

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

Application of Southern California Edison
Company (U 338-E) to Establish Marginal
Costs Allocate Revenues, And Design Rates.

Application 08-03-002
(Filed March 4, 2008)

In the Matter of the Application of Southern
California Edison Company (U 338-E) for
Authority to Make Various Electric Rate Design
Changes.

Application 07-12-020
(Filed December 21, 2007)

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ACR
REGARDING REVISED SCHEDULE FOR 2009 RATE DESIGN WINDOW
APPLICATION**

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Dated: **June 16, 2009**

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Southern California Edison Company (SCE) hereby provides comments in accordance with the June 6, 2009 “Assigned Commissioner’s Ruling Requesting Comments on Revising Date for Southern California Edison Company to File Its 2009 Rate Design Window Application” (hereinafter, “June 6 ACR”).

The June 6 ACR solicits comments to consider “delaying” the schedule for filing SCE’s 2009 Rate Design Window (RDW) application from December 2009 until September 1, 2010, with new dynamic pricing rates effective on January 1, 2012¹ rather than October 1, 2012 when they would be implemented if such proposals were considered in the normal course of Phase 2 of SCE’s 2012 General Rate Case (GRC). Previously, a March 4, 2009 “Assigned Commissioner’s Ruling Requesting Comments on Schedule to Design and Adopt Dynamic Pricing Rates for Southern California Edison Company” (hereinafter, “March 4 ACR”) stated that “a plan should be established to ensure that SCE has dynamic pricing proposals for all customer classes when it files

¹ June 6 ACR, p. 2.

its 2012 General Rate Case Phase 2 Application.”² One of the questions raised in the March 4 ACR was whether SCE should propose additional dynamic pricing rates for certain customer classes prior to its 2012 GRC Phase 2 Application.³

In Decision (D.) 08-07-045, the Commission found that “rate design proceedings are the appropriate forum to address dynamic pricing” and that such proposals should be made in a “comprehensive rate design proceeding or other appropriate proceeding if directed by the Commission.”⁴ However, the Commission directed Pacific Gas and Electric Company (PG&E) to file dynamic pricing proposals in its 2008 RDW application⁵ with a revised application date and effective dates from the adopted procedures for RDW applications set forth in D.89-01-040. Moreover, the Commission directed PG&E to file optional real-time pricing rates for all customer classes as part of Phase 2 of PG&E’s 2011 GRC on March 11, 2010, and a default critical peak pricing (CPP) rate for residential customers 30 days after any change in law that could allow default or mandatory time-variant rates for residential customers.⁶

SCE’s recommendation in response to the March 4 ACR was to file additional dynamic pricing proposals in Phase 2 of SCE’s 2012 GRC for the following reasons:

(1) The proposed settlement agreements in this proceeding include rate designs and options that meet, in large part, the default dynamic pricing objectives set forth in D.08-07-045,

(2) The balance of the dynamic pricing objectives established in D.08-07-045 should be achieved in SCE’s next “comprehensive rate design proceeding,” which is Phase 2 of SCE’s 2012 GRC,

(3) Parties should be allowed to rely on the rate design proposals reflected in the proposed settlement agreements for a full three-year period, which extends through October 1, 2012, and

² March 4 ACR, p. 2.

³ SCE noted that with only a few exceptions, the proposed settlement agreements in this proceeding already provide dynamic pricing options that will be available for most of SCE’s customers by October 1, 2009, although CPP rates are generally not the default tariff. The settlement agreements provide a default peak time rebate (PTR) for residential customers, default critical peak pricing (CPP) and mandatory time-of-use (TOU) for large (> 200 kW) commercial customers, and optional CPP or real time pricing (RTP) for each rate group to be implemented on October 1, 2009.

⁴ D.08-07-045, Findings of Fact 4, 5, p. 89.

⁵ D.08-07-045, Ordering Paragraph 6, p. 98.

⁶ D.08-07-045, Ordering Paragraphs 7 and 8, p. 99.

(4) SCE's three-year 2009 GRC cycle, which coincides with the installation period for advanced meters for both residential and small commercial customers, is best used as a transition period where operational and customer educational objectives are achieved.⁷

DRA also filed comments in response to the March 4 ACR, concluding that:

[I]t would make sense to wait for SCE's 2012 General Rate Case Phase II Application to offer additional dynamic pricing options. That would allow SCE sufficient time to develop complete, well reasoned proposals that include comprehensive bill impact evaluations based on actual customer billing data.

DRA also cited the need to allow SCE time to devote to customer education in order to minimize customer frustration and complaints and to account for the deployment schedule for SCE's advanced metering infrastructure for residential and other customers.⁸

SCE's response to the March 4 ACR also illustrated how the schedule adopted for SCE's RDW applications⁹ provided inadequate opportunity to make additional dynamic pricing proposals before Phase 2 of SCE's next GRC. While the June 6 ACR refers to a "delay" to SCE's 2009 RDW application,¹⁰ SCE has only rarely filed an RDW application due to the discretionary nature of such applications and has never filed an RDW application that would have a significant impact on so many customers.

If the Commission decides to follow the path set forth in the June 6 ACR, then it should direct SCE to file an application on September 1, 2010 in order to implement additional dynamic pricing options by January 1, 2012. Regardless of whether this application is characterized as an SCE 2009 RDW application, as suggested in the June 6 ACR, or otherwise, the schedule and scope of the dynamic pricing proceeding will differ markedly from an RDW application, which is a discretionary application designed to handle in an expeditious manner relatively noncontroversial rate design issues that do not prompt widespread participation. As demonstrated in PG&E's current dynamic pricing proceeding, A.09-02-022, DRA and a large number of customer groups are

⁷ The current SCE SmartConnect deployment schedule results in less than 20 percent of SCE's customers having a year's worth of interval data by June 2011.

⁸ DRA Comments on March 4 ACR, p. 2.

⁹ D.89-01-040.

¹⁰ June 6 ACR, p. 2.

actively involved in issues such as PG&E's ability to recover revenues for its incremental expenditures required to implement dynamic pricing options,¹¹ the timing of implementation of dynamic pricing for certain customer groups, public participation hearings, discovery, development of testimony, and evidentiary hearings.

The Commission has also directed each utility to submit real-time pricing (RTP) tariffs in its first "comprehensive rate design proceeding," following the California Independent System Operator's (CAISO) implementation of its market redesign and technology upgrade (MRTU) and after gaining some experience with MRTU.¹² In the event the Commission does decide to direct SCE to file a dynamic pricing rate design application on September 1, 2010, the Commission should also clarify whether SCE would be required to include optional RTP proposals for all rate groups in this "2009 RDW application," or whether they should be considered in Phase 2 of SCE's 2012 GRC.

Respectfully submitted,

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June 16, 2009

¹¹ In A.09-09-022, there is a pending proposed interim decision regarding PG&E's request for rate relief for certain expenses related to implementation of dynamic pricing options in accordance with the expedited schedule adopted in D.08-07-045.

¹² D.08-07-045, p. 7, citing D.05-11-009, p. 7; D.08-07-045, p. 18. The Commission deferred consideration of optional RTP rates for PG&E from its 2008 RDW application until Phase 2 of its 2011 GRC.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of the COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ACR REGARDING REVISED SCHEDULE FOR 2009 RATE DESIGN WINDOW APPLICATION on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **16TH day of June, 2009**, at Rosemead, California.

/s/ CHRISTINE SANCHEZ

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