

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

09/22/23

04:59 PM

A2305013

Application of SAN DIEGO GAS & ELECTRIC  
COMPANY (U 902-E) for Approval of its 2024  
Electric Procurement Revenue Requirement  
Forecasts, 2024 Electric Sales Forecast, and GHG-  
Related Forecasts

A.23-05-013

**JOINT REPORT RE MEET AND CONFER (RULE 13.9)**

Roger A. Cerda  
Senior Regulatory Counsel  
8330 Century Park Ct., CP32D  
San Diego, CA 92123  
Telephone: (858) 654-1781  
E-mail: rcerda@sdge.com

Kate Turner  
California Public Utilities Commission  
300 Capitol Mall, Suite 500  
Sacramento, CA 95814  
Telephone: (916) 823-4773  
Email: kate.turner@cpuc.ca.gov

Attorney for:  
SAN DIEGO GAS & ELECTRIC COMPANY

Attorney for  
THE PUBLIC ADVOCATES OFFICE AT THE  
CALIFORNIA PUBLIC UTILITIES COMMISSION

Jacob Schlesinger  
Tim Lindl  
Keyes & Fox LLP  
1580 Lincoln St., Suite 1105  
Denver, CO 80203  
Phone: (970) 531-2525  
E-mail: jschlesinger@keyesfox.com  
tlindl@keyesfox.com

Daniel W. Douglass  
Douglass, Liddell & Klatt  
5737 Kanan Road, #610  
Agoura Hills, CA 91301  
Telephone: (818) 961-3001  
Email: douglass@energyattorney.com

Attorneys for:  
SAN DIEGO COMMUNITY POWER  
AND CLEAN ENERGY ALLIANCE

Attorney for  
DIRECT ACCESS CUSTOMER COALITION

Evelyn Kahl  
California Community Choice Association  
One Concord Center  
2300 Clayton Road, Suite 1150  
Concord, CA 94520  
Telephone: (510) 980-9459  
Email: evelyn@cal-cca.org

Attorney for  
CALIFORNIA COMMUNITY CHOICE ASSOCIATION

September 22, 2023

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of SAN DIEGO GAS & ELECTRIC  
COMPANY (U 902-E) for Approval of its 2024  
Electric Procurement Revenue Requirement  
Forecasts, 2024 Electric Sales Forecast, and GHG-  
Related Forecasts

A.23-05-013

**JOINT REPORT RE MEET AND CONFER (RULE 13.9)**

Pursuant to Rule 13.9 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure and the Assigned Commissioner’s Scoping Memo and Ruling (dated August 4, 2023), San Diego Gas & Electric Company (SDG&E), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), San Diego Community Power (SDCP) and Clean Energy Alliance (CEA), Direct Access Customer Coalition (DACC), and California Community Choice Association (CalCCA) jointly file this report summarizing their meet and confer efforts and their position on the need for evidentiary hearings.<sup>1</sup>

**I. THE PARTIES’ MEET AND CONFER EFFORTS**

Rule 13.9(a) states that “no later than 10 calendar days after the submission of rebuttal testimony the parties must meet and confer, in person or via remote participation to consider the following:

- (1) Identifying and, if possible, informally resolving any anticipated motions;
- (2) Identifying the facts and issues in the case that are uncontested and may be the subject of stipulation;
- (3) Identifying the facts and issues in the case that are in dispute;

---

<sup>1</sup> Pursuant to Rule 1.8(d), counsel for SDG&E certifies that he has been fully authorized by Cal Advocates, SDCP, CEA, CalCCA and DACC to submit this joint report on their behalf.

- (4) Determining whether the contested issues in the case can be narrowed; and
- (5) Determining whether settlement is possible.”

In addition, the Scoping Memo requires the parties to include in their meet and confer report a statement as to whether evidentiary hearings are still needed. If the parties determine that hearings are needed, then the parties should identify the specific disputed issues of material fact, witness lists, and cross-examination estimates.<sup>2</sup>

On September 15, 2023, representatives of SDG&E, Cal Advocates, SDCP, CEA, CalCCA and DACC met and conferred to address the issues as required by Rule 13.9 and the Scoping Memo. The parties hereby summarize the results of their meet and confer efforts below.

**A. Identifying and, if possible, Informally Resolving any Anticipated Motions**

The parties do not anticipate filing any additional motions in this proceeding, other than (1) a joint motion to move their testimony and exhibits into the record, and (2) corresponding motions to seal the evidentiary record pursuant to Rule 11.5.

**B. Identifying the Facts and Issues in the Case that are Uncontested and May be the Subject of Stipulation**

Given that the October Update has yet to be submitted, the parties are unable to identify a final list of issues that are uncontested and may be the subject of stipulation. However, the parties will make every effort to identify the particular issues that remain contested/uncontested in their briefs and comments to the October Update.

**C. Identifying the Facts and Issues in the Case that are in Dispute**

There are no issues of material fact that remain in dispute in this proceeding that require evidentiary hearings. SDG&E, CCA Parties and DACC have agreed to request to move certain

---

<sup>2</sup> Scoping Memo, p. 5.

SDG&E discovery responses and other relevant exhibits into the record, which will obviate the need for a hearing on factual issues. These discovery responses and exhibits will be identified as exhibits in the joint motion described in section I(A) above.

As noted above, given that the October Update has yet to be submitted, the parties are unable to finalize the list of *non-factual* issues that remain in dispute at this time. However, the parties will make every effort to identify the particular issues that remain contested/uncontested in their briefs and comments to the October Update.

**D. Determining whether the Contested Issues in the case can be Narrowed**

Not applicable. See response to I.B and I.C above.

**E. Determining whether Settlement is Possible**

Given that the October Update has yet to be submitted, the parties believe settlement discussions are premature at this juncture.

**II. THERE IS NO NEED FOR EVIDENTIARY HEARINGS**

As noted in Section I above, there are no material issues of fact in dispute that require evidentiary hearings and thus the parties agree that evidentiary hearings are not necessary in this proceeding. Since evidentiary hearings are not necessary, the parties propose the following procedural mechanism for submitting testimony and other exhibits into the evidentiary record. On or before September 29, 2023, the parties will submit a joint motion to enter testimony and exhibits into the evidentiary record, which would include the proposed exhibit list with the appropriate exhibit designations. The parties expect that they will be able stipulate to the admission of most if not all the exhibits. This would allow the parties to reference the proposed exhibits numbers set forth in the exhibit list in their respective briefs as necessary. If the parties are unable to stipulate to the admission of an exhibit(s), the joint motion will identify that exhibit(s) along with the offering parties' proffer and the objecting parties' position.

### III. CONCLUSION

This concludes the parties' joint report on meet and confer efforts. The parties appreciate the Commission's time and effort in resolving this proceeding in an efficient manner.

Respectfully submitted,

*/s/ Roger A. Cerda*

Roger A. Cerda

8330 Century Park Ct.

San Diego, CA 92123

Telephone: (858) 654-1781

Facsimile: (619) 699-5027

E-mail: rcerda@sdge.com

Attorney for:

SAN DIEGO GAS & ELECTRIC COMPANY

September 22, 2023