



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Revisit Net
Energy Metering Tariffs Pursuant to Decision
D.16-01-044, and to Address Other Issues
Related to Net Energy Metering.

R.20-08-020

**JOINT OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY
(U 338-E), PACIFIC GAS AND ELECTRIC COMPANY (U 39-E), AND SAN DIEGO
GAS & ELECTRIC COMPANY (U 902-E) ON ORDER INSTITUTING RULEMAKING
TO REVISIT NET ENERGY METERING TARIFFS PURSUANT TO D.16-01-044, AND
TO ADDRESS OTHER ISSUES RELATED TO NET ENERGY METERING**

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Dated: **October 5, 2020**

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Pursuant to Rule 14.3 of the California Public Utilities Commission (CPUC or Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric Company (SDG&E) (collectively, the Joint IOUs)¹ respectfully file these *Opening Comments on the Proposed Order Instituting Rulemaking (OIR) to Revisit Net Energy Metering (NEM) Tariffs Pursuant to D.16-01-044, and to Address Other Issues Related to NEM.*

I.

INTRODUCTION

The Commission issued the above captioned OIR on September 3, 2020 and asked parties to comment by October 5, 2020. The Commission asked parties to limit their comments on this

¹ Pursuant to Rule 1.8(d) of the Commission's Rules of Practice and Procedure, PG&E and SDG&E have authorized SCE to file and sign these comments on their behalf.

OIR to the “schedule, the issues set forth in the preliminary scoping memo, the anticipated activities in this proceeding”, including whether to amend the issues and how to prioritize the issues to be resolved; how to procedurally address these issues; and the proposed timeline for resolving the issues identified, within the general schedule set forth in the OIR.² For the Commission’s and parties’ convenience, the Joint IOU Comments are organized sequentially by Sections II (Scope), III (Categorization and Hearings) and IV (Schedule) of the OIR.

While still in draft form, the CPUC’s NEM 2.0 Lookback Study demonstrates that the NEM 2.0 tariff raises rates for non-participating customers by overcompensating NEM eligible generators, resulting in an unfair cost shift and exceeding what is required to incentivize them to install systems. Currently, the IOUs estimate that the total statewide costs unfairly borne by non-solar customers is \$2.5 billion annually and, without changes to the underlying tariff, will grow to \$4.4 billion annually by 2030. This results in the costs of maintaining the grid and achieving California’s greenhouse gas (GHG) goals being borne by customers without solar and those least able to afford it.

Affordability issues are particularly important now, as residents of California and particularly lower income residents have been negatively impacted by the Covid-19 pandemic. The Commission should avoid excessive incentives that further exacerbate affordability concerns. The Commission must set an imminent date certain upon which customers can no longer enroll on the existing NEM tariff, replace it as soon as possible with a new successor tariff that supports sustainable solar growth and is equitable for all Californians and reconsider the legacy treatment that is a massive source of the unjust and unreasonable cost shift.

² OIR, p. 11.

II.

THE JOINT IOUS GENERALLY SUPPORT THE COMMISSION’S PROPOSED SCOPE OF ISSUES

The Joint IOUs support the Commission’s preliminary scope, with the exception of the OIR’s (1) inclusion of the RES-BCT and NEMFC tariffs, neither of which are NEM tariffs,³ (2) unclear scoping of consumer protection,⁴ an important issue which should continue to be addressed and refined in this proceeding, and (3) the omission of legacy treatment for NEM 1.0, 2.0, and new successor tariff customers. The Joint IOUs recommend that the Commission include in scope the adoption of guiding principles and impact tests – preferably the Ratepayer Impact Measurement (RIM) test – in the scope of this proceeding.

The Joint IOUs also agree that it is critical to coordinate this Rulemaking with the proceedings identified by the Commission, as well as others, to satisfy the Commission’s and the state’s energy and environmental policy goals, as well as to ensure compliance with AB 327’s mandate as set forth in Section 2827.1 of the Public Utilities Code.

