

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

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05/12/23 01:16 PM **A2305010**

Application Of Southern California Edison Company (U 338-E) For Authority To Increase Its Authorized Revenues For Electric Service In 2025, Among Other Things, And To Reflect That Increase In Rates.

A.23-05-XXX

TEST YEAR 2025 GENERAL RATE CASE APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)

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Dated: May 12, 2023

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I.

INTRODUCTION

Every day, Southern California Edison Company (SCE) powers the lives of more than 15 million Californians by safely delivering reliable, affordable, and increasingly clean electricity, helping to keep homes comfortable, businesses running, and communities thriving. For 137 years, SCE has had that privilege. During the years covered by this General Rate Case (GRC) Application for Test Year 2025, SCE will focus on advancing its commitment to its customers to safely provide electric service that is reliable, resilient, and ready for customers' needs today and the clean energy transition directed by California policy for tomorrow. Through this Application, SCE respectfully requests authority to update its revenue requirement and base rates for Test Year 2025 and to implement a post-test year ratemaking attrition mechanism for 2026, 2027, and 2028, so that SCE can recover the reasonable costs of its operations, facilities, infrastructure, and other functions necessary to provide utility services to its customers.

A. <u>Summary Of Reasons For SCE's Request</u>

As discussed in SCE President and Chief Executive Officer Steven Powell's testimony in SCE-01, Volume 01, during this GRC cycle, SCE will focus on safely providing electric service to its customers that is reliable, resilient, and ready for their needs today and the clean energy transition directed by California policy for tomorrow. SCE will enhance reliability to meet customers' growing demand for, and reliance upon, electricity to not only light their homes and businesses, but power their cars, help them work or study remotely, and stay connected. SCE will improve the grid's resiliency against wildfires, other extreme climate events, and physical and cyber security threats. And SCE will make the grid ready to support distributed energy resources, electric vehicles, and load growth to foster widespread electrification and decarbonization in concert with California's goals, ameliorating the future effects of climate change. Enhanced operational and service excellence is essential to achieving these critical objectives, and affordability and equity remain a central focus for SCE.

1. <u>Reliability</u>

As detailed in Mr. Powell's testimony and in Senior Vice President of Asset Strategy & Planning Erik Takayesu's Grid Policy testimony in SCE-02, Volume 01, Part 1, diligently pursuing foundational infrastructure work and programs underpins a reliable electric system. SCE's proposals will improve the reliability of the grid so that it can meet customers' needs today and in the future. An important part of this mission is the "nuts and bolts" infrastructure work and programs that sustain a reliable electric system, such as regularly inspecting grid components and replacing such components when warranted. SCE's Infrastructure Replacement (IR) testimony (SCE-02, Volume 01, Part 2) addresses the suite of programs through which it prudently and proactively replaces and upgrades its assets as they age and degrade. In the 2021 GRC cycle, SCE had to temporarily reduce the scope of its IR programs in order to focus its resources on emergent, higher risk wildfire mitigation work. But SCE's infrastructure continues to age. This issue is particularly acute for grid components sited outside of high fire risk areas (HFRA), given the reallocation of resources in recent years from IR efforts to wildfire mitigation within HFRA.

In this rate case cycle, SCE must resume at a concerted level, and execute, the IR work necessary to support system reliability and ensure public and worker safety.

2. <u>Resiliency</u>

As set forth in Mr. Powell's and Mr. Takayesu's respective testimony volumes, prudently developing and deploying needed programs to protect public safety and the integrity of the grid is at the heart of grid resiliency. Over the last five years, SCE has necessarily focused on wildfire mitigation efforts. SCE is proud of the progress it has made in its crucial grid hardening work to mitigate the risk of wildfire ignitions. However, while SCE has meaningfully reduced the ignition risk associated with electrical equipment in its service area, it must address the remaining wildfire risk on the system and further reduce the need for Public Safety Power Shutoffs (PSPS) with further grid hardening and other mitigations. These efforts are discussed in more detail in SCE-04, Volume 05, Wildfire Management.

SCE must also prepare for a future where climate change, including rising sea levels and increasing variability of storm events, negatively impacts grid assets themselves. That is why, as detailed in SCE-01, Volume 02 (Risk Policy, Climate Change Policy, and Environmental & Social Justice Goals), where applicable and prudent, SCE has translated the Climate Adaptation and Vulnerability Assessment (CAVA) framework options into measured and targeted long-term investments that will inform the hardening and protection of its system and equipment against the effects of climate change.

Additionally, SCE must augment its physical and cyber security efforts to address the exponential growth in the number and sophistication of attacks on critical grid infrastructure. These efforts are further detailed in SCE-04, Volumes 03 (Cybersecurity) and 04 (Physical Security).

3. <u>Readiness</u>

Governor Newsom emphasized less than a year ago: "Later is too late to act – lifestyles, places, and traditions are being destroyed – and California is leading the world in its efforts to combat climate

change."¹ Accordingly, SCE in this rate case has proposed investments that will ready the grid to support the widespread electrification and decarbonization needed to meet California's ambitious greenhouse gas (GHG) reduction goals. These GHG-reduction goals are not just "stretch targets" – they are deeply embedded in the fabric of California's most important legislative and policy frameworks. To help ensure that SCE fulfills its role to help the State meet these requirements, there is simply no time left to waste. Mindful of the longer-term costs of inaction when confronting the global climate crisis, SCE's GRC request reflects that urgent need for the State to expeditiously electrify vast swaths of the economy.

As described in Mr. Takayesu's testimony and in more detail in SCE-02, Volume 07 (Load Growth, Transmission Projects, and Engineering), SCE is facing the fastest electricity demand growth in decades. With long lead times for construction of critical facilities like new substations, SCE must invest in California's electrified future *now* rather than trying to implement a "just in time solution" to meet the new customer demand later. Simply put, customers will be more likely to embrace electrification solutions necessary to meet the State's GHG reduction objectives when they have confidence that the grid can meet their demand reliably.

4. **Operational and Service Excellence**

SCE must continue to streamline its operations for efficiency and improve its data quality for better asset management. SCE must also continue to modernize its information technology infrastructure and otherwise automate its internal systems to improve its customers' experience when they interface with SCE. These efforts are detailed in SCE-06, Volume 01, Enterprise Technology. Customers are understandably expecting dependable and user-friendly electric service as they expand their reliance on electricity. To that end, critical investments in this GRC cycle, many of which are discussed in SCE-03, Volume 03 (Customer Programs and Service), include expanding self-service transaction capabilities to

Governor Newsom's formal remarks at September 2022 Climate Week NYC, available at <u>https://www.gov.ca.gov/2022/09/21/recap-at-climate-week-nyc-governor-newsom-highlights-californiasclimate-leadership-on-the-world-stage/.</u>

further simplify and streamline the customer experience, honing communications so that customers are provided with information that matters to them in a timely manner, and leveraging advanced predictive analytics capabilities to enable more effective communications.

5. <u>Affordability and Equity</u>

SCE recognizes that the necessary investments it has proposed to make the grid reliable, resilient, and ready carry costs that are borne by customers. SCE attentively and continuously looks for ways to save customers' money, avoid cost increases, and gain efficiencies. This includes a move to a pure self-insurance model for wildfire liability risk, the Inspection Redesign Initiative, and SCE's recent Operational Excellence Catalyst, which is an employee-led continuous improvement effort to deploy innovative ideas and drive process improvements across the enterprise. These efforts have helped SCE partially mitigate the cost impact of the significant amount of work that is needed. Additionally, the work that SCE must perform during this rate case cycle to help electrify the economy and support the adoption of clean technologies is vital to facilitate future reductions in overall energy costs for its customers. As electric costs are spread more broadly over increased usage and customers reduce their reliance on expensive fossil fuel alternatives, customers can expect to see a reduced energy share of wallet in the future.

SCE also remains focused on low-income customers who face barriers to widespread adoption of electric vehicles and behind-the-meter technologies such as energy-efficient appliances and energy storage and load management systems. SCE is managing and participating in several programs to improve the equity and inclusivity of electrification for all its customers. It is important to note that the clean energy future is not just about decarbonization – it will also lead to local air quality improvements, benefitting disadvantaged communities who have long borne a disproportionate burden from air pollution.

B. <u>Summary Of SCE's CPUC-Jurisdictional Revenue Requirement Request</u>

In this Application, to meet the objectives described above, SCE requests an authorized base revenue requirement (ABRR) of \$10.27 billion to become effective January 1, 2025, and to reflect the ABRR in distribution, generation, and new system generation rates. Including sales forecast updates and \$95.57 million in one-time memorandum account recoveries, SCE's request represents a \$1.90 billion, or 23 percent, increase in 2025 over 2024 requested base rates.^{2,3} Table 1 summarizes SCE's requested ABRR and CPUC-jurisdictional base-rate revenue changes for Test Year 2025 and the three post-Test Years, 2026, 2027 and 2028.

² The 2024 proposed revenue requirement reflects SCE's 2021 GRC Track 4 request as of February 24, 2023, adjusted for the Commission's Decision on SCE's 2023-2025 Cost of Capital and the April 14, 2023 Proposed Decision Adopting Agreement Regarding Wildfire Liability Insurance. Both of these proceedings are discussed in Section II, Related Proceedings, below.

³ This increase is based on the current escalation rates proposed in Exhibit SCE-07, Volume 01, Results of Operations. Requested rates will be updated in Update Testimony to reflect the current escalation rates and known cost changes at that time, such as ratified collective bargaining agreements.

Table 1Summary of Earnings At Present and Proposed Rates(\$000)

		Authorized		Estimated			CPUC	-GRC	
.ine No	Item	2022	2023	2024	2025	2025	2026	2027	2028
	item	LULL			2020	2020	2020	2021	2020
			At P	resent Rates					
1.	Authorized Base Revenue Requirement	8,671,709	8,983,312	9,804,911	9,820,777	8,371,337	8,371,337	8,371,337	8,371,337
2.	Expenses:								
	Operation & Maintenance	2,801,094	3,139,431	3,225,382	3,482,060	3,270,789	3,352,411	3,419,877	3,490,874
	Depreciation	2,425,708	2,605,386	2,793,642	3,375,079	3,016,327	3,225,301	3,459,943	3,729,72
	Taxes Revenue Credits	880,155 (231,720)	846,113 (236,052)	1,094,620 (237,751)	882,514 (233,943)	620,766 (171,005)	704,798 (174,457)	653,900 (168,310)	588,16 (168,07
	Total Expense	5,875,237	6,354,878	6,875,892	7,505,710	6,736,877	7,108,053	7,365,411	7,640,69
		0 700 474	0.000.405	0.000.040	0.045.007	1 004 400	4 000 004	4 005 000	700.04
8.	NET OPERATING REVENUE	2,796,471	2,628,435	2,929,019	2,315,067	1,634,460	1,263,284	1,005,926	730,64
9.	RATE BASE	37,618,479	42,166,688	45,074,299	47,860,519	40,367,724	43,552,417	46,917,482	50,340,18
10.	RATE OF RETURN	7.43%	6.23%	6.50%	4.84%	4.05%	2.90%	2.14%	1.45
			At Pro	posed Rates					
11.	Authorized Base Revenue Requirement					8,371,337	10,266,672	10,885,338	11,548,97
12.	Proposed Change					1,895,334	618,666	663,634	704,51
13.	Total Proposed Revenue Requirement					10,266,672	10,885,338	11,548,972	12,253,48
	Expenses:								
	Operation & Maintenance					3,270,913 3,024,446	3,332,376 3,233,421	3,399,805 3,464,004	3,470,81
	Depreciation Taxes					1,139,936	1,254,415	1.363.422	3,733,78
18.	Revenue Credits					(171,005)	(174,457)	(168,310)	(168,07
19.	Total Expense				-	7,264,291	7,645,755	8,058,921	8,508,82
20.	NET OPERATING REVENUE					3,002,381	3,239,583	3,490,051	3,744,65
21.	RATE BASE					40,367,724	43,552,417	46,917,482	50,340,18
22.	RATE OF RETURN					7.44%	7.44%	7.44%	7.44
			Reve	nue Change					
	Seismic Retrofit for Non-Electric Facilities Memo		RNEFMA)			3,440	(3,440)		
	Customer Service Re-Platform Memorandum Ac					35,637	(35,637)		
	Service Center Modernization Projects Memorar					24,556	(24,556)		
	Distribution Deferral Administrative Costs Memo		DDACMA)			771	(771)		
	Emergency Customer Protections Memorandum					73	(73)		
	Residential Disconnections Implementation Cos					7,640	(7,640)		
	NEM Online Application System Memorandum A					1,267	(1,267)		
	California Consumer Privacy Act Memorandum					4,893	(4,893)		
	Avoided Cost Calculator Memorandum Account					740 494	(740)		
	Community Choice Aggregators Audit Memoran Wildfire Mitigation Plan Memorandum Account (AMA)			494	(494) (17,143)		
34.	whome mugation Fian Memoranoum Account (wind WA)							
5.						96,653	(96,653)		
36.	GRC Estimated kWh Sales Reductions					86,371	148,890	187,091	189,97
	GRC Revenue Change					1,905,616	373,123	476,544	514,53

The expenses and capital expenditures presented in the prepared testimony accompanying this Application include certain items that are subject to the ratemaking authority of the Federal Energy Regulatory Commission (FERC). To determine 2025-2028 CPUC-jurisdictional revenue requirements, SCE must split those costs that are to be recovered through rates authorized by the Commission from those authorized by FERC. In D.04-07-022 (SCE's 2003 GRC), the Commission adopted SCE's proposed method for doing so. The Commission followed this same method in SCE's prior GRCs since

2006.⁴ In addition, as discussed in detail below, SCE has already excluded from its rate base the ongoing revenue requirement associated with certain recorded wildfire mitigation-related capital expenditures pursuant to Assembly Bill No. 1054.

Section VII contains the full summary of SCE's requests for relief.

C. <u>List Of Testimony Exhibits</u>

This Application is supported by the following Exhibits, which are being served contemporaneously with this Application.

2025 General Rate Case Exhibit List
SCE-01 – Policy
SCE-01 Vol. 01 – Policy
SCE-01 Vol. 02 – Risk Policy, Climate Change Policy, and Environmental & Social Justice Goals
SCE-02 – Grid Activities
SCE-02 Vol. 01 Pt. 1 – Grid Policy
SCE-02 Vol. 01 Pt. 2 – Distribution Infrastructure Replacement
SCE-02 Vol. 02 – Distribution Inspections & Maintenance and Capital-Related
SCE-02 Vol. 03 – Meter Activities
SCE-02 Vol. 04 – Transmission Grid
SCE-02 Vol. 05 – Substation
SCE-02 Vol. 06 – Grid Modernization, Grid Technology, and Energy Storage
SCE-02 Vol. 07 – Load Growth, Transmission Projects, and Engineering
SCE-02 Vol. 08 – New Service Connections and Customer Requested System Modifications
SCE-02 Vol. 09 – Poles
SCE-02 Vol. 10 – Vegetation Management
SCE-02 Vol. 11 – Other Costs & OOR
SCE-03 – Customer Interactions
SCE-03 Vol. 01 – Customer Service Operations

⁴ See D.06-05-016, D.09-03-025, D.12-11-051, D.15-11-021, D.19-05-020, D. 21-08-036.

2025 General Rate Case **Exhibit List** SCE-03 Vol. 02 – Business Customer Services SCE-03 Vol. 03 – Customer Programs and Services SCE-04 – Resiliency SCE-04 Vol. 01 – Business Continuation SCE-04 Vol. 02 – Emergency Management SCE-04 Vol. 03 – Cybersecurity SCE-04 Vol. 04 – Physical Security SCE-04 Vol. 05 Pt. 1 – Wildfire Management Overview SCE-04 Vol. 05 Pt. 2 – Wildfire Management Grid Hardening SCE-04 Vol. 05 Pt. 3 - Wildfire Management Emergent Technology and Inspections and Remediations SCE-04 Vol. 05 Pt. 4 – Wildfire Management PSPS and Other Wildfire Activities SCE-05 – Generation and Energy Procurement SCE-05 Vol. 01 – Generation SCE-05 Vol. 02 – Energy Procurement **SCE-06 – Enterprise Support** SCE-06 Vol. 01 – Enterprise Technology SCE-06 Vol. 02 – Enterprise Technology - OU Capitalized Software SCE-06 Vol. 03 – Enterprise Planning & Governance SCE-06 Vol. 04 – Employee Benefits, Training & Support SCE-06 Vol. 05 – Total Compensation Study SCE-06 Vol. 06 – Environmental Services, Audit, Ethics & Compliance, and Safety Programs SCE-06 Vol. 07 – Enterprise Operations SCE-06 Vol. 08 – Policy, External Engagement and Ratemaking **SCE-07 – Results of Operations** SCE-07 Vol. 01 – Results of Operations⁵ SCE-07 Vol. 02 – Rate Base, Depreciation Expense, and Taxes SCE-07 Vol. 03 – SCE Asset Depreciation Study

 $[\]frac{5}{2}$ This volume includes GRC balancing account and memorandum account proposals, among other items.

2025 General Rate Case
Exhibit List
SCE-07 Vol. 04 – Affordability and Post-Test Year Ratemaking
SCE-07 Vol. 05 – Study of Residential Disconnections and Arrearages
SCE-08 – Compliance Requirements
SCE-09 – Accessibility Issues
SCE-10 – Witness Qualifications

D. <u>Summary Of Application</u>

This Application is structured as follows. Section II describes some recent, current, or future CPUC regulatory proceedings that influence and interact with this GRC. Section III sets forth anticipated updates to SCE's testimony. Section IV describes SCE's proposals to establish, modify, or eliminate various ratemaking balancing and memorandum accounts, and seeks recovery of certain memorandum account balances. Section V addresses other miscellaneous issues including the impact on this proceeding of the Legislature's passage of AB 1054, previously litigated issues on which the Commission has taken a position in previous GRCs, SCE's collaboration with the Center for Accessible Technology (CforAT) on disabled customer accessibility issues, affordability metrics, and environmental social justice issues. Section VI addresses the various statutory and procedural issues required in every GRC. Finally, Section VII contains SCE's requests for relief.

II.

RELATED PROCEEDINGS

SCE submits this GRC at a time when other important and related CPUC regulatory proceedings have recently concluded, are pending, or are soon anticipated. Below, SCE discusses the interaction between this GRC and those other proceedings.

A. <u>Risk Assessment Mitigation Phase</u>

The Commission's Risk Assessment Mitigation Phase (RAMP) represents an integral part of SCE's overall risk management process. SCE's 2022 RAMP focused on safety risk mitigations and return on risk investment for 2025-2028.

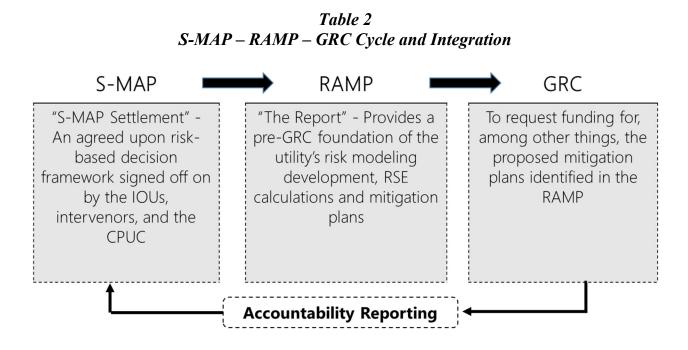
RAMP is a pre-requisite filing of the GRC, allowing the Commission to understand how SCE identifies and mitigates safety risks. SCE filed its current RAMP on May 13, 2022 – one year before this GRC Application filing. SCE's 2022 RAMP filing:⁶

- > Described SCE's top safety risks (including wildfire);
- > Explained how SCE analyzes and prioritizes each risk; and
- > Evaluated mitigation activities for each risk.

Spending is not authorized during the RAMP phase of the GRC, but RAMP informs the scope and spending for major safety-driven initiatives in the GRC.

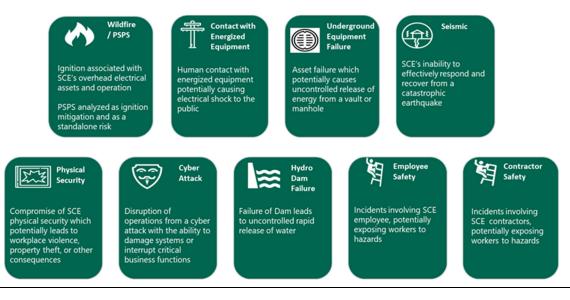
As illustrated in Table 2, this was SCE's first RAMP filed under the requirements of the settlement reached in the Safety Model Assessment Proceeding (S-MAP), A.15-05-002. Because of timing, the Commission exempted SCE's 2018 RAMP Report from the requirements of the S-MAP settlement. SCE's 2022 RAMP complies with the new requirements from the settlement, as well as applicable guidance from the Commission's Risk-Informed Decision-Making Rulemaking (R.20-07-013) (Risk OIR).

<u>6</u> A.22-05-013.



SCE's RAMP Report examined the top safety risks to its customers and the communities it serves, to the Company, and to SCE employees and contractors. After rigorous analysis pursuant to the terms of the S-MAP settlement, SCE identified these top safety risks that warranted inclusion in RAMP, as displayed in Figure 1: Wildfire/PSPS, Contact with Energized Equipment, Underground Equipment Failure, Seismic, Physical Security, Cyber Attack, Hydro Dam Failure, Employee Safety, and Contractor Safety. Collectively, SCE refers to these top safety risks as RAMP Risks.

