



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

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Order Instituting Rulemaking to Consider Staff )  
Proposal Concerning Revision or Repeal of ) R.15-12-006  
General Orders and Utility Reporting ) (Filed December 03, 2015)  
Requirements. )  
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**SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)  
COMMENTS ON ASSIGNED COMMISSIONER'S SCOPING MEMO AND RULING  
REQUESTING ADDITIONAL COMMENTS ON STAFF PROPOSAL**

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Dated: **September 29, 2016**

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**I**

**INTRODUCTION**

Pursuant to the ASSIGNED COMMISSIONER’S SCOPING MEMO AND RULING REQUESTING ADDITIONAL COMMENTS ON STAFF PROPOSAL, dated September 8, 2016, Southern California Edison Company (SCE) submits these comments.<sup>1</sup>

SCE once again commends the Commission for initiating the Solicitation for Input (SFI) process that led to this Rulemaking and, to the extent they affect SCE, supports its proposed changes to utility reports and General Orders. Commissioner Picker’s September 8 Scoping Memo and Ruling asks for comments on several issues. These comments address the following issues relevant to SCE:

- Item 5, regarding the proposed changes to Advanced Metering Infrastructure (AMI) reports.
- Item 9, regarding Installed Customer Generation.

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<sup>1</sup> The Schedule on page 5 calls for comments to be filed 21 days after mailing of the Scoping Memo, or September 29, 2016.

## II COMMENTS

### A. **Item 5 of Staff Proposal: Advanced Metering Infrastructure Reports**

Item 5 of the Staff Proposal proposes repealing quarterly and annual Advanced Metering Infrastructure (AMI) reports for SCE, PG&E, and SDG&E. As it pertains to SCE, the September 8 Ruling asks for comments on the following questions.

1. **Would adoption of Item 5 modify SCE’s reporting requirements set forth in D.08-09-039? If so, specify which reporting requirement(s) would be affected.**

SCE’s response is “Yes,” Commission adoption of Item 5 would eliminate the requirement for SCE to submit the Edison SmartConnect Demand Response and Energy Conservation Annual Report.

2. **Would adoption of Item 5 affect utility reporting requirements other than those imposed by D.06-07-027, D.07-04-043, or D.08-09-039? If so, specify the relevant reporting requirement and the source of the requirement (e.g., the Commission decision or order that imposed the requirement).**

No, Commission adoption of Item 5 would not affect any other reporting requirements for SCE.

3. **Does PG&E, SDG&E, or SCE provide the Commission with information regarding AMI installations in reports that would remain unaffected by the adoption of Item 5? If so, describe these reports, including the Commission decision or order that imposed the reporting requirement.**

No, SCE does not submit any reports regarding AMI installations. SCE does include metrics on its AMI-enabled demand response and energy conservation programs in its Smart Grid Annual Deployment Plan Update, which is required by the Commission in D.10-06-047 and would remain unaffected by the adoption of Item 5.

**B. Item 9 of Staff Proposal: Quarterly Reports on Installed Customer Generation**

Item 9 of the Staff Proposal would repeal quarterly reports on installed customer generation required of SCE, PG&E, and SDG&E under D.03-04-030 and Resolution E-3831. The Ruling asks whether the Energy Division's approval of SCE Advice Letter 3263-E/E-A renders Item 9 moot. SCE's response is "Yes."

**III  
CONCLUSION**

SCE appreciates the opportunity to submit these comments. SCE supports the OIR's proposed changes to utility reports and General Orders.

Respectfully submitted,

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