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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Application of Southern California Edison  
Company (U 338-E) to Establish Marginal Costs,  
Allocate Revenues, and Design Rates.

A.20-10-012  
(Filed October 23, 2020)

**MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) AND SETTLING  
PARTIES FOR ADOPTION OF RESIDENTIAL AND SMALL COMMERCIAL RATE DESIGN  
SETTLEMENT AGREEMENT**

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**MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) AND SETTLING  
PARTIES FOR ADOPTION OF RESIDENTIAL AND SMALL COMMERCIAL RATE DESIGN  
SETTLEMENT AGREEMENT**

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**I.**

**INTRODUCTION**

Pursuant to Rule 12.1 *et seq.* of the California Public Utilities Commission’s (Commission’s) Rules of Practice and Procedure, in Application (A.) 20-10-012, Application of Southern California Edison Company to Establish Marginal Costs, Allocate Revenues, and Design Rates, Southern California Edison Company (SCE), on behalf of itself and the other Settling Parties—the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN), the Solar Energy Industries Association (SEIA), the Center for Accessible Technology (CforAT), the Small Business Utility Advocates (SBUA), the Western Manufactured Housing Communities Association (WMA), and the California Farm Bureau Federation (CFBF) (collectively, “Settling Parties”)<sup>1</sup>—requests that the Commission adopt the “Residential and Small Commercial Rate Design Settlement Agreement” (Settlement Agreement), which is appended to this motion as Attachment A.

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<sup>1</sup> The Settling Parties to the Residential Settlement Agreement are: SCE, Cal Advocates, TURN, SEIA, CforAT, and WMA. The Settling Parties to the Small Commercial Settlement Agreement are: SCE, Cal Advocates, TURN, SBUA, and the CFBF.

The Settling Parties have executed a Settlement Agreement resolving all issues that have been raised with respect to residential and small commercial rate design in this proceeding, except for (1) Real Time Pricing rate design proposals raised by the Joint Advanced Rate Parties (JARP)<sup>2</sup> and SBUA, and (2) SEIA's proposal to increase the rate differentials for Schedules TOU-D-4-9PM and TOU-D-5-8PM.<sup>3</sup> Pursuant to the terms of the Settlement Agreement, and as soon as practicable following a Commission decision adopting the Settlement Agreement, but no earlier than June 1, 2022, SCE will adjust its rates for all of its residential and small commercial customers consistent with the terms of the Settlement Agreement.

Section II of this Motion provides the regulatory background about this proceeding and other related SCE rate design proceedings. Section III describes, in general, the positions advocated by the parties in this proceeding and the terms of the Settlement Agreement. Section IV demonstrates that the Settlement Agreement is reasonable in light of the whole record, consistent with law, and in the public interest. Section V discusses the procedural requests of the Settling Parties for disposing of this Motion and implementing revised rates.

## **II.**

### **BACKGROUND**

This proceeding was initiated by the filing of SCE's application on October 23, 2020, A.20-10-012, along with service of SCE's prepared direct testimony regarding marginal costs, revenue allocation and rate design. On December 22, 2020, SCE served supplemental testimony regarding certain revenue allocation proposals. On January 20, 2021, the Assigned Commissioner and Assigned Administrative Law Judge issued a Scoping Memo and Ruling following a December 16, 2020 prehearing conference. Cal Advocates served its direct testimony on June 24, 2021 and then served amended testimony on July 8, 2021 and August 11, 2021. On July 26, 2021, the following Settling Parties submitted prepared testimony regarding

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<sup>2</sup> The JARP are California Solar and Storage Association, Enel X North America, Inc., and Tesla, Inc.

<sup>3</sup> These excluded issues will be litigated and resolved by way of a final Commission decision.

residential and/or small commercial rate design: TURN, SEIA, CforAT, SBUA, and WMA.<sup>4</sup> Cal Advocates served supplemental testimony on revenue allocation on September 22, 2021.

The Settling Parties represent a broad spectrum of customer interests, as indicated in Section 1 of the Settlement Agreement. Each Settling Party represents customers or groups of customers who are directly affected by, and have an interest in, the resolution of the residential and/or small commercial rate design issues in this proceeding.

SCE provided notice to all parties of its intent to conduct a settlement conference related to all issues raised in the proceeding, and an initial settlement conference was held on August 12, 2021. Continuing discussions related to the potential settlement of issues in this proceeding occurred among the interested parties after the settlement conference.

### **III.**

#### **SUMMARY OF POSITIONS AND SETTLEMENT**

As noted, the Settlement Agreement resolves all issues related to residential and small commercial rate design issues in this proceeding, except for (1) Real Time Pricing rate design proposals raised by the JARP and SBUA, and (2) SEIA's proposal to increase the rate differentials for Schedules TOU-D-4-9PM and TOU-D-5-8PM.<sup>5</sup> The Settlement Agreement's primary provisions are summarized below and in the comparison exhibits to the Settlement Agreement (Appendices A and F), which provide a comparison of party positions related to residential and small commercial rate design issues, respectively, and explain the manner in which these issues have been resolved by the consolidated Settlement Agreement.<sup>6</sup>

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<sup>4</sup> CFBF did not serve testimony on small commercial rate design issues. However, CFBF actively participated in settlement discussions to ensure that their interests were protected with respect to issues pertaining to SCE's Small Business Threshold Study, which was attached as Appendix J to Exhibit SCE-04.

<sup>5</sup> These excluded issues will be litigated and resolved by way of a final Commission decision.

<sup>6</sup> Capitalized terms are defined in Paragraph 2 of the Settlement Agreement. The comparison exhibit also includes uncontested issues.

**A. Residential Rate Design**

The following details the Settling Parties' positions on the key issues resolved by this Settlement Agreement as well as the settlement that was reached with respect to each.<sup>7</sup>

First, SCE proposed to maintain the baseline usage allocation for Basic Service (as opposed to All-Electric) customers at the statutory maximum of 60 percent of average usage in each climate zone.<sup>8</sup> SCE also proposed to maintain the All-Electric baseline usage allocation, which is currently set at 60 percent for the summer and 70 percent for the winter.<sup>9</sup> SCE's proposals were not contested by any party and were supported by Cal Advocates.<sup>10</sup> The Settlement Agreement adopts SCE's baseline allocation proposals.

Second, SCE proposed to remove the eligibility restrictions and related attestation requirements for Schedule TOU-D-PRIME.<sup>11</sup> These restrictions limit participation on the rate to residential customers with specific clean energy technologies. SCE reasoned that residential customers who manage electricity bills by employing new technologies that allow shifting or shedding of load should have the same access to rate options that encourage this behavior as do non-residential customers.<sup>12</sup> SEIA supported this proposal, reasoning that the eligibility restrictions "arbitrarily limit this important electrification rate just to customers who install certain [distributed energy resources] technologies."<sup>13</sup> Cal Advocates and TURN opposed this proposal, however. Cal Advocates reasoned that removing the eligibility restrictions would

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<sup>7</sup> See comparison exhibit for a comprehensive list of parties' positions relating to residential rate design.

<sup>8</sup> See Exh. SCE-04, p. 36. See also Public Utilities Code Section 739(a)(1), which states, in relevant part, "'Baseline quantity' means a quantity of electricity or gas allocated by the commission for residential customers based on from 50 to 60 percent of average residential consumption of these commodities, except that, for residential gas customers and for all-electric residential customers, the baseline quantity shall be established at from 60 to 70 percent of average residential consumption during the winter heating season."

<sup>9</sup> Exh. SCE-04, p. 36.

<sup>10</sup> See Exh. PAO-07, Cal Advocates Prepared Testimony on Residential Rate Design, p. 7-1.

<sup>11</sup> Exh. SCE-04, pp. 37-38.

<sup>12</sup> Small business (TOU-GS-1) customers can currently elect to enroll in Option D or E rate with no eligibility restrictions.

<sup>13</sup> SEIA Prepared Direct Testimony, p. 24.

“incentivize those who would see lower utility bills on TOU-D-PRIME than their otherwise applicable tariff to switch without necessarily investing in clean technologies, while potentially creating a large revenue shortfall.”<sup>14</sup> TURN concurred with Cal Advocates.<sup>15</sup> The Settling Parties agreed to maintain the eligibility restrictions and attestation requirements for new customers voluntarily taking service on TOU-D-PRIME. In addition, SCE agreed to continue tracking the revenue differential associated with TOU-D-PRIME compared to TOU-D-4-9PM. As set forth in more detail in the Settlement Agreement, should the annual revenue differential reach the agreed-upon threshold of the current differential<sup>16</sup> plus \$66 million, SCE will review the TOU-D-PRIME rate design and eligibility to consider if modifications of the rate are necessary in SCE’s 2025 General Rate Case (GRC) Phase 2 application, and initiate a meet and confer with the Residential Settling Parties to discuss potential modifications of this rate.

Third, SCE proposed a rider option under TOU-D-PRIME for separately metered residential electric vehicle (EV) loads.<sup>17</sup> Under this option, a monthly credit will be applied to the customer charge to make the separately metered TOU-D-PRIME customer charge consistent with the separately metered Schedule TOU-EV-1 monthly meter charge. The reduced customer charge is intended to recover the cost of the additional meter, while recognizing that the service point and other associated facility costs are recovered through the customer charge of the primary meter. This proposal was not contested by any party, and Cal Advocates supported the proposal because it “saves separately metered customers money on fuel costs when transitioning from a gasoline-powered vehicle, and the potential cost shifts would be insignificant due to the small population of separately metered EV customers[.]”<sup>18</sup> The Settlement Agreement adopts SCE’s proposal.

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<sup>14</sup> Exh. PAO-07, Cal Advocates Prepared Testimony on Residential Rate Design, p. 7-8.

<sup>15</sup> Exh. TURN-01, p. 45.

<sup>16</sup> SCE will provide a report of the then current differential within 30 days of implementation of a Decision approving this settlement.

<sup>17</sup> Exh. SCE-04, p. 37.

<sup>18</sup> Exh. PAO-07, Cal Advocates Prepared Testimony on Residential Rate Design, pp. 7-11 – 7-12.

Fourth, based on a study conducted pursuant to the Residential and Small Commercial Rate Design Settlement Agreement in SCE's 2018 GRC Phase 2 proceeding, SCE proposed an incremental baseline allowance for customers with electric heat pump water heater (HPWH) technology who take service on either TOU-D-4-9PM or TOU-D-5-8PM.<sup>19</sup> SCE's goal with this proposed allowance was to keep the customer's average rate approximately unchanged by the additional HPWH load in order to encourage the use of HPWHs as an energy-efficient, greenhouse gas-reduction technology. Cal Advocates was the only party to respond to this proposal in testimony. Cal Advocates recommended that the Commission reject SCE's proposal on the grounds that it would be unnecessary given the existence of other SCE rates, like TOU-D-PRIME, which encourage fuel switching and given the bill savings already inherent in the efficiency of HPWHs.<sup>20</sup> Cal Advocates further pointed out that "any analysis of the need for electric rate modifications to support fuel switching must consider overall energy costs (gas and electricity) rather than electricity costs alone."<sup>21</sup>

For purposes of settlement, the Settling Parties agreed that it would be appropriate to apply the anticipated incremental HPWH load allowance to the current baseline level. The Settling Parties further agreed that, to determine the anticipated incremental HPWH load for this analysis, it would be appropriate to account for a typical industry-prevalent unit with moderate-to-average efficiency and to calculate an appropriate incremental baseline allowance for each baseline zone by season.<sup>22</sup> Using this approach, which is covered in more detail in the Settlement Agreement, the Settling Parties agreed to provide customers receiving a basic baseline allowance with an incremental allowance of 1.9 kilowatt-hours (kWh) per day in the Summer and 2.6 kWh per day in the Winter, and customers receiving an All-Electric baseline

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<sup>19</sup> Exh. SCE-04, pp. 38-46.

<sup>20</sup> Exh. PAO-07, Cal Advocates Prepared Testimony on Residential Rate Design, p. 7-15.

<sup>21</sup> Exh. PAO-07, Cal Advocates Prepared Testimony on Residential Rate Design, p. 7-16.

<sup>22</sup> Hourly HPWH load was obtained from the 2021 Database for Energy Efficient Resources (DEER) developed by the CPUC. See [Home \(deeresources.com\)](http://deeresources.com).



allowance with an incremental allowance of 1.9 kWh per day in the Summer and 3.0 kWh per day in the Winter.

In November 2021, the Commission issued Decision (D.) 21-11-002 in the Building Decarbonization Rulemaking, R.19-01-011 (the Decision). This Decision ordered SCE, along with the other large electric investor-owned utilities, to study net energy (electric and gas) bill impacts that result when a residential customer switches from a natural gas water heater to an electric HPWH and, if such a study shows a net increase in energy bills, to propose a rate adjustment in a new Rate Design Window application.<sup>23</sup> As discussed in more detail in Section IV.B. below, the Settling Parties considered the requirements in D.21-11-002 for HPWH rate adjustments and believe that the settled approach meets those requirements.

Fifth, Cal Advocates and CforAT proposed that SCE adopt a line-item discount structure for non-tiered TOU rates in order to provide customers who are eligible for the medical baseline discount an equivalent subsidy on the non-tiered TOU rates despite those rates not having a baseline credit structure.<sup>24</sup> Under the Settlement Agreement, SCE agrees to provide a line-item discount of 11% to eligible customers selecting residential non-tiered rate schedules, including customers enrolled in the Self Generation Incentive Program, in order to provide these customers with an equivalent benefit to the medical baseline subsidy on rates that do not have a baseline credit structure.<sup>25</sup> The discount of 11%, which was calculated by examining the total bills of customers receiving the medical baseline discount compared to those same bills without the discount, will be applied to currently available non-tiered rate options except for options that are

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<sup>23</sup> D.21-11-002, OP 4.

<sup>24</sup> Exh. PAO-07, Cal Advocates Prepared Testimony on Residential Rate Design, pp. 7-7 – 7-8; CforAT Opening Testimony, pp. 3-4.

<sup>25</sup> The discount will be applied on customer bills after accounting for applicable exemptions. Medical Baseline customers are exempted from paying the DWR Wildfire charge (previously DWR Bond charge).

closed to new customers, such as the legacy TOU-D-B Option.<sup>26</sup> It will also be made available in conjunction with any newly developed non-tiered rate options. Customers selecting to receive the medical discount on a non-tiered rate would also receive all non-financial benefits provided to Medical Baseline customers.

Sixth, SCE updated the submetering discounts for master-metered customers. Customers served on Schedule DMS-2 receive a discount for providing sub-metered service, which is comprised of a cost-of-service discount that is reduced by a diversity benefit adjustment (DBA) and a multi-family Basic Charge adjustment. In testimony, SCE proposed a total submetering discount of .185 ¢/day based on multi-family costs.<sup>27</sup> WMA and TURN were the only parties to serve testimony on this issue. WMA proposed a total submetering discount of .447¢/day based on single-family costs.<sup>28</sup> WMA also recommended that SCE include the impact of the current, lower High Usage Charge (HUC) approved in D.20-05-013 in the DBA component (and update the DBA should the HUC be eliminated).<sup>29</sup> TURN's testimony was limited to a recommendation that SCE include a DBA for Schedule DMS-3 (which does not currently have a DBA) in its next GRC.<sup>30</sup>

As set forth in more detail in the Settlement Agreement, the Settling Parties ultimately agreed to a cost-of-service discount of .3032 ¢/day and a total discount of .2112 ¢/day, which were based on single-family costs except that the costs of the Final Line Transformer (FLT) and Service Drop (SD) used were 67% of the full costs as determined by historical usage for the years 2018 through 2020. SCE also agreed to include the impact of the current, lower HUC in the DBA component and to update the DBA if the HUC is subsequently eliminated for SCE.

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<sup>26</sup> TOU-D-PRIME is currently the only available non-tiered rate option that will include the medical line-item discount upon implementation of the Residential Settlement Agreement. Should a new non-tiered rate option become available, this new medical line-item discount will apply to that new non-tiered rate option.

<sup>27</sup> Exh. SCE-04, p. 49, Table III-15.

<sup>28</sup> WMA Direct Testimony, p. 25.

<sup>29</sup> WMA Direct Testimony, p. 23.

<sup>30</sup> Exh. TURN-01, p. 45.

Finally, SCE agreed that, in its next GRC Phase 2 application, it would (1) include a proposal to calculate and collect a DBA from customers served on Schedule DMS-3 and (2) use single-family underground costs as the starting point for calculating the sub-metering discount in that proceeding.

Finally, SCE proposed to reduce the number of DMS rates by collapsing DMS-1 and DMS-3 into DMS-2.<sup>31</sup> TURN opposed this proposal on the grounds that SCE had not quantified any cost savings and that this consolidation would violate Public Utilities Code Section 739.5.<sup>32</sup> As part of the settlement, SCE agreed to withdraw this proposal.

**B. Small Commercial Rate Design**

The following details the Settling Parties' positions on the key issues resolved by this Settlement Agreement as well as the settlement that was reached with respect to each.<sup>33</sup>

Several issues related to small commercial rate design were uncontested, including SCE's proposal to continue offering the same options under Schedule TOU-GS-1, SCE's proposals to continue offering the same Wi-Fi, Standby, and GS-APS-E Schedules, and SCE's proposal to continue to provide eligible food banks with a 20 percent line-item discount. Similarly, SCE's proposal to close Schedule GS-1 after the replacement of the meters on Catalina Island with Edison SmartConnect (ESC) meters was uncontested.<sup>34</sup>

There were three main contested issues in this proceeding related to small commercial rate design. First, SCE proposed to establish a revised monthly customer charge of approximately \$19 on Schedule TOU-GS-1.<sup>35</sup> Both Cal Advocates and SBUA opposed this proposal. Cal Advocates recommended a reduced monthly charge of \$4.75 on Schedule TOU-GS-1 and the removal of the equal percent of marginal cost (EPMC) scalar from this customer

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<sup>31</sup> Exh. SCE-04, pp. 49-50.

<sup>32</sup> Exh. TURN-01, pp. 46-48.

<sup>33</sup> See comparison exhibit for a comprehensive list of parties' positions relating to small commercial rate design.

<sup>34</sup> See Exh. SCE-04, pp. 52-60.

<sup>35</sup> Exh. SCE-04, p. 53.

charge.<sup>36</sup> SBUA supported Cal Advocates' recommendation.<sup>37</sup> The Settlement Agreement adopts a customer charge that falls in-between these proposals. Under the Settlement Agreement, a customer charge of \$14.25 will apply to all options under TOU-GS-1 (except for the energy storage TOU-GS-1-ES option) and will remain fixed during the attrition years.<sup>38</sup> For the energy storage TOU-GS-1-ES option, the customer charge will be set at \$31 during implementation and will be subsequently scaled in the attrition years using the System Average Percent Change (SAPC) scalar excluding wildfire-related cost.

Second, SCE proposed to maintain the current rate design for Schedule TOU-EV-7 and to revise the energy charges to reflect updated marginal costs and revenue allocation.<sup>39</sup> SBUA proposed a rider discount for TOU-EV-7 given that small businesses in multi-tenant properties may not be able to install EV chargers without a separate meter.<sup>40</sup> The Settlement Agreement adopts a customer charge for Schedule TOU-EV-7 of \$7.33, which was derived using a 50/50 split of the RECC and NCO methodologies (with the EPMC scalar used only for the RECC portion) and with weighting to account for the migratory effect of TOU-EV-8 customers dropping down into the TOU-EV-7 class. The reduced customer charge is intended to recover the cost of the additional meter and associated ongoing customer service costs, while recognizing that for a portion of TOU-EV-7 customers, the service point and other associated facility costs are recovered through the customer charge of the primary (main site) infrastructure.

Third, in accordance with the settlement agreement adopted in SCE's 2018 GRC Phase 2 proceeding, SCE provided a study on whether to increase the monthly demand level which divides its small and medium General Service customers into the TOU-GS-1 and TOU-GS-2 rate

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<sup>36</sup> Exh. PAO-08, Cal Advocates Prepared Testimony on Small Commercial Rates, pp. 8-5 – 8-8.

<sup>37</sup> SBUA Direct Testimony, p. 40.

<sup>38</sup> This customer charge was derived using a 50/50 split of the Real Economic Carrying Charge (RECC) and New Customer Only (NCO) methodologies and with the EPMC scalar used only for the RECC portion. The revenue requirement used for the derivation of the EPMC scalar was set at June 2021 levels.

<sup>39</sup> Exh. SCE-04, p. 54.

<sup>40</sup> SBUA Direct Testimony, p. 56.

classes.<sup>41</sup> While SCE did not make any proposals in this proceeding based on this study, SCE included several recommendations submitted in a theoretical framework without consideration of potential implementation obstacles. SBUA reviewed SCE's study and concluded that it provided strong support for consolidating the TOU-GS-1 and TOU-GS-2 customer classes. On that basis, SBUA recommended that the Commission consolidate the TOU-GS-1 and TOU-GS-2 customer classes.<sup>42</sup> As part of the Settlement Agreement, SCE agreed to conduct another study, in collaboration with SBUA and other interested parties, to assess the feasibility and customer impacts of each of the following potential changes to the TOU-GS-1 classification:

- 1) Modify existing 20KW monthly maximum demand for TOU-GS-1 rate group;
- 2) Reclassify or consolidate the TOU-GS-1/TOU-GS-2 rate groups into a single rate group; and
- 3) Migrate existing lighting load on the TOU-GS-1 rate to other applicable lighting rate schedules or a new lighting and common services rate schedule.

This study will result in a proposal targeted for a Rate Design Window Application in 2022. Depending on the results of the study, the proposal will recommend either keeping the existing TOU-GS-1 classification unchanged or instead implementing one or more of these changes.

#### IV.

#### **REQUEST FOR ADOPTION OF THE SETTLEMENT AGREEMENT**

The Settlement Agreement is submitted pursuant to Rule 12.1 *et seq.* of the Commission's Rules of Practice and Procedure. The Settlement Agreement is also consistent with Commission decisions on settlements, which express the strong public policy favoring the settlement of disputes if they are fair and reasonable in light of the whole record.<sup>43</sup> This policy supports many worthwhile goals, including reducing the expense of litigation, conserving scarce Commission resources, and allowing parties to reduce the risk that litigation will produce

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<sup>41</sup> Exh. SCE-04, Appendix J.

