

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

Application Of Southern California Edison  
Company (U338-E) For Authority To  
Increase Its Authorized Revenues For Electric  
Service In 2021, Among Other Things, And  
To Reflect That Increase In Rates.

A.19-08-013

**RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)  
TO MOTION OF THE UTILITY REFORM NETWORK TO STRIKE PORTIONS OF  
UPDATE TESTIMONY SERVED JULY 24, 2020, BY SOUTHERN CALIFORNIA  
EDISON COMPANY**

CLAIRE E. TORCHIA  
RUSSELL A. ARCHER

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-2865  
E-mail: Russell.Archer@sce.com

Dated: **August 6, 2020**

Pursuant to California Public Utilities Commission (CPUC or Commission) Rule of Practice and Procedure 11.1(e),<sup>1</sup> Southern California Edison Company (SCE) respectfully submits this Response to The Utility Reform Network's (TURN) July 30, 2020 Motion to Strike Portions of SCE's Update Testimony (Motion).

**I.**

**INTRODUCTION AND SUMMARY**

TURN's Motion addresses three aspects of SCE's Update Testimony: (1) SCE's updated uncollectibles rate and expense factor; (2) a proposed update to reflect a settlement in principle with Community Choice Aggregators (CCAs) that affects the GRC revenue requirement; and (3) an update to reflect a new statutory requirement to exclude employee costs associated with attempted unionizing activity. For the uncollectibles update issue, TURN's Motion is devoid of merit, as discussed in Section II below. In Section III, SCE agrees that it is appropriate to remove the CCA settlement update as TURN's Motion requests. Section IV clarifies SCE's position on the unionizing costs update testimony (which TURN does not seek to strike).

**I.**

**SCE'S UNCOLLECTIBLES EXPENSE UPDATE TESTIMONY IS APPROPRIATE**

GRC Update Testimony is appropriate when there have been "known changes due to governmental action" (among other factors).<sup>2</sup> Contrary to TURN's assertions, SCE's update testimony on the uncollectibles expense factor<sup>3</sup> fits squarely within the Rate Case Plan criteria for update testimony. After SCE served its direct and rebuttal testimony in this GRC, the Commission issued a decision, D.20-06-003 (a "governmental action"), that ordered SCE to

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<sup>1</sup> Through a July 31, 2020 email ruling, assigned Administrative Law Judge (ALJ) Park set the deadline for this Response for August 6, 2020.

<sup>2</sup> D.89-01-040.

<sup>3</sup> Ex. SCE-52, Chapter VI.

implement a new Arrearage Management Plan (AMP) requiring SCE to write off certain arrearage amounts during this rate case period for participating customers (a “known change”).<sup>4</sup>

Ignoring the fact that SCE’s testimony meets the Rate Case Plan criteria, TURN asks the Commission to add in a new requirement for update testimony that does not appear anywhere in the Rate Case Plan. Under TURN’s view, update testimony could only be served if (1) one of the Rate Case Plan criteria is met, *and* (2) there is an earlier forecast which can be updated by “substituting a known and easily quantified change” but otherwise “retaining the earlier calculation method.”<sup>5</sup> Not only does this latter requirement not exist but, if adopted, it would unreasonably limit the scope of update testimony by excluding updates for statutory or Commission mandates that impose new spending requirements during the GRC period. For example, if the Legislature passed a law mandating a utility to spend an incremental \$15 million on a newly-created governmental program during a GRC proceeding, TURN would exclude those costs from update testimony because there would not be an “earlier calculation method” to benchmark against. In any case, SCE has already complied with TURN’s invented new criteria. SCE included an earlier forecast for its uncollectibles expense factor in its direct testimony.<sup>6</sup> SCE did not change the calculation method of that earlier forecast in its update testimony, but instead added a “known and easily quantified change”—a Test Year adjustment for the impact of the new AMP program—on top of those existing calculations.<sup>7</sup>

Nor is there any prejudice to TURN resulting from the fact that SCE forecasted the impact of the AMP program on its uncollectibles expense factor in its update testimony. While TURN claims that the procedural schedule leaves TURN with little time for meaningful

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<sup>4</sup> See, e.g., D.89-01-040 (including “[k]nown changes due to governmental action such as changes in tax rates, postage rates, or assessed valuation” as appropriate for GRC update testimony).

