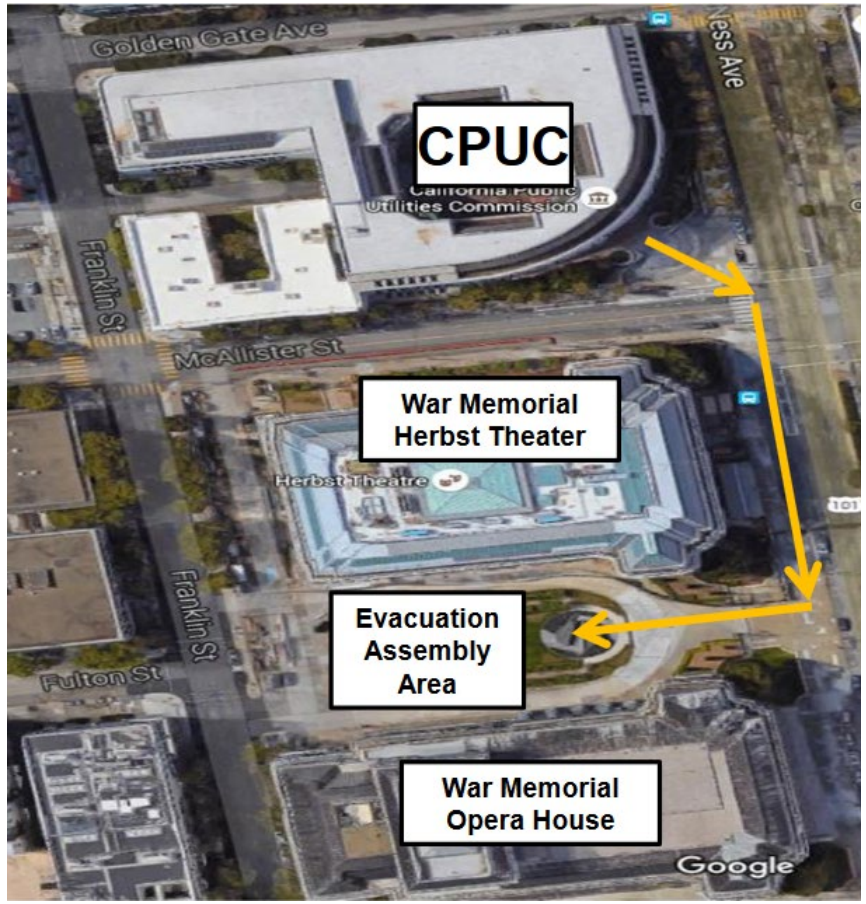
Public Workshop on the Electric Utilities' First Biannual Energization Timelines Data Reports

California Public Utilities Commission, Energy Division
Allison Hoops, Public Utilities Regulatory Analyst
June 30, 2025, 9:00 AM – 3:00 PM Pacific Time

California Public Utilities Commission

Safety Instruction.

- In case of an Emergency
  - Staff will call 911
  - To evacuate, proceed out of 1 of 4 exits to Civic Center Plaza
    - Exit toward Van Ness / McAllister
    - Walk past City Hall
- Bathrooms & water fountain across the Lobby.



Ground Rules and Workshop Logistics

- **Ground Rules:**
  - Hold all questions until the end of each panel
  - Identify yourself and your organization before speaking
  - Do not repeat what another person has already said
  - Stay on topic
- **Workshop Logistics**:
  - Workshop is being recorded and will be posted on the CPUC's webpage along with presentation slides
  - WebEx and phone participants are reminded to stay muted until called on
  - Webex participants type questions/comments to 'Chat Me!' and they will be read aloud

Purpose & Goals of Today's Workshop

Purpose:

- Provide a platform for IOUs to present their first biannual energization report submission in accordance with D. 24-09-020.
- Facilitate a public discussion to evaluate and improve the data reporting template, with a focus on increasing transparency, consistency, and effectiveness of the data in tracking energization performance.

Goals:

1. Review the structure and completeness of submitted data from PG&E, SCE, and SDG&E to assess whether it enables meaningful oversight of energization performance.
2. Identify inconsistencies, data gaps, or ambiguities in the current reporting approach that limit the CPUC's ability to monitor and enforce adopted energization targets.
3. Gather party feedback on enhancements to the biannual reporting format, including metric definitions and step- by- step tracking aligned with start and end dates.
4. Support statewide data transparency efforts by encouraging cross- utility alignment and best practice sharing.
5. Ensure reported data supports tracking of progress towards accelerating energization timelines and meeting the transparency, equity, and decarbonization goals of SB410 and AB50.

Workshop Agenda

Welcome and Safety	9:00- 9:10
Opening Remarks with President Renyolds	9:10- 9:20
Introduction to Decision 24-09-020	9:20- 9:30
Guidehouse Review of IOUs' First Biannual Energization Reports	9:30-10:05
Break	**10:05- 10:15**
Panel 1: IOUs Discussion on Initial Energization Data Reports and Suggested Modifications for Future Reports	10:15- 11:50
Lunch	**11:50- 1:00**
Panel 2: Stakeholder Discussion on IOUs' Data Reports and Suggested Modifications for Future Reporting Efforts	1:00- 1:50
Open Forum Discussion	1:50- 2:50
Wrap Up and Next Steps	2:50- 3:00

Opening Remarks with President Alice Reynolds

Understanding (D.) 24-09-020: Energization Timelines and Biannual Data Reporting Overview

Allison Hoops
Analyst, Transportation Electrification

Energization Timelines Decision

CPUC approved Decision (D.) 24-09-020 in Phase 1 of the Energization Rulemaking (R. 24-01-018)

- The decision implements the Powering Up Californians Act - Senate Bill 410 (Becker) and Assembly Bill 50 (Wood), which directed the CPUC to define and establish reasonable energization times for new or upgraded electrical loads and establish a process for reporting energization delays to the Commission.
- The decision is designed to expedite the process for connecting homes, businesses, electric vehicles, and other loads to the electric grid.
- The Decision adopted an eight-step energization process for tariff-based energization requests; these steps are intended to provide transparency to the energization process for steps that are within and outside of the IOU's direct control.
- The timelines adopted are based on the utilities' historic energization data and party comments.
- The timelines start once the IOUs' approve a customer's energization request.
- Timelines apply to the large IOUs: PG&E, SCE, and SDG&E and are for all types of energization requests.

Key Terms

- **Energization**: the process to connect new load to the distribution system
- **Interconnection**: the process to connect new generation facilities to the distribution center
- **Rule 15**: standard energization tariff that covers distribution line extensions (from the primary distribution line to the secondary transformer)
- **Rule 16**: standard energization tariffs that cover service line extensions (from the secondary transformer to the meter)
- **EV Infrastructure Rules (Rule 29/45)**: serves as an optional alternative to Rule 16 for all customers, excluding single family residential, installing separately metered or submetered EV charging infrastructure
- **Upstream Distribution Capacity Projects**: projects that address capacity deficiencies related to customer energization requests

Adopted Energization Timelines by Tariff

IOUs must meet or beat these timelines

Energization Type	Average Timeline*	Maximum Timeline*
Rule 15	182	357
Rule 16	182	335
Combined Electric Rule 15/16 or Rule 15 and 29/45	182	306
Electric Rule 29/45**	182	335
Application Decision	10	45
Main- Panel Upgrade	30	45

*Days listed as calendar days.
**PG&E and SCE's EV infrastructure tariffs are identified as Electric Rule 29 for each large electric IOU. SDG&E's EV infrastructure tariff is identified as its Electric Rule 45.

Upstream Capacity Upgrade Projects & Preliminary Timelines

Type of Upgrade	Maximum Timelines*
New or Upgraded Circuit	684
Substation Upgrade	1,021
New Substation	3,242

*Days listed as calendar days.

- **Constructing a new or upgraded circuit** can include any of the follow: install a new 12 kilovolt (kV) circuit, install new 16 kV circuit, install a new 33kV circuit, install a new or upgraded kilovolt ampere- reactive (kVAR) capacitor, install a new switch/ sectionalizing, construct civil projects, and /or install a new circuit breaker. A single project could be as simple as installing a new 12kV circuit or require many of the steps listed above.
- **Substation upgrades** include any project within the substation fence of a preexisting substation. This includes but not limited to projects to increase substation capacity, upgrade substation transformer, replace substation banks, and install new substation banks. Inclusive of projects requiring both a circuit upgrade and substation upgrade together.
- **New substations** include all projects in which a substation is built where one did not previously exist.
- It is recommended upstream capacity upgrades be addressed more robustly in Phase 2 of the proceeding, with further data collection and refinement.

Energization Process Steps & Responsibilities

Step #	Step Name	Description	Responsibility
1	Customer Intake	Customer submits energization request; IOU reviews and establishes "Application Final Submittal" date (AFS); energization clock starts when application is deemed complete and approved.	Shared: Customer initiates, IOU reviews/ approves
2	**Engineering & Design**	**IOU conducts field visits, engineering study, develops project design, determines project cost.**	**IOU**
3	Customer Dependencies	Customer obtains necessary permits, easements, signs contracts, pays fees, completes 3rd party approvals.	Customer
4	**Utility Dependencies**	**IOU obtains its own permits, easements, approvals from authorities having jurisdiction (AHJ).**	**IOU**
5	Customer Site Readiness	For non- Rule 29/45: Customer requests pre- construction meeting/ inspection and completes customer- side construction. For Rule 29/45: Customer requests pre- construction meeting.	Customer
6	**IOU Site Readiness**	**For non- Rule 29/45: IOU conducts pre- construction meeting and inspection.** **For Rule 29/45: IOU preforms site readiness work as required by the tariff.**	**IOU**
7	**Construction**	**IOU schedules and completes utility-side construction (including traffic control, outages, equipment install, etc.).**	**IOU**
8	**Service Energization Provided to Customer**	**Final inspections scheduled/ completed as required. IOU energizes service- project clock stops.**	**IOU**

