

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

Application of Southern California Edison  
Company (U338E) for Approval of Its Charge  
Ready and Market Education Programs

Application 14-10-014  
(Filed October 30, 2014)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY TO COMMENTS**  
**ON SCE'S RESPONSE TO ASSIGNED COMMISSIONER AND ADMINISTRATIVE**  
**LAW JUDGE'S RULING FOR COMMENTS**

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Dated: **October 9, 2015**

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**I.**

**INTRODUCTION**

Pursuant to the Rules of Practice and Procedure of the California Public Utilities Commission (“CPUC” or “Commission”), and in compliance with the *Assigned Commissioner and Administrative Law Judge’s Ruling for Comments*, dated September 14, 2015 (Ruling), Southern California Edison Company (“SCE”) respectfully submits this reply to parties’ comments on SCE’s Response to the Ruling.<sup>1</sup> SCE appreciates stakeholders’ general support of SCE’s Charge Ready Phase 1 Pilot proposal and herein addresses questions and remarks in Opening Comments filed by the Office of Ratepayer Advocates (“ORA”) and the Green Power Institute (“GPI”).<sup>2</sup>

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<sup>1</sup> SCE’s Response to Assigned Commissioner and Administrative Law Judge’s Ruling for Comments was filed on September 28, 2015 (“SCE Response to the Ruling”).

<sup>2</sup> ORA and GPI filed Opening Comments to SCE’s Response to the Ruling on October 5, 2015 (“ORA Opening Comments” and “GPI Opening Comments”).

**II.**  
**DISCUSSION**

**A. SCE Supports ORA and GPI’s Recommendation that the Commission Authorize a Memorandum Account to Record any Excess Pilot Costs**

ORA and GPI recommend the Commission authorize SCE to establish a separate memorandum account as a way to track costs that exceed budget.<sup>3</sup> ORA makes this recommendation because a memorandum account “gives the Commission the opportunity to review the reasonableness of these costs [sic] overruns and decide how they should be treated in SCE’s revenue requirement in its pending Phase 2 application.”<sup>4</sup> SCE supports ORA’s and GPI’s recommendation that the Commission authorize SCE to establish a Charge Ready Program Memorandum Account (“CRPMA”) to track any such costs. If the Commission authorizes the CRPMA to track potential cost overruns for the Phase 1 Pilot, SCE agrees to record only the revenue requirements associated with any budget cap adopted in the Commission’s final decision in the Charge Ready Program Balancing Account (“CRPBA”).

GPI also states that SCE’s proposal not to continue Phase 1 after authorized funds are exhausted seems to contradict SCE’s discussion regarding how excess spend will be managed.<sup>5</sup> GPI requests that SCE provide clarification.<sup>6</sup> SCE clarifies it has no intention of incurring costs in excess of any budget cap adopted in the Commission’s final decision. SCE will diligently manage the Pilot expenditures to comply with any budget cap.<sup>7</sup> SCE’s statements regarding how excess funds should be recorded address the unlikely scenario of a cost overrun, as contemplated by the Settlement Agreement.

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<sup>3</sup> ORA Opening Comments, pp. 3-4; GPI Opening Comments, p. 3.

<sup>4</sup> ORA Opening Comments, p. 4.

<sup>5</sup> GPI Opening Comments, p. 4.

<sup>6</sup> *Ibid.*

<sup>7</sup> SCE Response to the Ruling, pp. 5-7.

**B. SCE Anticipates Quarterly Advisory Board Meetings, But Flexibility Is Needed**

GPI recommends the Charge Ready Advisory Board meet on a quarterly basis.<sup>8</sup> SCE agrees that quarterly meetings appear to be a reasonable frequency, but maintaining flexibility at this time will allow Advisory Board participants to determine a meeting schedule based on business needs once the Advisory Board is launched. This approach would accommodate participants' limited time and allow flexibility to schedule meetings more frequently if there are pressing issues to discuss, or less frequently as appropriate.

**C. SCE Will Use Pilot Results to Inform Phase 2**

GPI requests that SCE clarify what SCE will do if the Commission does not approve Phase 2.<sup>9</sup> At this time, SCE declines to speculate on what, if any, next steps SCE may take if the Commission does not ultimately approve SCE's Phase 2 proposal.

**D. SCE's Education & Outreach Proposal Will Meet Pilot Needs**

GPI recommends that the Commission require SCE to create an "Electric Vehicle Charging Education and Outreach Plan" that sets forth a broader vision for how education and outreach ("E&O") will be practiced and effectively monitored by SCE.<sup>10</sup> GPI also recommends that at least 25% of the pilot budget be devoted to E&O, "including large third party programs."<sup>11</sup> SCE agrees that a lack of consumer education is a barrier to EV adoption and that E&O is vital to developing the EV market. However, as stated in SCE's previous reply comments on this same topic, the E&O proposal and funding amount proposed for Phase 1 will meet E&O Pilot needs and SCE is in the best position to administer E&O in its service

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<sup>8</sup> GPI Opening Comments, p. 2.

<sup>9</sup> GPI Opening Comments, p. 4, asking "for example, will SCE revise and resubmit its application for a different approach to Phase 2, or will it terminate the program at that point?"

<sup>10</sup> GPI Opening Comments, pp. 5-7.

<sup>11</sup> GPI Opening Comments, pp. 5-7.

territory.<sup>12</sup> As detailed in SCE's testimony, SCE has put forward a comprehensive, broad-based, and targeted E&O plan supported by the Settlement Agreement, which covers Market Education efforts, Transportation Electrification Advisory Services, and Charge Ready Pilot-specific E&O efforts.<sup>13</sup>

### III.

#### CONCLUSION

SCE appreciates the opportunity to respond to Opening Comments.

Respectfully submitted,

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*/s/ Andrea L. Tozer*

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October 9, 2015

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<sup>12</sup> SCE's Reply Comments on Motion for Approval of Phase 1 Settlement Agreement, filed August 25, 2015, pp. 4-6.

<sup>13</sup> Exhibit SCE-01, Vol. 2, pp. 15-17.

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**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 **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY TO COMMENTS ON SCE'S RESPONSE TO ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE'S RULING FOR COMMENTS** on all parties identified on the attached service list(s) **A.14-10-014**. 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.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Assigned ALJ(s) or other addressee(s).

**ALJ Darwin Farrar  
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Executed **October 9, 2015**, at Rosemead, California.

*/S/ Laura Velarde*

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California  
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