In addition, the Joint IOUs recommend that the Commission segment the proceeding into phases to address related issues, such as incorporating NEM reform into the virtual and aggregation NEM schedules, and consumer protection matters. The Joint IOUs propose phasing because time is of the essence to develop a main successor tariff and establish a date certain for the termination of NEM 2.0. The best use of the Commission’s limited resources is to devote them to the development of the new main successor tariff and the date on which new customer enrollment in NEM 2.0 will terminate. To this end, the Joint IOUs support deferring consideration of all other matters to separate phases. In addition to the toll it will take on the

³ Despite NEMFC’s name, neither RES-BCT nor NEMFC were established by the Legislature in PUC 2827, and thus are not affected by PUC 2827.1. RES-BCT is governed by PUC 2827 and 2830 and NEMFC is governed by 2827.10. Both tariffs credit exports to the grid at the generation component of the energy charge and always have.

⁴ The OIR states “We also expect to address issues related to consumer protection for customer-generators on NEM tariffs in this proceeding” (OIR, p. 3) but the OIR does not include consumer protection among the issues discussed in Section 2.5, “Preliminary Scope”.

Commission, Commission staff, and parties to handle all issues concurrently, addressing all issues simultaneously will likely result in fewer substantive contributions. Phasing the proceeding will allow the Commission to give immediate attention to the issues that contribute most to the growing inequity among customers and issue a final decision on the already ambitious schedule proposed in the OIR, if not the faster one the Joint IOUs propose below.

A. The Commission Should Adopt Guiding Principles in the Scope and Should Use the Joint IOUs' Proposed Guiding Principles to Develop the Successor Tariff

The Joint IOUs' primary concern is the equitable treatment of their customers, especially low- and moderate-income customers. The Commission's draft NEM 2.0 Lookback Study concluded that NEM 2.0, like NEM 1.0 before it, increases rates for non-participating customers. While the draft study did not attempt to estimate the magnitude of this cost shift, the IOUs current estimate is that our nonparticipating customers today are burdened by approximately \$2.5 billion (individually as much as \$200) more on their utility bills on an annual basis. If nothing changes, by 2030, that amount grows to more than \$4.4 billion, or as much as \$310 per customer. As the Commission knows, the customers receiving this subsidy disproportionately represent more economically privileged customers, primarily single-family homeowners⁵. Conversely, many of the non-participants funding this subsidy are low-to-middle income customers that either cannot afford to install rooftop solar or, do not have the ability to do so, or do not want to install solar. A comparison of the NEM subsidy and the California Alternative Rates for Energy (CARE) program highlights this inequity of NEM in the context of redistributive Commission

⁵ The Draft Lookback study found that NEM 1 and 2 customers are higher income and more likely to be homeowners than the general population using zip code level data. Lawrence Berkeley National Lab, using more granular data, found that 70%+ of California solar adopters were from the top 40% highest income households, and over 80% of solar adopters have incomes above their local Area Median income.

programs: the NEM subsidy is significantly higher than and benefits a significantly smaller number of customers than the CARE program (Table 1).⁶

Table 1: PG&E, SCE, and SDG&E Comparison of Net Energy Metering (NEM) and California Alternative Rates for Energy (CARE) Programs		
	Net Energy Metering (NEM)	California Alternative Rates for Energy (CARE)
Total Subsidy (2020)	\$2.5 Billion	\$1.1 Billion
Total Benefiting Customers	930,000	2,700,000

Increasing the electricity bills of lower to moderate income customers to make solar a lucrative investment for higher income households is neither just, reasonable nor sustainable, particularly given the massive investments that must be made to realize long term GHG reduction goals, mitigate the risk of wildfires, modernize the grid and its resilience, reduce or eliminate dependence upon fossil fuels, ensure resource adequacy, among other goals, all while keeping rates affordable for customers. This overarching concern is the touchstone for and informs each of the Joint IOUs’ guiding principles. It too should provide the bedrock for the Commission’s development of the NEM successor tariff and all related schedules and issues. To that end, the NEM successor tariff should:

1. Provide Customer Choice Without Unjustly and Unreasonably Burdening Other

Customers: Californians should be free to generate or store their own clean power, but those choices should not increase the bills of customers who do not make, or have, that choice; many of whom are middle, or low-income, or live in disadvantaged communities.

