

DRAFT

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

I.D. # 10421

RESOLUTION E-4404

June 23, 2011

R E S O L U T I O N

Resolution E-4404. Southern California Edison (SCE)

PROPOSED OUTCOME: This Resolution approves with modifications SCE's Advice Letter (AL) to clarify access requirements to customer premises under Rules 16 and 21 and related Forms 14-653, 14-788 and 16-340.

ESTIMATED COST: None.

By Advice Letter 2560-E filed on March 2, 2011.

SUMMARY

SCE proposes to modify Rules 16 and 21 and related forms to clarify the access requirements to customers' premises in emergency and non-emergency situations. SCE's current Rule 16 and 21 tariffs provide broad access for SCE personnel to customer premises. The proposed revisions clarifies the access rights of SCE during emergency versus non-emergency conditions, such that SCE will have broad access during emergencies, but shall, where possible, provide notice to Customers for gaining access to customer's premises during non-emergency situations. The requirements for customer notifications, locking devices and handling of unrestrained animals are detailed. This Resolution approves details of the access requirements, with modification, to the abovementioned Rules and related forms. SCE submitted the instant AL in response to an order in Resolution E-4367 (December 2, 2010) which required SCE to clarify emergency and non-emergency access requirements after consultation with the practice of the other utilities.

BACKGROUND

Current Tariff Rules 16 and 21

SCE's current Rules 16 - Service Extensions, Rule 21 - Generating Facility Interconnections and associated agreements (Forms 14-653, 14-788 and 16-340) specify provisions for SCE access to customer premises for reading, inspecting, maintaining, repairing, constructing and testing of utility owned equipment. Rule 16 governs the

process for providing the infrastructure to new customers requesting service. Rule 21 governs the process for interconnecting customer generators to the distribution system.

History

On August 6, 2010, SCE filed Advice 2495-E to modify certain sections of the Net Energy Metering (NEM) and Generating Facility Interconnection Agreement, Form 16-344, to improve and streamline the overall approval process. On August 18, 2010, Solutions For Utilities, Inc. (SFUI) filed a protest to the Advice Letter, to which SCE responded on September 7, 2010. On October 14, 2010, the Commission issued Draft Resolution E-4367 on which SFUI and SCE provided comments. On December 2, 2010, the Commission approved Resolution E-4367, which: 1) approves SCE's request for modifications to the NEM and Generating Facility Interconnection Agreement Form 16-344 and Schedule NEM, as modified in the Energy Division staff analysis; 2) requires SCE to submit the approved modifications in a Supplemental Advice Letter; 3) requires (in Ordering Paragraph 4) for SCE to consult with the other utilities within 90 days to clarify provisions regarding emergency and non-emergency access requirements to Customers' premises; and 4) requires SCE to submit an Advice Letter within 90 days proposing clarifying language to Rules 16 and 21 and associated forms consistent with the changes approved by the Resolution regarding such access requirements to Customers' premises.

On December 14, 2010 SCE submitted AL-2495-E-A incorporating changes the Commission ordered in Resolution E-4367 regarding requirements for assignment of customer generators under Schedule NEM. Changes to the access requirements were not part of the initial SCE Advice Letter 2495-E proposal. After consultation with the other utilities on access requirements, SCE, in compliance with 3) above, is now proposing in the instant AL 2560-E to clarify language for access to Customer' premises. SCE submitted AL 2560-E as Tier 1 filing. SFUI protested this AL because it would not resolve SFUI's original protest to AL 2495-E-A regarding access to Customer premises.

NOTICE

Notice of AL 2560-E was made by publication in the Commission's Daily Calendar. SCE states that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

AL 2560-E was protested in a timely manner by Solutions for Utilities, Inc. (SFUI) on March 4, 2011. SFUI followed up with an "Additional protest" on March 8, 2011. The "Additional Protest" was not related to the instant AL. SCE responded to the initial

protest in time. As explained further below, SCE did not respond to SFUI's "Additional protest" of March 8 because it is outside the scope of the AL.

DISCUSSION

Energy Division has reviewed AL 2560-E, the SFUI protest and SCE's response to the protest.