<sup>5</sup> TURN Motion at p. 2. See also *id.*, p. 6.

<sup>6</sup> See Exs. SCE-03, Vol. 1A, pp. 47-57; SCE-03, Vol. 1AE2, pp. 53-57; SCE-14, pp. 20-23; and SCE-14E2, pp. 20-23.

<sup>7</sup> See Ex. SCE-52, p. 18, Table VI-10 (taking the previously forecast uncollectibles expense factor and adding an adjustment for the AMP program).

discovery and analysis on a new forecast,<sup>8</sup> the procedural schedule was agreed-upon by SCE and TURN, and subsequently adopted by assigned Commissioner Shiroma and the assigned ALJs.<sup>9</sup> More importantly, TURN's claim is belied by its own actions here: SCE served its update testimony on July 24. TURN served a data request on SCE concerning its uncollectibles expense update testimony on July 27, and, at TURN's request, SCE expeditiously provided responses just two days later. It has now been eight days since SCE provided its responses, and, as of the filing of this Response, TURN has not served any additional discovery on SCE regarding its uncollectibles update testimony. Additionally, TURN will have the opportunity to cross-examine SCE's sponsoring witness at update hearings if TURN so chooses. As noted in TURN's July 31, 2020 procedural communication to the ALJs and the service list, TURN requested, SCE did not oppose, and the assigned ALJs have granted, an extension to the schedule for those hearings.

Finally, the fact that the Commission authorized two-way balancing account treatment for uncollectibles in D.20-06-003 is not justification for striking SCE's update testimony.<sup>10</sup> The Commission still has to approve a forecast uncollectibles expense factor in this proceeding to set the initial revenue requirement and, in doing so, the Commission should not ignore the known change to SCE's uncollectibles forecast just because there will eventually be a true up in the future. That would be inequitable and would all-but-assure an under-collection and the resulting need for a large balancing account true-up in the future. TURN is free to test and

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<sup>8</sup> TURN Motion, p. 6.

<sup>9</sup> See November 25, 2019 Assigned Commissioner's Scoping Memo and Ruling at p. 9.

<sup>10</sup> Indeed, TURN's own testimony goes to great lengths to argue why the existence of balancing accounts does not obviate the need for careful review and approval of accurate adopted forecasts. See, e.g., Ex. TURN-02 at p. 29 ("The whole purpose of this rate case is to review whether SCE is allocating its resources effectively and efficiently... through asking the utility to adhere to the forecast set by the Commission. If the Commission chooses to provide what is effectively a two-way balancing account [for wildfire mitigation-related costs], the purpose of the rate case is undermined, and TURN questions the usefulness of all the Commission and party resources that have been expended on the effort to review SCE's GRC request for reasonableness.").

challenge SCE's updated forecast assumptions, but its unmerited attempt to bar the Commission from even considering them should be rejected.

## II.

### **SCE AGREES TO REVISE ITS UPDATE TESTIMONY TO REMOVE THE CCA SETTLEMENT ISSUE**

TURN's Motion seeks to strike the portion of SCE's Update Testimony that reflects the impacts of a settlement agreement between SCE and certain CCAs (*i.e.*, the "SoCal CCAs"). In that settlement agreement, which has not yet been finalized and submitted for Commission approval, SCE has agreed to reduce certain fees charged to CCAs. This will have the effect of reducing SCE's Other Operating Revenue (OOR), because these fees are classified as OOR and therefore offset the overall revenue requirement paid by other customers. SCE believed it was appropriate to submit this adjustment to avoid building in a systemic and unnecessary OOR undercollection.

