

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

Agenda ID 15917
RESOLUTION E-4881
September 14, 2017

R E S O L U T I O N

Resolution E-4881. Modifications to Southern California Edison Company (SCE) Net Energy Metering Aggregation (NEMA) Billing Fees Pursuant to Senate Bill (SB) 594 (Wolk, 2012) and Resolution E-4665.

PROPOSED OUTCOME:

- The proposed billing fees in Advice Letter 3351-E-A are adopted herein.
- Within 30 days of the issuance of this Resolution, Southern California Edison Company (SCE) shall file a Tier 1 Advice Letter revising its NEMA tariffs to reflect the changes authorized in this Resolution.

SAFETY CONSIDERATIONS:

- There is no impact on safety.

ESTIMATED COST:

- No additional cost is associated with this Resolution.

By Advice Letter 3351-E-A, Filed on April 21, 2017.

SUMMARY

This Resolution approves Southern California Edison Company (SCE) advice letter (AL) 3551-E-A modifying the billing fees charged to net energy metering aggregation (NEMA) customers, pursuant to Senate Bill (SB) 594 (Wolk, 2012) and Commission Resolution E-4665.

SB 594 directed NEMA customer-generators to pay the utility for the costs incurred by the utility for providing them with NEMA billing services. In Resolution E-4665, the Commission established NEMA billing fees and permitted

each IOU to file a Tier 3 advice letter proposing modifications to the billing service fees after one year from the effective date of the NEMA tariff.

This Resolution approves SCE's requests in AL 3351-E-A to adjust NEMA billing fees for manually billed customers and establish fees for NEMA customers that are automatically billed. Specifically, the Commission approves that SCE 1) adjust the monthly billing fee to \$20 and remove the set-up cap for manually billed NEMA customers, 2) enact a \$2.70 monthly billing fee and \$16 set-up fee with no cap for NEMA customers on automatic billing, and 3) close its current memorandum account. This Resolution also requires that SCE track NEMA automatic billing costs for one year, effective from the date SCE implements its NEMA automated billing system.

BACKGROUND

Pursuant to Public Utilities (PU) Code Section 2827, net energy metering (NEM) customers can use renewable distributed generation (DG) to offset the electricity consumed behind a single onsite meter. Senate Bill (SB) 594¹ (Wolk, 2012) authorized an eligible customer-generator with multiple meters to elect to aggregate the electrical load of the meters located on the property where the generation facility is located, and on all property adjacent or contiguous to the property on which the generation facility is located, if those properties are solely owned, leased, or rented by the eligible customer-generator. This arrangement is referred to as net energy metering aggregation (NEMA).

SB 594 also directed NEMA customer-generators to pay the utility for the costs incurred by the utility for providing them with NEMA billing services. PU Code Section 2827(4)(H) states:

Notwithstanding subdivision (g), an eligible customer-generator electing to aggregate the electrical load of multiple meters pursuant to this subdivision shall remit service charges for the cost of providing billing services to the electric utility that provides service to the meters.

In Resolution E-4665, the California Public Utilities Commission (Commission) approved the following billing service fee structure for NEMA customers:

¹ Approved by Governor September 27, 2012. Filed with Secretary of State September 27, 2012.

- Account Set-up Fee: Not to exceed \$25 per account (capped at \$500 per NEMA arrangement), and
- Monthly Billing fee: Not to exceed \$5 per account

The Commission also provided the following additional guidance to the three large investor owned utilities (IOUs):

- Track costs for NEMA billing via a memorandum account for one year from the effective date of the NEMA tariff, including the costs of automating the NEMA billing system if such automation is more cost-effective for NEMA customers than manual billing.
- After one year from the effective date of the NEMA tariff, each IOU may file a Tier 3 advice letter proposing modifications to the billing service fees and must include detailed justification for the proposed fees. Should the fee structure change, existing customers shall not be retroactively charged or debited and the new fees shall apply to all NEMA customers (new and existing) on a going forward basis.
- If the costs are significantly higher, each IOU should consider spreading cost recovery of any fees over a reasonable period of time to ensure that customers do not face an upfront cost hurdle that acts as a barrier to participation in NEMA.
- In the event of over-collection, each IOU may provide a refund to NEMA customers for the amount of over-collection.

