



February 24, 2025

Dan Skopec  
Senior Vice President and Chief Regulatory Officer  
San Diego Gas & Electric Company  
8330 Century Park Court, CP33A  
San Diego, CA 92123-1530

**Subject: Denial of Extension Request for 2025 Wildfire Mitigation Plan Update Change Order Request and the Change Order Request**

Mr. Skopec:

The Office of Energy Infrastructure Safety (Energy Safety) denies San Diego Gas and Electric Company's (SDG&E's) request for an extension of time to submit a change order request for its 2025 mitigation initiative targets, submitted November 13, 2024, and the change order request, submitted January 27, 2025.<sup>1,2</sup> SDG&E has until April 10, 2025 to file a petition to amend.

On October 30, 2024, Energy Safety issued its Decision approving SDG&E's 2025 WMP Update and instructed SDG&E to submit any change order request for its 2025 mitigation initiative targets within 10 business days.<sup>3</sup> On November 13, 2024, SDG&E submitted a request for an extension until 30 days after issuance of a final decision in its Test Year 2024 General Rate Case (GRC), stating a need to revise targets in its 2025 WMP Update based on the contents of

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<sup>1</sup> [San Diego Gas and 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](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57613&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57613&shareable=true>, accessed February 21, 2025).

<sup>2</sup> [San Diego Gas and Electric 2025 Change Order Request](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57876&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57876&shareable=true>, accessed February 21, 2025).

<sup>3</sup> [Decision for SDG&E 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57541&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57541&shareable=true>, accessed February 21, 2025).

that decision.<sup>4</sup> The California Public Utilities Commission (CPUC) issued a decision addressing the 2024 Test Year General Rate Case of SDG&E on December 23, 2024.<sup>5</sup> On January 27, 2025, SDG&E filed a change order request to amend its 2025 mitigation initiative targets.<sup>6</sup>

On February 21, 2025, Energy Safety adopted Base WMP Guidelines to allow electrical corporations to file petitions to amend their WMPs to align the WMP with a CPUC decision in a GRC proceeding. Pursuant to these guidelines an electrical corporation must file its petition to amend within 45 days of the relevant GRC decision or any CPUC order modifying that decision.<sup>7</sup>

SDG&E identified in its change order request that it is requesting changes to its 2025 mitigation initiative targets to align with a decision from a CPUC GRC proceeding.<sup>8</sup> Changes to align with a CPUC GRC decision are more appropriately addressed in a petition to amend. As the WMP guidelines related to petition to amend were not in effect until February 21, 2025, SDG&E did not have opportunity to file a petition to amend within the required timeline. An extension for the submission of a petition to amend is warranted.

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<sup>4</sup> [San Diego Gas and 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](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57613&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57613&shareable=true>, accessed February 21, 2025).

<sup>5</sup> [Decision Addressing the 2024 Test Year General Rate Cases of San Diego Gas & Electric Company](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf)

(<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf>, accessed February 21, 2025)

<sup>6</sup> [San Diego Gas and Electric 2025 Change Order Request](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57876&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57876&shareable=true>, accessed February 21, 2025).

<sup>7</sup> [Wildfire Mitigation Plan Guidelines](#), p. 171,

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true>), accessed February 24, 2025.

<sup>8</sup> [San Diego Gas and Electric 2025 Change Order Request](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57876&shareable=true), p. 1

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57876&shareable=true>, accessed February 21, 2025).

**SDG&E’s request for an extension of time to submit a change order request for its 2025 WMP Update, and the change order request for its 2025 WMP Update, are denied. SDG&E has until April 10, 2025, to file a petition to amend its WMP to align the WMP with CPUC’s decision addressing the 2024 Test Year General Rate Case of SDG&E.**

Energy Safety’s WMP Guidelines provide more information on conditions and required components of a petition to amend.<sup>9</sup>

Sincerely,

/s/ Tony Marino

Tony Marino  
Acting Deputy Director | Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

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<sup>9</sup> [Wildfire Mitigation Plan Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true), pp. 171-173, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true), accessed February 24, 2025.