Settlements such as this one resolving narrow individualized issues are routinely approved by the Commission in GRCs.<sup>11</sup> In addition, SCE provided all parties, including TURN, with written notice of all of the substantive settlement terms. SCE circulated and summarized for all GRC parties the written Settlement in Principle that SCE and the SoCal CCAs had agreed to. After providing to all GRC parties the Settlement in Principle, SCE also hosted an all-party settlement conference to discuss the settlement and receive feedback on it. TURN participated in that conference and had no objection to any of the settlement terms.

SCE agrees, however, that because the settlement has not yet been approved by the Commission, including the impacts of that expected approval in Update Testimony is premature. Accordingly, SCE agrees to withdraw this issue from its update showing and will concurrently

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<sup>11</sup> See, e.g., D.17-09-007 (adopting settlement agreement between SCE and City of Lancaster in SCE's 2018 GRC that modified SCE's CCA then-current fee structure).

submit revised Update Testimony omitting this issue. Upon approval of the settlement agreement, SCE will update the revenue requirement as appropriate.

### **III.**

#### **SCE’S UPDATE TESTIMONY REMOVING COSTS ASSOCIATED WITH UNION ORGANIZING ACTIVITIES IS APPROPRIATE**

TURN’s motion also addresses a reduction of approximately \$1.4 million that SCE made to its Test Year 2021 requested revenue requirement; the basis of the reduction was compliance with Assembly Bill (AB) 560. This new legislation, enacted in late 2019 and effective as of January 1, 2020, prohibits utilities like SCE from rate recovery for expenses incurred “in assisting or deterring union organizing.” Notably, TURN does not seek to strike this testimony. As discussed above, TURN has created new criteria that would allow update testimony only when there is an earlier forecast which can be updated by “substituting a known and easily quantified change” but otherwise “retaining the earlier calculation method.”<sup>12</sup> But TURN apparently believes there should be an exception to its new criteria if the update testimony results in a *decrease* to SCE’s revenue requirement.<sup>13</sup> The Commission should not endorse TURN’s unprincipled and results-oriented proposed new criteria for the admissibility of update testimony.

TURN’s Motion states the following: “The Commission should not be surprised if it sees a new recommendation in TURN’s brief urging adoption of a requirement that SCE employees who engage in activities subject to AB 560 be required to track their time in a manner that ensures compliance with the new statute.”<sup>14</sup> SCE appreciates TURN’s concern but believes that no controversy exists here. SCE represents and warrants that, as of January 1, 2020, SCE

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<sup>12</sup> TURN Motion at p. 2. *See also id.*, p. 6.

<sup>13</sup> *See* TURN Motion at pp. 8-9: (“However, TURN recognizes that SCE’s calculations would lead to a small revenue requirement decrease that would otherwise not occur in the GRC. ... Therefore, while TURN believes SCE’s recommendation is inappropriate for update testimony, under the circumstances here TURN does not seek to strike that portion of the update testimony here.”).

<sup>14</sup> TURN Motion to Strike at p. 9.

established specific accounting and administrative procedures so that all SCE employees who engage in activities subject to AB 560 have their time tracked and recorded to an account that is not charged to customers. This item is not currently in the evidentiary record of this proceeding, but if the ALJs prefer that it be confirmed in the record, SCE can prepare and submit a very brief testimony exhibit for that purpose.

**IV.**

**CONCLUSION**

For the reasons discussed above, TURN's Motion should be denied in its entirety except for Section IV of the Motion regarding the CCA settlement agreement.

Respectfully submitted,

CLAIRE E. TORCHIA  
RUSSELL A. ARCHER

*/s/ Russell A. Archer*

By: \_\_\_\_\_  
Russell A. Archer

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-2865  
E-mail: Russell.Archer@sce.com

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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 **RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO MOTION OF THE UTILITY REFORM NETWORK TO STRIKE PORTIONS OF UPDATE TESTIMONY SERVED JULY 24, 2020, BY SOUTHERN CALIFORNIA EDISON COMPANY** on all parties identified on the attached service list(s) **A.19-08-013**. 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.
- Causing the copies to be sent via U.S. Mail to the offices of the ALJ(s) or other addressee(s).