⁶ For SDG&E, the California IOU with the highest penetration of NEM customers in the State, this differential is even greater. SDG&E’s annual NEM subsidy of \$514 million is already four times larger than the ratepayer cost to provide 30% electric bill discounts to its qualifying low-income customers through the CARE program.

2. **Maximize Environmental Benefits and Minimize Costs:** The Commission and the state should not ask or expect California’s electric utility customers to pay more for energy from rooftop solar if the same renewable energy and environmental benefits can be achieved at a lower cost. Many pressing and competing priorities are putting upward pressure on electric rates. Any incentive mandates imposed by regulators and policy makers to further the state’s greenhouse gas reduction and clean energy goals must aim to have the largest impact at least cost for all customers. The current NEM structure fails that test. The cost of solar systems has dropped 70% but the incentives paid to customers are tied to retail rates that continue to increase. In addition, rooftop solar is an inefficient and higher-cost approach to GHG reduction relative to utility-scale solar.⁷ Utility-scale solar provides greater GHG reduction benefits at a lower cost that are fairly absorbed by all bundled customers.
3. **Recognize that All Customers Should Equitably Contribute to Grid and Public Policy Programs Because Such Programs Benefit All Customers:** All customers rely upon and need a dependable and resilient grid. Thus, all customers -- those with solar systems and those without — should contribute equitably to the grid’s maintenance. It is counter-productive and unfair that the current NEM structure expects customers who are not financially privileged enough to take advantage of the NEM program to pay more of the costs to maintain the grid and to fund mandated public purpose programs, such as energy-efficiency and low-income assistance.
4. **Maximize Grid and System Benefits for All Customers with Paired Storage:** It is not reasonable to ask customers to subsidize with their rates any activity that produces minimal-to-no grid and system benefits, as is the case with stand-alone rooftop solar systems. To the extent the successor tariff provides subsidies, those should be limited to solar systems paired with energy storage which can provide greater value to the grid.

⁷ Analysis in California’s recent Integrated Resource Planning (IRP) process indicated that distributed solar is significantly more expensive than other renewable resources and can significantly increase utility system costs even before considering any subsidies shifted to non-adopting customers.

5. **Provide a Reasonable Return on Investments:** Eligible customer generators should receive a *reasonable* return on their investments, meaning that their bill savings eventually cover the cost of the investment over the life of the eligible renewable generating system. Those savings should be incrementally larger if the system includes paired storage, which provides system benefits. That sliding scale of benefits should be based upon the degree of benefits that the paired system provides to all customers.

B. The CPUC Should Include in Scope and Adopt the Ratepayer Impact Measurement (RIM) Test to Judge Compliance with AB 327

The OIR’s stated AB 327 statutory objectives are to ensure that customer-sited renewable generation grows in a sustainable manner, the new tariff “is based on the costs and benefits of the renewable electrical generation facility;” and “that the total benefits of the standard contract or tariff to all customers and the electrical system are approximately equal to the total costs.”⁸ The prior NEM successor proceeding deferred analysis of these AB 327 requirements to a later date when it could assess the effect of Time of Use (TOU) rates and the grid benefits, if any, of NEM systems.⁹ For this new NEM successor proceeding, the Joint IOUs submit the Commission should adopt, along with the guiding principles discussed above, the Ratepayer Impact Measurement test (RIM) as the appropriate tool to measure the costs and benefits of NEM tariffs from the perspective of all customers and the grid.

