



COM/DH7/mef 7/30/2021

FILED
07/30/21
12:24 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas &
Electric Company (U902M) to
Submit Its 2021 Risk Assessment
and Mitigation Phase Report.

Application 21-05-011

And Related Matter.

Application 21-05-014

ASSIGNED COMMISSIONER'S SCOPING MEMO AND RULING

Summary

This Scoping Memo and Ruling (Scoping Memo) sets forth the category, issues to be addressed, and schedule of the proceeding pursuant to Public Utilities (Pub. Util.) Code § 1701.1 and Article 7 of the Commission's Rules of Practice and Procedure (Rules).

1. Background

On May 17, 2021, San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) filed their respective 2021 Risk Assessment Mitigation Phase (RAMP) Applications and the RAMP Reports pursuant to Decision (D.) 14-12-025.

SDG&E's and SoCalGas' RAMP Reports provide an initial quantitative and probabilistic assessment of their top safety risks, controls or mitigations currently in place, plans for improving mitigation activities, alternative mitigations and estimates of costs of the proposed mitigations. The mitigation plans and cost estimates are informed by Risk Spend Efficiency (RSE) calculations and considered alternative mitigations.

The RAMP reports follow the guidelines set forth in D.16-08-018 for what the RAMP submission should include, and the methodologies and new guidelines contained in the Safety Model Assessment Proceeding (S-MAP) Settlement Agreement was approved in D.18-12-014.

The Commission's Safety Policy Division (SPD) is required to review SDG&E's and SoCalGas' RAMP Report and issue an evaluation report. Parties are allowed to file comments to SDG&E and SoCalGas RAMP Reports and SPD's evaluation report. The RAMP filing and comment process shall then form the basis of SDG&E and SoCalGas's assessment and proposed mitigations for its safety risks in its next General Rate Case (GRC) filing.

On June 9, 2021, Mussey Grade Road Alliance (Mussey Grade) filed a Protest. Southern California Edison Company (SCE) filed a Response on June 16, 2021. The Public Advocates Office (Cal Advocates), The Utility Reform Network (TURN), Protect Our Communities Foundation (PCF), Utility Consumers' Action Network (UCAN), filed their respective Protests on June 21, 2021.

SPD organized a post-filing workshop on June 17, 2021. On July 12, 2021 Sempra Utilities held a second post-filing workshop.

On July 7, 2021, prehearing conference (PHC) statements were filed jointly by the applicants SDG&E and SoCalGas and Cal Advocates, and jointly by TURN, and Mussey Grade.

On July 13, 2021, a telephonic PHC was held to address the service list, discuss the scope, schedule, and other procedural matters.

2. Scope

Based on the application, PHC statements, and discussion during the PHC, the scope of issues to be addressed in these consolidated proceedings are as follows:

1. Whether the RAMP Report and analysis is complete and in compliance with D.14-12-025, D.16-08-018 and the S-MAP Settlement adopted in D.18-12-014.
2. Whether there are gaps in the RAMP Report in identifying risks and considering mitigation options:
 - a. Whether key safety risks have been adequately identified, assessed, and analyzed.
 - b. Whether risk analysis is adequately supported.
 - c. Whether effective mitigation programs have been developed and defined with sufficient granularity.
 - d. Whether cost effectiveness of mitigations has been reasonably assessed and analyzed.
 - e. Whether alternatives have been fully considered and adequately discussed by the utility.
 - f. Whether safety and other risks associated with PSPS have been considered in the RAMP process.
3. Whether the Multi Attribute Value Function (MAVF) and Risk Spend Efficiencies (RSE) calculations including relative weightings and ranges for safety, financial, and reliability attributes, and whether their impact on risk estimates appropriately represent societal values, are reasonable and consistent with the SMAP settlement.
4. Whether the utility's analysis is transparent and allows for independent validation of its results.
5. Whether RAMP feedback has been adequately incorporated into the utility's 2024 TY GRC filing.
6. Whether the proceeding should be closed or integrated into the utility's 2024 TY GRC.