1. Summary of SCE's proposal in AL 2560-E

In instant AL 2560-E SCE proposes to implement Ordering Paragraph (4) of Resolution E-4367 regarding clarification of the customer premise access requirements as follows:

1.1 Changes to Rule 16 - Service Extensions

1.1.1 Changes to Rule 16, Section A.11, Access to Applicant's Premises:

SCE proposes to modify Rule 16 to insert the terms of emergency and non-emergency, and the Rule would distinguish access rights under the two conditions. Rule 16's definitions section is modified (see below) to define the new terms used in the tariff.

From:

SCE shall at all times have the right to enter and leave Applicant's Premises for any purpose connected with the furnishing of electric service (meter reading, inspection, testing, routine repairs, replacement, maintenance, emergency work, etc.) and the exercise of any and all rights secured to it by law, or under SCE's tariff schedules. These rights include, but are not limited to,

- a. The use of a SCE-approved locking device, if Applicant desires to prevent unauthorized access to SCE's facilities,
- b. Safe and ready access for SCE personnel free from unrestrained animals,
- c. Unobstructed ready access for SCE's vehicles and equipment to install, remove, repair, or maintain its facilities, and
- d. Removal of any and all of its property installed on Applicant's Premises after the termination of service.

To (*new language in italics*):

SCE shall have the right to enter and leave Applicant's Premises for *Non-Emergency* purposes connected with the furnishing of electric service (meter-reading, inspection, testing, routine repairs, replacement, maintenance, etc.). *When necessary, SCE will make prior arrangements with Applicant for gaining access to Applicant's Premises. For Emergency purposes only, SCE may enter Applicant's Premises at all times, without notice to Applicant,*

and may exercise any and all rights secured to it by law, or under SCE's tariff schedules. These rights include, but are not limited to,

- a. The use of a SCE-approved locking device, if Applicant desires to prevent unauthorized access to SCE's facilities,
- b. Safe and ready access for SCE personnel free from unrestrained animals,
- c. Unobstructed ready access for SCE's vehicles and equipment to install, remove, repair, or maintain its facilities, and
- d. Removal of any and all of its property installed on Applicant's Premises after the termination of service.

1.1.2 Changes to Rule 16, Section H, Definitions:

Add (*new language in italics*):

Emergency

Whenever, in SCE's discretion, a condition exists, that, if left uncorrected, could result in harm to personnel, damage to equipment, loss of system integrity, or when any other hazardous condition exists or whenever access is necessary for emergency service restoration, and such immediate action is necessary to protect persons, SCE's facilities or property of others from damage, or due to the failure of protective device to operate properly, or a malfunction of any electrical system equipment or a component part thereof.

Non Emergency

Conditions or situations that are not Emergencies, including but not limited to metering reading, inspection, testing, routine repairs, replacement, and maintenance.

1.2. Changes to Rule 21 - Generating Facility Interconnections

SCE proposes modifying Rule 21 to distinguish between emergency and non-emergency access. SCE also proposes modifying related terms in the definitions section of the tariff.

1.2.1 Changes to Rule 21, Section D.1.d.3 (relating to the visible customer generator disconnect switch location):

From:

Be capable of being reached quickly and conveniently 24 hours a day by SCE personnel for construction, operation, maintenance, inspection, testing or reading, without obstacles or requiring those seeking access to obtain keys, special permission or security clearances.

To *(new in italics)*:

(a) for Emergency purposes be capable of being reached quickly and conveniently 24 hours a day by SCE personnel to isolate the Generating Facility from SCE's Distribution System without obstacles or requiring those seeking access to obtain keys, special permission, or security clearances.

(b) for Non Emergency purposes be capable of being reached during normal business hours. SCE, where possible, will provide notice to Customer for gaining access to Customer's premises.

1.2.2 Changes to Rule 21, Section H, Definitions:

From:

Emergency

An actual or imminent condition or situation, which jeopardizes SCE's Distribution System integrity.

To *(new in italics)*:

Whenever in SCE's discretion an Unsafe Operating Condition or other hazardous condition exists or whenever access is necessary for emergency service restoration, and such immediate action is necessary to protect persons, SCE's facilities or property of others from damage or interference caused by Customer's Generating Facility, or the failure of protective device to operate.

Non Emergency

Conditions or situations that are not Emergencies, including but not limited to metering reading, inspection, testing, routine repairs, replacement, and maintenance.

1.3. Changes to Form 14-693 - Multifamily Affordable Solar Housing Virtual Net Metering and Generating Facility Interconnection Agreement, Section 6; Form 14-788 - Local Government Renewable Energy Self-Generation Bill Credit Transfer Interconnection Agreement, Section 6; Form 16-340 - Interconnection Agreement For Residential Photovoltaic Solar Electric Generating Facilities of 10 Kilowatts or Less, Section 5.

