Prepared Intervenor Testimony of
Southern California Edison Company

Before the
Public Utilities Commission of the State of California

Rosemead, California
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I.

INTRODUCTION

The Southern California Gas Company (SCG) and San Diego Gas and Electric Company (SDG&E) (collectively, SCG/SDG&E) 2020 Triennial Cost Allocation (TCAP) Application (Application) proposes to eliminate the unbundled storage program while maintaining the amount of storage available to its core customers. This proposal is problematic because (1) the cost and storage allocation is arbitrarily based upon unsupported assumptions, and (2) the proposal does not provide sufficient operational services to electric generation customers to effectively manage unavoidable operational imbalances, which is not appropriate since energy storage capacity is not being made available to noncore customers to manage their own operational imbalances.

If the California Public Utilities Commission (CPUC or Commission) approves the Application’s storage allocation proposal, it should ensure there are cost effective solutions for power generators to manage daily imbalances. To that end, if the Commission approves the storage allocation, SCE recommends that the Commission (1) initiate an Order Instituting Rulemaking (OIR) to develop a full requirements cost-based gas supply tariff to allow CAISO-interconnected electric generators the option of buying gas directly from SCG/SDG&E, and (2) eliminate any perverse incentive in the Gas Cost Incentive Mechanism (GCIM) that would allow SCG/SDG&E shareholders to benefit from providing load balancing services when SCG/SD&E issues an Operational Flow Order (OFO) or Emergency Flow Order (EFO).

In addition, the Commission should deny the Application’s proposal to allocate Self Generation Incentive Program (SGIP) revenues to a group of customers that are ineligible under the Commission’s Resolution E-4926 to receive such revenues. If adopted, the Application’s proposal in this regard will result in a 20% increase to the applicable transmission rate. The Commission’s final decision should therefore deny or modify the Application’s proposed SGIP revenue allocation.
II.

THE APPLICATION’S STORAGE ALLOCATION PROPOSAL IS UNREASONABLE UNLESS MODIFIED

A. The Proposed Storage Allocation is Arbitrary and Unsupported

The Application’s storage allocation is predicated upon the unsupported and overstated assumption that the Aliso Canyon gas storage facility total inventory is 119.5 Bcf with access to the full 68.6 Bcf of capacity authorized by the California Department of Conservation Division of Oil, Gas, and Geothermal Resources (DOGGR). This is an unreasonable assumption that is ungrounded from fact or practicality. The facts are that the maximum gas storage inventory in the SCG/SDG&E system is only 84.9 Bcf because the CPUC has imposed a cap on Aliso Canyon inventory of 34 Bcf (i.e., the 119.5 Bcf amount needs to be reduced by the inventory limitation at Aliso Canyon). The Commission’s Order Instituting Investigation (OII) to determine the feasibility of minimizing or eliminating the use of Aliso Canyon will not meaningfully begin to address whether it should make upward or downward adjustments to these restraints until August 2020 when the Commission’s staff will issue a report, followed by a prehearing conference to set dates for the remainder of the proceeding. It is unlikely the Commission will issue any decision in that proceeding until at least 2021. This TCAP covers 2020 through 2022. Thus, the practical reality is that the Application overstates the available storage assets by 34 Bcf for at least the majority, if not all, of the years covered by this TCAP. Given the facts and

2 Id. at p. 3:16.
3 Id. at pp. 3:13 (stating the maximum for SCG is 119.5), 3:16 (stating Aliso Canyon could make up 68.6 Bcf but Aliso Canyon is currently limited to 34 Bcf). Using these numbers the currently available gas storage is (119.5 Bcf – 68.6 Bcf + 34 Bcf = 84.5 Bcf).
5 I.17-02-003 Phase 2 Scoping Memo and Ruling at p. 5.
practical realities, the proposed storage allocation is arbitrary and unreasonable, and should be revised to reflect the current available storage capacity on the SCG system (i.e., the 84.5 Bcf).