On July 21, 2014, SCE filed AL 3082-E to comply with Resolution E-4665 and implement its NEMA tariff. SCE was originally scheduled to file the Tier 3 AL proposing modifications to the NEMA billing service charges on July 21, 2015. SCE requested a 6-month extension so that all costs associated with billing NEMA customers through a full 12-month Relevant Period² could be recorded and reflect any efficiencies achieved as SCE gained more experience billing

² Relevant Period is defined as a 12-month period, or portion thereof, which commences on the date NEMA customers interconnect their generator to SCE's electric system, or begin receiving service if already interconnected. The Relevant Period re-starts on every subsequent anniversary. The initial Relevant Period of an account added to a NEMA arrangement during an ongoing Relevant Period may be less than 12 months to align with the other accounts in the arrangement.

NEMA customers. This request was approved by the Commission's Executive Director, and the new filing date became January 21, 2016.

On January 21, 2016, SCE filed Tier 3 AL 3351-E in compliance with Resolution E-4665. In this AL, SCE requested to increase manual billing service charges for NEMA customers and to withdraw the memorandum account used to track those costs. SCE stated that the NEMA billing fees authorized in Resolution E-4665 resulted in an under-collection of actual billing costs by \$33,351 over a 15-month period.

In its AL, SCE proposed to keep the one-time NEMA billing set-up fee of \$25 per account, capped at \$500 per arrangement, and to increase the monthly billing fee from \$5 per account to \$15 per account. SCE proposed the increased fees would apply to new and existing NEMA customers on a going forward basis only.

On February 10, 2016, three parties filed timely protests. SCE responded to the protests on February 18, 2016. These protests and SCE's reply are discussed in the protests section below.

On April 21, 2017, SCE filed supplemental AL 3351-E-A. AL 3351-E-A replaced AL 3351-E in its entirety, and included adjusted set-up and monthly NEMA billing fees to reflect its decision to automate its NEMA billing system beginning in October 2017. No protests were filed.

NOTICE

Notices of ALs 3351-E/-E-A were made by publication in the Commission's Daily Calendar. SCE states that copies of the Advice Letters were mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

Three parties filed timely protests to AL 3351-E on February 10, 2016: the Solar Energy Industries Association and California Solar Energy Industries Association (the Joint Parties), the Agricultural Energy Consumers Association (AECA), and the California Farm Bureau Federation (Farm Bureau).

SCE filed a timely reply to the protests on February 18, 2016.

The Joint Parties protested the AL on the grounds that SCE had not adequately demonstrated that the costs underlying the proposed increase were just and reasonable, and that SCE did not consider spreading the fee increase over time, as directed by Resolution E-4665. The Joint Parties also stated that there was no evidence that SCE assessed whether it would be more cost effective to automate its billing rather than continue with manual billing, as was required by Resolution E-4665. They also argued that NEMA customers should not have to bear the economic burden of SCE's decision not to automate its billing system.

AECA objected to SCE's proposed increased monthly billing fee, citing a lack of information to justify the increase. In alignment with the Joint Solar Parties, AECA stated that SCE provided no information on whether automating billing would be more cost effective than manual billing. AECA also questioned why SCE did not assess if billing efficiencies could be gained going forward.

The Farm Bureau similarly objected to an increased billing fee on the basis that SCE failed to provide adequate information to warrant the increase and did not consider future billing automation. The Farm Bureau probed the methodology used by SCE to justify a cost increase, raising questions about the assignment of customers into "complex" and "simple" billing categories and the multipliers used to estimate the labor incurred.

In its reply, SCE defended its proposed monthly billing fee increase and manual billing structure as both cost-based and reasonable. SCE noted that its billing analysis was based on actual incurred and tracked costs over the course of a 15-month period, adhering to direction in Resolution E-4665.

On April 21, 2017, SCE filed supplemental AL 3351-E-A, replacing AL 3351-E completely. No parties protested the supplemental AL. The relief requested in AL 3351-E-A is discussed below.

DISCUSSION

SCE filed ALs 3351-E/E-A to request adjustments to its NEMA billing fees, pursuant to Resolution E-4665. Resolution E-4665 allowed the IOUs to file a Tier 3 AL proposing modifications to billing service fees with detailed justification after tracking costs for NEMA billing via a memorandum account. Resolution E-4665 also directed the IOUs to track the costs of automating the

NEMA billing system, if such automation is more cost-effective for NEMA customers than manual billing.