SCE proposes to modify three forms related to Rule 16 and Rule 21 to incorporate the changes to the tariff terms related to emergency and non-emergency access.

From:

SCE may enter Customer's premises at all reasonable hours without notice to Customer for the following purposes to:

- (a) Inspect Customer's protective devices and read or test meter(s); and
- (b) Disconnect the Generating Facility and/or service to Customer, whenever in SCE's sole opinion, a hazardous condition exists and such immediate action is necessary to protect persons, SCE's facilities, or

property of others from damage or interference caused by the Generating Facility, or the absence or failure of properly operating protective devices.

To *(new language in italics)*:

SCE may enter Customer's premises at all times, without notice to Customer for emergency purposes only:

- (a) To inspect Customer's protective devices or *check meter(s) to ascertain there is no power flow; and*
- (b) To disconnect the Generating Facility and/or Service to Customer, whenever in SCE's *discretion*, a hazardous condition exists and such immediate action is necessary to protect persons, SCE's facilities, or property of others from damage or interference caused by the Generating Facility, or the failure of properly operating protective devices. *SCE will make prior arrangements with the Customer for gaining emergency access to Customer's premises by obtaining keys, to a lock box, or a padlock or by making other mutually agreeable arrangements.*

2. Summary of SFUI's Protest

On March 4, 2011, SFUI protested several aspects of AL 2560-E as detailed below.

2.1 SFUI Protest to Rule 16 Language

2.1.1 Protest to Rule 16, Section A.11

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SFUI protests that SCE did not specify the hours of its business as 8:00 AM to 5:00 PM Monday through Friday with regards to entering Applicant's premises for purposes of furnishing electric service (meter reading, inspection, testing, routine repairs, replacement, maintenance, etc.).

SFUI also protests that:

- a) SCE may enter Applicant's premises for Emergencies **without notice** and the locking device had to be approved by SCE if the Applicant desired to prevent unauthorized access to *SCE's facilities (emphasis added)*. **SFUI notes that** their protest to AL 2495-E was with regards to unauthorized access to *Applicant's premises*, AL 2560-E therefore does not properly address the issue.
- b) SCE requires animals to be restrained at all times in case emergency access is required. SFUI suggests contact by cell phone should be required so that the property owner can restrain animals, if necessary.
- c,d) SCE requires unobstructed access for their vehicles at all times. Prior contact and a defined time for removal of obstacles should be given by SCE.

Furthermore, “install, remove and maintain” should not be reasons for emergency access.

2.1.2. Protest to Section H

SFUI protests that documentation should be available to the property owner to prove SCE acted in an emergency. This information should include the nature of the emergency, the equipment involved and the corrections made.

2.2 SFUI Protests to Rule 21 Language

SFUI protests SCE’s proposed Rule 21 language related to access to customer premises and emergency notification.

2.2.1. Protest to Rule 21, Section D.1.d.3

- a) SFUI protests that SCE requires that for emergencies the generator disconnect switch be accessible 24 hrs a day **without obstacles or requiring those seeking access to obtain keys, special permission or security clearance**. SFUI asserts this provision would require property owners to leave their gates and doors unlocked and alarms unarmed at all times.
- b) SFUI protests that “normal business hours” should be defined for non-emergency work because cities do restrict them to 8 AM to 5 PM, Monday through Friday. Prior notification should be required.
- c) SFUI protests that for emergencies SCE requires “unobstructed access for SCE’s vehicles and equipment to install, remove, repair or maintain its facilities...” at all times. This infringes on the property owner’s constitutional right to use the property at all times. Prior notification should be required and a set time to move obstacles in the way to SCE’s meter.

2.2.1. Protest to Rule 21, Section H

SFUI protests the same issues as under Rule 16, Section H above.

2.3 SFUI Protests to Form 14-653, Form 14-788, Form 16-340 Language

SFUI protests SCE’s proposal related to the forms. SFUI asserts that inspection of protective devices is not an emergency and ascertaining that there is no power flow should only be required in an emergency. Records of the emergency should be available to the property owner. Since these forms do provide for prior and mutually agreeable arrangements with property owners for gaining emergency access, the same language should be required in Rule 16.