Figure 1 SCE's 2022 RAMP Risks



The 2022 RAMP Risks are substantially similar to the RAMP Risks that SCE presented in its 2018 RAMP. For reference, the general differences are as follows:

- The 2018 RAMP combined Employee and Contractor Safety in one RAMP chapter and overall risk analysis. The 2022 RAMP Application provided separate risk chapters and analyses for Employee and Contractor Safety.
- The 2018 RAMP only included Seismic as a sub-part of a RAMP Risk titled Building Safety. The 2022 RAMP analyzed Seismic as a standalone RAMP Risk and does not include Building Safety as a standalone RAMP Risk.
- The 2018 RAMP examined PSPS as an ignition mitigation for the Wildfire RAMP Risk. The 2022 RAMP, per Commission direction, assesses PSPS as a standalone risk.

Moreover, the analysis of each RAMP Risk now occurs at a more granular level compared to SCE's 2018 RAMP Report. In SCE's last RAMP, risks could be analyzed at the overall system level. In accordance with the S-MAP settlement provisions on risk tranching, the 2022 RAMP breaks each risk into logical sub-parts and performs a separate risk analysis for each sub-part. For example, rather than analyzing employee safety from the lens of all employees, SCE's 2022 RAMP analyzes field employees

separately from office employees, and then further breaks down field employees into additional separate risk tranches.

Each of the RAMP Risks is explained and assessed in detail in the individual chapters of the RAMP Report. SCE analyzed existing controls and identified new mitigations that can potentially enhance capabilities in addressing the RAMP Risks. For each mitigation plan, SCE also presented two separate alternative mitigation plans that SCE considered. SCE outlined why, out of the three plans, it chose the mitigation plan that it selected. Finally, SCE discussed lessons learned, addressed applicable feedback from other stakeholders, and examined potential improvement opportunities.

SCE also included several topics as substantive appendices to its RAMP Report. The subjects were addressed in appendix form, either because they cut across multiple RAMP Risks or had previously been suggested for inclusion in RAMP via informal feedback from CPUC Staff. The appendices consisted of the following:

- Climate Change Where applicable under RAMP criteria, SCE integrated its Climate Change Vulnerability Assessment report into its RAMP Report;
- Battery Energy Storage Systems (BESS) Discussion of two BESS safety-related risks, as well as SCE's approach to mitigate these risks: (1) thermal propagation risk and (2) decommissioning;
- San Onofre Nuclear Generating Station (SONGS) Discussion on the updated SONGS risk profile since the 2018 RAMP, and summary of the current state of risks, including dry fuel storage and executing the Dismantling and Decommissioning project phase;
- Transmission Asset Failure/Aging Infrastructure Discussion on certain potential, but direct, safety risks associated with transmission lines, sub-transmission lines, and substation assets that are not addressed within SCE's RAMP Risk chapters; and

Widespread Outage – Discussion of widespread outage impacts to the extent not already covered in other RAMP chapters.

Since the filing of reply comments on January 4, 2023 in the SCE RAMP proceeding, to SCE's knowledge there has been no further ongoing activity in the SCE RAMP docket. During the prehearing conference for the RAMP proceeding, the Administrative Law Judge indicated that the RAMP proceeding is generally expected to be closed out around the time of the prehearing conference in SCE's Test Year 2025 GRC, after certain GRC post-application mapping occurs regarding where relevant RAMP issues are addressed in the GRC application.²

B. <u>2023-2025 Wildfire Mitigation Plan</u>

On March 27, 2023, SCE filed its 2023-2025 Wildfire Mitigation Plan (WMP) with the Office of Energy Infrastructure Safety, describing the programs and activities it intends to pursue in 2023 and beyond, related to wildfire risk mitigation.

C. <u>2023 Cost Of Capital Decision (A.22-04-008)</u>

On December 15, 2022, the Commission adopted D.22-12-031 (as subsequently corrected in D.23-01-002), maintaining SCE's currently authorized capital structure at 43% long-term debt, 5% preferred equity, and 52% common equity and authorizing a cost of capital for 2023, 2024 and 2025 that consists of: cost of long-term debt of 4.39%, cost of preferred equity of 6.50%, and return on equity of 10.05%. The Decision includes an adjustment mechanism set by the CPUC that could adjust the authorized cost of capital between SCE's Cost of Capital proceedings but holds that the adjustment mechanism will be evaluated in a second phase of the proceeding. Based on the capital structure and cost factors discussed above, SCE's weighted average return on rate base will be 7.44% for 2023.

¹ See A.22-05-013, Prehearing Conference Transcript (August 15, 2022), p. 12.

D. Petition For Modification Of 2021 GRC Track 1 Decision (D.21-08-036)

On February 22, 2023, SCE, Cal Advocates and The Utility Reform Network (TURN) entered into the *Agreement Between Southern California Edison Company, The Utility Reform Network And The Public Advocates Office At The California Public Utilities Commission To Jointly Petition To Modify D.21-08-036 On Wildfire Liability Insurance Issues,* for 100 percent wildfire liability self-insurance (Agreement). That Agreement seeks modification of the 2021 GRC Decision by May 18, 2023 by way of a Joint Petition for Modification ("Joint Petition") in Application 19-08-013 and commits the parties to jointly advocate for and defend the continuation of the self-insurance framework through the 2025 GRC cycle. If the Joint Petition is approved, the parties to the Agreement stipulate to support and defend the Agreement through the 2025 GRC period and update the revenue requirement annually via a Tier 2 Advice Letter, pursuant to the terms of the Agreement.⁸ If the Joint Petition is not approved, SCE respectfully reserves the right to submit supplemental testimony in this proceeding based on that change in circumstances. On April 14, 2023, a proposed decision was issued adopting the Agreement without modification and this item is scheduled to be heard at the Commission's May 18, 2023 Business Meeting.

E. <u>2021 GRC Track 4 (A.19-08-013)</u>

In SCE's pending Track 4 of its 2021 GRC, SCE requests that the Commission authorize a GRC revenue requirement for 2024. This is necessary to continue SCE's fundamental mission of providing safe, reliable, affordable, and increasingly clean electricity to its 15 million customers. Track 4 was initiated by the Commission's change of the Rate Case Plan (RCP) for the utilities' GRCs from three-year to four-year cycles after SCE had filed its 2021 GRC, which necessitated a novel procedural

⁸ The Agreement is attached as Appendix C to the Petition for Modification in A.19-08-013, Joint Petition For Modification Of Decision 21-08-036 And Expedited Approval And Adoption Of The Attached Agreement Of Southern California Edison Company (U 338-E), The Public Advocates Office, And The Utility Reform Network Regarding Wildfire Liability Insurance (February 22, 2023).

vehicle to establish a revenue requirement for 2024. Before the change to a four-year cycle, 2024 would have been the Test Year of SCE's next GRC.

F. Cost Recovery Proceedings For Wildfire Mitigation And Vegetation Management

On June 3, 2022, SCE filed an Application (A.22-06-003) seeking reasonableness review and authorization to recover in rates the incremental costs recorded in 2021 to its Wildfire Mitigation Plan Memorandum Account (WMPMA), Vegetation Management Balancing Account (VMBA), and Fire Risk Mitigation Memorandum Account (FRMMA).⁹ That proceeding is still pending, with an expected decision in early 2024. SCE expects to file similar Applications for its 2022, 2023 and 2024 costs.

G. <u>NextGen ERP Implementation Cost Recovery Application</u>

SCE's core business data and functions—including its financial operations, human resources, asset and work management, and supply chains—run or flow through SAP. As discussed in greater detail in SCE-06, Volume 02, OU Capitalized Software, as the SAP Business Suite Enterprise Resource Planning (ERP) Platform reaches the end of its life cycle, SCE faces increasing risk that added complexity and customizations, with the emergence of new technological advancements, will not be supported by the current platform. To help mitigate this risk, SCE plans to replace its current SAP with newer SAP technology to broaden its digital capabilities across its business data and function. This program is referred to as NextGen ERP. At the time of the filing of this Application, SCE will have recorded costs or high confidence estimates for three phases of the program through mid-2024: Solution Planning, Solution Analysis Phase 1, and Solution Analysis Phase 2. The program costs for executing the Implementation and Post-Implementation phases of NextGen ERP, however, will not be known with enough certainty until the completion of Solution Analysis Phase 2 in mid-2024. Therefore, SCE is seeking authorization in this proceeding to establish a new memorandum account to record the revenue

⁹ In this Application, SCE is seeking to continue the VMBA, with modifications, during the 2025 GRC cycle. The WMPMA and FRMMA are authorized by statute and will also continue to be in effect during the 2025 GRC cycle.

requirements associated with O&M expenses and capital expenditures for activities related to the Implementation phase of the NextGen ERP project. SCE proposes to address the reasonableness and recovery approach for the amounts recorded in that memorandum account, as well as SCE's forecast and cost recovery for the remaining Implementation and Post-Implementation costs, in a 2024 NextGen ERP standalone application.

H. Advanced Metering Infrastructure 2.0 Deployment Cost Recovery Application

As discussed in Exhibit SCE-02, Volume 03, Meter Activities, by 2028 approximately 80 percent of SCE's existing Advanced Metering Infrastructure (AMI) meters will have been installed in the field for more than 15 years. As SCE's meter fleet has aged, SCE has been experiencing an increase in failures year-over-year. This increasing failure rate impacts SCE's ability to provide its customers reliable, timely, and accurate billing, and results in higher manual billing costs, and increased costs for personnel to troubleshoot and replace failed meters. The AMI 1.0-meter population is also experiencing technology obsolescence. Given the increasing meter failures, the risk of meter obsolescence, and inability to update the associated and necessary software, it is imperative that SCE begins the replacement process for its meter fleet and associated infrastructure to provide customers adequate billing services and avoid additional operational costs. This program is referred to as AMI 2.0.

SCE has included base-level planning costs for AMI 2.0 from 2023 through 2027 in its GRC testimony for activities including capability definition, technology evaluation, and field testing. Building upon much of the foundational work that will be completed in these pre-deployment activities, SCE subsequently intends to submit a separate application to the Commission in 2025 for the costs of the full deployment. This standalone application will include SCE's proposals for review and recovery of the forecast costs for AMI 2.0 deployment.

Because SCE currently estimates incurring O&M expenses in 2023 and 2024 for pre-deployment activities for the new AMI 2.0 project, SCE is seeking authorization in this proceeding to establish a new memorandum account to record the revenue requirements for these O&M expenses. SCE proposes

to seek recovery of the amounts recorded in this memorandum account in the standalone application for full AMI 2.0 deployment.

III.

ANTICIPATED UPDATES TO TESTIMONY

The forecasts underpinning the requests in this GRC were generally developed over an extended period of time and substantially finalized in the February/March 2023 timeframe. SCE believes those forecasts continue to remain reasonable, although in the normal course SCE will serve errata. In addition, SCE's proposed schedule also provides for updates to certain areas of testimony, including updates to costs in memorandum accounts. At this time, SCE anticipates submitting testimony to address the following five items.

<u>First</u>, as is typical in complex forecast GRC filings, SCE has already identified a number of errors in its forecast that will need to be corrected. To the extent possible, SCE has already corrected those errors in the narrative description in the relevant sections of testimony. However, because these errors were discovered late in the GRC preparation process, those corrections have not yet flowed through to the Results of Operation (RO) model that generates the proposed Revenue Requirement. In this Application, SCE has reflected a downward adjustment of \$20 million to its proposed 2025 revenue requirement, which is an estimated impact associated with a portion of the known O&M-related errata. SCE did not perform an estimate or adjustment for known Capital-related errata given capital expenditures are comparatively less impactful to SCE's 2025 Test Year revenue requirement calculation than O&M expenses. SCE will update the RO model in due course to determine the actual impact of its O&M and Capital errata to make all necessary corrections. In addition, it is likely that, over the course of the proceeding, additional necessary corrections will be discovered through the discovery process. Consistent with past practice over many GRCs, SCE anticipates submitting several iterations of corrections. Second, consistent with the Commission's RCP and past practice over many GRCs, SCE intends to submit Update Testimony during an update phase of this proceeding. The Commission's RCP outlines the following criteria for Update Testimony:

- A. Known changes in cost of labor based on contract negotiations completed or known changes that result from updated data using the same indices used in the original presentation during the hearing.
- B. Changes in non-labor escalation factors based on the same indices the party used in its original presentation during hearings.
- C. Known changes due to governmental action such as changes in tax rates, postage rates, or assessed valuation.¹⁰

As shown in Section VI.C below, SCE is proposing to serve this Update Testimony on March 29, 2024.

Third, SCE specifically requests that it be permitted to update its O&M and Capital forecast for costs associated with the Palo Verde Nuclear Generation Station (Palo Verde). SCE's 2025 Test Year O&M non-labor and Capital forecasts provided in this testimony were based on the Palo Verde O&M and Capital budgets published in December 2022. As explained in SCE's Exhibit SCE-05, Volume 01, Generation, late in the GRC testimony development timeline, Palo Verde issued updated O&M and Capital budgets that reflect material cost increases. These updates occurred too late to enable their effective inclusion in this testimony, and the Palo Verde participants will not approve the updated budget until November 2023. This situation similarly occurred in SCE's 2021 GRC Application, in which the Commission agreed to TURN's recommendation to rely on an updated budget and found it reasonable to use the most up-to-date budget information available in that record.¹¹

Accordingly, consistent with the Commission's ruling in the last GRC, SCE proposes to revise its Test Year 2025 Palo Verde forecasts for both O&M non-labor and Capital in this proceeding as the updated Palo Verde budgets become available. SCE proposes to submit Supplemental Testimony

<u>10</u> D.89-01-040.

¹¹ D.21-08-036, pp. 364-65.

reflecting the latest available Palo Verde O&M and Capital budgets by no later than December 22, 2023, which would allow parties to address SCE's Supplemental Testimony in their Concurrent Rebuttal Testimony due on January 30, 2023 under SCE's proposed schedule in Section VI.C of this Application. SCE requests that the Commission adopt the updated Test Year 2025 O&M non-labor and Capital forecasts that SCE will provide, so as to use the most up-to-date budget information available for all such externally-driven Palo Verde costs in this proceeding, consistent with the Commission's approach in SCE's 2021 GRC.

<u>Fourth</u>, SCE requests that it be permitted to update its O&M and Capital forecast for any known additional savings associated with its employee-led continuous improvement efforts referred to as Operational Excellence Catalyst (OEC). SCE has included approximately \$41 million of annual O&M savings and approximately \$64 million of Capital savings across the 2025-2028 forecast period. These savings are associated with employees' ideas that have been evaluated and are expected to drive process improvements and other efficiencies that will help offset operational costs. As explained in Exhibit SCE-06, Volume 03, Enterprise Planning & Governance, at the time of finalizing SCE's GRC filing, some of these ideas are at varying stages of being assessed for feasibility, and/or may lack implementation plans, or external information that are essential for developing a reasonable estimate of operational and cost impacts. SCE will continue to assess these OEC ideas after SCE's GRC filing. To the extent any incremental OEC savings are known or can be forecast with a reasonable degree of certainty at the time, SCE plans to update its forecasts to include such incremental savings in Rebuttal Testimony.

<u>Fifth</u>, as noted in Section II.D above, SCE will supplement its insurance testimony in the event its Petition for Modification on wildfire self-insurance is not timely approved.

SCE'S RATEMAKING PROPOSALS TO ESTABLISH, MODIFY, OR ELIMINATE VARIOUS BALANCING/MEMORANDUM ACCOUNTS AND RECOVER CERTAIN MEMORANDUM <u>ACCOUNT BALANCES</u>

In addition to SCE's requests described above, SCE is also making several other ratemaking requests, which are summarized below and explained in detail in Exhibit SCE-07, Volume 01, Results of Operations. Table 3 lists a summary of SCE's proposals to establish, modify, or eliminate various memorandum and balancing accounts.

Table 3
Proposals for Balancing and Memorandum Accounts

New Accounts
General Liability Insurance Balancing Account
Next Gen ERP SAP Memorandum Account
Advanced Metering Infrastructure 2.0 Memorandum Account
Historic Sporting Events Cost Tracking Memorandum Account
Cybersecurity Compliance Memorandum Account
Renewable Transmission Projects Memorandum Account
Modified Accounts
Wildfire Risk Mitigation Balancing Account/ Grid Hardening Balancing Account
Vegetation Management Balancing Account
Risk Management Balancing Account
Z-Factor Memorandum Account
Medical Programs Balancing Account
Pension Cost Balancing Account
Post-Employment Benefits Other Than Pensions Balancing Account
Service Center Modernization Projects Memorandum Account
Catalina Repower Memorandum Account
Electric Vehicle Infrastructure Memorandum Account
Eliminated Accounts
Underground Structures Replacement Balancing Account
Pole Loading and Deteriorated Pole Programs Balancing Account
Customer Service Re-Platform Memorandum Account
Seismic Retrofit of Non-Electric Facilities Memorandum Account
NEM Online Application System Memorandum Account

A. <u>Establishment Of Balancing/Memorandum Accounts</u>

SCE seeks to establish six new balancing and memorandum accounts. In the normal course, these proposals will be decided in late 2024 or early 2025 in the final decision resolving SCE's Application. However, for three of these accounts—(1) Advanced Metering Infrastructure 2.0 Memorandum Account (AMIMA), (2) Cybersecurity Compliance Memorandum Account (CCMA), and (3) NextGen ERP SAP Memorandum Account (NGESMA)—an earlier decision is needed so that SCE can proceed with necessary work in 2023 and 2024 without precluding cost recovery at a future date due to the rule against retroactive ratemaking. As such, shortly after filing this Application, SCE will be filing a motion requesting that the Assigned Commissioner or Assigned Administrative Law Judges in this proceeding expeditiously issue an order approving these three accounts with SCE's requested effective dates. The following paragraphs briefly describe all six new balancing and memorandum accounts SCE seeks to establish in this proceeding.

General Liability Insurance Balancing Account (GLIBA). SCE seeks to establish a new twoway interest-bearing balancing account, the GLIBA, to record and recover/return on an annual basis the difference between SCE's authorized non-wildfire general liability insurance premiums costs that are included on a forecast basis in customers' distribution rates, and the actual costs incurred by SCE for non-wildfire general liability insurance premiums.

NextGen ERP SAP Memorandum Account (NGESMA). The NGESMA will track the revenue requirements associated with O&M expenses and capital expenditures for activities related to the implementation phase of the NextGen ERP project which, as described above in Section II.G, will replace SCE's current SAP ERP platform with newer SAP technology. SCE proposes to address the reasonableness and recovery of the amounts recorded in the NGESMA in a forthcoming standalone application.

Advanced Metering Infrastructure 2.0 Memorandum Account (AMIMA). The AMIMA will record the revenue requirements for the O&M expenses associated with the pre-deployment planning costs for the new AMI 2.0 project to replace SCE's smart meter fleet and associated infrastructure due to

increasing meter failures and the risk of meter obsolescence. SCE proposes to seek recovery of the amounts recorded in the AMIMA in a standalone application as discussed in Section II.H above.

Historic Sporting Events Cost Tracking Memorandum Account (HSECTMA). The HSECTMA will track incremental expenses associated with SCE's costs and services during the 2026 World Cup, as well as the 2028 Summer Olympics, which would not be incurred "but for" the electrical requirements of these upcoming historic sporting events. Specifics on the locations and times of these events have not been finalized (especially for the Olympics), leaving SCE with a lack of information at this time for the potential infrastructure upgrade needs and other incremental one-time costs associated with these historic sporting events that will be held in Southern California during this GRC cycle. SCE will seek recovery of the costs recorded in the HSECTMA in a future GRC or other appropriate ratemaking proceeding.

Cybersecurity Compliance Memorandum Account (CCMA). The CCMA will record the revenue requirements associated with the incremental O&M expenses and capital expenditures that are incurred to adhere to emergent new cybersecurity regulations and requirements that are expected to be issued but for which the magnitude, scope, and timing is currently uncertain. SCE will seek reasonableness review and recovery of its recorded CCMA costs in either SCE's annual ERRA Review proceeding or in a subsequent GRC.

Renewable Transmission Projects Memorandum Account (RTPMA). In April 2023, the California Independent System Operator (CAISO) issued a new draft Transmission Planning Process plan that, if adopted, would require SCE to spend significantly more on Renewable Transmission Projects during the 2025 GRC cycle than previously anticipated. Because of the potential for significant cost increases during the 2025 GRC cycle that are both outside of SCE's control and unable to be reflected in SCE's forecast due to timing, SCE proposes to establish the RTPMA to track the CPUCjurisdictional Capital-related revenue requirement and Capital-related expense associated with costs spent on Renewable Transmission Projects that are incremental to the amounts authorized in the 2025 GRC based on SCE's March 2023 forecast. SCE will submit these costs to the Commission for reasonableness review and recovery in either SCE's ERRA Review application or in a subsequent GRC

application depending on the timing of when the projects are completed, to minimize the amount of interest expense that accrues on the recorded amounts.

B. Modification Of Certain Balancing/Memorandum Accounts

SCE seeks to modify ten balancing and memorandum accounts in this proceeding, as described below.

