

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

Order Instituting Rulemaking to Review Climate
Credits for Current Compliance with Statute and
for Potential Improvements.

Rulemaking 20-05-002

**REPLIES OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
TO RESPONSES TO QUESTIONS ON SHORT-TERM STRAW PROPOSAL
AND THRESHOLD TOPICS FILED**

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Dated: **August 3, 2020**

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AND THRESHOLD TOPICS FILED**

Pursuant to the Assigned Commissioner’s Scoping Memo and Ruling (Ruling) dated July 3, 2020, Southern California Edison Company (SCE) respectfully submits these *Replies to Responses to Questions on Short-Term Straw Proposal and Threshold Topics Filed*.

I.

INTRODUCTION

On July 24, 2020, SCE provided opening responses to the Ruling responding to questions on threshold matters and near-term topics contained in the Straw Proposal. SCE respectfully submits the following reply comments to the other parties’ responses to the Ruling. Specifically, for the reasons discussed below, SCE supports San Diego Gas & Electric Company’s (SDG&E’s) proposal on the California Industry Assistance Factor.

II.

SCE SUPPORTS SAN DIEGO GAS & ELECTRIC'S CALIFORNIA INDUSTRY ASSISTANCE FACTOR PROPOSAL

In Opening Comments to the *Proposed Order Instituting Rulemaking to Review Climate Credits for Current Compliance with Statute and for Potential Improvements* (Rulemaking), SCE suggested the Commission adopt a flat credit for an interim Industry Assistance Factor for 2021 implementation¹ because Decision (D.) 13-12-002 adopted a set of Assistance Factors only through 2020. However, SCE did not make additional recommendations regarding an interim solution in its Opening Responses in the Ruling. After reviewing parties' Opening Responses to the Ruling, SCE supports SDG&E's recommendation of continuing the 10 percent annual decline, making the Industry Assistance Factor 40 percent for 2021 and letting it reduce by 10 percent per year until 2030.²

Whatever the Commission decides for an interim solution, a decision is needed by early October to incorporate the credit in 2021 in SCE's 2021 ERRRA forecast filing update in November. If a decision on this matter is not issued by early October, SCE plans to issue the same Assistance Factor as used in 2020 (50 percent).

III.

CONCLUSION

SCE appreciates the opportunity to provide these replies to parties opening responses to the Ruling.

¹ See SCE's June 4, 2020 Opening Comments to Rulemaking, pp. 2-3.

² See SDG&E's Opening Responses to Ruling, pp. 3-4.

Respectfully submitted,

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/s/ Rebecca Meiers-De Pastino

By: Rebecca Meiers-De Pastino

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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 **REPLIES OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO RESPONSES TO QUESTIONS ON SHORT-TERM STRAW PROPOSAL AND THRESHOLD TOPICS FILED**, on all parties identified on the attached service list(s) for **R.20-05-002**. 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 U.S. Mail to the offices of the assigned ALJ or other addressee(s).

**ALJ Kelly A. Hymes
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102**

Executed this **August 3, 2020**, at Hacienda Heights, California.

/s/ Kelly Morikawa Kwong

Kelly Morikawa Kwong

Legal Administrative Assistant

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California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

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[TOP OF PAGE](#)

[BACK TO INDEX OF SERVICE LISTS](#)