<sup>42</sup> SBUA Direct Testimony, pp. 48-49.

<sup>43</sup> See, e.g., D.88-12-083 (30 CPUC 2d 189, 221-223) and D.91-05-029 (40 CPUC 2d, 301, 326).

unacceptable results.<sup>44</sup> As long as a settlement taken as a whole is reasonable in light of the record, consistent with the law, and in the public interest, it should be adopted without change.

The Settlement Agreement complies with Commission guidelines and relevant precedent for settlements. The general criteria for Commission approval of settlements are stated in Rule 12.1(d) as follows:

The Commission will not approve stipulations or settlements, whether contested or uncontested, unless the stipulation or settlement is reasonable in light of the whole record, consistent with law, and in the public interest.<sup>45</sup>

The Settlement Agreement meets the criteria for a settlement pursuant to Rule 12.1(d), as discussed below.

**A. The Settlement Agreement is Reasonable In Light Of the Record**

The prepared testimony, the Settlement Agreement itself, and this motion contain the information necessary for the Commission to find the Settlement Agreement reasonable in light of the record. Prior to the settlement, the Settling Parties conducted extensive discovery and served testimony on the issues related to residential and small commercial rate design. In a separate motion, any Settling Parties who have not yet done so will move to have the Commission admit their prepared testimony and related exhibits into the Commission's record in this proceeding.

The Settlement Agreement represents a reasonable compromise of the Settling Parties' positions. The prepared testimony of the Settling Parties, together with this motion and the attached Settlement Agreement (which includes the comparison exhibits), contain sufficient information for the Commission to judge the reasonableness of the settlement. Without divulging the content of confidential settlement negotiations, concessions by Settling Parties on some issues were offset by concessions by other Settling Parties on other issues, as is the case with almost every settlement. The Settlement Agreement accordingly represents a series of

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<sup>44</sup> D.92-12-019, 46 CPUC 2d 538, 553.

<sup>45</sup> See also, *Re San Diego Gas & Electric Company*, (D.90-08-068), 37 CPUC 2d 360.

tradeoffs and must be viewed as a “package.” No single provision should be viewed in isolation, although every individual provision is reasonable, lawful, and in the public interest. In summary, the Settlement Agreement is a reasonable compromise of the Settling Parties’ respective positions, as summarized in Section III and discussed in the following sections.

**1. Residential Rate Design**

Certain residential rate design issues were uncontested via testimony. SCE’s proposals regarding the Basic and All-Electric baseline allowances were unopposed. Similarly, although SCE’s direct testimony was silent on the provision of a medical baseline equivalent line-item discount for eligible customers on non-tiered TOU rates, the proposals made by Cal Advocates and CforAT regarding this issue were informed by analysis conducted by SCE following a meet and confer.<sup>46</sup> The agreed-upon 11% discount is reasonable because it would provide a benefit for medical customers on non-tiered residential rates that approximates the benefit, on average, that current medical customers on tiered residential rates receive.

As for the contested issues, Section III shows that there were several rate design related proposals that were heavily negotiated by the Settling Parties. For example, the agreed-upon total submetering discount of .2112 ¢/day falls in-between the .185 ¢/day proposed in SCE’s testimony and the .447¢/day proposed in WMA’s testimony and was calculated using a compromise between the calculation methodologies originally proposed.

There was also substantial give-and-take between the Settling Parties regarding several other proposals. For example, while the Settling Parties agreed to adopt SCE’s proposal to add a rider option under TOU-D-PRIME for separately metered residential EV loads, SCE’s proposal to remove the eligibility restrictions and related attestation requirements for this rate schedule was not adopted. Similarly, the Settling Parties compromised in setting a threshold for the TOU-D-PRIME revenue differential that, if reached, will trigger SCE to review the TOU-D-PRIME rate design and eligibility to consider if modifications of the rate are necessary in SCE’s

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<sup>46</sup> See Exh. PAO-07, Cal Advocates Prepared Testimony on Residential Rate Design, p. 7-7.

2025 GRC Phase 2 application, and to initiate a meet and confer with the Settling Parties to discuss potential modifications. These compromises with TOU-D-PRIME balanced the desire to continue providing benefits to those customers adopting electrification technologies that support climate change policies with the desire to retain appropriate measures to guard against unintended cost shifting consequences.

Finally, the agreed-to incremental baseline allowance for customers who have an electric HWPB is reasonable because it encourages the adoption and usage of electric HPWHs, which are an energy-efficient, greenhouse gas-reduction technology. As noted in D.21-11-002, the current design of SCE and the other investor-owned utilities' electric rates may discourage residential customers from switching from natural gas to electricity for water heating. The agreed-upon rate adjustment will reduce the potential financial disincentive for fuel switching by covering, for the average customer, the net energy bill increases that may result from switching from a natural gas water heater to an electric HPWH.

In sum, as a result of the compromises made and the balancing of interests, the Settlement Agreement reflects a reasonable resolution of the residential rate design issues covered therein in light of the record.

## **2. Small Commercial Rate Design**

The Settlement Agreement adopts several uncontested proposals relating to small commercial rate design, including SCE's proposal to continue offering the same options under Schedule TOU-GS-1 and SCE's proposal to close Schedule GS-1 after the replacement of the meters on Catalina Island with Edison SmartConnect (ESC) meters.

As for the contested proposals, the Settling Parties negotiated heavily over each. In several cases, such as the customer charges for TOU-GS-1 and TOU-EV-7, compromise was reached by using a hybrid approach that incorporated various Settling Parties' proposals and counter-proposals. As for SBUA's proposal to consolidate the GS-1 and GS-2 customer classes, the compromise position reached of SCE studying the feasibility and customer impacts of potential changes to the GS-1 classification and then presenting a formal proposal in a 2022



RDW is reasonable because it balances SCE's desire to understand the potential customer impacts and operational feasibility of making a change with SBUA's desire for the issue to be resolved without undue delay.

**B. The Settlement Agreement is Consistent with Law**

The Settling Parties believe that the terms of the Settlement Agreement comply with all applicable statutes and prior Commission decisions, and reasonable interpretations thereof. In agreeing to the terms of the Settlement Agreement, the Settling Parties have explicitly considered the relevant statutes and Commission decisions and believe that the Commission can approve the Settlement Agreement without violating applicable statutes or prior Commission decisions.

In particular, after agreeing to the terms of the Settlement Agreement relating to providing an incremental allowance for customers with HPWH technology who take service on either TOU-D-4-9PM or TOU-D-5-8PM, the Settling Parties explicitly considered the requirements in D.21-11-002 pertaining to rate adjustments for electric HPWHs to ensure the settled approach meets those requirements. Based on that consideration, the Settling Parties believe that the settled approach meets those requirements as set forth below.

- **D.21-11-002, Ordering Paragraph (OP) 4(a) and Appendix D, Section I.A.** During settlement negotiations, the Settling Parties examined how the findings in SCE's HPWH study would be affected by considering estimated gas bill savings in addition to the electric rate impact. SCE will update its existing HPWH study so that it reflects consideration of the total electric and gas bill impacts resulting from a residential customer switching from a natural gas water heater to an electric HPWH, and will submit that study to the Commission through a Tier 3 Advice Letter, consistent with OP 4 of D.21-11-002.
- **D.21-11-002, OP 4(b) and Appendix D, Section I.B.** The Settling Parties agree that the settlement reached for providing an incremental allowance for customers with HPWH technology complies with all of the requirements in Appendix D and obviates the need under OP 4(b) of D.21-11-002 for SCE to file a rate adjustment proposal in a new Rate Design Window Application.
- **D.21-11-002, Appendix D, Section I.C.1.** The Settling Parties agree that the settled-upon incremental allowance provides a rate adjustment sufficient to cover, for the average customer, the net energy bill increases as a result of switching from a typical natural gas water heater to a typical electric HPWH.

- **D.21-11-002, Appendix D, Section I.C.2.** The Settling Parties used the analysis from the 2021 Database for Energy Efficient Resources (DEER) developed by the Commission for purposes of determining the typical industry-prevalent gas and electric HPWHs to use for examining how the findings in SCE’s HPWH study would be affected by considering estimated gas bill savings and by accounting for typical industry-prevalent units with moderate efficiency.
- **D.21-11-002, Appendix D, Section I.C.3.** All customers who take service on either TOU-D-4-9PM or TOU-D-5-8PM and switch from a natural gas water heater to an electric HPWH are eligible under the Settlement Agreement to receive an incremental allowance, including customers already receiving the All-Electric baseline allowance.
- **D.21-11-002, Appendix D, Section I.C.4.** The settled-upon incremental allowance (a) reduces the cost barrier to customers shifting from natural gas water heaters to electric HPWHs by reducing the cost of incremental electricity usage; (b) encourages TOU by facilitating the adoption of Heat Pump technologies designed to be used during periods of the day when electricity prices are lowest; (c) can be easily understood by customers and mitigates against confusion by utilizing an existing rate element; and (d) takes into account anticipated savings due to the Settling Parties’ explicit consideration of the efficiency ratings of the most commonly purchased HPWH and estimated gas bill savings.
- **D.21-11-002, Appendix D, Section I.C.5.** Section 4.a.10.g of the Settlement Agreement provides that, for SCE’s next GRC Phase 2, SCE will evaluate whether the incremental HPWH allowance that is implemented was appropriate. This evaluation will include examining uptake and actual estimated changes in usage for participating customers. SCE will include the results of this evaluation in its testimony, as well as whether SCE recommends making any changes to the incremental HPWH allowance calculation, amount, mechanism, or implementation.
- **D.21-11-002, Appendix D, Section I.C.6.** Section 4.a.10.f of the Settlement Agreement provides that SCE will enhance its billing system to implement this incremental HPWH allowance, including by adding the necessary baseline calculations and creating a special identifier to enable customers to receive the allowance. The Settling Parties agree the implementation of the incremental HPWH allowance will occur on no earlier than October 1, 2022.
- **D.21-11-002, Appendix D, Section I.C.7.** The settled-upon incremental allowance satisfies the wide range of rate design principles. In D.21-11-002, the Commission lists the following rate design principles to serve as guidance in developing a HPWH rate proposal:
  1. Rates must be just, reasonable, and non-discriminatory.
  2. Rates should be based on marginal cost.
  3. Rates should be based on cost-causation principles.

4. Rates should encourage conservation and energy efficiency.
5. Rates should encourage reduction of both coincident and non- coincident peak demand.
6. Rates should be stable and understandable and provide customer choice.
7. Rates should generally avoid cross-subsidies, unless the cross-subsidies appropriately support explicit state policy goals.
8. Incentives should be explicit and transparent.
9. Rates should encourage economically efficient decision making.
10. Transitions to new rate structures should emphasize customer education and outreach that enhances customer understanding and acceptance of new rates and minimizes and appropriately considers the bill impacts associated with such transitions.

The settled-upon incremental allowance, and associated HPWH service option, which were designed on principles of cost causation with necessary exceptions to accommodate state policy priorities and affordability goals, directly satisfy eight of the ten (1, 4, 5, 6, 7, 8, 9, 10) rate design principles. Moreover, when the settled-upon incremental allowance is considered in conjunction with the underlying TOU rate, the remaining two (2 & 3) rate design principles are also satisfied.

First, the incremental allowance encourages energy efficiency and facilitates California's building decarbonization efforts by encouraging the use of efficient HPWHs. The settled-upon incremental baseline amount minimizes the impact to non-participants by providing the baseline credit to the portion of HPWH usage needed to maintain the average rate for a typical participant, thus encouraging HPWH adoption by mitigating incremental energy costs as a barrier to adoption. Baseline allowances are a familiar concept with customers, making the added feature easier for customers to understand and compare to the standard non-adjusted baseline allowance. In these ways, rate design principles 1, 6, 8, and 9 are all satisfied.

Second, customers who would like to choose highly efficient heat pump technology are currently eligible for the TOU-D-PRIME rate option. This incremental allowance will expand customer choice to the default TOU-D-4-9PM and TOU-D-5-8PM options. The TOU structure of these options maintains cost signals that encourage economically efficient consumption during low-cost periods but minimizes the barrier that rates may pose to adoption of HPWHs. The TOU structure also promotes the use of HPWHs as a form of energy storage to minimize coincident demands. Collectively, these attributes of the settled-upon incremental adjustment satisfy rate design principles 2, 3, 4, 5, and 7.

Finally, the incremental baseline allowance satisfies rate design principle 10 because it applies to current rate schedules which have been well marketed and utilizes a rate component that is already familiar to customers. Understandability is further addressed by offering a single incremental baseline allowance to all participants regardless of CEC building climate zone.

**C. The Settlement Agreement Is in the Public Interest**

This Settlement Agreement is “supported by parties that fairly represent the affected interests” at stake in this proceeding.<sup>47</sup> As the Commission has found, “[w]hile it is true that we employ a ‘heightened’ focus on the individual elements of a settlement when all interest groups are not accommodated, the focus itself is on whether the settling parties brought to the table representatives of all groups affected by the settlement. This is not necessarily the same as accommodating the litigation positions of all parties.”<sup>48</sup> In this instance, the Settling Parties represent the interests of residential and small commercial customers.

The Settlement Agreement is a reasonable compromise of the Settling Parties’ respective positions, as summarized in Sections III and IV.A. The Settlement Agreement is also in the public interest and in the interest of SCE’s customers. It fairly resolves issues and provides more certainty to customers regarding their present and future costs, which is in the public interest.

The Settlement Agreement, if adopted by the Commission, avoids the cost of further litigation, and frees up Commission resources for other proceedings. Given that the Commission’s workload is extensive, the impact on Commission resources is doubly important. The Settlement Agreement frees up the time and resources of other parties as well, so that they may focus on other proceedings and the other rate design portions of this proceeding. The prepared direct testimony contains sufficient information for the Commission to judge the reasonableness of the settlement and for it to discharge any future regulatory obligation with respect to this matter.

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<sup>47</sup> See D.07-11-018, *Order Denying Rehearing of Decision 07-03-044*.

<sup>48</sup> D.07-11-018 (citing *Re Southern California Edison Company, 1996*, 64 Cal.P.U.C.2d 241, 267).

V.

**CONCLUSION**

The Settling Parties seek approval of the terms of the Settlement Agreement so that SCE may implement rates as soon as practicable following the issuance of a final Commission decision approving the Settlement Agreement, but no earlier June 1, 2022.

WHEREFORE, the Settling Parties respectfully request that the Commission:

1. Approve the attached Settlement Agreement, without modification, as reasonable in light of the record, consistent with law, and in the public interest; and
2. Authorize SCE to implement changes in rates and tariffs in accordance with the terms of the Settlement Agreement.

Respectfully submitted,

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WILLIAM K. BRIGGS

/s/ William K. Briggs

By: William K. Briggs

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And on behalf of the Settling Parties.<sup>49</sup>

December 17, 2021

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<sup>49</sup> In accordance with Rule 1.8(d), each Settling Party has authorized SCE's counsel to sign and file this motion on its behalf.

**Attachment A**  
**Residential and Small Commercial Rate Design Settlement Agreement**

**EFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Application of Southern California Edison  
Company (U338E) to Establish Marginal  
Costs, Allocate Revenues, and Design Rates.

Application 20-10-012

**RESIDENTIAL AND SMALL COMMERCIAL RATE DESIGN SETTLEMENT**  
**AGREEMENT**

Dated: **December 17, 2021**

**RESIDENTIAL AND SMALL COMMERCIAL RATE DESIGN SETTLEMENT  
AGREEMENT**

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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Application of Southern California Edison  
Company (U338E) to Establish Marginal  
Costs, Allocate Revenues, and Design Rates.

Application 20-10-012

**RESIDENTIAL AND SMALL COMMERCIAL RATE DESIGN  
SETTLEMENT AGREEMENT**

In accordance with Article 12 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), the undersigned Settling Parties in Application (A.) 20-10-012, Application of Southern California Edison Company to Establish Marginal Costs, Allocate Revenues, and Design Rates, enter into this Residential and Small Commercial Rate Design Settlement Agreement (Agreement or Settlement Agreement), with reference to the following:

**1. Parties**

The Parties to the Residential Settlement Agreement are Southern California Edison Company (SCE), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN), Solar Energy Industries Association (SEIA), Center for Accessible Technology (CforAT), and the Western Manufactured Housing Communities Association (WMA) (collectively, “Residential Settling Parties”). The Parties to the Small Commercial Settlement Agreement are SCE, Cal Advocates, TURN, Small Business Utility Advocates (SBUA), and California Farm Bureau Federation (CFBF) (collectively, “Small Commercial Settling Parties”).

- A. SCE is an investor-owned public utility and is subject to the jurisdiction of the CPUC with respect to providing electric service to its CPUC-jurisdictional retail customers.

- B. Cal Advocates represents the interests of public utility customers. Its goal is to obtain the lowest possible rate for service consistent with safe, reliable service, and the State's environmental goals. Pursuant to California Public Utilities Code Section 309.5(a), Cal Advocates is directed to primarily consider the interests of residential and small commercial customers in revenue allocation and rate design matters.
- C. TURN is an independent, non-profit consumer advocacy organization that represents the interests of residential and small commercial utility customers.
- D. SBUA represents the interests of small commercial customers of bundled electricity as defined in California Public Utilities Code Section 1802.
- E. SEIA is the national trade association of the United States solar industry. Through outreach and education, SEIA and its 1,000 member companies work to make solar energy a mainstream and significant energy source by expanding markets, removing market barriers, strengthening the industry, and educating the public on the benefits of solar energy.
- F. CforAT is the leading organization representing the interests of utility customers with disabilities and medical needs.
- G. CFBF is California's largest farm organization, working to protect family farms on behalf of its nearly 34,000 members statewide and as part of a nationwide network of more than 5.5 million members.
- H. WMA is a not-for-profit trade association that represents the owners of both submetered and directly-served manufactured housing communities in California.

## **2. Definitions**

When used in initial capitalization in this Settlement Agreement, whether in singular or plural, the following terms shall have the meanings set forth below or, if not set forth below, then as they are defined elsewhere in this Settlement Agreement:

- A. "Base Rate" means the rate option (*e.g.*, E) in a rate group (*e.g.*, TOU-GS-1) against which all other options within the rate group are designed to be revenue neutral.
- B. "Basic Charge" means the monthly customer charge applied to customers in the Domestic Rate Group.

- C. “CARE” means California Alternate Rates for Energy, which is a program that provides customers meeting a certain household income criteria a discount from SCE’s otherwise applicable residential rates.
- D. “Commission” or “CPUC” means the California Public Utilities Commission.
- E. “Customer Charge” means the fixed dollar-per-month charge applied to customers in the Small Commercial Rate Group that are designed to recover the fixed customer costs of connection to SCE’s system.
- F. “Demand Charges” mean those charges that are comprised of Facilities-Related Demand (FRD) Charges, which are based on the customer’s maximum kilowatt (kW) demand during a billing period, and Time-Related Demand (TRD) Charges, which are based on the customer’s maximum kW demand during specified TOU periods. Demand Charges recover a portion of SCE’s delivery and generation costs, where such charges apply to a specific rate schedule.
- G. “Energy Charges” mean the dollar-per-kilowatt-hour (kWh) charges that recover (1) the portion of SCE’s generation services revenues not recovered in TRD Charges; (2) the portion of SCE’s delivery services revenues not recovered via Customer or Demand Charges; and, (3) other delivery services revenues for public purpose programs (including Energy Efficiency and CARE), New System Generation Service (NSGS), Nuclear Decommissioning, CARE balancing account, Wildfire Fund Non-bypassable Charge, Fixed Recovery Charge, and CPUC reimbursement fees. Energy Charges are designed to provide a price signal consistent with marginal cost differentials in TOU energy rates, where TOU energy rates apply to a specific schedule.
- H. “Energy Rates” means the volumetric rates paid by residential customers who are served on SCE’s residential rate schedules.
- I. “EPMC” means equal percent of marginal cost. Because marginal cost revenues do not equal the utility’s revenue requirement, in general, the utility revenue requirement is allocated to different rate groups in proportion to each rate group’s percentage share of marginal cost revenue responsibility by function (*i.e.*, separately for generation costs, and for combined distribution and customer costs). The marginal cost revenues of all rate groups are scaled using the same EPMC multipliers – one

- multiplier for generation and one for distribution – so that total system generation and distribution revenues equal the Commission-approved revenue requirements.
- J. “Facilities-Related Demand Charges” or “FRD Charges” mean charges applied to customers’ monthly maximum demands, not differentiated by TOU or by season, that are designed to recover certain transmission and distribution costs.
  - K. “FERA” means the Family Electric Rate Assistance program, which provides customers meeting a certain household income and size criteria a discount from SCE’s otherwise applicable residential rates.
  - L. “FERC” means the Federal Energy Regulatory Commission.
  - M. “Functional SAPC Allocation” means allocation of SCE’s revenue requirement to each of SCE’s rate groups based on the system average percentage change (“SAPC”) for the particular function, *e.g.*, generation, or distribution and customer costs. In addition, this would include adjustments of FERC-jurisdictional transmission revenues as authorized by formula rates or otherwise.
  - N. “Solar Legacy Customer” means an eligible residential customer who meets one of the two following criteria: (1) completed an interconnection application for a NEM successor tariff (also referred to as NEM-ST or NEM 2.0) prior to the implementation of default TOU rates for residential customers pursuant to Decision (D.) 16-01-044; or (2) submitted an initial interconnection application for an on-site solar generating facility not served on a NEM-ST tariff on or before January 31, 2017 and who opted into a TOU rate as of July 31, 2017. The duration of the legacy period is five years from the customer’s permission to operate (PTO) date, except for NEM 2.0 customers who are eligible for legacy rates for five years from the date that they first took service on the TOU rate.
  - O. “RA Settlement Agreement” means the Revenue Allocation Settlement Agreement filed in this proceeding on December 13, 2021.
  - P. “NCO” means New Customer Only, and is a method use to derive marginal customer access costs, taking into account the capital cost of adding new customers only and other operations and maintenance (O&M) costs.
  - Q. “OAT” means “Otherwise Applicable Tariff.”



