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May 8, 2026

Mr. Drew Bohan
Executive Director
California Energy Commission
715 P Street
Sacramento, CA 95814

SUBJECT: SDG&E Load Management Standards 2026 Annual Report

Dear Director Bohan:

On behalf of San Diego Gas & Electric Company (SDG&E), please find attached our 2026 Annual Report for the Load Management Standards. Title 20 of the California Code of Regulations Section 1621(d) states:

(4) Large IOUs shall submit to the Executive Director annual reports demonstrating their implementation of plans approved pursuant to this section. The reports shall be submitted one year after plans are approved pursuant to subsection (2) and annually thereafter.

The California Energy Commission approved SDG&E's Load Management Standards Compliance Plan at its May 8, 2025, Business Meeting,¹ establishing May 8 of each year as the annual deadline for submitting a report providing an implementation update. Accordingly, SDG&E submits its annual report as an attachment hereto.

Please contact me with any questions you or your staff may have about the information provided in this report.

Sincerely,

A handwritten signature in blue ink that reads "Sarah M. Taheri".

Sarah M. Taheri
Regulatory Affairs Manager

Attachment: SDG&E Load Management Standards 2026 Annual Report

¹ CEC Approved Order No. 25-0508-05a Approval of Load Management Standards Compliance Plans for PG&E, SCE and SDG&E; adopted at the May 8, 2025, CEC Business Meeting.

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1) Implementation status of rates or programs in the approved compliance plan.

- a) For rates or programs under implementation, provide information of the key milestones and major accomplishments. Reference the approved compliance plan for timeline and milestones adherence.

SDG&E Response: SDG&E is including the timeline from SDG&E’s approved Compliance Plan without any changes but with an additional column explaining the status of key milestones and updates. Overall, SDG&E’s implementation status was governed by the issuance of the CPUC’s Decision in the DFOIR Track B. That decision was delayed a year which therefore pushed SDG&E’s timeline out.

Approved Compliance Plan as of March 2025 (No changes) ²			2026 Annual Update
Date	Action	Assumptions/Notes	Milestone Status/Updates
Q3 2024	Proposed Decision on DFOIR Track B.	Assumption based on R.22-05-007, April 24 Ruling at Attachment A, which states that a PD is expected in Q3 or Q4 2024.	Delayed. 7/25/2025 Proposed Decision issued.
Q4 2024	Final Decision released, considered at CPUC Voting Meeting	Assumes a final decision is voted out in Q4 2024. CPUC voting meetings are 10/17, 11/7, 12/5 and 12/19. ³	Delayed. 8/28/2025 D.25-08-049 is approved by the CPUC.
Q1 2025	SDG&E submits RTP application to CPUC	This assumes a final decision in Q4 2024. Pursuant to D.23-11-006, SDG&E has 90 days to file its RTP application.	Delayed. 2/2/2026 SDG&E files A.26-02-001 with an expected supplemental filing scheduled for June 1, 2026.
Q1 2026	CPUC approval of SDG&E’s RTP application	Assumes a final decision on SDG&E’s application approximately 1 year from filing. The length of CPUC proceedings varies due to various circumstances, but SDG&E is estimating a one-year proceeding.	Delayed. Expected Q2 or Q3 2027 pursuant to the 4/30/2026 Assigned Commissioner’s Scoping Memo and Ruling in A.26-02-001.
Q2/Q3 2026	SDG&E will consider and plans to apply to FERC for time-varying transmission energy rates provided that SDG&E determines that they are cost-effective, technologically feasible, and will not result in hardship. Considerations will include FERC’s exclusive jurisdiction over transmission-rate design, disposition of similar applications	SDG&E will make this determination a reasonable amount of time after the relevant, above-referenced CPUC final decision in Track B of R.22-07-005, but not to exceed six months. The approval of FERC for SDG&E’s time-varying transmission rate would be needed, subject to FERC’s processes and procedural timelines.	Delayed. Expected Q4 2027.

² SDG&E Compliance Plan at 1-2.

³ California Public Utilities Commission website, [2024 Voting Meetings \(ca.gov\)](https://www.cpuc.ca.gov), viewed 5/2/2024.

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	submitted by other utilities, and prudent use of ratepayer funds to support exploration of time-varying transmission rates.		
Q1 2027	SDG&E RTP rates go live	Timeline from approval of RTP application to go-live for rate is approximately one year. This period includes requirements gathering, planning, development, and testing.	Delayed. Expected Q1 - Q3 2028. SDG&E is expecting ten months from approval of RTP to the go-live rate ⁴ however, that assumes SDG&E's rate design, as proposed, is approved. This timeline may change depending on details in a final CPUC decision, including the final rate design and other potential requirements.

