BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Approval of its Residential Rate Design Window Proposals, including to Implement a Residential Default Time-Of-Use Rate along with a Menu of Residential Rate Options, followed by addition of a Fixed Charge Component to Residential Rates (U39E).

Application No. 17-12-011
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(Filed December 20, 2017)

SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) REPLY TO PROTESTS OF, AND RESPONSE TO, ITS APPLICATION REQUESTING AUTHORIZATION TO IMPLEMENT RESIDENTIAL DEFAULT TIME-OF-USE RATES AND INCREASE FIXED CHARGES

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Dated: February 1, 2018
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I.
INTRODUCTION

Pursuant to Rule 2.6(e) of the California Public Utilities Commission’s (Commission’s or CPUC’s) Rules of Practice and Procedure, Southern California Edison Company (SCE) hereby submits this reply to the protests of the Office of Ratepayer Advocates (ORA), The Utility Reform Network (TURN), the Environmental Defense Fund (EDF), and the California Choice Energy Authority (CCEA)—and to the response of the Center for Accessible Technology (CforAT)—to SCE’s 2018 residential rate design window (RDW) application requesting
authorization to implement residential default time-of-use rates and increase fixed charges (“Application”). This reply focuses on issues relating to the scope and schedule of the consolidated proceeding, with the understanding that the joint prehearing conference (PHC) statement due February 9, 2018 will address similar issues in more detail after SCE and other parties have had the benefit of discussions at the required meet-and-confer.

II.

SCE’S REPLY TO PROTESTS AND RESPONSE

A. Issues Within Scope

SCE agrees with ORA’s list of SCE-specific issues within scope, both with respect to rate design and implementation matters.1 However, rather than determining whether the proposed default TOU rates would have “minimal bill impacts for the majority of customers,” the scoping memo should broadly identify the issue as whether the proposed default TOU rates are reasonable, which would include consideration of the bill impacts on customers who are subject to SCE’s rate proposals. SCE also agrees with ORA’s list of common issues across the IOUs’ applications in this consolidated proceeding.2 SCE anticipates that the joint PHC statement will identify issues specific to each IOU’s application so that the ALJs may refer to it in drafting the Scoping Memo.

SCE disagrees with EDF that Energy Savings Assistance (ESA) measures for low-income customers in hot climate zones are within scope,3 given that SCE proposes to exclude

1 ORA Protest, p. 1-3. Unless specified, the references cited herein are to protests of SCE’s application only.
2 However, the second bullet should be modified as follows: “Should the default TOU and the then-current default tiered rate include a fixed charge component?” ORA Protest, p. 3.
3 EDF Protest, p. 5.
these customers from default TOU rates and given that low-income energy savings measures will be addressed in other proceedings including the low-income and demand response proceedings.\footnote{D.17-09-036, Ordering Paragraph (OP) 2 states “Southern California Edison Company (SCE) shall exclude California Alternate Rates for Energy and Family Electric Rate Assistance eligible customers in climate zones 10, 13, 14 and 15 from the default time-of-use pilot. Unless additional data and analysis in a formal Commission proceeding, such as SCE’s 2018 rate design window, demonstrate good cause for change, these exclusions shall also apply to default time-of-use rates.” SCE proposes in its RDW to exclude CARE and FERA-eligible customers located in its hot climate zones 10, 13, 14 and 15 from the default TOU transition.}

Moreover, it would be over-ambitious to include within the scope of SCE’s RDW application—already crowded with seasonal tiered rates, default TOU and fixed charge issues—a mandate to propose dynamic optional rates that incentivize distributed energy resources.

**B. Timeline for Implementing Default TOU**

CforAT and TURN propose that the three IOUs collectively begin default TOU on a uniform start date in 2020, which would coincide with the start of SCE’s proposed timeline for its own customers’ migration, which, in large part, is due to the timing and duration of the SCE-specific installation and stabilization of a new customer billing platform. Although the October 2020 implementation works for SCE, the Commission should not ignore other IOU-specific constraints when determining the appropriate timing of default TOU and whether a uniform implementation date is needed. Additionally, although currently not anticipated, there is always the possibility that SCE’s proposed/preferred implementation schedule could be jeopardized if the re-platform effort is delayed.\footnote{See SCE-01, p. 120.} Although SCE understands the benefit to litigating common issues in one forum, which will conserve parties’ and the Commission’s resources, that could easily be done without forcing the same TOU rollout date across the state, particularly to the extent that PG&E and SCE can learn from the earlier transition of SDG&E’s customers.
C. **Marketing Education and Outreach (ME&O)**

TURN states that SCE’s supporting testimony did not include sufficient detail concerning SCE’s rate conversation scripts. SCE’s testimony offers a general overview of sample call center scripts\(\text{\footnote{A.17-12-012, SCE-01, p. 103. SCE notes that the IOUs also provide draft communications in their quarterly Progress Reports on Residential Rate Reform (PRRRs) filed in R.12-06-013.}}\) that were used in the 2017 new customer engagement pilot, and these scripts will be refined upon receipt of default TOU pilot survey results and input from the ME&O working group, where SCE hopes TURN will begin to take a more active role. SCE may also choose to conduct additional studies in 2018 to further refine and test call scripts. SCE agrees to serve supplemental customer outreach-related testimony in July 2018 that has the benefit of data drawn from these sources.

