

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

Order Instituting Investigation into the  
November 2018 Submission of Southern  
California Edison Risk Assessment and  
Mitigation Phase.

I.18-11-006

**NOT CONSOLIDATED**

Application Of Southern California Edison  
Company (U 338-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

**JOINT CASE MANAGEMENT STATEMENT OF SOUTHERN CALIFORNIA EDISON  
COMPANY (U 338-E), CALIFORNIA PUBLIC ADVOCATES OFFICE, THE UTILITY  
REFORM NETWORK, ENERGY PRODUCERS AND USERS COALITION, AND  
COALITION OF CALIFORNIA UTILITY EMPLOYEES**

FADIA RAFEEDIE KHOURY  
KRIS G. VYAS  
RUSSELL A. ARCHER

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6613  
Facsimile: (626) 302-6693  
E-mail: Kris.Vyas@sce.com

Dated: **February 20, 2020**

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Pursuant to the January 29, 2020 Administrative Law Judge’s Ruling Requiring Joint Case Management Statement (Ruling), Southern California Edison Company (SCE) respectfully submits this Joint Case Management Statement on behalf of itself and the following parties: The Commission’s Public Advocates Office (Cal Advocates), The Utility Reform Network (TURN), Energy Producers and Users Coalition (EPUC), and Coalition of California Utility Employees (collectively, the 2021 GRC Parties).<sup>1</sup>

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<sup>1</sup> Pursuant to Rule 1.8(d), counsel for SCE confirms that representatives of the above-listed 2021 GRC Parties have authorized SCE to file this Joint Case Management Statement on behalf of their respective organizations. SCE also shared a draft of this Joint Case Management Statement with the Commission’s Safety and Enforcement Division. The Ruling specifically required the filing of this Joint Case Management Statement in both the A.19-08-013 and I.18-11-006 dockets.

Below, the 2021 GRC Parties set forth their respective positions on the Ruling's enumerated topics.<sup>2</sup>

## I.

### **PARTY COMMENTS ON THE SPECIFIC ISSUES SET FORTH IN THE RULING**

- **Whether updates or amendments are needed to SCE's Risk Assessment Mitigation Phase (RAMP) submission, filed November 15, 2018, and Amendment, filed March 14, 2019, in I.18-11-006, prior to SCE amending its Test Year 2021 GRC Application to add a third attrition year.**

#### **SCE Response:**

SCE's proposals are meant to impose the minimum amount of burden on all parties (including most importantly the Commission and its staff), while affording the appropriate time to carefully consider the necessary funding SCE will require in 2024 to effectively serve its customers at reasonable cost. It remains paramount that the position the Commission ultimately adopts here must not lead to delay in timely issuance of a Track 1 decision. In SCE's view, the Commission has repeatedly endorsed the importance of a timely final result, including by making necessary text changes to the draft Rate Case Plan Proposed Decision,<sup>3</sup> by adoption in the Scoping Memo of a Track 1 schedule that appropriately adheres to the Rate Case Plan, as well as by the Ruling's specific guidance that the third attrition year "*schedule may be separate from, and later than, a decision on the 'Track 1' schedule ....*"<sup>4</sup>

SCE suggests that the SCE RAMP analysis for year 2024 be holistically integrated into SCE's next RAMP showing (which files in May of 2022). Using this path, there will be no burden to any stakeholder of SCE having to modify any aspect of its 2018 RAMP showing

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<sup>2</sup> EPUC takes no position on the issues set forth herein. The California Choice Energy Authority (CalChoice) does not object to SCE's proposals but notes that it has not been active on these particular issues.

<sup>3</sup> See January 16, 2020 Revision 2 of the Proposed Decision in R.13-11-006 at pp. 51-52.

<sup>4</sup> Ruling at p. 2 (emphasis added).

(which covered years 2018-2023). SED can review and provide its report on its normal RAMP timeframe. Moreover, the RAMP Parties can review and provide their comments on the normal RAMP timeframe. If SCE's 2024 funding request is analyzed in a later GRC track (as discussed below), then the RAMP analysis would still be timely for purposes of *integrating into SCE's funding request for 2024*. And a decision on the Track 1 spending request and the just-filed SCE Wildfire Mitigation Plan can inform the RAMP showing, which will benefit all stakeholders.