In the 14 months that passed between SCE's original AL 3351-E and its supplemental AL 3351-E-A, SCE decided to automate its NEMA billing system. SCE plans to automate its NEMA billing system in October 2017, which would allow new NEMA accounts to go on automated billing starting in November 2017.

SCE intends to continue manually billing current customers through the end of their Relevant Periods to avoid the complexity involved with manually billing a portion of the charges and automating the remainder. According to its timeline, the last month a NEMA customer would receive manual billing is around December 2018.

Pursuant to Resolution E-4665, SCE tracked its manual billing costs through a memorandum account over a 29-month period ending March 31, 2017. SCE is seeking to recoup these costs on a going forward basis through a monthly adder to manually billed accounts through December 2018. SCE is also proposing to increase the monthly fee for manually billed accounts, informed by several time studies and actual tracked costs.

Due to the transition between manual and automated billing systems, SCE is also proposing several additional adjustments to its NEMA billing fees going forward. In sum, SCE proposes to:

- 1) Recover the undercollection tracked in its memorandum account through a monthly adder for NEMA customers on manual billing
- 2) Increase monthly fees for NEMA customers on manual billing
- 3) Remove the set-up cap for NEMA customers on manual billing
- 4) Establish set-up fees and monthly billing fees for NEMA customers on automated billing
- 5) Collect the costs of automation through a monthly adder for NEMA customers on automated billing

The following chart captures SCE’s proposed fee adjustments:

Type of NEMA Billing Fee	Proposed Amount	Previous Amount	Details on Proposed Amount
Set-up fee, manual billing	\$25/account, no cap per arrangement	\$25/account, \$500 cap per arrangement	-
Monthly fee, manual billing	\$20/account	\$5/account	Includes \$10 increase + \$5 undercollection adder
Set-up fee, automated billing	\$16/account, no cap per arrangement	n/a	-
Monthly fee, automated billing	\$2.70 per account	n/a	Includes \$2.32 fee + \$0.39 automation adder

Below we discuss the following issues:

- 1) Memorandum Account and Monthly Adder
- 2) Manual Billing Adjustments
- 3) Automated Billing Proposal
- 4) Curtailment of Memorandum Account

Memorandum Account and Monthly Adder

The data tracked in the memorandum account shows an undercollection of \$290,212.18 over a 29-month period ending March 31, 2017. SCE projected its expected undercollection through June 30, 2017, which brings the total amount it is proposing to recover to \$341,212, or \$88 per account. SCE proposes to amortize this total over an 18 month-period ending December 2018 through a \$5 monthly adder (rounded up from \$4.89) to the manual monthly billing fee per NEMA account.

Discussion

Resolution E-4665 directed the IOUs to track costs for NEMA billing via a memorandum account and allowed them to propose modifications to the billing service fees with detailed justification for the proposed fees. Resolution E-4665 specified that if the costs are significantly higher, each IOU should consider spreading cost recovery of any fees over a reasonable period of time to ensure

that customers do not face an upfront cost hurdle that acts as a barrier to participation in NEMA.

SCE has complied with the requirements of Resolution E-4665. In AL 3351-E-A and in responses to our data requests, SCE has provided accounting of its incurred and tracked NEMA billing costs that are informed by detailed labor time studies (explored further below). Its year-over-year increase in undercollection correlates with its growth in NEMA service accounts, which grew 171 percent from 2015 to 2016. SCE's projected undercollection for the second quarter of 2017 is based on its monthly average undercollection from 2016 and the first quarter of 2017, which we find to be a reasonable assumption.

We agree with parties that protested SCE's original AL 3551-E that SCE should have considered implementing the automation of NEMA billing at an earlier date, which would have curbed the costs associated with this memorandum account. However, we are supportive of SCE's decision to automate billing in 2017 and find the \$5 monthly adder to be justified by supporting data and in accordance with Resolution E-4665. SCE's proposal to apply the fees to all NEMA accounts that are manually billed, versus accounts that are automatically billed, reasonably ties the recovery of this undercollection to accounts that incurred the incremental labor costs.