Reporting: Biannual Data Reports

- Pursuant to D.24-09-020, the IOUs are directed to submit their energization data reports to the CPUC biannually (March 31 and September 30)
- The IOUs' energization data is required to include the following:
  - Performance vs. targets (avg & max timelines)
  - List of overdue projects, reasons, and remedial actions
  - Dependency impacts and scope changes
  - Customer complains and delay reports
  - Constrains and obstacles impacting energization
    - Including issues related to funding, staffing, and equipment availability

Guidehouse Evaluation and Findings of Biannual Energization Reports

Derek Jones & Gavin Aiello
Director & Managing Consultant, Guidehouse

Guidehouse

Energization Timeline Workshop

6/30/2025

outwit complexity™

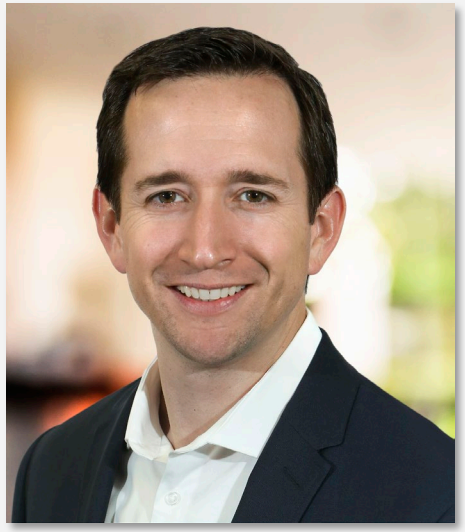
Guidehouse

Agenda

Introduction	5 Minutes
Guidehouse Data Review & Findings	10 Minutes
Framework for Future Assessments	5 Minutes
Recommendations	5 Minutes
Q&A	5 Minutes

Introductions

Your Guidehouse presenters today!



Derek Jones

Director

- Project Oversight
- >15 years in California transportation and energy sectors

Gavin Aiello

Managing Consultant

- Energization Analysis Lead
- >10 years in transportation and energy sectors

IOU Data Disclaimers

In their Narrative Report, the IOUs cited **challenges in accurately reporting** project timelines, project costs, delays and Underserved Communities due to existing system limitations and unclear definitions.

Timelines

- Challenges reporting on Eight (8) Energization Steps due to difficulties **isolating** IOU and Customer steps, **separating** IOU time over concurrent steps, and **lack** of tracking in existing systems

Delays

- Lack of clarity on the **definition** of "**delay**"
- Tracking systems do not effectively **capture delays**

Environmental and Social Justice (ESJ)

- Lack of clarity on the **definition** of "**Underserved Community**"
- Challenges identifying whether project is in ESJ Community at the time of **project planning**

Costs

- Internal accounting **limitations** to accurately report Costs at Time of Energization
- Current data systems insufficient for **granular** Energization Target Reporting Requirement

IOUs identified improved data collection methods, enhanced data analytics and tracking tools, process automation, customer portal upgrade, training programs and stakeholder engagement as **future improvements** to meet the reporting requirements of Decision 24-09-020

Guidehouse Review of Energization Data

Guidehouse assessed **sufficiency** of data (i.e., **availability** and **reliability)** provided in IOU submissions to assess performance against the **Energization Targets** (i.e., target average and target maximum)

Data Availability

Guidehouse calculated the **percent of projects missing data** for each of the fields included in the IOU data submissions

Index Category	Description	PG&E	SCE	SDG&E
Preliminary Project Information	Tariffs, design, business class, location, etc.	0% to 61%	0% to 100%	0% to 88%
Site Capacity and Capacity Requested	Site capacity, requests, categories, etc.	6% to 100%	100%	0% to 60%
Upstream Capacity	Triggered for upstream capacity	0%	100%	0%
Customer Desired Energization Date vs Final Energization Date	Customer energization dates (desired and final)	0.4% to 9%	100%	0% to 0.05%
Tariff Upgrade	Dates for upgrades, planning, construction	6% to 100%	0%	0% to 24%
Customer Elect and Customer Project Delay	R15/16 tariff customer elections	0% to 1%	0% to 100%	0% to 95%
Costing Component	Total cost, staffing, labor, materials, construction, etc.	0% to 36%	0% to 7%	2% to 91%
8 Energization Step Dates	Start and end dates for the 8 energization steps	0% to 99.8%	0%	0% to 96.3%
Concurrent Steps	Energization steps, calendar days, business days	0%	100%	87%
Meeting/Exceeding Energization Targets	Days relative to targets for average, maximum, location and explanation for delays	0% to 100%	0% to 100%	13% to 100%

Data Reliability

Guidehouse **reviewed** the IOU Narrative Reports and **performed quality control analyses** on the IOU submissions to assess threats to internal validity

Internal Validity Threat	Key Metric Description	PG&E	SCE	SDG&E
Missing Data (number of indices)	Tarriff data gaps remaining by September 2026 (Table 1)	3	19	Unavailable
Timeline Data	Ability to accurate project timeline data	No	No	No
Tracking Delays	Ability to track project delays	No	No	No
Environmental & Social Justice	Use of CPUC adopted definition for ESJ communities (ESJ Action Plan version 2.0)	No	No	No
Cost of Project	Ability to provide accurate project costs at time of energization	No	Yes	No
Capacity Reporting	Ability to report on project capacity	Yes	No	No
Outlier Treatment (% of projects)	Outlier data excluded as defined in Decision	Unavailable**	3%	0%

Findings on Data Sufficiency

KEY TAKEAWAY

After reviewing the IOU data submissions from March 31, 2025, Guidehouse determined that there is insufficient data to satisfy the CPUC's analysis requirement of D.24-09-020 for an energization target assessment

Data Availability

- **Gaps** with as many as 100% of projects missing data were found in **key data requirement** categories such as **Customer Delays, Costing Components, and Eight (8) Energization Steps**

Data Reliability

- Guidehouse confirmed the IOUs' disclaimers in the Narrative Reports regarding **general lack of confidence in data validity**

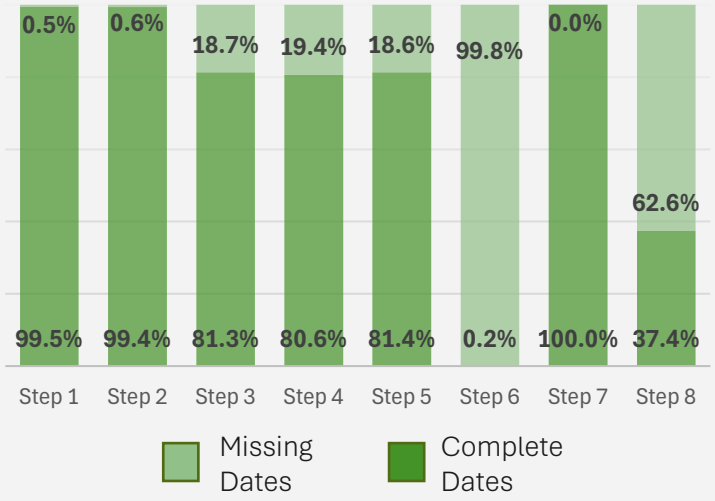
Data Structure

- Despite **insufficient data**, IOUs provided a complete data structure, enabling Guidehouse **to develop recommendations and a framework for future assessments**

Missing Start & End Dates for 8 Energization Steps

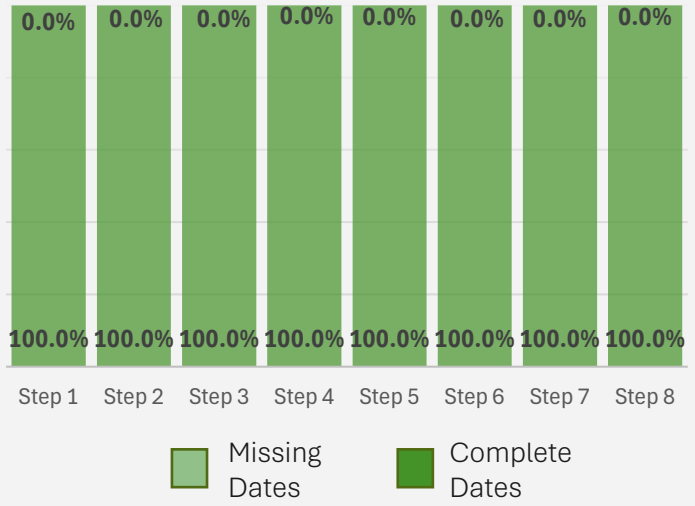
Guidehouse identified a significant number of completed projects missing either start or end dates in PG&E and SDG&E's Data Submission

PG&E
(8,919 Completed Projects)



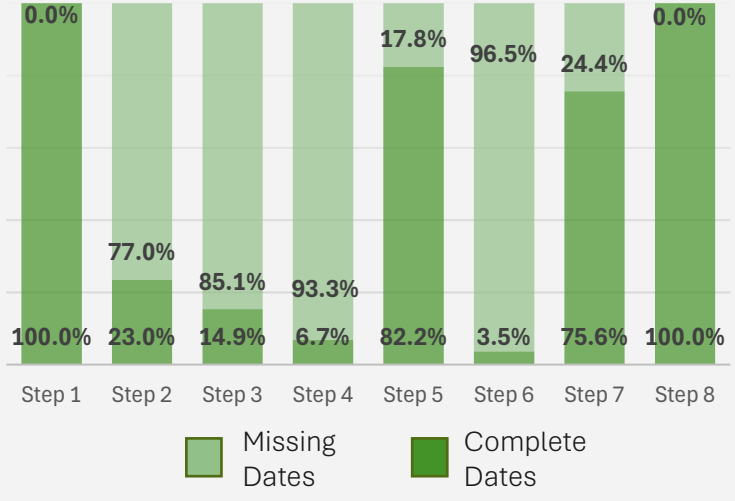
- PG&E identified **Salesforce enhancements** to address reporting gaps for **Step 6 – IOU Site Readiness**
- PG&E identified **improving their records on when meters are set** to address gaps for Step 8 – Energization

SCE
(5,922 Completed Projects)



- SCE was **able to provide start and end dates for all projects** across all steps but noted that turnaround time might not align with the calendar or business days between the dates

SDG&E
(6,505[1] Completed Projects)



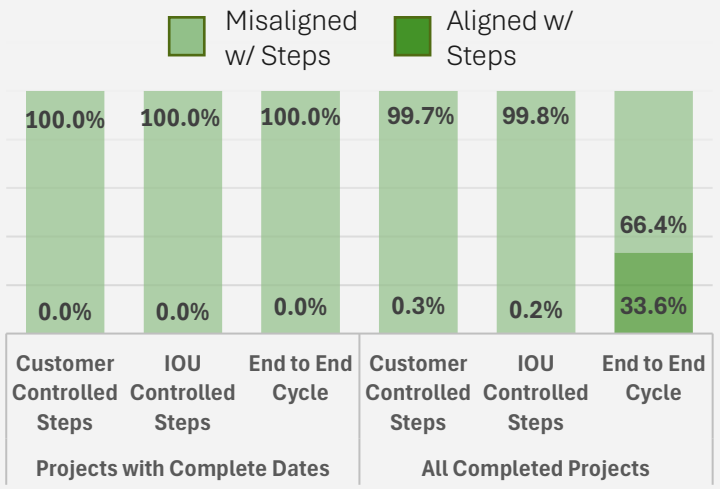
- SDG&E **reported** using 6 steps with **no distinction between Customer and IOU responsibility**
- SDG&E acknowledged they **do not have a system in place** aligned to reporting the eight (8) steps and is exploring enhancements

[1] SDG&E did not remove outliers from their report but noted how to identify outliers in their narrative. Guidehouse has removed SDG&E projects from this analysis based on SDG&E's guidance on outlier identification.