- R. “PLRF,” means “Peak Load Risk Factor,” and represents the methodology used to assess capacity constraints on the distribution system and to assign peak-capacity-related design demand marginal costs to TOU periods.
- S. “RECC,” or “Real Economic Carrying Charge,” means the percentage of a utility investment which corresponds to the first year of a stream of numbers where the net present value of revenue requirements of a utility investment is adjusted to rise at the rate of inflation over the life of the investment. It also represents the value of deferring a utility investment by a year.
- T. “Small Commercial Rate Group” means the TOU-GS-1 rate group, which is comprised of customers with demands up to 20 kW taking service on the various schedules listed in Paragraph 4.B.3.
- U. “Time-Related Demand Charges” or “TRD Charges” are either generation-related, marginal cost-based, capacity-related charges assigned to TOU periods based on loss-of-load probabilities, or distribution-related, marginal cost-based, peak-related charges assigned to TOU periods based on PLRFs.
- V. “TOU” means time-of-use. These are the time periods established for the provision of electric service in which Demand Charges and/or Energy Charges may vary across time periods in relation to the cost of service, as adopted in Decision (D.)18-07-006.<sup>1</sup>

### 3. **Recitals**

- A. In Phase 2 of SCE’s 2021 General Rate Case (GRC), the Commission allocates SCE’s authorized revenue requirement among rate groups and authorizes rate design changes for rate schedules in each group.
- B. On October 23, 2020, SCE filed its 2021 GRC Phase 2 application (A.20-10-012) and served its initial prepared testimony regarding marginal costs, revenue allocation and rate design.
- C. Protests and responses to SCE’s Application were filed on November 30, 2020. On residential and small commercial rate design issues, Cal Advocates’ protest identified one of the issues as “whether the Commission should adopt SCE’s proposals to

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<sup>1</sup> See SCE’s Rate Design Window Application 16-09-003 (2016 RDW).

update and modify its residential and non-residential rate designs.”<sup>2</sup> TURN’s protest indicated an intention to “investigate and potentially litigate” various substantive proposals presented by SCE, including SCE’s proposed changes to the master-meter submetering discount and basic charge and SCE’s proposal to remove eligibility restrictions for its TOU-D-PRIME rate.<sup>3</sup> SBUA’s protest indicated an intention to investigate the reasons for SCE’s proposal to increase customer charges and to review the findings of the Small Business Threshold Study conducted by SCE.<sup>4</sup> SEIA indicated in its protest that it intended to “participate in this proceeding in order to continue the progress made in SCE’s past GRCs to modify elements of rate design that may present barriers to the more widespread adoption of solar technologies and other types of distributed energy resources, including storage, by all of SCE’s rate classes.”<sup>5</sup>

- D. On January 20, 2021, the Assigned Commissioner and Assigned Administrative Law Judge issued a Scoping Memo and Ruling following a December 16, 2020 prehearing conference.
- E. Cal Advocates served its initial testimony on June 24, 2021 relating, among other matters, to SCE’s residential and small commercial rate design proposals.
- F. On July 26, 2021, TURN, SBUA, SEIA, WMA, and CforAT submitted prepared testimony regarding residential and/or small commercial rate design matters.<sup>6</sup>
- G. Cal Advocates served amended testimony on July 8, 2021, and on August 11, 2021.
- H. SCE provided notice to all parties of its intent to conduct a settlement conference related to all issues raised in the proceeding, and an initial settlement conference was held on August 12, 2021. Continuing settlement discussions occurred among the parties after that date.

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<sup>2</sup> Cal Advocates protest, p. 2.

<sup>3</sup> TURN protest, p. 3.

<sup>4</sup> SBUA protest, pp. 4-5.

<sup>5</sup> SEIA protest, p. 2.

<sup>6</sup> CFBF did not serve testimony on small commercial rate design issues. However, CFBF actively participated in settlement discussions to ensure that their interests were protected with respect to issues pertaining to SCE’s Small Business Threshold Study, which was attached as Appendix J to Exhibit SCE-04.

- I. Cal Advocates served supplemental testimony on revenue allocation, including rate collaring, on September 22, 2021.
- J. The Residential Settling Parties and Small Commercial Settling Parties have evaluated various residential and/or small commercial rate design proposals in this proceeding, desire to resolve all issues related to the design of those rates,<sup>7</sup> and have each reached agreement as indicated in Paragraph 4 of this Agreement.
- K. Appendix A to this Agreement provides a comparison of the Residential Settling Parties' positions related to residential rate design issues that have been resolved by this Agreement. Appendix F provides a comparison of the Small Commercial Settling Parties' positions related to the small commercial rate design issues that have been resolved by this Agreement. In the event of a conflict between the terms of this Agreement and Appendices A or F, the terms of this Agreement shall control.

#### **4. Agreement**

In consideration of the mutual obligations, covenants and conditions contained herein, both the Residential Settling Parties and Small Commercial Settling Parties agree to the respective terms of this Agreement related to the design of residential and small commercial rates. The Residential Settling Parties agree to the terms set forth in Paragraph 4.A, below, and Paragraphs 5-16. The Small Commercial Settling Parties agree to the terms set forth in Paragraph 4.B., below, and Paragraphs 5-16. Any reference to a "package deal" to the terms to which the Residential Settling Parties agreed to, is distinct from the terms the Small Commercial Settling Parties agreed to. Nothing in this Agreement shall be deemed to constitute an admission by any Settling Party that its position on any issue lacks merit or that its position has greater or lesser merit than the position taken by any other Settling Party to the applicable terms of the Agreement. This Agreement is subject to the express limitation on precedent described in Paragraph 11. Unless provided otherwise, such as in Paragraph 11, this Agreement and its terms

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<sup>7</sup> Except for (1) Real Time Pricing rate design proposals raised by the JARP and SBUA, and (2) SEIA's proposal to increase the rate differentials for Schedules TOU-D-4-9PM and TOU-D-5-8PM.

are intended to remain in effect from the date rate changes are implemented as a result of a CPUC decision in this proceeding until a decision is implemented in Phase 2 of SCE's 2025 GRC.

**A. Residential Rate Design**

**1) Illustrative Rates**

The Residential Settling Parties agree that the results of the rate design process illustrated by the rate schedules in Appendix B to this Agreement are reasonable. These rates are based on the residential class's share of SCE's consolidated 2021 revenue requirement of \$14,388 million described in more detail in Paragraph 4.B.1. of the RA Settlement Agreement. These illustrative rates shall be adjusted consistent with the terms of this Agreement and the CPUC's decision in this proceeding related to the RA Settlement Agreement to reflect SCE's actual total system revenue requirement when this Agreement is implemented.

**2) Baseline Regions**

SCE's Baseline Regions are closely aligned to the California Energy Commission (CEC) climate zones that were in place in 2009 and were approved in D.09-08-028. Technological improvements in geographic information system (GIS) mapping over the years can in some instances cause slight shifting of Baseline Region boundaries, however, SCE's Baseline Regions are fixed to the KMZ vectors that were in place in 2009.<sup>8</sup>

**3) Baseline Allowances**

Baseline allowances for each of SCE's baseline regions were calculated in the following way: the bill frequency methodology was used to determine the residential customer usage (both for basic and all-electric service) for calendar year 2010 through calendar year 2019. For all-electric customers, the baseline allocation will remain at the statutory maximum levels of 60 percent for the summer and 70 percent for the winter. For basic electric customers, the baseline allocation will remain at the statutory maximum levels of 60 percent for both the summer and winter. Present and proposed baseline allowances are listed in Appendix

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<sup>8</sup> KMZ (Keyhole Markup Language zipped) is a file that stores maps locations viewable in Google Earth

C.<sup>2</sup> SCE will work with the parties before the next General Rate Case Phase 2 to address any changes to the baseline allowance that may be necessary.

4) **Fixed Charges and Minimum Bills**

No changes will be made to SCE's existing residential fixed charges or minimum bills.

5) **TOU Default Rate**

SCE's TOU-D-4-9PM is the default rate for purposes of revenue allocation and rate design. SCE is continuing with the transition from tiered rates to default TOU rates between October 2020 and early 2022. With the switch to the default TOU rate, the effective CARE and FERA discounts will be calculated inclusive of all statutory and regulatory rate exclusions and will be presented as a single line-item discount on customer bills.

6) **Additional Non-TOU Rate Schedules Available to Residential Customers include<sup>10</sup>**

a) **Schedule D**

No structural or eligibility changes are made to Schedule D.

b) **Schedule D-SDP**

No structural or eligibility changes are made to Schedule D-SDP.

c) **Schedule D-CARE**

No structural or eligibility changes are made to Schedule D-CARE.

SCE will continue to offer the CARE discount in the form of a line-item credit approved by D.18-12-004.

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<sup>2</sup> The present and proposed baseline allowances listed in Appendix C for Zone 15 follow the method established for Zone 15 customers in prior Commission decisions, which shifts some of the annual baseline allowance for Zone 15 from the winter to the summer months.

<sup>10</sup> Metered multi-family non-TOU tiered rate schedules are addressed in the Master-Meter Adjustments section.

**d) Medical Baseline**

No structural changes are made to the existing medical baseline provisions currently in place, which are applicable to any tiered rate. A new medical line-item discount will be offered to eligible customers on applicable non-tiered rate options as described below.

**i. Medical Line-Item Discount Equivalence for Non-Tiered Residential Rates**

A line-item discount of 11% shall be offered to eligible customers, including customers enrolled in the Self Generation Incentive Program, selecting residential non-tiered rate schedules to provide these customers with the benefit of the existing Medical Baseline subsidy on rates that do not have a baseline credit structure.<sup>11</sup> The line-item discount will be applied to currently available non-tiered rate options except for options that are closed to new customers, such as the legacy TOU-D-B Option.<sup>12</sup> It will also be made available in conjunction with any newly developed non-tiered rate options. This amount was calculated by comparing the total bills of customers receiving the medical baseline benefit on tiered rates to those same bills without the discount. The requirement for an 11% discount for customers who are enrolled in Medical Baseline will also apply to any new non-tiered rate options that are created prior to when the next General Rate Case Phase 2 is resolved.

Customers selecting to receive the medical discount on a non-tiered rate would also receive all non-financial benefits provided to Medical Baseline customers, including enhanced notice in advance of a de-energization event.

Eligible medical baseline customers would have a choice of how to receive their benefits, either by: (a) remaining on a tiered rate and receiving the additional medical baseline allowance, along with the Wildfire Non-bypassable Fund exemption; or (b) moving to a non-tiered TOU rate and receiving the 11 percent line-item discount and the

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<sup>11</sup> The baseline credit is the \$ per kWh difference from tier 2 to tier 1 rates (\$/kWh). Therefore, rates that have a baseline credit are, by definition, tiered rates.

<sup>12</sup> TOU-D-PRIME is currently the only available non-tiered rate option that will include the medical line-item upon implementation of this Residential Settlement Agreement. Should a new non-tiered rate option become available, this new medical line-item discount will apply to that new non-tiered rate option.

Wildfire Non-bypassable Fund exemption. For eligible customers taking service from a Community Choice Aggregator, or other unbundled service, SCE will determine the amount of the discount based on total bundled charges. SCE commits to implementing the structural changes to its billing systems (and associated external systems) that may be necessary to implement this line-item discount as soon as practicable, and at the latest by the end of summer of 2022.

e) **Schedule D-FERA**

No structural or eligibility changes are made to Schedule D-FERA. The FERA discount for eligible household will continue to be set at 18 percent.

f) **Schedules DE**

No structural or eligibility changes are made to Schedule DE.

7) **TOU Rates**

In addition to the tiered rate schedules described above, SCE also offers various TOU rates for residential customers.

a) **Schedule TOU-D-4-9pm and TOU-D-5-8pm**

Schedule TOU-D will continue to offer two options, 4-9PM and 5-8PM, with 4-9PM being the TOU default rate as described in Paragraph 4.A.5 above. These rates include a five-hour weekday on-peak period from 4 p.m. to 9 p.m. and a three-hour on-peak period from 5 p.m. to 8 p.m., respectively. No structural changes are proposed to this rate.<sup>13</sup>

b) **TOU-D-PRIME**

Schedule TOU-D-PRIME is an optional TOU rate intended for higher usage customers, and customers who have load-modifying electric technologies, including those customers who have electric vehicles (EVs), behind-the-meter (BTM) energy storage systems and/or electric heat pump systems for water or space heating.

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<sup>13</sup> This Settlement Agreement does not address or resolve SEIA's proposal to increase the rate differentials for Schedules TOU-D-4-9PM and TOU-D-5-8PM. The Residential Settling Parties agree that this issue will be litigated and should be resolved by way of a final Commission decision in A.20-10-012.

TOU-D-PRIME includes the following key rate design features:

- A shifting of a portion (approximately 40 percent) of summer on-peak generation capacity costs to winter to reduce seasonal bill volatility; A reduction in off-peak rates, with revenues shifted to mid-peak periods;
- The use of common winter off-peak and SOP rate factors to essentially provide a single off-peak period, allowing SCE to more easily describe the rate to customers and allowing customers to “set-and-forget” load modifying technologies to provide durable load-shifting benefits;
- No baseline credit; and
- A \$14 Basic Charge that will be scaled by the appropriate Functional SAPC scalar in the attrition years.

i. **Customer Eligibility**

Customer participation will be subject to the following terms and conditions:

- All existing customers on legacy options TOU-D-A, TOU-D-B, and TOU-D-T are eligible for service on TOU-D-PRIME when their legacy periods end.
- All new customers who voluntarily take service on this rate must attest to having an eligible technology.

ii. **Rider Option for Customers Separately Metering Electric Vehicle Charging**

A rider option under TOU-D-PRIME will be offered to customers who have separately metering electric vehicle charging. This rate rider will provide a monthly credit to be applied to the customer charge to make the separately metered TOU-D-



PRIME customer charge consistent with the separately metered Schedule TOU-EV-1<sup>14</sup> monthly meter charge. The reduced customer charge is intended to recover the cost of the additional meter, while recognizing that the service point and other associated facility costs are recovered through the customer charge of the customer's primary meter.

**iii. Differential Trigger/Reporting:**

Within 30 days of implementation of the Settlement Agreement pursuant to Section 5 of this Agreement, SCE will perform a calculation of the then current revenue differential between TOU-D-PRIME and TOU-D-4-9PM. The current annual revenue differential is the difference between all TOU-D-PRIME customers' annual bills under the TOU-D-PRIME rate and their bills if they were to take service on TOU-D-4-9PM. If an annual revenue differential of that amount plus \$66 million is reached (comparing TOU-D-PRIME to TOU-D, Option 4-9 PM) using the approved methodology,<sup>15</sup> SCE must (1) review the TOU-D-PRIME rate design and eligibility to consider if modifications of the rate are necessary in SCE's 2025 GRC Phase 2 application, and (2) initiate a meet and confer with the Residential Settling Parties to discuss potential modifications of this rate. SCE will also report to the Residential Settling Parties when/if the annual revenue differential reaches the halfway point of the newly determined threshold (current plus \$66 million)<sup>16</sup> and will provide updates for every incremental \$10 million of annual revenue differential thereafter until \$66 million plus the then current level is reached.

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<sup>14</sup> Schedule TOU-EV-1 is a discontinued rate option for customers who have electric vehicle charging stations with a dedicated meter.

<sup>15</sup> In SCE's 2018 GRC Phase 2 Settlement Agreement adopted by D.18-11-027, Parties agreed to a calculation methodology described in Cal Advocates' (then known as the Office of Ratepayer Advocates) direct testimony in pp. 8-13 to 8-14. Cal Advocates proposed that "the Commission should require SCE to perform revenue shortfall analysis comparing participants' average monthly bills under [TOU-D-PRIME] over a full year to their bills under the tiered rates *and* the default TOU rates, and the Commission should place a cap on the revenue shortfall of *\$50 million annually compared to the default TOU rates* (once they are adopted)." The methodology used by Cal Advocates in its workpapers to calculate a potential revenue shortfall from both new and existing customers will be similarly used to comply with this revenue differential trigger and reporting provision, except that NEM customers who opt into or are directed to enroll in TOU-D-PRIME will be excluded from this calculation.

<sup>16</sup> The newly determined threshold equals the current annual revenue differential plus \$66 million. For example, if the total annual revenue differential within 30 days of implementation of the decision in this GRC Phase 2 is \$30 million, then the annual revenue differential threshold until the next GRC Phase 2 is  $\$30 + \$66 = \$96$  million annual differential.

c) **Legacy TOU Period Rate Schedules**

i. **Schedule TOU-D-T**

Schedule TOU-D-T, which currently provides seasonal and time differentiated tiered energy charges with an on-peak period from noon to 6 p.m. on weekdays, will remain closed to new customers upon implementation of the decision resolving this Settlement Agreement. Depending on their Permission to Operate (PTO) date or the date they took service on the rate, solar customers are eligible to remain on Schedule TOU-D-T until their legacy periods have ended. No structural changes are proposed to this rate.

ii. **Schedule TOU-D-A**

Schedule TOU-D-A, which currently includes a baseline credit and higher on-peak energy charges (compared to TOU-D-B) with a 2 p.m. to 8 p.m. on-peak period, will remain closed to new customers upon implementation of the decision resolving this Settlement Agreement. Depending on their Permission to Operate (PTO) date or the date they took service on the rate, solar customers are eligible to remain on Schedule TOU-D-A until their legacy periods have ended. No structural changes are proposed to this rate.

iii. **Schedule TOU-D-B**

Schedule TOU-D-B, which includes a higher basic charge (currently approximately \$20.75/month) and lower on-peak charges (compared to Schedule TOU-D-A) with a 2 p.m. to 8 p.m. on-peak period, will remain closed to new customers upon implementation of the decision resolving this Settlement Agreement. No structural changes are proposed to this rate. Depending on their Permission to Operate (PTO) date or the date they took service on the rate, solar customers are eligible to remain on Schedule TOU-D-B until their legacy periods have ended.

iv. **Schedule TOU-EV-1**

Schedule TOU-EV-1 is an optional TOU rate for residential customers with separately metered EV load that includes an on-peak period of noon to 9 p.m. No structural changes are proposed to this rate. Schedule TOU-EV-1 will remain closed to new

customers upon implementation of the decision resolving this Settlement Agreement.<sup>17</sup> Solar customers are eligible to remain on Schedule TOU-EV-1 until their legacy periods have ended. Parties agree that all other remaining eligible EV customers will be allowed to remain on the rate through October 1, 2022,<sup>18</sup> at which time the customer will be migrated to another applicable rate.

## **8) Master-Meter Rates**

### **a) Description of Master-Metered Schedules**

SCE currently offers four master-metered schedules that include the same set of charges as Schedule D. They are Schedules DM, DMS-1, DMS-2, and DMS-3. Under these Schedules, service is supplied by SCE to more than one residence through a master meter. If residences are sub-metered, tenants are required to be billed by the owner or property management for their usage under Schedule D, Schedule D-CARE, or Schedule D-FERA. The charges in the master-metered electric bill are adjusted to reflect the specific cost characteristics of master-metered accounts.

### **b) Schedules DM, DMS-1, DMS-2, DMS-3**

No structural or eligibility changes are made to Schedules DM, DMS-1, DMS-2, and DMS-3; however, Schedule DMS-1 and DMS-2 are updated to reflect the submetering discounts set forth below.

### **c) Sub-metering Discount**

Customers served on Schedule DMS-2 receive a discount for providing sub-metered service, which is comprised of a cost-of-service discount that is reduced by a diversity benefit adjustment (DBA) and a multi-family Basic Charge adjustment.

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<sup>17</sup> SCE filed AL-4345-E in November of 2020 to reopen Schedule TOU-EV-1 on a limited basis to 1) new customers with existing infrastructure and 2) new or existing installations for Multifamily Accommodations. AL-4345-E was subsequently approved on March 18, 2021 with an effective date of November 18, 2020.

<sup>18</sup> D.18-11-027 adopts the 2018 GRC Residential and Small Commercial Rate Design Settlement Agreement that allows existing TOU-EV-1 customers to remain on the rate until July 31, 2022. Parties agree in this Residential Settlement Agreement to extend the migration date to October 1, 2022 to allow for sufficient time to communicate and inform customers of the changes upon the issuance of a final decision.

The discount for customers who provide sub-metered electric service on Schedule DMS-2 shall be \$0.3032 per space per day.<sup>19</sup> The multi-family Basic Charge adjustment shall be \$0.024 per space per day.

Using the methodology described in Exhibit SCE-04, taking into account the current, lower High Usage Charge approved in D.20-05-013, and based upon the revenue requirement and the residential rate structures proposed in this Agreement, the estimated DBA is \$0.084 per space per day. If the High Usage Charge is subsequently eliminated for SCE pursuant to the process set forth in Ordering Paragraph 2 of D.21-03-003, SCE will update the DBA to reflect that elimination.

The Basic Charge adjustments and the DBAs for Schedules DM and DMS-1 shall be determined in the same manner as the Basic Charge and DBA are determined for Schedule DMS-2 when this Agreement is first implemented. In accordance with prior practice, the cost-of-service discount provided to customers served on Schedule DMS-1 shall be set at a level that maintains the 28.2 percent difference between the discounts for Schedules DMS-1 and DMS-2. Submetering discounts do not apply to Schedules DM and DMS-3.

**d) Inclusions for SCE's 2025 GRC Phase 2 Application**

For its 2025 GRC Phase 2 application, SCE agrees to the following:

- SCE will include a proposal to calculate and collect a DBA from customers served on Schedule DMS-3, from whom no such adjustment is currently collected.
- In calculating the sub-metering discount in that proceeding, SCE will use single-family underground costs as the starting point for the calculations.

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<sup>19</sup> This sub-metering discount is based on the single-family underground costs as determined by the current Typical Customer Study shown in the workpapers for Exhibit SCE-02, except that the costs of the Final Line Transformer (FLT) and Service Drop (SD) are 67% of the full costs as determined by historical usage for the years 2018 through 2020. For how this calculation works, please see Appendix D to this agreement.

e) **Further Agreement on Schedule DM, DMS-1, DMS-2 and DMS-3**

Other than as noted above, the Residential Settling Parties agree that this Residential Settlement Agreement resolves all issues relating to SCE's master meter rate schedules and tariff language.