**ALJ Ehren Seybert**  
**CPUC**  
**Division of ALJs, Room 5041**  
**505 Van Ness Avenue**  
**San Francisco, CA 94102-3214**

**ALJ Sophia Park**  
**CPUC**  
**Division of ALJs, Room 5019**  
**505 Van Ness Avenue**  
**San Francisco, CA 94102-3214**

Executed on **August 6, 2020**, at Rosemead, California.

**/s/ Regina Coburn**  
Regina Coburn  
Legal Administrative Assistant  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770





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### Parties

---

VIDHYA PRABHAKARAN  
 ATTORNEY  
 DAVIS WRIGHT & TREMAINE, LLP  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 FOR: CALIFORNIA CABLE &  
 TELECOMMUNICATIONS ASSOCIATION (CCTA)

NANCY WHANG  
 GENERAL COUNSEL  
 CLEAN POWER ALLIANCE  
 555 W. 5TH STREET, 35TH FL.  
 LOS ANGELES, CA 90013  
 FOR: CLEAN POWER ALLIANCE OF SOUTHERN  
 CALIFORNIA

RUSSELL A. ARCHER  
 SR. ATTORNEY  
 SOUTHERN CALIFORNIA EDISON COMPANY  
 2244 WALNUT GROVE AVE. / PO BOX 800  
 ROSEMEAD, CA 91770  
 FOR: SOUTHERN CALIFORNIA EDISON COMPANY

SHARON L. COHEN  
 SR. ATTORNEY  
 SAN DIEGO GAS & ELECTRIC COMPANY  
 8330 CENTURY PARK COURT, CP32D  
 SAN DIEGO, CA 92123  
 FOR: SDG&E AND SOCALGAS

TADASHI GONDAI  
 DIR - LEGAL ADVOCACY  
 NATIONAL ASIAN AMERICAN COALITION  
 318 WEST LAKE CENTER, STE. 270  
 DALY CITY, CA 94015  
 FOR: NATIONAL DIVERSITY COALITION

ANDREW J. GRAF  
 ASSOCIATE ATTORNEY  
 ADAMS BROADWELL JOSEPH & CARDOZO  
 601 GATEWAY BOULEVARD, SUITE 1000  
 SOUTH SAN FRANCISCO, CA 94080  
 FOR: COALITION OF CALIFORNIA UTILITY  
 EMPLOYEES (CUE)

MARION PELEO  
 CALIF PUBLIC UTILITIES COMMISSION  
 LEGAL DIVISION  
 ROOM 4107  
 505 VAN NESS AVENUE

ELISE TORRES  
 STAFF ATTORNEY  
 THE UTILITY REFORM NETWORK  
 785 MARKET STREET, SUITE 1400  
 SAN FRANCISCO, CA 94103

SAN FRANCISCO, CA 94102-3214  
FOR: PUBLIC ADVOCATES OFFICE

FOR: THE UTILITY REFORM NETWORK

JENNIFER L. WEBERSKI  
LITIGATION SUPERVISOR  
SMALL BUSINESS UTILITY ADVOCATES  
548 MARKET STREET, SUITE 11200  
SAN FRANCISCO, CA 94104  
FOR: SMALL BUSINESS UTILITY ADVOCATES

IBENJAMIN ELLIS  
ATTORNEY  
BUCHALTER  
55 SECOND STREET, SUITE 1700  
SAN FRANCISCO, CA 94105  
FOR: ENERGY PRODUCERS AND USERS  
COALITION

MARY GANDESBERY  
ATTORNEY  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

BRIAN T. CRAGG  
ATTORNEY  
GOODIN, MACBRIDE, SQUERI & DAY, LLP  
505 SANSOME ST., STE. 900  
SAN FRANCISCO, CA 94111  
FOR: ENGINEERS AND SCIENTISTS OF  
CALIFORNIA, LOCAL 20, INTERNATIONAL  
FEDERATION OF PROFESSIONAL & TECHNICAL  
ENGINEERS, AFL-CIO (ESC)

JEANNE B. ARMSTRONG  
ATTORNEY AT LAW  
GOODIN, MACBRIDE, SQUERI & DAY, LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
FOR: SOLAR ENERGY INDUSTRIES ASSOCIATION

MARIA T. BROWNE  
ATTORNEY  
DAVIS WRIGHT TREMAINE LLP (WASHINGTON DC)  
505 MONTGOMERY STREET, STE. 800  
SAN FRANCISCO, CA 94111  
FOR: CONTERRA ULTRA BROADBAND HOLDINGS,  
INC.

