



**FILED**

8-04-16  
01:40 PM

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

Application of Pacific Gas and Electric Company  
to Revise Its Electric Marginal Costs, Revenue  
Allocation, and Rate Design.

U 39 M

A.16-06-013  
(Filed June 30, 2016)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)**  
**MOTION FOR PARTY STATUS**

FADIA RAFEEDIE KHOURY

Attorney for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6008  
Facsimile: (626) 302-7740  
E-mail: fadia.khoury@sce.com

Dated: **August 4, 2016**

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

Application of Pacific Gas and Electric Company  
to Revise Its Electric Marginal Costs, Revenue  
Allocation, and Rate Design.

A.16-06-013  
(Filed June 30, 2016)

U 39 M

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E)**  
**MOTION FOR PARTY STATUS**

Pursuant to Rule 1.4(a)(4), Southern California Edison Company (SCE) hereby requests permission to become a party to the instant proceeding that will resolve Pacific Gas and Electric Company’s (PG&E’s) Application to Revise its Electric Marginal Costs, Revenue Allocation, and Rate Design, Application No. 16-06-013 (PG&E’s 2017 GRC Phase 2 Application). SCE is an investor-owned utility (IOU) organized and existing under the laws of the State of California. SCE is engaged in the business of generating, transmitting, and distributing electric energy in portions of Central and Southern California.

The California Public Utilities Commission (CPUC or Commission) approved Decision (D.) 15-07-001 in Rulemaking (R.) 12-06-013 on July 3, 2015. That decision defers consideration of whether to adopt new or increased residential fixed charges until four conditions are met.<sup>1</sup> One of those conditions is the issuance of a General Rate Case (GRC) Phase 2 decision “approving categories of fixed costs for consideration of a future fixed charge,”<sup>2</sup> which decision will draw from workshops to be facilitated by the assigned ALJ in the relevant GRC Phase 2, the

---

<sup>1</sup> D.15-07-001, p. 191.

<sup>2</sup> *Id.*, p. 192.

assigned ALJ for R.12-06-013 and the Energy Division, where interested parties will discuss “a consistent methodology for potentially setting fixed charges based on fixed costs identified in each utility’s individual GRC Phase 2.”<sup>3</sup>

D.15-07-001 states that “the determination of which *categories* of costs the Commission determines should be permitted in a fixed charge should be considered precedential” even for utilities who were not applicants in the GRC Phase 2 proceeding where the categories of costs will be adopted.<sup>4</sup> Specifically, D.15-07-001 states that “[t]he GRC Phase 2 applications for the other two IOUs should rely on the findings from the first decision.”<sup>5</sup>

On November 5, 2015, Administrative Law Judge (“ALJ”) Roscow issued a Ruling designating PG&E’s GRC Phase 2 proceeding as the proper proceeding to include within its scope the workshop process directed in D.15-07-001 to consider and develop a record to support a Commission decision adopting categories of fixed charges.<sup>6</sup> Accordingly, PG&E’s GRC Phase 2 application devotes one chapter to addressing the categories of fixed costs that would make up a residential fixed charge.<sup>7</sup>

Rule 1.4(b)(2) requires that the entity seeking party status shall “state the factual and legal contentions that the person intends to make and show that the contentions will be reasonably pertinent to the issues already presented.” SCE is interested in, and will be potentially impacted by, any Commission decision setting policy, interpreting the law, or determining methodologies for increasing or adopting residential fixed charges and/or minimum

---

<sup>3</sup> *Id.*

<sup>4</sup> *Id.* (emphasis in original).

<sup>5</sup> *Id.*

<sup>6</sup> See A.14-06-014 / A.15-04-012 (Not Consolidated), E-mail Ruling Directing That PG&E’s Upcoming General Rate Case Phase 2 Proceeding Should Include Within Its Scope a Workshop Process Examining Categories of Fixed Charges, issued November 5, 2015, p. 4. SCE notes that San Diego Gas and Electric Company (SDG&E) filed its GRC Phase 2 application (A.15-04-012) before D.15-07-001 was issued. In addition, Conclusion of Law #20 of the Decision clarifies that R.12-06-013 is probably the relevant proceeding for precedent-setting: “As part of their next GRC Phase 2 (or, in the case of SDG&E, the currently pending GRC), each utility may submit testimony identifying and calculating marginal customer costs.” D.15-07-001 at p. 328.

<sup>7</sup> See Exhibit PG&E-2, Appendix F, “Fixed Cost Report.”

bills. Thus, SCE wishes to preserve and advance its interests in this proceeding, in which the Commission will be addressing residential fixed charge issues as contemplated by D.15-07-001. PG&E's application identifies, as one issue to be considered, whether "PG&E's proposed methodology for a potential future residential fixed charge [is] reasonable[.]"<sup>8</sup> SCE is interested in being an active party contributing to the resolution of that question and concurs with PG&E's proposed schedule for workshops about fixed charges and a separately issued proposed decision on fixed charge cost components.<sup>9</sup>

The extent of SCE's involvement will be to participate in the workshop process, serve direct and/or rebuttal testimony, and cross-examine witnesses during evidentiary hearings, as may be relevant and applicable, regarding the residential fixed charge (and potentially minimum bill) issues and any methodological issues bearing on the setting of marginal costs or revenue allocation more generally.

SCE's participation will not expand the scope of this proceeding and no party would be prejudiced by the granting of this motion for party status at this stage, before a Scoping Memo has been issued.

For the foregoing reasons, SCE requests that the Commission grant this motion for party status, and that SCE be included as a party on the service list as follows:

Fadia Rafeedie Khoury  
Director and Managing Attorney  
Southern California Edison Company  
2244 Walnut Grove Avenue  
Rosemead, CA 91770  
E-mail: fadia.khoury@sce.com  
Phone: (626) 302-6008

---

<sup>8</sup> PG&E's Phase 2 Application, p. 15.

<sup>9</sup> *Id.*, pp. 18-19.

For Information Only, please include the following on the service list:

Case Administration  
Southern California Edison Company  
2244 Walnut Grove Avenue / P.O. Box 800  
Rosemead, CA 91770  
E-mail: case.admin@sce.com  
Phone: (626) 302-3119

Respectfully submitted,

FADIA RAFEEDIE KHOURY

*/s/ Fadia Khoury*

---

By: Fadia Khoury

Attorney for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6008  
Facsimile: (626) 302-7740  
E-mail: fadia.khoury@sce.com

August 4, 2016