**CUE Response:** CUE supports SCE's RAMP proposals.

**TURN Response:** TURN does not believe that a RAMP submission for 2024 is necessary in order to consider SCE's third attrition year proposal. Further, and as will be discussed in TURN's response below, it is unreasonable and unduly burdensome to parties delay the resolution of SCE's third attrition year to a later Track in this proceeding. Given the unprecedented circumstances arising from this unique situation, it is reasonable to not require SCE to submit a RAMP submission for year 2024. The RAMP process is designed to be "an initial phase of each utility's GRC,"<sup>5</sup> and a utility's GRC application is intended to follow its RAMP showing by approximately one year. Accordingly, it does not make sense to include 2024 in SCE's next RAMP submission given that 2024 will not be part of SCE's next GRC.

- **If updates or amendments are needed, additional issues to be included in, or amendments to, the scope of the proceeding for I.18-11-006.**

**SCE Response:** SCE believes that there are no additional issues that need to be included in, or amendments that need to be made to, the scope of I.18-11-006 (RAMP OII). Any and all RAMP issues that may arise can be addressed in the docket for SCE's Test Year 2021 GRC.

**CUE Response:** CUE supports SCE's RAMP proposals.

- **Whether to consolidate I.18-11-006 and A.19-08-013.**

**SCE Response:** SCE believes that I.18-11-006 can now be closed. The RAMP Parties have provided the documents required by the applicable CPUC decisions (*i.e.*, the CPUC has in

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<sup>5</sup> D.14-12-025, p. 11.

hand SCE's detailed RAMP showing, SED's Regulatory Review Report on that SCE showing, and the comments from the Parties.). SED's Regulatory Review Report concluded that SCE's showing met the applicable RAMP requirements.<sup>6</sup>

Closing out the RAMP OII will not hinder discovery into SCE's RAMP report or inquiry concerning RAMP-related issues. Any such questions can be asked within the GRC docket. SCE has a GRC witness (Robert LeMoine) that has testified extensively in Exhibit SCE-01, Vol. 2 regarding the particulars of SCE's RAMP. In fact, per the direction provided in the GRC Scoping Memo, in April SCE will be serving supplemental testimony *in the GRC* that further addresses certain RAMP Parties' comments regarding SCE's RAMP.

In other California IOUs' RAMP OIIs, the Commission has closed the OII once the GRC application had been filed that incorporated the RAMP material. *See* D.19-10-007, p. 17 (Closing RAMP OII because "[t]he final step in the RAMP process was completed upon integration of the RAMP filing and comments into PG&E's TY2020 GRC application, specifically, in the assessment of safety risks and proposed mitigations. Those proposals shall be addressed and resolved in [PG&E's GRC]."). *See also* D.18-04-016, which closed Sempra's previous RAMP OII. There, the Commission stated:

The integration of findings from the RAMP process into SDG&E's and SoCalGas' TY2019 GRC applications completes the RAMP process and no further action in these proceedings is required. RAMP-related testimonies, the level and amount of safety mitigation planned, proposed spending for safety mitigation activities, and efficiency of risk mitigation funding are to be reviewed in the TY2019 GRC applications.... [T]here was discussion on whether to consolidate the RAMP proceedings with the TY2019 GRC proceedings.... [We] reiterate that the final step of integrating findings in the RAMP proceedings into the TY2019 GRC testimony has been completed and RAMP-related requests in the TY2019 GRCs will be reviewed in the GRC applications. *There is also little value in keeping the RAMP proceedings open in the*

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<sup>6</sup> *See* SED's Regulatory Review of SCE RAMP, p. 60.

*event that something arises in the TY2019 GRC proceedings as any such issue can be dealt with in those proceedings.<sup>7</sup>*

**CUE Response:** CUE supports SCE's RAMP proposals.

**TURN Response:** If the Commission declines to consolidate I.18-11-006 and A.19-08-013, TURN recommends that the Commission authorize intervenors to include any hours and costs incurred in the RAMP proceeding in a request for intervenor compensation filed in SCE's Test Year 2021 GRC. The Commission authorized this same approach when it closed the RAMP proceedings associated with PG&E's Test Year 2020 GRC and SDG&E's and SoCalGas's Test Year 2019 GRCs.<sup>8</sup>

- **Additional issues to be included in, or amendments to, the scope of the proceeding for A.19-08-013.**

**SCE Response:** SCE notes that concurrently with the filing of this Case Management Statement, SCE is submitting amended testimony that removes the implementation costs and offsetting benefits associated with the Customer Service Re-Platform Project (CSRP) and reflects changes to forecasts impacted by the revised CSRP schedule, consistent with statements set forth in the November 8, 2019 GRC Second Joint Case Management Statement in Section III. SCE does not believe any additional issues or scope amendments in this proceeding are necessary or appropriate at this time (except to the extent already contemplated by the Scoping Memo and previous rulings).