Wildfire Risk Mitigation Balancing Account (WRMBA)/ Grid Hardening Balancing Account (GHBA). In the 2021 GRC, the Commission authorized the establishment of the WRMBA to track the difference between authorized and recorded capital expenditures associated with SCE's Wildfire Covered Conductor Program (WCCP) over the 2019-2023 period. In this GRC, SCE proposes to expand the scope of the WRMBA to include additional grid hardening capital expenditures over the 2025 through 2028 period, in addition to post-2024¹² capital expenditures associated with WCCP. This expanded scope will include SCE's Targeted Undergrounding Program, Rapid Earth Fault Current Limiter activities and Long Span Initiative activities, in addition to WCCP. SCE also proposes to change the name of the account from WRMBA to GHBA to reflect this expanded scope. Finally, as a result of the additional uncertainty associated with forecasting this expanded scope of work, SCE proposes to eliminate or increase the spending threshold that requires additional reasonableness review. Additional reasonableness review is currently triggered when direct capital expenditures associated with activities authorized for recovery in the WRMBA exceed 110 percent of the authorized WCCP capital expenditures over the 2019-2023 period. As a result of the expanded scope, and to allow for more timely cost recovery of the more expansive grid hardening approach, it is appropriate to eliminate the reasonableness review threshold. If the Commission feels some level of threshold remains appropriate, SCE proposes to increase the threshold to 125 percent.

Vegetation Management Balancing Account (VMBA). In the 2021 GRC, the Commission authorized the establishment of the VMBA to record the difference between authorized and recorded

¹² In Track 4 of the 2021 GRC, SCE has proposed a separate "sub-account" of the WRMBA to track 2024 WCCP capital expenditures. That request remains pending at the time of the submission of this Application.

O&M expenses for vegetation management activities across SCE's service area. In this GRC, SCE proposes to continue the VMBA and requests an expanded scope for vegetation management activities to include vegetation management-related Environmental Services Department costs. Given the uncertainty of future California legislative and regulatory policymaking, potential changes to compliance requirements and the contractor labor market, SCE also proposes to eliminate the reasonableness review threshold or to increase it to 125 percent (current threshold is 115 percent in excess of the annual authorized VMBA revenue requirement).

Risk Management Balancing Account (RMBA). In the 2021 GRC, the Commission authorized the establishment of the RMBA to record the difference between actual insurance premium expenses for wildfire liability coverage, including the costs of alternative risk transfer instruments, and the authorized insurance premium expenses for wildfire liability coverage. As detailed above in Section II.D, SCE filed a Joint Petition for Modification (PFM) of the 2021 GRC Track 1 Final Decision with Cal Advocates and TURN to establish a wildfire liability self-insurance program, in lieu of purchasing wildfire liability insurance from the commercial insurance market. The parties filing the PFM agreed to support continuation of the wildfire liability self-insurance program in SCE's 2025 GRC cycle to provide customers additional savings. On April 14, 2023, a Proposed Decision was issued adopting the PFM and agreement on wildfire liability self-insurance without modification. If the PFM is granted by the Commission, SCE will modify the RMBA effective July 1, 2023 to effectuate the wildfire liability self-insurance program. In this GRC, SCE proposes to continue the RMBA consistent with the modifications proposed in the PFM.

Z-Factor Memorandum Account (ZFMA). In the 2021 GRC, the Commission authorized SCE to establish the ZFMA to track costs associated with events that are potential Z-Factors. SCE included the establishment of the ZFMA as part of its Post-Test Year Ratemaking Mechanism. In this GRC, SCE proposes to continue the ZFMA and to expand the applicability to include the GRC Test Year, as opposed to only GRC attrition years.

Medical Programs Balancing Account (MPBA). The MPBA records the difference between: (1) medical, dental and vision expenses authorized by the Commission, and (2) recorded medical, dental

and vision expenses, after capitalization. SCE proposes to continue the use of the MPBA during the 2025 GRC cycle, with a modification to the timing of the transfer to the Base Revenue Requirement Balancing Account (BRRBA) and the Portfolio Allocation Balancing Account (PABA). This change will provide for more timely recovery or return of the recorded over- or under-collection amounts consistent with annual transfers in the majority of SCE's other cost balancing accounts and will reduce interest expense to be paid by SCE's customers. For more information on the MPBA, please see Exhibit SCE-06, Volume 04, Employee Benefits, Training & Support.

Pension Costs Balancing Account (PCBA). The PCBA records the difference between: (1) pension expenses authorized by the Commission, and (2) recorded pension expenses, after capitalization. SCE proposes to continue the use of the PCBA during the 2025 GRC cycle, with a modification to the timing of the transfer to the BRRBA and the PABA. This change will provide for more timely recovery or return of the recorded over- or under-collection amounts consistent with annual transfers in the majority of SCE's other cost balancing accounts and will reduce interest expense to be paid by SCE's customers. For more information on the PCBA, please see Exhibit SCE-06, Volume 04, Employee Benefits, Training & Support.

Post-Employment Benefits Other Than Pensions Balancing Account (PBOPBA). The PBOPBA records the difference between: (1) Post-Employment Benefit Other than Pensions (PBOP) expenses authorized by the Commission, and (2) recorded PBOP expenses, after capitalization. SCE proposes to continue the use of the PBOPBA during the 2025 GRC cycle, with a modification to the timing of the transfer to the BRRBA and the PABA. This change will provide for more timely recovery or return of the recorded over- or under-collection amounts consistent with annual transfers in the majority of SCE's other cost balancing accounts and will reduce interest expense to be paid by SCE's customers. For more information on the PBOPBA, please see Exhibit SCE-06, Volume 04, Employee Benefits, Training & Support.

Service Center Modernization Projects Memorandum Account (SCMPMA). The SCMPMA records costs associated with service center modernization projects. SCE proposes to continue the SCMPMA over the 2025 GRC cycle, and to: (1) maintain certain modernization projects which are not

currently projected to be completed by the end of 2024; (2) add certain modernization projects given the uncertainties surrounding them; and (3) no longer record costs associated with certain modernization projects as those projects are expected to be completed by the end of 2024. Please see Exhibit SCE-06, Volume 07, Enterprise Operations, for more information on the various service center modernization projects.

Catalina Repower Memorandum Account (CRMA). The costs associated with the Catalina Repower Project, including the costs to replace six diesel electric generators to meet new emissions requirements, are tracked in the CRMA. As of the filing date of this Application, the Catalina Repower Project is not complete and is not expected to be placed in service prior to 2025. Therefore, SCE proposes to maintain the CRMA during the 2025 GRC cycle but to modify the disposition section of the CRMA Tariff to allow SCE to seek cost recovery via the submission of a Tier 3 advice letter upon project completion, instead of carrying these capital costs without recovery (and accumulating interest expense for customers) until 2029 (*i.e.*, SCE's next GRC after 2025). Please see Exhibit SCE-05, Volume 01, Generation, for more information on the Catalina Repower Project.

Electric Vehicle Infrastructure Memorandum Account (EVIMA). Pursuant to Assembly Bill (AB) 841 (Stats. 2020, Ch.3.72), SCE established the EVIMA to track costs incurred by SCE related to electric vehicle infrastructure installed under the provisions of SCE's Electric Rule 29 between January 1, 2021 and the implementation date of SCE's next GRC, currently anticipated to be January 1, 2025. SCE's EVIMA Tariff provides that the costs tracked in the EVIMA be reviewed for reasonableness in SCE's next GRC (*i.e.*, its Test Year 2025 GRC) or in any other proceeding deemed appropriate by the Commission. As of December 31, 2022, SCE has not recorded any costs in the EVIMA, and does not expect to record costs in the EVIMA until 2023 and 2024. Therefore, given this timing issue, SCE requests that the final decision in this proceeding authorize SCE to modify its EVIMA Tariff to allow SCE to submit the 2023 and 2024 costs recorded in the EVIMA for reasonableness review and recovery via a Tier 3 advice letter. This will allow SCE to receive more timely recovery of these costs as opposed to having to wait to submit these costs for reasonableness review and recovery in SCE's 2029 GRC—a full six years after when the costs would start to be incurred.

C. <u>Elimination Of Certain Balancing/Memorandum Accounts</u>

SCE proposes to eliminate the following five balancing and memorandum accounts in this proceeding.

Underground Structures Replacement Balancing Account (USRBA). The USRBA will be eliminated once the December 31, 2024 balance is transferred to the distribution subaccount of the BRRBA because SCE intends to complete the work needed to upgrade certain high-risk underground structures identified for balancing account treatment in the 2021 GRC cycle, prior to 2025.

Pole Loading and Deteriorated Pole Programs Balancing Account (PLDPBA). SCE proposes to eliminate the PLDPBA, as the pole loading assessment programs, the costs for which were tracked in this balancing account, are concluding prior to 2025 and the work is transitioning back to a forecastable compliance program. The cumulative recorded activity in the PLDPBA in 2021 and 2022 is provided in Exhibit SCE-02, Volume 09, Poles.

Customer Service Re-Platform Memorandum Account (CSRPMA). The CSRPMA tracks costs related to SCE's Customer Service Re-Platform project from project inception to project close. In SCE-03, Volume 01, Customer Service Operations, SCE sets forth an estimate of the remaining capital expenditures and O&M costs and reimbursable benefits that have been, or are expected to be, incurred or realized from January 2022 through December 2024. Because SCE is including all 2025 and forward costs in its forecast, SCE proposes to close and eliminate the CSRPMA once the final amounts recorded in the CSRPMA have been transferred to the distribution subaccount for recovery in customers' rates.

Seismic Retrofit for Non-Electric Facilities Memorandum Account (SRNEFMA). The SRNEFMA records incremental Capital-related revenue requirements above those authorized in Track 1 of SCE's 2021 GRC associated with the seismic retrofits of SCE's non-electric facilities. The Commission authorized the establishment of the SRNEFMA because, at the time of the 2021 GRC, SCE lacked historical experience for these types of seismic projects, and therefore, was not authorized full forecast funding. That rationale no longer applies. As discussed in Exhibit SCE-04, Volume 01, Business Continuation, and Exhibit SCE-06, Volume 07, Enterprise Operations, SCE has completed all

assessments for its remaining seismic work for non-electric facilities through 2028, which allows SCE to forecast the amount of funding needed to complete this work.

NEM Online Application System Memorandum Account (NEMOASMA). The

NEMOASMA was established to track the costs SCE incurred to establish an online application system for processing applications for interconnection under SCE's NEM tariffs. SCE has completed the implementation of its NEM Online Application System and will no longer need to record incremental costs in the NEMOASMA as of January 1, 2025. Therefore, SCE proposes to close the NEMOASMA effective January 1, 2025, and to eliminate the NEMOASMA as part of the advice letter implementing a final decision in this proceeding.

D. <u>Recovery Of Memorandum Account Balances</u>

SCE requests that the Commission find reasonable SCE's recorded entries in its Seismic Retrofit for Non-Electric Facilities Memorandum Account (SRNEFMA), Customer Service Re-Platform Memorandum Account (CSRPMA), Service Center Modernization Projects Memorandum Account (SCMPMA), Distribution Deferral Administrative Costs Memorandum Account (DDACMA), Emergency Customer Protections Memorandum Account (ECPMA), Residential Disconnections Implementation Cost Memorandum Account (RDICMA), NEM Online Application System Memorandum Account (NEMOASMA), California Consumer Privacy Act Memorandum Account (CCPAMA), Avoided Cost Calculator Memorandum Account (ACCMA), Community Choice Aggregators Audit Memorandum Account (CCAAMA), and Wildfire Mitigation Plan Memorandum Account (WMPMA) memorandum accounts,¹³ and its forecast for those accounts through December 31, 2024, and authorize the transfer of the December 31, 2024 balance to an applicable revenue balancing account, as specified, for cost recovery. The cumulative recorded (January 2021-December 2022 and forecast (January 2023-December 2024) memorandum account balances for which SCE seeks recovery

¹³ SCE is only seeking recovery of the costs related to fusing mitigation that are currently being tracked in the WMPMA in this Application. The remaining WMPMA balance is sought for recovery in SCE's WM/VM proceedings, as discussed above.

is \$95.570 million. SCE will update for more recent recorded data in its GRC Update Testimony and will provide the final recorded December 31, 2024 balances in the advice letter implementing the 2025 GRC decision.

V.

OTHER ISSUES

A. Impact Of Assembly Bill No. 1054 On This GRC

1. <u>Capital Expenditures Excluded from Equity Rate Base</u>

On July 12, 2019, the California Legislature passed AB 1054, which is codified at P.U.C. Section 8386, *et seq.* Among other requirements, AB 1054 precludes California's three large IOUs from including in their respective equity rate bases the collective first \$5 billion of capital expenditures incurred pursuant to a Commission-approved WMP. Specifically, the statute states:

The commission shall not allow a large electrical corporation to include in its equity rate base its share, as determined pursuant to the Wildfire Fund allocation metric specified in Section 3280, of the first five billion dollars (\$5,000,000,000) expended in aggregate by large electrical corporations on fire risk mitigation capital expenditures included in the electrical corporations' approved wildfire mitigation plans.¹⁴

SCE's share of the \$5 billion total pursuant to the statutory allocation metric is 31.5% (i.e.,

\$1.575 billion). SCE excluded from its equity rate base the first \$1.575 billion of total wildfire mitigation-related capital expenditures (direct capital expenditures plus associated capitalized overheads) starting as of August 1, 2019 through 2021. On April 20, 2023, SCE transmitted the Issuance Advice Letter, Advice 5018-E, pursuant to its third and final AB 1054 financing order¹⁵ of the capital expenditures excluded from equity rate base.

<u>14</u> P.U.C. Section 8386.3(e).

<u>15</u> D.23-02-023.

2. <u>AB 1054 Chief Executive Officer Certification</u>

Section 8386.4 of the Public Utilities Code governs recovery for costs related to approved WMPs, and requires "[t]he chief executive officer of an electrical corporation [to] certify in each general rate case application that the electrical corporation has not received authorization from the commission to recover the costs in a previous proceeding, including wildfire cost recovery applications."¹⁶ This provision is intended to bar double recovery of WMP-related costs that have already been approved elsewhere (*e.g.*, in previous wildfire cost recovery applications). The "AB 1054 Certification of Mr. Steven Powell,"¹⁷ attached hereto as Appendix C, so certifies.¹⁸

B. Previously Litigated Issues On Which The Commission Has Taken A Position

The cost estimates and requests included in SCE's Test Year 2025 GRC are consistent with applicable laws. In resolving SCE's 2018 GRC, the Commission suggested that SCE should "provid[e] an explanation as to what has changed to warrant a different outcome" when "renew[ing] previously denied arguments."¹⁹ SCE sets forth three important examples below.²⁰

1. <u>Customer Deposits</u>

In SCE's previous GRC decisions, including its 2021 GRC Decision, D.21-08-036, the Commission has required customer deposits to be adjusted to reduce its working cash requirement, which offsets rate base by the balance of customer deposits, except for 10% of the balance which are deposited in minority-owned financial institutions. SCE's position is that customer deposits should not

<u>16</u> P.U.C. Section 8386.4(b)(3).

¹⁷ Mr. Powell has also executed the required Rule 1.11 Officer Verification, which is attached to this Application.

¹⁸ That certification also covers Section 451.3 of the Public Utilities Code, added by AB 1054, which would permit (not require) the Commission to issue penalties if the utility re-requests previously authorized wildfire mitigation plan-related costs.

¹⁹ D.19-05-020, p. 390.

²⁰ SCE also notes that examples exist where SCE believes its position is justified but does not seek to re-litigate the issue. SCE's decision to forgo requesting any funding for the Service Guarantees program in this GRC is one such instance.

be such an adjustment. Customer deposits are funds collected from customers for security against nonpayment; they will be returned to those same customers or used as a credit against their bills in the event of non-payment if the customer pays their bills for 12 consecutive months. Historically, customer deposits have been collected from residential and non-residential customers; however, after a recent Commission decision,²¹ SCE suspended collecting deposits from residential customers seeking new or reestablished service and non-residential customers seeking to reestablish service.

SCE remains the only California energy utility subject to this rate base adjustment for customer deposits. Given this ongoing disparity and the trend of declining customer deposit balances, SCE is requesting that the Commission reconsider its treatment of SCE's customer deposits, and permit SCE to adopt the ratemaking treatment that the Commission has adopted for Pacific Gas and Electric Company (PG&E) and upheld in its recent Cost of Capital decision.²² Specifically, PG&E's customer deposits are included as part of its authorized capital structure as a form of low-cost debt. This request is discussed in Exhibit SCE-07, Volume 02, Rate Base, Depreciation Expense, and Taxes.

2. <u>Short-Term and Long-Term Incentive Compensation</u>

With respect to short-term incentive compensation, SCE has revised its Corporate goals to be more quantitative (as emphasized in AB 1054) and to more explicitly advance customer interests, consistent with prior Commission precedent. These changes have resulted in the removal of goals focused on policy objectives and reduction in the weighting of financial metrics. SCE has again hired an independent expert to perform a Total Compensation Study. For SCE's 2025 GRC, SCE used Willis Towers Watson (WTW), the expert used by both PG&E and San Diego Gas & Electric Company (SDG&E) to perform that study for their most recent GRCs. The study compares SCE's total compensation—salaries, benefits, and long- and short-term incentives—to compensation offered at other employers in the relevant labor markets.

<u>21</u> D.20-06-003, p. 44.

²² D.19-12-056, CoL No. 27, p. 54.

WTW's Total Compensation Study demonstrates that the total compensation paid to SCE employees, inclusive of short-term incentives, is at market. Despite SCE's total compensation also being at market in previous GRCs, the Commission's decisions in the 2012, 2015, 2018 and 2021 GRCs allowed only partial recovery of short-term incentives to SCE's employees. This rejection is fundamentally incompatible with cost-of-service ratemaking principles, bypasses evidence of SCE's market-level compensation, and ignores the customer benefits arising from the use of incentive compensation programs, particularly given that SCE returns any unused authorized funds for short-term incentive compensation through the one-way memorandum account back to its customers.

The majority of SCE's employees participate in SCE's short-term incentive compensation programs. When the Company has the ability to vary an individual's compensation level based on performance, it also serves as a disincentive for employees to "settle" for lesser levels of performance or productivity in carrying out their job duties. A compensation design that uses base salary plus incentives is standard in the utility industry, as well as many other industries, and is proven to achieve better results.

However, the Commission has repeatedly assigned a portion of the costs of SCE's short-term incentive programs to shareholders based on the proportion of the Corporate goals tied to meeting "core earnings" targets. This disallowance improperly mandates that shareholders fund expenses that benefit SCE's customers. All of the annual goals that corporate performance and incentive compensation for the majority of SCE employees are measured against provide benefits to customer. Nevertheless, SCE's revised goals reflect the Commission's repeated direction to shift incentives towards goals that more explicitly benefit customers, such as safety and operational goals.

Accordingly, SCE respectfully requests full cost recovery for the short-term incentive compensation it pays to its employees. The majority of SCE's employees are eligible to receive it, and it is an important part of their market-based compensation. If SCE were to *not* pay its employees this variable incentive compensation, its employees would be compensated well below market.

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With respect to long-term incentive compensation, it is a particularly important benefit during tight labor markets with high turnover—as is the case now. Long-term incentive compensation helps in retaining valuable employees, thereby providing a cost-saving benefit.

SCE has discontinued its Key Contributor Incentive Plan (KCIP), the long-term incentive program for non-executives in effect at the time of SCE's 2021 GRC Application. In 2021, SCE launched a Long-Term Incentive Plan (LTIP) for non-executive principal-level employees, attorneys, and some project managers. LTIP has a three-year vesting period to encourage employee retention and help sharpen the focus on meeting SCE's long-term performance objectives.

SCE has a separate long-term incentive compensation program for its executives, which is referred to in testimony as LTI. SCE has removed from its forecast the Long-Term Incentive compensation for SCE's executive officers, in accordance with Public Utilities Code Section 706 and the CPUC's decision in SCE's 2021 GRC (D.21-08-036). For these executive officers, the entirety of their compensation is barred from being customer funded. SCE intends to advocate in legal briefing that California enacted a limited exception to the regulatory compact through PUC Section 706 by prohibiting recovery of compensation paid to SCE's executive officers, much of which is in the form of LTI. Any disallowance of market based LTI or LTIP compensation beyond the narrow prohibition in PUC Section 706 would be inconsistent with the regulatory compact and the legislative intent reflected by PUC Section 706 and AB 1054.

3. <u>Fusing Mitigation</u>

In its 2021 GRC Track 3 request, SCE sought reasonableness review of the \$24.62 million (nominal \$) incremental to amounts authorized in the Grid Safety and Resiliency Program settlement for fusing mitigation program capital expenditures from 2018-2020. In Track 3, the Commission did not approve cost recovery of \$24.62 million incremental costs related to SCE's fusing mitigation program in the HFRA. Notably, however, the Track 3 Decision did not disallow SCE's fusing mitigation program cost recovery request, much less subject the capital costs to a permanent disallowance. The Decision merely held that based on the record in Track 3, it was unable to find that SCE had acted prudently at

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that time. Moreover, because these costs are tracked in a memorandum account, there is no retroactive ratemaking issue with authorizing recovery as part of this proceeding. Accordingly, in Exhibit SCE-04 Volume 05, Wildfire Management, SCE includes additional evidence demonstrating that SCE acted prudently and should be able to recover all costs associated with the fusing mitigation program.

C. <u>Customer Accessibility Issues</u>

In advance of the filing of this GRC, SCE proactively approached Center for Accessible Technology (CforAT) to explore developing a joint proposal to cover the 2025 GRC cycle to build on previous progress promoting accessibility for SCE's customers who have disabilities. As set forth in Exhibit SCE-09, Accessibility, and building on work done in previous GRCs, in this proceeding SCE and CforAT have jointly developed the proposal. SCE and CforAT propose that SCE spend or incur \$1.25 million on average per year over the 2025 GRC cycle on eligible activities supporting and enhancing the accessibility of SCE's facilities, programs, communications, and services for customers with disabilities. The expenses for eligible activities are distinguished from spending on accessibility issues required by Commission decisions in other proceedings.