D. **Fixed Charge Issues**

1. **Composite Tier Ratio**

The Commission should reject TURN’s request to have SDG&E refile its application to eliminate challenges to the composite tier rate ratio set in D.15-07-001.\(\text{\footnote{\footnote{TURN implies that SDG&E alone raised challenges to the composite tier rate ratio. That is not true. See SCE-02, pp. 4-5, n. 6.}}}\) SCE acknowledges that the question whether California law could reasonably be read to require that fixed charge revenues be used exclusively to reduce Tier 1 rates was litigated in Phase 1 of R.12-06-013. That, alone, would not preclude reconsideration of the issue in a future proceeding, particularly when the statute on which TURN relies, Public Utilities Code Section 739.9, does not mandate that fixed charge revenues be considered when assessing inclining block volumetric rates. Moreover, the legal conclusions reached in D.15-07-001 did not establish a prescribed composite tier ratio that would be reasonable under all future circumstances for an optional tiered rate schedule when default TOU rates are being considered. While the Commission adopted a 25% composite tier 1 ratio for the state’s large electric IOUs in 2015, the Commission has...
adopted (in some cases based on settlements utilities reached with TURN and ORA) composite tier ratios much lower than that for electric IOUs (Liberty Utilities and PacifiCorp) and for Southern California Gas Company. In addition, TURN ignores the fact that the ratio of SDG&E’s Tier 2 to Tier 1 rate currently far exceeds the glidepath target for 2018. As properly noted by SDG&E, the composite Tier 1 requirement will actually increase that ratio with the addition of a fixed charge, contrary to cost-based pricing principles, because all of the revenues collected from the proposed fixed charges must be applied to reduce the Tier 1 volumetric rate pursuant to D.15-07-001. That clearly suggests that proposals for downward adjustments to the previously adopted 25% composite tier ratio should be in scope.

2. **Impact of Tax Reform on Fixed Charge Levels**

TURN urges the Commission to delay consideration of all fixed charge proposals until after the utilities provide updated calculations incorporating the impacts of federal tax reform legislation. No such delay is required, as SCE commits to serving supplemental testimony with updated fixed charge calculations as soon as April or May 2018. Parties need not wait until then to begin evaluating, even through discovery, SCE’s fixed charge proposal. Moreover, the anticipated effect of corporate tax reform is a modest net decrease in the magnitude of SCE’s proposed fixed charge which will slightly diminish the expected bill impacts of SCE’s proposed fixed charge (whether such impacts are positive or negative) on customers. Finally, SCE can always update its fixed charge numbers closer to the time of implementation using the then-current adopted marginal costs and revenue requirement; this phase of the proceeding should not be held hostage because of the always-true fact that a revised revenue requirement or refined marginal costs are on the horizon.

E. **Seasonally Differentiated Tiered Rates**

TURN states that it intends to evaluate whether SCE’s proposal to seasonally differentiate its tiered “should be considered in this proceeding or delayed to another rate design
proceeding.”

SCE believes this issue should be considered in this proceeding. In D.15-07-001, the Commission directed SCE to “explore seasonally differentiated rates for the future, to be proposed in the next applicable GRC Phase 2 or [this] RDW.”

As described in SCE’s testimony, there are beneficial bill impacts associated with SCE’s proposed implementation date for seasonal tiered rates relative to the timing of default TOU rates. These effects should be examined and coordinated in this proceeding so that the timing of seasonal tiered rates complements implementation of default TOU rates.

F. **CCA Issues**

1. **Roll-Out Schedule**

CCA registers a concern with SCE’s proposal to potentially roll out all of its CCA customers to default TOU within a one-month time period, noting that the compressed timeline may overwhelm the CCAs’ call centers.

SCE looks forward to exploring approaches to these logistical issues in more detail with the CCAs to minimize potential disruption to their operations while accommodating SCE’s roll-out needs.