- **Updates to the procedural schedule in I.18-11-006 and A.19-08-013, including:**
  - **The schedule to update and review modifications to SCE's 2018 RAMP submission, including, but not limited to, an opportunity for SED to review and report on the updated or amended RAMP submission, and for parties to file comments.**

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<sup>7</sup> D.18-04-016 at pp. 12-13 (emphasis added).

<sup>8</sup> D.19-10-007, pp. 17-18 (closing I.17-11-003, PG&E's 2017 RAMP proceeding); D.18-04-016, p. 13 (closing I.16-10-015 and I.16-10-016, SDG&E's and SoCalGas's 2016 RAMP proceedings).

**SCE Response:** Please see above for a proposal to address RAMP for the added attrition year. SCE respectfully contends that it is less feasible to develop RAMP analysis for 2024 and attempt to integrate it after-the-fact into SCE's November 2018 RAMP showing. First, such after-the-fact modification of SCE's 2018 RAMP submission may place unneeded burdens on SED to review and report on the updated/amended RAMP submission. The proposal SCE outlines above would instead allow SED to perform its review on a normal timeframe and as a holistic part of SED's review of SCE's next RAMP showing.

Any material now added to SCE's already-submitted RAMP showing may differ from what SCE filed in November 2018, particularly for wildfire risk mitigations. A great deal has changed in the 15 months since SCE timely filed its RAMP. SCE also notes that the Commission decisions that govern the RAMP process and schedule do not contemplate updating the original RAMP filing, except as appropriate in the GRC application (which is intended to follow the RAMP showing by a year).

**CUE Response:** CUE supports SCE's RAMP proposals.

- **The procedural schedule for adding a third attrition year to SCE's Test Year 2021 GRC application. Note: This schedule may be separate from, and later than, a decision on the "Track 1" schedule as determined in the November 25, 2019 Assigned Commissioner's Scoping Memo and Ruling.**

**SCE Response:** To facilitate efficient consideration of a third attrition year, incorporate an updated RAMP analysis, leverage results from the RCP OIR's upcoming workshops regarding attrition, and afford all parties the opportunity to evaluate more current and updated forecasts, SCE believes a separate "Track 4" should be established for the third attrition year.<sup>2</sup>

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<sup>2</sup> The Scoping Memo has already established a "Track 2" and "Track 3" in this proceeding. "Track 2" should not be confused with GRC "Phase 2," which SCE will file in a separate docket on a separate procedural schedule. SCE will be submitting a request for an extension of time to make its "Phase 2" filing (currently due June 30, 2020) so that it can efficiently accommodate a four-year GRC cycle and address other timing matters.

This Track 4 should incorporate SCE’s proposed RAMP schedule as discussed above, and the Commission should issue a final decision prior to the beginning of 2024 to allow timely implementation of a 2024 attrition year adopted revenue requirement. SCE sets forth a proposed Track 4 schedule below:

<b>Date</b>	<b>Activity</b>
5/13/2022	SCE files RAMP, and serves Direct Testimony on 3rd Attrition Year Request
9/1/2022	SED files and serves report on SCE’s RAMP submission
11/15/2022	Opening Comments on RAMP submission and the SED report
12/1/2022	Reply Comments on RAMP submission
2/15/2023	Intervenor Direct Testimony on 3rd Attrition Year
3/31/2023	SCE Rebuttal Testimony on 3rd Attrition Year
4/19/2023	Evidentiary Hearings on 3rd Attrition Year
5/22/2023	Opening Briefs on 3rd Attrition Year
6/22/2023	Reply Briefs on 3rd Attrition Year
9/22/2023	Track 4 Proposed Decision on 3rd Attrition Year

**Cal Advocates Response:** The Public Advocates Office does not oppose SCE’s “Track 4” proposal.

**CUE Response:** CUE supports SCE’s “Track 4” proposal.

**TURN Response:** As explained above, TURN does not recommend that the Commission require SCE to submit a RAMP submission for 2024 in order to consider SCE’s third attrition year proposal. Instead, TURN recommends that SCE incorporate its attrition proposal for 2024 into Track 1 of this proceeding to allow parties and the Commission to address all three attrition years together in a timely and efficient manner. TURN sees several ways to integrate a third attrition year (3AY) request into Track 1, each of which is described here and presented in a table below.

