



Laura M. Fulton
Senior Counsel
8330 Century Park Court, CP32F
San Diego, CA 92123-1548
LFulton@SDGE.com

November 13, 2024

VIA ELECTRONIC FILING

OEIS Docket #2023-2025-WMPs

Tony Marino
Acting Deputy Director
Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Re: San Diego Gas & Electric Company's Request for An Extension of Time to Update its WMP Targets to Reflect a Final Decision in its Test Year 2024 General Rate Case

Dear Acting Deputy Director Marino:

SDG&E appreciates Energy Safety's Final Decision approving its SDG&E's 2025 WMP Update. The 2025 WMP Update approval also included guidance that, if SDG&E intends to seek a change to any approved 2025 WMP targets, it is required to "submit a change order request within 10 business days of Energy Safety's issuance" of the decision.

SDG&E anticipates the need to revise certain targets within its 2025 WMP Update, but the extent of those proposed changes depends in large part on the final decision in SDG&E's Test Year 2024 General Rate Case (GRC), currently pending at the California Public Utilities Commission. SDG&E expects to receive its final GRC decision by the end of 2024, and plans to submit a change order request reflecting changes to wildfire mitigation initiative targets consistent with the GRC Final Decision and CPUC guidance.¹ Given the current lack of certainty regarding SDG&E's final GRC

¹ "The Commission notes that SDG&E's current approved WMP may be modified based on this [GRC] decision, as Energy Safety may authorize WMP changes to align the utility's WMP with a rate setting proceeding." *Proposed Decision Addressing the Test Year 2024 General Rate Cases of Southern California Gas Company and San Diego Gas & Electric Company*, California Public Utilities Commission, A.22-05-016 (combined) (October 18, 2024) at 461.

decision, SDG&E respectfully requests that Energy Safety extend the timeline to consider a change order request for SDG&E's approved 2024 and 2025 WMP targets until 30 days after issuance of a Final Decision in SDG&E's GRC.

Sincerely,

/s/ Laura Fulton

Laura Fulton

Attorney for

San Diego Gas and Electric Company