Misalignment in 8 Energization Steps Data

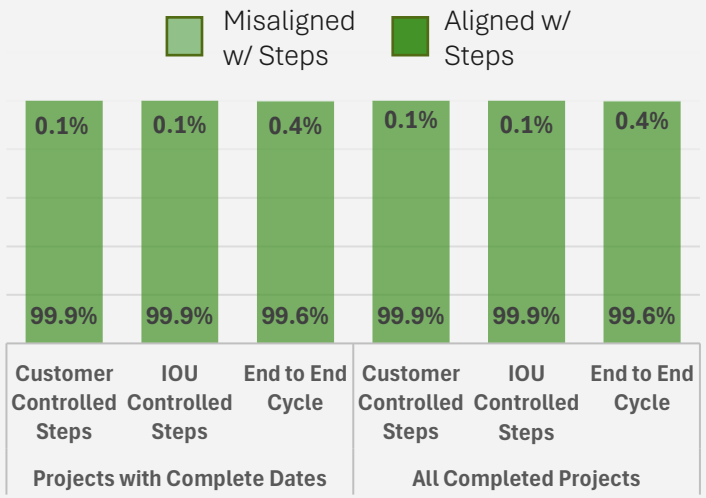
Data quality issues led to substantial misalignment between dates associated with individual steps and the aggregated timelines for IOU steps, Customer steps and End-to-End Cycle steps

PG&E



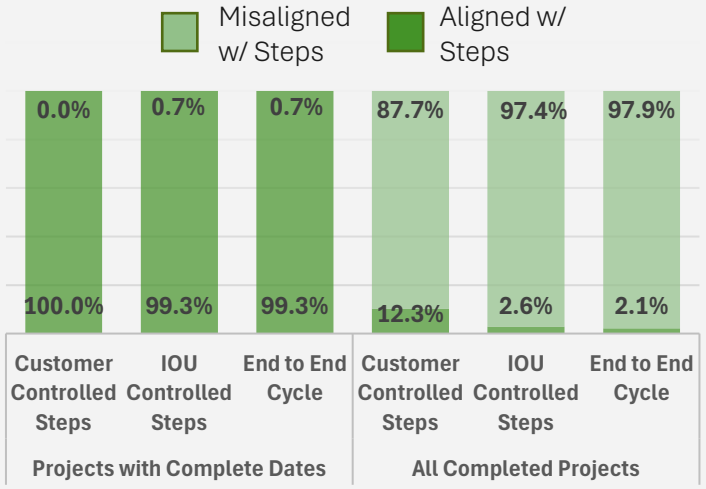
- PG&E's approach to **overlapping Customer/IOU phases** and **concurrent IOU phases** led to misalignment between individual steps and aggregated timelines

SCE



- While SCE had alignment between the summary metrics and the individual steps, they noted in their narrative an **error rate of 10%** was factored into their reported turnaround times, **affecting the accuracy of project timelines**

SDG&E



- When controlling for **projects with complete, non-negative dates for each step (2% of all projects)**, SDG&E's data for individual steps **aligned** with aggregated timelines
- Expanding to the full set of complete projects, **missing dates and negative timelines in Step 1 led to misalignment**

Framework for Future Assessments

Guidehouse provides a framework for future assessments to follow once the IOUs improve data sufficiency

Performance against Targets

Compare the timeline in calendar days for completed tariff projects to average and maximum target by customer type, geography, and tariff

Pre and Post Decision Comparison

Compare completed tariff projects that had a Step 1 – Intake start date before and after the date of the issuance of D.24-09-020 on September 17, 2024

2.7% of completed projects in the March 2025 Energization report had a Step 1 start date after September 17, 2024

Root Cause Assessment

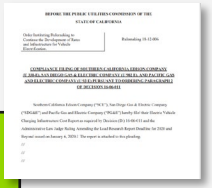
Analyze data on delays associated with R15, R16 and Combined R15/16 projects, as well as the steps leading to exceeding targets for all completed tariff projects to identify trends

Equity and ESJ Considerations

Compare the timeline and delays by ESJ Community versus non-ESJ Community

General Recommendations

Guidehouse recommends that the CPUC and IOU work to enhance reporting in alignment with D.24-09-020 requirements by clarifying key topics

	CPUC	IOUs
Alignment with Other Reports	• Ensure that the D.24-09-020 energization timeline reporting data and the EV Cost & Load Reports are not in contradiction of each other	• Direct IOUs to file joint reports starting in September 2026 Joint reporting as with EV Cost & Load Report to ensure consistency across IOUs 
Improvement of Reporting	• Distribute a reporting template with field-level definitions and request IOU feedback on their ability to meet data sufficiency standards • Provide an accompanying Data Dictionary with reporting template • Revisit when and under what data sufficiency conditions the CPUC should establish energization timeline targets for different project characteristics	• Align definitions of delay, outlier and Underserved Community with D.24-09-020 and PU Code 1601 • Conduct research to identify systemic inefficiencies, improve complaint handling of data, understand project cancellation and analyze in-progress jobs for timely remediations

Q&A and Audience Feedback

- 5 Minutes has been allotted for Questions and Answers
- Q&A and Feedback to focus on:
  - Guidehouse's findings on IOU characterization of submitted data in IOU Narrative Reports
  - Guidehouse's approach to assessing data sufficiency in the IOU Data Submissions
  - Future analysis on project data
- Additional questions should be submitted to Allison Hoops (allison.hoops@cpuc.ca.gov) at CPUC

Break: 10:05- 10:15

Panel 1: Narrative Presentation of Biannual Energization Reports

Introductions

Allison Hoops

Regulatory Analyst with CPUC

Facilitator

Steven Fischer

Sr. Director of Service Planning & Design

PG&E

Aaron Smith

Director of Design and Field Asset Services

SCE

Mary Innamorato

Policy and Data Analytics, Customer Project Management

SDG&E

PG&E's Bi-Annual Energization Report Overview

June 30, 2025

Together, Building a Better California

Outline

- Key Takeaways
- Tariff/MPU Energization Performance
- Distribution Upstream Capacity Performance
- Initiatives Driving Faster Energization
- Examples Concurrent Phase Work
  - IOU Time
  - Customer Time
  - Agency Time
  - Customer Redesign
- OIR Timeline's Financial Reporting
- Utility Site Readiness & Service Energization Data
- Reporting Improvement Initiatives
- Q&A

Key Takeaways from March OIR Submission

- **PG&E is meeting tariff related target energization averages on completed projects:**
  - 84% of PG&Es Energization projects met the statewide average Energization Target of 182-calendar days.
  - 97% of PG&Es Energization projects met statewide maximum Energization Targets (varies by tariff).

- **Anticipate an overall increase in the current 122-Day PG&E timeline driven by:**
  - Approximately 59% of the applications submitted in 2023 and 2024 were not complete by the reporting capture date and are therefore excluded from the average energization timelines.
  - Expansion of the job reporting window itself: as the reporting window grows, we'll capture additional work taking place over a longer period.
  - Availability of Utility Site Readiness and Service Energization (Meter Set) phase data: Better data and more data points will help us assign more accurate and complete timelines to jobs and expand the time to completion for all jobs.

- **Accounting for PG&E and customer time:**
  - Customer Overlap in Phases: To ensure clarity and accountability periods during which a customer-related activity overlaps with a PG&E process that time is designated as customer time. This approach helps shorten cycle times by encouraging PG&E to work simultaneously with the customer and maintains consistent tracking across overlapping phases.
  - Concurrent PG&E Phase Work: In cases where PG&E undertakes multiple overlapping phases concurrently (e.g., two PG&E processes happen at the same time), those overlapping days are not counted multiple times. Instead, they are aggregated as a single day within the total PG&E time count. This approach minimizes delays and encourages PG&E to execute on multiple tasks at once for a more streamlined and efficient customer experience.

Tariff/MPU Energization Performance

	Average Energization PG&E Calendar Days	Average Energization Target Calendar Days	Maximum Energization Target Calendar Days	Average End-to-End Energization Cycle Calendar Days	% Jobs Completed Under Target	Count of Pending Energization Projects
Rule 15	PG&E has no Rule 15-only jobs to report for this filing period as such jobs are uncommon for PG&E applicant requested energization work.					
Rule 16	**122.45**	182 ✅	335 ✅	306.97	97.9%	5,618 (45.7%)
Rule 29	**119.79**	182 ✅	335 ✅	466.66	96.4%	450 (40.1%)
Combined Rules 15/16	**119.14**	182 ✅	306 ✅	320.59	96.4%	6,848 (61.8%)
Combined Rules 15/29	PG&E has no Combined Electric Rules 15 & 29 jobs to report for this filing period as such jobs are uncommon for PG&E applicant requested energization work.					
Main Panel Upgrades	**50.99**	30 ⭕	45 ⭕	61.38	59%	1,255 (5.5%)

The energization timelines are inclusive of only completed (energized) projects which had an application submitted between 1/31/23-12/31/24 and completed as of 3/20/25.