Manual Billing Adjustments

SCE is proposing to make changes to both set-up and monthly billing fees for manually billed NEMA customers. It is 1) requesting to keep the set-up fee at \$25 per account, but remove the \$500 cap per arrangement, and 2) increase the monthly fee from \$5 to \$15 per account. Combined with the \$5 monthly adder for undercollection proposed in the above section, this brings the total requested monthly fee to \$20 per account.

1. Manual set-up fees

According to SCE's time studies, tracked set-up costs for 2016 came to \$42.51 per account. The time incurred to set up NEMA accounts was charged to a senior level bookkeeper. Set-up billing activities include:

- Reviewing and/or modifying each account in a NEMA arrangement to ensure proper metering is in place so that 15-minute interval billing is possible

- Reviewing the billing cycle for each account in a NEMA arrangement to ensure that all accounts are on the same billing cycle, and modifying the billing cycles where necessary
- Adding the necessary profiles, service account-level notes and updating SCE's internal database for each account in the NEMA arrangement to reflect and flag for manual billing
- Creating a customized customer spreadsheet and NEMA usage calculator with all billing components for each account in the NEMA arrangement, at the 15-minute interval level
- Adding the \$25 per account set-up fee and ensuring that any set-up fees are capped at \$500 per arrangement

Rather than requesting to increase set-up fees to \$42.51, SCE has proposed to retain the current \$25 set-up fee per account and instead remove the \$500 cap per arrangement. SCE states that removing the cap reduces subsidization of arrangements with a large number of accounts by other customers, and eliminates the need to raise the set-up fee for all customers.

2. Manual monthly fees

SCE concluded that monthly fees came to \$16.94 per account based on time studies of actual tracked labor associated with monthly billing in 2016. Monthly billing activities include:

- Entering all consumption and generation data for each NEMA account into the NEMA usage allocation calculator
- Transferring this data to the NEMA calculation spreadsheet to compute each account's charges and credits
- Copying and pasting this information onto the spreadsheet that is sent to the customer along with his/her monthly bill (which is manually reviewed for accuracy before sending), which also requires manual adjustments to the customer's regular billing statement to reflect what is shown on the spreadsheet
- Adding the \$5 per account monthly billing fee

- At the end of the Relevant Period, performing a true-up of each account's energy charges and credits, comparing kilowatt-hours imported to exported
- Calculating and applying net surplus compensation for net surplus generators
- Manually putting all applicable NEMA accounts on review each week
- Performing billing exceptions and rebilling

To determine the monthly fees per account, SCE applied a simple/complex weighted average split (72/28) to its accounts to best determine actual labor incurred. SCE's goal was to demonstrate the incremental cost per account, meaning how much manually billing a NEMA customer per month exceeds billing a NEM customer per month. According to SCE, NEM automated monthly billing is \$0.31 per account, which brings the incremental cost of billing a NEMA account down to \$16.63 from \$16.94.

Given efficiencies gained over time for bookkeepers billing NEMA customers, SCE proposes to round down the monthly fee to \$15 per account. Combined with the monthly undercollection adder, this results in a total proposed monthly billing fee of \$20 per account.

Discussion

The Commission agrees with SCE's proposal to revise the set-up cap to minimize cost shifting between NEMA customers with a large number of accounts to those with a small number of accounts. We believe that the removal of the set-up cap, rather than an increase in the set-up fee, will avoid creating up-front hurdles for a large majority of participants, a consideration required by Resolution E-4665.

A NEMA customer must pay \$25 per account for up to 20 accounts under the current \$500 cap per arrangement. According to responses to our March 2017 data request, five percent of SCE's interconnected and pending NEMA customers have over 20 accounts, and only 0.6% of interconnected and pending customers have over 40 accounts. The elimination of the set-up cap would ensure that these larger customers are paying fairly for their ability to offset load at more meters, without cost-shifting onto other NEMA customers. We thus approve the request to remove the manual set-up cap.

The Commission also approves the request to increase the manual monthly fee to \$15 per account (which comes to \$20 total with the \$5 undercollection adder). In response to our data request, SCE provided detailed time studies and accounting that demonstrate the financial impact of manual monthly billing. SCE also claims that process improvements have been put in place to increase billing efficiencies in 2016 and 2017, such as consolidating three calculator spreadsheets into one to simplify the bill calculation process.