B. The Proposal to Eliminate Unbundled Storage is Unreasonable Unless the Commission Ensures Cost Effective Solutions for Electric Generators to Manage Daily Imbalances

The Application proposes to (1) eliminate the unbundled storage program, to which 47.1 Bcf is currently assigned (but actually not available to noncore customers because of Aliso Canyon constraints); (2) effectively maintain the core storage allocation; (3) increase summer core injection from 388 MMcfd to 445 MMcfd; (4) increase the amount of gas storage allocated to load balancing from 8 Bcf to 16 Bcf; and (5) reclassify the 21 Bcf from the unbundled gas storage program to a new reliability function that would act as cushion gas. The Application’s proposal thus eliminates the ability of noncore customer to procure storage capacity to support their load balancing requirements. As discussed in greater detail below, the Commission should not approve the proposal to eliminate the unbundled storage program without replacing it with other cost-effective options for electric generators to manage imbalances. The Commission should also eliminate any perverse incentive in the GCIM that allows SCG/SDG&E shareholders to benefit from providing load balancing services when SCG/SD&E issues an OFO or EFO.

1. Relevant Background

Between the 2016 TCAP and the 2020 TCAP, SCG/SDG&E system conditions and operations have changed dramatically. The Aliso Canyon operating restrictions have reduced the amount of available storage and the withdrawal rate due to the operating limitations of using only tubing within the storage wells. As a result, there has been a dramatic increase in the amount and frequency of OFOs. To address the impact of these restrictions on daily operations, SCG/SDG&E and their customers entered into a series of settlement agreements\(^7\) that revised the high OFO procedures and tightened the daily

\(^6\) It proposes to slightly reduce core’s storage allocation from 83 Bcf to 82.5 Bcf.

\(^7\) Prepared Direct Testimony of Michelle Dandridge on behalf of Southern California Gas Company and San Diego Gas & Electric Company, July 2018, at p. 6.

\(^8\) D.16-06-021, D. 16-12-015, D. 17-03-020, D. 17-11-021, and D. 18-11-009
tolerance from +/- 25% to 5%, creating a narrower margin of forecast error for all shippers. Due to the higher frequency of OFOs, the number of days on which shippers must seek load balancing options to address forecast error has also increased.

Along with the OFO procedures, a new gas curtailment program was approved in Decision 16-07-008, which established that electric generation would be the first load curtailed regardless of the cause of a gas shortage. While curtailing gas used for power generation can be done safely and without interrupting gas or electric service, it raises the cost of electricity for electric customers during gas curtailment events.² Prior to the operating restrictions imposed on Aliso Canyon, the curtailment of gas plants was very limited. SCE understands that SCG/SDG&E did not have a system curtailment for nearly 20 years between 1991 and 2011. By contrast, between September 1, 2018 and March 31, 2019, power generation was affected by a curtailment on 35 days. Six of those days were due to required curtailments and 29 were due to voluntary curtailments during which gas service to power generation was curtailed on many of the coldest days.

Gas system constraints were not only caused by the reduced operations at Aliso Canyon. SCG/SDG&E’s gas transmission system has also been operating at reduced throughput capacity due to operating and maintenance issues affecting Lines 235, 4000, and 3000.¹⁰ The lowered throughputs at some of SCG’s backbone pipelines has caused gas prices in southern California to be much higher than gas prices in the Pacific Gas and Electric Company (PG&E) territory. For example, on July 24, 2018, the price of gas at the SoCal citygate was $39.31 per MMbtu, while a MMbtu of gas only cost $3.14 at the PG&E citygate.¹¹ The storage and transmission system constraints caused gas prices on July 24, 2018 to be more than ten times higher in Southern California than in Northern California, even though

² Because some economic gas generation was shut down, resources lower on the dispatch list had to be dispatched.


¹¹ See Joint PFM to Modify the OFO Rules, Declaration of Rob Grimm, Table 3 at p. 13.
both systems access gas from the same interstate pipeline systems. SCE therefore petitioned the Commission to modify the OFO rules to reduce the impact of OFO driven price spikes on power prices in the future.12

2. Giving SCG/SDG&E Virtually Exclusive Use of Gas Storage Eliminates Cost Effective Load Balancing Options for Power Generators, Creating the Risk that SCG/SDG&E and Certain Marketers Will Be Able to Set the Price of Gas at any Rate the Market Will Bear, Thereby Harming Electric End-Use Customers

The Application’s Proposal would essentially give SCG/SDG&E total market power over gas storage. If granted, the Application will eliminate electric generators’ ability to secure cost effective solutions for storage to manage daily imbalances existed. This could create the opportunity for SCG/SDG&E and market participants with firm backbone service to set the price of citygate gas at whatever rate the market will bear, which will harm electric end-use customers.