Distribution Upstream Capacity Performance

	Average Energization PG&E Calendar Days	Statewide Maximum Timeline Calendar Days	Completed Projects
New Circuit/Circuit Upgrades	**1,142**	684 ⭕	49
Substation Upgrade Calendar Days	**1,307**	1,021 ✅	20
New Substation Calendar Days	PG&E has no new Substations completed within this filing period		

**The energization timelines are inclusive of only completed (energized) projects completed within 2023 and 2024.*

***Note that many of these projects were identified prior to PG&E's SB 410 request and prior to the timeline target being established.*

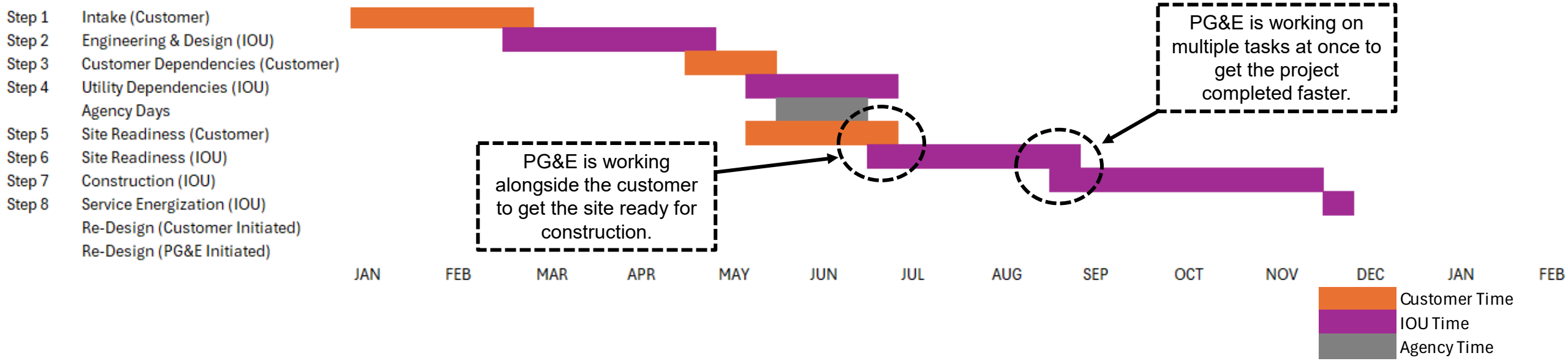
Initiatives Driving Faster Energization

Service Planning and Design (SP&D) implemented PG&E's new Lean operating system, launched the New Business PMO Office, dedicating a full-time team to streamline the connections process, and finding efficiencies to reduce timelines from customer application to connection.

- SP&D upgraded its software to track the status of every new-business application, for improved visibility into how PG&E is meeting its commitments and improved communication for New Business customers.
- PG&E has entered a memorandum of understanding (MOU) with the California Building Industry Association to partner on improving new-service connections:
  - Advance construction scheduling, to schedule connection work as soon as customers pay their contract, rather than waiting to schedule until after all permits are in and sites are construction-ready.
  - Centralized support, to set up a dedicated team of experienced leaders and job owners with monthly forums to escalate issues for the applicant-designers who design interconnections for customers tying into PG&E's system.
  - Interim power solutions, to allow developers to use temporary arrangements to bridge gaps if there's a delay between the requested in-service date and PG&E's in-service date.

Ex: Concurrent Phase Work (Typical)

Mock Timeline Example w/ Concurrent and Overlapping Dates/Phases



Customer Time: Periods during which a customer-related activity overlaps with a PG&E process that time is designated as customer time. This approach helps shorten cycle times by encouraging PG&E to work simultaneously with the customer and maintains consistent tracking across overlapping phases.

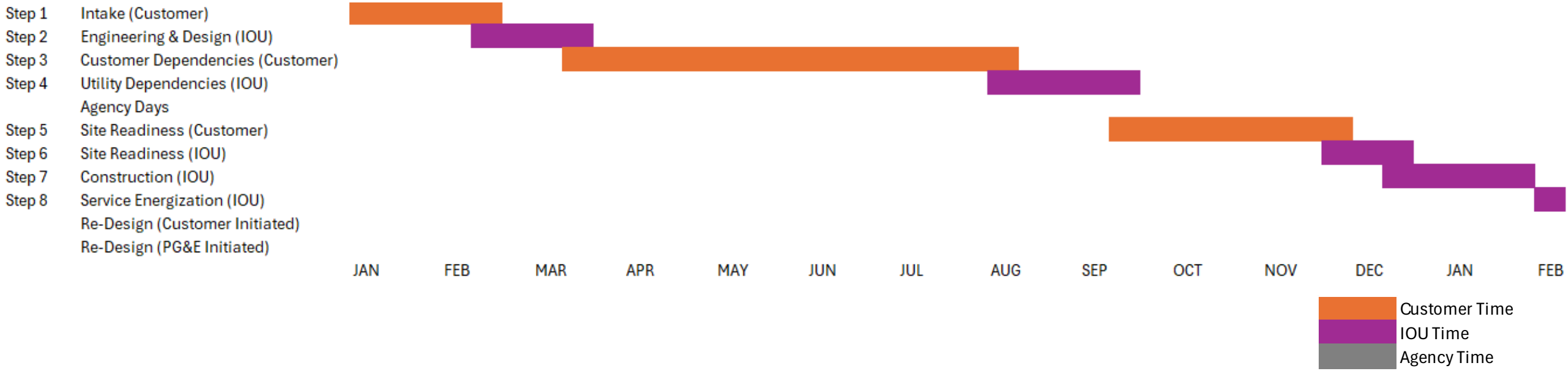
Agency Time: When an agency/permitting time coincides with a PG&E phase(s), this overlapping time is excluded from total IOU Controlled Time.

IOU Time: In cases where PG&E undertakes multiple overlapping phases concurrently those days they are aggregated as a single day within the total PG&E time count. This approach minimizes delays and encourages PG&E to execute on multiple tasks at once for a streamlined customer experience.

*Example Job Above

Ex: Concurrent Phase Work (Customer Time)

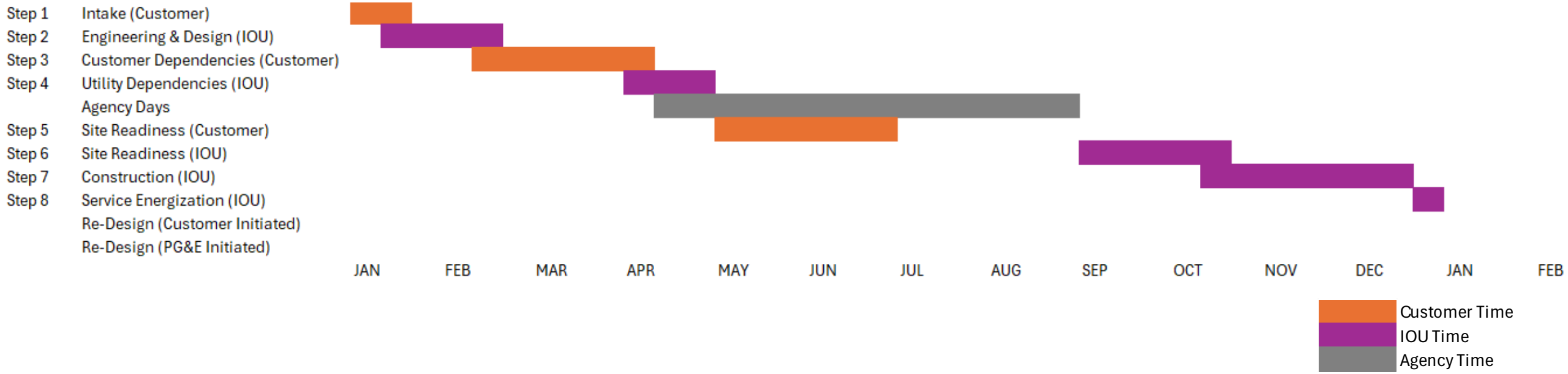
Mock Timeline Example w/ Concurrent and Overlapping Dates/Phases



*Example Job Above

Ex: Concurrent Phase Work (Agency Time)

Mock Timeline Example w/ Concurrent and Overlapping Dates/Phases



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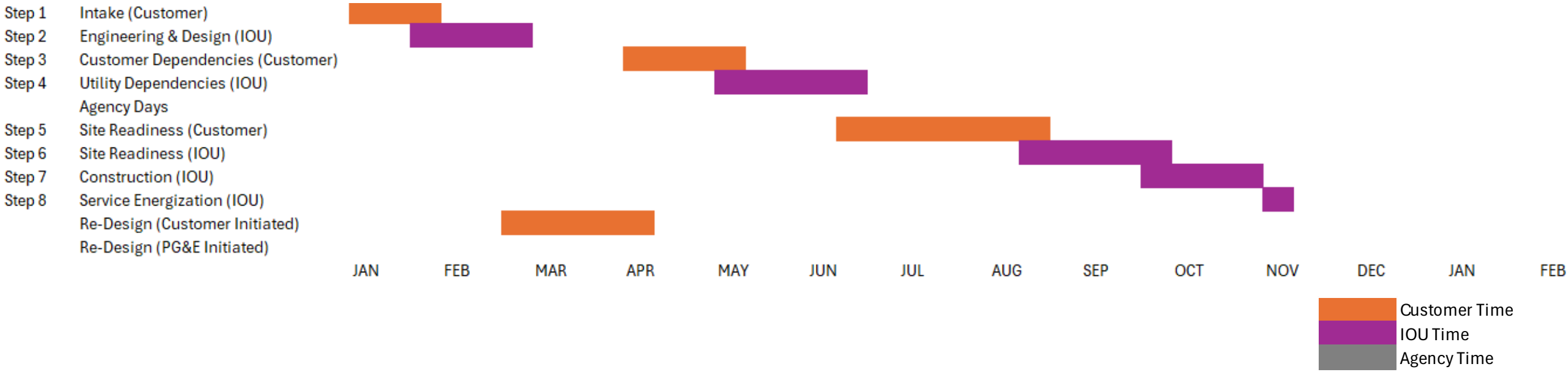
Ex: Concurrent Phase Work (Cust. Re-Design Time)

Mock Timeline Example w/ Concurrent and Overlapping Dates/Phases



*Example Job Above

OIR Timeline Financial Reporting

Figures Provided in Report Are Not Reflective of Actual Project Costs

- As outlined in the OIR decision and reporting template PG&E has provided costs "At time of energization".