9) **Conservation Incentive Adjustment (CIA)**

In accordance with the CIA adopted in D.09-08-028, SCE's residential rates shall continue to reflect the rate differentials between tiers in the delivery component of those Energy Rates and not in the generation component of the Energy Rates.

As stated in Paragraph 4.B.5 subpart b) of the RA Settlement Agreement, parties agree to modify Preliminary Statement, Part FF, PPPAM, to eliminate the imbalance entry that currently records the CIA revenue and recovers those revenues from the Residential class. Instead, SCE would recover the amount from all customers by recording any imbalance to the distribution sub-account of SCE's Base Revenue Requirement Balancing Account (BRRBA-D).

10) **Heat Pump Water Heater Incremental Baseline Allowance**

a) **Customer Eligibility**

To encourage adoption and usage of heat pump water heater (HPWH) technology, an incremental baseline allowance shall be offered to qualified customers on TOU-D-4-9PM and TOU-D-5-8PM, including those already receiving an all-electric allowance. The purpose of this allowance is to cover, for the average customer, the net energy bill increases as a result of switching from a typical natural gas water heater to a typical electric HPWH.

b) **Customer Verification**

In order to receive the HPWH incremental baseline allowance, customers must either attest to having HPWH technology, or SCE must have a record of the customer having a HPWH. Customer records and attestations will be tracked in SCE's billing system, and customers will begin to receive the additional baseline credit allowance on or after

October 2022. SCE shall track and report on the number of customers who attest to having HPWH or have a record and receiving the incremental baseline allowance. This information will be included in SCE's 2025 GRC Phase 2 Application.

**c) Determining Incremental Baseline Allowance Amount**

For purposes of determining an appropriate incremental baseline allowance amount, the Parties agree that it is appropriate to apply the anticipated incremental HPWH load allowance to the current baseline level. The Parties further agree that, to determine the anticipated incremental HPWH load for this analysis, it is appropriate to account for a typical industry-prevalent unit with moderate-to-average efficiency. As such, based on analysis from the 2021 Database for Energy Efficient Resources (DEER) developed by the CPUC, the Parties agree that the usage for a HPWH unit with 50 gallons of storage and an UEF<sup>20</sup> of 3.31 is suitable for this analysis because that is a common size unit and a moderate-to-average efficiency level.<sup>21</sup>

HPWH usage for Zone 6 (mild), Zone 9 (moderate), and Zone 10 (hot) was then used to calculate an appropriate incremental baseline allowance for each baseline zone by season.<sup>22</sup> Due to the small variance in usage between zones, and to ease operational implementation and marketing, the Parties agree that a single incremental baseline allowance is appropriate. This single allowance was determined by taking the maximum seasonal allowance across zones as shown in Appendix E. This was computed for Basic and All-electric separately as the statutory baseline levels differ for the two groups.

**d) Consideration of Requirements in D.21-11-002**

After determining an appropriate incremental baseline allowance amount in the manner described in the previous section, the parties explicitly considered the requirements in D.21-11-002 (issued in November 2021) for HPWH rate adjustments to ensure the settled approach meets the requirements. Among other things, the parties examined how the findings in SCE's HPWH study would be affected by considering estimated gas bill savings in addition to the electric rate impact and by accounting for a typical industry-prevalent unit with

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<sup>20</sup> Uniform energy factor (UEF) is a metric developed by the United States Department of Energy for rating the efficiency of hot water heaters. A higher UEF indicates a more energy efficient unit.

<sup>21</sup> TechID: Stor\_UEF-ElecHP-050gal-3.31UEF from version 4.2 of the water heater calculator.

<sup>22</sup> Hourly HPWH load was obtained from the 2021 Database for Energy Efficient Resources (DEER) developed by the CPUC. See [Home \(deeresources.com\)](https://deeresources.com).

moderate efficiency. Based on this examination, the Parties agree that the incremental baseline allowance amounts agreed-to in this Agreement meet the requirements in D.21-11-002 and are sufficient to cover, for the average customer, the net energy bill increases as a result of switching from a typical natural gas water heater to a typical electric HPWH.

Consistent with Ordering Paragraph 4(a) in D.21-11-002, SCE will update its existing HPWH study so that it reflects consideration of the total electric and gas bill impacts resulting from a residential customer switching from a natural gas water heater to an electric HPWH, and will submit that study to the Commission through a Tier 3 Advice Letter. The Settling Parties agree that the settlement reached herein for providing an incremental allowance for customers with HPWH technology complies with all the requirements in Appendix D of D.21-11-002 and obviates the need under OP 4(b) of D.21-11-002 for SCE to file a rate adjustment proposal in a new Rate Design Window Application.

**e) Incremental Baseline Allowance Amount**

Based on the analysis discussed in the prior section, the Parties agree that the following incremental baseline allowances shall be provided to eligible customers with HPWHs.

	<i>Summer kWh per Day</i>	<i>Winter kWh per Day</i>
<i>Basic</i>	<i>1.9</i>	<i>2.6</i>
<i>All Electric</i>	<i>1.9</i>	<i>3.0</i>

**f) Implementation and Administration**

SCE will enhance its billing system to implement this incremental HPWH allowance. This enhancement includes adding the necessary baseline tables and creating a special identifier to enable customers to receive the allowance. Parties agree the implementation of the incremental HPWH allowance will occur no earlier than October 1, 2022.

**g) Evaluation in SCE's Next GRC Phase 2**

In its next GRC Phase 2, SCE commits to evaluating whether the incremental HPWH allowance that is implemented was appropriate. This evaluation will include examining uptake and actual estimated changes in usage for participating customers. SCE will

include the results of this evaluation in its testimony, as well as whether SCE recommends making any changes to the incremental HPWH allowance calculation, amount, mechanism, or implementation.

**B. SMALL COMMERCIAL RATE GROUP RATE DESIGN**

**1) Illustrative Rates**

The Small Commercial Settling Parties agree that the results of the rate design process illustrated by the rate schedules in Appendix G to this Agreement are reasonable. These rates are based on the Small Commercial Class's share of SCE's October 1, 2021 consolidated revenue requirement of \$14,388 million described in more detail in Paragraph 4.B.1 of the RA Settlement Agreement. These illustrative rates shall be adjusted consistent with the terms of this Agreement and the CPUC's decision in this proceeding related to the RA Agreement to reflect SCE's actual total system revenue requirement when this Agreement is implemented.

**2) Common Rate Design Principles**

**a) Rate Structure Elements**

Consistent with SCE's Application, rate structures for the Small Commercial Rate Group will generally consist of Customer Charges, TOU Energy Charges, TRD Charges, and FRD Charges. Demand Response (*e.g.*, CPP, SDP) and the currently available real-time pricing (RTP) rate schedules will also be available.

**i. Customer Charges**

Upon initial implementation of this Agreement, the Customer Charges in the Small Commercial Rate Group (except for the Energy Storage TOU-GS-1-ES option), shall be set at \$14.25 per month, and collected on a cents-per-day basis. Thereafter, the Customer Charges shall remain fixed during the attrition years of the 2021 GRC.

**ii. Energy Charges**

Proposed Energy Charges based on the consolidated revenue requirement used in the RA Settlement Agreement are set forth in Appendix G of this



Agreement.<sup>23</sup> When this Agreement is first implemented, these estimated Energy Charges shall be adjusted, as necessary, consistent with the then-current revenues allocated to each rate group in accordance with the RA Settlement Agreement.<sup>24</sup> Thereafter, these estimated Energy Charges shall be adjusted consistent with Paragraph 4.B.7 of the RA Settlement Agreement when SCE's authorized revenues change.

**(a) Generation Revenues**

With the exception of the Option D and the legacy B rate structures, all generation energy and capacity revenues are recovered entirely via Energy Charges for the Small Commercial Rate Group. For Option D, all generation energy revenues and a portion of generation capacity revenues are recovered via Energy Charges. The balance of generation capacity revenues is recovered via Demand Charges.

**(b) Distribution Revenues**

With the exception of the Option D, LG,<sup>25</sup> legacy Option B, and legacy Option C rate structures, all distribution peak-capacity and grid-related costs are recovered entirely via Energy Charges, with the peak-capacity portion time-differentiated using a settled version of PLRFs. For Option D, TOU Energy Charges recover approximately 50 percent of the distribution peak capacity costs. The balance of peak-capacity costs and all grid-related costs are recovered via Demand Charges.

**(c) Other Revenues**

Energy Charges that are designed to recover revenues associated with transmission, public purpose programs, new system generation service, nuclear decommissioning, CARE balancing account, Wildfire Fund Non-bypassable Charge, Fixed Recovery Charge, and the CPUC reimbursement fee shall be established on the basis of the specified functional authorized revenue requirements and the terms specified in the RA Settlement Agreement.

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<sup>23</sup> The consolidated revenue requirement is \$14,388 million and is described in more detail in Paragraph 4.B.1. of the RA Settlement Agreement.

<sup>24</sup> See Paragraph 4.B.6 of the RA Settlement Agreement.

<sup>25</sup> Option LG stands for "local government" and is a rate option only available to RES-BCT generating accounts.

**iii. Demand Charges**

For the Small Commercial Rate Class, Options D, LG, and the legacy Options B and C contain Demand Charges. For Option D and legacy Option B, Demand charges consist of both TRD Charges and FRD Charges. TRD Charges are applied in the summer on-peak period and winter mid-peak periods for Option D and applied in the summer on-peak and mid-peak periods for legacy Option B. FRD Charges are not differentiated by season or TOU periods.

**(a) TRD Charges**

Option D shall have both a summer on-peak distribution and generation TRD Charge, and a winter mid-peak generation TRD Charge, as shown in Table 4-1 below.<sup>26</sup> The summer on-peak TRD Charge shall recover both generation capacity costs and a portion of distribution peak-capacity costs.<sup>27</sup> The winter mid-peak TRD Charge shall recover generation capacity costs only. Legacy B shall have both a summer on- and mid-peak TRD charge.

***Table 4-1  
Illustrative Time-Related Demand Charges***

		<b>OU-GS-1, Option D</b>
On-Peak (\$/kW)	Summer	15.90
Mid-Peak (\$/kW)	Winter	3.84

When this Agreement is first implemented, these illustrative TRD Charges shall be adjusted, as necessary, consistent with the then-current revenues allocated to each rate group in accordance with the RA Settlement Agreement.<sup>28</sup>

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<sup>26</sup> TRD Charges apply on non-holiday weekdays only, not on weekends or holidays.

<sup>27</sup> The Option D structure includes time-differentiated distribution rates that recover approximately half of the summer allocation of distribution peak capacity revenues, the remaining half is recovered via a TRD Charge. For all other TOU periods, half of the peak capacity allocation of distribution revenues is recovered via Energy Charges and the remaining half is recovered via the FRD Charge.

<sup>28</sup> See Paragraph 4.B.6 of the RA Settlement Agreement.

Thereafter, these illustrative TRD Charges shall be adjusted consistent with Paragraph 4.B.7 of the RA Settlement Agreement when SCE's authorized revenues change.

**(b) FRD Charges**

With the exception of Option LG and legacy Option C, an FRD Charge is established to recover 100 percent of the grid-related portion of distribution design demand marginal costs, the portion of peak-related distribution design demand marginal costs not recovered via Energy or TRD Charges and transmission revenues, as shown in Table 4-2 below.

***Table 4-2  
Illustrative FRD Charges***

	<b>OU-GS-1, Option D</b>
RD Charge (\$/kW)	15.24

When this Agreement is first implemented, the illustrative FRD Charges shall be adjusted, as necessary, consistent with SCE's then-current authorized revenues and the RA Settlement Agreement. The distribution component of the illustrative FRD Charge shall be adjusted, as necessary, by the appropriate Functional SAPC distribution scalar when SCE's authorized distribution revenues change. Similarly, the transmission component of the illustrative FRD Charge shall be adjusted, as necessary, when FERC-authorized transmission revenues change.

**iv. Voltage Discounts**

Customers served at higher voltage delivery levels than the design voltage level for their rate group will receive a voltage discount reflecting their lower cost of service. SCE will establish the discount levels based on the difference in marginal costs of service between the design, or predominant, voltage level for a given rate group and the higher voltage service options. Voltage discounts shall apply to rate schedules in the Small Commercial Rate Group as indicated in Appendix G, and will continue to be assessed as a separate and distinct rate from the Customer Charge.

v. **Service-Phase Surcharge**

SCE shall assess a surcharge based on phase of service. Service is provided as either single- or three-phase, and is differentiated on a cost basis by the distribution facilities required by the customer. The service-phase discounts and surcharges are based on customer cost differentials and the use of a 50/50 split of the RECC/NCO method for determining the associated marginal customer costs. Service-phase discounts shall apply to rate schedules in the Small Commercial Rate Group, as indicated in Appendix G.

vi. **Demand Response Credits (CPP, SDP)**

The level of credits that are provided for non-firm service, including price-based and reliability-based demand response programs, shall reflect the incentive budget at the current level as shown in Appendix G to this Agreement.

b) **TOU and Seasonal Periods**

There are no changes to the existing TOU and seasonal definitions.

3) **Schedules in the Small Commercial Rate Group**

Illustrative proposed rates for the Small Commercial Rate Group are listed in Appendix G of this Agreement.

a) **Closing of Schedule GS-1 (Flat Rate)**

The “flat” Schedule GS-1 remains open to a very small number of customers with demands of 20 kW and less, who lack interval meters, particularly those on Catalina Island. This rate schedule shall include a \$14.25 Customer Charge, and summer and winter Energy Charges that shall be set revenue-neutral, on a seasonal basis, to Option E of Schedule TOU-GS-1.

SCE plans to replace the meters on Catalina with Edison SmartConnect (ESC) meters in 2022 and migrate these customers to their applicable TOU-GS-1 rate schedule by 2024/2025. SCE shall close Schedule GS-1 upon completion of the transition

b) **Schedule TOU-GS-1, Option E (Base Rate)**

Schedule TOU-GS-1, Option E shall serve as the “base rate” for Schedule TOU-GS-1. As described above, Option E contains a Customer Charge and TOU

Energy Charges, but no Demand Charges. Key rate design features specific to this rate option include the following:

- Moderated seasonal differentials;
- Moderated TOU Energy Charge differentials in the summer and winter periods;
- \$14.25-per-month Customer Charge that will remain fixed during the attrition years; and
- \$0.043 per day three-phase charge.

c) **Schedule TOU-GS-1, Option ES (Optional Storage Rate)**

Schedule TOU-GS-1, Option ES is an optional rate available only to customers who install BTM storage. Participation on this rate will be capped at 15,000 customers. Participants will be required to have a minimum energy storage capacity equal to the greater of either 4.8 kWh or at least 0.05 percent of the customer's annual usage (in kWh) over the previous months.<sup>29</sup> Customers who take service on Option ES are exempt from Standby service until the implementation of SCE's next GRC Phase 2, at which time the Standby exemption may or may not continue to apply depending on the outcome of a decision in that subsequent proceeding.

Option ES utilizes the same rate design structure as Option E (*i.e.*, Customer Charge, TOU Energy Charges, no Demand Charges), but includes the following differences:

- TOU Energy Charges are not moderated compared to Option E and contain no "flattening"; and,
- Customer Charge shall be set at \$31/month during implementation and subsequently scaled in the attrition years using SAPC scalar excluding wildfire-related cost;

d) **Schedule TOU-GS-1, Option CPP (Default Rate)**

Consistent with D.18-07-006, Option CPP is the default rate option for eligible Small Commercial customers. The CPP event periods will coincide with the updated

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<sup>29</sup> For customers with less than 12 months of annual usage data, the energy storage system must have a minimum energy storage capacity of at least 4.8 kWh.

peak periods (*i.e.*, weekdays from 4-9 p.m.). CPP credits will be provided as a \$/kWh credit on Summer Season weekdays 4:00 p.m. – 9:00 p.m., when a CPP Event is not occurring. The CPP Event Charge shall be set at \$0.80/kWh. Bill protection will be offered to customers for up to one year, accrued monthly, and paid at the end of the bill protection period), meaning that a customer on Option CPP is billed an amount no greater than what the customer would have been billed under the customer's OAT. Customers are permitted to opt-out of participating on Option CPP.

e) **Schedule TOU-GS-1, Option D (Optional Rate)**

Schedule TOU-GS-1, Option D shall serve as optional rate for Small Commercial customers. As described above, Option D contains a Customer Charge, established at \$14.25/month that will be fixed during the attrition years, TOU Energy Charges, and Demand Charges, as reflected in Appendix G. There are no additional eligibility or participation limitations associated with this rate schedule.

f) **Schedule TOU-GS-1, Option LG (RES-BCT Generating Accounts Only)**

SCE shall offer Option LG exclusively for TOU-GS-1 customers taking service on Schedule RES-BCT (Generating Account only),<sup>30</sup> which shall include a Customer Charge, established at \$14.25/month that will remain fixed during the attrition years, and an FRD Charge. Customers taking service on Option LG are required to take service on Schedule S as a rider.<sup>31</sup>

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<sup>30</sup> Schedule RES-BCT is an optional rate for local governments and campuses who own and operate an Eligible Renewable Generating Facility, as defined in the tariff, with a total effective generation capacity of not more than 5 MW. Schedule RES-BCT allows Local Governments or Campuses to generate energy from an Eligible Renewable Generating Facility for its own use (Generating Account) and to export energy not consumed at the time of generation by the Generating Account to SCE's grid. All generation exported to SCE's grid is converted into dollar credits and applied to the Benefiting Accounts designated by the Local Government or Campus. Only the Generating Account is required to take Standby service; therefore, Option LG is only available to the Generating Account (not to benefitting accounts).

<sup>31</sup> Schedule S consists of a \$-per-kW capacity reservation charge, applied to a monthly standby demand. Back-up TRD Charges are not applicable.

**g) Legacy TOU Rate Schedules**

Schedules TOU-GS-1-A, TOU-GS-1-B, and TOU-GS-1-C will remain closed to new customers upon implementation of the decision resolving this Settlement Agreement. Eligible customers will remain on these rate options until their legacy periods have ended. No structural changes are proposed to these rates. The customer charge for these schedules shall be set at \$14.25/month and will remain fixed during the attrition years.

**h) RTP**

Small Commercial customers will remain eligible for the RTP rate option. No structural changes to the RTP program are proposed in this Agreement. Rates for TOU-GS-1-RTP will be established as reflected in Appendix G to this Agreement.

**i) GS-APS-E**

Schedule GS-APS-E is an interruptible “summer discount plan” for Small Commercial customers. No structural changes to GS-APS-E are proposed in this Agreement. Illustrative rates reflecting the incentive budget at the current levels are reflected in Appendix G to this Agreement.

**j) Schedule TOU-EV-7**

TOU-EV-7 is a separately metered rate applicable solely to the charging of EVs for customers with demands of 20 kW or less. With regard to distribution charges, SCE will keep in place a feature that limits distribution charges for eligible TOU-EV-7 customers.<sup>32</sup> Because the EV rates feature a combination of distribution energy and demand charges, the demand comparison calculation and any resulting distribution “credit” will apply to both energy and demand charges.

Separately, the customer charge for TOU-EV-7 shall be set at \$7.33. The reduced customer charge is intended to recover the cost of the additional meter and associated on-going customer service costs, while recognizing that for a portion of TOU-EV-7 customers, the service point and other associated facility costs are recovered through the customer charge of the primary (main site) infrastructure. The revenue deficiency generated by

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<sup>32</sup> TOU-EV-7 customers who are collocated on the same premises as the General Service account.

this customer charge benefit will be collected through flat energy charges in order to maintain a revenue neutral rate design.

To account for the migratory effects of TOU-EV-8 customers dropping down into the TOU-EV-7 class, SCE applied two weights to derive the TOU-EV-7 customer charge. First, Weight A accounts for the number of TOU-EV-7 customers that have consistently remained EV-7 by reviewing historical customer data through March 2020. Weight A was applied to the derived GS-1 customer charge without including component specific credits (reductions) for the Final Line Transformer (FLT) and the Service Drop (SD). Second, Weight B accounts for the number of EV-8 customers that have dropped down into the EV-7 rate schedule. Customers on EV-8 are typically served through a separate FLT and SD. Thus, while the majority of EV-7 customers have a single FLT/SD that provides service to both the primary meter and additional meter(s), the EV-8 customers who have dropped down to the EV-7 class have higher cost equipment than typical EV-7 customers. Weight B was applied to the derived GS-1 customer charge components to account for this cost differential in deriving the settled-on customer charge. The table below illustrates the calculation of the EV-7 customer charge.

Number of continual EV-7 Customers expressed as a percent of total EV-7 customers	109 / 154 = 71%	Weight A
Number of EV-8 drop downs into EV-7 Rate Schedule expressed as a percent of total EV-7 customers	45 / 154 = 29%	Weight B
GS-1 Customer Charge with component credits for the FLT and SD	\$4.47	(a)
GS-1 Customer Charge with no credits	\$14.25	(b)
EV-7 Customer Charge	\$7.33	(a) x Weight A + (b) x Weight B



**k) Standby Service for Customers in the Small Commercial Rate Group**

Customers who provide all or a portion of their energy needs from a non-NEM generator are required to take standby service. The Standby Capacity Reservation Charge (CRC)<sup>33</sup> shall be applied to the customer's standby demand level as specified in Schedule S Standby.<sup>34</sup>

**4) Implementing Future Revenue Changes in Rates**

As described in the RA Settlement Agreement, when SCE's authorized revenues change in the future, SCE will first adjust rate levels for the base rate schedule (without CPP), *i.e.*, Schedule TOU-GS-1-E, using a Functional SAPC adjustment, with the customer charge remaining fixed as described in Paragraph 4.B.2 above. SCE will then rebalance optional rate levels to ensure revenue neutrality between the base rate schedule and the optional rate schedules. For example, generation revenue changes resulting from SCE's Energy Resource Recovery Account (ERRA) proceedings shall be allocated on a Functional SAPC basis, *i.e.*, the revised SCE generation revenue requirement would be allocated by applying a generation-level SAPC scalar based on the difference between present rate revenues and proposed rate revenues for the default rate schedules. The optional rate schedules will then be adjusted to ensure revenue neutrality on a functional basis.