In the 2016 TCAP, core was allocated approximately 60% of the storage inventory, load balancing was allocated approximately 6%, and the unbundled storage/hub services was allocated 34% of the gas storage inventory. Although SCE would have preferred to have had more gas storage allocated to the unbundled program, noncore shippers at least had an opportunity to purchase up to one third of the available gas storage inventory. The opportunity to for noncore customers to access gas storage expanded the amount of market participants, creating liquidity that helped mitigate the risk of consolidation of market power over gas storage in any one entity. The Application’s storage allocation proposal will provide SCG/SDG&E with virtually exclusive market power over the operation of gas storage.13

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12 See Joint PFM to Modify the OFO Rules.
13 Prepared Direct Testimony of Michelle Dandridge on behalf of Southern California Gas Company and San Diego Gas & Electric Company, July 2018, at p. 8, Table 1 (proposing to allocate approximately 2% of gas storage inventory to wholesale core customers, with SCG/SDG&E controlling the remaining 98%. Other than the gas storage that SCG/SDG&E are required to offer to wholesale customers and Core Transportation Agents (CTAs), all of the available gas storage inventory will be under SCG/SDG&E’s control.)
SCE understands that SCG/SDG&E is grappling with operating restrictions, but the fact remains that forecasting gas use from a power generation customer is prone to significant forecast error. Power generators, like all other customers, nominate their day ahead gas in Cycles 1 and 2. Cycle 2 nominations are due by 4:00 PM Pacific Clock Time (PCT), while SCG/SDG&E has until 8:00 PM PCT to call a low OFO for the following day. After Cycles 1 and 2, the remaining cycles occur during the gas day and provide very little ability to revise gas quantities. This schedule is problematic when a strained system, such as SCG/SDG&E’s, lacks slack capacity. Backbone rights to get gas from the receipt point into the SCG/SDG&E gas transmission system to the citygate are often unavailable.

In addition, gas is purchased on a daily basis, i.e., in 24 hour blocks, with the assumption that it will be delivered on a ratable basis, meaning 1/24 of the daily gas purchase is delivered to SCG/SDG&E’s gas system each hour. This process is more complicated when gas is purchased during the flow day because there are less than 24 hours remaining in the day. For example, if there are only 12 hours left in the day, a purchase of 25,000 MMbtu would require SCG/SDG&E to transport gas at a rate of 50,000 MMbtu/d for 12 hours to deliver a total of 25,000 MMbtu. Shippers that need to increase the amount of flowing gas to meet demand during the day would need additional capacity to ensure its gas receipts are delivered in a constrained gas system. However, all or most of the available backbone capacity is likely already being used based of previous nominations. As a result, without unbundled storage, electric generators’ cost-effective options for managing imbalances are eliminated and they must then factor the potential cost of OFO penalties into their CAISO energy bids, thereby significantly increasing the cost of electricity to SCE’s end-used customers. Indeed, SCE’s 2018 ERRA balancing account was approximately $815 million undercollected as a result of much higher power prices than originally forecast because of the adverse impact that OFO penalty pricing had on CAISO power prices.

Load balancing is important to power generators because the integrated nature of a power system and the varied real-time electric generation, which must account for system changes, makes it difficult to accurately forecast the gas demand to specific generation units. Power generators are necessarily subject to certain levels of forecast error that cannot be planned because the cause of their dispatch is often out of their control. For example, by 8:00 am, SCE needs to forecast its day ahead gas demand
and purchase sufficient quantities of gas based on an estimate of how much CAISO connected
generators in SCE’s portfolio may be dispatched. SCE submits its day-ahead bids into the CAISO
Integrated Forward Market by 10:00 a.m. and receives its day ahead dispatch instructions by 1:00 pm.
To the extent SCE’s forecast did not match its scheduled commitments from the CAISO market, a
forecast error occurs. Then in real-time, as the electric systems conditions change, (e.g. load increases
or decreases, electric generation forced outages, transmission outages), CAISO will re-dispatch
generation resources to balance the system. These real-time adjustments also contribute to the forecast
error. In addition to forecast errors, power generation dispatch changes may be made because one or
more units may have a forced outage that causes the resource to reduce all or part of its output. When
one unit goes down, another is likely dispatched to replace the lost output. In that event, both units have
forecast error because neither likely forecasted that a forced outage would occur.

Currently, electric generators balance load by either trading gas that is already flowing on the
system or using gas storage. If electric generators have an imbalance during an OFO, customers may
seek to trade imbalances if a customer with too much gas can sell its excess gas to a customer that needs
more gas. However, an OFO is called when SCG/SDG&E believes that the entire gas system is forecast
to have too much or too little gas. Thus, when SCG/SDG&E calls a low OFO, customers who are short
gas will look to purchase imbalance gas from holders of gas storage.

