) and Ex. SDG&E-03-2R, Ch. 2 (Second Revised Direct Testimony of Gregory S. Flores and R. Scott Pearson), at 10.

[50] A.21-05-011 and A.21-05-014, San Diego Gas & Electric Company (U 902 M) and Southern California Gas Company (U 904 G) comments on Safety Policy Division's evaluation on SDG&E and SoCalGas's Risk Assessment and Mitigation Phase Report, December 6, 2021.

[51] D.18-12-014; *Id.*, Appendix A, Settlement Agreement.

APPENDIX A
GLOSSARY OF TERMS

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GLOSSARY OF TERMS

ACRONYM	DEFINITION
BSRP	Bare Steel Replacement Program
BCR	Benefit Cost Ratio as determined by the Commission
B-C Ratio	Benefit Cost Ratio as determined by TURN
GRC	General Rate Case
OIR	Order Instituting Rulemaking
PTY	Post Test Year
RAMP	Risk Assessment Mitigation Phase
RCP	Rate Case Plan
RDF	Risk-Informed Decision-Making Framework
RSE	Risk Spend Efficiency
SA	Settlement Agreement
SDG&E	San Diego Gas & Electric Company
SED	Safety Enforcement Division
S-MAP	Safety Model Assessment Proceeding
SPD	Safety Policy Division
TURN	The Utility Reform Network
TY	Test Year
WACC	Weight Average Cost of Capital