D. <u>Affordability Metrics</u>

Decision 22-08-023, Decision Implementing the Affordability Metrics, issued in the OIR to Establish a Framework and Processes for Assessing the Affordability of Utility Service (R.18-07-006), requires SCE, in any initial filing in any proceeding with a revenue increase estimated to exceed one percent of currently-authorized revenues systemwide, to include certain affordability metric information.²³

²³ D.22-08-023, Ordering Paragraphs 5-6.

Specifically, SCE is required to provide the following:

- For revenues in effect at the time of the filing:
 - The Affordability Ratio²⁴ 20 (AR20)²⁵ by climate zone, Affordability Ratio 50 (AR50)²⁶ by climate zone, and Hours at Minimum Wage (HM)²⁷ associated with those existing revenues;
 - Essential usage bills by climate zone, underlying the affordability metrics associated with those existing revenues;
 - o Average usage bills by climate zone associated with those existing revenues; and
 - For climate zones with Areas of Affordability Concern (AAC), as defined in the most recent annual Affordability Report,²⁸ AR20 by climate zones subdivided by Public Use Microdata Area.
- For the proposed revenues:
 - Changes in the AR20 by climate zone, AR50 by climate zone, and HM associated with the proposed new revenue requested, annually for each year in which new revenues are proposed;
 - Essential usage bills by climate zone, underlying the affordability metrics associated with proposed revenues;
 - o Average usage bills by climate zone associated with proposed revenues; and

 $[\]frac{24}{i.e.}$ The Affordability Ratio or AR is the ratio of essential utility service bills to non-disposable household income (*i.e.*, household income after removing costs for housing and other essential utility services).

 $[\]frac{25}{25}$ AR20 displays the AR for a representative hypothetical household at the lower-end (20th percentile), resourcewise, compared to others in a community.

 $[\]frac{26}{10}$ The AR50 displays the AR for a representative hypothetical household in the middle (50th percentile), resource-wise, compared to others in a community.

²⁷ The HM metric seeks to describe the hours of work necessary for a household earning minimum wage to pay for essential utility service charges.

²⁸ AACs are census tracts that lie in geographic areas where AR20 values are greater than the affordability demarcation for a particular essential service. The affordability demarcations are defined as the point of inflection in each industry's AR20 distribution of values, based on the observed data in the most recently available Affordability Report from the Commission. The Commission's 2020 Affordability Report, the most recent report at the time of this filing, uses 15% as the demarcation for electric service. 2020 Annual Affordability Report, Oct. 2022, p. 12.

 For climate zones with Areas of Affordability Concern (AAC), as defined in the most recent annual Affordability Report, AR20 by climate zones subdivided by Public Use Microdata Area.

Appendix D to this Application includes the affordability metrics required by D.22-08-023. For more detailed analyses of these affordability metrics and affordability generally, please refer to Exhibit SCE-07, Volume 04, Chapter II, Affordability.

E. <u>Environmental Social Justice Issues</u>

SCE wholeheartedly supports the Commission's Environmental and Social Justice (ESJ) Action Plan and its operating framework (goals, objectives, action items) through which the Commission is working to integrate ESJ considerations throughout its operations. Although the Plan's framework applies specifically to the Commission's operations, SCE also takes important ESJ goals into consideration as it performs its work. This includes work funded through this GRC. To cite three important examples, SCE's proposed investments in this GRC will:

- Enable SCE to make many investments necessary to support California's transition into the clean energy future and strengthen the resilience of its assets, operations, and service to the effects of climate change as guided by the CAVA. An economy reliant on clean electricity will lead to significant improvements in local air quality and public health, the burden of which has long been disproportionately borne by lower-income Californians and communities.
- Facilitate prudently and proactively replacing outdated infrastructure for grid reliability and safety reasons, with consideration of a circuit's location in disadvantaged communities as an important factor when deciding which work to prioritize first.
- Continue SCE's steadfast commitment to developing and maintaining working partnerships with its diverse suppliers (Women, Minority, Service-Disabled Veteran, Lesbian, Gay, Bisexual and Transgender) and persons with disability business

enterprises, consistent with the ESJ goal of promoting economic and workforce development opportunities in ESJ Communities.

In 2021, SCE's \$2.44 billion in spend with over 620 diverse suppliers translated into 22,987 jobs, \$1.5 billion in wages earned, and \$1.2 billion in taxes.²⁹

VI.

STATUTORY AND REGULATORY REQUIREMENTS

A. <u>Statutory And Other Authority – Rule 2.1</u>

Rule 2.1 requires that all applications: (1) clearly and concisely state the authorization or relief sought; (2) cite the statutory or other authority under which that relief is sought; and (3) be verified by the applicant. Rules 2.1(a), 2.1(b), and 2.1(c) set forth further requirements that are addressed separately below. The relief being sought is summarized in Sections I, II, III, IV, and V above, and is further described in the testimony accompanying this Application. The statutory and other authority under which this relief is being sought include California Public Utilities Code Sections 314.5, 377, 451, 454, 463, 463.5, 491, 701, 728, 728.1, 729, 740, 740.1, 795, 850, 850.1, 854, 854.2, 3293, 8386 *et al.*, the Commission's Rules of Practice and Procedure, and prior decisions, orders, and resolutions of this Commission, including D.14-12-025 (Decision Incorporating a Risk-Based Decision-Making Framework into the Rate Case Plan). This Application has been verified by an SCE officer as provided in Rule 1.11.

B. Legal Name And Correspondence – Rules 2.1(a) & 2.1(b)

Pursuant to Rules 2.1(a) and 2.1(b),³⁰ Southern California Edison Company (SCE) is a public utility organized and existing under the laws of the State of California. The location of SCE's principal place of business is: 2244 Walnut Grove Avenue, Rosemead, California 91770.

²⁹ SCE 2022 Supplier Diversity Annual Report & 2023 Annual Plan.

³⁰ Rule 2.1(a) requires the application to state the exact legal name of the applicant and the location of its principal place of business, and, if a corporation, the state under the laws of which the applicant is organized. Rule 2.1(b) requires the application to state the name, title, address, telephone number, facsimile transmission

Correspondence or communications regarding this Application should be addressed to:

Case Administration Southern California Edison Company Post Office Box 800 8631 Rush Street Rosemead, California 91770 Telephone: 626-302-8146 E-mail: <u>scegrc@sce.com</u>

C. <u>Proposed Categorization, Need For Hearings, Issues To Be Considered, Proposed Schedule</u> <u>– Rule 2.1(c)</u>

Commission Rule 2.1(c) requires that all applications shall state the "proposed category for the proceeding, the need for hearing, the issues to be considered including relevant safety considerations, and a proposed schedule."³¹ SCE proposes that this Application be designated a "ratesetting" proceeding, as defined in California Public Utilities Code Section 1701.1(d)(3) and Rule 1.3(g).³² The need for hearings and the issues to be considered in such hearings will depend in large part on the degree to which other parties contest SCE's request, but SCE anticipates that evidentiary hearings will be necessary. In Exhibit SCE-06, Volume 06, SCE provides testimony on its corporate safety programs. In addition, where relevant, SCE has included testimony on relevant risk factors, including safety and reliability, in the other volumes of testimony.³³

SCE proposes the following procedural schedule, which is aligned with the Commission's modified Rate Case Plan (RCP) schedule from D.20-01-002 and would ensure a timely decision.

number, and e-mail address of the person to whom correspondence or communications in regard to the application are to be addressed.

³¹ TITLE 20 CAL. CODE REGS. §2.1(c).

^{32 &}quot;Ratesetting cases, for purposes of this article, are cases in which rates are established for a specific company, including, but not limited to, general rate cases, performance-based ratemaking, and other ratesetting mechanisms." CAL. PUB. UTIL. CODE §1701.1(d)(3). "Ratesetting' proceedings are proceedings in which the Commission sets or investigates rates for a specifically named utility (or utilities) or establishes a mechanism that in turn sets the rates for a specifically named utility (or utilities)." TITLE 20 CAL. CODE REGS §1.3(g).

³³ See, e.g., Exhibit SCE-01, Volume 02, Risk Policy, Climate Change Policy, and Environmental & Social Justice Goals.

Event	SCE Proposal
Application Filed	5/12/2023
Mandated Workshop	5/30/2023
Protests and Responses to Application	6/12/2023
Prehearing Conference	6/30/2023
Scoping Memo of Assigned Commissioner	8/15/2023
Public Participation Hearings	TBD
Public Advocates Office and Other	
Intervenor Direct Testimony	12/15/2023
SCE Supplemental Testimony on Palo	
Verde Nuclear Generation Station	12/22/2023
Concurrent Rebuttal Testimony	1/30/2024
Mandatory Meet & Confer	2/9/2024
Evidentiary Hearings	2/26-3/15/2024
Update Testimony	3/29/2024
Hearings on Update Testimony	4/10-4/12/2024
Joint Comparison Schedule	4/22/2024
Opening Briefs	4/22/2024
Reply Briefs	5/13/2024
Status Conference	8/5/2024
Proposed Decision	11/1/2024
Final Decision	12/2/2024

D. Organization And Qualification To Transact Business – Rule 2.2

A copy of SCE's Certificate of Restated Articles of Incorporation, effective on March 2, 2006, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 14, 2006, in connection with Application No. 06-03-020,³⁴ and is incorporated herein by this reference pursuant to Rule 2.2³⁵ of the Commission's Rules of Practice and Procedure.

A copy of SCE's Certificate of Determination of Preferences of the Series D Preference Stock filed with the California Secretary of State on March 7, 2011, and presently in effect, certified by the California Secretary of State, was filed with the Commission on April 1, 2011, in connection with Application No. 11-04-001, and is incorporated herein by this reference.

³⁴ Application 06-03-020, For Approval of Early Transfer of Anaheim's Share of SONGS 2&3 to SCE.

³⁵ Rule 2.2 requires the applicant to submit a copy of its organizing documents and evidence of its qualification to transact business in California, or to refer to that documentation if previously filed with the Commission.

A copy of SCE's Certificate of Determination of Preferences of the Series E Preference Stock filed with the California Secretary of State on January 12, 2012, and a copy of SCE's Certificate of Increase of Authorized Shares of the Series E Preference Stock filed with the California Secretary of State on January 31, 2012, and presently in effect, certified by the California Secretary of State, were filed with the Commission on March 5, 2012, in connection with Application No. 12-03-004, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series F Preference Stock filed with the California Secretary of State on May 14, 2012, and presently in effect, certified by the California Secretary of State, was filed with the Commission on June 29, 2012, in connection with Application No. 12-06-017, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series G Preference Stock filed with the California Secretary of State on January 24, 2013, and presently in effect, certified by the California Secretary of State, was filed with the Commission on January 31, 2013, in connection with Application No. 13-01-016, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series H Preference Stock, filed with the California Secretary of State on February 28, 2014, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 24, 2014, in connection with Application No. 14-03-013, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series J Preference Stock, filed with the California Secretary of State on August 19, 2015, and presently in effect, certified by the California Secretary of State, was filed with the Commission on October 2, 2015, in connection with Application No. 15-10-001, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series K Preference Stock, filed with the California Secretary of State on March 2, 2016, and presently in effect, certified by the California Secretary of State, was filed with the Commission on April 1, 2016, in connection with Application No. 16-04-001, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series L Preference Stock filed with the California Secretary of State on June 20, 2017, and presently in effect, certified by the California Secretary of State, was filed with the Commission on June 30, 2017, in connection with Application No. 17-06-030, and is incorporated herein by this reference.

Copies of SCE's latest Annual Report to Shareholders and Edison International's latest proxy statement was sent to its stockholders and has been sent to the Commission with an Energy Division Central Files Document Coversheet dated March 17, 2023, pursuant to General Order Nos. 65-A and 104-A of the Commission.

E. <u>Balance Sheet And Income Statement – Rule 2.3 & Rule 3.2(a)(1)</u>

Appendix A to this Application contains copies of SCE's Balance Sheet and Income Statement for the period ending March 31, 2023, the most recent period available.

F. Present And Proposed Rates – Rule 3.2(a)(2) & Rule 3.2(a)(3)

The presently effective rates proposed to be changed, and the changes proposed to be made thereto are addressed in Exhibit SCE-07, Volume 01, Results of Operations. Proposed tariff sheets reflecting SCE's revenue allocation and rate design proposals will be addressed in Phase 2 of this proceeding.

If the Commission were to allocate the increase in 2025 revenues shown in Table 1 to SCE's customer groups on a System Average Percentage Change basis, the impact on each customer group would be as shown in Table 4.

Bundled Average Rates (¢/kWh)*				
Customer Group	2024**	Proposed	Proposed	%
customer oroup	2024	Change	Rates	Change***
Residential	32.29	3.42	35.71	10.6%
Lighting - Small and Medium Power	28.38	2.89	31.26	10.2%
Large Power	19.92	1.37	21.29	6.9%
Agricultural and Pumping	23.44	2.00	25.44	8.5%
Street and Area Lighting	29.11	1.36	30.48	4.7%
Standby	17.24	1.07	18.31	6.2%
Total	27.11	2.45	29.56	9.0%

Table 4Estimated Impact Of This Request On Customer Rates

Residential Bill Impact (\$/Month)*														
Description	,	024**	Pr	oposed		2025	%							
Description	2	024	C	hange	Pı	oposed	Change***							
Non-CARE Residential Bill	\$	170.39	\$	17.49	\$	187.88	10.3%							
CARE Residential Bill	\$	115.35	\$	11.83	\$	127.18	10.3%							

*These rate and bill impacts exclude greenhouse gas (GHG) revenues.

**2024 rate and bill impacts are derived by starting with SCE's approved March 1, 2023 rates and (1) layering on the revenue changes associated with SCE's 2021 GRC Track 4 (A.19-08-013) authorized base revenue requirement request, adjusted for the adopted Cost of Capital in D.22-12-031 (as modified in D.23-01-022), and the change to the wildfire liability insurance portion of the authorized base revenue requirement requested in a Petition for Modification of D.21-08-036, and (2) adjusting for estimated 2024 sales.

***The percentage change in this table is based on the impact SCE's 2025 GRC request has on overall rates (which include non-GRC revenues) in 2025.

The increases shown in Table 4 are illustrative only. Revenue allocation and rate design issues associated with this filing will be addressed in a separate phase (commonly known as a "GRC Phase 2"). In addition, the rates will be updated consistent with the Commission's decision(s) in this proceeding to reflect SCE's then-current authorized revenues when such rates are implemented. SCE's current rates and charges for electric service are in its electric tariffs and schedules on file with the Commission. These tariffs and schedules are filed with and made effective by the Commission in its decisions, orders, resolutions, and approvals of advice letters pursuant to Commission General Order 96-B.

G. <u>Description Of SCE's Property And Equipment, Original Cost Thereof, And Depreciation</u> <u>Reserve – Rule 3.2(a)(4)</u>

SCE's service territory is located throughout Central and Southern California and includes approximately 200 incorporated communities as well as outlying rural territories. A list of the cities and counties served by SCE is attached hereto as Appendix B.

SCE is engaged in the business of generating, transmitting, and distributing electric energy in portions of Central and Southern California. In addition to its properties in California, SCE owns, jointly with others, a facility located in Arizona and another in Nevada.

SCE owns and operates 33 hydroelectric plants located throughout Central and Southern California, one combined-cycle gas plant with two units, five gas-fired peaker units, a diesel-driven electric generating plant, and 25 solar photovoltaic sites (rooftop solar plants in Southern California, as well as one ground-based solar plant located in Central California). SCE has a 78.21% interest in San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 located in Southern California. SCE does not operate, but owns, a 15.8% interest in Palo Verde Nuclear Generating Station Units 1, 2, and 3 located in Arizona.

Pursuant to Commission Order in Decision No. 49665, dated February 16, 1954, SCE has, since 1954, used straight-line remaining life depreciation for computing book depreciation expense for accounting and ratemaking purposes. The original cost and depreciation reserve applicable to SCE's property and equipment are shown in the Balance Sheet attached as Appendix A of this Application, and in the schedules included in Exhibit SCE-07, Volume 03, SCE Asset Depreciation Study.

H. <u>Summary Of Earnings – Rule 3.2(a)(5)</u>

A summary of earnings on a depreciated rate base is shown in Table 1, above.

I. <u>Tax Depreciation – Rule 3.2(a)(7)</u>

Pursuant to Commission Decision No. 59926, dated April 12, 1960, SCE uses accelerated depreciation for income tax purposes and "flows through" reductions in income tax to ratepayers within

the Commission's jurisdiction for property placed in service prior to 1981. Pursuant to Decision No. 93848 in Order Instituting Investigation (OII) No. 24, SCE uses the Accelerated Cost Recovery System (ACRS) in determining depreciation for federal income tax purposes and "normalizes" the depreciation timing differences to ratepayers for property placed in service after 1980 in compliance with the Economic Recovery Tax Act of 1981. Pursuant to Decision No. 86-01-061 in OII No. 86-11-019, Phase II, SCE uses the Modified Accelerated Cost Recovery System (MACRS) in determining depreciation for federal income tax purposes and, in compliance with the Tax Reform Act of 1986, continues to "normalize" depreciation timing differences to ratepayers for property placed in service after 1986.

J. <u>Proxy Statement – Rule 3.2(a)(8)</u>

Certain classes and series of SCE's, as well as SCE's parent company's, Edison International's, capital stock is listed on a "National Securities Exchange" as defined in the Securities Exchange Act of 1934.

Three copies of the 2023 Edison International and SCE joint proxy statement were provided to the Commission in compliance with Ordering Paragraph No. 1 of Decision No. 88-01-063, Condition No. 5d, by a letter of transmittal dated March 17, 2023.

K. <u>Statement Pursuant To Rule 3.2(a)(10)</u>

Rule 3.2(a)(10) requires that the "application of electrical ... corporations shall separately state whether or not the increase reflects and passes through to customers only increased costs to the corporation for the services or commodities furnished by it." SCE's Application includes a request for authorization to add various capital expenditures to rate base. These requested rate base additions would earn a return on, as well as a return of, capital. In that sense, SCE's request in this proceeding is not limited to passing through to customers "only increased costs to the corporation for the services or commodities furnished by it."

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L. <u>Service Of Notice – Rules 3.2(b)-(e)</u>

As required by Rule 3.2(b), a notice stating in general terms the proposed increases in rates will be mailed to the designated officials of the state, and to the cities and counties listed in Appendix B. As required by Rule 3.2(c), notice will be published in a newspaper of general circulation in each county in SCE's service territory within which the rate changes would be effective. A list of the cities and counties affected by the increases proposed in this Application is attached as Appendix B. Pursuant to Rule 3.2(d), notice shall be furnished to customers affected by the proposed increase by including such notice with the regular bills mailed to those customers and by electronically linking to such notice for customers that receive their bills electronically. Finally, pursuant to Rule 3.2(e), SCE will file proof of compliance with the notice requirements of Rules 3.2(b)-(d) within 20 days after compliance with the last of these subsections that is applicable.

M. Treatment Of Confidential Information

In September 2017, the Commission issued D.17-09-003 in R.14-11-001 updating General Order 66-D³⁶ regarding the submission of confidential information to the Commission. SCE's May 12, 2023 submission of confidential information to the Commission (testimony, workpapers, and data request responses) complies with the requirements of D.17-09-003 and the Commission's subsequent decisions in R.14-11-001.³⁷ As such, SCE has submitted a declaration executed by an officer (or authorized designee) supporting SCE's submission of any confidential master data request response, as well as any volume of testimony or workpaper that contains confidential information.

N. Other Information

In Appendix A of Decision No. 07-07-004 on the Rate Case Plan,³⁸ the Commission required the submission of a compliance exhibit as part of the utilities' Notice of Intent (NOI) for a general rate case

 $[\]frac{36}{100}$ The Commission issued General Order 66-D in D.16-08-024.

<u>37</u> D.19-01-028, D.20-08-031, and D.21-11-020.

<u>38</u> D.07-07-004, Appendix A, pp. A.30 – A.33.

application.³⁹ Although SCE is no longer required to submit an NOI,⁴⁰ SCE has still submitted a compliance exhibit as Exhibit SCE-08.⁴¹

O. <u>Service List</u>

The official service list has not yet been established in this new proceeding. SCE is serving this Application and supporting testimony on the service list established by the Commission for SCE's 2021 Test Year GRC, A.19-08-013; SCE's RAMP, A.22-05-013; and RCP Rulemaking, R.13-11-006.

VII.

CONCLUSION AND REQUEST FOR RELIEF

SCE respectfully asks the Commission to authorize the revenue adjustments and other requests included herein to become effective January 1, 2025, and to issue its decision:

- Finding reasonable the requested ABRR and ordering that ABRR to be made effective January 1, 2025;
- Ordering the concurrent withdrawal and cancellation of existing rates, charges, and classifications to be superseded by rates and other tariff changes that reflect the revenues requested herein;
- Approving as reasonable the establishment of the GLIBA, the NGESMA, the AMIMA, the HSECTMA, the CCMA, and the RTPMA;
- 4. Approving as just and reasonable the amounts recorded in the SRNEFMA, CSRPMA, SCMPMA, DDACMA, ECPMA, RDICMA, NEMOASMA, CCPAMA, ACCMA,

³⁹ See Section 7.A on p. A-32 of Appendix A in D.07-07-004 ("All studies and information required to be submitted in the rate case by the Commissioner in prior rate decisions and subsequent policy statements of decisions.").

 $[\]frac{40}{2}$ See D.14-12-025 where the CPUC eliminated the requirement for utilities to submit an NOI.