The Application proposes to allow shippers to purchase imbalance gas from essentially one
company, SCG/SDG&E. In the previous TCAP allocation, approximately one third of the gas storage
was available to parties to purchase directly by trading with another party. The Application proposes to
eliminate that opportunity. The Application’s proposal to increase gas storage inventory by 8 Bcf is
misleading because that increase is unlikely to provide meaningful relief in many instances given that
the Application does not propose to add new firm injection rights or change noncore balancing
tolerances. The proposed allocation for load balancing remains unchanged at 345 MMcfd. In fact, with
regard to the winter, the Application proposes to reduce firm withdrawal for load balancing from 525
MMcfd to 400 MMcfd. It would increase it from 525 MMcfd to 840 MMcfd during the summer
months. Overall, the Application increased load balancing inventory, but not the ability to use that
inventory by injecting gas into storage or by withdrawing gas from storage. As noted above, SCE’s customers experienced significant cost increases due to SCG/SDG&E’s issuance of OFOs in the summer of 2018 under the constrained operating conditions on its system. Eliminating the unbundled gas storage program will force shippers to rely on the only holder of firm capacity rights, SCG/SDG&E Gas Acquisition Department (GAD), for load balancing which is effectively a monopoly service without a cost-based rate structure.¹⁴

3. The Commission Should Initiate an OIR To Create an Opt-in Gas Supply Tariff for Power Generation

SCE is sympathetic to the difficulties SCG/SDG&E is experiencing with its system that are driving the storage allocation proposal. SCE, however, must advocate for the interests of its five million customers who have already suffered nearly $1 billion more than the average historical cost of power due to the constraints on SCG/SDG&E’s system. Accordingly, SCE respectfully requests that the Commission initiate an OIR to implement an optional full requirements, cost-based gas tariff for electric generation customers.

Such a tariff would allow SCG/SDG&E to work with the electric reliability coordinators to assure that gas supplies needed for power generation are available on a cost-of-service basis. Having a full requirements, cost-based tariff would also put the load balancing requirement for power generation in the hands of SCG/SDG&E – in conjunction with the electric system control areas (e.g., CAISO) -- and would mitigate SCE’s concern about effects of citygate market power on gas prices because CAISO-interconnected electric generators would no longer need to rely on non-tariff based balancing service charges, which have recently led to extremely high citygate prices and associated cost increases in the CAISO power markets. As a simple example, an electric generator with a 10,000 Btu/kWh

¹⁴ GAD’s relationship with core customers is influenced by the GCIM. The GCIM gives shareholders an opportunity to share in up to 25 percent of savings from gas purchased below a benchmark. One way to create an opportunity to procure gas below the benchmark is to have the gas system operator declare an OFO and then have GAD offer balancing service at attractive rates that contribute to shareholder awards. Thus, there is an inherent conflict of interest and potentially a subconscious incentive to use these rights to earn extra shareholder awards. That is particularly the case when an entity with market power controls both the ability to call and OFO and earn unregulated profits from the declaration.
heatrate would need to bid at least $300/MWh if it was confronted with the potential for a $30/MMBtu
gas supply cost comprised of $5/MMBtu for the commodity and $25/MMBtu for the OFO imbalance
penalty, with no ability to increase its access to natural gas supply because of the SoCalGas system
constraints. If this illustrative generator is awarded by the CAISO, the hourly market price for power for
all customers would be at least $300/MWh (or more if a similarly situated, but higher-cost generator, set
the market price). Thus, only a small amount penalty-exposed gas exposure from an electric generator
can set extremely high market prices for all CAISO electric customers. This gas penalty amplification
impact on CAISO prices resulted in SCE’s 2018 ERRA balancing account being undercollected by
approximately $815 million, and it is imperative the Commission take immediate action to implement
cost-based gas procurement tariff service for electric generators to avoid continued economic harm to
CAISO-connected electric retail customers.

An opt-in full service, cost-based tariff for electric generation is also timely because the way the
state uses gas-fired generation (GFG) is changing as the state works toward achieving its greenhouse gas
(GHG) reduction goals. While the percentage of GFG will be reduced as more of California’s power
comes from non-GHG emitting sources, the state will continue to depend upon GFG to integrate
renewables and to provide necessary generation during periods of weather-related events that reduce
renewables deliveries. It is therefore imperative electric generators be able to access cost-based gas
commodity service from SCG/SDG&E so that required electric generation services can be made
available to the CAISO without reliability and adverse cost impacts on retail electric customers.