As defined in the Standard Practice Manual,¹⁰ the RIM test is designed to capture the impact on rates for *all* customers (not just nonparticipants): “The [RIM] test measures what happens to customer bills or rates due to changes in utility revenues and operating costs ...”¹¹ Further, the benefits of the RIM are a measure of the impact on the utility grid: “The benefits

⁸ OIR, at p. 4 (*citing* Pub. Util. Code §§ 2827.1(b)(1), (3), (4).)

⁹ D.16-01-044, pp. 54-61.

¹⁰ Standard Practice Manual, p. 13, available at:

[https://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Energy - Electricity and Natural Gas/CPUC STANDARD PRACTICE MANUAL.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Energy_-_Electricity_and_Natural_Gas/CPUC_STANDARD_PRACTICE_MANUAL.pdf)

¹¹ SPM, at p. 13.

calculated in the RIM test are the savings from avoided supply costs. These avoided costs include the reduction in transmission, distribution, generation, and capacity costs for periods when load has been reduced and the increase in revenues for any periods in which load has been increased.”¹² Finally, the RIM test is also the best method to capture the cost shift from participants to nonparticipants, which is a critical measure of the equity of a compliant NEM successor tariff. The Joint IOUs respectfully request that the Commission adopt the RIM test to satisfy its AB 327 mandate in this proceeding.

C. The Scope of the Proceeding Should Explicitly Include the Legacy Treatment of Customers Served on All Versions of the NEM Tariff

The OIR omits reference to legacy treatment, if any, for the new successor tariff, or the previously adopted legacy treatment for NEM 1.0 and NEM 2.0 – which are enormous contributors to the cost shift to nonparticipating customers. As previously mentioned, the massive subsidy paid by non-participating customers is currently \$2.5 billion annually and is projected to grow as electricity rates increase to \$4.4 billion per year by 2030.¹³ 60% of the cost shift -- lower income and middle income customers absorbing costs for more affluent customers -- is the result of legacy treatment for NEM 1.0 and NEM 2.0 customers who may have already recouped their investments. The Joint IOUs submit that legacy treatment for NEM 1.0, NEM 2.0, and new successor tariff customers must be included in scope. The Joint IOUs assume that the Commission’s reference to the scope including “any and all information necessary for: (1) development of a successor to the existing NEM 2.0 tariffs pursuant to the requirements of AB 327, and (2) issues related to existing NEM tariffs, including but not limited to questions about or modifications to specific provisions of the NEM tariffs”¹⁴ encompasses legacy treatment for all versions of the NEM tariffs but requests that the Commission make that fact explicit. The

¹² SPM, at p. 13 (emphasis added).

¹³ Statewide cost shift estimate is as of June 30, 2020 and is based on rates effective at that time. Avoided costs from 2020 ACC model were used in the cost shift estimate.

¹⁴ OIR at p. 6.

Commission has the authority to include legacy treatment in scope and take this urgent and necessary action. AB 327 directs the Commission to “consider a reasonable expected payback period based on the year the customer initially took service under the tariff” in setting a NEM 1.0 transition period.

D. The Joint IOUs Support Coordinating with Other Proceedings

The Joint IOUs wholeheartedly agree that the Commission should coordinate this Rulemaking with the proceedings it identifies,¹⁵ as well as others. Looking at the Commission’s and state’s environmental and energy policy objectives with a holistic view and engaging in cross-cutting coordination across numerous proceedings is critical to realizing the NEM reform demanded by AB 327. More specifically, the restrictions under AB 327/Section 2827.1 that limit the successor tariff to one that (1) allows customer-sited renewable generation to grow in a sustainable manner, (2) ensures the successor tariff “is based on the costs and benefits of the renewable electric generation facility”, and (3) ensures “that the total benefits of the [successor tariff] to all customers and the electrical system are approximately equal to the total costs.”¹⁶

As noted above, coordination is also crucial because the NEM subsidy must be understood in the context of other critical state and Commission objectives, including, but not limited to: the massive investments needed to achieve true GHG reduction; less reliance on fossil fuels; modernization of the grid to ensure its resilience; mitigation of the risk of wildfires and other climate change induced tragedies that can befall our customers and the electric system; and consistency in providing reliable service at just and reasonable rates. The \$2.5 billion to \$4.4 billion in NEM subsidies are a cost to non-participating customers that must be reduced to