SUSANNAH CHURCHILL  
CALIFORNIA DIR.  
VOTE SOLAR  
360 22ND STREET, SUITE 730  
OAKLAND, CA 94612  
FOR: VOTE SOLAR

MELISSA W. KASNITZ  
ATTORNEY  
CENTER FOR ACCESSIBLE TECHNOLOGY  
3075 ADELINE STREET, SUITE 220  
BERKELEY, CA 94703  
FOR: CENTER FOR ACCESSIBLE TECHNOLOGY  
(CFORAT)

BOTH OLHASSO  
AGRICULTURAL ENERGY CONSUMERS ASSOCIATIO  
925 L STREET, SUITE 800  
SACRAMENTO, CA 95814  
FOR: AGRICULTURAL ENERGY CONSUMERS  
ASSOCIATION

SCOTT BLAISING  
COUNSEL  
BRAUN BLAISING SMITH WYNNE P.C.  
915 L STREET, SUITE 1480  
SACRAMENTO, CA 95814  
FOR: CALIFORNIA CHOICE ENERGY AUTHORITY

## Information Only

---

ANNA FERRO  
DAVIS WRIGHT TREMAINE LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000

CASE COORDINATION  
PACIFIC GAS AND ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

CHRISTINE M. WALWYN  
ADMINISTRATIVE LAW JUDGE  
CPUC

DAVID HUANG  
DAVIS WRIGHT TREMAINE LLP  
EMAIL ONLY

EMAIL ONLY  
EMAIL ONLY, CA 00000

EMAIL ONLY, CA 00000

FRANZ CHENG  
CPUC - ENERGY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JUSTIN REGNIER  
EXE. DIV  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

PAUL PATTERSON  
GLENROCK ASSOCIATES LLC  
EMAIL ONLY  
EMAIL ONLY, NY 00000

PRACHI KOHLI  
NATIONAL DIVERSITY COALITION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

REGULATORY CLERK  
BRAUN BLAISING SMITH WYNNE, PC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

ROBERT EARLE  
EMAIL ONLY  
EMAIL ONLY, CA 00000

SHILPA RAMAIYA  
PACIFIC GAS AND ELECTRIC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

MRW & ASSOCIATES, LLC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DAVIS WRIGHT TREMAINE LLP  
EMAIL ONLY  
EMAIL ONLY, CA 00000

GREGG ORRILL  
EXECUTIVE DIRECTOR  
UBS SECURITIES  
1285 AVENUE OF THE AMERICIAS  
NEW YORK, NY 10019

GREGORY REISS  
CENTENUS GLOBAL MANAGEMENT, LP  
437 MADISON AVENUE, SUITE 19B  
NEW YORK, NY 10022

ALEJANDRO MENDEZ  
MADISON AVENUE PARTNERS  
150 EAST 58TH STREET, 14TH FLOOR  
NEW YORK, NY 10155

RICK UMOFF  
REGULATORY COUNSEL & DIR.  
SOLAR ENERGY INDUSTRIES ASSOCIATION  
600 14TH NW SUITE 400  
WASHINGTON, DC 20005  
FOR: SEIA

BLAKE ELDER  
POLICY RESEARCH ANALYST  
EQ RESEARCH, LLC  
1155 KILDAIRE FARM ROAD, SUITE 202-203  
CARY, NC 27511

MAURICE BRUBAKER  
BRUBAKER & ASSOCIATES, INC.  
16690 SWINGLEY RIDGE ROAD, SUITE 140  
CHESTERFIELD, MO 63017

MAURICE BRUBAKER  
BRUBAKER & ASSOCIATES, INC. (BAI  
PO BOX 412000  
ST LOUIS, MO 63141

ANDREW STEINBERG  
SO. CALIF GAS CO. / SAN DIEGO GAS & ELEC  
555 WEST FIFTH ST., 15TH FL. MS GT19A7  
LOS ANGELES, CA 90013

