



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

FILED

12-07-09
04:59 PM

Rulemaking Regarding Whether, or Subject to
What Conditions, the Suspension of Direct
Access May Be Lifted Consistent with Assembly
Bill 1X and Decision 01-09-060.

Rulemaking 07-05-025
(Filed May 24, 2007)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON THE
PRELIMINARY ISSUES IDENTIFIED IN THE ASSIGNED COMMISSIONER'S RULING ON
PROCEDURES TO ADDRESS SENATE BILL 695 ISSUES RELATING TO DIRECT ACCESS
TRANSACTIONS

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Dated: **December 7, 2009**

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STATE OF CALIFORNIA**

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TO DIRECT ACCESS TRANSACTIONS**

Pursuant to Assigned Commissioner's November 18, 2009 Ruling (Ruling) on Procedures to Address Senate Bill (SB) 695 Issues Relating to Direct Access Transactions, Southern California Edison Company (SCE) hereby files its comments on the appropriate scope of issues to be addressed in this sub-phase of Rulemaking (R.) 07-05-025.

The Ruling directs that the scope of this sub-phase shall be "limited only to those issues that must be decided within the initial six-month time limit mandated by SB 695."¹ To that end, the Ruling sets forth a list of issues that have been preliminarily identified as requiring resolution prior to April 11, 2010, when SB 695 is to be implemented, and asks parties to comment on any additions or deletions.

SCE recommends the following three modifications to the preliminary scope set forth in the Ruling:

¹ Ruling, p. 6.

1. *The Commission should not seek to modify the DA switching rules prior to the implementation of the DA provisions of SB 695.* The DA switching rules (specifically, the three-year minimum commitment period and the six-month advanced notice rules identified in the Ruling) do not need to be revisited prior to the partial reopening of DA in April 2010. Any modifications would likely be controversial, and would likely not be resolved prior to April 2010. With respect to the switching rules, this sub-phase should be limited to examining whether a one-time exception to the three-year minimum commitment period is appropriate for the partial reopening of DA in April 2010.

2. *Bond requirements for Energy Service Providers (ESPs) pursuant to Section 394.25(e) of the Public Utilities Code.* The Ruling does not address the requirement set forth in Section 394.25(e) of the Public Utilities (P.U.) Code for a bond for energy service providers (ESPs) to cover costs associated with involuntary returns of DA customers to investor-owned utility (IOU) procurement service. This requirement was enacted as part of the consumer protection provisions of Assembly Bill 117 in 2002, but has yet to be implemented. This requirement needs to be implemented without any further undue delay in order to protect DA and bundled service customers as the legislature intended in enacting P.U. Code Section 394.25(e).

Community choice aggregators (CCAs) have an identical bond requirement under Section 394.25(e), and the Commission has undertaken the matter with respect to CCAs in the CCA Rulemaking (R.03-10-003).² A settlement was reached and filed in June 2009, a hearing was held in October 2009, and the matter has been submitted for a decision. To the extent a decision is issued in the CCA Rulemaking in the next few months, SCE believes this issue could be promptly resolved for ESPs, because

² In May 2008, the Commission opened a new phase of the Community Choice Aggregation (CCA) rulemaking (R.03-10-003) to implement the bond requirement in Section 394.25(e) for CCAs. See *Administrative Law Judge's Ruling Setting Forth Bond Requirement Phase of the Proceeding*, issued May 27, 2008 in R.03-10-003.

the same method for calculating the bond for CCAs should apply to ESPs. Accordingly, the Commission should undertake consideration of the bond requirements for ESPs in this proceeding, and it should be resolved to the extent feasible in this sub-phase.

3. *Identify what requirements remain to be addressed by the Commission in order to ensure that other providers are subject to the same requirements as the IOUs for resource adequacy (RA), renewable portfolio standards (RPS), and electricity sector requirements for global warming solutions (GHG).* The Ruling includes a list of procurement-related requirements that providers of generation service to DA customers must satisfy pursuant to P.U. Code section 365.1(c)(1), including RA, RPS and GHG requirements.³ If these issues have not already been addressed by the Commission, they should be included as part of this sub-phase and resolved to the extent they can be prior to April 2010. To the extent some or all of these issues cannot be resolved by April 2010, the Commission should identify the unresolved procurement-related issues and the proceedings and timeframes in which the Commission intends to address them.

Accordingly, the Ruling's preliminary list of issues should be modified to include an opportunity for parties to identify and comment on the procurement-related requirements.

SCE appreciates this opportunity to provide these comments.

³ See Ruling, p. 3.

Respectfully submitted,

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December 7, 2009

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON THE PRELIMINARY ISSUES IDENTIFIED IN THE ASSIGNED COMMISSIONER'S RULING ON PROCEDURES TO ADDRESS SENATE BILL 695 ISSUES RELATING TO DIRECT ACCESS TRANSACTIONS** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **7th day of December, 2009**, at Rosemead, California.

/s/ Melissa Schary
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