Issues considered may include assessing impacts on environmental and social justice communities, including the extent to which actions in this proceeding impact achievement of any of the nine goals of the Commission's Environmental and Social Justice Action Plan.¹

3. Schedule

The following schedule is adopted but may be modified by the assigned Commissioner or Administrative Law Judge (ALJ) as required to promote the efficient and fair resolution of these proceedings:

Event	Date
PHC, held	July 13, 2021
Workshops (if needed)/ Sensitivity Analysis	July - October 2021
SPD files evaluation report, filed	October 15, 2021
SPD workshop regarding SPD's report, filed and served	By November 1, 2021
Opening Comments on RAMP report and SPD report, filed and served	November 15, 2021
Reply Comments, filed and served	December 1, 2021
Incorporate RAMP feedback into TY 2024 GRC filing	Ongoing through May 2022
SDG&E and SoCalGas file TY2024 GRC	By May 15, 2022
GRC PHC, held	July 2022
Decision closing application and/or integrating into GRC, issued	4 th Quarter 2022

In any event, we intend that this proceeding will be resolved no later than 18 months from the filing of the application.

At the PHC, TURN raised the possibility of revising the schedule to address motions TURN intends to file relating to compliance with settlement

¹ Available here: [Environmental and Social Justice Action Plan \(ca.gov\)](#).

terms adopted in D.18-12-014. It was resolved that these issues will be addressed if and when such motions are filed.

4. Category of Proceeding, Need for Hearings and *Ex Parte* Restrictions

This proceeding was preliminarily categorized as ratesetting (Resolution ALJ 176-3487). There were no objections in the PHC statements or during discussion at the PHC regarding the categorization. Accordingly, *ex parte* communications are restricted and must be reported pursuant to Article 8 of the Rules.

The need for hearings was discussed at the PHC and parties were in agreement that hearings will not be needed. PCF initially raised concerns about cross-examination of certain witnesses but this issue was addressed and resolved in discussions at the PHC.

This ruling confirms that this is a ratesetting proceeding and hearings are not necessary.

5. Public Outreach

Pursuant to Pub. Util. Code § 1711(a), I hereby report that the Commission sought the participation of those likely to be affected by this matter by noticing it in the Commission's monthly newsletter. The newsletter is served on communities and businesses that subscribe to it and is posted on the Commission's website.

6. Intervenor Compensation

Pursuant to Pub. Util. Code § 1804(a)(1), an intervenor who intends to seek an award of compensation must file and serve a notice of intent to claim compensation by August 12, 2021, 30 days after the PHC.

7. Response to Public Comments

Parties may, but are not required to, respond to written comments received from the public. (*See* Pub. Util. Code § 1701.1(g).) Parties may do so by posting such response using the "Add Public Comment" button on the "Public Comment" tab of the docket card for the proceeding.

8. Public Advisor

Any person interested in participating in this proceeding who is unfamiliar with the Commission's procedures or has questions about the electronic filing procedures is encouraged to obtain more information at [Public Advisor's Office](#) or contact the Commission's Public Advisor at 866-849-8390 or 415-703-2074 or 866-836-7825 (TTY), or send an e-mail to public.advisor@cpuc.ca.gov.

9. Service of Documents on Commissioners and Their Personal Advisors

Rule 1.10 requires only electronic service on any person on the official service list, other than the ALJ.

When serving documents to Commissioners or their personal advisors, whether or not they are on the official service list, parties shall only provide electronic service. Parties must NOT send hard copies of documents to Commissioners or their personal advisors unless specifically instructed to do so.

10. Assignment of Proceeding

Commissioner Darcie L. Houck is the assigned Commissioner and Rafael Lirag and Manisha Lakhanpal are the assigned Administrative Law Judges and Presiding Officers for the proceeding.

IT IS ORDERED that:

1. The scope of the proceeding is set forth in the body of this ruling, unless amended by a subsequent ruling or order by the Assigned Commissioner.

2. The category of the proceeding shall be ratesetting. Hearings are not necessary.

3. *Ex Parte* rules as set forth in Rules 8.1- 8.5 of the Commission's Rules of Practice and Procedure, and Pub. Util Code § 1701.3(c) apply.

4. Any party that expects to claim intervenor compensation for its participation in these proceedings must file its notice of intent to claim intervenor compensation by August 12, 2021.

5. Administrative Law Judges Rafael Lirag and Manisha Lakhanpal are designated as the Presiding Officers in this proceeding.

6. The proceeding schedule is set forth in the body of this ruling, and may be modified by ruling of the assigned Commissioner or assigned Administrative Law Judges, as required to promote the efficient and fair resolution of this proceeding.

This order is effective today.

Dated July 30, 2021, at San Francisco, California.

/s/ DARCIE L. HOUCK

Darcie L. Houck
Assigned Commissioner