



**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)
General Orders and Utility Reporting) R.15-12-006
Requirements.) (Filed December 03, 2015)
_____)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY TO ORA'S
COMMENTS IN RESPONSE TO ASSIGNED COMMISSIONER'S SCOPING MEMO AND
RULING REQUESTING ADDITIONAL COMMENTS ON STAFF PROPOSAL**

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Dated: **October 6, 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 (“Scoping Memo”), Southern California Edison Company (SCE) submits this Reply to the Office of Ratepayer Advocates’ (ORA’s) Comments in response to the Scoping Memo.¹

II.

COMMENTS

In its Comments, ORA states it “believes that the AMI reporting requirements in Decisions (D) D. 06-07-027, D. 07-04-043 and D. 08-09-039 for PG&E, SDG&E and SCE

¹ The Schedule on page 5 calls for comments to be filed 28 days after mailing of the Scoping Memo, or October 6, 2016.

respectively, should be retained and these companies should continue to provide AMI reports to ORA and the Commission's Energy Division. ORA believes these reports are essential to support these three utilities' reporting for critical peak pricing, demand response and energy efficiency programs."² ORA does not explain why it believes these reports "are essential to support ... reporting for critical peak pricing, demand response and energy efficiency programs." However, as SCE stated in its Opening Comments, the information provided in its Edison SmartConnect Demand Response and Energy Conservation Annual Report is also provided in its Smart Grid Annual Deployment Plan Update, as required by D.10-06-047.³ Therefore, reports ORA refers to are redundant and SCE continues to support their elimination.

III.

CONCLUSION

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

² ORA Opening Comments, p. 1.

³ SCE Opening Comments, p. 2.

Respectfully submitted,

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