¹⁵ OIR, at p. 1 (identifying R.19-09-009 on Microgrids and Resiliency, R.14-08-013 on Distribution Resources Planning, R.17-07-007 on Rule 21 and the interconnection of distributed generation resources, R.14-10-003 on Integrated Distributed Energy Resources (IDER), R.19-11-009 on Resource Adequacy and R.14-07-002 on the development of a successor tariff to the original NEM tariff.)

¹⁶ Cal. Pub. Util. Code § 2827.1(b)(3)-(4).

relieve the burden on customers particularly given the current status of the California economy due to the Covid-19 pandemic, and are far better spent elsewhere regardless.

The Joint IOUs recommend that the Commission coordinate with the proceedings cited in the OIR but also clarify that those proceedings represent a non-exhaustive list of the matters with which the Commission will coordinate as the scope of existing proceedings may expand and new proceedings that address overlapping issues may begin.

E. The Commission Should Address Modifications to Related NEM Tariff Schedules and Consumer Protection in Subsequent Phases of the Proceeding

The Joint IOUs submit that the Commission cannot efficiently resolve within the proposed schedule all the issues raised by the main successor tariff, the related NEM schedules including the impacts of proposed reforms on virtual and aggregated tariffs, as well as consumer protection that may arise over time and throughout the pendency of this proceeding on the ambitious schedule it currently proposes and which the IOUs contend is not ambitious enough with respect to creating a new main successor tariff and related issues.

It is imperative to immediately contain the growing inequity of the status quo. The Joint IOUs therefore recommend isolating the development of the new main successor tariff and related issues to the first phase of the proceeding. Related matters include the date certain upon which NEM 2.0 will close to new customers. Without an *imminent* date certain upon which the current NEM 2.0 schedule will close, a gold rush will predictably ensue, as was the case during the NEM 2.0 and TOU OIR proceedings.¹⁷ The Joint IOUs propose that the Commission end enrollment on NEM 2.0 as quickly as possible, but preferably in all events before, January 1, 2021. Customers with an interconnection agreement after this date would be temporarily served on NEM 2.0 until the utilities implement the new approved successor tariff or three years from

¹⁷ See, e.g., D.14-03-041, at pp. 12, 25 (discussing the concern in implementing new customer enrollments to the successor (now current) NEM tariff that the transition would encourage a “gold rush,” in which significant numbers of customers install systems just before the new tariff comes into effect, in order to take advantage of the transition period.)

Permission to Operate (PTO), whichever comes later. While the Joint IOUs appreciate that this will create some uncertainty for the solar industry in the brief interim period, that uncertainty must be balanced against the inequities the NEM program imposes on nonparticipating customers, particularly when certainty is never guaranteed when it comes to rates, which are always subject change.

In addition, the OIR does not clearly include in scope NEM-related consumer protection matters that will certainly evolve and continue to arise during the pendency of this proceeding. The Assigned Commissioner's Seventh Amended Scoping Memo and Ruling in the current NEM proceeding – R.14-07-002 – retains consumer protection issues, including the current citation program, related petition for modification, and new restitution fund matters and keeps the current proceeding open to resolve such matters until mid-2021. The Joint IOUs appreciate the Commission's desire to finalize consumer protection matters in the prior proceeding, but consumer protection issues are inextricably intertwined with successor tariff equity and design issues and will continue to be relevant and at issue throughout this proceeding. It therefore makes sense that they should also continue to be addressed in the instant proceeding. The Joint IOUs, however, do agree that as to stand-alone issues, as opposed to intertwined issues, they should be deferred to the later phases of the proceeding so that the Commission can conserve its resources and incisively resolve the deep inequities created by the current NEM tariff and develop a new main successor tariff.