⁴¹ In addition, SCE is still submitting in its 2025 GRC other requirements previously identified for the NOI, such as five years of recorded data, adjustments, etc. *See* page A-31 of Appendix A in D.07-07-004. SCE continues to not submit information on demand side management, resource plan, and rate design in its Phase 1 GRC submission for the reasons stated in SCE's 2015 Application (A.13-11-003).

CCAAMA, and fusing mitigation costs within the WMPMA, and authorize those costs to be placed in customer rates;

- 5. Rendering Findings of Fact and Conclusions of Law, and issuing Orders consistent with the materials accompanying this filing; and
- 6. Granting such other relief as the Commission finds to be just and reasonable.

Respectfully submitted,

CLAIRE E. TORCHIA WILLIAM K. BRIGGS KRIS G. VYAS

/s/ William K. Briggs By: William K. Briggs

Attorneys for SOUTHERN CALIFORNIA EDISON COMPANY

> 2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770 Telephone: (626) 302-6735 E-mail: William.Briggs@sce.com

Dated: May 12, 2023

Appendix A

Financial Statements,

Including Income Statement and Balance Sheet

SOUTHERN CALIFORNIA EDISON COMPANY

(h) A balance sheet as of the latest available date, together with an income statement covering the period from close of last year for which an annual report has been filed with the Commission to the date of the balance sheet attached to the application.

STATEMENT OF INCOME THREE MONTHS ENDED MARCH 31, 2023

(In millions)

OPERATING REVENUE	\$ 3,950
OPERATING EXPENSES:	
Purchase power and fuel	1,318
Operation and maintenance	1,081
Wildfire-related claims, net of insurance recoveries	96
Wildfire insurance fund expense	52
Depreciation and amortization	656
Property and other taxes	 139
Total operating expenses	 3,342
OPERATING INCOME	608
Interest expense	(300)
Other income	 120
INCOME BEFORE TAXES	428
Income tax expense	 29
NET INCOME	399
Less: Preference stock dividend requirements	 29
NET INCOME AVAILABLE FOR COMMON STOCK	\$ 370

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET MARCH 31, 2023 ASSETS (in millions)

UTILITY PLANT:	
Utility plant, at original cost	\$ 61,535
Less- accumulated provision for depreciation and amortization	 12,505
	49,030
Construction work in progress	4,801
Nuclear fuel - at amortized cost	 124
	 53,955
OTHER PROPERTY AND INVESTMENTS:	
Nonutility property - less accumulated depreciation of \$95	209
Nuclear decommissioning trusts	4,093
Other investments	 47
	 4,349
CURRENT ASSETS:	
Cash and equivalents	690
Receivables, less allowances of \$323 for uncollectible accounts Accrued unbilled revenue	1,427 766
Inventory	500
Prepaid expenses	333
Regulatory assets	2,817
Wildfire insurance fund contributions	204
Other current assets	315
	 7,052
DEFERRED CHARGES:	
Regulatory assets (Includes \$827 related to VIEs)	8,151
Wildfire insurance fund contributions	2,104
Operating lease right-of-use assets	1,337 133
Long-term insurance receivables Long-term insurance receivables due from affiliate	334
Other long-term assets	1,188
	 13,247
	 ·
	\$ 78,603

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET MARCH 31, 2023 CAPITALIZATION AND LIABILITIES (in millions)

CAPITALIZATION:	
Common stock	2,168
Additional paid-in capital	8,438
Accumulated other comprehensive loss	(8)
Retained earnings	8,264
Common shareholder's equity	18,862
Long-term debt (Includes \$809 related to VIEs)	25,965
Preferred stock	1,945
Total capitalization	46,772
CURRENT LIABILITIES:	
Short-term debt	626
Current portion of long-term debt	2,214
Accounts payable	1,790
Wildfire-related claims	75
Customer deposits	172
Regulatory liabilities	425
Current portion of operating lease liabilities	419
Other current liabilities	1,592
	7,313
DEFERRED CREDITS:	
Deferred income taxes and credits	7,693
Pensions and benefits	103
Asset retirement obligations	2,733
Regulatory liabilities	8,555
Operating lease liabilities	918
Wildfire-related claims	1,600
Other deferred credits and other long-term liabilities	2,916
	24,518

A-3

\$

78,603

Southern California Edison 2021 GRC Summary of Earnings PTYR 2022 (RO Model 6.2) Thousands of Dollars

	Southern California Ediso	on											
	Summary of Earnings												
	2022 GRC Adopted Revenue Requirement Thousands of Dollars												
	I nousands of Dollars												
Line													
No.	Item	Total											
1.	Base Revenues	7,259,220											
2.	Expenses:												
3.	Operation & Maintenance	2,448,763											
4.	Depreciation	2,011,669											
5.	Taxes	663,739											
6.	Revenue Credits	(163,462)											
7.	Total Expenses	4,960,710											
8.	Net Operating Revenue	2,298,511											
9.	Rate Base	29,949,906											
10.	Rate of Return	7.67%											

Southern California Edison 2021 GRC Summary of Earnings PTYR 2023 (RO Model 6.3) Thousands of Dollars

Southern California Edison Summary of Earnings 2023 GRC Adopted Revenue Requirement Thousands of Dollars Line Item Total No 1. Base Revenues 7,792,631 2. Expenses: 2,603,404 2,132,791 3. Operation & Maintenance 4. 5. . Depreciation Taxes 760,326 6. 7. Revenue Credits (164,176) Total Expenses 5,332,345 8. Net Operating Revenue 2,460,286 9. Rate Base 32,052,516 Rate of Return 7.68% 10.

Southern California Edison 2021 GRC Summary of Earnings 2024 PTYR Application (RO Model 7.0) Thousands of Dollars

	Southern California Edis	on											
	Summary of Earnings												
2	2024 GRC Application Revenue Requirement												
	Thousands of Dollars												
Line													
No.	Item	Total											
1.	Base Revenues	8,638,835											
2.	Expenses:												
3.	Operation & Maintenance	3,007,132											
4.	Depreciation	2,304,660											
5.	Taxes	848,780											
6.	Revenue Credits	(165,996)											
7.	Total Expenses	5,994,575											
8.	Net Operating Revenue	2.644.260											
9.	Rate Base	34,444,200											
		. ,,====											
10.	Rate of Return	7.68%											

Appendix B

List of Cities and Counties



INCORPORATED CITIES AND COUNTIES SERVED BY SCE

COUNTIES

Carpinteria

Cathedral City

Carson

Cerritos

Claremont

Chino Chino Hills Goleta

Hanford

Hawthorne

Hemet

Grand Terrace

Hawaiian Gardens

Hermosa Beach

Lancaster

Lawndale

Lindsay

Lomita

Loma Linda

Long Beach

Los Alamitos

Fresno	Kern	Madera	Rive	erside	Tuolumne
Imperial	Kings	Mono	San	Bernardino	Tulare
Inyo	Los Angeles	Orange	San	ta Barbara	Ventura
CITIES					
Adelanto	Commerce	Hesperia	Lynwood	Porterville	Tehachapi
Agoura Hills	Compton	Hidden Hills	Malibu	Rancho Cucamonga	Temecula
Alhambra	Corona	Highland	Mammoth Lakes	Rancho Mirage	Temple City
Aliso Viejo	Costa Mesa	Huntington Beach	Manhattan Beach	Rancho Palos Verdes	Thousand Oaks
Apple Valley	Covina	Huntington Park	Maywood	Rancho Santa Margarita	Torrance
Arcadia	Cudahy	Indian Wells	McFarland	Redlands	Tulare
Artesia	Culver City	Industry	Menifee	Redondo Beach	Tustin
Avalon	Cypress	Inglewood	Mission Viejo	Rialto	Twentynine Palms
Baldwin Park	Delano	Irvine	Monrovia	Ridgecrest	Upland
Barstow	Desert Hot Springs	Inwindale	Montclair	Rolling Hills	Ventura
Beaumont	Diamond Bar	Jurupa Valley	Montebello	Rolling Hills Estates	Victorville
Bell	Downey	La Canada Flintridge	Monterey Park	Rosemead	Villa Park
Bell Gardens	Duarte	La Habra	Moorpark	San Bernardino	Visalia
Bellflower	Eastvale	La Habra Heights	Moreno Valley	San Dimas	Walnut
Beverly Hills	El Monte	La Mirada	Murrieta	San Fernando	West Covina
Bishop	El Segundo	La Palma	Newport Beach	San Gabriel	West Hollywood
Blythe	Exeter	La Puente	Norco	San Jacinto	Westlake Village
Bradbury	Farmersville	La Verne	Norwalk	San Marino	Westminster
Brea	Fillmore	Laguna Beach	Ojai	Santa Ana	Whittier
Buena Park	Fontana	Laguna Hills	Ontario	Santa Barbara	Wildomar
Calabasas	Fountain Valley	Laguna Niguel	Orange	Santa Clarita	Woodlake
California City	Fullerton	Laguna Woods	Oxnard	Santa Fe Springs	(Three Rivers)
Calimesa	Garden Grove	Lake Elsinore	Palm Desert	Santa Monica	Ventura
Camarillo	Gardena	Lake Forest	Palm Springs	Santa Paula	Yorba Linda
Canyon Lake	Glendora	Lakewood	Paimdale	Seal Beach	Yucaipa

Yucca Valley

Updated: 4/25/2019

Palos Verdes Estates

Paramount

Pico Rivera

Placentia

Pomona

Port Hueneme

Perris

Sierra Madre Signal Hill

Simi Valley

South Gate

Stanton

South El Monte

South Pasadena

Appendix C

AB 1054 Certification of Mr. Steven Powell,

President and Chief Executive Officer of Southern California Edison

AB 1054 CERTIFICATION (PUBLIC UTILITIES CODE SECTION 8386.4)

 I am the President and Chief Executive Officer of Southern California Edison Company (SCE).

2. I hereby certify that SCE has not, in a previous proceeding, received authorization from the California Public Utilities Commission (CPUC) to recover the 2025-forward wildfire mitigation plan (WMP)-related costs for activities described in SCE's 2022 WMP Update (approved) and the 2023-2025 WMP (pending approval).

3. In this Test Year 2025 GRC, SCE is seeking CPUC review and authorization of a 2025-2028 revenue requirement; this includes a request to recover, on a forecast basis, costs and activities described in SCE's 2022 WMP Update and 2023-2025 WMP. The Commission has not authorized the recovery of the Test Year 2025 GRC forecast costs in any previous proceedings.

4. Specifically, in Tracks 2-3 of SCE's Test Year 2021 GRC, the Commission reviewed and authorized costs related to incremental wildfire mitigation spend for years 2018-2020. Track 1 of SCE's Test Year 2021 GRC authorized costs on a forecast basis for calendar years 2021-2023. In SCE's 2022 pending Wildfire Mitigation/Vegetation Management (WM/VM) proceeding (A.22-06-003), the Commission is in the process of reviewing SCE's proposed recovery of incremental wildfire mitigation costs for calendar year 2021 (among other costs). In the pending Track 4 of SCE's Test Year 2021 GRC proceeding, the Commission is currently reviewing SCE's proposed 2024 base rates revenue requirement, which includes wildfire mitigation costs. But the cost forecasts set forth in this Application are distinct from the cost recovery requests found in all the previous tracks of SCE's 2021 GRC and the WM/VM proceeding.

5. My certification reflects my belief that SCE's position regarding which costs are eligible for rate recovery is based on SCE's interpretation and understanding of Public Utilities Code Section 8386.4 and information from SCE employees on whom I rely for their knowledge about the details of these issues.

C1

Executed this 12th day of May, 2023 at Rosemead, California.

/s/ Steven Powell

Steven Powell President & CEO SOUTHERN CALIFORNIA EDISON COMPANY

> 8631 Rush Street Post Office Box 800 Rosemead, California 91770

Appendix D

Affordability Metrics

Monthly Essential Usage Bills - Non-CARE

Climate Zone		2023			2	025		2026					2027							20	Total Change over 2023						
clinitic zone	Bill (\$)				E	Bill (\$)		ange (\$)	%	E	Bill (\$)		nge (\$)	%		Bill (\$)	-	nange (\$)	%	-	Bill (\$)	-	ange (\$)	%	Ch	ange (\$)	%
10 hot (Sec 745)	\$	139.6	\$	154.2	\$	14.66	10.5%	\$	157.0	\$	2.80	1.8%	\$	158.6	\$	1.53	1.0%	\$	160.2	\$	1.60	1.0%	\$	20.59	15%		
13 hot	\$	153.4	\$	169.6	\$	16.13	10.5%	\$	172.7	\$	3.08	1.8%	\$	174.3	\$	1.68	1.0%	\$	176.1	\$	1.76	1.0%	\$	22.65	15%		
14 hot	\$	141.3	\$	156.2	\$	14.85	10.5%	\$	159.0	\$	2.84	1.8%	\$	160.6	\$	1.54	1.0%	\$	162.2	\$	1.62	1.0%	\$	20.85	15%		
15 hot	\$	201.4	\$	222.6	\$	21.21	10.5%	\$	226.7	\$	4.05	1.8%	\$	228.9	\$	2.21	1.0%	\$	231.2	\$	2.31	1.0%	\$	29.77	15%		
16 cool	\$	137.2	\$	151.6	\$	14.41	10.5%	\$	154.3	\$	2.75	1.8%	\$	155.8	\$	1.50	1.0%	\$	157.4	\$	1.57	1.0%	\$	20.23	15%		
5 warm	\$	189.3	\$	209.2	\$	19.92	10.5%	\$	213.0	\$	3.81	1.8%	\$	215.1	\$	2.07	1.0%	\$	217.2	\$	2.17	1.0%	\$	27.97	15%		
6 cool	\$	106.5	\$	117.7	\$	11.16	10.5%	\$	119.8	\$	2.13	1.8%	\$	121.0	\$	1.16	1.0%	\$	122.2	\$	1.22	1.0%	\$	15.68	15%		
8 cool	\$	106.6	\$	117.8	\$	11.18	10.5%	\$	119.9	\$	2.14	1.8%	\$	121.1	\$	1.16	1.0%	\$	122.3	\$	1.22	1.0%	\$	15.69	15%		
9 warm	\$	129.7	\$	143.3	\$	13.62	10.5%	\$	145.9	\$	2.60	1.8%	\$	147.3	\$	1.42	1.0%	\$	148.8	\$	1.48	1.0%	\$	19.12	15%		
Average	\$	128.0	\$	141.5	\$	13.44	10.5%	\$	144.0	\$	2.57	1.8%	\$	145.4	\$	1.40	1.0%	\$	146.9	\$	1.46	1.0%	\$	18.88	15%		

Monthly Essential Usage Bills - CARE

																					T	otal Chang	e over	
Climate Zone	:	2023		20	025		2026					2027				2028						2023		
	Bill (\$) Bill (\$) Chai		ange (\$)	%	В	ill (\$)	Change (\$)		%		Bill (\$)	Change (\$)	%		Bill (\$)	(\$) Change (\$)		%	Change		%			
10 hot (Sec 745)	\$	94.7	\$ 104.6	\$	9.94	10.5%	\$	106.5	\$	1.90	1.8%	\$	107.6	\$ 1.03	1.0%	\$	108.6	\$	1.08	1.0%	\$	13.95	15%	
13 hot	\$	104.1	\$ 115.0	\$	10.93	10.5%	\$	117.1	\$	2.09	1.8%	\$	118.3	\$ 1.14	1.0%	\$	119.4	\$	1.19	1.0%	\$	15.35	15%	
14 hot	\$	95.9	\$ 105.9	\$	10.06	10.5%	\$	107.9	\$	1.92	1.8%	\$	108.9	\$ 1.05	1.0%	\$	110.0	\$	1.10	1.0%	\$	14.13	15%	
15 hot	\$	136.6	\$ 151.0	\$	14.37	10.5%	\$	153.7	\$	2.75	1.8%	\$	155.2	\$ 1.50	1.0%	\$	156.8	\$	1.56	1.0%	\$	20.18	15%	
16 cool	\$	93.0	\$ 102.8	\$	9.76	10.5%	\$	104.7	\$	1.87	1.8%	\$	105.7	\$ 1.02	1.0%	\$	106.8	\$	1.06	1.0%	\$	13.71	15%	
5 warm	\$	128.4	\$ 141.9	\$	13.50	10.5%	\$	144.4	\$	2.58	1.8%	\$	145.8	\$ 1.40	1.0%	\$	147.3	\$	1.47	1.0%	\$	18.95	15%	
6 cool	\$	72.3	\$ 79.8	\$	7.57	10.5%	\$	81.3	\$	1.45	1.8%	\$	82.1	\$ 0.79	1.0%	\$	82.9	\$	0.82	1.0%	\$	10.62	15%	
8 cool	\$	72.3	\$ 79.9	\$	7.57	10.5%	\$	81.4	\$	1.45	1.8%	\$	82.2	\$ 0.79	1.0%	\$	83.0	\$	0.82	1.0%	\$	10.64	15%	
9 warm	\$	88.0	\$ 97.2	\$	9.23	10.5%	\$	99.0	\$	1.76	1.8%	\$	100.0	\$ 0.96	1.0%	\$	101.0	\$	1.00	1.0%	\$	12.96	15%	
Average	\$	86.9	\$ 96.0	\$	9.11	10.5%	\$	97.7	\$	1.74	1.8%	\$	98.7	\$ 0.95	1.0%	\$	99.7	\$	0.99	1.0%	\$	12.79	15%	

AR-20 Metric - Non-CARE

	2023	20	25	20)26	20)27	20)28	Total
			Incrementa		Incrementa		Incrementa		Incrementa	Change
	AR-20	AR-20	I Change	AR-20	I Change	AR-20	I Change	AR-20	l Change	Over 2023
Climate Zone			(%)		(%)		(%)		(%)	(%)
	(A)	(B)	(B) - (A)	(C)	(C) - (B)	(D)	(D) - (C)	(E)	(E) - (D)	(E) - (A)
10 hot (Sec 745)	7.5%	7.9%	0.4%	7.7%	-0.2%	7.5%	-0.2%	7.6%	0.1%	0.1%
13 hot	8.4%	9.0%	0.6%	8.9%	-0.1%	8.7%	-0.2%	8.8%	0.1%	0.4%
14 hot	11.8%	12.5%	0.7%	12.3%	-0.2%	12.0%	-0.3%	12.1%	0.1%	0.3%
15 hot	13.1%	13.8%	0.6%	13.5%	-0.3%	13.1%	-0.4%	13.3%	0.1%	0.1%
16 cool	8.3%	8.8%	0.5%	8.6%	-0.1%	8.5%	-0.2%	8.5%	0.1%	0.3%
5 warm	10.9%	11.9%	0.9%	11.8%	-0.1%	11.6%	-0.2%	11.7%	0.1%	0.8%
6 cool	7.5%	8.2%	0.6%	8.1%	-0.1%	8.0%	-0.1%	8.1%	0.1%	0.5%
8 cool	8.6%	9.4%	0.8%	9.3%	-0.1%	9.2%	-0.1%	9.3%	0.1%	0.7%
9 warm	9.1%	10.3%	1.1%	10.3%	0.0%	10.2%	-0.1%	10.3%	0.1%	1.2%
Average	8.7%	9.4%	0.7%	9.3%	-0.1%	9.2%	-0.2%	9.3%	0.1%	0.6%

AR-20 Metric - CARE

	2023	20	25	20)26	20)27	20)28	Total
climate 7	AR-20	AR-20	Incrementa I Change	Over 2023						
Climate Zone	(A)	(B)	(%) (B) - (A)	(C)	(%) (C) - (B)	(D)	(%) (D) - (C)	(E)	(%) (E) - (D)	(%) (E) - (A)
10 hot (Sec 745)	5.1%	5.4%		5.3%	-0.1%			5.2%		
13 hot	5.7%							6.0%		
		6.1%		6.0%	-0.1%					
14 hot	8.0%	8.5%	0.5%	8.3%	-0.1%	8.1%	-0.2%	8.2%	0.1%	0.2%
15 hot	8.9%	9.3%	0.4%	9.2%	-0.2%	8.9%	-0.3%	9.0%	0.1%	0.1%
16 cool	5.6%	6.0%	0.3%	5.9%	-0.1%	5.7%	-0.1%	5.8%	0.1%	0.2%
5 warm	7.4%	8.1%	0.6%	8.0%	-0.1%	7.9%	-0.1%	7.9%	0.1%	0.5%
6 cool	5.1%	5.6%	0.4%	5.5%	0.0%	5.4%	-0.1%	5.5%	0.1%	0.4%
8 cool	5.8%	6.3%	0.5%	6.3%	0.0%	6.2%	-0.1%	6.3%	0.1%	0.5%
9 warm	6.2%	7.0%	0.8%	7.0%	0.0%	7.0%	0.0%	7.0%	0.1%	0.8%
Average	5.9%	6.4%	0.5%	6.3%	-0.1%	6.2%	-0.1%	6.3%	0.1%	0.4%