**5) Feasibility Study on Reclassification of GS-1 Customer Class**

In collaboration with SBUA and all interested parties, SCE shall conduct a study to assess the feasibility and customer impacts of each of the following potential changes to the GS-1 classification.

- 1) Modify existing 20KW monthly maximum demand for the TOU-GS-1 rate group;
- 2) Reclassify or consolidate the TOU-GS-1 and TOU-GS-2 rate groups into a single rate group; and

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<sup>33</sup> Standby Capacity Reservation Charge (CRC) is a monthly charge based on the established Standby demand value. This charge is calculated by multiplying the Standby demand value by the applicable CRC price. The CRC is billed every month regardless of the maximum demand registered on the meter.

<sup>34</sup> Customers on Option ES are exempt from Schedule S, Standby.

- 3) Migrate existing lighting load on the TOU-GS-1 rate to other applicable lighting rate schedules or a new lighting and common services rate schedule.

This study will result in a proposal targeted for a Rate Design Window Application in 2022. Depending on the results of the study, the proposal will recommend either keeping the existing GS-1 classification unchanged or instead implementing one or more of the potential changes listed above. Other potential changes may also be identified by the study.

The study may involve the following elements, and additional elements may be identified as the study progresses:

- More precise analysis of TOU-GS-1 and TOU-GS-2 customers' load behaviors. Evaluating potential similarities in load usage between TOU-GS-1 and TOU-GS-2 customers that may warrant rate consolidation;
- Research on existing lighting loads on GS-1 and the cost effectiveness of implementing a migration of this existing lighting load to other applicable lighting rate schedules (recognizing that these loads may not be 100% lighting);
- Exploration of rate design changes under various scenarios (e.g., change in monthly maximum demand threshold, rate impacts from consolidating the TOU-GS-1 and TOU-G2-2 rate groups, differentiation of monthly charges based on service level and transformer, assess the removal or the level of EPMC scalar from customer charge design, etc.);
- Evaluation of bill impacts of potential rate design changes by customer bins that reflect different usage sizes within each customer class;
- Identification of necessary tariff and Rule 1 changes such as definition of small business customers, programs eligibility, and terms applicable to SCE's level pay plan (LPP) as required in D.00-06-034;
- Collaboration with various organization units (Customer Service for affected customer classes, IT, Billing) to explore timeline and feasibility of potential changes; and
- Determination of a proposed timeline for implementation of potential changes.

The feasibility study will kick-off in the 2<sup>nd</sup> quarter of 2022, with quarterly meetings, or more frequently as needed, scheduled to engage with external stakeholders. Details and progress will be shared during those meetings with the objective of gathering input and feedback from all stakeholders. Upon completion of the study, a proposal will be filed by the end of 2022 in a Rate Design Window Application.

## **6) Food Bank Rate**

To comply with Assembly Bill 2218<sup>35</sup> and California Public Utilities Code Section 739.3, SCE will continue to provide eligible food banks, as defined in California Public Utilities Code Section 739.3(c)(1), a 20 percent discount on their OAT bill.

## **5. Implementation of Settlement Agreement**

It is the intent of the Residential and Small Commercial Settling Parties that SCE should be authorized to implement the rates resulting from this Settlement Agreement as soon as practicable following the issuance of a final Commission decision approving this Settlement Agreement, but no earlier than June 1 of 2022.

## **6. Incorporation of Complete Agreement**

The Residential Settling Parties intend the terms described at the outset of Paragraph 4.A. to be treated as a complete package and not as a collection of separate agreements on discrete issues. Similarly, the Small Commercial Settling Parties intend the terms described at the outset of Paragraph 4.B. to be treated as a complete package and not as a collection of separate agreements on discrete issues. To accommodate the interests related to diverse issues, both the Residential and the Small Commercial Settling Parties acknowledge that changes, concessions, or compromises by any Settling Party or Settling Parties in one section of the applicable terms of this Agreement resulted in changes, concessions, or compromises by the Settling Parties in other sections. Consequently, the Residential and the Small Commercial Settling Parties agree to oppose any modification in each of the applicable terms of this Agreement not agreed to by all Settling Parties who agreed on those terms. If the Commission does not approve this Agreement

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<sup>35</sup> Assembly Bill (AB) 2218, Bradford (2014), codified in the Public Utilities Code Section 739.3.

without modification, the Settling Parties to whom that change is relevant in the Agreement shall promptly discuss the proposed modification and negotiate in good faith to achieve a resolution acceptable to the Settling Parties as set forth in Section 9 below, and shall promptly seek Commission approval of the resolution so achieved.

**7. Record Evidence**

The Residential and Small Commercial Settling Parties request that all of their related prepared testimony be admitted as part of the evidentiary record for this proceeding.

**8. Signature Date**

This Settlement Agreement shall become binding as of the last signature date of the Settling Parties.

**9. Regulatory Approval**

The Residential and Small Commercial Settling Parties, by signing this Agreement, acknowledge that they support Commission approval of this Agreement and subsequent implementation of all the provisions of the Agreement for the duration of rates implemented pursuant to a Commission order adopting this Agreement in this proceeding, *i.e.*, Phase 2 of SCE's 2021 GRC. The Residential and Small Commercial Settling Parties shall use their best efforts to obtain Commission approval of the Agreement. The Residential and Small Commercial Settling Parties shall jointly request that the Commission approve the Agreement without change, and find the Agreement to be reasonable, consistent with law and in the public interest. Should any Proposed Decision or Alternate Proposed Decision seek a modification to this Settlement Agreement, and should any Residential or Small Commercial Settling Party be unwilling to accept such modification, that Settling Party shall so notify the other Settling Parties for the respective settlement within five business days of issuance of such Proposed Decision or Alternate Proposed Decision. The Residential and Small Commercial Settling Parties shall thereafter promptly discuss the proposed modification and negotiate in good faith to achieve a resolution acceptable to the Settling Parties, and shall promptly seek Commission approval of the resolution so achieved. Failure to resolve such proposed modification to the satisfaction of the

Settling Parties, or to obtain Commission approval of such resolution promptly thereafter, shall entitle any Settling Party to terminate its participation from this Agreement through prompt notice to the other Settling Parties.

**10. Compromise of Disputed Claims**

This Settlement Agreement represents a compromise of disputed claims between the Residential and Small Commercial Settling Parties for each of the terms to which they have agreed. The Residential and Small Commercial Settling Parties have each independently reached an agreement on the issues related to the design of those rates after taking into account the possibility that each Party may or may not prevail on any given issue. The Residential and Small Commercial Settling Parties assert that this Settlement Agreement is reasonable, consistent with law and in the public interest.

**11. Non-Precedential**

Consistent with Rule 12.5 of the Commission's Rules of Practice and Procedure, this Agreement is not precedential in any other proceeding before this Commission, unless the Commission expressly provides otherwise.

The Residential and Small Commercial Settling Parties expressly recognize that each Party may advocate a position that is inconsistent with this Agreement in Phase 2 of SCE's 2021 General Rate Case or in another proceeding if invited by the Commission. Barring Commission-ordered modifications to this Settlement Agreement, the Settling Parties will support the continued applicability of Section 4 until the date on which SCE's tariffs implementing its 2021 GRC Phase 2 becomes effective.

**12. Previous Communications**

The Settlement Agreement contains the entire agreement and understanding between the Settling Parties as to residential and small commercial rate design issues. In the event there is any conflict between the terms and scope of this Settlement Agreement and the terms and scope of the accompanying joint motion in support of the Settlement Agreement, the Settlement Agreement shall govern.

**13. Non-Waiver**

None of the provisions of this Settlement Agreement shall be considered waived by any Party unless such waiver is given in writing. The failure of a Party to insist in any one or more instances upon strict performance of any of the provisions of this Settlement Agreement or take advantage of any of their rights hereunder shall not be construed as a waiver of any such provisions or the relinquishment of any such rights for the future, but the same shall continue and remain in full force and effect.

**14. Effect of Subject Headings**

Subject headings in this Settlement Agreement are inserted for convenience only, and shall not be construed as interpretations of the text.

**15. Governing Law**

This Settlement Agreement shall be interpreted, governed and construed under the laws of the State of California, including Commission decisions, orders and rulings, as if executed and to be performed wholly within the State of California.

**16. Number of Originals**

This Settlement Agreement is executed in counterparts, each of which shall be deemed an original. The undersigned represent that they are authorized to sign on behalf of the Party represented.

Dated: December 17, 2021

SOUTHERN CALIFORNIA EDISON COMPANY

/s/ Michael Backstrom

By: Michael Backstrom

Title: Vice President, Regulatory Affairs

Dated: December 17, 2021

PUBLIC ADVOCATES OFFICE

/s/ Linda Serizawa

By: Linda Serizawa

Title: Deputy Director

Dated: December 17, 2021

THE UTILITY REFORM NETWORK

/s/ David Cheng

By: David Cheng  
Title: Staff Attorney

Dated: December 17, 2021

SOLAR ENERGY INDUSTRIES ASSOCIATION

/s/ Jeanne Armstrong

By: Jeanne Armstrong  
Title: Senior Regulatory Counsel

Dated: December 17, 2021

CENTER FOR ACCESSIBLE TECHNOLOGY

/s/ Melissa Kasnitz

By: Melissa Kasnitz  
Title: Legal Director

Dated: December 17, 2021

SMALL BUSINESS UTILITY ADVOCATES

/s/ James Birkelund

By: James Birkelund  
Title: President

Dated: December 17, 2021

CALIFORNIA FARM BUREAU FEDERATION

/s/ Karen Norene Mills

By: Karen Norene Mills  
Title: Attorney

Dated: December 17, 2021

WESTERN MANUFACTURED HOUSING  
COMMUNITIES ASSOCIATION

/s/ Edward G. Poole

By: Edward G. Poole  
Title: Attorney

## **Appendix A**

### **Comparison of Party Positions on Residential Rate Design Matters and Settlement**



### Comparison of Parties' Positions Residential Rate Design Issues<sup>1</sup>

Issue	SCE	Cal Advocates	TURN	SEIA	CforAT	WMA	Settled Position
<b>Maintain 60% Basic Baseline Allocation</b>	Maintain the basic baseline allocation at the statutory maximum of 60%	Supports SCE's 60% baseline proposal  Recommends working w/ parties to address changes to baseline before next Phase 2					Maintain the basic baseline allocation at the statutory maximum of 60%
<b>Tiered Rates / TOU-D-4-9PM / TOU-D-5-8PM</b>	Update existing rates using marginal cost and revenue allocation proposals						Adopt SCE's proposals but use revenue allocation for residential customers adopted in the Revenue Allocation Settlement Agreement
<b>TOU Rates w/Legacy TOU periods (TOU-D-T, TOU-D-A, TOU-D-B, TOU-EV-1)</b>	The existing rates will remain available to legacy customers. Update existing rates using marginal cost and revenue allocation proposals						Adopt SCE's proposals but use revenue allocation for residential customers adopted in the Revenue Allocation Settlement Agreement
<b>TOU-D-PRIME Eligibility/ Rate Design</b>	Remove the eligibility restrictions and related attestation requirement  The rate option includes a fixed	Rejects lifting eligibility restrictions as it provides structural benefiter a windfall and lack of incentives to	Opposes to SCE's proposal to lift eligibility restriction	Supports SCE's proposal to open TOU-D-PRIME rates to all customers			Retain eligibility requirement for TOU-D-PRIME. SCE report to the Residential Settling Parties when/if the annual revenue differential reaches the halfway point of the newly determined threshold (current plus \$66M) and will

<sup>1</sup> Note that this comparison does not include the residential rate design issues not covered by this agreement, namely the Real Time Pricing rate design proposals raised by the JARP and SBUA, and SEIA's proposal to increase the rate differentials for Schedules TOU-D-4-9PM and TOU-D-5-8PM.

Issue	SCE	Cal Advocates	TURN	SEIA	CforAT	WMA	Settled Position
	basic charge allows for lower super-off-peak and off-peak rates	adopt clean energy technologies					provide updates for every incremental \$10 million of annual revenue differential thereafter until \$66 million plus the then current level is reached  Basic charge to be set at \$14 per month that will be scaled at the appropriate Functional SAPC scalars in the attrition years
<b>TOU-D-PRIME EV Option Rider</b>	Proposes a rider option under TOU-D-PRIME for separately metered EV loads	Supports rider option for separately metered EV customers; track usage/shortfall					Adopts SCE's proposal to offer rider options for customer with separately metered electric vehicle charge
<b>Heat Pump Water Heater (HPWH)</b>	Proposes incremental baseline allowance for HPWH on TOU-D-4-9 & TOU-D-5-8	Rejects SCE's proposal to increase baseline for HPWH because TOU-D-PRIME exists for customer who adopts clean energy technologies					Approves incremental baseline to be offered to qualified customers on TOU-D-4-9PM and TOU-D-5-8PM if SCE has a record of a HPWH at the location or if a customer can attest they have adopted HPWH technology, including those already receiving an all-electric allowance.
<b>Medical Line-Item Discount</b>		Directs SCE to adopt 11% line-item discount for customers on non-tiered TOU rate + Self-Generation			Recommends SCE adopt rider w/ line-item discount for opt-in rates w/o baseline structure		Approves line-item discount of 11% for eligible customers, including customers enrolled in SGIP, selecting residential non-tiered rate schedules. The line-item discount, along with the exemption of Wildfire Non-bypassable Fund, will be applied to currently available

Issue	SCE	Cal Advocates	TURN	SEIA	CforAT	WMA	Settled Position
		Incentive Program (SGIP)					<p>non-tiered rate options except for options that are closed to new customers, such as the legacy TOU-D-B Option. It will also be made available in conjunction with any newly developed non-tiered rate options</p> <p>ustomers selecting to receive the medical discount on a non-tiered rate would also receive all non-financial benefits provided to Medical Baseline customers, including enhanced notice in advance of a de-energization event.</p>

Issue	SCE	Cal Advocates	TURN	SEIA	CforAT	WMA	Settled Position
<b>Master Meter Discount / Submetering</b>	Master Meter sub-metering discount be based on Multi-family configuration; Total discount = \$0.1850 /unit/day.		Diversity Benefit Adjustment (DBA) for DMS-3 to be added for the next GRC			<p>Master Meter sub-metering discount be based on Single-family configuration; Total discount = \$0.447/unit/day. ¢/day.</p> <p>Recommends SCE to include impact of the current, lower HUC on the DBA component at its next rate change (and when HUC is eliminated)</p>	<p>Use Single-family cost with the exception of FLT &amp; SD which will be at 67%. The average MHP tenant uses 67% of the energy as the avg SF home (based on recent 3 yr avg). Sub metering (Cost of Service) discount calculated to \$0.3032 unit/day. Total discount = 0.2112 ¢/day.</p> <p>SCE to update the DBA according to process outlined in Ordering Paragraph 2 of D.21-03-003.</p> <p>SCE will include a DBA for DMS-3 in the 2025 GRC.</p>
<b>Consolidation of DMS</b>	Proposes to reduce the number of DMS rates by collapsing DMS-1 and DMS-3 into DMS-2 (sometime in 2022/2023)		Rejects SCE's proposal to consolidate DMS rates. (No cost/benefit analysis, no evidence that DMS-1/DMS-3 will benefit)				SCE has agreed to withdraw this proposal.

<p><b>Appendix B</b></p> <p><b>Illustrative Residential Rates</b></p>
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			October 2021 Rates			Proposed 2021 GRC Rates					
			Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
<b>D</b>											
Energy Charge- \$/kWh											
	<b>Baseline - Summer</b>		0.16135	0.09534	0.25669	0.15786	0.09860	0.25646	-2.2%	3.4%	-0.1%
	- Winter		0.16135	0.09534	0.25669	0.15786	0.09860	0.25646	-2.2%	3.4%	-0.1%
	<b>101% - 130% of Baseline - Summer</b>		0.23451	0.09534	0.32985	0.23099	0.09860	0.32959	-1.5%	3.4%	-0.1%
	- Winter		0.23451	0.09534	0.32985	0.23099	0.09860	0.32959	-1.5%	3.4%	-0.1%
	<b>131% - 200% of Baseline - Summer</b>		0.23451	0.09534	0.32985	0.23099	0.09860	0.32959	-1.5%	3.4%	-0.1%
	- Winter		0.23451	0.09534	0.32985	0.23099	0.09860	0.32959	-1.5%	3.4%	-0.1%
	<b>201% - 400% of Baseline - Summer</b>		0.23451	0.09534	0.32985	0.23099	0.09860	0.32959	-1.5%	3.4%	-0.1%
	- Winter		0.23451	0.09534	0.32985	0.23099	0.09860	0.32959	-1.5%	3.4%	-0.1%
	<b>Over 400% of Baseline - Summer</b>		0.31698	0.09534	0.41232	0.31342	0.09860	0.41202	-1.1%	3.4%	-0.1%
	- Winter		0.31698	0.09534	0.41232	0.31342	0.09860	0.41202	-1.1%	3.4%	-0.1%
Basic Charge - \$/day											
	Single-Family Residence		0.031		0.031	0.031		0.031	0.0%		0.0%
	Multi-Family Residence		0.024		0.024	0.024		0.024	0.0%		0.0%
Minimum Charge - \$/day											
	Single Family Residence		0.346		0.346	0.346		0.346	0.0%		0.0%
	Multi-Family Residence		0.346		0.346	0.346		0.346	0.0%		0.0%
Minimum Charge (Medical Baseline) - \$/day											
	Single Family Residence		0.173		0.173	0.173		0.173	0.0%		0.0%
	Multi-Family Residence		0.173		0.173	0.173		0.173	0.0%		0.0%
California Climate Credit			(29.00)		(29.00)	(29.00)		(29.00)	0.0%		0.0%
Smart Energy Program (SEP)											
	Energy Payment - \$/kWh			(0.07000)	(0.07000)		(0.07000)	(0.07000)		0.0%	0.0%
	Capacity Payment - \$/summer day			(0.3275)	(0.3275)		(0.3275)	(0.3275)		0.0%	0.0%
<b>D-CARE</b>											
Energy Charge - \$/kWh											
	<b>Baseline - Summer</b>		0.07848	0.09534	0.17382	0.07515	0.09860	0.17375	-4.2%	3.4%	0.0%
	- Winter		0.07848	0.09534	0.17382	0.07515	0.09860	0.17375	-4.2%	3.4%	0.0%
	<b>101% - 130% of Baseline - Summer</b>		0.12637	0.09534	0.22171	0.12291	0.09860	0.22151	-2.7%	3.4%	-0.1%
	- Winter		0.12637	0.09534	0.22171	0.12291	0.09860	0.22151	-2.7%	3.4%	-0.1%
	<b>131% - 200% of Baseline - Summer</b>		0.12637	0.09534	0.22171	0.12291	0.09860	0.22151	-2.7%	3.4%	-0.1%
	- Winter		0.12637	0.09534	0.22171	0.12291	0.09860	0.22151	-2.7%	3.4%	-0.1%
	<b>201% - 400% of Baseline - Summer</b>		0.12637	0.09534	0.22171	0.12291	0.09860	0.22151	-2.7%	3.4%	-0.1%
	- Winter		0.12637	0.09534	0.22171	0.12291	0.09860	0.22151	-2.7%	3.4%	-0.1%
	<b>Over 400% of Baseline - Summer</b>		0.18180	0.09534	0.27714	0.17831	0.09860	0.27691	-1.9%	3.4%	-0.1%
	- Winter		0.18180	0.09534	0.27714	0.17831	0.09860	0.27691	-1.9%	3.4%	-0.1%
Basic Charge - \$/day											
	Single-Family Residence		0.024		0.024	0.024		0.024	0.0%		0.0%
	Multi-Family Residence		0.018		0.018	0.018		0.018	0.0%		0.0%
Minimum Charge - \$/day											
	Single Family Residence		0.173		0.173	0.173		0.173	0.0%		0.0%
	Multi-Family Residence		0.173		0.173	0.173		0.173	0.0%		0.0%
California Climate Credit			(29.00)		(29.00)	(29.00)		(29.00)	0.0%		0.0%
Smart Energy Program (SEP)											
	Energy Payment - \$/kWh			(0.07000)	(0.07000)		(0.07000)	(0.07000)		0.0%	0.0%
	Capacity Payment - \$/summer day			(0.3275)	(0.3275)		(0.3275)	(0.3275)		0.0%	0.0%
<b>D-SDP</b>											
Air Conditioning Cycling											
	Credit - \$/ton/summer season day										
	50% Cycling		(0.164)		(0.164)	(0.164)		(0.164)	0.0%		0.0%
	100% Cycling		(0.328)		(0.328)	(0.328)		(0.328)	0.0%		0.0%
<b>D-SDP-O</b>											
Air Conditioning Cycling											
	Credit - \$/ton/summer season day										
	50% Cycling		(0.083)		(0.083)	(0.083)		(0.083)	0.0%		0.0%
	100% Cycling		(0.164)		(0.164)	(0.164)		(0.164)	0.0%		0.0%
<b>DE</b>											
Discount - %			25%		25%	25%		25%	0.0%		0.0%

