



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

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Order Instituting Rulemaking on the )  
Commission's Own Motion into Combined Heat )  
and Power Pursuant to Assembly Bill 1613. )

Rulemaking 08-06-024  
(Filed June 26, 2008)

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON  
PROPOSED DECISION REGARDING PAY-AS-YOU-SAVE PILOT**

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Dated: December 30, 2010

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

Order Instituting Rulemaking on the Commission’s Own Motion into Combined Heat and Power Pursuant to Assembly Bill 1613.	)	Rulemaking 08-06-024 (Filed June 26, 2008)
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**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON  
PROPOSED DECISION REGARDING PAY-AS-YOU-SAVE PILOT**

Pursuant to Article 14 of the Commission’s Rules of Practice and Procedure, Southern California Edison Company (“SCE”) submits these comments on the Proposed Decision of Commissioner Peevey Regarding the Pay-As-You-Save (“PAYS”) Pilot program for certain Combined Heat and Power (“CHP”) units pursuant to Assembly Bill 1613 (“Proposed Decision”).

SCE supports the Proposed Decision. In particular, SCE agrees that there are significant complexities with establishing and implementing a financing program for CHP units, not the least of which is the apparent applicability of lending laws and financial regulations to any such financing transactions. Further, as noted in the Proposed Decision, several issues concerning program requirements and ratepayer impacts require further consideration before a PAYS Pilot could be established. For these reasons, and those provided in SCE’s comments in response to the May 11, 2010 Ruling, SCE supports the Proposed Decision’s determination not to pursue development of a PAYS Pilot at this time. SCE further supports the process set forth in the Proposed Decision for any party who has an interest in a PAYS Pilot in the future. In particular, SCE supports the requirement that any party interested in establishing a PAYS Pilot provide the Commission with any new facts or issues warranting consideration of a PAYS Pilot, and address the issues set forth in Section 3 of the Proposed Decision.

SCE appreciates the opportunity to provide these comments, and asks the Commission to adopt the Proposed Decision.

Respectfully submitted,

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/s/ AMBER DEAN WYATT

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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 **COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON PROPOSED DECISION REGARDING PAY-AS-YOU-SAVE PILOT** on all parties identified in the attached service list(s). Service was effected by one or more means indicated below:

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Executed this **30<sup>th</sup> day of December, 2010**, at Rosemead, California.

/s/ VERONICA FLORES

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