D2

AR-50 Metric - Non-CARE

	2023	20)25	20)26	20)27	20)28	Total
			Incremental		Incremental		Incremental		Incremental	Change
	AR-50	AR-50	Change	AR-50	Change	AR-50	Change	AR-50	Change	Over 2023
Climate Zone			(%)		(%)		(%)		(%)	(%)
	(A)	(B)	(B) - (A)	(C)	(C) - (B)	(D)	(D) - (C)	(E)	(E) - (D)	(E) - (A)
10 hot (Sec 745)	2.5%	2.6%	0.1%	2.5%	-0.1%	2.5%	-0.1%	2.5%	0.0%	0.0%
13 hot	3.3%	3.5%	0.2%	3.4%	0.0%	3.4%	-0.1%	3.4%	0.0%	0.1%
14 hot	3.4%	3.6%	0.2%	3.5%	-0.1%	3.4%	-0.1%	3.5%	0.0%	0.0%
15 hot	3.7%	3.9%	0.2%	3.8%	-0.1%	3.7%	-0.1%	3.7%	0.0%	0.0%
16 cool	2.8%	2.9%	0.1%	2.9%	0.0%	2.8%	-0.1%	2.8%	0.0%	0.1%
5 warm	2.9%	3.1%	0.2%	3.1%	0.0%	3.0%	-0.1%	3.1%	0.0%	0.1%
6 cool	1.7%	1.8%	0.1%	1.8%	0.0%	1.7%	0.0%	1.7%	0.0%	0.0%
8 cool	1.9%	1.9%	0.1%	1.9%	0.0%	1.9%	0.0%	1.9%	0.0%	0.0%
9 warm	2.2%	2.3%	0.1%	2.2%	0.0%	2.2%	0.0%	2.3%	0.2%	0.2%
Average	2.3%	2.4%	0.1%	2.4%	0.0%	2.3%	-0.1%	2.3%	0.0%	0.0%

AR-50 Metric - CARE

	2023	20)25	20)26	20)27	20)28	Total
			Incremental		Incremental		Incremental		Incremental	
	AR-50	AR-50	Change	AR-50	Change	AR-50	Change	AR-50	Change	Over 2023
Climate Zone			(%)		(%)		(%)		(%)	(%)
	(A)	(B)	(B) - (A)	(C)	(C) - (B)	(D)	(D) - (C)	(E)	(E) - (D)	(E) - (A)
10 hot (Sec 745)	1.7%	1.7%	0.1%	1.7%	0.0%	1.7%	0.0%	1.7%	0.0%	0.0%
13 hot	2.2%	2.3%	0.1%	2.3%	0.0%	2.3%	0.0%	2.3%	0.0%	0.1%
14 hot	2.3%	2.4%	0.1%	2.4%	0.0%	2.3%	-0.1%	2.3%	0.0%	0.0%
15 hot	2.5%	2.6%	0.1%	2.6%	-0.1%	2.5%	-0.1%	2.5%	0.0%	0.0%
16 cool	1.9%	2.0%	0.1%	1.9%	0.0%	1.9%	0.0%	1.9%	0.0%	0.0%
5 warm	2.0%	2.1%	0.1%	2.1%	0.0%	2.1%	0.0%	2.1%	0.0%	0.1%
6 cool	1.2%	1.2%	0.1%	1.2%	0.0%	1.2%	0.0%	1.2%	0.0%	0.0%
8 cool	1.3%	1.3%	0.1%	1.3%	0.0%	1.3%	0.0%	1.3%	0.0%	0.0%
9 warm	1.5%	1.5%	0.1%	1.5%	0.0%	1.5%	0.0%	1.6%	0.1%	0.1%
Average	1.6%	1.6%	0.1%	1.6%	0.0%	1.6%	0.0%	1.6%	0.0%	0.0%

D3

Climate Zone	2023	20	25	20	26	20	27	20	28	Total Change over 2023
			Change		Change		Change		Change	Change
	Hours	Hours	(hours)	Hours	(hours)	Hours	(hours)	Hours	(hours)	(hours)
10 hot (Sec 745)	9.0	10.0	0.9	10.1	0.2	10.2	0.1	10.3	0.1	1.3
13 hot	9.9	10.9	1.0	11.1	0.2	11.2	0.1	11.4	0.1	1.5
14 hot	9.1	10.1	1.0	10.3	0.2	10.4	0.1	10.5	0.1	1.3
15 hot	13.0	14.4	1.4	14.6	0.3	14.8	0.1	14.9	0.1	1.9
16 cool	8.8	9.8	0.9	10.0	0.2	10.1	0.1	10.2	0.1	1.3
5 warm	12.2	13.5	1.3	13.7	0.2	13.9	0.1	14.0	0.1	1.8
6 cool	6.9	7.6	0.7	7.7	0.1	7.8	0.1	7.9	0.1	1.0
8 cool	6.9	7.6	0.7	7.7	0.1	7.8	0.1	7.9	0.1	1.0
9 warm	8.4	9.2	0.9	9.4	0.2	9.5	0.1	9.6	0.1	1.2
Average	8.3	9.1	0.9	9.3	0.2	9.4	0.1	9.5	0.1	1.2

Hours-At-Minimum Wage - Non-CARE

Hours-At-Minimum Wage - CARE

Climate Zone	2023	20	25	20	26	20	27	20	28	Total Change over 2023
			Change		Change		Change		Change	Change
	Hours	Hours	(hours)	Hours	(hours)	Hours	(hours)	Hours	(hours)	(hours)
10 hot (Sec 745)	6.1	6.8	0.6	6.9	0.1	6.9	0.1	7.0	0.1	0.9
13 hot	6.7	7.4	0.7	7.6	0.1	7.6	0.1	7.7	0.1	1.0
14 hot	6.2	6.8	0.6	7.0	0.1	7.0	0.1	7.1	0.1	0.9
15 hot	8.8	9.7	0.9	9.9	0.2	10.0	0.1	10.1	0.1	1.3
16 cool	6.0	6.6	0.6	6.8	0.1	6.8	0.1	6.9	0.1	0.9
5 warm	8.3	9.2	0.9	9.3	0.2	9.4	0.1	9.5	0.1	1.2
6 cool	4.7	5.2	0.5	5.2	0.1	5.3	0.1	5.3	0.1	0.7
8 cool	4.7	5.2	0.5	5.2	0.1	5.3	0.1	5.4	0.1	0.7
9 warm	5.7	6.3	0.6	6.4	0.1	6.4	0.1	6.5	0.1	0.8
Average	5.6	6.2	0.6	6.3	0.1	6.4	0.1	6.4	0.1	0.8

		Climate	Estimated # of						Total
PUMA #	County/City	Zone	Housing Units	2023	2025	2026	2027	2028	Impact
03719	Los Angeles County (Central)Glendale City PUMA	SCE 9	17	25.0%	28.2%	28.3%	28.0%	28.3%	3.3%
	Los Angeles County (South)Long Beach City								
03766	(Southwest & Port) PUMA	SCE 6	39,619	20.3%	22.4%	22.3%	22.0%	22.3%	2.0%
	Los Angeles County (Central)West Hollywood &								
03731	Beverly Hills Cities PUMA	SCE 9	64,887	42.3%	55.0%	56.8%	58.3%	58.9%	16.7%
05904	Orange County (Central)Irvine City (Central) PUMA	SCE 6	13,038	20.3%	23.8%	24.0%	24.1%	24.3%	4.0%
05904	Orange County (Central)Irvine City (Central) PUMA	SCE 8	109,702	20.4%	24.0%	24.2%	24.3%	24.5%	4.1%

AR-20 Metric - Areas of Affordability Concern by PUMA - Non-CARE

AR-20 Metric - Areas of Affordability Concern by PUMA - CARE

		Climate	Estimated # of						Total
PUMA #	County/City	Zone	Housing Units	2023	2025	2026	2027	2028	Impact
03719	Los Angeles County (Central)Glendale City PUMA	SCE 9	17	17.0%	19.2%	19.2%	19.0%	19.2%	2.3%
	Los Angeles County (South)Long Beach City								
03766	(Southwest & Port) PUMA	SCE 6	39,619	13.8%	15.2%	15.1%	15.0%	15.1%	1.3%
	Los Angeles County (Central)West Hollywood &								
03731	Beverly Hills Cities PUMA	SCE 9	64,887	28.7%	37.3%	38.5%	39.6%	40.0%	11.3%
05904	Orange County (Central)Irvine City (Central) PUMA	SCE 6	13,038	13.8%	16.2%	16.3%	16.3%	16.5%	2.7%
05904	Orange County (Central)Irvine City (Central) PUMA	SCE 8	109,702	13.8%	16.3%	16.4%	16.5%	16.6%	2.8%

D5

Non-CARE: Affordability Ratio 20/50 and Hours-at-Minimum Wage

				Afforda	bility Me	etrics - Al	ffordability	Ratio 20 (AR 20) aı	nd Afford	lability R	ate 50 (A	R 50) Im	pacts							
				Cur	rent - Marc	h 1, 2023			Proposed - 2025								Change				
		Average	e Usage			Essential U	Isage		Average Usage Essential Usage							Essential Usage					
			All-		All-		Average Bill Electric	Average Bill Electric		All-		All-		Average Bill Electric	Average Bill Electric	Average	Average	Average Bill Electric	Average Bill Electric		
	Estimated # of		Electric		Electric	Average	Service	Service		Electric		Electric	Average	Service	Service	Bill	Bill	Service	Service		
Climate Zone	Housing Units ₁	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	\$ Change	% Change	AR 20	AR 50		
10 hot (Sec 745)	1,347,156						7.52%	2.47%	1 .		\$ 152.57			7.90%	2.58%	\$ 14.66	10.5%	0.4%	0.1%		
13 hot				\$ 147.83			8.38%	3.25%			\$ 163.37			8.96%	3.46%	\$ 16.13	10.5%	0.6%	0.2%		
14 hot				\$ 136.49			11.78%				\$ 150.82			12.46%	3.56%	\$ 14.85	10.5%	0.7%	0.2%		
15 hot				\$ 203.94			13.12%				\$ 225.41			13.76%		\$ 21.21	10.5%	0.6%	0.2%		
16 cool				\$ 125.45							\$ 138.62			8.77%	2.90%	\$ 14.41	10.5%	0.5%	0.1%		
5 warm	7,859	\$130.27	\$ 129.00	\$ 170.53	\$ 224.12	\$ 189.26	10.94%	2.93%	\$ 143.95	\$142.54	\$ 188.47	\$ 247.72	\$ 209.18	11.87%	3.13%	\$ 19.92	10.5%	0.9%	0.2%		
6 cool	943,130	\$ 148.97	\$ 117.93	\$ 106.22	\$ 107.80	\$ 106.49	7.54%	1.70%	\$ 164.63	\$130.30	\$117.36	\$ 119.10	\$ 117.65	8.18%	1.78%	\$ 11.16	10.5%	0.6%	0.1%		
8 cool	1,246,054										\$117.36			9.35%	1.94%	\$ 11.18	10.5%	0.8%	0.1%		
9 warm	1,160,081	\$ 204.96	\$156.08	\$ 129.87	\$ 127.97	\$ 129.70	9.14%	2.16%	\$ 226.54	\$172.49	\$ 143.50	\$ 141.41	\$ 143.32	10.28%	2.26%	\$ 13.62	10.5%	1.1%	0.1%		

Non-CARE

1Estimated # of Housing Units is based on the 2020 Affordability Ratio Calculator (ARC)

				Afforda	bility Me	etrics - A	ffordability	Ratio 20 (nd Afford	lability Ra	ate 50 (A	R 50) Im	pacts							
				Cur	rent - Marc	h 1, 2023			Proposed - 2026								Change				
		Average	e Usage			Essential U	Isage		Average Usage Essential Usage							Essential Usage					
	Estimated # of		All- Electric		All- Electric	Average	Average Bill Electric Service	Average Bill Electric Service		All- Electric		All- Electric	Average	Average Bill Electric Service	Average Bill Electric Service	Average Bill	Average Bill	Average Bill Electric Service	Average Bill Electric Service		
Climate Zone	Housing Units ₁	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20			% Change	AR 20	AR 50		
10 hot (Sec 745)	1,347,156	\$ 229.92	\$ 184.46	\$ 138.06	\$ 154.45	\$ 139.58	7.52%	2.47%	\$ 258.77	\$ 207.58	\$ 155.34	\$ 173.79	\$ 157.04	7.74%	2.53%	\$ 17.47	12.5%	0.2%	0.1%		
13 hot	166,335	\$ 240.63	\$ 258.74	\$ 147.83	\$ 222.23	\$ 153.45	8.38%	3.25%	\$ 270.83	\$ 291.23	\$ 166.34	\$ 250.11	\$ 172.66	8.87%	3.42%	\$ 19.22	12.5%	0.5%	0.2%		
14 hot	466,812	\$ 226.26	\$ 235.36	\$ 136.49	\$ 192.28	\$ 141.33	11.78%	3.41%	\$ 254.65	\$ 264.89	\$ 153.56	\$ 216.39	\$ 159.02	12.27%	3.50%	\$ 17.69	12.5%	0.5%	0.1%		
15 hot	235,147	\$ 273.70	\$ 220.99	\$ 203.94	\$ 186.29	\$ 201.42	13.12%	3.73%	\$ 308.06	\$248.71	\$ 229.52	\$ 209.64	\$ 226.68	13.50%	3.81%	\$ 25.26	12.5%	0.4%	0.1%		
16 cool	150,603	\$171.74	\$178.20	\$ 125.45	\$ 189.76	\$ 137.15	8.28%	2.76%	\$ 193.26	\$ 200.54	\$ 141.14	\$ 213.55	\$ 154.31	8.65%	2.86%	\$ 17.16	12.5%	0.4%	0.1%		
5 warm	7,859	\$130.27	\$129.00	\$ 170.53	\$ 224.12	\$ 189.26	10.94%	2.93%	\$ 146.56	\$145.13	\$ 191.90	\$ 252.24	\$ 212.99	11.77%	3.10%	\$ 23.73	12.5%	0.8%	0.2%		
6 cool	943,130	\$ 148.97	\$ 117.93	\$ 106.22	\$ 107.80	\$ 106.49	7.54%	1.70%	\$ 167.62	\$132.67	\$ 119.49	\$ 121.26	\$ 119.79	8.12%	1.76%	\$ 13.30	12.5%	0.6%	0.1%		
8 cool	1,246,054	\$ 175.88	\$134.30	\$ 106.22	\$ 109.69	\$ 106.60	8.57%	1.85%	\$ 197.92	\$151.10	\$ 119.49	\$ 123.39	\$ 119.92	9.30%	1.91%	\$ 13.31	12.5%	0.7%	0.1%		
9 warm	1,160,081	\$ 204.96	\$ 156.08	\$ 129.87	\$ 127.97	\$ 129.70	9.14%	2.16%	\$ 230.67	\$175.63	\$ 146.11	\$ 143.98	\$ 145.93	10.30%	2.23%	\$ 16.22	12.5%	1.2%	0.1%		

Non-CARE

1Estimated # of Housing Units is based on the 2020 Affordability Ratio Calculator (ARC)

D8

				Aff	ordabilit	y Metrics	- Affordabi	lity Ratio	20 (AR 20) and Affoi	rdability Ra	te 50 (AR	50) Impact	s					
				Cur	rent - Marc	h 1, 2023					Pro	posed - 2027	1				Cha	nge	
		Average	e Usage			Essential U	Isage		Averag	e Usage		Ess	ential Usage				Essentia	al Usage	
			Average Dill									Average	Average			Average	Average		
							Average Bill	Bill						Bill	Bill			Bill	Bill
			All-	All- Electric Electric										Electric	Electric	Average	Average	Electric	Electric
	Estimated # of	Electric Electric Average Service Service							All-Electric		All-Electric		Service	Service	Bill	Bill	Service	Service	
Climate Zone	Housing Units ₁	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	Basic Bill	Bill	Basic Bill	Bill	Average Bill	AR 20	AR 50	\$ Change	% Change	AR 20	AR 50
10 hot (Sec 745)	1,347,156	\$ 229.92	\$ 184.46	\$ 138.06	\$ 154.45	\$ 139.58	7.52%	2.47%	\$ 261.29	\$ 209.60	\$ 156.85	\$ 175.48	\$ 158.57	7.53%	2.45%	\$ 18.99	13.6%	0.0%	0.0%
13 hot		\$ 240.63					8.38%	3.25%	\$ 273.47	\$ 294.06	\$ 167.96	\$ 252.54	\$ 174.34	8.70%	3.36%	\$ 20.89	13.6%	0.3%	0.1%
14 hot	466,812	\$ 226.26	\$ 235.36	\$ 136.49	\$ 192.28	\$ 141.33	11.78%	3.41%	\$ 257.13	\$ 267.47	\$ 155.05	\$ 218.49	\$ 160.56	11.98%	3.42%	\$ 19.23	13.6%	0.2%	0.0%
15 hot		\$ 273.70					13.12%	3.73%	\$ 311.06	\$ 251.14	\$ 231.75	\$ 211.68	\$ 228.89	13.13%	3.70%	\$ 27.47	13.6%	0.0%	0.0%
16 cool		\$ 171.74					8.28%	2.76%		1 1 1	\$ 142.51			8.45%	2.80%	-	13.6%	0.2%	0.0%
5 warm		\$ 130.27					10.94%	2.93%	\$ 147.99	\$ 146.54	\$ 193.76	\$ 254.69	\$ 215.06	11.58%	3.05%		13.6%	0.6%	0.1%
6 cool		\$ 148.97					7.54%	1.70%	1 11 1		\$ 120.65		\$ 120.95	7.99%			13.6%	0.4%	
8 cool		\$ 175.88					8.57%	1.85%		1	\$ 120.65			9.17%		\$ 14.48	13.6%	0.6%	0.0%
9 warm	1,160,081	\$ 204.96	\$ 156.08	\$ 129.87	\$ 127.97	\$ 129.70	9.14%	2.16%	\$ 232.91	\$ 177.33	\$ 147.53	\$ 145.38	\$ 147.34	10.24%	2.18%	\$ 17.64	13.6%	1.1%	0.0%

Non-CARE

	Affordability Metrics - Affordability Ratio 20 (AR 20) and Affordability Rate 50 (AR 50) Impacts																		
Current - March 1, 2023											Pro	oposed - 20	28				Cha	nge	
	Average Usage Essential Usage							Averag	e Usage		Es	sential Usa	ge			age III Average Bill Bill Electric Service Bill Electric Service 0.59 14.8% 0.1% 0 0.55 14.8% 0.4% 0 0.85 14.8% 0.3% 0 0.77 14.8% 0.3% 0 0.23 14.7% 0.3% 0 9.7 14.8% 0.8% 0 0.23 14.7% 0.3% 0 0.56 14.8% 0.8% 0			
			Average Bill Bill									Bill	Bill			Average	Average		
			All-		All-		Electric	Electric		All-		All-		Electric	Electric	Average	Average	Bill	Bill
	Estimated # of		Electric		Electric	Average	Service	Service		Electric		Electric	Average	Service	Service	Bill		Electric	Electric
Climate Zone	Housing Units ₁	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	\$ Change	% Change	Service	Service
10 hot (Sec 745)				\$ 138.06			7.52%	2.47%			\$ 158.43			7.61%		\$ 20.59	14.8%	0.1%	0.0%
13 hot				\$ 147.83			8.38%				\$ 169.65			8.79%		\$ 22.65	14.8%	0.4%	0.1%
14 hot				\$ 136.49			11.78%				\$ 156.62					\$ 20.85	14.8%	0.3%	0.0%
15 hot				\$ 203.94			13.12%				\$ 234.09					\$ 29.77	14.8%	0.1%	0.0%
16 cool				\$ 125.45							\$ 143.94			8.54%		\$ 20.23	14.7%	0.3%	0.1%
5 warm	1	1		\$ 170.53		1					\$ 195.72			11.70%		\$ 27.97	14.8%	0.8%	0.1%
6 cool				\$ 106.22							\$ 121.86			8.07%		\$ 15.68	14.7%	0.5%	0.0%
8 cool				\$ 106.22							\$ 121.86			9.26%		\$ 15.69	14.7%	0.7%	0.0%
9 warm	1,160,081	\$ 204.96	\$156.08	\$ 129.87	\$ 127.97	\$ 129.70	9.14%	2.16%	\$ 235.26	\$179.12	\$ 149.01	\$ 146.84	\$ 148.83	10.35%	2.20%	\$ 19.12	14.7%	1.2%	0.0%

			Affor	dability N	/letrics - H	lours-at-	Minimum W	/age (HM) Imp	oacts				
							Current - Ma	arch 1, 2023					
		Average	e Usage					Essential Usag	e				
	Estimated # of Housing		All- Electric All-Electric Average State Los Angeles City City Hollywood Pasade										
Climate Zone	Units1	Basic Bill	Bill	Basic Bill	Bill	Bill	(\$15.50/hr.)2		, (\$15.96/hr.)2	, (\$17.50/hr.)2	(\$16.11/hr.)2		
10 hot (Sec 745)	1,347,156	\$ 229.92	\$ 184.46	\$ 138.06	\$ 154.45	\$ 139.58	9.0	-	8.7	-	-		
13 hot	166,335	\$ 240.63	\$ 258.74	\$ 147.83	\$ 222.23	\$ 153.45	9.9	-	-	-	-		
14 hot	466,812	\$ 226.26	\$ 235.36	\$ 136.49	\$ 192.28	\$ 141.33	9.1	-	8.9	-	-		
15 hot	235,147	\$ 273.70	\$ 220.99	\$ 203.94	\$ 186.29	\$ 201.42	13.0	-	-	-	-		
16 cool	150,603	\$ 171.74	\$ 178.20	\$ 125.45	\$ 189.76	\$ 137.15	8.8	8.6	8.6	-	8.5		
5 warm	7,859	\$ 130.27	\$ 129.00	\$ 170.53	\$ 224.12	\$ 189.26	12.2	-	-	-	-		
6 cool	943,130	\$ 148.97	\$ 117.93	\$ 106.22	\$ 107.80	\$ 106.49	6.9	6.6	6.7	-	-		
8 cool	1,246,054	\$ 175.88	\$ 134.30	\$ 106.22	\$ 109.69	\$ 106.60	6.9	6.6	6.7	-	-		
9 warm	1,160,081	\$ 204.96	\$ 156.08	\$ 129.87	\$ 127.97	\$ 129.70	8.4	8.1	8.1	7.4	8.1		