- b) For active LMS compliant rates or programs, provide key details, including
- (i) Name
 - (ii) Type (rate or program)
 - (iii) Customer class
 - (iv) Brief description, including, but not limited to signal type, participating end uses, and incentive structure

SDG&E Response: SDG&E has no active LMS compliant rates.

- c) Discuss material deviation relative to the approved compliance plan, if any:
- (i) Summary of the deviation

SDG&E Response: As stated in 1.a) above the main cause of the deviation is due to the delay in the DFOIR Track B decision. This not only impacted the timeline but also the rate design and implementation that will no longer be based off of SDG&E's original application, A.21-12-006, and will now be based off of SDG&E's new application, A.26-02-001, that complies with the CPUC's DFOIR Track B guidance decision.⁵

- (ii) Reason for the deviation

⁴ See A.26-02-001, Chapter 5 Implementation at 9.

⁵ D.25-08-049.

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SDG&E Response: SDG&E's rate approving body, the CPUC, had an approximate 1 year delay in issuing the decision that provides guidance on SDG&E's application for LMS compliant dynamic rates. Additionally, the CPUC guidance decision (D.25-08-049) required rate design with more design elements and more complexity than expected by SDG&E, which further required a delay in SDG&E's timeline to file its application.⁶

- (iii) Projected impact of such deviation on compliance of the LMS regulations

SDG&E Response:

As stated in 1.a) above, the approximate one-year delay in the CPUC guidance decision resulted in a cascading effect to the rest of the timeline by approximately one year. Additionally, the CPUC's proposed schedule for rate application A.26-02-001 exceeds the one-year estimated schedule included in SDG&E's approved compliance plan. The Assigned Commissioner's Scoping Memo and Ruling includes a schedule with a final decision issued up to 18 months after the filing date. Thus, the Scoping Memo schedule adds six months to SDG&E's anticipated schedule; however, the 18-month schedule better aligns with the more complex rate design required in CPUC D.25-08-049. Accordingly, between the year delay in filing the application and the six months of additional time in the schedule for approval of the application, SDG&E expects its implementation of the rate to be approximately 1.5 years beyond the January 1, 2027 LMS rate implementation deadline.

2) Time-varying rate submission to MIDAS

Confirm that time-varying rates are being uploaded to the Market Informed Demand Automation Server (MIDAS) per approved compliance plan.

- a) Provide a list of Rate Identification numbers (RINs) and the following key details:
 - (i) Applicable tariff and rate modifiers
 - (ii) Customer class

⁶ R.22-05-007, at Attachment A.

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SDG&E Response: A list of RINs will be provided to CEC along with this report.

- b) Rate Modifier Exclusion: if your approved compliance plan includes a plan to exclude certain non-time-dependent modifiers, provide information to demonstrate that:
- (i) Each modifier excluded represents less than 0.5% of the total number of customers served by the utility AND less than 0.5% of total annual load as sales, or
 - (ii) Each modifier excluded is less than 0.01 \$/kWh for additive modifiers OR 2% for ratio modifiers.

SDG&E Response: A list of rate modifier exclusions will be provided to CEC along with this report.

3) RIN(s) on customer billing statements

Confirm that RIN(s) are provided on customer billing statements and online account using both text and QR Code. Confirm that both RINs from the IOU and the CCA are available for unbundled customers.

SDG&E Response: SDG&E confirms that RIN(s) are provided on customer billing statements and online accounts using both text and QR Code. SDG&E also confirms that CCAs are able to submit RINs for unbundled customers. SDG&E does not confirm that CCAs are providing RINs, only that SDG&E will include the CCA RIN information on the bill if it is provided by the CCA.

4) Address compliance with any conditions in the order approving the regulated entity's compliance plan.

SDG&E Response: SDG&E has been and will continue to be an active participant in the planning and development of the Single Statewide Tool, or RIN access tool. The CEC set an initial deadline of May 8th, 2026,⁷ which was subsequently extended to May 8th, 2029.⁸

⁷ Signed Orders Approving LMS Compliance Plans for PG&E, SCE, SDG&E, VCE, SJCE, and PCE from the May 8, 2025 Business Meeting at 4.

⁸ CEC, March 12, 2026 Business Meeting backup materials at 6.