TURN’s primary recommendation is that SCE supplement its post-test year ratemaking (PTYR) testimony at the same time that it provides supplemental RAMP-related testimony on April 3, 2020. If SCE were to propose to use the *same methodology for 2024* as it has already



proposed for 2022-2023, TURN believes it and other intervenors would be able to respond to all three attrition year proposals together in its intervenor testimony on May 5, 2020, without any further change to the Track 1 schedule. If desirable, the Public Advocates Office could also address PTYR on May 5, along with other intervenors.

On the other hand, if SCE chose to request a *different methodology for 2024* than requested for 2022-2023, TURN would need more time to conduct discovery and assess the reasonableness of that new proposal before preparing testimony. In that case, TURN would propose that intervenors be able to address all attrition years together in stand-alone testimony due on June 12, 2020, which is the same date that rebuttal testimony is currently due. Then rebuttal testimony on PTYR could be due two weeks later, on June 26, 2020. Hearings for PTYR could occur during the time set for hearings on Update Testimony, which is August 5, 2020, with two days added to the schedule, August 6-7, 2020.

TURN has also considered a third scenario to provide SCE more time to develop its capital spending budget for 2024, if it intends to propose a budget-based capital attrition mechanism for 2024 (like 2022-2023). If SCE were unable to provide its 2024 capital spending budget with its 3AY attrition proposal on April 3, 2020, SCE could instead provide that budget on June 2, 2020, the due date reserved for SCE's "Wildfire / Infrastructure Replacement Re-Prioritization Proposals and Post Test Year Ratemaking Update (If Necessary)." Providing SCE with this additional time to prepare its 2024 budget to accompany its 2024 attrition proposal would necessitate extending the deadline for intervenor testimony on PTYR. TURN proposes that intervenor PTYR testimony be due on June 22, 2020, with PTYR rebuttal due on July 6, 2020. Hearings would then occur during the time set for hearings on Update Testimony, which is August 5, 2020, with two days added to the schedule, August 6-7, 2020.

These three schedules are presented in the table below.

<b>Event</b>	<b>Schedule 1: SCE proposes same methodology for 3AY</b>	<b>Schedule 2: SCE proposes different methodology for 3AY</b>	<b>Schedule 3: SCE proposes same methodology but needs more time for 2024 capital budget</b>
SCE updates its PTYR Proposal to add 3AY request	4/3/20 (with Supplemental RAMP Testimony)	4/3/20	4/3/20 (3AY proposal other than 2024 capital budget); 6/2/20 (2024 capital budget) (also due date for SCE “Re-Prioritization” Update Testimony)
Intervenors Address SCE’s 2022-2024 PTYR Proposal	5/5/20 (current due date for all Intervenor Direct Testimony)	6/12/20	6/22/20
Concurrent PTYR Rebuttal Testimony	6/12/20 (current due date for all Rebuttal Testimony)	6/26/20	7/6/20
PTYR Evidentiary Hearings	7/6-24/20 (current Evidentiary Hearing dates)	8/5-7/20	8/5-7/20
Update Testimony Hearings	8/5/20	8/5/20	8/5/20
Opening Briefs	9/11/20	9/11/20	9/11/20
Reply Briefs	10/2/20	10/2/20	10/2/20
Track 1 Proposed Decision	Q4 2020 / Q1 2021	Q4 2020 / Q1 2021	Q4 2020 / Q1 2021

TURN opposes deferring resolution of SCE’s 3AY to a later Track in this proceeding. Such staggering would put intervenors in the position of litigating PTYR twice for SCE *in the same GRC*, an inefficient and burdensome proposition. Moreover, deferring consideration of SCE’s third attrition year proposal would require intervenors to litigate that request at the same time as they would be litigating other GRC applications under the schedule set forth in D.20-01-002.