F. The Commission Should Remove the RES-BCT and NEMFC Tariffs from the Scope of the Proceeding

RES-BCT and NEMFC are explicitly not NEM tariffs.¹⁸ It is therefore not proper to include within the scope of this proceeding. The Joint IOUs therefore respectfully request that the Commission omit reference to either tariff in its final Scoping Memo and Ruling.

III.

CATEGORIZATION AND HEARINGS

We agree with the ratesetting categorization. However, we do not agree that “the issues in this proceeding may be resolved through a combination of filed comments, workshops, and testimony, and that evidentiary hearings will not be necessary.”¹⁹ Given the breadth and depth of factual issues parties are likely to raise in this OIR, hearings are necessary and appropriate to test the evidence parties submit. To ensure there is a robust record upon which the Commission can justify its final decision on the successor tariff, legacy treatment, and all related tariff schedules and issues, the Joint IOUs respectfully request that the Commission allow for written testimony and hearings and modify the schedule to account for service of testimony, hearings, and post-hearing briefing.

IV.

SCHEDULE

The Joint IOUs appreciate the ambitious schedule the Commission proposes in the OIR. The Joint IOUs propose that the Commission conserve its resources and create conditions that will allow it to focus on and receive the most comprehensive and thoughtful contributions from

¹⁸ Neither RES-BCT nor NEMFC were established by the Legislature in PUC 2827, and thus are not affected by PUC 2827.1. RES-BCT is governed by PUC 2827 and 2830 and NEMFC is governed by 2827.10. Both tariffs credit exports to the grid at the generation component of the energy charge and always have. Despite NEMFC’s name, neither it nor RES-BCT are NEM tariffs. Both therefore are outside the scope of this proceeding.

¹⁹ OIR, at p. 9.

the parties by phasing the proceeding so that the end date for the current NEM 2.0 tariff and the development of the main successor tariff are the immediate focus of the proceeding, with related successor tariff schedules and consumer protection deferred to subsequent phases. Doing so may also allow the Commission, as proposed in the Joint IOU schedule below, to accelerate its already ambitious schedule so that Phase 1 is completed by August 2021. The Joint IOUs propose that the Commission issue another Scoping Memo and Ruling at the conclusion of Phase 1 to develop a schedule for subsequent phases. Joint IOUs recommend that parties be allowed to comment on the final version of the Lookback Study once is issued, and perhaps hold a workshop for this purpose. The Joint IOUs proposed schedule for Phase I is below.

Early Events Relating to Scope and Guiding Principles for All Aspects of the Successor Tariff and Legacy Treatment	Dates
OIR Issued	September 3, 2020
Opening Comments on OIR Due	October 5, 2020
Reply Comments on OIR Due	October 15, 2020
Opening Comments on Guiding Principles and an End Date for NEM 2.0	October 30, 2020
Prehearing Conference	November 2, 2020
Reply Comments on Guiding Principles and an End Date for NEM 2.0	November 6, 2020
Scoping Memo Ruling and Ruling on Guiding Principles	December 7, 2020

Phase 1 Events Relating Solely to the Main Successor Tariff	Dates
Party Proposals for Main Successor Tariff Elements with Supporting Written Testimony	January 22, 2021
Responses to Party Proposals for Main Successor Tariff Elements with Supporting Rebuttal Testimony	February 19, 2021
Hearings	March 15-26, 2021

Opening Briefs	April 30, 2021
Reply Briefs	May 28, 2021
Proposed Decision	June 28, 2021
Final Decision	August 2021

V.

CONCLUSION

The Joint IOUs respectfully request that the Commission (1) adopt the Joint IOUs Guiding Principles, RIM test, and other scoping recommendations for developing the successor tariff and its related tariff schedules, (2) phase the proceeding so that the main successor tariff and related issues are addressed immediately with other matters deferred to subsequent phases, (3) provide for written testimony and hearings in the schedule, and (4) adopt the Joint IOUs' proposed schedule for the proceeding.

Respectfully submitted on behalf of the Joint Utilities,

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