2. **Cost Allocation**

CCA also challenges SCE’s proposal to recover default TOU-related costs through distribution rates. SCE is recording incremental costs for default TOU implementation in its Residential Rate Implementation Memorandum Account (RRIMA) and will seek recovery

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8 TURN Protest, p. 11.
9 D.15-07-001, p. 121.
10 CCEA Protest, p. 2.
11 CCEA states that “[i]n Resolution E-4847, which approved SCE’s Residential TOU Pilot, the Commission determined that [this] Rate Design Window application is the proceeding in which parties may address SCE’s proposed cost allocation methodology for costs associated with the default TOU rollout.” This gives the impression that the Commission pre-determined that cost allocation would be in scope here. To the contrary, the Resolution simply stated that while that issue was outside the scope of the TOU pilot resolution, “Lancaster may raise its concerns” in SCE’s RDW, which it has done in its protest.
of those dollars annually in the ERRA Review proceeding should its pending General Rate Case (GRC) Phase 1 cost recovery proposal be adopted.\textsuperscript{12} Regardless of the forum where the issue of cost allocation is appropriately addressed, it is reasonable on the merits for SCE to recover default TOU costs in its distribution rates for a number of reasons. First, as the Commission has already recognized in the TOU pilot context, lessons learned from the transition to TOU “will be useful and beneficial to all electric service providers and therefore it is reasonable to allocate default pilot costs to all customers, including CCA customers.”\textsuperscript{13} SCE’s supporting testimony clearly states that existing CCA customers may participate in default TOU provided that they meet the requisite eligibility criteria. As the Commission has determined in analogous contexts in the past, it is appropriate to assign the costs of programs that are open to bundled service and CCA customers to delivery rates even if individual CCA customers elect not to avail themselves of those programs.\textsuperscript{14} Finally, perspective and context matter on this issue. SCE forecasts a total of $112 million for anticipated costs relating to default TOU activities (\textit{e.g.}, one year of statewide ME&O, IT, etc.), with bill protection credits representing the majority of these costs ($63 million). Per Resolution E-4847, SCE will record those bill protection costs by component (generation or distribution) in the Base Revenue Requirement Balancing Account,\textsuperscript{15} so it is an overstatement for CCEA to state that it is “concerned by [SCE’s] proposal to allocate the \textit{entirety} of default TOU costs to the distribution function, with no costs being allocated to the generation function.”\textsuperscript{16}

G. \textbf{Proposed Schedule}

SCE looks forward to the upcoming meet-and-confer to discuss with all parties the straw proposal for a “phased” approach discussed in the January 26, 2018 \textit{Administrative Law Judges’}

\textsuperscript{12} A.16-09-001, Exhibit SCE-25, Vol. 1 at pages 10 – 11.
\textsuperscript{13} Resolution E-4847, p. 25.
\textsuperscript{14} See, \textit{e.g.}, D.14-12-024, p. 48. (“We find it equally reasonable that tariffs and programs, including pilots, available to all customers should be paid for by all customers.”)
\textsuperscript{15} Resolution E-4847, p. 16.
\textsuperscript{16} CCEA Protest, p. 8.
Ruling Setting Prehearing Conference and Requiring Joint Prehearing Conference Statement

(Ruling). At this point, SCE offers the following observations about the schedule in advance of that meeting:

- The Ruling’s anticipated June 2018 deadline to issue a “Phase 1” decision on threshold issues is reasonably depending on what they are. For example, determining the date for when mass migration should begin is reasonable. But determining a standard turn-on rate for new customers for use in 2019 (even before the default rates have been approved) is not reasonable.

- Litigating issues common to all three IOUs will be more efficient for all stakeholders, and will preserve SCE’s rights to the extent SDG&E’s timeline requires early resolution of issues that impact SCE.

- Should the Commission adopt default TOU rates for SCE that are substantially similar to its proposed default TOU rates, a decision issued one year before default TOU migration in October 2020 should give SCE sufficient lead time. If, however, the Commission adopts different TOU periods, a different number of composition of seasons, or new rates in addition to those proposed, the lead time required could be substantially longer because the changes would need to be programmed before the re-platform “system freeze” in 2019.

- The Ruling refers to “Phase 3” for consideration of fixed charge and/or minimum bill proposals, but it does not include a proposed date for issuance of a decision. Consideration of this pressing issue could and should be considered concurrently with the issues tentatively within scope for Phase 2.

- As indicated above, SCE will submit supplemental testimony on the impact of federal law tax changes on SCE’s fixed charge proposals in April-May 2018.

- SCE plans to submit supplemental testimony on ME&O scripts and related issues in or around July 2018.
III.

CONCLUSION

SCE looks forward to the February 21, 2018 prehearing conference (PHC) and will coordinate with interested parties on a joint PHC statement by the deadlines set forth in the Ruling.

Respectfully submitted,

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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 PROTESTS OF, AND RESPONSE TO, ITS APPLICATION REQUESTING AUTHORIZATION TO IMPLEMENT RESIDENTIAL DEFAULT TIME-OF-USE RATES AND INCREASE FIXED CHARGES on all parties identified on the attached service list for A.17-12-011 et al. Service was effected by transmitting copies via email to all parties who have provided an e-mail address, and by placing copies in sealed envelopes and causing such envelopes to be delivered via United States mail with first-class postage prepaid to the offices of the Assigned ALJ(s) or other addressee(s).

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Service Lists

PROCEEDING: A1712011 - PG&E - FOR APPROVAL
FILER: PACIFIC GAS AND ELECTRIC COMPANY
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LAST CHANGED: JANUARY 31, 2018

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