1Estimated # of Housing Units is based on the 2020 Affordability Ratio Calculator (ARC)

₂Minimum Wage values are based on values in effect on January 1, 2023

							Proposed	d - 2025			
		Average	e Usage					Essential Usag	e		
Climate Zone	Estimated # of Housing Units1	Basic Bill	All- Electric Bill	Basic Bill	All-Electric Bill	Average Bill	Average Bill State (\$15.50/hr.)2	Average Bill Los Angeles City (\$16.04/hr.)2	Average Bill Los Angeles Co. Malibu City Santa Monica City (\$15.96/hr.)2	Average Bill West Hollywood (\$17.50/hr.)2	Average Bill Pasadena City (\$16.11/hr.)2
10 hot (Sec 745)	1,347,156	\$ 254.14	\$ 203.87	\$ 152.57	\$ 170.69	\$ 154.24	10.0	-	9.7	-	-
13 hot	166,335	\$ 265.99	\$ 286.01	\$ 163.37	\$ 245.63	\$ 169.58	10.9	-	-	-	-
14 hot	466,812	\$ 250.10	\$ 260.15	\$ 150.82	\$ 212.52	\$ 156.18	10.1	-	9.8	-	-
15 hot	235,147	\$ 302.55	\$ 244.27	\$ 225.41	\$ 205.90	\$ 222.63	14.4	-	-	-	-
16 cool	150,603	\$ 189.81	\$ 196.95	\$ 138.62	\$ 209.73	\$ 151.56	9.8	9.4	9.4	-	9.4
5 warm	7,859	\$ 143.95	\$ 142.54	\$ 188.47	\$ 247.72	\$ 209.18	13.5	-	-	-	-
6 cool	943,130	\$ 164.63	\$ 130.30	\$ 117.36	\$ 119.10	\$ 117.65	7.6	7.3	7.4	-	-
8 cool	1,246,054	\$ 194.38	\$ 148.41	\$ 117.36	\$ 121.19	\$ 117.78	7.6	7.3	7.4	-	-
9 warm	1,160,081	\$ 226.54	\$ 172.49	\$ 143.50	\$ 141.41	\$ 143.32	9.2	8.9	9.0	8.2	8.9

Non-	CAF	RE

	Affordability Metrics - Hours-at-Minimum Wage (HM) Impacts															
			Proposed 2025 Change													
			Essential Usage													
	Estimated # of Housing	Average Bill State Hour	Average Bill State	Average Bill Los Angeles City	Average Bill Los Angeles City	Average Bill Los Angeles Co. Malibu City Santa Monica City	Average Bill Los Angeles Co. Malibu City Santa Monica City	Average Bill West Hollywood Hour	Average Bill West Hollywood	Average Bill Pasadena City	Average Bill Pasadena City					
Climate Zone	Units1	Change	% Change	Hour Change	% Change	Hour Change	% Change	Change	% Change	Hour Change	-					
10 hot (Sec 745)	1,347,156	0.95	10.5%	-	-	0.92	10.5%	-	-	-	-					
13 hot	166,335	1.04	10.5%	-	-	-	-	-	-	-	-					
14 hot	466,812	0.96	10.5%	-	-	0.93	10.5%	-	-	-	-					
15 hot	235,147	1.37	10.5%	-	-	-	-	-	-	-	-					
16 cool	150,603	0.93	10.5%	0.90	10.5%	0.90	10.5%	-	-	0.89	10.5%					
5 warm	7,859	1.29	10.5%	-	-	-	-	-	-	-	-					
6 cool	943,130	0.72	10.5%	0.70	10.5%	0.70	10.5%	-	-	-	-					
8 cool	1,246,054	0.72	10.5%	0.70	10.5%	0.70	10.5%	-	-	-	-					
9 warm	1,160,081	0.88	10.5%	0.85	10.5%	0.85	10.5%	0.78	10.5%	0.85	10.5%					

	Affordability Metrics - Hours-at-Minimum Wage (HM) Impacts														
							Current - Ma	rch 1, 2023							
		Average	e Usage					Essential Usage	e						
Climate Zone	Estimated # of Housing Units1	Basic Bill	All- Electric Bill	Basic Bill	All-Electric Bill	Average Bill	Average Bill State (\$15.50/hr.)2	Average Bill Los Angeles City (\$16.04/hr.)2	Average Bill Los Angeles Co. Malibu City Santa Monica City (\$15.96/hr.)2	Average Bill West Hollywood (\$17.50/hr.)2	Average Bill Pasadena City (\$16.11/hr.)2				
10 hot (Sec 745)	1,347,156	\$ 229.92	\$ 184.46	\$ 138.06	\$ 154.45	\$ 139.58	9.0	-	8.7	-	-				
13 hot	166,335	\$ 240.63	\$ 258.74	\$ 147.83	\$ 222.23	\$ 153.45	9.9	-	-	-	-				
14 hot	466,812	\$ 226.26	\$ 235.36	\$ 136.49	\$ 192.28	\$ 141.33	9.1	-	8.9	-	-				
15 hot	235,147	\$ 273.70	\$ 220.99	\$ 203.94	\$ 186.29	\$ 201.42	13.0	-	-	-	-				
16 cool	150,603	\$ 171.74	\$ 178.20	\$ 125.45	\$ 189.76	\$ 137.15	8.8	8.6	8.6	-	8.5				
5 warm	7,859	\$ 130.27	\$ 129.00	\$ 170.53	\$ 224.12	\$ 189.26	12.2	-	-	-	-				
6 cool	943,130	\$ 148.97	\$ 117.93	\$ 106.22	\$ 107.80	\$ 106.49	6.9	6.6	6.7	-	-				
8 cool	1,246,054	\$ 175.88	\$ 134.30	\$ 106.22	\$ 109.69	\$ 106.60	6.9	6.6	6.7	-	-				
9 warm	1,160,081	\$ 204.96	\$ 156.08	\$ 129.87	\$ 127.97	\$ 129.70	8.4	8.1	8.1	7.4	8.1				

1Estimated # of Housing Units is based on the 2020 Affordability Ratio Calculator (ARC)

₂Minimum Wage values are based on values in effect on January 1, 2023

							Proposed	d - 2026			
		Average	e Usage					Essential Usag	e		
Climate Zone	Estimated # of Housing Units1	Basic Bill	All- Electric Bill	Basic Bill	All-Electric Bill	Average Bill	Average Bill State (\$15.50/hr.)2	Average Bill Los Angeles City (\$16.04/hr.)2	Average Bill Los Angeles Co. Malibu City Santa Monica City (\$15.96/hr.)2	Average Bill West Hollywood (\$17.50/hr.)2	Average Bill Pasadena City (\$16.11/hr.)2
10 hot (Sec 745)	1,347,156	\$ 258.77	\$ 207.58	\$ 155.34	\$ 173.79	\$ 157.04	10.1	-	9.8	-	-
13 hot	166,335	\$ 270.83	\$ 291.23	\$ 166.34	\$ 250.11	\$ 172.66	11.1	-	-	-	-
14 hot	466,812	\$ 254.65	\$ 264.89	\$ 153.56	\$ 216.39	\$ 159.02	10.3	-	10.0	-	-
15 hot	235,147	\$ 308.06	\$ 248.71	\$ 229.52	\$ 209.64	\$ 226.68	14.6	-	-	-	-
16 cool	150,603	\$ 193.26	\$ 200.54	\$ 141.14	\$ 213.55	\$ 154.31	10.0	9.6	9.6	-	9.6
5 warm	7,859	\$ 146.56	\$ 145.13	\$ 191.90	\$ 252.24	\$ 212.99	13.7	-	-	-	-
6 cool	943,130	\$ 167.62	\$ 132.67	\$ 119.49	\$ 121.26	\$ 119.79	7.7	7.5	7.5	-	-
8 cool	1,246,054	\$ 197.92	\$ 151.10	\$ 119.49	\$ 123.39	\$ 119.92	7.7	7.5	7.5	-	-
9 warm	1,160,081	\$ 230.67	\$ 175.63	\$ 146.11	\$ 143.98	\$ 145.93	9.4	9.1	9.1	8.3	9.1

Non-	CARE

	Affordability Metrics - Hours-at-Minimum Wage (HM) Impacts															
			Proposed 2026 Change													
			Essential Usage													
	Estimated # of Housing	Average Bill State Hour	Average Bill State	Average Bill Los Angeles City	Average Bill Los Angeles City	Average Bill Los Angeles Co. Malibu City Santa Monica City	Average Bill Los Angeles Co. Malibu City Santa Monica City	Average Bill West Hollywood Hour	Average Bill West Hollywood	Average Bill Pasadena City	Average Bill Pasadena City					
Climate Zone	Units1	Change	% Change	, Hour Change	% Change	Hour Change	% Change	Change	, % Change	, Hour Change	-					
10 hot (Sec 745)	1,347,156	1.13	12.5%	-	-	1.09	12.5%	-	-	-	-					
13 hot	166,335	1.24	12.5%	-	-	-	-	-	-	-	-					
14 hot	466,812	1.14	12.5%	-	-	1.11	12.5%	-	-	-	-					
15 hot	235,147	1.63	12.5%	-	-	-	-	-	-	-	-					
16 cool	150,603	1.11	12.5%	1.07	12.5%	1.07	12.5%	-	-	1.07	12.5%					
5 warm	7,859	1.53	12.5%	-	-	-	-	-	-	-	-					
6 cool	943,130	0.86	12.5%	0.83	12.5%	0.83	12.5%	-	-	-	-					
8 cool	1,246,054	0.86	12.5%	0.83	12.5%	0.83	12.5%	-	-	-	-					
9 warm	1,160,081	1.05	12.5%	1.01	12.5%	1.02	12.5%	0.93	12.5%	1.01	12.5%					

	Affordability Metrics - Hours-at-Minimum Wage (HM) Impacts											
							Current - Ma	rch 1, 2023				
		Average	e Usage	Essential Usage								
Climate Zone	Estimated # of Housing Units1	Basic Bill	All- Electric Bill	Basic Bill	All-Electric Bill	Average Bill	Average Bill State (\$15.50/hr.)2	Average Bill Los Angeles City (\$16.04/hr.)2	Average Bill Los Angeles Co. Malibu City Santa Monica City (\$15.96/hr.)2	Average Bill West Hollywood (\$17.50/hr.)2	Average Bill Pasadena City (\$16.11/hr.)2	
10 hot (Sec 745)	1,347,156	\$ 229.92	\$ 184.46	\$ 138.06	\$ 154.45	\$ 139.58	9.0	-	8.7	-	-	
13 hot	166,335	\$ 240.63	\$ 258.74	\$ 147.83	\$ 222.23	\$ 153.45	9.9	-	-	-	-	
14 hot	466,812	\$ 226.26	\$ 235.36	\$ 136.49	\$ 192.28	\$ 141.33	9.1	-	8.9	-	-	
15 hot	235,147	\$ 273.70	\$ 220.99	\$ 203.94	\$ 186.29	\$ 201.42	13.0	-	-	-	-	
16 cool	150,603	\$ 171.74	\$ 178.20	\$ 125.45	\$ 189.76	\$ 137.15	8.8	8.6	8.6	-	8.5	
5 warm	7,859	\$ 130.27	\$ 129.00	\$ 170.53	\$ 224.12	\$ 189.26	12.2	-	-	-	-	
6 cool	943,130	\$ 148.97	\$ 117.93	\$ 106.22	\$ 107.80	\$ 106.49	6.9	6.6	6.7	-	-	
8 cool	1,246,054	\$ 175.88	\$ 134.30	\$ 106.22	\$ 109.69	\$ 106.60	6.9	6.6	6.7	-	-	
9 warm	1,160,081	\$ 204.96	\$ 156.08	\$ 129.87	\$ 127.97	\$ 129.70	8.4	8.1	8.1	7.4	8.1	

1Estimated # of Housing Units is based on the 2020 Affordability Ratio Calculator (ARC)

₂Minimum Wage values are based on values in effect on January 1, 2023

							Proposed	d - 2027					
		Average	e Usage		Essential Usage								
Climate Zone	Estimated # of Housing Units1	Basic Bill	All- Electric Bill	Basic Bill	All-Electric Bill	Average Bill	Average Bill State (\$15.50/hr.)2	Average Bill Los Angeles City (\$16.04/hr.)2	Average Bill Los Angeles Co. Malibu City Santa Monica City (\$15.96/hr.)2	Average Bill West Hollywood (\$17.50/hr.)2	Average Bill Pasadena City (\$16.11/hr.)2		
10 hot (Sec 745)	1,347,156	\$ 261.29	\$ 209.60	\$ 156.85	\$ 175.48	\$ 158.57	10.2	-	9.9	-	-		
13 hot	166,335	\$ 273.47	\$ 294.06	\$ 167.96	\$ 252.54	\$ 174.34	11.2	-	-	-	-		
14 hot	466,812	\$ 257.13	\$ 267.47	\$ 155.05	\$ 218.49	\$ 160.56	10.4	-	10.1	-	-		
15 hot	235,147	\$ 311.06	\$ 251.14	\$ 231.75	\$ 211.68	\$ 228.89	14.8	-	-	-	-		
16 cool	150,603	\$ 195.14	\$ 202.49	\$ 142.51	\$ 215.63	\$ 155.81	10.1	9.7	9.7	-	9.7		
5 warm	7,859	\$ 147.99	\$ 146.54	\$ 193.76	\$ 254.69	\$ 215.06	13.9	-	-	-	-		
6 cool	943,130	\$ 169.25	\$ 133.95	\$ 120.65	\$ 122.44	\$ 120.95	7.8	7.5	7.6	-	-		
8 cool	1,246,054	\$ 199.84	\$ 152.57	\$ 120.65	\$ 124.59	\$ 121.08	7.8	7.5	7.6	-	-		
9 warm	1,160,081	\$ 232.91	\$ 177.33	\$ 147.53	\$ 145.38	\$ 147.34	9.5	9.2	9.2	8.4	9.1		

Non-	CARE

	Affordability Metrics - Hours-at-Minimum Wage (HM) Impacts											
						Proposed 2	027 Change					
Essential Usage												
	Estimated #		State Bill Los Angeles Los Angeles Santa Monica Santa Monica Hollywood West Pasadena								Average Bill Pasadena	
	of Housing	Hour	State	City	City	City	City	Hour	Hollywood	City	City	
Climate Zone	Units1	Change	% Change	Hour Change	% Change	Hour Change	% Change	Change	% Change	Hour Change	% Change	
10 hot (Sec 745)	1,347,156	1.23	13.6%	-	-	1.19	13.6%	-	-	-	-	
13 hot	166,335	1.35	13.6%	-	-	-	-	-	-	-	-	
14 hot	466,812	1.24	13.6%	-	-	1.21	13.6%	-	-	-	-	
15 hot	235,147	1.77	13.6%	-	-	-	-	-	-	-	-	
16 cool	150,603	1.20	13.6%	1.16	13.6%	1.16	13.6%	-	-	1.16	13.6%	
5 warm	7,859	1.66	13.6%	-	-	-	-	-	-	-	-	
6 cool	943,130	0.93	13.6%	0.90	13.6%	0.91	13.6%	-	-	-	-	
8 cool	1,246,054	0.93	13.6%	0.90	13.6%	0.91	13.6%	-	-	-	-	
9 warm	1,160,081	1.14	13.6%	1.10	13.6%	1.11	13.6%	1.01	13.6%	1.09	13.6%	

	Affordability Metrics - Hours-at-Minimum Wage (HM) Impacts												
					Current - March 1, 2023								
		Average	e Usage	age Essential Usage									
Climate Zone	Estimated # of Housing Units1	Basic Bill	All- Electric Bill	Basic Bill	All-Electric Bill	Average Bill	Average Bill State (\$15.50/hr.)2	Average Bill Los Angeles City (\$16.04/hr.)2	Average Bill Los Angeles Co. Malibu City Santa Monica City (\$15.96/hr.)2	Average Bill West Hollywood (\$17.50/hr.)2	Average Bill Pasadena City (\$16.11/hr.)2		
10 hot (Sec 745)	1,347,156		\$ 184.46	\$ 138.06	\$ 154.45	\$ 139.58	9.0	-	8.7	-	-		
13 hot	166,335	\$ 240.63	\$ 258.74	\$ 147.83	\$ 222.23		9.9	-	-	-	-		
14 hot	466,812	\$ 226.26	\$ 235.36	\$ 136.49	\$ 192.28	\$ 141.33	9.1	-	8.9	-	-		
15 hot	235,147	\$ 273.70	\$ 220.99	\$ 203.94	\$ 186.29	\$ 201.42	13.0	-	-	-	-		
16 cool	150,603	\$ 171.74	\$ 178.20	\$ 125.45	\$ 189.76	\$ 137.15	8.8	8.6	8.6	-	8.5		
5 warm	7,859	\$ 130.27	\$ 129.00	\$ 170.53	\$ 224.12	\$ 189.26	12.2	-	-	-	-		
6 cool	943,130	\$ 148.97	\$ 117.93	\$ 106.22	\$ 107.80	\$ 106.49	6.9	6.6	6.7	-	-		
8 cool	1,246,054	\$ 175.88	\$ 134.30	\$ 106.22	\$ 109.69	\$ 106.60	6.9	6.6	6.7	-	-		
9 warm	1,160,081	\$ 204.96	\$ 156.08	\$ 129.87	\$ 127.97	\$ 129.70	8.4	8.1	8.1	7.4	8.1		

 $_{\rm 1} {\rm Estimated}$ # of Housing Units is based on the 2020 Affordability Ratio Calculator (ARC)

₂Minimum Wage values are based on values in effect on January 1, 2023

							Proposed	d - 2028					
		Average	e Usage		Essential Usage								
	Estimated #		All- Electric		All-Electric	Average	Average Bill State	Average Bill Los Angeles City	Average Bill Los Angeles Co. Malibu City Santa Monica City	Average Bill West Hollywood	Average Bill Pasadena City		
Climate Zone	Units1	Basic Bill	Bill	Basic Bill	Bill	Bill	(\$15.50/hr.)2	(\$16.04/hr.)2	(\$15.96/hr.)2	(\$17.50/hr.)2	(\$16.11/hr.)2		
10 hot (Sec 745)	1,347,156	\$ 263.93	\$ 211.71	\$ 158.43	\$ 177.25	\$ 160.17	10.3	-	10.0	-	-		
13 hot	166,335	\$ 276.23	\$ 297.03	\$ 169.65	\$ 255.09	\$ 176.10	11.4	-	-	-	-		
14 hot	466,812	\$ 259.73	\$ 270.17	\$ 156.62	\$ 220.70	\$ 162.18	10.5	-	10.2	-	-		
15 hot	235,147	\$ 314.20	\$ 253.67	\$ 234.09	\$ 213.82	\$ 231.20	14.9	-	-	-	-		
16 cool	150,603	\$ 197.11	\$ 204.53	\$ 143.94	\$ 217.80	\$ 157.38	10.2	9.8	9.8	-	9.8		
5 warm	7,859	\$ 149.48	\$ 148.01	\$ 195.72	\$ 257.26	\$ 217.23	14.0	-	-	-	-		
6 cool	943,130	\$ 170.95	\$ 135.30	\$ 121.86	\$ 123.67	\$ 122.17	7.9	7.6	7.7	-	-		
8 cool	1,246,054	\$ 201.86	\$ 154.11	\$ 121.86	\$ 125.84	\$ 122.29	7.9	7.6	7.7	-	-		
9 warm	1,160,081	\$ 235.26	\$ 179.12	\$ 149.01	\$ 146.84	\$ 148.83	9.6	9.3	9.3	8.5	9.2		

Non-	CARE
11011	

	Affordability Metrics - Hours-at-Minimum Wage (HM) Impacts												
						Proposed 2	028 Change						
			al Usage										
						Average Bill	Average Bill						
						Los Angeles	Los Angeles						
						Co.	Co.	Average Bill					
		Average Bill	Average	Average Bill	Average Bill	Malibu City	Malibu City	West	Average Bill	Average Bill	Average Bill		
	Estimated #	State	Bill	Los Angeles	Los Angeles	Santa Monica	Santa Monica	Hollywood	West	Pasadena	Pasadena		
	of Housing	Hour	State	City	City	City	City	Hour	Hollywood	City	City		
Climate Zone	Units1	Change	% Change	Hour Change	% Change	Hour Change	% Change	Change	% Change	Hour Change	% Change		
10 hot (Sec 745)	1,347,156	1.33	14.8%	-	-	1.29	14.8%	-	-	-	-		
13 hot	166,335	1.46	14.8%	-	-	-	-	-	-	-	-		
14 hot	466,812	1.35	14.8%	-	-	1.31	14.8%	-	-	-	-		
15 hot	235,147	1.92	14.8%	-	-	-	-	-	-	-	-		
16 cool	150,603	1.31	14.7%	1.26	14.7%	1.26	14.7%	-	-	1.26	14.7%		
5 warm	7,859	1.80	14.8%	-	-	-	-	-	-	-	-		
6 cool	943,130	1.01	14.7%	0.98	14.7%	0.98	14.7%	-	-	-	-		
8 cool	1,246,054	1.01	14.7%	0.98	14.7%	0.98	14.7%	-	-	-	-		
9 warm	1,160,081	1.23	14.7%	1.19	14.7%	1.20	14.7%	1.09	14.7%	1.19	14.7%		