- Financial figures provided do not correspond to PG&E's actual incurred costs for those years or jobs.
  - Reporting costs "at time of energization" may lead to inaccurate conclusions about overall new business expenditures. Costs can be incomplete and inconsistent due to:
    - Financial closure not occurring at time of energization because of invoice timing, restoration costs, end of year close accounting practices, and more.
    - Customer payments made to PG&E at initiation for their energization project result in a credit to PG&E as a negative accounting balance. Negative project balances in the form of credits from customer's may not be reconciled until financial closure.

- PG&E's preference would be to defer all financial reporting requirements to our separate rate case submissions or report total costs independent of energization timelines.

Utility Site Readiness & Service Energization Data

At PG&E, we prioritize complete and accurate data reporting to ensure transparency and reliability across all operations. It's important to note that Utility Site Readiness and Service Energization was only partially reported in March's Report, but PG&E is working on increasing reporting data:

Utility Site Readiness Phase

- PG&E recently implemented a new customer facing system to increase communication and better track when a customer confirms a site is ready and requests utility inspection.
- System began limited rollout in late 2024, with full implementation expected by end of 2025.

Service Energization Phase (Meter Set)

- Physical meter sets were previously not included in our standard energization project tracking. Challenges for closing the gap with the service energization include:
  - Meter sets are managed through separate workflows and typically not part of energization construction work.
  - Not all projects will require a meter installation or may reuse a customer's current compliant meter.
  - Meters are managed at the site level for long-term use with changing end-users, energization requests are short-term projects. This structural difference creates gaps in the mapping and management of meter information to individual jobs.

Compliance Improvement Initiatives

Staff Training & Reporting Initiatives

- Reemphasize the importance of consistent and correct process dates across various systems of record.
- Provide hands-on training sessions to reinforce best practices with clerks and job owners.
- Increase focus on documentation of application rejection reasons.
- Standardize documenting reasons for exceeding max and average energization timelines.

Data & Tracking Improvements

- Improving the historic tracking and logging of upstream capacity related projects.
- Rolling out new third-party tools to track customer and utility site readiness phases.
- Addressing gaps with circuit level info, flex and load limiting, main panel upgrade projects and more.
- Captured data on 83% (80 out of 96) reportable fields, PG&E is committed to providing all reportable fields.

Project Execution

- Currently funded for roughly 10,000 projects in 2025, have completed about 5,500 (MWC 16) Projects through May.
- Pending additional SB410 funding that if not approved may have negative impacts on PG&E's ability to meet timeline targets in the future and energize projects.

Q&A

Together, Building
a Better California

CPUC Workshop

Panel 1

SUMMARY: SCE KEY UPDATES

- SCE is committed to meeting the adopted energization targets and has several projects in flight to improve internal processes
- SCE is working to augment data tracking capabilities to comply with reporting requirements and clearly delineate IOU-controlled time
- SCE has already made significant progress to improve customer engagement and experience and is continuing to implement improvements

TIMELINES & COMMITMENT

- Timelines
  - SCE is not currently able to track “IOU Controlled Time” as specified in the Phase 1 Decision
    - Current database does not support tracking specific dates for certain handoffs and transitions
    - Systems currently tracking entire timing for Energization Timelines steps
    - Goal: SCE to have IT systems to track handoffs and transitions within Energization Timelines step tracking which will clearly define the IOU versus customer time

- Commitment
  - Multiple cross-functional teams set up to improve processes and ensure future adherence to order, for reducing actual timelines as well as tracking/reporting

SCE Actions to Improve Project Planning and Execution

- Company-wide changes to improve efficiency for *all* infrastructure planning and construction
  - T&D and SPE wide re-org to better align all organizations and improve efficiency for all work
    - In process prior to SB410, organizational structure finalized April 2025
  - Clear handoffs and priorities developed for each group

- Focused actions to achieve timelines for R15/16/29 projects
  - Improve timelines through process improvements (Kaizens)
    - Focus on MPU mapping and scheduling for more refined timing
    - Review and define consistent definition of substantially complete package
    - Improve start and stop tracking for steps 3-6
    - Define cancel/re-submittal rules
  - All teams overseeing activities within the eight-step energization process are focusing on identifying specific process changes within their respective area

SCE Actions to Address Data Gaps & Limitations

- Addressing Data Gaps
  - BRP3 Customer Portal to increase overall SCE reporting fields (implementation late July)
  - Receiving confirmation on Underserved Communities definition to assist with AHJ tracking

- Limitations
  - Current constraints in system tools to track granularity needed
  - Currently only reporting on ~60% of data needed
  - Customer time is not currently tracked to be able to remove from IOU timeframe
  - Current processes allow flexibility for customer requirement through steps

- Improve tracking to report IOU vs Customer time
  - Redefined start and stop dates for specific steps to improve data accuracy
  - Refine Step 2 IOU time, develop start/stop tracking for customer missing requirements, preliminary map reviews
  - Invest in new systems for data tracking to close reporting gaps

Completed and Future Actions to Improve Customer Engagement

- Increase customer outreach to better communicate with customers
  - Initiated recurring engagement with the California Building Industry Association (CBIA) beginning March 2024 to foster transparent dialogue and gather feedback on energization challenges
    - Conducted targeted working sessions with developers to understand pain points and gather early insights on capacity needs and project timelines
    - Partnered with CBIA and their dedicated task force to address capacity constraints and streamline the submittal process
  - SCE's Customer Solutions Division and Local Public Affairs team continue to engage with customers and communities on an ongoing basis

- Published 8 Step Energization Process, Customer Fact Sheet, and Customer Journey Map to SCE.com

- Successfully piloted new customer service portal (BRP3) with a full launch planned in late July

Recommendations to Improve Reporting Template

- Clarify definition for disadvantaged communities (environmental and social justice requirements)

- Clarify reporting on closed projects
  - Aggregation metrics on completed projects should report on projects closed in current reporting period only
  - Each report should include open projects and projects completed in the current reporting period
    - Previously completed projects still available for review in analysis by referencing previous reports

- Reporting
  - SCE recommends additional guidance to standardize the reporting definitions and narrative framework, instead of joint IOU reporting
    - Joint reporting unnecessarily complicated and likely unworkable based on
      - Experience with joint EV report
      - Different data systems and reporting processes among IOUs
    - Support enhancements to data dictionary and reporting template to help standardize reporting among IOUs

March 2025 Energization Report: Findings and Recommendations

Jennifer Summers – Director, Customer Project Management

Mary Innamorato – Policy and Data Analytics Manager, Customer Project Management

Agenda

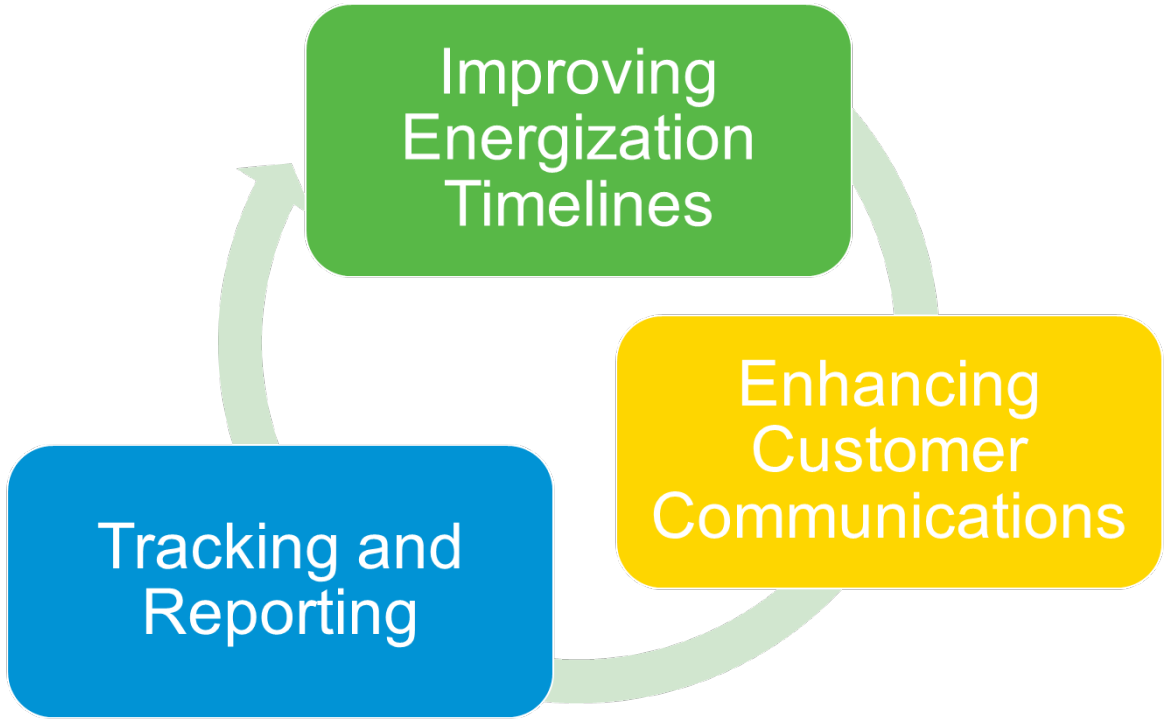
- Improving Customer Experience
- Continuous Improvement
- Performance
- Reporting Challenges
- Future Reporting

Improving the Customer Experience in Energization

SDGE is addressing the top five needs shared by customers through listening sessions, working groups, and customer survey responses.