CC SONG  
DIR - REGULATORY  
CLEAN POWER ALLIANCE  
555 W. 5TH STREET, 35TH FLOOR  
LOS ANGELES, CA 90013

JENNY AU  
CALIF PUBLIC UTILITIES COMMISSION  
MARKET STRUCTURE, COSTS AND NATURAL GAS  
320 West 4th Street Suite 500  
Los Angeles, CA 90013

LAURA L. KRANNAWITTER  
CALIF PUBLIC UTILITIES COMMISSION  
MARKET STRUCTURE, COSTS AND NATURAL GAS  
320 West 4th Street Suite 500  
Los Angeles, CA 90013

JIM TOMLINSON  
DAVIS WRIGHT TREMAINE LLP  
EMAIL ONLY  
EMAIL ONLY, CA 90017

PAUL HUNT  
207 MANZANITA AVE.  
SIERRA MADRE, CA 91024

DANIEL W. DOUGLASS  
ATTORNEY  
DOUGLASS & LIDDELL  
4766 PARK GRANADA, SUITE 209  
CALABASAS, CA 91302

ALLISON BAHEN  
EDISON INTERNATIONAL  
2244 WALNUT GROVE AVE.  
ROSEMEAD, CA 91770

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
8631 RUSH STREET  
ROSEMEAD, CA 91770

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
PO BOX 800, 8631 RUSH STREET  
ROSEMEAD, CA 91770

DEREK MATSUSHIMA  
EDISON INTERNATIONAL  
2244 WALNUT GROVE AVE.  
ROSEMEAD, CA 91770

FADIA R. KHOURY  
DIR. & MANAGING ATTORNEY  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE. G.O.1, RM 348H  
ROSEMEAD, CA 91770

GUSTAVO GOMEZ  
EDISON INTERNATIONAL  
2244 WALNUT GROVE AVE  
ROSEMEAD, CA 91770

KATHERINE L. HERNANDEZ  
CASE ADMIN  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE  
ROSEMEAD, CA 91770

SAM RAMRAJ  
EDISON INTERNATIONAL  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

VANESSA RUIZ  
ANALYST II CASE ADMIN / STATE REG OPS  
SOUTHERN CALIFORNIA EDISON COMPANY  
8631 RUSH STREET  
ROSEMEAD, CA 91770

DAVID CHENG  
STAFF ATTORNEY  
THE UTILITY REFORM NETWORK  
1620 5TH AVENUE, SUITE 810  
SAN DIEGO, CA 92101

CENTRAL FILES  
SAN DIEGO GAS AND ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP31E  
SAN DIEGO, CA 92123

CHUCK MANZUK  
DIR - GRC & REVENUE  
SEMPRA UTILITIES  
8330 CENTURY PARK COURT  
SAN DIEGO, CA 92123

JAMIE K. YORK  
CASE MGR - REGULATORY  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP31E  
SAN DIEGO, CA 92123

JOE MCCAWLEY  
 SAN DIEGO GAS & ELECTRIC COMPANY  
 8330 CENTURY PARK COURT  
 SAN DIEGO, CA 92123

NORMA JASSO  
 MGR - REGULATORY  
 SAN DIEGO GAS & ELECTRIC COMPANY  
 8330 CENTURY PARK CT, CP31E  
 SAN DIEGO, CA 92123  
 FOR: SDG&E AND SOCALGAS

SUE MARA  
 CONSULTANT  
 RTO ADVISORS, L.L.C.  
 164 SPRINGDALE WAY  
 REDWOOD CITY, CA 94062

RACHEL KOSS  
 ADAMS BROADWELL JOSEPH & CARDOZO  
 601 GATEWAY BOULEVARD, SUITE 1000  
 SO SAN FRANCISCO, CA 94080

ALEXANDER J. ABRAMSON  
 CALIF PUBLIC UTILITIES COMMISSION  
 BROADBAND, POLICY & ANALYSIS BRANCH  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