As required by D.20-01-002, PG&E will file its Test Year 2023 GRC by June 2021, SDG&E and SoCalGas will file their Test Year 2024 GRCs by May 15, 2022, and SCE will file its Test Year 2025 GRC by May 15, 2023.<sup>10</sup> The multi-track schedule in this GRC already places intervenors in the position of litigating the reasonableness of SCE's 2020 Wildfire Mitigation Memorandum Account balances at the same time as they are analyzing and preparing testimony on PG&E's TY 2023 GRC request.<sup>11</sup> Further increasing the overlap between this GRC and future GRCs by extending consideration of the third attrition year into a later track would only serve to further burden intervenors, especially small intervenors like TURN that are active in all major utility GRCs. TURN submits that this outcome would undercut the Commission's aim in D.20-01-002 to modify the Rate Case Plan to "enable GRC proceedings to be conducted more efficiently."<sup>12</sup>

Indeed, the Commission in D.20-01-002 expressly contemplated that "implementing the requirements in Section 5.4 of this decision for additional attrition years for Sempra and SCE will require prioritizing Staff and party resources *in the near term*."<sup>13</sup> For that reason, the Commission extended the time period for Staff and interested parties to conduct the workshops required in D.20-01-002 from 6 months, as specified in the Proposed Decision, to "within the next 12 months."<sup>14</sup>

TURN recognizes that the workshops required by D.20-01-002 will address the possibility of formula-based attrition year revenue requirements, such as standardizing

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<sup>10</sup> D.20-01-002, Appendix B.

<sup>11</sup> The Track 3 schedule includes intervenor testimony in July 2021, evidentiary hearings in September 2021, and briefs in October and November 2021. *Assigned Commissioner's Scoping Memo and Ruling*, p. 10. Intervenors will be conducting discovery and preparing testimony in PG&E's TY 2023 GRC at the same time, as intervenor testimony is due on December 15, 2021. D.20-01-002, Appendix A.

<sup>12</sup> D.20-01-002, Conclusion of Law 2 ("The RCP should be modified if it will enable GRC proceedings to be conducted more efficiently.").

<sup>13</sup> D.20-01-002, p. 71 (emphasis added).

<sup>14</sup> D.20-01-002, p. 71 and Ordering Paragraph 5. *Compare with Proposed Decision, Rev. 2, Redline*, p. 70 and Ordering Paragraph 7.

escalation-based attrition year adjustments, and other PTYR mechanisms and reporting requirements that might be necessitated by the move to a four-year GRC cycle.<sup>15</sup> However, there is no guarantee that the Commission will adopt changes to its policies regarding PTYR in a timeframe that would impact PTYR in this GRC. The Commission adopted a “compliance item” in D.20-01-002, wherein a designated utility must submit a report to Staff and the service list within 30 days of the conclusion of the workshop or workshops.<sup>16</sup> The Commission has not specified any additional process for considering the proposals emerging from the workshop process, nor is there a current forum in which to do so. The Commission closed R.13-11-006 in D.20-01-002.<sup>17</sup> Delaying the processing of SCE’s forthcoming 3AY proposal until some inconvenient point in the future, with the hope that the Commission might have adopted new PTYR policies by then, makes little sense under the circumstances here.

For all of these reasons, TURN recommends that the Commission integrate the consideration of SCE’s 3AY proposal into Track 1 of this GRC, using one of the schedules suggested by TURN above.

- **Other topics as the interest of justice and efficient case management require.**

**SCE Response:** SCE does not have any additional topics to propose at this juncture.

**TURN Response:** If the Commission determines more information or discussion is necessary regarding the process to address SCE’s third attrition year proposal, TURN

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<sup>15</sup> D.20-01-002, pp. 64, 70-71.

<sup>16</sup> D.20-01-002, Ordering Paragraph 5.

<sup>17</sup> D.20-01-002, Ordering Paragraph 7.

recommends that the Commission schedule a prehearing conference or all-party meeting to discuss this issue.