Top 5 Customer Needs:

- **Single Point of Contact**
- **Collaborative Coordination**
- **Transparent Interactions**
- **Proactive Communication**
- **Thoughtful Consideration**



Continuous Improvement: Improving Energization Timelines

- **System Enhancements**
  Align with 8 steps, automate and streamline processes
- **Operational Changes**
  Cross-functional strategic initiative to assess opportunities to accelerate timelines
- **Support for ESJ Communities**
  Dedicated programs/initiatives to meet unique needs and energization timelines for all customers
- **Performance Metrics**
  SDG&E's average energization timelines reflect improvement

Continuous Improvement: Enhancing Customer Experience

- **Stakeholder Engagement**
  Surveys and listening sessions to gather feedback and suggestions for improvement
- **Customer Education**
  Energization process: Steps, timelines, and what to expect along the way
- **Customer Support Enhancements**
  Departmental reorganization to enable single point of contact
- **Website & Portal Improvements**
  Update to customer resources with focus on customer experience

Continuous Improvement: Data Collection

- **Data Availability**
  Developing systems to track granular data, including delays, customer dependencies, etc.
- **Tracking and Reporting**
  Exploring and implementing systems to automate and streamline reporting where feasible
- **Data Accuracy**
  Will improve with granular data and less manual processes

Performance: Timelines Pre-Decision

Tariff/Rule	Job Count - AFS 1/31/23 to 12/31/24	Job Count – AFS to Energized 1/31/23-12/31/24	Average Timeline (Business Days)	CPUC Target Average Timeline	% Meeting Average Target
R15	596	285	207	125	30%
R15_16_Combo	213	72	235	125	22%
R15_45_Combo	19	2	297	125	0
R16	11430	6337	115	125	66%
R45	39	9	327	125	0
MPU	3133	2788	86	30	20%
Total Count	15430	9491			

Performance: Timelines Post Decision

Tariff/Rule	Job Count - AFS 9/17/24 to 12/31/24	Job Count – AFS to Energized 9/17/24-12/31/24	Average Timeline (Business Days)	CPUC Target Average Timeline	% Meeting Average Target
R15	16	0	N/A	125	N/A
R15_16_Combo	7	0	N/A	125	N/A
R15_45_Combo	0	0	N/A	125	N/A
R16	1626	273	29	125	100%
R45	1	0	N/A	125	N/A
MPU	470	232	26	30	65%
Total Count	2120	505			

Performance: Enhancing Communications

- **Stakeholder Engagement**
  Listening session and surveys
- **Customer Education**
  Energization process and feasible expectations
- **Webpage and Online Portal**
  Updating to align with 8 steps and provide customers with multilingual collateral
- **Single Point of Contact (SPOC)**
  Organizational restructure and updating processes

Performance: Data Tracking & Reporting

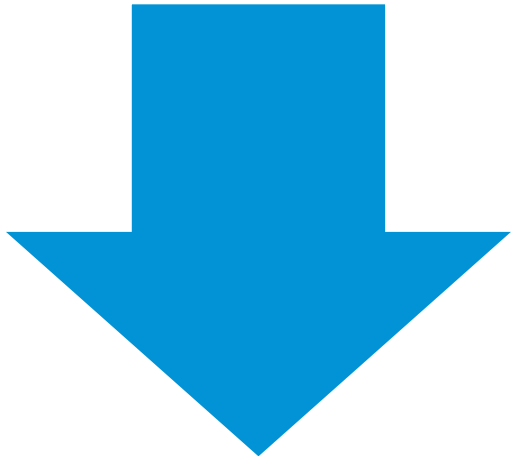
Performance Overview

- “AFS to Energization” timeline is the most accurate and representative
- Many reported jobs predate the compliance requirement (Sept 17, 2024)
- Operational improvements implemented
- Preliminary results show strong performance

Limitations of Current Metrics

- The 8-Step Energization Framework does not align well with SDG&E’s operational processes.
- Concurrent and overlapping activities make it difficult to isolate step durations
- Tariff and MPU timelines do not accurately reflect end to end timelines
- Customer dependencies introduce variability not captured in the current structure

Performance: Process Alignment



SDG&E's
Stage Gates

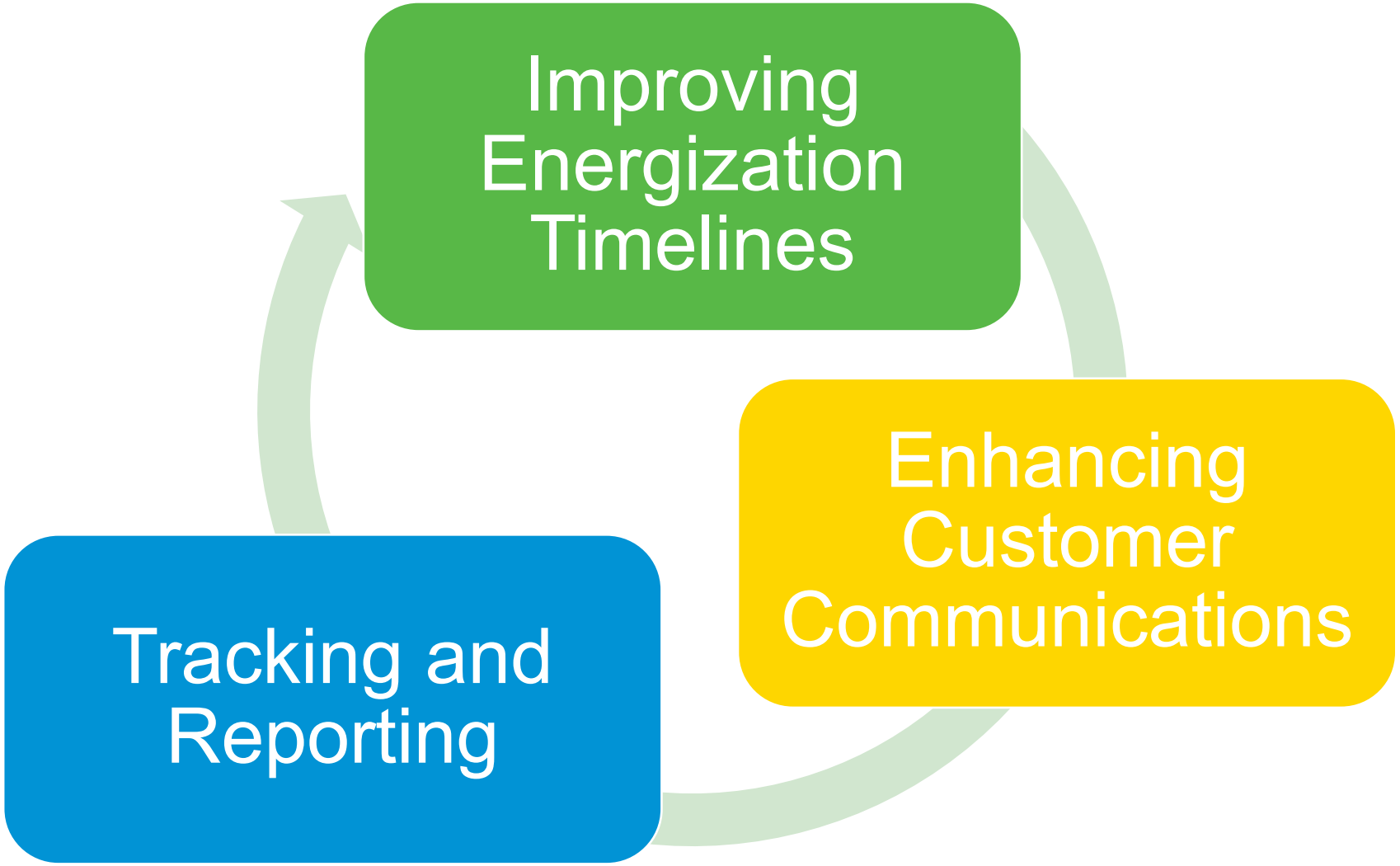
8 Statewide
Steps to
Energization

Reporting Challenges

Future Reporting: Recommended Improvements

- **Capacity Data Simplification**
  Reduce complexity by aligning more with utility practices and avoiding misrepresentation of future load planning needs.
- **Increase Alignment with Operational Practices**
  Eliminate data fields not used by SDG&E in practice, preventing unnecessary process changes, and ensuring the report focuses on relevant, actionable information that supports energization timelines.
- **Narrative Use for Qualitative Data**
  Improve clarity by shifting context-heavy explanations into narrative sections, reducing duplication and easing planner workload, which allows for more focus on customer support and project delivery.
- **Timeline Accuracy Enhancements**
  Enable clearer end-to-end tracking of project milestones, supporting compliance with SB410 and improving visibility into energization timelines.
- **Remove Cost Data**
  Streamline reporting by removing complex, delayed cost reconciliation fields and focusing instead on energization specific metrics that better align with SB410's objectives.

