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ED Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Re: **OPENING COMMENTS OF SAN DIEGO GAS AND ELECTRIC COMPANY ON DRAFT RESOLUTION M-4849**

In accordance with Rule 14.5 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), San Diego Gas & Electric Company (SDG&E) respectfully submits these Opening Comments on Draft Resolution M-4849 (Draft Resolution). SDG&E generally supports the Draft Resolution and extending the emergency customer protections through June 30, 2021, and requests minor modifications and clarifications discussed below.

I. BACKGROUND

In Decision (D.) 19-07-015, the Commission implemented an Emergency Disaster Relief Program and established a set of minimum emergency disaster customer protection measures that the utilities are directed to implement in the event of a declared emergency.

On March 4, 2020, Governor Gavin Newsom proclaimed a State of Emergency in response to the outbreak of novel coronavirus, COVID-19.¹ On March 13, 2020, President Trump signed an Emergency Declaration to facilitate federal response to the emerging pandemic.²

On March 13, 2020, as an initial response to the developing crisis, SDG&E implemented a voluntary moratorium on all disconnections of service for non-payment.

On March 17, 2020, the Commission's Executive Director sent a letter to the California energy, water and communications corporations stating the Commission's expectation that they would "extend the same applicable consumer protections directed in D. 19-07-015" to utility customers, retroactive to March 4, 2020.³ On March 19, 2020, pursuant to direction from the Executive Director as well as D.19-07-015, SDG&E submitted AL 3516-E/2854-G (Original AL),

¹ See Office of Governor Gavin Newsom, *Governor Newsom Declares State of Emergency to Help State Prepare for Broader Spread of COVID-19* (March 4, 2020), available at <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>.

² See National Conference of State Legislatures, *President Trump Declares State of Emergency for COVID-19* (March 25, 2020), available at <https://www.ncsl.org/ncsl-in-dc/publications-and-resources/president-trump-declares-state-of-emergency-for-covid-19.aspx>.

³ March 17, 2020 Letter from Alice Stebbins Re: Emergency Customer Protections to Support Customers Affected by the COVID-19 State of Emergency.

implementing its emergency disaster relief program for customers impacted by the COVID-19 pandemic. On April 16, 2020, the Commission adopted Resolution M-4842 to ratify the directions provided in the Commission's Executive Director's March 17, 2020 letter. Resolution M-4842 provided that the applicable protections would remain in place for one year, through April 16, 2021, or as otherwise extended.

On May 1, 2020, consistent with M-4842, SDG&E submitted Supplemental Advice Letter 3516-EA/2854-G-A to describe the full suite of protections it was offering its customers, explain which customer protections were inapplicable during the COVID-19 pandemic, and to confirm the costs to be tracked in the COVID-19 Pandemic Protections Memorandum Account (CPPMA).

On May 22, 2020, at the request of the Commission's Energy Division, SDG&E submitted Supplemental Advice Letter 3516-E-B/2854-G-B to remove the discretionary protection measures for medium and large business customers.

On June 3, 2020, at the request of the Commission's Energy Division, SDG&E further supplemented Advice Letter 3516-E-B/2854-G-B to remove references to Resolution E-5074 regarding changes related to the Energy Savings Assistance (ESA) program not addressed in Resolution M-4842.

On June 8, 2020, SDG&E submitted Supplemental Advice Letter 3516-E-D/2854-G-D to correct accounting procedures in the CPPMA.

On January 15, 2021, the Commission's Executive Director issued Draft Resolution M-4849, directing the utilities to extend the emergency customer protections through June 30, 2021, and to separately file transition plans for the expiration of the emergency customer protections for the February 11, 2021 Commission meeting. The Draft Resolution states that Opening Comments are due on January 22, 2021, and Reply Comments are due on January 29, 2021. In accordance with the Draft Resolution, and Rule 14.5, SDG&E respectfully submits these Opening Comments.

II. DISCUSSION

1. Due to SDG&E's CIS System Transition, SDG&E will be Unable to Implement Additional Reporting Requirements

Throughout the Emergency Disaster Relief Program Rulemaking (OIR) (R.18-03-011) and the Disconnection OIR (R.18-07-005), SDG&E has made the Commission aware of the ongoing implementation of its new Customer Information System (CIS) upgrade and noted that it would not be able to add billing or process changes until after the new system has been fully implemented. Due to the upgrade, there is a current freeze on SDG&E's legacy CIS. SDG&E's CIS upgrade is scheduled to go live in early April 2021. Following the CIS go live, the system requires a "stabilization period" to reduce systemic risk and possibility of unforeseen error. The Draft Resolution requires the IOUs to include various progress tracking and reporting requirements in their transition plans.⁴ Any new additional reporting requirements beyond what is already required in the Disconnection OIR are beyond the scope of the current CIS implementation. SDG&E is thus unable to incorporate these changes in the CIS system until system stabilization is completed.

⁴ Draft Resolution at 14-15.

Additionally, the CIS upgrade may create other operational challenges associated with the emergency customer protections. If so, SDG&E will bring those to the Commission's attention as necessary. SDG&E's CIS stabilization period will also include a short operational disconnection moratorium to address any systemic risk or operational challenges, and to make every effort to achieve a seamless transition from a customer perspective. The operational disconnection moratorium will overlap with the extension of the Emergency Customer Protections.

The Draft Resolution states that the IOUs shall report these progress metrics by including them in the monthly Disconnection OIR report.⁵ However, the Draft Resolution does not state when, or which month, the reporting requirements are to take effect. SDG&E seeks clarification on this point.

CONCLUSION

SDG&E appreciates the opportunity to provide these Opening Comments and respectfully requests that the Commission consider the Opening Comments prior to approval of the Draft Resolution.

Sincerely,

/s/ Clay Faber
CLAY FABER
Director – CA & Federal Regulatory

cc:

Service List A.20-03-014, A.19-11-003, A19-09-014,
R.18-07-006, R.18-07-005, R.18-03-011, R.17-06-024,
R15-03-010, R.12-06-013.

⁵ Draft Resolution at 15.