SCE's decision to automate its NEMA billing system has reduced the long-term impact of a manual monthly fee increase. At maximum, the monthly fee would be in place for 14 months as SCE transitions to automated billing and NEMA customers wrap up their Relevant Period.³ NEMA customers would then transition to the proposed automated monthly billing fee of \$2.70 per account (discussed in the next section).

We are concerned that the temporary monthly billing fee increase of \$5 to \$20 is still consequential for NEMA customers. We thus order SCE to immediately notify NEMA customers of the monthly billing fee increase at the time this Resolution is adopted. SCE will also notify NEMA customers how long they will be charged this fee, and inform them that after their Relevant Period ends, the monthly billing fee will be \$2.70 per account. In this letter, SCE will either provide customers with the specific date their Relevant Period ends, or instructions on how to find it.

Automated Billing Proposal

For NEMA customers that are automatically billed, SCE proposes to enact set-up fees of \$16 per account with no arrangement cap, and a monthly fee of \$2.70 per account.

According to SCE, set-up activities under an automated billing structure are similar to those outlined in the manual billing section. The time spent per accountant is reduced to 30 minutes per account, since the bookkeepers will no longer have to create individual spreadsheets for each account. The cost per account thus drops from \$25 under a manual billing scheme to \$16 under an automated billing scheme. SCE is also proposing that no set-up cap be introduced.

³ A 14-month time period would apply to customers whose Relevant Periods start around October 2017, just before SCE transitions to automated billing.

SCE states that there will still be ongoing monthly fees associated with manual labor under an automated billing structure, which come to \$2.32 per account. SCE cites the following reasons:

- Two percent of NEMA accounts will fail the automated billing process
- Nine percent of NEMA accounts will fall out of the automated usage/data collection process (all accounts in a NEMA arrangement must have usage in order to bill)
- A designated senior bookkeeper will spend 25 percent of his/her time resolving NEMA billing-related issues
- Five percent of NEMA accounts will fall out of the automated billing process due to being served on the Multiple Tariff provisions of the NEM tariff, which require special handling and are not automated in SCE's billing system

In addition to the proposed \$2.32 monthly fee per account, SCE proposes to collect the cost of automating NEMA in its billing system through a monthly adder per account. SCE estimates the cost for automating NEMA in its billing system to be \$650,650. SCE is proposing to amortize this cost over half the average 20-year life of the generating facility, which comes to \$0.39 per month per account. This brings the total monthly fee to \$2.70, rounding down a cent.

Discussion

The Commission approves the request to establish automation set-up fees at \$16 per account. It is logical that SCE would continue to incur labor costs to set up each unique NEMA arrangement in its automated billing system, though at a reduced cost compared to manual billing. We approve set-up fees without a cap on accounts per the same rationale noted in the manual billing discussion.

We find the monthly base fee of \$2.32 to be prudent and reasonable. We order SCE to track automated NEMA billing costs for one year from the date SCE implements its automated billing system to confirm these costs are justified, which we discuss in the next section.

SCE's estimated cost to automate its billing system is consistent with its previous efforts to automate. According to responses to our data request, SCE stated that the cost of automating virtual net metering billing was \$632,121. Adjusting for

inflation, and recognizing that NEMA billing differs from virtual net metering billing, the \$650,650 figure appears to be a sensible estimate.

SCE's arrival at a monthly adder of \$0.39 per account is based on how many customers it projects to enroll in NEMA over the next five years, using the second half of 2016 as a baseline. According to SCE, this will bring it close to a saturation point after five years since approximately six percent of SCE customers are eligible for a NEMA tariff. We find these assumptions to be reasonable.

Finally, its decision to amortize this cost over half the average 20-year life of the generating facility adheres to the direction in Resolution E-4665 to spread cost recovery of any fees over a reasonable period of time to ensure that customers do not face an up-front cost hurdle. In its AL, SCE states that it is too risky for non-participating customers to attempt to recover costs over the entire 20-year life of the operating system; SCE avoids proposing exit fees for the NEMA program by opting for a 10-year time period.

Curtailment of Memorandum Account

SCE requests to withdraw its memorandum account and close the process for tracking fees and costs associated with NEMA billing, given it is transitioning to automated billing.

Discussion

SCE complied with the direction in Resolution E-4665 to track costs for NEMA billing via a memorandum account for one year from the effective date of the NEMA tariff, which was later extended for six additional months by the Commission. We allow SCE to withdraw this memorandum account.