SDG&E's Commitment To Continuous Improvement




SDGE™
Thank you

Lunch: 11:50- 1:00

Panel 2: 3rd Party Present concerns– CUE and Terawatt

Panelists

Allison Hoops

Regulatory Analyst with CPUC

Facilitator

Darion Johnston

Attorney

Coalition of Utility Employees (CUE)

Jason Berry

Sr. Director Energy & Utilities

TeraWatt Infrastructure

SECTION 935:
ENERGIZATION WORKFORCE PLANNING AND REPORTING

PREVIEW

The Powering Up Californians Act

Section 935: Workforce Planning Requirements

935(a), 935(b), 935(c)

Section 935 Analysis: Essential Elements

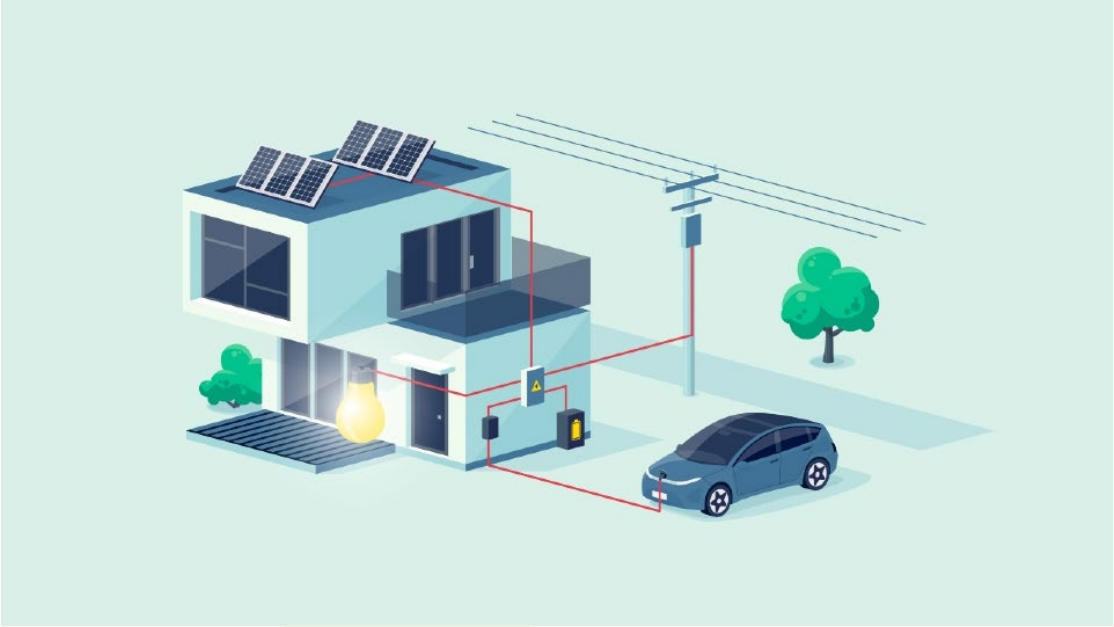
Commission Oversight Role

CUE Recommendations

POWERING UP CALIFORNIANS ACT

- Section 935 established workforce development, planning and reporting requirements to ensure prompt energization without sacrificing other necessary activities of the workforce

- IOUs first energization reports mention staffing constraints but lack a section 935 workforce analysis



PUBLIC UTILITIES CODE SECTION 935(a)+

935(a): "As part of each annual report, including any updates pursuant to subdivision (e) of Section 934, and in each general rate case application, each electrical corporation shall include a detailed analysis of its current qualified staffing level and future required qualified staffing level for each job classification needed to be consistent with the findings and achieve the policies and requirements of this article."

FINDINGS—932(a)(9): "To carry out the planning, engineering, and construction of electrical distribution systems needed to promptly serve customers, each electrical corporation that distributes electricity must recruit, train, and retain an adequately sized, qualified workforce."

POLICIES—933(e): "It is the policy of the state that each electrical corporation. . . Recruit, train, and retain an adequately sized and qualified workforce to carry out the planning, engineering, and construction of electrical distribution systems needed to promptly serve customers seeking energization and service upgrades without sacrificing other necessary activities of the workforce."

PUBLIC UTILITIES CODE SECTION 935(a)

935(a): "As part of **each annual report**, including any updates pursuant to **subdivision (e) of Section 934**, and in **each general rate case** application . . ."

Key Points on Process:

- Annual (minimum)
- GRC report
- And as required by Commission

PUBLIC UTILITIES CODE SECTION 935(a)

935(a): ". . . consistent with the findings and achieve the policies and requirements of this article."

Key Points on Policy:

- IOUs must recruit, train and retain adequate qualified staffing
- To meet energization target time periods
- Without sacrificing other necessary activities of the workforce

PUBLIC UTILITIES CODE SECTION 935(a)

935(a): ". . . a **detailed analysis** of its **current qualified staffing level and future required qualified staffing level** for **each job classification**. . ."

Key Points on Substance:

- Job classifications: planning, engineering and construction of electrical distribution systems
- Holistic analysis: energization and other necessary activities of the workforce
- Workforce Development Plan: Recruit, train and retain adequately sized, qualified workforce

PUBLIC UTILITIES CODE SECTION 935(b)

935(b): "The commission shall require each electrical corporation to have adequate qualified staffing needed to be consistent with the findings and achieve the policies and requirements of this article."

Section 935(a) workforce planning and reporting requirements are designed to ensure the Commission can comply with 935(b)

PUBLIC UTILITIES CODE SECTION 935(c)

935(c): "For job classifications that have apprentice training requirements, **the commission shall require each electrical corporation to maintain a pipeline of apprentices sufficient to meet future qualified staffing needs**, subject to any limitations based on **safe staffing ratios**."

Section 935(c) requirements direct the Commission to ensure IOUs have pipelines of trained workers to meet future staffing needs, consistent with safe staffing ratios

SECTION 935 ANALYSIS: ESSENTIAL ELEMENTS

1. Relevant job classifications (energization + other necessary activities)
2. Current qualified staffing level (*i.e.*, headcount)
3. Future required qualified staffing level (5-year outlook)
4. Recruitment plans (employee/ contractor ratio)
5. Training plans (apprenticeship pipeline)
6. Retention plans (attrition considerations)
7. All supporting data, analyses and assumptions

COMMISSION OVERSIGHT

- Section 935 workforce development planning and reporting requirements should guide proactive workforce development consistent with the requirements of 935(a)-(c)

- With proper planning, IOUs can ensure adequate staffing to meet energization timelines without drawing staffing away from other necessary safety and reliability work and right-size reliance on contract labor

- Proactive workforce planning supports just and reasonable rates consistent with Pub. Util. Code § 451

SUMMARY OF CUE RECOMMENDATIONS

(1) Ensure IOUs include section 935 workforce analyses in energization reports (*include all info discussed today*)

(2) Allow party comments on reports to evaluate completeness and compliance with section 935

(3) Commission to direct IOUs to supplement section 935 workforce analyses if they lack adequate detail

(4) Compliant section 935 workforce analyses support prudent utility workforce planning and management and inform GRC funding requests

THANK YOU

Darion Johnston
Attorney for CUE
djohnston@adamsbroadwell.com

Full-Stack EV Fleet Charging Developer

Mission: We power electrified fleets with the most reliable network of charging solutions.

1. **Real Estate**
   Terawatt Owned
2. **Development**
   Entitlement, Permit
3. **Design and Construction**
   Terawatt designs and constructs
4. **Operations**
   Terawatt develops it own charge management system (CMS), integrates with EVSE, on-site generation, storage, and maintains equipment.

Jason Berry |Vice President, Energy & Utilities

Terawatt Portfolio:

Locations:

- 30+ properties in 18 states
- 20+ sites under development in CA and 7 states (150+MW)
- Private Charging Depots with focus on Fleets
  - Light Duty (Ride Hailing)
  - Heavy Duty (Class 6-8)
- Metro Areas, Logistics, and Corridors (I-10 and I-5)

Active Sites:

- San Francisco - 6MW
- LA - 3.5 MW
- Rancho Dominguez -7MW
- Rialto (Inland Empire) - 8MW
- Commerce - 5MW

Power:

- DC Fast Charging Only
- HD Primary Distribution Service (10MW-25 MW)
- LD Secondary Service (3MW-6MW)
- Securing sufficient short & long term power will be a critical gating item.
  - Leverage Flex Load Programs, On-site Energy Mgmt, & DERs

How We Work with Utilities

Preliminary Engineering Study

- Submit Load Request (During DD period)
- Consider Options for Service
- Phasing in Power
- Estimate Costs
- Flex Load Opportunities

Design Phase

- Submit Complete Application and Customer Design
- Review/Approve Preliminary Design
- MVSG Utility Review and Approval
- Review/Approve Final Utility Design

Construction Phase

- Utility Civil and Electrical Approvals
- Schedule Utility Constructions
- Energize Site

Ongoing Engagement

- Regulatory
- Billing Mgmt
- Rates
- Planning & Forecasting

Energization Opportunities

- Preliminary Capacity Estimates-Faster
- Estimate Costs: Rough-Order-Of Magnitude
  - Similar to Rule 21 Unit Costs
- Very Clear Process Checklists
- Better Project Management Tools
  - Portal with Process/Time Tracking
- Clear Responsibilities
- SLAs for standards and non-standard projects
- Limited Load Schedules

Thank you

Open Discussion

Identified Challenges: Biannual Report

Process	CPUC Recognized Challenge
Reporting Period	March 2025 Biannual Report included projects initiated between January 31, 2023, and December 31, 2024 • SDG&E defines "initiated" as the date of the Applicant Final Submittal
Step Pain Points	• SDG&E: Step 1 – Intake • PG&E: Step 6 – IOU Readiness • PG&E: Step – 8 Energization
Overlapping IOU & Customer Timelines	IOUs highlighted challenges with separating IOU and Customer time for overlapping steps • SDG&E and SCE did not attempt to reconcile double counting due to overlapping IOU and Customer steps • PG&E aggregated all time to the Customer during overlapping IOU and Customer steps
Concurrent IOU Step Timelines	IOUs noted potential for double counting days in aggregated timeline due to concurrent IOU-responsible steps • SDG&E and SCE did not note any attempt to reconcile double counting due to concurrent IOU-responsible steps • PG&E reported full timelines for each step, but reduced any concurrent days to 1 in the aggregated timelines
Approach to ESJ	IOUs requested clarification on the definition of "Underserved Community" • PG&E defined "Underserved Community" using median household income and either statewide median income or low-income threshold designated by the CA Department of Housing & Community Development • SDG&E unable to track ESJ Community as information only available once the end-user has been identified by billing account
Approach to Outliers	IOUs addressed outliers but did not exclusively conform to definition in Decision, specifically negative datapoints or data two standard deviations above average • PG&E and SCE removed outliers from their reported projects • SDG&E did not remove outliers from their reported projects
Future Improvements	All IOUs acknowledged efforts to improve future reporting, including: • Salesforce enhancements • Process improvements • Granular tracking
Missing Data	• SB 410- IOU Workforce Development • Upstream Capacity Projects (SDG&E and SCE) • Clarity on Sept. 2025 reporting period

Closing Remarks

Next Steps

- **CPUC**: No sooners than September 30,2025, if necessary, revise the reporting template via Energy Division resolution, based on workshop input and staff analysis of the first two reports

- **IOUs**: Continue to improve data collection methods and systems and aligning their energization process to match the 8 steps adopted in the Decision.