			October 2021 Rates			Proposed 2021 GRC Rates					
			Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
<b>D-FERA</b>											
Energy Charge- \$/kWh											
	<b>Baseline - Summer</b>		0.11473	0.09534	0.21007	0.11170	0.09860	0.21030	-2.6%	3.4%	0.1%
	- Winter		0.11473	0.09534	0.21007	0.11170	0.09860	0.21030	-2.6%	3.4%	0.1%
	<b>101% - 130% of Baseline - Summer</b>		0.17481	0.09534	0.27015	0.17166	0.09860	0.27026	-1.8%	3.4%	0.0%
	- Winter		0.17481	0.09534	0.27015	0.17166	0.09860	0.27026	-1.8%	3.4%	0.0%
	<b>131% - 200% of Baseline - Summer</b>		0.17481	0.09534	0.27015	0.17166	0.09860	0.27026	-1.8%	3.4%	0.0%
	- Winter		0.17481	0.09534	0.27015	0.17166	0.09860	0.27026	-1.8%	3.4%	0.0%
	<b>201% - 400% of Baseline - Summer</b>		0.17481	0.09534	0.27015	0.17166	0.09860	0.27026	-1.8%	3.4%	0.0%
	- Winter		0.17481	0.09534	0.27015	0.17166	0.09860	0.27026	-1.8%	3.4%	0.0%
	<b>Over 400% of Baseline - Summer</b>		0.24235	0.09534	0.33769	0.23926	0.09860	0.33786	-1.3%	3.4%	0.1%
	- Winter		0.24235	0.09534	0.33769	0.23926	0.09860	0.33786	-1.3%	3.4%	0.1%
Basic Charge - \$/day											
	Single-Family Residence		0.025		0.025	0.025		0.025	0.0%		0.0%
	Multi-Family Residence		0.020		0.020	0.020		0.020	0.0%		0.0%
Minimum Charge - \$/day											
	Single Family Residence		0.173		0.173	0.173		0.173	0.0%		0.0%
	Multi-Family Residence		0.173		0.173	0.173		0.173	0.0%		0.0%
California Climate Credit			(29.00)		(29.00)	(29.00)		(29.00)	0.0%		0.0%
Smart Energy Program (SEP)											
	Energy Payment - \$/kWh			(0.07000)	(0.07000)		(0.07000)	(0.07000)		0.0%	0.0%
	Capacity Payment - \$/summer day			(0.3275)	(0.3275)		(0.3275)	(0.3275)		0.0%	0.0%
<b>DM</b>											
Diversity Adjustment - \$/unit/day			0.094		0.094	0.084		0.084	-10.6%		-10.6%
Agricultural Employee Housing Discount - %			100.00%		100.00%	100.00%		100.00%	0.0%		0.0%
<b>DMS-1</b>											
Submeter Discount - \$/unit/day			(0.073)		(0.073)	(0.085)		(0.085)	16.9%		16.9%
Diversity Adjustment - \$/unit/day			0.094		0.094	0.084		0.084	-10.6%		-10.6%
Basic Charge Adjustment - \$/unit/day			0.024		0.024	0.024		0.024	0.0%		0.0%
Basic Charge Adjustment CARE - \$/unit/day			0.018		0.018	0.018		0.018	0.0%		0.0%
Basic Charge Adjustment FERA - \$/unit/day			0.020		0.020	0.020		0.020	0.0%		0.0%
<b>DMS-2</b>											
Submeter Discount - \$/unit/day			(0.257)		(0.257)	(0.303)		(0.303)	17.9%		17.9%
Diversity Adjustment - \$/unit/day			0.094		0.094	0.084		0.084	-10.6%		-10.6%
Basic Charge Adjustment - \$/unit/day			0.024		0.024	0.024		0.024	0.0%		0.0%
Basic Charge Adjustment CARE - \$/unit/day			0.018		0.018	0.018		0.018	0.0%		0.0%
Basic Charge Adjustment FERA - \$/unit/day			0.020		0.020	0.020		0.020	0.0%		0.0%
<b>DMS-3</b>											
Basic Charge Adjustment - \$/unit/day			0.024	0.000	0.024	0.024	0.000	0.024	0.0%		0.0%
Basic Charge Adjustment CARE - \$/unit/day			0.018		0.018	0.018		0.018	0.0%		0.0%
Basic Charge Adjustment FERA - \$/unit/day			0.020		0.020	0.020		0.020	0.0%		0.0%
<b>TOU-D-Rate A</b>											
Energy Charge - \$/kWh											
	Summer Season - On-Peak		0.43581	0.23630	0.67211	0.42180	0.22788	0.64968	-3.2%	-3.6%	-3.3%
	Off-Peak		0.30560	0.08080	0.38640	0.32315	0.09518	0.41833	5.7%	17.8%	8.3%
	Super-Off-Peak		0.10588	0.06244	0.16832	0.09790	0.06705	0.16495	-7.5%	7.4%	-2.0%
	Winter Season - On-Peak		0.29714	0.13961	0.43675	0.28253	0.13536	0.41789	-4.9%	-3.0%	-4.3%
	Off-Peak		0.26307	0.07028	0.33335	0.27225	0.07248	0.34473	3.5%	3.1%	3.4%
	Super-Off-Peak		0.10600	0.06346	0.16946	0.09451	0.06859	0.16310	-10.8%	8.1%	-3.8%
Basic Charge - \$/day											
	Single-Family Residence		0.031	0.000	0.031	0.031	0.000	0.031	0.0%		0.0%
	Multi-Family Residence		0.024	0.000	0.024	0.024	0.000	0.024	0.0%		0.0%
Minimum Charge - \$/day											
	Single Family Residence		0.346	0.000	0.346	0.346	0.000	0.346	0.0%		0.0%
	Multi-Family Residence		0.346	0.000	0.346	0.346	0.000	0.346	0.0%		0.0%
Minimum Charge (Medical Baseline) - \$/day											
	Single Family Residence		0.173		0.173	0.173		0.173	0.0%		0.0%
	Multi-Family Residence		0.173		0.173	0.173		0.173	0.0%		0.0%
California Climate Credit			(29.00)	0.00	(29.00)	(29.00)	0.00	(29.00)	0.0%		0.0%
Baseline Credit - \$/kWh			(0.07991)	0.00000	(0.07991)	(0.08003)	0.00000	(0.08003)	0.2%		0.2%
California Alternate Rates for Energy Discount - %			100%		100.00%	100%		100%	0.0%		0.0%
Family Electric Rate Assistance Discount - %			100%		100.00%	100%		100%	0.0%		0.0%
Smart Energy Program (SEP)											
	Energy Payment - \$/kWh			(0.07000)	(0.07000)		(0.07000)	(0.07000)		0.0%	0.0%
	Capacity Payment - \$/summer day			(0.3275)	(0.3275)		(0.3275)	(0.3275)		0.0%	0.0%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
<b>TOU-D-Rate B</b>									
Energy Charge - \$/kWh									
Summer Season - On-Peak	0.20727	0.34601	0.55328	0.21288	0.33881	0.55169	2.7%	-2.1%	-0.3%
Off-Peak	0.13020	0.08080	0.21100	0.15739	0.09518	0.25257	20.9%	17.8%	19.7%
Super-Off-Peak	0.10595	0.03725	0.14320	0.09579	0.03905	0.13484	-9.6%	4.8%	-5.8%
Winter Season - On-Peak	0.20727	0.11321	0.32048	0.21288	0.11921	0.33209	2.7%	5.3%	3.6%
Off-Peak	0.13020	0.07028	0.20048	0.15739	0.07248	0.22987	20.9%	3.1%	14.7%
Super-Off-Peak	0.10595	0.03786	0.14381	0.09579	0.03995	0.13574	-9.6%	5.5%	-5.6%
Customer Charge - \$/day	0.872	0.000	0.872	0.682	0.000	0.682	-21.8%		-21.8%
California Alternate Rates for									
Energy Discount - %	100%		100.00%	100%		100%	0.0%		0.0%
Family Electric Rate Assistance Discount - %	100%			100%		100%	0.0%		
Smart Energy Program (SEP)									
Energy Payment - \$/kWh		(0.07000)	(0.07000)		(0.07000)	(0.07000)		0.0%	0.0%
Capacity Payment - \$/summer day		(0.3275)	(0.3275)		(0.3275)	(0.3275)		0.0%	0.0%
California Climate Credit	(29.00)	0.00	(29.00)	(29.00)	0.00	(29.00)	0.0%		0.0%
<b>TOU-D-Rate PRIME</b>									
Energy Charge - \$/kWh									
Summer Season - On-Peak	0.24589	0.23592	0.48181	0.21397	0.25640	0.47037	-13.0%	8.7%	-2.4%
Mid-Peak	0.24589	0.12018	0.36607	0.21397	0.09125	0.30522	-13.0%	-24.1%	-16.6%
Off-Peak	0.13855	0.05582	0.19437	0.14301	0.06092	0.20393	3.2%	9.1%	4.9%
Winter Season - Mid-Peak	0.24931	0.19960	0.44891	0.21955	0.21432	0.43387	-11.9%	7.4%	-3.4%
Off-Peak	0.13464	0.05158	0.18622	0.13720	0.05173	0.18893	1.9%	0.3%	1.5%
Super-Off-Peak	0.13464	0.05158	0.18622	0.13720	0.05173	0.18893	1.9%	0.3%	1.5%
Customer Charge - \$/day	0.395	0.000	0.395	0.460	0.000	0.460	16.5%		16.5%
California Alternate Rates for									
Energy Discount - %	100%		100.00%	100%		100%	0.0%		0.0%
Family Electric Rate Assistance Discount - %	100%		100.00%	100%		100%	0.0%		0.0%
Smart Energy Program (SEP)									
Energy Payment - \$/kWh		(0.07000)	(0.07000)		(0.07000)	(0.07000)		0.0%	0.0%
Capacity Payment - \$/summer day		(0.3275)	(0.32750)		(0.3275)	(0.3275)		0.0%	0.0%
California Climate Credit	(29.00)	0.00	(29.00)	(29.00)	0.00	(29.00)	0.0%		0.0%
<b>TOU-Default-1 (4-9pm)</b>									
Energy Charge - \$/kWh									
Summer Season - On-Peak	0.28974	0.18457	0.47431	0.26797	0.20596	0.47393	-7.5%	11.6%	-0.1%
Mid-Peak	0.28974	0.09513	0.38487	0.26797	0.11710	0.38507	-7.5%	23.1%	0.1%
Off-Peak	0.22388	0.07291	0.29679	0.22948	0.06673	0.29621	2.5%	-8.5%	-0.2%
Winter Season - Mid-Peak	0.28974	0.12463	0.41437	0.26797	0.14717	0.41514	-7.5%	18.1%	0.2%
Off-Peak	0.22388	0.09033	0.31421	0.22948	0.08546	0.31494	2.5%	-5.4%	0.2%
Super-Off-Peak	0.21604	0.06935	0.28539	0.21570	0.07061	0.28631	-0.2%	1.8%	0.3%
Basic Charge - \$/day									
Single-Family Residence	0.031	0.000	0.031	0.031	0.000	0.031	0.0%		0.0%
Multi-Family Residence	0.024	0.000	0.024	0.024	0.000	0.024	0.0%		0.0%
Minimum Charge - \$/day									
Single Family Residence	0.346	0.000	0.346	0.346	0.000	0.346	0.0%		0.0%
Multi-Family Residence	0.346	0.000	0.346	0.346	0.000	0.346	0.0%		0.0%
Minimum Charge (Medical Baseline) - \$/day									
Single Family Residence	0.173	0.000	0.173	0.173	0.000	0.173	0.0%		0.0%
Multi-Family Residence	0.173	0.000	0.173	0.173	0.000	0.173	0.0%		0.0%
California Climate Credit	(29.00)	0.00	(29.00)	(29.00)	0.00	(29.00)	0.0%		0.0%
Baseline Credit - \$/kWh	(0.07991)	0.00000	(0.07991)	(0.08003)	0.00000	(0.08003)	0.2%		0.2%
California Alternate Rates for									
Energy Discount - %	100%		100%	100%		100%	0.0%		0.0%
Family Electric Rate Assistance Discount - %	100%		100%	100%		100%	0.0%		0.0%
Smart Energy Program (SEP)									
Energy Payment - \$/kWh		(0.07000)	(0.07000)		(0.07000)	(0.07000)		0.0%	0.0%
Capacity Payment - \$/summer day		(0.3275)	(0.3275)		(0.3275)	(0.3275)		0.0%	0.0%



	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
<b>TOU-Default-2 (5-8pm)</b>									
Energy Charge - \$/kWh									
Summer Season - On-Peak	0.30065	0.29290	0.59355	0.27043	0.31941	0.58984	-10.1%	9.1%	-0.6%
Mid-Peak	0.30065	0.14350	0.44415	0.27043	0.17195	0.44238	-10.1%	19.8%	-0.4%
Off-Peak	0.23293	0.06317	0.29610	0.23542	0.05950	0.29492	1.1%	-5.8%	-0.4%
Winter Season - Mid-Peak	0.30065	0.18586	0.48651	0.27043	0.21583	0.48626	-10.1%	16.1%	-0.1%
Off-Peak	0.23293	0.08678	0.31971	0.23542	0.08412	0.31954	1.1%	-3.1%	-0.1%
Super-Off-Peak	0.21652	0.06149	0.27801	0.21646	0.06140	0.27786	0.0%	-0.1%	-0.1%
Basic Charge - \$/day									
Single-Family Residence	0.031	0.000	0.031	0.031	0.000	0.031	0.0%		0.0%
Multi-Family Residence	0.024	0.000	0.024	0.024	0.000	0.024	0.0%		0.0%
Minimum Charge - \$/day									
Single Family Residence	0.346	0.000	0.346	0.346	0.000	0.346	0.0%		0.0%
Multi-Family Residence	0.346	0.000	0.346	0.346	0.000	0.346	0.0%		0.0%
Minimum Charge (Medical Baseline) - \$/day									
Single Family Residence	0.173		0.173	0.173		0.173	0.0%		0.0%
Multi-Family Residence	0.173		0.173	0.173		0.173	0.0%		0.0%
California Climate Credit	(29.00)	0.00	(29.00)	(29.00)	0.00	(29.00)	0.0%		0.0%
Baseline Credit - \$/kWh	(0.07991)	0.00000	(0.07991)	(0.08003)	0.00000	(0.08003)	0.2%		0.2%
California Alternate Rates for									
Energy Discount - %	100%		100%	100%		100%	0.0%		0.0%
Family Electric Rate Assistance Discount - %	100%		100%	100%		100%	0.0%		0.0%
Smart Energy Program (SEP)									
Energy Payment - \$/kWh		(0.07000)	(0.07000)		(0.07000)	(0.07000)		0.0%	0.0%
Capacity Payment - \$/summer day		(0.3275)	(0.3275)		(0.3275)	(0.3275)		0.0%	0.0%
<b>TOU-D-T</b>									
Energy Charge - \$/kWh									
Summer Season									
Level I (up to 130% of Baseline) - On-Peak	0.32028	0.12837	0.44865	0.23706	0.12497	0.36203	-26.0%	-2.6%	-19.3%
Level II (More than 130% of Baseline) - On-Peak	0.37826	0.12837	0.50663	0.28437	0.12497	0.40934	-24.8%	-2.6%	-19.2%
Level I (up to 130% of Baseline) - Off-Peak	0.17055	0.11670	0.28725	0.15878	0.11361	0.27239	-6.9%	-2.6%	-5.2%
Level II (More than 130% of Baseline) - Off-Peak	0.21018	0.11670	0.32688	0.18857	0.11361	0.30218	-10.3%	-2.6%	-7.6%
Winter Season									
Level I (up to 130% of Baseline) - On-Peak	0.17786	0.08720	0.26506	0.16424	0.09481	0.25905	-7.7%	8.7%	-2.3%
Level II (More than 130% of Baseline) - On-Peak	0.23584	0.08720	0.32304	0.21155	0.09481	0.30636	-10.3%	8.7%	-5.2%
Level I (up to 130% of Baseline) - Off-Peak	0.14680	0.07928	0.22608	0.15086	0.08619	0.23705	2.8%	8.7%	4.9%
Level II (More than 130% of Baseline) - Off-Peak	0.18643	0.07928	0.26571	0.18065	0.08619	0.26684	-3.1%	8.7%	0.4%
Basic Charge - \$/day									
Single-Family Residence	0.031	0.000	0.031	0.031	0.000	0.031	0.0%		0.0%
Multi-Family Residence	0.024	0.000	0.024	0.024	0.000	0.024	0.0%		0.0%
Minimum Charge - \$/day									
Single Family Residence	0.346	0.000	0.346	0.346	0.000	0.346	0.0%		0.0%
Multi-Family Residence	0.346	0.000	0.346	0.346	0.000	0.346	0.0%		0.0%
Minimum Charge (Medical Baseline) - \$/day									
Single Family Residence	0.173		0.173	0.173		0.173	0.0%		0.0%
Multi-Family Residence	0.173		0.173	0.173		0.173	0.0%		0.0%
California Climate Credit	(29.00)	0.00	(29.00)	(29.00)	0.00	(29.00)	0.0%		0.0%
Smart Energy Program (SEP)									
Energy Payment - \$/kWh		(0.07000)	(0.07000)		(0.07000)	(0.07000)		0.0%	0.0%
Capacity Payment - \$/summer day		(0.3275)	(0.3275)		(0.3275)	(0.3275)		0.0%	0.0%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
<b>TOU-D-T-CPP</b>									
Energy Charge - \$/kWh									
Summer Season									
Level I (up to 130% of Baseline) - On-Peak	0.32028	0.12837	0.44865	0.23706	0.12497	0.36203	-26.0%	-2.6%	-19.3%
Level II (More than 130% of Baseline) - On-Peak	0.37826	0.12837	0.50663	0.28437	0.12497	0.40934	-24.8%	-2.6%	-19.2%
Level I (up to 130% of Baseline) - Off-Peak	0.17055	0.11670	0.28725	0.15878	0.11361	0.27239	-6.9%	-2.6%	-5.2%
Level II (More than 130% of Baseline) - Off-Peak	0.21018	0.11670	0.32688	0.18857	0.11361	0.30218	-10.3%	-2.6%	-7.6%
Winter Season									
Level I (up to 130% of Baseline) - On-Peak	0.17786	0.08720	0.26506	0.16424	0.09481	0.25905	-7.7%	8.7%	-2.3%
Level II (More than 130% of Baseline) - On-Peak	0.23584	0.08720	0.32304	0.21155	0.09481	0.30636	-10.3%	8.7%	-5.2%
Level I (up to 130% of Baseline) - Off-Peak	0.14680	0.07928	0.22608	0.15086	0.08619	0.23705	2.8%	8.7%	4.9%
Level II (More than 130% of Baseline) - Off-Peak	0.18643	0.07928	0.26571	0.18065	0.08619	0.26684	-3.1%	8.7%	0.4%
Basic Charge - \$/day									
Single-Family Residence	0.031	0.000	0.031	0.031	0.000	0.031	0.0%		0.0%
Multi-Family Residence	0.024	0.000	0.024	0.024	0.000	0.024	0.0%		0.0%
Minimum Charge - \$/day									
Single Family Residence	0.346	0.000	0.346	0.346	0.000	0.346	0.0%		0.0%
Multi-Family Residence	0.346	0.000	0.346	0.346	0.000	0.346	0.0%		0.0%
Minimum Charge (Medical Baseline) - \$/day									
Single Family Residence	0.173		0.173	0.173		0.173	0.0%		0.0%
Multi-Family Residence	0.173		0.173	0.173		0.173	0.0%		0.0%
California Climate Credit	(29.00)	0.00	(29.00)	(29.00)	0.00	(29.00)	0.0%		0.0%
Smart Energy Program (SEP)									
Energy Payment - \$/kWh		(0.07000)	(0.07000)		(0.07000)	(0.07000)		0.0%	0.0%
Capacity Payment - \$/summer day		(0.3275)	(0.3275)		(0.3275)	(0.3275)		0.0%	0.0%
CPP Event Energy Charge - \$/kWh		0.80000	0.80000		0.80000	0.80000		0.0%	0.0%
Summer CPP Non-Event Credit									
Summer On-Peak Energy Credit - \$/kWh		-0.15170	(0.15170)		-0.15170	-0.15170		0.0%	0.0%
<b>TOU-EV-1</b>									
Energy Charge - \$/kWh									
Summer Season - On-Peak	0.32503	0.23213	0.55716	0.33856	0.23711	0.57567	4.2%	2.1%	3.3%
Off-Peak	0.11411	0.03543	0.14954	0.10465	0.03872	0.14337	-8.3%	9.3%	-4.1%
Winter Season - On-Peak	0.22040	0.09650	0.31690	0.22845	0.09721	0.32566	3.7%	0.7%	2.8%
Off-Peak	0.10858	0.04276	0.15134	0.09640	0.04797	0.14437	-11.2%	12.2%	-4.6%
Meter Charge - \$/month	3.66	0.00	3.66	3.16	0.00	3.16	-13.7%		-13.7%
<b>Optional CPP rider &lt; 200 kW</b>									
CPP Event Energy Charge - \$/kWh									
DOMESTIC	0.00000	0.80000	0.80000	0.00000	0.80000	0.80000		0.0%	0.0%
DOMESTIC CARE	0.00000	0.80000	0.80000	0.00000	0.80000	0.80000		0.0%	0.0%
Summer Non-Event Energy Credit - \$/kWh									
DOMESTIC (Summer On-Peak Energy Credit)	0.00000	(0.15170)	(0.15170)	0.00000	(0.15170)	(0.15170)		0.0%	0.0%
DOMESTIC CARE (Summer On-Peak Energy Credit)	0.00000	(0.15170)	(0.15170)	0.00000	(0.15170)	(0.15170)		0.0%	0.0%

## **Appendix C**

### **Present and Proposed Baseline Allowances**

**CURRENT**  
**(7-Year Average 2010-2016)**

Summer kWh per Day			Winter kWh per Day		
Baseline Region	Basic	All Electric	Baseline Region	Basic	All Electric
05	13.7	17.9	05	18.7	29.1
06	11.4	8.8	06	11.3	13.0
08	12.6	9.8	08	10.6	12.7
09	16.5	12.4	09	12.3	14.3
10	18.9	15.8	10	12.5	17.0
13	22.0	24.6	13	12.6	24.3
14	18.7	18.3	14	12.0	21.3
15	46.4	24.1	15	9.9	18.2
16	14.4	13.5	16	12.6	23.1

**PROPOSED**  
**(10 Year Average 2010-2019)**

Summer kWh per Day			Winter kWh per Day		
Baseline Region	Basic	All Electric	Baseline Region	Basic	All Electric
05	17.0	16.8	05	18.4	27.0
06	11.4	8.7	06	11.0	12.6
08	12.8	9.9	08	10.3	12.3
09	16.9	12.5	09	12.0	13.9
10	19.3	15.9	10	12.1	16.4
13	22.2	24.2	13	12.2	23.0
14	19.2	18.5	14	11.9	21.1
15	45.0	24.0	15	9.7	17.4
16	14.7	13.5	16	12.4	23.2

## **Appendix D**

### **Sub-Metering Discount and Diversity Benefit Adjustment Calculations**

## Sub-Metering Discount

	A	B	G	H	J	L	M	P	Q	R	S	Z
RECC												
All values are 2019\$ unless noted otherwise	Capital Investment			Annualized Capital Costs Including Loaders			Annual O&M and Customer Services		Total Customer Costs including working capital			
		Final Line Trans (#368)	Service drop (#369)	Meter (#370)	FLT + Service Drop + Meter (weighted by %)			Total O&M & Customer Services	Annual per Customer Cost 2019\$	Annual per Customer Cost 2021\$	Daily Sub-meter Discount	
Single UG		613.34	394.24	142.29	119.03			17.50	136.53	146.20		
Agreed to MHP calcs		410.94	264.14	142.29	85.84			17.50	103.34	110.66	30.32	

The Sub-Metering Discount will be based on the Single-Family Underground costs as determined by the current Typical Customer Study as presented in the SCE-02 workpapers. The costs of the Final Line Transformer and Service Drop will be set at 67 percent of the full costs to reflect the fact that mobile home tenants use 67 percent of the energy of a Single-Family residence as determined by historical usage for year 2018 through 2020.