2.4 SFUI Protest Regarding notification of proposed changes

SFUI's protest requests that all Rule 16 and Rule 21 customers be notified of the changes proposed in AL 2560-E.

2.5 SFUI's Additional Protest of March 8, 2011

SFUI submitted an "Additional protest" to AL 2560-E regarding the proposed revision to Rule 21 because SFUI contends that SCE did not respond to SFUI's comments to draft resolution E-4367. The comments were broad and related to overall problems with Rule 21 that does not allow for interconnection of exporting generators.

3. SCE's Response to SFUI's Protests

3.1 SCE's Response to the Protest of Rule 16 Language

3.1.1 SCE Response regarding Rule 16, Section A.11

SCE responds that SFUI's protest to this section is outside the scope of the original AL-2495-E, which dealt with the NEM agreement. Rule 16 was only changed by SCE in compliance with Resolution E-4367 to clarify emergency access requirements to private property in consistent terms across rules. The rules and tariffs SCE operates under were established to protect the public and demand access to its facilities during emergencies. Rule 16, in contrast to Rule 21, has general applicability for SCE's statutory right to access its equipment of every kind and wherever located under emergency and non-emergency conditions.

3.1.2 SCE Response regarding Rule 16, Definitions language

Emergency access

SCE contends that the changes requested by SFUI would have immediate detrimental implications on public safety and for reliability. The instant notification demanded by SFUI in an emergency would be impractical and time consuming and affect other customers. In reality, SCE employees are trained not to put themselves at risk and when encountering unrestrained animals and blocked access attempt to remedy the situation with the property owner or wait for law enforcement or fire departments to provide the legal authority to create safe access on private property. SCE regards the current language in Rule 16 reasonable and consistent with 125 years of industry best practice. If the Commission determines that the changes to the current language in Rule 16 are unnecessary, SCE will not object its rejection with a determination to maintain the current language.

Non-emergency access

SCE states that SFUI misunderstands Rule 16 as only applying to residential customers for meter reading and inspection of generators. Often SCE conducts routine maintenance and inspections on its facilities with planned outages at night or weekends for the convenience of its customers (residential and commercial). Restricting these activities from 8 AM to 5 PM, Monday through Friday would interrupt businesses, reduce productivity of crews and not take advantage of daylight hours throughout the year.

3.2 SCE's Response to Protest of Rule 21 Language

3.2.1 SCE's Response Regarding Rule 21, Section D.1.d.3

SCE refers to the responses to SFUI's protest to the Rule 16 proposed language and maintains that modifications to it would compromise safety and reliability contrary to law. The restriction to business hours being further defined would not serve customers, depending on their professions and type of business. SCE has already committed in Rule 21 to notify customers when possible in the event of non-emergency access. Bill notifications for non-emergency would be costly and require funding by the Commission. The language is consistent with current practice and functioned well for decades.

3.2.2. SCE's Response Regarding Rule 21, Section H - Definition of Emergency

Inclusion of requirements for SCE to record and provide upon customer's request the nature of the emergency, equipment involved and corrections made is not a tariff issue and may not be raised via protest to an AL. This request is operational in nature and not relevant to the conditions for access during emergencies and non-emergencies.

3.3 SCE's Response to Protest of Forms 14-653, Form 14-788, Form 16-340 Language

Changes to subject forms are identical to changes made to Form 16-344 in compliance with Resolution E-4367. SFUI's protest is therefore without merit.

3.4 SCE's General Comments in Response to SFUI Protest

SCE concludes that the Commission rejects SFUI's protest and approves the clarifying language in AL 2560-E or in the alternate reject AL 2560-E and direct SCE to retain its current tariff language.

4. Analysis and Conclusions

4.1 Review of Rule 16 Issues

4.1.1 Rule 16, Section A.11

The Commission agrees with SCE that the addition of “When necessary, SCE will make prior arrangements with Applicant for gaining access to Applicant’s Premises” for Non-Emergency purposes provides sufficient protection for customers from unwarranted incursions into their private properties by SCE personnel. An Applicant for Service Extension still has the option of negotiating acceptable locking devices for his/her property, which by extension may also become locking devices for SCE equipment within the property, thus requiring SCE approval. For further clarity however SCE should modify Section A.11.a. to read (*new language in italics*):

“The use of a SCE-approved locking device, if Applicant desires to prevent unauthorized access to *his/her property containing SCE facilities*”.