ANAND DURVASULA  
 CALIF PUBLIC UTILITIES COMMISSION  
 COMMISSIONER RANDOLPH  
 ROOM 5130  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

ANNA MADARASZ  
 CALIF PUBLIC UTILITIES COMMISSION  
 SAFETY BRANCH  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

ANNA YANG  
 CALIF PUBLIC UTILITIES COMMISSION  
 SAFETY BRANCH  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

ANNALISSA A. HERBERT  
 CALIF PUBLIC UTILITIES COMMISSION  
 ADMINISTRATIVE LAW JUDGE DIVISION  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

CHARLOTTE CHITADJE  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY COST OF SERVICE & NATURAL GAS BRA  
 AREA 3-C  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

CHRISTINA SYRIANI  
 CALIF PUBLIC UTILITIES COMMISSION  
 SAFETY BRANCH  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

CHRISTINE NUTILE  
 CALIF PUBLIC UTILITIES COMMISSION  
 INFORMATION TECHNOLOGY SERVICES DIVISION  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

CHRISTOPHER PARKES  
 CALIF PUBLIC UTILITIES COMMISSION  
 SAFETY BRANCH  
 AREA 2-D  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

EHREN SEYBERT  
 CALIF PUBLIC UTILITIES COMMISSION  
 ADMINISTRATIVE LAW JUDGE DIVISION  
 ROOM 5041  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

JAMES DONOVAN  
 CALIF PUBLIC UTILITIES COMMISSION  
 ADMINISTRATIVE LAW JUDGE DIVISION  
 ROOM 5013  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

LAURA A. MARTIN  
 CALIF PUBLIC UTILITIES COMMISSION  
 MARKET STRUCTURE, COSTS AND NATURAL GAS  
 AREA 4-A  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

LEUWAM TESFAI  
 CALIF PUBLIC UTILITIES COMMISSION  
 COMMISSIONER SHIROMA  
 ROOM 5137  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

MARC HUTTON  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY INFRASTRUCTURE BRANCH  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

MARYAM GHADESSI  
 CALIF PUBLIC UTILITIES COMMISSION  
 MARKET STRUCTURE, COSTS AND NATURAL GAS  
 AREA 4-A  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

POUNEH GHAFARIAN  
 CALIF PUBLIC UTILITIES COMMISSION  
 LEGAL DIVISION  
 ROOM 5025  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

PUI-WA LI  
 CALIF PUBLIC UTILITIES COMMISSION  
 SAFETY BRANCH  
 AREA  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

RICHARD WHITE  
 CALIF PUBLIC UTILITIES COMMISSION  
 SAFETY POLICY DIVISION  
 ROOM 5-A  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

ROBERT M. POCTA  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY COST OF SERVICE & NATURAL GAS BRA  
 ROOM 4205  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

SELINA SHEK  
 CALIF PUBLIC UTILITIES COMMISSION  
 LEGAL DIVISION  
 ROOM 4107  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

SOPHIA PARK  
 CALIF PUBLIC UTILITIES COMMISSION  
 ADMINISTRATIVE LAW JUDGE DIVISION  
 ROOM 5019  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

TRUMAN L. BURNS  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY COST OF SERVICE & NATURAL GAS BRA  
 ROOM 4205  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

VANESSA BALDWIN  
 CALIF PUBLIC UTILITIES COMMISSION  
 LEGAL DIVISION  
 ROOM 5029  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

YAKOV LASKO  
 CALIF PUBLIC UTILITIES COMMISSION  
 ENERGY COST OF SERVICE & NATURAL GAS BRA  
 ROOM 4101  
 505 VAN NESS AVENUE  
 SAN FRANCISCO, CA 94102-3214