In formulaic terms: Sum of FLT + SD (columns G&H) \* 67% + Meter (column J); these Capital Investments cost dollars are annualized by RECC and loader values (column M); add in O&M and Customer Service costs (column P) and multiple the sum by the working capital factor (currently 0 percent) to arrive at a subtotal value (column R); the value in column R is then escalated to the appropriate year for a Total value (column S). This Total value is then divided by 365 days for a cents/per day value (column Z).

### Diversity Benefit Adjustment (DBA)

The following table is demonstrative and was presented during settlement discussion and shows the Sub-metering Discount, Diversity Benefit Adjustment and other components used in calculating the Net Discount applied to master metered mobile home parks. It is presented to provide clarity to the process. The Diversity Benefit Adjustment shown in the table below reflects Residential rate designs agreed to in this settlement agreement, will be updated when SCE implements Residential rates as part of GRC Phase 2, and further updated to reflect the HUC eliminations per D.21-03-003. The Basic Charge value will be determined at the conclusion of the GRC Residential rate settlement discussions and updated at that time.

	A	B	C	D	A -B +C -D	E
	Cost of Service \$/mo. <sup>1</sup>	Diversity Benefit Adj (DBA) \$/mo. <sup>2</sup>	Line Loss Adj \$/mo.	Basic Charge \$/mo. <sup>3</sup>	Net Discount \$/mo. <sup>4</sup>	Daily Equivalent \$/day
WMA/SCE/TURN Settlement	\$9.22	\$2.56	\$0.18	\$0.73	\$6.11	\$0.201

#### Notes:

- 1) The monthly charge of \$9.22 is calculated by multiplying the daily sub-metering discount value of \$0.30.32 cents/day by 30.417 average days per month (365/12).
- 2) DBA value shown here is based on October 2021 rates per MCRA Settlement. When GRC Residential rates finalized and the HUC is removed, the DBA value will be adjusted accordingly as outlined in D.21-03-003.
- 3) The Basic Charge \$/mo. Will be determine with GRC Residential rates are finalized.
- 4) The formula outline above is as follows: A -B + C -D = Net Discount \$/mo.

## **Appendix E**

### **Heat Pump Water Heater Incremental Baseline Allowance Derivation**

Zone	Incremental Daily Baseline Allowance (kWh)		Daily Heat Pump Water Heater Usage (kWh)	
	Summer	Winter	Summer	Winter
Basic				
05	1.9	2.6	3.2	4.3
06	1.9	2.6	3.2	4.3
08	1.9	2.6	3.2	4.3
09	1.7	2.5	2.9	4.2
10	1.7	2.5	2.8	4.2
13	1.7	2.5	2.9	4.2
14	1.7	2.5	2.9	4.2
15	1.7	2.5	2.8	4.2
16	1.9	2.6	3.2	4.3
Maximum	<b>1.9</b>	<b>2.6</b>		

All Electric				
05	1.9	3.0	3.2	4.3
06	1.9	3.0	3.2	4.3
08	1.9	3.0	3.2	4.3
09	1.7	2.9	2.9	4.2
10	1.7	3.0	2.8	4.2
13	1.7	2.9	2.9	4.2
14	1.7	2.9	2.9	4.2
15	1.7	3.0	2.8	4.2
16	1.9	3.0	3.2	4.3
Maximum	<b>1.9</b>	<b>3.0</b>		



## **Appendix F**

### **Comparison of Party Positions on Small Commercial Rate Design Matters and Settlement**

### Comparison of Positions Small Commercial Rate Design Issues<sup>1</sup>

	SCE	Cal Advocates	TURN	SBUA	2021 GRC Settled Position
TOU-GS-1, Option E Rate Design (Base Rate)	<ul style="list-style-type: none"> <li>Energy charges based on marginal costs and revenue allocations from Exhibits SCE-02 and SCE-03.</li> <li>Maintain “all volumetric” energy rate structure (<i>i.e.</i>, no demand charges) with a 2.88 on/off peak rate differential ratio in summer and a 2.28 mid/SOP ratio in winter</li> <li>~\$19/mo customer charge to recover customer-related distribution marginal costs (use RECC)</li> </ul>	<ul style="list-style-type: none"> <li>Proposes \$4.75 /mo customer charge using own marginal costs (use NCO), reject SCE’s proposal to apply EPMC scalar for TOU-GS-1 customer charge</li> <li>Maintain SCE’s proposed TOU rate differentials between the summer on- &amp; off-peak and winter mid- &amp; super-off-peak</li> </ul>		<ul style="list-style-type: none"> <li>Supports Cal Advocates’ proposal of monthly charge and apply the EPMC scalar to distribution volumetric rates</li> </ul>	<ul style="list-style-type: none"> <li>Customer charge to be set at \$14.25 during implementation and shall remain fixed during the attrition years.</li> <li>Energy charges to have moderated seasonal differentials</li> </ul>
TOU-GS-1, Option D (Optional Rate)	<ul style="list-style-type: none"> <li>Rate design using marginal costs and revenue allocations from Exhibits SCE-02 and SCE-03.</li> <li>For generation energy, recover via TOU energy charges.</li> <li>For generation capacity, summer on-peak and winter mid-peak costs are recovered via TRD charges; summer mid-peak and off-peak costs are recovered via TOU energy charges</li> <li>Time-differentiated distribution by recovering 50% of peak-</li> </ul>			<ul style="list-style-type: none"> <li>Supports Cal Advocates’ proposal of monthly charge and apply the EPMC scalar to distribution volumetric rates</li> </ul>	<ul style="list-style-type: none"> <li>Customer charge to be set at \$14.25 during implementation and shall remain fixed during the attrition years.</li> <li>Adopt SCE’s proposal on other rate design elements</li> </ul>

<sup>1</sup> Note that this comparison does not include the small commercial rate design issues not covered by this agreement, namely the Real Time Pricing rate design proposals raised by the JARP and SBUA.

	SCE	Cal Advocates	TURN	SBUA	2021 GRC Settled Position
	<p>related distribution design demand costs in smoothed TOU energy charges, and the balance for summer on-peak via a TRD charge and the balance of all other periods via an FRD charge; recover 100% of grid-related distribution design demand costs via an FRD charge</p> <ul style="list-style-type: none"> <li>• ~\$19/mo customer charge to recover customer-related distribution marginal costs (use RECC)</li> </ul>				
TOU-GS-1 Option LG (Optional rate for RES-BCT Generating Accounts Only)	<ul style="list-style-type: none"> <li>• Rate design using marginal costs and revenue allocations from Exhibits SCE-02 and SCE-03.</li> </ul>			<ul style="list-style-type: none"> <li>• Supports Cal Advocates' proposal of monthly charge and apply the EPMC scalar to distribution volumetric rates</li> </ul>	<ul style="list-style-type: none"> <li>• Customer charge to be set at \$14.25 during implementation and shall remain fixed during the attrition years.</li> <li>• Adopt SCE's proposal on other rate design elements</li> </ul>
TOU-GS-1, Option ES (Optional Rate available only to customers who install BTM storage)	<ul style="list-style-type: none"> <li>• Rate design using marginal costs and revenue allocations from Exhibits SCE-02 and SCE-03.</li> </ul>				<ul style="list-style-type: none"> <li>• Customer charge to be set at \$31 during implementation and subsequently scaled in the attrition years using the SAPC scalar excluding wildfire-related cost</li> </ul>
TOU Rates w/Legacy TOU periods (Option A, B, and C)	<ul style="list-style-type: none"> <li>• The existing rates will remain available to legacy customers. Update existing rates using marginal cost and revenue allocation proposals</li> </ul>				<ul style="list-style-type: none"> <li>• Adopt SCE's proposals but use revenue allocation for small commercial customers adopted in the Revenue Allocation Settlement Agreement</li> </ul>
TOU-EV-7	<ul style="list-style-type: none"> <li>• Rate design using marginal costs and revenue allocations from Exhibits SCE-02 and SCE-03.</li> <li>• Grandfather existing demand charge provision for customers that have an EV account</li> </ul>			<ul style="list-style-type: none"> <li>• If the Commission approves SCE's proposed monthly credit for customers on TOU-D-PRIME, then a similar monthly credit should be made available to TOU-EV-7</li> </ul>	<ul style="list-style-type: none"> <li>• Adopt SBUA's proposal to adopt a monthly credit to the TOU-EV-7 customer charge. The customer charge for TOU-EV-7 shall be set at \$7.33. The reduced customer charge is intended to recover the cost of the additional meter and associated on-going customer service costs, while recognizing that for a portion of TOU-EV-7</li> </ul>

	<b>SCE</b>	<b>Cal Advocates</b>	<b>TURN</b>	<b>SBUA</b>	<b>2021 GRC Settled Position</b>
	located on the same premises as the non-EV host account so that the EV customer is not responsible for paying the FRD charges registered on the EV account if the non-EV account's monthly maximum demand is higher than the monthly maximum demand registered on the EV account's meter				customers, the service point and other associated facility costs are recovered through the customer charge of the primary (main site) infrastructure. The revenue deficiency generated by this customer charge benefit will be collected through TOU energy charges in order to maintain a revenue neutral rate design.
Closing of non-TOU GS-1 rate	<ul style="list-style-type: none"> <li>SCE plans to replace the meters on Catalina with Edison SmartConnect (ESC) meters in 2022 and migrate these customers to their applicable TOU-GS-1 rate schedule in 2024/2025. SCE shall close Schedule GS-1 upon the completion of the transition.</li> </ul>				<ul style="list-style-type: none"> <li>Adopt SCE's uncontested proposal</li> </ul>
Small Business Demand Threshold	<ul style="list-style-type: none"> <li>Presented a study on whether to increase the monthly demand level which divides its small and medium General Service customer into the TOU-GS-1 and TOU-GS-2 rate classes. (Appendix J of Exhibit SCE-04)</li> <li>Proposed no changes to the existing 20 kW small business demand eligibility threshold for service on TOU-GS-1 rates</li> </ul>			<ul style="list-style-type: none"> <li>SCE should consolidate GS-1 and GS-2 customer classes in this proceeding.</li> <li>Recommend customer charges be differentiated between single-phase, three-phase, and primary voltage customers</li> </ul>	<ul style="list-style-type: none"> <li>In collaboration with SBUA and all interested parties, SCE shall conduct a study to assess the feasibility and customer impacts of each of the following potential changes to the GS-1 classification. <ol style="list-style-type: none"> <li>Modify existing 20KW monthly maximum demand for GS-1 rate group</li> <li>Reclassify or consolidate the GS-1/GS-2 rate groups into a single rate group</li> <li>Migrate existing lighting load on the GS-1 rate to other applicable lighting rate schedules or a new lighting</li> </ol> </li> </ul>

	<b>SCE</b>	<b>Cal Advocates</b>	<b>TURN</b>	<b>SBUA</b>	<b>2021 GRC Settled Position</b>
					and common services rate schedule

## **Appendix G**

### **Illustrative Small Commercial Rate Group Rates**

			October 2021 Rates			Proposed 2021 GRC Rates					
			Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
<b>GS-1</b>											
Energy Charge - \$/kWh	Summer		0.12691	0.12531	0.25222	0.13369	0.11484	0.24853	5.3%	-8.4%	-1.5%
	Winter		0.12387	0.07963	0.20350	0.12680	0.07732	0.20412	2.4%	-2.9%	0.3%
Customer Charge - \$/day			0.555		0.555	0.468		0.468	-15.7%		-15.7%
Three Phase Service - \$/day			0.031		0.031	0.043		0.043	38.7%		38.7%
Voltage Discount, Energy - \$/kWh											
	From 2 kV to 50 kV		(0.00100)	(0.00135)	(0.00235)	(0.00135)	(0.00129)	(0.00264)	35.0%	-4.4%	12.3%
	From 51 kV to 219 kV		(0.03353)	(0.00296)	(0.03649)	(0.02771)	(0.00281)	(0.03052)	-17.4%	-5.1%	-16.4%
	220 kV and above		(0.07276)	(0.00299)	(0.07575)	(0.07748)	(0.00284)	(0.08032)	6.5%	-5.0%	6.0%
California Climate Credit - \$/kWh/Meter/Month			(0.00316)	0.00000	(0.00316)	(0.00316)	0.00000	(0.00316)	0.0%		0.0%
<b>TOU-GS-1 (Rate E)</b>											
Energy Charge - \$/kWh											
	Summer Season										
	On-Peak		0.17133	0.31989	0.49122	0.16269	0.34912	0.51181	-5.0%	9.1%	4.2%
	Mid-peak		0.17133	0.12767	0.29900	0.16269	0.09014	0.25283	-5.0%	-29.4%	-15.4%
	Off-Peak		0.11334	0.08094	0.19428	0.12473	0.06394	0.18867	10.0%	-21.0%	-2.9%
	Winter Season										
	Mid-peak		0.17133	0.14772	0.31905	0.16269	0.13953	0.30222	-5.0%	-5.5%	-5.3%
	Off-Peak		0.11334	0.07096	0.18430	0.12473	0.07659	0.20132	10.0%	7.9%	9.2%
	Super-Off-Peak		0.10465	0.04548	0.15013	0.10705	0.04020	0.14725	2.3%	-11.6%	-1.9%
Customer Charge - \$/day			0.555	0.000	0.555	0.468	0.000	0.468	-15.7%		-15.7%
Three-Phase Service - \$/day			0.031	0.000	0.031	0.043	0.000	0.043	38.7%		38.7%
Voltage Discount, Energy - \$/kWh											
	From 2 kV to 50 kV		(0.00100)	(0.00135)	(0.00235)	(0.00135)	(0.00129)	(0.00264)	35.0%	-4.4%	12.3%
	From 51 kV to 219 kV		(0.03353)	(0.00296)	(0.03649)	(0.02771)	(0.00281)	(0.03052)	-17.4%	-5.1%	-16.4%
	220 kV and above		(0.07276)	(0.00299)	(0.07575)	(0.07748)	(0.00284)	(0.08032)	6.5%	-5.0%	6.0%
California Climate Credit - \$/kWh/Meter/Month			(0.00316)	0.00000	(0.00316)	(0.00316)	0.00000	(0.00316)	0.0%		0.0%
<b>TOU-GS-1 (Rate ES)</b>											
Energy Charge - \$/kWh											
	Summer Season										
	On-Peak		0.26596	0.44088	0.70684	0.25717	0.36841	0.62558	-3.3%	-16.4%	-11.5%
	Mid-peak		0.15917	0.14308	0.30225	0.17033	0.09512	0.26545	7.0%	-33.5%	-12.2%
	Off-Peak		0.10483	0.06110	0.16593	0.12604	0.06747	0.19351	20.2%	10.4%	16.6%
	Winter Season										
	Mid-peak		0.10693	0.13967	0.24660	0.09035	0.13293	0.22328	-15.5%	-4.8%	-9.5%
	Off-Peak		0.07635	0.06708	0.14343	0.08146	0.07297	0.15443	6.7%	8.8%	7.7%
	Super-Off-Peak		0.08250	0.04299	0.12549	0.08763	0.03830	0.12593	6.2%	-10.9%	0.4%
Customer Charge - \$/day			1.210	0.000	1.210	1.021	0.000	1.021	-15.6%		-15.6%
Three-Phase Service - \$/day			0.031	0.000	0.031	0.043	0.000	0.043	38.7%		38.7%
Voltage Discount, Energy - \$/kWh											
	From 2 kV to 50 kV		(0.00100)	(0.00135)	(0.00235)	(0.00135)	(0.00129)	(0.00264)	35.0%	-4.4%	12.3%
	From 51 kV to 219 kV		(0.03353)	(0.00296)	(0.03649)	(0.02771)	(0.00281)	(0.03052)	-17.4%	-5.1%	-16.4%
	220 kV and above		(0.07276)	(0.00299)	(0.07575)	(0.07748)	(0.00284)	(0.08032)	6.5%	-5.0%	6.0%
California Climate Credit - \$/kWh/Meter/Month			(0.00316)	0.00000	(0.00316)	(0.00316)	0.00000	(0.00316)	0.0%		0.0%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
<b>TOU-GS-1 (Rate D)</b>									
Energy Charge - \$/kWh									
Summer Season									
On-Peak	0.08115	0.09613	0.17728	0.06670	0.09334	0.16004	-17.8%	-2.9%	-9.7%
Mid-peak	0.08115	0.08711	0.16826	0.06670	0.08429	0.15099	-17.8%	-3.2%	-10.3%
Off-Peak	0.04831	0.05660	0.10491	0.04921	0.05699	0.10620	1.9%	0.7%	1.2%
Winter Season									
Mid-peak	0.08115	0.09068	0.17183	0.06670	0.08738	0.15408	-17.8%	-3.6%	-10.3%
Off-Peak	0.04831	0.06479	0.11310	0.04921	0.06169	0.11090	1.9%	-4.8%	-1.9%
Super-Off-Peak	0.04355	0.04878	0.09233	0.04132	0.04615	0.08747	-5.1%	-5.4%	-5.3%
Customer Charge - \$/day	0.555	0.000	0.555	0.468	0.000	0.468	-15.7%		-15.7%
Facilities Related Demand Charge - \$/kW	13.25	0.00	13.25	15.24	0.00	15.24	15.0%		15.0%
Time Related Demand Charge - \$/kW									
Summer Season									
On-Peak	4.41	14.90	19.31	3.51	12.39	15.90	-20.4%	-16.8%	-17.7%
Mid-peak	0.00	0.00	0.00	0.00	0.00	0.00			
Winter Season									
Mid-peak	0.00	3.46	3.46	0.00	3.84	3.84		11.0%	11.0%
Three-Phase Service - \$/day	0.031	0.000	0.031	0.043	0.000	0.043	38.7%		38.7%
Voltage Discount, Energy - \$/kWh									
From 2 kV to 50 kV	(0.00027)	(0.00087)	(0.00114)	0.00000	(0.00053)	(0.00053)	-100.0%	-39.1%	-53.5%
From 51 kV to 219 kV	(0.00354)	(0.00161)	(0.00515)	0.00000	(0.00104)	(0.00104)	-100.0%	-35.4%	-79.8%
220 kV and above	(0.01963)	(0.00164)	(0.02127)	(0.01646)	(0.00103)	(0.01749)	-16.1%	-37.2%	-17.8%
Voltage Discount, Facilities Related Demand - \$/kW									
From 2 kV to 50 kV	(0.14)	0.00	(0.14)	(0.28)	0.00	(0.28)	100.0%		100.0%
From 51 kV to 219 kV	(5.94)	0.00	(5.94)	(5.97)	0.00	(5.97)	0.5%		0.5%
220 kV and above	(10.30)	0.00	(10.30)	(12.29)	0.00	(12.29)	19.3%		19.3%
Voltage Discount, Time-Related Demand - \$/kW									
From 2 kV to 50 kV	(0.04)	(0.12)	(0.16)	(0.04)	(0.19)	(0.23)	0.0%	58.3%	43.8%
From 51 kV to 219 kV	(1.10)	(0.32)	(1.42)	(0.71)	(0.44)	(1.15)	-35.5%	37.5%	-19.0%
220 kV and above	(2.64)	(0.32)	(2.96)	(1.71)	(0.45)	(2.16)	-35.2%	40.6%	-27.0%
California Climate Credit - \$/kWh/Meter/Month	(0.00316)	0.00000	(0.00316)	(0.00316)	0.00000	(0.00316)	0.0%		0.0%
<b>TOU-GS-1 (Rate LG)</b>									
Energy Charge - \$/kWh									
Summer Season									
On-Peak	0.15246	0.31989	0.47235	0.14368	0.34912	0.49280	-5.8%	9.1%	4.3%
Mid-peak	0.15246	0.12767	0.28013	0.14368	0.09014	0.23382	-5.8%	-29.4%	-16.5%
Off-Peak	0.06546	0.08094	0.14640	0.07998	0.06394	0.14392	22.2%	-21.0%	-1.7%
Winter Season									
Mid-peak	0.15246	0.14772	0.30018	0.14368	0.13953	0.28321	-5.8%	-5.5%	-5.7%
Off-Peak	0.06546	0.07096	0.13642	0.07998	0.07659	0.15657	22.2%	7.9%	14.8%
Super-Off-Peak	0.05285	0.04548	0.09833	0.05124	0.04020	0.09144	-3.0%	-11.6%	-7.0%
Customer Charge - \$/day	0.555	0.000	0.555	0.468	0.000	0.468	-15.7%		-15.7%
Facilities Related Demand Charge - \$/kW	8.75	0.00	8.75	8.65	0.00	8.65	-1.1%		-1.1%
Time Related Demand Charge - \$/kW									
Summer Season									
On-Peak	0.00	0.00		0.00	0.00	0.00			
Mid-peak	0.00	0.00		0.00	0.00	0.00			
Three-Phase Service - \$/day	0.031	0.000	0.031	0.043	0.000	0.043	38.7%		38.7%
Voltage Discount, Energy - \$/kWh									
From 2 kV to 50 kV	-0.00062	(0.00135)	(0.00197)	-0.00077	(0.00129)	(0.00206)	24.2%	-4.4%	4.6%
From 51 kV to 219 kV	-0.01757	(0.00296)	(0.02053)	-0.01628	(0.00281)	(0.01909)	-7.3%	-5.1%	-7.0%
220 kV and above	-0.04508	(0.00299)	(0.04807)	-0.05033	(0.00284)	(0.05317)	11.6%	-5.0%	10.6%
Voltage Discount, Facilities Related Demand - \$/kW									
From 2 kV to 50 kV	(0.08)	0.00	(0.08)	(0.13)	0.00	(0.13)	62.5%		62.5%
From 51 kV to 219 kV	(3.34)	0.00	(3.34)	(2.77)	0.00	(2.77)	-17.1%		-17.1%
220 kV and above	(5.80)	0.00	(5.80)	(5.70)	0.00	(5.70)	-1.7%		-1.7%
Voltage Discount, Time Related Demand - \$/kW									
From 2 kV to 50 kV	0.00	0.00		0.00	0.00	0.00			
From 51 kV to 219 kV	0.00	0.00		0.00	0.00	0.00			
220 kV and above	0.00	0.00		0.00	0.00	0.00			
California Climate Credit - \$/kWh/Meter/Month	(0.00316)	0.00000	(0.00316)	(0.00316)	0.00000	(0.00316)	0.0%		0.0%