Thank you for your participation and attendance!

For more information, please contact:

Allison Hoops
allison.hoops@cpuc.ca.gov

Guidehouse

Appendix

Data Availability

Guidehouse data availability assessment (% of missing data).

Index Category	Description	PG&E	SCE	SDG&E
Preliminary Project Information	Tariffs, design, business class, location, etc.	0% to 61%	0% to 100%	0% to 88%
Site Capacity and Capacity Requested	Site capacity, requests, categories, etc.	6% to 100%	100%	0% to 60%
Upstream Capacity	Triggered for upstream capacity	0%	100%	0%
Customer Desired Energization Date vs Final Energization Date	Customer energization dates (desired and final)	0.4% to 9%	100%	0% to 0.05%
Tariff Upgrade	Dates for upgrades, planning, construction	6% to 100%	0%	0% to 24%
Customer Elect and Customer Project Delay	R15/16 tariff customer elections	0% to 1%	0% to 100%	0% to 95%
Costing Component	Total cost, staffing, labor, materials, construction, etc.	0% to 36%	0% to 7%	2% to 91%
8 Energization Step Dates	Start and end dates for the 8 energization steps	0% to 99.8%	0%	0% to 96.3%
Concurrent Steps	Energization steps, calendar days, business days	0%	100%	87%
Meeting/Exceeding Energization Targets	Days relative to targets for average, maximum, location and explanation for delays	0% to 100%	0% to 100%	13% to 100%

*Key: Green: = <10%, Orange: 10-75%, Red: >= 75%

Tariff Data Gaps Remaining (by Sept 2026)

PG&E and SCE identified specific data gaps in their Data Submission and a timeline for providing the data

IOU	Total Data Gaps (% total)	Sept 30, 2025	March 31, 2026	Sept 30, 2026	Undetermined
PG&E	23 Data Points (24%)	15	5	0	3
SCE	30 Data Points (31%)	0	7	4	19

Missing Data Identified by the IOUs

Index	Where Data is Missing	Narrative Est. Reporting Date
AHJ (Authority Having Jurisdiction) for permitting based off Project's location	• SCE data	• SCE: TBD
Total Site Capacity at Time of Customer's Application for Service (kW)	• SCE and PG&E data	• SCE: TBD • PG&E : 09/30/25
Total Site Capacity Requested (kW)	• SCE data	• SCE: 03/31/26
Additional Capacity (kW) installed for future electric load deployment (as applicable)	• PG&E data	• PG&E: 09/30/25
Capacity Request Category: < 1MW, 1 MW to 2MW, >2MW	• SCE data	• SCE: 03/31/26
Project triggered for upstream capacity project (Yes/No)	• SCE and PG&E data	• SCE: 09/30/26 • PG&E: 09/30/25
Date IOU identifies the need for an upstream capacity project and alerts customer of need for upstream capacity project	• All IOU data	• SCE: 09/30/26 • PG&E: 09/30/25
Date IOU completes the upstream capacity project (Date)	• All IOU data	• SCE: 09/30/26 • PG&E: 09/30/25

Missing Data Identified by the IOUs

Index	Where Data is Missing	Narrative Est. Reporting Date
Time to complete upstream capacity project (Calendar Days)	• All IOU data	• SCE: 09/30/26 • PG&E: 09/30/25
Customer Desired Energization Date (Date)	• SCE data	• SCE: 03/31/26
Difference from Customer Desired Energization Date and Final Energization Date (Calendar Days)	• SCE data	• SCE: 03/31/26
Difference from Customer Desired Energization Date and Final Energization Date (Business Days)	• SCE data	• SCE: 03/31/26
Did customer install additional capacity to support future load growth? (Yes/No)	• SCE and PG&E data	• SCE: TBD • PG&E: Unknown
Identify when in energization process the customer requested a change in design or scope (Date)	• SCE and PG&E data	• SCE: TBD • PG&E: 09/30/25
Identify when in energization process the customer requested a change in design or scope (Energization Step)	• SCE and PG&E data	• SCE: TBD • PG&E: 09/30/25
Customer cancelled/delayed project (as needed) (Yes or No)	• SCE and PG&E data	• SCE: TBD • PG&E: Unknown

Missing Data Identified by the IOUs

Index	Where Data is Missing	Narrative Est. Reporting Date
Customer elected to install additional capacity to anticipate associated future load growth as indicated on customer's application	• All IOU data	• SCE: TBD • PG&E: Unknown
Estimated timing for when customer anticipates additional capacity necessary as indicated on customer's application	• All IOU data	• SCE: TBD • PG&E: 03/31/26
Total additional kW capacity for the necessary future upgrade as listed on customer's application	• All IOU data	• SCE: TBD • PG&E: 03/31/26
If full energization of applicant site not feasible in a timely manner, explanation whether load management/flexible service options were installed/utilized to provide applicant with timely service	• All IOU data	• SCE: TBD • PG&E: 09/30/25
Amount of load (kW) provided to applicant using flexible service options	• All IOU data	• PG&E: 09/30/25
At the time energization provided, remaining (or total) unserved load requested by the applicant	• All IOU data	• PG&E: 09/30/25
Estimate when full service will be provided to the applicant for customers using flexible service and/or receiving tiered load schedules	• All IOU data	• PG&E: 09/30/25
Timing for identifying need for R15/16/29/45 upgrade (Calendar Days)	• Some of PG&E data	• PG&E: 09/30/25

Missing Data Identified by the IOUs

Index	Where Data is Missing	Narrative Est. Reporting Date
For R15/R16 tariffs, the time the project was delayed due to customer requested change in design or change in project scope (Yes, No)	• SCE data	• SCE: TBD
For R15/R16 tariffs, the time the project was delayed due to customer requested change in design or change in project scope (Calendar Days)	• SCE and PG&E data	• SCE: TBD • PG&E: 03/31/26
Total Upstream Capacity project cost ($$$)	• All IOU data	• SCE: TBD
Project Costs ($$$) for all IOU equipment for upstream capacity projects: Electric Rule 15, Electric Rule 16, and Electric Rule 29/45	• SCE and PG&E data	• SCE: TBD • PG&E: 09/30/25
IOU assigned account/project manager for initial application (within 10 days) (Yes/No)	• SCE data	• SCE: TBD
Date of IOU rejection of application (Date)	• SCE data	• SCE: 03/31/26
IOU reason for rejection of application (Reason)	• SCE and PG&E data	• SCE: 03/31/26 • PG&E: 03/31/26
Energization Steps Completed Concurrently (Energization Step(s) Listed)	• SCE data	• SCE: TBD

Missing Data Identified by the IOUs

Index	Where Data is Missing	Narrative Est. Reporting Date
Total time for Energization Steps Completed Concurrently (Calendar Days)	• SCE data	• SCE: TBD
Total time for Energization Steps Completed Concurrently (Business Days)	• SCE data	• SCE: TBD
R15/R16/R29 Energization Reasoning as to why exceeded average/maximum Energization Target (Reasoning)	• All IOU data	• SCE: TBD • PG&E: 03/31/25
Location of project exceeding the maximum energization target : Location (circuit level)	• PG&E and SDG&E data	• PG&E: 09/30/25

Data Reliability

The majority of required data fields are insufficient, either missing data (not available) or lacking reliability by Guidehouse's determination

Internal Validity Threat	Key Metric Description	PG&E	SCE	SDG&E
Missing Data (number of indices)	Tarriff data gaps remaining by September 2026 (Table 1)	3	19	Unavailable
Timeline Data	Ability to accurately report project timeline data	No	No	No
Tracking Delays	Ability to track project delays	No	No	No
Environmental & Social Justice	Use of CPUC adopted definition for ESJ communities (ESJ Action Plan version 2.0)	No	No	No
Cost of Project	Ability to provide accurate project costs at time of energization	No	Yes	No
Capacity Reporting	Ability to report on project capacity	Yes	No	No
Outlier Treatment (% of projects)	Outlier data excluded as defined in Decision	Unavailable**	3%	0%

*Key: Green: = 0 or Yes, Orange: = >1, Red: Unavailable or No

**PG&E's exclusion of Residential EV upgrades prevents calculation of total data excluded

Overview of IOU Biannual Report

The IOUs emphasized that their current reporting capabilities are insufficient to meet the granular reporting requirements set out in D.24-09-020

Narrative Topic	Details
Reporting Period	March 2025 Biannual Report included projects initiated between January 31, 2023 and December 31, 2024 • SDG&E defines "initiated" as the date of the Applicant Final Submittal
Step Pain Points	• SDG&E: Step 1 – Intake • PG&E: Step 6 – IOU Readiness • PG&E: Step – 8 Energization
Overlapping IOU & Customer Timelines	IOUs highlighted challenges with separating IOU and Customer time for overlapping steps • SDG&E and SCE did not attempt to reconcile double counting due to overlapping IOU and Customer steps • PG&E aggregated all time to the Customer during overlapping IOU and Customer steps
Concurrent IOU Step Timelines	IOUs noted potential for double counting days in aggregated timeline due to concurrent IOU-responsible steps • SDG&E and SCE did not note any attempt to reconcile double counting due to concurrent IOU-responsible steps • PG&E reported full timelines for each step, but reduced any concurrent days to 1 in the aggregated timelines

Overview of IOU Biannual Report Continued

The IOUs emphasized that their current reporting capabilities are insufficient to meet the granular reporting requirements set out in D.24-09-020

Narrative Topic	Details
Approach to ESJ	IOUs requested clarification on the definition of "Underserved Community" • PG&E defined "Underserved Community" using median household income and either statewide median income or low income threshold designated by the CA Department of Housing & Community Development SDG&E unable to track ESJ Community as information only available once the end-user has been identified by billing account
Approach to Outliers	IOUs addressed outliers but did not exclusively conform to definition in Decision, specifically negative datapoints or data two standard deviations above average • PG&E and SCE removed outliers from their reported projects • SDG&E did not remove outliers from their reported projects
Future Improvements	All IOUs acknowledged efforts to improve future reporting, including: • Salesforce enhancements • Process improvements • Granular tracking