4. **If the Commission Grants the Proposed Storage Allocation, it Should Eliminate any
   Perverse Incentives in the GCIM that would allow SCG/SDG&E Shareholders to
   Benefit from Providing Load Balancing Services when SCG/SDG&E Issues OFOs and EFOs**

If the Commission does not initiate the above described OIR, it should at least not allow any
appearance that SCG/SDG&E is able to use its market power to earn profits from non-tariff services.
SCE believes that the Commission could avoid any appearance of SCG/SDG&E using its exclusive gas
storage market power to earn profits from non-tariff services if SCG/SDG&E were prohibited from
posting any shareholder awards from any profits earned buying or selling gas on a day when an OFO, EFO, voluntary gas curtailment, or gas curtailment is in effect. This exemption should only prohibit positive shareholder earnings from the sale of non-tariffed services during OFO, EFO, voluntary gas curtailment, or gas curtailment event is in effect; other features of the GCIM would be unaffected.
III.

THE COMMISSION SHOULD REJECT SOCALGAS/SDG&E’S SGIP REVENUE ALLOCATION PROPOSAL

A. Allocation of SGIP Revenues

The Application proposes to allocate SGIP revenues to five broad categories of customers roughly distinguished by the type of end use (i.e., residential, C&I, generation), and the level of service provided (i.e., core or noncore) on the basis of customer participation. While this level of categorization is sufficient for allocating natural gas costs and setting rates for natural gas service, it does not sufficiently define customers for the purpose of SGIP revenues because the broad category of noncore electric generation (EG) customers includes transportation level (TLS) customers who are ineligible to participate in SGIP. The Commission should not adopt this revenue allocation because it is not consistent with the Commission’s Resolution E-4926 and will result in a 20% increase to the applicable transmission rate.

Resolution E-4926 requires each investor-owned utility (IOU) to “allocate costs on the basis of the actual percentage allocation of funds resulting from the disbursement of program incentives over the previous three years in its service territory.”\(^{15}\) To satisfy this requirement, SCG/SDG&E must allocate a percentage of the SGIP revenues only to the customer classes that are eligible to participate in SGIP. SCG/SDG&E’s Application broadly proposes to allocate SGIP revenue to noncore EG customers, which is a class of customers that includes TLS customers. TLS customers, however, are not eligible to participate in SGIP.

TLS customers are comprised of municipal electric utilities, independent power producers, IOUs, and other gas customers who receive gas service at the transmission level, and participate in the wholesale electricity markets. The majority, if not all,\(^{16}\) of SCG/SDG&E’s TLS customers are

\(^{15}\) Resolution 4926 Finding 8, at p. 18, Ordering Paragraph 3(a).
\(^{16}\) SCG/SDG&E Response to SCGC Data Request 9.2.
prohibited from participating in the SGIP program.\textsuperscript{17} In fact, not a single TLS customer has participated in the program since its inception in 2001.\textsuperscript{18}

The Commission’s final decision should deny or modify the Application’s proposed SGIP revenue allocation so that SGIP revenue is only allocated to eligible customer classes. Given the TLS customer class is separately identified for rate setting purposes, SCG/SDG&E can separate TLS for the purpose of allocating SGIP revenues.

\textsuperscript{17} SGIP Handbook paragraph 6.4.5, at p. 66 (describing the following category as ineligible: “Publicly-owned or investor-owned gas, electricity distribution utilities or any electrical corporation (ref. Public Utility Code 218) that generates or purchases electricity or natural gas for wholesale or retail sales.”)

\textsuperscript{18} SCG/SDG&E Response to SCGC Data Request 9.2.
Appendix A

Witness Qualifications
SOUTHERN CALIFORNIA EDISON COMPANY

QUALIFICATIONS AND PREPARED TESTIMONY

OF ANTHONY R. FRONTINO

Please state your name and business address for the record.

