



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

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In the Matter of the Application of Southern California Edison Company (U 338-E) for Authority to, Among Other Things, Increase Its Authorized Revenues for Electric Service in 2012, And to Reflect That Increase in Rates.

A.10-11-015

(Filed November 23, 2010)

**REPLY OF THE COUNTY OF LOS ANGELES TO RESPONSE OF SOUTHERN CALIFORNIA EDISON TO MOTION FOR PARTY STATUS**

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February 24, 2011

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**1. INTRODUCTION**

Pursuant to Rule 11.1 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, the County of Los Angeles (“LA County” or “the County”) hereby replies to Southern California Edison Company’s (“SCE”) Response to Motions for Party Status Filed by the County of Los Angeles and California Black Chamber of Commerce (“Response”) in the above captioned proceeding.

Specifically LA County requests that the Administrative Law Judge deny SCE’s request to exclude all energy efficiency related issues from A.10-11-015.

**2. BACKGROUND**

Pursuant to the direction of the presiding Administrative Law Judge, LA County filed a Motion for Party Status in response to Application (“A.”)10-11-015 on February 10, 2011 and identified issues that it intended to address in Phase I of SCE’s General Rate Case (“GRC”) proceeding, including, but not limited to, funding for energy efficiency programs made available to LA County.

SCE filed its Response on February 14, 2011. In its Response SCE asserts that energy efficiency issues are outside the scope of the proceeding and that “[a]ll issues related to energy efficiency policies, administration, and programs are examined on a triennial basis through a separate application.”<sup>1</sup>

**3. ENERGY EFFICIENCY RELATED COSTS WERE RAISED BY SCE AND ARE ALREADY WITHIN THE SCOPE OF THE PROCEEDING.**

Contrary to SCE’s assertions in its Response, issues relating to energy efficiency, particularly with respect to administrative costs as they relate to local governments, are within the scope of A.10-11-015. In SCE Exhibit SCE-04, Vol. 3 (“SCE-04, Vol. 3”), tendered in support of SCE’s requests for an increase in authorized revenues for the Customer Service Business Unit, SCE proposes an increase in funding for the Local Public Affairs Functional Group.<sup>2</sup> In support of its request SCE states that Local Public Affairs Regional Managers play a key role in SCE’s energy efficiency efforts by “educating local governments and business customers about energy efficiency programs as well as helping the [Government & Institutions] account representatives connect with local governments regarding increasing their energy efficiency efforts”.<sup>3</sup> SCE also asserts that in 2009, as part of SCE’s “State of the System Presentation, [Regional Managers] made energy efficiency presentations to all 194 local governments in SCE’s service territory encouraging them to participate in energy efficiency programs and coordinated numerous [Government & Institutions] meetings with regional and local government entities.”<sup>4</sup>

While LA County appreciates and understands that the bulk of energy efficiency related issues are handled in the triennial energy efficiency proceedings, SCE has “opened the door”

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<sup>1</sup> Response, p. 2.

<sup>2</sup> SCE-04, Vol. 3, p. 12, Table II-2.

<sup>3</sup> Id, p. 75.

<sup>4</sup> Id, p. 81.

with respect to funding for administration of energy efficiency programs, especially as it relates to local governments and LA County. LA County intends to question the value of administrative expenditures made for the purpose of "educating" local governments with respect to energy efficiency programs. Furthermore, LA County maintains that any increase in funding for administration would be better spent on actual programs.

**4. CONCLUSION**

For the reasons stated herein, LA County respectfully requests that the Administrative Law Judge deny SCE's request to exclude all energy efficiency related issues from A.10-11-015.

Dated: February 24, 2011

Respectfully submitted,

By:   
Tara S. Kaushik

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**PROOF OF SERVICE**

I, Rita Mehler, declare as follows:

I am employed in the City and County of San Francisco, California. I am over the age of eighteen years and not a party to this action. My business address is MANATT, PHELPS & PHILLIPS, LLP, One Embarcadero Center, 30th Floor, San Francisco, California 94111-3719. On February 24, 2011, I served the within:

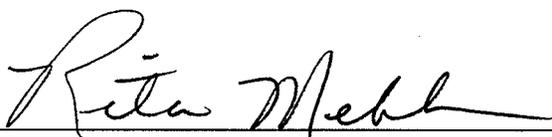
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on the interested parties in this action addressed as follows:

*See attached service list*

- (BY CPUC E-MAIL SERVICE)** By transmitting such document electronically from Manatt, Phelps & Phillips, LLP, San Francisco, California, to the electronic mail addresses listed above. I am readily familiar with the practice of Manatt, Phelps & Phillips, LLP for transmitting documents by electronic mail, said practice being that in the ordinary course of business, such electronic mail is transmitted immediately after such document has been tendered for filing. Said practice also complies with Rule 2.3(b) of the Public Utilities Commission of the State of California and all protocols described therein.
  
- (BY MAIL)** By placing such document(s) in a sealed envelope, with postage thereon fully prepaid for first class mail, for collection and mailing at Manatt, Phelps & Phillips, LLP, San Francisco, California following ordinary business practice. I am readily familiar with the practice at Manatt, Phelps & Phillips, LLP for collection and processing of correspondence for mailing with the United States Postal Service, said practice being that in the ordinary course of business, correspondence is deposited in the United States Postal Service the same day as it is placed for collection.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on February 24, 2011, at San Francisco, California.

  
\_\_\_\_\_  
Rita Mehler

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**A.10-11-015**  
**(Updated February 24, 2011)**

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