HAYLEY GOODSON  
 STAFF ATTORNEY  
 THE UTILITY REFORM NETWORK  
 785 MARKET STREET, SUITE 1400  
 SAN FRANCISCO, CA 94103

KATY MORSONY  
 STAFF ATTORNEY  
 THE UTILITY REFORM NETWORK  
 785 MARKET STREET, SUITE 1400  
 SAN FRANCISCO, CA 94103

MARCEL HAWIGER  
 ENERGY ATTORNEY  
 THE UTILITY REFORM NETWORK  
 785 MARKET STREET, SUITE 1400  
 SAN FRANCISCO, CA 94103

ROBERT FINKELSTEIN  
 THE UTILITY REFORM NETWORK  
 785 MARKET ST., STE. 1400  
 SAN FRANCISCO, CA 94103

STEPHEN GREEN  
 LEGAL ASSISTANT  
 THE UTILITY RETURN NETWORK  
 785 MARKET STREET, SUITE 1400  
 SAN FRANCISCO, CA 94103

JAMES BIRKELUND  
 PRESIDENT & GEN. COUNSEL  
 SMALL BUSINESS UTILITY ADVOCATES  
 548 MARKET STREET, STE 11200  
 SAN FRANCISCO, CA 94104

GREGORY HOLISKO  
 PACIFIC GAS & ELECTRIC COMPANY  
 77 BEALE STREET  
 SAN FRANCISCO, CA 94105

LILLIAN RAFII  
 ATTORNEY  
 BUCHALTER  
 55 SECOND STREET, SUITE 1700  
 SAN FRANCISCO, CA 94105

MICHAEL ALCANTAR  
 ATTORNEY AT LAW  
 BUCHALTER, A PROFESSIONAL CORPORATION  
 55 SECOND STREET, SUITE 1700  
 SAN FRANCISCO, CA 94105  
 FOR: ENERGY PRODUCERS AND USERS  
 COALITION

MICHAEL CADE  
 ANALYST - ENERGY & NAT'L RESOURCES  
 BUCHALTER, A PROFESSIONAL CORPORATION  
 55 SECOND STREET, SUITE 1700  
 SAN FRANCISCO, CA 94105

BUCHALTER, A PROFESSIONAL CORPORATION  
 55 SECOND STREET, SUITE 1700  
 SAN FRANCISCO, CA 94105

KARI CAMERON  
 LEGAL ADMIN.  
 BUCHALTER  
 55 SECOND STREET, STE. 1700  
 SAN FRANCISCO, CA 94105-3493

RYAN M. APPEL  
 ATTORNEY  
 DAVIS WRIGHT TREMAINE LLP (WASHINGTON DC)  
 505 MONTGOMERY STREET, STE. 800  
 SAN FRANCISCO, CA 94111  
 FOR: CONterra ULTRA BROADBAND HOLDINGS,  
 INC.

CONNOR DOYLE  
 PACIFIC GAS & ELECTRIC COMPANY  
 PO BOX 770000, MAIL CODE: B10A  
 SAN FRANCISCO, CA 94177

CATHERINE E. YAP  
 BARKOVICH & YAP, INC.  
 PO BOX 11031  
 OAKLAND, CA 94611

ED SMELOFF  
 MANAGING DIR - REGULATORY TEAM  
 VOTE SOLAR  
 360 22ND STREET, SUITE 730  
 OAKLAND, CA 94612

ALEX J. MORRIS  
 EXE. DIR.  
 CALIFORNIA ENERGY STORAGE ALLIANCE  
 2150 ALLSTON WAY, STE.400  
 BERKELEY, CA 94704

CAROLYN KEHREIN  
 ENERGY MANAGEMENT SERVICES  
 2602 CELEBRATION WAY  
 WOODLAND, CA 95776

DRUCILLA DUNTON  
 CALIF PUBLIC UTILITIES COMMISSION  
 ADMINISTRATION & BUDGET UNIT  
 180 Promenade Circle, Suite 115  
 Sacramento, CA 95834

[TOP OF PAGE](#)

[BACK TO INDEX OF SERVICE LISTS](#)