A. My name is Tony Frontino, and my business address is 2244 Walnut Grove Avenue, Rosemead, California 91770.

Q. Briefly describe your present responsibilities at the Southern California Edison Company.


Q. Briefly describe your educational and professional background.

A. I received a Bachelor’s Degree in Business Administration from California State University, Chico in 1996.

From 1997-2001, I worked for the California Power Exchange in a variety of roles. As part of the Operations Team, I was responsible for supporting the successful launch of the CalPX market on March 31, 1998. After the launch, I worked as a Market Operator on the Day-Ahead Desk, Hour-Ahead Desk and Real-Time Desk. In 1999, I relocated to Pasadena and worked in the Marketing Department as a Client Executive responsible for managing the commercial activities of the largest CalPX Market Participants.

From 2001 – 2008, I worked for the Automated Power Exchange (APX) as the Director, Business Development. I was responsible for managing the west coast commercial activities supporting APX and their client’s participation in the CAISO markets.


Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony in this proceeding is to sponsor the portions of [insert updated information]
Q. Was this material prepared by you or under your supervision?
A. Yes, it was.

Q. Insofar as this material is factual in nature, do you believe it to be correct?
A. Yes, I do.

Q. Insofar as this material is in the nature of opinion or judgment, does it represent your best judgment?
A. Yes, it does.

Q. Does this conclude your qualifications and prepared testimony?
A. Yes, it does.
Q. Please state your name and business address for the record.
A. My name is Robert Grimm, and my business address is 2244 Walnut Grove Avenue, Rosemead, California 91770.

Q. Briefly describe your present responsibilities at the Southern California Edison Company.
A. I am a Senior Advisor in Southern California Edison Company (SCE) Regulatory Affairs Department.

Q. Briefly describe your educational and professional background.
A. I received a Bachelor’s Degree in 1979 from the University of California, Davis in Mechanical Engineering and a Master’s Degree in Business Administration in 1997 from Saint Mary’s College of California, Moraga. I also have a Professional Engineering License in Mechanical Engineering issued by the state of California.

I have been employed by SCE and have worked on natural gas matters at SCE since 2005. I began working in the energy industry in 1979 and before joining SCE, my employment included approximately two years at the California Independent System Operator and 20 years at Pacific Gas & Electric Company.

Q. What is the purpose of your testimony in this proceeding?
A. The purpose of my testimony in this proceeding is to sponsor portions of Exhibit SCE-01, titled Prepared Intervenor Testimony of Southern California Edison Company as identified in the Table of Contents thereto.

Q. Was this material prepared by you or under your supervision?
A. Yes, it was.

Q. Insofar as this material is factual in nature, do you believe it to be correct?
A. Yes, I do.
Q. Insofar as this material is in the nature of opinion or judgment, does it represent your best judgment?

A. Yes, it does.

Q. Does this conclude your qualifications and prepared testimony?

A. Yes, it does.
SOUTHERN CALIFORNIA EDISON COMPANY

QUALIFICATIONS AND PREPARED TESTIMONY

OF ROBERT A. THOMAS

Q. Please state your name and business address for the record.
A. My name is Robert Thomas, and my business address is 2244 Walnut Grove Avenue, Rosemead, California 91770.

Q. Briefly describe your present responsibilities at the Southern California Edison Company.
A. I am Manager of the Rate Design Group in the Regulatory Affairs Department at Southern California Edison Company. In this position, I am responsible for development of SCE’s rate designs. I have held this position since November 20, 2006.

Q. Briefly describe your educational and professional background.
A. I hold a Bachelor of Science and Engineering from the University of Arizona, a Master’s in Business Administration from California State Polytechnic University, Pomona and a Professional Engineering License in Mechanical Engineering. Prior to my present position, my responsibilities have included Manager of the Analysis and Program Support Group, within SCE’s Business Customer Division, where I was responsible for providing customer specific rate and financial analyses involving self-generation, load growth, contract rates, and hourly pricing options. Prior to this position, I was the SCE’s Program Manager for the Self Generation Incentive Program. In this position, I was responsible for all aspects of the program to include defining program parameters, dispute resolution, application processing, program promotion and was SCE’s lead representative on the SGIP Working Group.

Q. What is the purpose of your testimony in this proceeding?
A. The purpose of my testimony in this proceeding is to sponsor portions of Exhibit SCE-01, titled Prepared Intervenor Testimony of Southern California Edison Company as identified in the Table of Contents thereto.

Q. Was this material prepared by you or under your supervision?
A. Yes, it was.
Q. Insofar as this material is factual in nature, do you believe it to be correct?
A. Yes, I do.
Q. Insofar as this material is in the nature of opinion or judgment, does it represent your best judgment?
A. Yes, it does.
Q. Does this conclude your qualifications and prepared testimony?
A. Yes, it does.