

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

Order Instituting Rulemaking to Consider
Authorization of a Non-Bypassable Charge
to Support California's Wildfire Fund.

Rulemaking 19-07-017

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON
PROPOSED WILDFIRE FUND NON-BYPASSABLE CHARGE FOR 2020 AND 2021**

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Dated: **August 4, 2020**

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Pursuant to the *Email Ruling Seeking Party Comment on Proposed Wildfire Fund Non-Bypassable Charge for 2020 and 2021* from Administrative Law Judge (“ALJ”) Patrick Doherty dated July 3, 2020 (“July 3 Ruling”) and *Email Ruling Adding 60-Day Notice to the Record* from ALJ Doherty dated July 31, 2020 (“July 31 Ruling”), Southern California Edison Company (“SCE”) respectfully submits these comments on the proposed 2020 and 2021 Wildfire Fund Non-Bypassable Charge (“NBC”). In the 90-Day Notice and 60-Day Notice memorandums attached to the July 3 Ruling and July 31 Ruling, respectively, the California Department of Water Resources (“DWR”) sets forth the information it used to calculate the NBC.¹ SCE agrees with or has no objection² to the information and the calculations that DWR performed to arrive at \$5.80/MWh for 2020 and 2021. SCE also agrees that Investor Owned Utilities (“IOUs”) should

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¹ See 90-Day Notice memorandum at p. 8 and 60-Day Notice memorandum at p. 11.

² SCE notes that the 60-Day and 90-Day Notice memorandums provided inconsistent “Total Load” figures. SCE was also unable to verify the figures as it does not have the sales forecast from the other IOUs and this information was not provided in the memorandums. Notwithstanding this, SCE does not object to the NBC.

start charging customers the NBC on October 1, 2020.³ As such, SCE does not object to the proposed NBC in the 60-Day Notice memorandum.

Respectfully submitted,

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/s/ Gary Y. Chen

By: Gary Y. Chen

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August 4, 2020

³ Although not directly at issue in this proceeding, as noted in a joint-IOU Prehearing Conference Statement submitted on July 23, 2020 in R.15-02-012, SCE believes that the current DWR Bond Charge should cease on September 30, 2020, not September 21, 2020. DWR has since revised its position and now agrees with the September 30, 2020 Bond Charge shut off date. Specifically, in DWR's 60-Day Notice memorandum, DWR now requests that "the CPUC establish a mechanism to direct the IOUs to terminate the imposition of Bond Charges in each IOU service area on or before September 30, 2020." p. 8.

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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 the **COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON PROPOSED WILDFIRE FUND NON-BYPASSABLE CHARGE FOR 2020 AND 2021** on all parties identified on the attached service list for R.19-07-017. Service was effected by transmitting copies via e-mail to ALJ Patrick Doherty and all parties who have provided an e-mail address.

Executed on August 4, 2020, at Los Angeles, California.

/s/ Olivia Gutierrez

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[TOP OF PAGE](#)
[BACK TO INDEX OF SERVICE LISTS](#)