Respectfully submitted,

FADIA RAFEEDIE KHOURY  
KRIS G. VYAS  
RUSSELL A. ARCHER

*/s/ Kris G. Vyas*

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By: Kris G. Vyas

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6613  
Facsimile: (626) 302-6693  
E-mail: Kris.Vyas@sce.com

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A.19-08-013

**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 **JOINT CASE MANAGEMENT STATEMENT OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), CALIFORNIA PUBLIC ADVOCATES OFFICE, THE UTILITY REFORM NETWORK, ENERGY PRODUCERS AND USERS COALITION, AND COALITION OF CALIFORNIA UTILITY EMPLOYEES** on all parties identified on the attached service list(s) **I.18-11-006 and 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.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by U.S. Mail to the offices of the ALJ(s) or other addressee(s).

**ALJ Eric Wildgrube  
CPUC  
Division of ALJs, Room 5113  
505 Van Ness Avenue  
San Francisco, CA 94102-3214**

Executed on **February 20, 2020**, at Rosemead, California.

*/s/ Regina Coburn*

Regina Coburn

Legal Administrative Assistant, Senior Support

SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue

Post Office Box 800

Rosemead, California 91770



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Public Utilities  
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### Parties

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RACHAEL KOSS  
ADAM BROADWELL JOSEPH & CARDOZO  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: COALITION OF CALIFORNIA UTILITY  
EMPLOYEES

TESSA CARLBERG  
PACIFIC GAS AND ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

KRIS G. VYAS  
SR. ATTORNEY  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE. 3-B / PO BOX 800  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

AMY C. YIP-KIKUGAWA  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4107  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: PUBLIC ADVOCATES OFFICE

THOMAS LONG  
LEGAL DIRECTOR  
THE UTILITY REFORM NETWORK  
785 MARKET ST., STE. 1400  
SAN FRANCISCO, CA 94103  
FOR: TURN

### Information Only

---

MRW & ASSOCIATES LLC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JOAN WEBER  
CALIF PUBLIC UTILITIES COMMISSION  
SAFETY POLICY DIVISION



320 West 4th Street Suite 500  
Los Angeles, CA 90013

LAUREN GODINEZ  
GRC CASE MGR.  
SOUTHERN CALIFORNIA GAS COMPANY  
555 WEST 5TH ST  
LOS ANGELES, CA 90013

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE. / PO BOX 800  
ROSEMEAD, CA 91770

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

ELIZABETH A. PETERS  
REGULATORY CASE MGR.  
SAN DIEGO GAS & ELECTRIC  
8330 CENTURY PARK COURT, CP31E  
SAN DIEGO, CA 92123

JAMIE K. YORK  
2020 COST OF CAPITAL PROGRAM MGR  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP31E  
SAN DIEGO, CA 92123  
FOR: SDG&E COMPANY AND SOUTHERN  
CALIFORNIA GAS COMPANY

ANDREW J. GRAF  
ASSOCIATE ATTORNEY  
ADAMS BROADWELL JOSEPH & CARDOZO  
601 GATEWAY BOULEVARD, SUITE 1000  
SOUTH SAN FRANCISCO, CA 94080

MILES MAURINO  
ASSOCIATE ATTORNEY  
ADAMS BROADWELL JOSEPH & CARDOZO  
601 GATEWAY BLVD., STE. 1000  
SOUTH SAN FRANCISCO, CA 94080

ALAN BACH  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY INFRASTRUCTURE BRANCH  
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

DAVID LIEVANOS  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY SAFETY & INFRASTRUCTURE BRANCH  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ERIC WILDGRUBE  
CALIF PUBLIC UTILITIES COMMISSION  
ADMINISTRATIVE LAW JUDGE DIVISION  
ROOM 5113  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JEREMY BATTIS  
CALIF PUBLIC UTILITIES COMMISSION  
SAFETY POLICY DIVISION  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KEVIN FLAHERTY  
CALIF PUBLIC UTILITIES COMMISSION  
MARKET STRUCTURE, COSTS AND NATURAL GAS  
AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

NATHANIEL SKINNER  
CALIF PUBLIC UTILITIES COMMISSION  
SAFETY BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

PUI-WA LI  
CALIF PUBLIC UTILITIES COMMISSION  
SAFETY BRANCH

RICHARD WHITE  
CALIF PUBLIC UTILITIES COMMISSION  
SAFETY POLICY DIVISION

AREA  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

ROOM 5-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

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

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

WENDY AL-MUKDAD  
CALIF PUBLIC UTILITIES COMMISSION  
SAFETY POLICY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DAVID CHENG  
STAFF ATTORNEY  
THE UTILITY REFORM NETWORK  
785 MARKET STREET, STE. 1400  
SAN FRANCISCO, CA 94103