	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
<b>TOU-GS-1-CPP</b>									
Energy Charge - \$/kWh									
Summer Season									
On-Peak	0.17133	0.31989	0.49122	0.16269	0.34912	0.51181	-5.0%	9.1%	4.2%
Mid-peak	0.17133	0.12767	0.29900	0.16269	0.09014	0.25283	-5.0%	-29.4%	-15.4%
Off-Peak	0.11334	0.08094	0.19428	0.12473	0.06394	0.18867	10.0%	-21.0%	-2.9%
Winter Season									
Mid-peak	0.17133	0.14772	0.31905	0.16269	0.13953	0.30222	-5.0%	-5.5%	-5.3%
Off-Peak	0.11334	0.07096	0.18430	0.12473	0.07659	0.20132	10.0%	7.9%	9.2%
Supr-Off-Peak	0.10465	0.04548	0.15013	0.10705	0.04020	0.14725	2.3%	-11.6%	-1.9%
Customer Charge - \$/day	0.555	0.000	0.555	0.468	0.000	0.468	-15.7%		-15.7%
Three-Phase Service - \$/day	0.031	0.000	0.031	0.043	0.000	0.043	38.7%		38.7%
Voltage Discount, Energy - \$/kWh									
From 2 kV to 50 kV	(0.00100)	(0.00135)	(0.00235)	(0.00135)	(0.00129)	(0.00264)	35.0%	-4.4%	12.3%
From 51 kV to 219 kV	(0.03353)	(0.00296)	(0.03649)	(0.02771)	(0.00281)	(0.03052)	-17.4%	-5.1%	-16.4%
220 kV and above	(0.07276)	(0.00299)	(0.07575)	(0.07748)	(0.00284)	(0.08032)	6.5%	-5.0%	6.0%
CPP Event Energy Charge - \$/kWh	0.00000	0.80000	0.80000	0.00000	0.80000	0.80000		0.0%	0.0%
Summer On-Peak CPP Non-Event Credit - \$/kWh	0.00000	(0.13643)	(0.13643)	0.00000	(0.13643)	(0.13643)		0.0%	0.0%
California Climate Credit - \$/kWh/Meter/Month	(0.00316)	0.00000	(0.00316)	(0.00316)	0.00000	(0.00316)	0.0%		0.0%
<b>TOU-GS-1-D-RTP</b>									
Energy Charge - \$/kWh									
Summer Season									
On-Peak	0.08115	Variable*	Variable*	0.06670	Variable*	Variable*	-17.8%		
Mid-peak	0.08115	Variable*		0.06670	Variable*	Variable*	-17.8%		
Off-Peak	0.04831	Variable*		0.04921	Variable*	Variable*	1.9%		
Winter Season									
Mid-peak	0.08115	Variable*		0.06670	Variable*	Variable*	-17.8%		
Off-Peak	0.04831	Variable*		0.04921	Variable*	Variable*	1.9%		
Supr-Off-Peak	0.04355	Variable*		0.04132	Variable*	Variable*	-5.1%		
Customer Charge - \$/day	0.555		0.555	0.468		0.468	-15.7%		-15.7%
Facilities Related Demand Charge - \$/kW	13.25		13.25	15.24		15.24	15.0%		15.0%
Time Related Demand Charge - \$/kW									
Summer Season									
On-Peak	4.41	0.00	4.41	3.51	0.00	3.51	-20.4%		-20.4%
Mid-peak	0.00	0.00	0.00	0.00	0.00	0.00			
Three-Phase Service - \$/day	0.031		0.031	0.043		0.043	38.7%		38.7%
Voltage Discount, Energy - \$/kWh									
From 2 kV to 50 kV	(0.00027)	(0.00135)	(0.00162)	0.00000	(0.00129)	(0.00129)	-100.0%	-4.4%	-20.4%
Above 50 kV but below 220 kV	(0.00354)	(0.00296)	(0.00650)	0.00000	(0.00281)	(0.00281)	-100.0%	-5.1%	-56.8%
At 220 kV	(0.01963)	(0.00299)	(0.02262)	(0.01646)	(0.00284)	(0.01930)	-16.1%	-5.0%	-14.7%
Voltage Discount, Facilities Related Demand - \$/kW									
From 2 kV to 50 kV	(0.14)		(0.14)	(0.28)		(0.28)	100.0%		100.0%
From 51 kV to 219 kV	(5.94)		(5.94)	(5.97)		(5.97)	0.5%		0.5%
220 kV and above	(10.30)		(10.30)	(12.29)		(12.29)	19.3%		19.3%
Voltage Discount, Time Related Demand - \$/kW									
From 2 kV to 50 kV	(0.04)	0.00	(0.04)	(0.04)	0.00	(0.04)	0.0%		0.0%
From 51 kV to 219 kV	(1.10)	0.00	(1.10)	(0.71)	0.00	(0.71)	-35.5%		-35.5%
220 kV and above	(2.64)	0.00	(2.64)	(1.71)	0.00	(1.71)	-35.2%		-35.2%
California Climate Credit - \$/kWh/Meter/Month	(0.00316)	0.00000	(0.00316)	(0.00316)	0.00000	(0.00316)	0.0%		0.0%

			October 2021 Rates			Proposed 2021 GRC Rates					
			Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
<b>TOU-EV-7 (Rate E)</b>											
Energy Charge - \$/kWh											
Summer Season On-Peak			0.26850	0.23992	0.50842	0.22277	0.26184	0.48461	-17.0%	9.1%	-4.7%
	Mid-Peak		0.26850	0.12767	0.39617	0.22277	0.09014	0.31291	-17.0%	-29.4%	-21.0%
	Off-Peak		0.08975	0.09024	0.17999	0.12497	0.07387	0.19884	39.2%	-18.1%	10.5%
Winter Season On-Peak			0.26850	0.14772	0.41622	0.22277	0.13953	0.36230	-17.0%	-5.5%	-13.0%
	Mid-Peak		0.08975	0.08219	0.17194	0.12497	0.08809	0.21306	39.2%	7.2%	23.9%
	Off-Peak		0.06027	0.04548	0.10575	0.07923	0.04020	0.11943	31.5%	-11.6%	12.9%
Customer Charge - \$/day			0.555		0.555	0.241		0.241	-56.6%		-56.6%
Three-Phase Service - \$/day			0.031		0.031	0.043		0.043	38.7%		38.7%
Voltage Discount, Energy - \$/kWh											
	From 2 kV to 50 kV		(0.00100)	(0.00135)	(0.00235)	(0.00135)	(0.00129)	(0.00264)	35.0%	-4.4%	12.3%
	51 kV to 219 kV		(0.03353)	(0.00296)	(0.03649)	(0.02771)	(0.00281)	(0.03052)	-17.4%	-5.1%	-16.4%
	220 kV and above		(0.07276)	(0.00299)	(0.07575)	(0.07748)	(0.00284)	(0.08032)	6.5%	-5.0%	6.0%
California Climate Credit - \$/kWh/Meter/Month			(0.00316)		(0.00316)	(0.00316)		(0.00316)	0.0%		0.0%
<b>TOU-EV-7 (Rate D)</b>											
Energy Charge - \$/kWh											
Summer Season On-Peak			0.26850	0.23992	0.50842	0.22277	0.26184	0.48461	-17.0%	9.1%	-4.7%
	Mid-Peak		0.26850	0.12767	0.39617	0.22277	0.09014	0.31291	-17.0%	-29.4%	-21.0%
	Off-Peak		0.08975	0.09024	0.17999	0.12497	0.07387	0.19884	39.2%	-18.1%	10.5%
Winter Season On-Peak			0.26850	0.14772	0.41622	0.22277	0.13953	0.36230	-17.0%	-5.5%	-13.0%
	Mid-Peak		0.08975	0.08219	0.17194	0.12497	0.08809	0.21306	39.2%	7.2%	23.9%
	Off-Peak		0.06027	0.04548	0.10575	0.07923	0.04020	0.11943	31.5%	-11.6%	12.9%
Customer Charge - \$/day			0.555		0.555	0.241		0.241	-56.6%		-56.6%
Three-Phase Service - \$/day			0.031		0.031	0.043		0.043	38.7%		38.7%
Facilities Related Demand Charge - \$/kW			0.00		0.000	0.00		0.00			
Voltage Discount, Energy - \$/kWh											
	From 2 kV to 50 kV		(0.00100)	(0.00135)	(0.00235)	(0.00135)	(0.00129)	(0.00264)	35.0%	-4.4%	12.3%
	51 kV to 219 kV		(0.03353)	(0.00296)	(0.03649)	(0.02771)	(0.00281)	(0.03052)	-17.4%	-5.1%	-16.4%
	220 kV and above		(0.07276)	(0.00299)	(0.07575)	(0.07748)	(0.00284)	(0.08032)	6.5%	-5.0%	6.0%
Voltage Discount, Facilities Related Demand - \$/kW											
	From 2 kV to 50 kV		0.00			0.00		0.00			
	51 kV to 219 kV		0.00			0.00		0.00			
	220 kV and above		0.00			0.00		0.00			
California Climate Credit - \$/kWh/Meter/Month			(0.00316)		(0.00316)	(0.00316)		(0.00316)	0.0%		0.0%
<b>TOU-GS-1 (Rate A) - GF</b>											
Energy Charge - \$/kWh											
Summer Season	On-Peak		0.28241	0.13452	0.41693	0.30727	0.12304	0.43031	8.8%	-8.5%	3.2%
	Mid-peak		0.16338	0.12610	0.28948	0.20793	0.11508	0.32301	27.3%	-8.7%	11.6%
	Off-Peak		0.10355	0.12107	0.22462	0.12309	0.11074	0.23383	18.9%	-8.5%	4.1%
Winter Season	Mid-peak		0.11253	0.08390	0.19643	0.10148	0.08167	0.18315	-9.8%	-2.7%	-6.8%
	Off-Peak		0.08834	0.07551	0.16385	0.08405	0.07350	0.15755	-4.9%	-2.7%	-3.8%
Customer Charge - \$/day			0.555	0.000	0.555	0.468	0.000	0.468	-15.7%		-15.7%
Three-Phase Service - \$/day			0.031	0.000	0.031	0.043	0.000	0.043	38.7%		38.7%
Voltage Discount, Energy - \$/kWh											
	From 2 kV to 50 kV		(0.00100)	(0.00135)	(0.00235)	(0.00135)	(0.00129)	(0.00264)	35.0%	-4.4%	12.3%
	From 51 kV to 219 kV		(0.03353)	(0.00296)	(0.03649)	(0.02771)	(0.00281)	(0.03052)	-17.4%	-5.1%	-16.4%
	220 kV and above		(0.07276)	(0.00299)	(0.07575)	(0.07748)	(0.00284)	(0.08032)	6.5%	-5.0%	6.0%
California Climate Credit - \$/kWh/Meter/Month			(0.00316)	0.00000	(0.00316)	(0.00316)	0.00000	(0.00316)	0.0%		0.0%

			October 2021 Rates			Proposed 2021 GRC Rates					
			Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
<b>TOU-GS-1 (Rate B) - GF</b>											
Energy Charge - \$/kWh											
Summer Season											
On-Peak			0.03791	0.06974	0.10765	0.03757	0.06955	0.10712	-0.9%	-0.3%	-0.5%
Mid-peak			0.03791	0.06538	0.10329	0.03757	0.06505	0.10262	-0.9%	-0.5%	-0.6%
Off-Peak			0.03791	0.06277	0.10068	0.03757	0.06260	0.10017	-0.9%	-0.3%	-0.5%
Winter Season											
Mid-peak			0.03791	0.08390	0.12181	0.03757	0.08167	0.11924	-0.9%	-2.7%	-2.1%
Off-Peak			0.03791	0.07551	0.11342	0.03757	0.07350	0.11107	-0.9%	-2.7%	-2.1%
Customer Charge - \$/day			0.555	0.000	0.56	0.468	0.000	0.468	-15.7%		-15.7%
Facilities Related Demand Charge - \$/kW			18.20	0.00	18.20	19.23	0.00	19.23	5.7%		5.7%
Time Related Demand Charge - \$/kW											
Summer Season											
On-Peak			0.00	11.08	11.08	0.00	9.09	9.09		-18.0%	-18.0%
Mid-peak			0.00	3.52	3.52	0.00	2.96	2.96		-15.9%	-15.9%
Three-Phase Service - \$/day			0.031	0.000	0.031	0.043	0.000	0.043	38.7%		38.7%
Voltage Discount, Energy - \$/kWh											
From 2 kV to 50 kV			0.00000	(0.00087)	(0.00087)	0.00000	(0.00053)	(0.00053)		-39.1%	-39.1%
From 51 kV to 219 kV			0.00000	(0.00161)	(0.00161)	0.00000	(0.00104)	(0.00104)		-35.4%	-35.4%
220 kV and above			0.00000	(0.00164)	(0.00164)	0.00000	(0.00103)	(0.00103)		-37.2%	-37.2%
Voltage Discount, Facilities Related Demand - \$/kW											
From 2 kV to 50 kV			(0.21)		(0.21)	(0.28)		(0.28)	33.3%		33.3%
From 51 kV to 219 kV			(7.02)		(7.02)	(5.82)		(5.82)	-17.1%		-17.1%
220 kV and above			(15.25)		(15.25)	(16.28)		(16.28)	6.8%		6.8%
Voltage Discount, Time-Related Demand - \$/kW											
From 2 kV to 50 kV			0.00	(0.15)	(0.15)	0.00	(0.25)	(0.25)		66.7%	66.7%
From 51 kV to 219 kV			0.00	(0.43)	(0.43)	0.00	(0.58)	(0.58)		34.9%	34.9%
220 kV and above			0.00	(0.43)	(0.43)	0.00	(0.59)	(0.59)		37.2%	37.2%
California Climate Credit - \$/kWh/Meter/Month			(0.00316)	0.00000	(0.00316)	(0.00316)	0.00000	(0.00316)	0.0%		0.0%
<b>TOU-GS-1 (Rate C) - GF</b>											
Energy Charge - \$/kWh											
Summer Season											
On-Peak			0.24046	0.13452	0.37498	0.26585	0.12304	0.38889	10.6%	-8.5%	3.7%
Mid-peak			0.12142	0.12610	0.24752	0.16651	0.11508	0.28159	37.1%	-8.7%	13.8%
Off-Peak			0.06159	0.12107	0.18266	0.08167	0.11074	0.19241	32.6%	-8.5%	5.3%
Winter Season											
Mid-peak			0.07057	0.08390	0.15447	0.06006	0.08167	0.14173	-14.9%	-2.7%	-8.2%
Off-Peak			0.04638	0.07551	0.12189	0.04263	0.07350	0.11613	-8.1%	-2.7%	-4.7%
Customer Charge - \$/day			0.555	0.000	0.555	0.468	0.000	0.468	-15.7%		-15.7%
Facilities Related Demand Charge - \$/kW			8.75	0.00	8.750	8.65	0.00	8.65			
Three-Phase Service - \$/day			0.031	0.000	0.031	0.043	0.000	0.043	38.7%		38.7%
Voltage Discount, Energy - \$/kWh											
From 2 kV to 50 kV			(0.00061)	(0.00135)	(0.00196)	(0.00074)	(0.00129)	(0.00203)	21.3%	-4.4%	3.6%
From 51 kV to 219 kV			(0.01967)	(0.00296)	(0.02263)	(0.01517)	(0.00281)	(0.01798)	-22.9%	-5.1%	-20.5%
220 kV and above			(0.04508)	(0.00299)	(0.04807)	(0.05033)	(0.00284)	(0.05317)	11.6%	-5.0%	10.6%
Voltage Discount, Facilities Related Demand - \$/kW											
From 2 kV to 50 kV			(0.08)		(0.08)	(0.13)		(0.13)	62.5%		62.5%
From 51 kV to 219 kV			(2.90)		(2.90)	(2.63)		(2.63)	-9.3%		-9.3%
220 kV and above			(5.80)		(5.80)	(5.70)		(5.70)	-1.7%		-1.7%
California Climate Credit - \$/kWh/Meter/Month			(0.00316)	0.00000	(0.00316)	(0.00316)	0.00000	(0.00316)	0.0%		0.0%

	October 2021 Rates			Proposed 2021 GRC Rates					
	Delivery	Generation	Total Rate	Delivery	Generation	Total Rate	Delivery Change	Generation Change	Total Rate Change
<b>GS-APS-E (Schedules: GS-1 and TOU-GS-1)</b>									
Air Conditioning Cycling Credit - \$/ton/summer season day									
30% Cycling	(0.019)	0.000	(0.019)	(0.019)	0.000	(0.019)	0.0%		0.0%
40% Cycling	0.000	0.000	0.000	0.000	0.000	0.000			
50% Cycling	(0.095)	0.000	(0.095)	(0.095)	0.000	(0.095)	0.0%		0.0%
100% Cycling	(0.270)	0.000	(0.270)	(0.270)	0.000	(0.270)	0.0%		0.0%
<b>Schedule-S-D (Less than 500 kW)</b>									
Energy Charge - \$/kWh/Meter/Month - see (OAT)									
Customer Charge - \$/Meter/Month - see (OAT)									
Standby (CRC) - \$kW									
TOU-GS-1 (Rate D)	13.25	0.00	13.25	15.24	0.00	15.24	15.0%		15.0%
Voltage Discount, Capacity Reservation Demand - \$/kW									
From 2 kV to 50 kV	(0.15)	0.00	(0.15)	(0.28)	0.00	(0.28)	86.7%		86.7%
51 kV to 219 kV	(5.92)	0.00	(5.92)	(5.97)	0.00	(5.97)	0.8%		0.8%
220 kV and Above	(10.30)	0.00	(10.30)	(12.29)	0.00	(12.29)	19.3%		19.3%
TOU-GS-1 (Rate LG)	8.75	0.00	8.75	8.65	0.00	8.65	-1.1%		-1.1%
Voltage Discount, Capacity Reservation Demand - \$/kW									
From 2 kV to 50 kV	(0.10)	0.00	(0.10)	(0.13)	0.00	(0.13)	30.0%		30.0%
51 kV to 219 kV	(3.33)	0.00	(3.33)	(2.77)	0.00	(2.77)	-16.8%		-16.8%
220 kV and Above	(5.80)	0.00	(5.80)	(5.70)	0.00	(5.70)	-1.7%		-1.7%
GS-1	13.25	0.00	13.25	15.24	0.00	15.24	15.0%		15.0%
Voltage Discount, Capacity Reservation Demand - \$/kW									
From 2 kV to 50 kV	(0.15)	0.00	(0.15)	(0.28)	0.00	(0.28)	86.7%		86.7%
51 kV to 219 kV	(5.92)	0.00	(5.92)	(5.97)	0.00	(5.97)	0.8%		0.8%
220 kV and Above	(10.30)	0.00	(10.30)	(12.29)	0.00	(12.29)	19.3%		19.3%
Facilities Related Demand Charge - see OAT									
Demand Charge - \$kW applicable to metered maximum kW demand in excess Standby									
Generation Time-related demand charge - see OAT									
Power Factor Adjustment Charge - see OAT									
<b>Schedule-S (Less than 500 kW) - GF</b>									
Energy Charge - \$/kWh/Meter/Month - see (OAT)									
Customer Charge - \$/Meter/Month - see (OAT)									
Standby (CRC) - \$kW									
TOU-GS-1 (Rate B)	18.21	0.00	18.21	19.23	0.00	19.23	5.6%		5.6%
Voltage Discount, Capacity Reservation Demand - \$/kW									
From 2 kV to 50 kV	(0.21)	0.00	(0.21)	(0.28)	0.00	(0.28)	33.3%		33.3%
51 kV to 219 kV	(7.01)	0.00	(7.01)	(5.82)	0.00	(5.82)	-17.0%		-17.0%
220 kV and Above	(15.26)	0.00	(15.26)	(16.28)	0.00	(16.28)	6.7%		6.7%
TOU-GS-1 (Rate C)	8.75	0.00	8.75	8.65	0.00	8.65	-1.1%		-1.1%
Voltage Discount, Capacity Reservation Demand - \$/kW									
From 2 kV to 50 kV	(0.10)	0.00	(0.10)	(0.13)	0.00	(0.13)	30.0%		30.0%
51 kV to 219 kV	(3.33)	0.00	(3.33)	(2.77)	0.00	(2.77)	-16.8%		-16.8%
220 kV and Above	(5.80)	0.00	(5.80)	(5.70)	0.00	(5.70)	-1.7%		-1.7%
Facilities Related Demand Charge - see OAT									
Demand Charge - \$kW applicable to metered maximum kW demand in excess Standby									
Generation Time-related demand charge - see OAT									
Power Factor Adjustment Charge - see OAT									
<b>Optional CPP rider &lt; 200 kW</b>									
CPP Event Energy Charge - \$/kWh									
TOU-GS-1	0.00000	0.80000	0.80000	0.00000	0.80000	0.80000	0.0%		0.0%
Summer Non-Event Energy Credit - \$/kWh									
TOU-GS-1 (Summer On-Peak Energy Credit)	0.00000	(0.13643)	(0.13643)	0.00000	(0.13643)	(0.13643)	0.0%		0.0%