Property owners are free to post warnings of animals and phone numbers to request animal restraint and vehicle access for SCE personnel. This may even save SCE time before asking for public authority assistance. We agree however that SCE should not have to keep a data base of this information or give property owners a certain time to comply in an emergency. There is no consequence stated in the tariff if property owners do not comply, but SCE then will have the right to exercise its rights for access under tariff and law.

We understand that “Prior arrangements with Applicants for access” include notifications by door hangers and mailings, if necessary, which SCE is employing. Utilities do operate 24/7 and need the flexibility to perform their duties without undue inconvenience to customers and for efficiency and when personnel and equipment is available, therefore cannot be limited to certain business hours. We also recognize that Rule 16 has broader applicability than Rule 21. If a customer deems a utility acted improperly there are regulatory and legal avenues to seek redress.

The Commission agrees with SFUI that Section A.11.d should be deleted as an emergency activity because it pertains to termination of service.

The Commission notes that Section A.11.c already includes removal of facilities (for any reason) and recommends relocation of Section A.11.d language to Section A.11.c.

4.1.2 Section H – Definition of Emergency

While SCE may record the nature of the emergency, the equipment involved and the corrections made to abate the emergency, we reject SFUI's request to order SCE to provide these operational details of its equipment. Utilities usually tag faulty customer equipment. Any reporting requirement would not be appropriate in the Definition section. SCE does not need to further modify Section H in response to protest.

4.2 Review of Rule 21 Issues

4.2. Rule 21, Section D.1.d.3) (a)

SCE's proposed language Section D.1.d.3) (b) "for Non-Emergency purpose... SCE, where possible, will provide notice to Customer for gaining access to Customer's premises." already shows a willingness by SCE to use some contact information. Section D.1.d.5) requires signage to the location of the disconnect switch adjacent to the PCC for SCE personnel. In order to further clarify this issue Section D.1.d.3)(a) should be amended to add (*new language in italics*):

"If the switch is not accessible outside the locked premises, signage with contact information and a SCE approved locking device for the premises shall be installed."

Section D.1.d.3) (b)

For the reasons given in the analysis of proposed Rule 16 changes regarding normal business hours, we reject SFUI's request to limit those to 8 AM to 5 PM, Monday through Friday. Notice by SCE prior to accessing locked premises shall be attempted, if practical, to the contact posted by the customer at the SCE approved locking device. SCE does not need to further modify Section D.1.d.3) (b) in response to protest.

4.2.2. Rule 21, Section H –Definition of Emergency

See analysis for Rule 16, Section H above. SCE does not need to further modify Section H in response to protest.

4.3 Review of Form 14-653, Form 14-788, Form 16-340 Issues

The Commission disagrees with SFUI that "To inspect Customer's protective devices ... of a customer-generator is not an emergency action, because faults not interrupted by protective devices could harm utility personnel and equipment, if not other customers. The language "... to check meter(s) to ascertain there is no power flow ..." from a customer generator to the distribution system, is preceded by "... for emergency

purpose only.” Therefore SFUI’s protest is without merit and SCE does not need to further modify the forms in response to protest.

4.4 Review of SFUI’s “Additional Protest” of March 8

SFUI’s “Additional Protest” repeats arguments made on November 21, 2010 in “response” to SCE’s reply comments to Draft Resolution E-4367. SFUI replied to SCE’s reply comments on that resolution. SFUI protests in its “Additional Protest” that SCE did not respond at the time to their November 21st comments in response to SCE’s reply comments on Draft Resolution E-4367.

CPUC General Order (G.O.) 96-B does not require utilities to rebut protesters’ second comments to a utility’s reply comment to a draft resolution. Resolution E-4367, approved by the Commission on December 2, 2010 did include an analysis of SFUI’s second comments filed on November 21, 2010. E-4367 referred to a CPUC staff initiative for possible Rule 21 revision to accommodate exporting customer-generators under various tariffs. A workshop was held on April 29, 2011 on this topic to which SFUI was invited.

SFUI’s “Additional Protest” is out of scope to AL 2560-E, just as it was out of scope to AL 2495-E.

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, the draft resolution was mailed to parties for comments on April 20, 2011.