There are a number of estimates, however, that are built into SCE's newly proposed fees for automating the NEMA billing process. The Commission thus orders SCE to document and track the following expenses for one year, effective from the date the new automated billing system is implemented:

- Cost of automating the NEMA billing system
- Cost of issuing automated bills, both total and per account

15 months from the date SCE implements its automated NEMA billing system, SCE shall file a Tier 1 advice letter documenting these tracked costs. If tracked costs deviate significantly from the estimates in AL 3351-E/E-A, the Commission may re-consider SCE's NEMA billing fee structure.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day comment period for the draft of this Resolution was neither waived nor reduced. Accordingly, this draft Resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

FINDINGS

1. Senate Bill (SB) 594 (Wolk, 2012) authorized an eligible customer-generator with multiple meters to elect to aggregate the electrical load of the meters located on the property where the generation facility is located, and on all property adjacent or contiguous to the property on which the generation facility is located, if those properties are solely owned, leased, or rented by the eligible customer-generator.
2. SB 594 directed NEMA customer-generators to pay the utility for the costs incurred by the utility for providing them with NEMA billing services.
3. Resolution E-4665 allowed the three large investor owned utilities (IOUs) to track costs for NEMA billing via a memorandum account for one year from the effective date of the NEMA tariff, including the costs of automating the NEMA billing system if such automation is more cost-effective for NEMA customers than manual billing.
4. Resolution E-4665 permitted each IOU to file a Tier 3 advice letter proposing modifications to the billing service fees with detailed justification for the proposed fees. The Commission ordered that existing customers shall not be

retroactively charged or debited, and the new fees shall apply to all NEMA customers (new and existing) on a going forward basis.

5. Resolution E-4665 directed each IOU to consider spreading cost recovery of any fees over a reasonable period of time to ensure that customers do not face an upfront cost hurdle that acts as a barrier to participation in NEMA.
6. SCE plans to automate its NEMA billing system in October 2017, which would allow new NEMA accounts to go on automated billing starting in November 2017. According to SCE's timeline, the last month a NEMA customer would receive manual billing is around December 2018.
7. We find SCE's \$5 monthly undercollection adder for manually billed customers to be justified by supporting data and in accordance with Resolution E-4665.
8. Five percent of SCE's interconnected and pending NEMA customers had over 20 accounts, and 0.6% of interconnected and pending customers had over 40 accounts, as of March 2017.
9. We find that eliminating the set-up fee cap minimizes cost-shifting between NEMA customers with a large number of accounts to those with a small number of accounts.
10. SCE's decision to automate its NEMA billing system has reduced the long-term impact of a manual billing monthly fee increase.
11. It is reasonable that SCE would continue to incur labor costs to set up each unique NEMA arrangement in its automated billing system at a reduced cost compared to manual billing.
12. SCE's estimated cost to automate its NEMA billing system is consistent with its previous effort to automate virtual net metering billing.
13. We find that SCE's proposal to amortize the cost of automating its NEMA billing system over half the average 20-year life of the generating facility adheres to the direction in Resolution E-4665 to spread cost recovery of any fees over a reasonable period of time.

THEREFORE IT IS ORDERED THAT:

1. Southern California Edison Company Advice Letter 3351-E-A is approved.
2. Southern California Edison Company (SCE) shall immediately notify its Net Energy Metering Aggregation (NEMA) customers of the manual monthly billing fee increase from \$5 to \$20 per account. SCE will also notify NEMA customers how long they will be charged this fee, and inform them that after their Relevant Period ends, the monthly billing fee will be \$2.70 per account. In this letter, SCE will either provide customers with the specific date their Relevant Period ends, or instructions on how to find it.
3. Within 30 days of the issuance of this Resolution, Southern California Edison Company shall file a Tier 1 Advice Letter revising its NEMA tariffs to reflect the changes authorized in this Resolution.
4. Southern California Edison Company (SCE) shall track the costs incurred to automate its NEMA billing system and produce automated bills over the course of one year. Within 15 months of the date SCE implements its automated billing system for NEMA customers, SCE shall submit a Tier 1 Advice Letter documenting the tracked costs.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on September 14, 2017 the following Commissioners voting favorably thereon:

TIMOTHY J. SULLIVAN
Executive Director