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

CHARLES R. MIDDLEKAUFF  
ATTORNEY  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94105

PAUL SCHULMAN  
SR RESEARCH FELLOW  
CTR FOR CATASTROPHIC RISK MGNT  
MILLS COLLEGE  
UNIVERSITY OF CALIFORNIA  
BERKELEY, CA 94720

PHILLIP MULLER  
PRESIDENT  
SCD ENERGY SOLUTIONS  
436 NOVA ALBION WAY  
SAN RAFAEL, CA 94903

DRUCILLA DUNTON  
CALIF PUBLIC UTILITIES COMMISSION  
ENTERPRISE RISK AND COMPLIANCE OFFICE  
300 Capitol Mall  
Sacramento, CA 95814

FILIBERTO A. PINEDA  
CALIF PUBLIC UTILITIES COMMISSION  
SAFETY POLICY DIVISION  
300 Capitol Mall  
Sacramento, CA 95814

MICHAEL ZELAZO  
CALIF PUBLIC UTILITIES COMMISSION  
MARKET STRUCTURE, COSTS AND NATURAL GAS  
770 L Street, Suite 1250  
Sacramento, CA 95814

ANDREW B. BROWN  
ATTORNEY AT LAW  
ELLISON SCHNEIDER HARRIS & DONLAN LLP  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816-5931

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**PROCEEDING: A1908013 - EDISON - TO INCREASE  
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### Parties

---

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

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

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

FOR: THE UTILITY REFORM NETWORK

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

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

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

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

FOR: SMALL BUSINESS UTILITY ADVOCATES

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

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

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

## Information Only

---

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

CHRISTINE M. WALWYN  
ADMINISTRATIVE LAW JUDGE  
CPUC  
EMAIL ONLY  
EMAIL ONLY, CA 00000

DAVID PECK  
CPUC - EXEC  
EMAIL ONLY  
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

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

REGULATORY CLERK  
BRAUN BLAISING SMITH WYNNE, PC

ROBERT EARLE  
EMAIL ONLY

EMAIL ONLY  
EMAIL ONLY, CA 00000

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

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

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

PAUL HUNT  
207 MANZANITA AVE.  
SIERRA MADRE, CA 91024

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

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

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

KATHERINE L. HERNANDEZ  
CASE ADMIN  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE

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

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

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

ALEXANDER J. ABRAMSON  
CALIF PUBLIC UTILITIES COMMISSION  
BROADBAND, POLICY & ANALYSIS BRANCH  
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

EHREN SEYBERT  
CALIF PUBLIC UTILITIES COMMISSION  
ADMINISTRATIVE LAW JUDGE DIVISION  
ROOM 5041  
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

POUNEH GHAFFARIAN  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5025

ROSEMEAD, CA 91770

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

ADENIKE ADEYEYE  
CALIF PUBLIC UTILITIES COMMISSION  
COMMISSIONER GUZMAN ACEVES  
ROOM 5214  
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

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

ERIC WILDGRUBE  
CALIF PUBLIC UTILITIES COMMISSION  
ADMINISTRATIVE LAW JUDGE DIVISION  
ROOM 5113  
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

PUI-WA LI  
CALIF PUBLIC UTILITIES COMMISSION  
SAFETY BRANCH  
AREA

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

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

MARCEL HAWIGER  
ENERGY ATTORNEY  
THE UTILITY REFORM 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

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

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

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

ALEX J. MORRIS  
VP - POLICY & OPERS  
CALIFORNIA ENERGY STORAGE ALLIANCE  
2150 ALLSTON WAY, STE.400

OAKLAND, CA 94612

BERKELEY, CA 94704

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

DRUCILLA DUNTON  
CALIF PUBLIC UTILITIES COMMISSION  
ENTERPRISE RISK AND COMPLIANCE OFFICE  
300 Capitol Mall  
Sacramento, CA 95814

WILL MAQUIRE  
BRAUN BLAISING SMITH WYNNE, PC (BBSW)  
915 L STREETM SUITE 1480  
SACRAMENTO, CA 95814

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