FINDINGS AND CONCLUSIONS

1. In AL 2560-E, SCE modifies Rules 16, 21 and related forms to provide for utility access to customers’ premises under emergency and non-emergency conditions in accordance with the general direction specified by the Commission in E-4367 (December 10, 2010).
2. SFUI’s protests are without merit and do not require any tariff modification except the clarifications noted below:

- a. SCE should clarify Rule 16 that approved locked devices are to prevent unauthorized access *to his/her property containing SCE facilities.*
 - b. SCE should reword tariff language related to removal of equipment so as to not be duplicative.
 - c. SCE should clarify Rule 21 to include language that allows for posting of signage and locking devices related to access to premises:
"If the switch is not accessible outside the locked premises, signage with contact information and a SCE approved locking device for the premises shall be installed."
3. Utilities are not required to provide customers with operational details of their system malfunctions.
 4. Utilities are not required to notice all customers for proposed modifications to tariff rules.
6. SFUI's "Additional Protest" is out of scope of AL 2560-E, just as it was out of scope of AL 2495-E.
- G.O. 96-B does not require utilities to rebut protesters comments to utilities' reply comments to a draft resolution. Commission approved Resolution E-4367 analyzed SFUI's comments, including unrelated issues.

THEREFORE IT IS ORDERED THAT:

1. SCE's AL 2560-E is approved with the following modifications.
 - Add to Rule 16, Section A.11.a. : *"The use of a SCE-approved locking device, if Applicant desires to prevent unauthorized access to his/her property containing SCE facilities"*.
 - Relocate Rule 16, Section A.11.d to Section A.11.c.
 - Add to Rule 21, Section D.1.d.5): *"If the switch is not accessible outside the locked premises, signage with contact information and a SCE approved locking device for the premises shall be installed."*
2. The above modifications shall be submitted by substitute sheets.

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 June 23, 2011; the following Commissioners voting favorably thereon:

Paul Clanon
Executive Director

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 20, 2011

ID # 10421
Draft Resolution E-4404
June 23 Commission Meeting

TO: PARTIES TO SCE's ADVICE LETTER 2560-E.

Enclosed is draft Resolution E-4404 of the Energy Division addressing Southern California Edison Company's Advice Letter (AL) 2560-E. It will be on the agenda at the June 23, 2011 Commission meeting. The Commission may then vote on this Resolution or it may postpone a vote until later.

When the Commission votes on a draft Resolution, it may adopt all or part of it as written, amend, modify or set it aside and prepare a different Resolution. Only when the Commission acts does the Resolution become binding on the parties.

Parties may submit comments on the draft Resolution no later than Friday, June 10, 2011.

An original and two copies of the comments, with a certificate of service, should be submitted to:

Honesto Gatchalian/Maria Salinas
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
inj@cpuc.ca.gov; mas@cpuc.ca.gov

A copy of the comments should be submitted to:

Werner Blumer
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Fax: 415-703-2200
Email: wmb@cpuc.ca.gov

Those submitting comments must serve a copy of their comments on 1) the entire service list attached to the draft Resolution, 2) all Commissioners, and 3) the Director of the Energy Division, on the same date that the comments are submitted to the Energy Division.

Comments may be submitted electronically.

Comments shall be limited to five pages in length plus a subject index listing the recommended changes to the draft Resolution, a table of authorities and an appendix setting forth the proposed findings and ordering paragraphs.

Comments shall focus on factual, legal or technical errors in the proposed draft Resolution. Comments that merely reargue positions taken in the advice letter or protests will be accorded no weight and are not to be submitted.

Replies to comments on the draft resolution may be filed (i.e., received by the Energy Division) on June 16, 2011, 6 days after comments are filed, and shall be limited to identifying misrepresentations of law or fact in the comments of other parties. Replies shall not exceed five pages in length, and shall be filed and served as set forth above for comments.

Late submitted comments or replies will not be considered.

/s/ Julie Fitch
Julie Fitch
Director
Energy Division

1.1 *Enclosure: Certificate of Service*

CERTIFICATE OF SERVICE

I certify that I have by mail this day served a true copy of Draft Resolution E-4404 on all parties in these filings or their attorneys.

Dated May 20, 2011 at San Francisco, California.

/s/ Honesto Gatchalian

Honesto Gatchalian

NOTICE

Parties should notify the Energy Division, Public Utilities Commission, 505 Van Ness Avenue, Room 4002 San Francisco, CA 94102, of any change of address to ensure that they continue to receive documents. You must indicate the Resolution number on the service list on which your name appears.

Service List for Draft Resolution E-4404 (SCE AL 2560-E)

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Service List R.10-05-004