		Affordabilit	y Metrics - A	reas of Affordab	oility Concern	
PUMA	County/City	Electric Climate Zone	Estimated # of Housing Units1	Current - March 1, 2023 Electric Service AR 20	Proposed - 2025 Electric Service AR 20	Incremental Change Electric Service AR 20
	Los Angeles County (Central)Glendale					
03719	,	SCE 9	17	25.00%	28.24%	3.24%
	Los Angeles County (South)Long Beach City (Southwest & Port)					
03766		SCE 6	39,619	20.29%	22.41%	2.12%
	Los Angeles County (Central)West Hollywood & Beverly Hills Cities					
03731		SCE 9	64,887	42.26%	55.02%	12.76%
	Orange County (Central)Irvine City (Central)					
05904		SCE 6	13,038	20.27%	23.82%	3.55%
	Orange County (Central)Irvine City (Central)					
05904	PUMA	SCE 8	109,702	20.40%	24.01%	3.61%

		Affordabilit	y Metrics - A	reas of Affordat	oility Concern	
PUMA	County/City	Electric Climate Zone	Estimated # of Housing Units1	Current - March 1, 2023 Electric Service AR 20	Proposed - 2026 Electric Service AR 20	Incremental Change Electric Service AR 20
	Los Angeles County (Central)Glendale					
03719	City PUMA	SCE 9	17	25.00%	28.26%	3.25%
	Los Angeles County (South)Long Beach City (Southwest & Port)					
03766	PUMA	SCE 6	39,619	20.29%	22.32%	2.02%
	Los Angeles County (Central)West Hollywood & Beverly Hills Cities					
03731	PUMA	SCE 9	64,887	42.26%	56.80%	14.54%
	Orange County (Central)Irvine City (Central)					
05904	PUMA	SCE 6	13,038	20.27%	24.03%	3.76%
	Orange County (Central)Irvine City (Central)					
05904	PUMA	SCE 8	109,702	20.40%	24.23%	3.83%

		Affordabilit	y Metrics - A	reas of Affordat	oility Concern	
PUMA	County/City	Electric Climate Zone	Estimated # of Housing Units1	Current - March 1, 2023 Electric Service AR 20	Proposed - 2027 Electric Service AR 20	Incremental Change Electric Service AR 20
	Los Angeles County					
	(Central)Glendale					
03719		SCE 9	17	25.00%	28.04%	3.04%
	Los Angeles County					
	(South)Long					
	Beach City					
	(Southwest & Port)					
03766	PUMA	SCE 6	39,619	20.29%	22.05%	1.75%
	Los Angeles County					
	(Central)West					
	Hollywood &					
	Beverly Hills Cities					
03731	PUMA	SCE 9	64,887	42.26%	58.35%	16.08%
	Orange County					
	(Central)Irvine					
	City (Central)					
05904	PUMA	SCE 6	13,038	20.27%	24.06%	3.79%
	Orange County					
	(Central)Irvine					
	City (Central)					
05904	PUMA	SCE 8	109,702	20.40%	24.26%	3.86%

		Affordabilit	y Metrics - A	reas of Affordab	oility Concern	
PUMA	County/City	Electric Climate Zone	Estimated # of Housing Units1	Current - March 1, 2023 Electric Service AR 20	Proposed - 2028 Electric Service AR 20	Incremental Change Electric Service AR 20
	Los Angeles County					
	(Central)Glendale					
03719		SCE 9	17	25.00%	28.32%	3.32%
	Los Angeles County					
	(South)Long					
	Beach City					
	(Southwest & Port)					
03766	PUMA	SCE 6	39,619	20.29%	22.27%	1.98%
	Los Angeles County					
	(Central)West					
	Hollywood &					
	Beverly Hills Cities					
03731	PUMA	SCE 9	64,887	42.26%	58.93%	16.67%
	Orange County					
	(Central)Irvine					
	City (Central)					
05904		SCE 6	13,038	20.27%	24.31%	4.03%
	Orange County					
	(Central)Irvine					
	City (Central)					
05904	PUMA	SCE 8	109,702	20.40%	24.51%	4.11%

CARE: Affordability Ratio 20/50 and Hours-at-Minimum Wage

	Affordability Metrics - Affordability Ratio 20 (AR 20) and Affordability Rate 50 (AR 50) Impacts																			
				Afforda	bility Me	etrics - A	ffordability	Ratio 20 (AR 20) ai	nd Afford	lability R	ate 50 (A	R 50) Im	pacts						
				Cur	rent - Marc	h 1, 2023					Pr	oposed - 20	25				Change			
		Average	e Usage			Essential Usage			Averag	e Usage		Es	sential Usa	ge			Essentia	I Usage		
			All-		All-		Average Bill Electric	Bill Electric		All-		All-		Bill Electric	Bill Electric	Average	Average	Average Bill	Average Bill	
	Estimated # of		Electric		Electric	Average	Service	Service		Electric		Electric	Average	Service	Service	Bill	Bill	Electric	Electric	
Climate Zone	Housing Units ₁	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	\$ Change	% Change	Service	Service	
10 hot (Sec 745)	1,347,156	\$ 151.12	\$ 110.59	\$ 93.66	\$ 104.77	\$ 94.69	5.10%	1.67%	\$ 167.03	\$122.21	\$ 103.49	\$ 115.78	\$ 104.63	5.36%	1.75%	\$ 9.94	10.5%	0.3%	0.1%	
13 hot	166,335	\$ 153.46	\$ 153.97	\$ 100.29	\$ 150.70	\$ 104.09	5.68%	2.21%	\$ 169.62	\$170.18	\$ 110.82	\$ 166.57	\$ 115.02	6.08%	2.34%	\$ 10.93	10.5%	0.4%	0.1%	
14 hot		\$ 149.30										\$ 144.13		8.45%	2.42%	\$ 10.06	10.5%	0.5%	0.1%	
15 hot		\$ 179.12						2.53%	\$ 197.99	\$171.45	\$ 152.87	\$ 139.64	\$ 150.98	9.33%	2.64%	\$ 14.37	10.5%	0.4%	0.1%	
16 cool	150,603	\$ 138.09	\$ 136.16	\$ 85.12	\$ 128.70	\$ 93.05	5.61%	1.87%	\$ 152.62	\$150.49	\$ 94.04	\$142.24	\$ 102.81	5.95%	1.97%	\$ 9.76	10.5%	0.3%	0.1%	
5 warm	7,859	\$ 84.96	\$115.54	\$ 115.67	\$ 151.99	\$ 128.36	7.42%	1.99%	\$ 93.87	\$127.69	\$ 127.83	\$ 167.99	\$ 141.86	8.05%	2.12%	\$ 13.50	10.5%	0.6%	0.1%	
6 cool	943,130	\$ 85.23	\$ 83.68	\$ 72.09	\$ 73.15	\$ 72.27	5.12%	1.15%	\$ 94.17	\$ 92.45	\$ 79.63	\$ 80.81	\$ 79.83	5.55%	1.21%	\$ 7.57	10.5%	0.4%	0.1%	
8 cool	1,246,054	\$ 99.71	\$ 87.87	\$ 72.09	\$ 74.44	\$ 72.34	5.81%	1.26%	\$ 110.17	\$ 97.09	\$ 79.63	\$ 82.23	\$ 79.92	6.35%	1.32%	\$ 7.57	10.5%	0.5%	0.1%	
9 warm	1,160,081	\$ 119.28	\$ 91.34	\$ 88.11	\$ 86.83	\$ 88.00	6.20%	1.46%	\$ 131.82	\$100.92	\$ 97.35	\$ 95.93	\$ 97.23	6.97%	1.53%	\$ 9.23	10.5%	0.8%	0.1%	

1Estimated # of Housing Units is based on the 2020 Affordability Ratio Calculator (ARC)

	CARE																		
				Afforda	bility Me	etrics - A	ffordability	Ratio 20 (AR 20) aı	nd Afford	lability R	ate 50 (A	R 50) Im	pacts					
				Cur	rent - Marc	h 1, 2023					Pr	oposed - 20)26				Cha	ange	
		Average	e Usage			Essential L					ige		Essential Usage						
	А						Average Bill	Bill						Bill	Bill			Average	Average
			All-		All-		Electric	Electric		All-		All-		Electric	Electric	Average	Average	Bill	Bill
	Estimated # of		Electric		Electric	Average	Service	Service		Electric		Electric	Average	Service	Service	Bill	Bill	Electric	Electric
Climate Zone	Housing Units ₁	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	\$ Change	% Change	Service	Service
10 hot (Sec 745)	1,347,156	\$ 151.12	\$ 110.59	\$ 93.66	\$ 104.77	\$ 94.69	5.10%	1.67%	\$ 170.07	\$124.43	\$ 105.37	\$ 117.88	\$ 106.53	5.25%	1.71%	\$ 11.84	12.5%	0.2%	0.0%
13 hot	166,335	\$ 153.46	\$ 153.97	\$ 100.29	\$ 150.70	\$ 104.09	5.68%	2.21%	\$ 172.71	\$173.28	\$ 112.83	\$ 169.60	\$ 117.11	6.01%	2.32%	\$ 13.02	12.5%	0.3%	0.1%
14 hot	466,812	\$ 149.30	\$ 155.68	\$ 92.59	\$ 130.41	\$ 95.88	7.99%	2.31%	\$ 168.02	\$175.20	\$ 104.17	\$ 146.75	\$ 107.86	8.32%	2.38%	\$ 11.99	12.5%	0.3%	0.1%
15 hot	235,147	\$179.12	\$ 155.12	\$ 138.31	\$ 126.35	\$ 136.60	8.90%	2.53%	\$ 201.60	\$174.57	\$ 155.65	\$ 142.18	\$ 153.72	9.15%	2.58%	\$ 17.12	12.5%	0.3%	0.1%
16 cool	150,603	\$ 138.09	\$ 136.16	\$ 85.12	\$ 128.70	\$ 93.05	5.61%	1.87%	\$ 155.40	\$153.22	\$ 95.75	\$ 144.82	\$ 104.68	5.87%	1.94%	\$ 11.63	12.5%	0.3%	0.1%
5 warm	7,859	\$ 84.96	\$ 115.54	\$ 115.67	\$ 151.99	\$ 128.36	7.42%	1.99%	\$ 95.57	\$130.01	\$ 130.15	\$171.04	\$ 144.44	7.98%	2.10%	\$ 16.08	12.5%	0.6%	0.1%
6 cool	943,130	\$ 85.23	\$ 83.68	\$ 72.09	\$ 73.15	\$ 72.27	5.12%	1.15%	\$ 95.88	\$ 94.13	\$ 81.08	\$ 82.28	\$ 81.28	5.51%	1.20%	\$ 9.01	12.5%	0.4%	0.0%
8 cool	1,246,054	\$ 99.71	\$ 87.87	\$ 72.09	\$ 74.44	\$ 72.34	5.81%	1.26%	\$ 112.18	\$ 98.85	\$ 81.08	\$ 83.72	\$ 81.36	6.31%	1.30%	\$ 9.02	12.5%	0.5%	0.0%
9 warm	1,160,081	\$ 119.28	\$ 91.34	\$ 88.11	\$ 86.83	\$ 88.00	6.20%	1.46%	\$ 134.22	\$102.76	\$ 99.12	\$ 97.67	\$ 98.99	6.99%	1.51%	\$ 11.00	12.5%	0.8%	0.0%

				Aff	ordabilit	Metrics	- Affordabi	lity Ratio	20 (AR 20) and Affoi	dability Ra	te 50 (AR	50) Impact	s					
				Cur	rent - Marc	h 1, 2023					Pro	posed - 2027	1				Cha	ange	
		Average	e Usage			Essential U	sage		Averag	ge Usage		Ess	ential Usage			Essential Usage			
							Average Bill	Bill						Bill	Bill			Average	Average
							Electric						Electric	Electric	Average	Average	Bill	Bill	
	Estimated # of		Electric		Electric	Average	Service	Service		All-Electric		All-Electric		Service	Service	Bill	Bill	Electric	Electric
Climate Zone	Housing Units ₁	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	Basic Bill	Bill	Basic Bill	Bill	Average Bill	AR 20	AR 50	\$ Change	% Change	Service	Service
10 hot (Sec 745)	1,347,156						5.10%	1.67%	\$ 171.73	\$ 125.64	\$ 106.39	\$ 119.03	\$ 107.56	5.11%	1.66%	\$ 12.87	13.6%	0.0%	0.0%
13 hot	166,335	\$ 153.46	\$ 153.97	\$ 100.29	\$ 150.70	\$ 104.09	5.68%	2.21%	\$ 174.39	\$ 174.96	\$ 113.92	\$ 171.25	\$ 118.25	5.90%	2.28%	\$ 14.16	13.6%	0.2%	0.1%
14 hot	466,812	\$ 149.30	\$ 155.68	\$ 92.59	\$ 130.41	\$ 95.88	7.99%	2.31%	\$ 169.65	\$ 176.90	\$ 105.18	\$ 148.17	\$ 108.91	8.13%	2.32%	\$ 13.03	13.6%	0.1%	0.0%
15 hot	235,147	\$ 179.12	\$ 155.12	\$ 138.31	\$ 126.35	\$ 136.60	8.90%	2.53%	\$ 203.56	\$ 176.27	\$ 157.16	\$ 143.56	\$ 155.22	8.90%	2.51%	\$ 18.61	13.6%	0.0%	0.0%
16 cool	150,603	\$ 138.09	\$ 136.16	\$ 85.12	\$ 128.70	\$ 93.05	5.61%	1.87%	\$ 156.91	\$ 154.71	\$ 96.68	\$ 146.23	\$ 105.69	5.73%	1.90%	\$ 12.65	13.6%	0.1%	0.0%
5 warm	7,859	\$ 84.96	\$ 115.54	\$ 115.67	\$ 151.99	\$ 128.36	7.42%	1.99%	\$ 96.50	\$ 131.27	\$ 131.41	\$ 172.71	\$ 145.85	7.85%	2.07%	\$ 17.49	13.6%	0.4%	0.1%
6 cool	943,130	\$ 85.23	\$ 83.68	\$ 72.09	\$ 73.15	\$ 72.27	5.12%	1.15%	\$ 96.80	\$ 95.04	\$ 81.86	\$ 83.08	\$ 82.07	5.42%	1.17%	\$ 9.80	13.6%	0.3%	0.0%
8 cool	1,246,054	\$ 99.71	\$ 87.87	\$ 72.09	\$ 74.44	\$ 72.34	5.81%	1.26%	\$ 113.26	\$ 99.81	\$ 81.86	\$ 84.53	\$ 82.15	6.22%	1.27%	\$ 9.81	13.6%	0.4%	0.0%
9 warm	1,160,081	\$ 119.28	\$ 91.34	\$ 88.11	\$ 86.83	\$ 88.00	6.20%	1.46%	\$ 135.52	\$ 103.75	\$ 100.08	\$ 98.62	\$ 99.95	6.95%	1.48%	\$ 11.96	13.6%	0.8%	0.0%

1Estimated # of Housing Units is based on the 2020 Affordability Ratio Calculator (ARC)

6																			
	Affordability Metrics - Affordability Ratio 20 (AR 20) and Affordability Rate 50 (AR 50) Impacts Current - March 1, 2023 Proposed - 2028 Change																		
				Cur	rent - Marc	h 1, 2023					Pro	oposed - 20	28				Cha	nge	
		Average	e Usage			Essential L	Jsage		Averag	e Usage		Es	sential Usa	ge			Essentia	al Usage	
							Average Bill	Bill						Bill	Bill			Average	Average
			All-		All-		Electric	Electric		All-		All-		Electric	Electric	Average	Average	Bill	Bill
	Estimated # of		Electric		Electric	Average	Service	Service		Electric		Electric	Average	Service	Service	Bill	Bill	Electric	Electric
Climate Zone	Housing Units ₁	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	Basic Bill	Bill	Basic Bill	Bill	Bill	AR 20	AR 50	\$ Change	% Change	Service	Service
10 hot (Sec 745)	1,347,156	\$ 151.12	\$ 110.59	\$ 93.66	\$ 104.77	\$ 94.69	5.10%	1.67%	\$ 173.46	\$126.91	\$ 107.46	\$ 120.22	\$ 108.64	5.16%	1.68%	\$ 13.95	14.7%	0.1%	0.0%
13 hot		\$ 153.46					5.68%				\$ 115.07			5.96%		\$ 15.35	14.7%	0.3%	0.1%
14 hot		\$ 149.30									\$106.24			8.21%	2.34%	\$ 14.13	14.7%	0.2%	0.0%
15 hot		\$ 179.12					8.90%				\$ 158.75			8.99%		\$ 20.18	14.8%	0.1%	0.0%
16 cool		\$ 138.09					5.61%				\$ 97.65			5.79%	1.92%	\$ 13.71	14.7%	0.2%	0.0%
5 warm	,	\$ 84.96					7.42%				\$132.74			7.93%		\$ 18.95	14.8%	0.5%	0.1%
6 cool		\$ 85.23		-	-	-	5.12%							5.48%		\$ 10.62	14.7%	0.4%	
8 cool		\$ 99.71					5.81%							6.28%		\$ 10.64	14.7%	0.5%	
9 warm	1,160,081	\$119.28	\$ 91.34	\$ 88.11	\$ 86.83	\$ 88.00	6.20%	1.46%	\$ 136.89	\$104.80	\$ 101.09	\$ 99.61	\$ 100.96	7.02%	1.50%	\$ 12.96	14.7%	0.8%	0.0%

1Estimated # of Housing Units is based on the 2020 Affordability Ratio Calculator (ARC)

	Affordability Metrics - Hours-at-Minimum Wage (HM) Impacts Current - March 1, 2023														
							Current - Ma	rch 1, 2023							
		Average	e Usage					Essential Usag	e	-					
	Estimated # of Housing		All- Electric		All-Electric	Average	Average Bill State	Average Bill Los Angeles City	Average Bill Los Angeles Co. Malibu City Santa Monica City	Average Bill West Hollywood	Average Bill Pasadena City				
Climate Zone	Units1	Basic Bill	Bill	Basic Bill	Bill	Bill	(\$15.50/hr.)2	(\$16.04/hr.)2	(\$15.96/hr.)2	(\$17.50/hr.)2	(\$16.11/hr.)2				
10 hot (Sec 745)	1,347,156	\$ 151.12	\$ 110.59	\$ 93.66	\$ 104.77	\$ 94.69	6.1	-	5.9	-	-				
13 hot	166,335	\$ 153.46	\$ 153.97	\$ 100.29	\$ 150.70	\$ 104.09	6.7	-	-	-	-				
14 hot	466,812	\$ 149.30	\$ 155.68	\$ 92.59	\$ 130.41	\$ 95.88	6.2	-	6.0	-	-				
15 hot	235,147	\$ 179.12	\$ 155.12	\$ 138.31	\$ 126.35	\$ 136.60	8.8	-	-	-	-				
16 cool	150,603	\$ 138.09	\$ 136.16	\$ 85.12	\$ 128.70	\$ 93.05	6.0	5.8	5.8	-	5.8				
5 warm	7,859	\$ 84.96	\$ 115.54	\$ 115.67	\$ 151.99	\$ 128.36	8.3	-	-	-	-				
6 cool	943,130	\$ 85.23	\$ 83.68	\$ 72.09	\$ 73.15	\$ 72.27	4.7	4.5	4.5	-	-				
8 cool	1,246,054	\$ 99.71	\$ 87.87	\$ 72.09	\$ 74.44	\$ 72.34	4.7	4.5	4.5	-	-				
9 warm	1,160,081	\$ 119.28	\$ 91.34	\$ 88.11	\$ 86.83	\$ 88.00	5.7	5.5	5.5	5.0	5.5				

₂Minimum Wage values are based on values in effect on January 1, 2023

							Proposed	d - 2025			
		Average	e Usage					Essential Usag	e		
Climate Zone	Estimated # of Housing Units1	Basic Bill	All- Electric Bill	Basic Bill	All-Electric Bill	Average Bill	Average Bill State (\$15.50/hr.)2	Average Bill Los Angeles City (\$16.04/hr.)2	Average Bill Los Angeles Co. Malibu City Santa Monica City (\$15.96/hr.)2	Average Bill West Hollywood (\$17.50/hr.)2	Average Bill Pasadena City (\$16.11/hr.)2
10 hot (Sec 745)	1,347,156	\$ 167.03	\$ 122.21	\$ 103.49	\$ 115.78	\$ 104.63	6.8	-	6.6	-	-
13 hot	166,335	\$ 169.62	\$ 170.18	\$ 110.82	\$ 166.57	\$ 115.02	7.4	-	-	-	-
14 hot	466,812	\$ 165.02	\$ 172.06	\$ 102.31	\$ 144.13	\$ 105.94	6.8	-	6.6	-	-
15 hot	235,147	\$ 197.99	\$ 171.45	\$ 152.87	\$ 139.64	\$ 150.98	9.7	-	-	-	-
16 cool	150,603	\$ 152.62	\$ 150.49	\$ 94.04	\$ 142.24	\$ 102.81	6.6	6.4	6.4	-	6.4
5 warm	7,859	\$ 93.87	\$ 127.69	\$ 127.83	\$ 167.99	\$ 141.86	9.2	-	-	-	-
6 cool	943,130	\$ 94.17	\$ 92.45	\$ 79.63	\$ 80.81	\$ 79.83	5.2	5.0	5.0	-	-
8 cool	1,246,054	\$ 110.17	\$ 97.09	\$ 79.63	\$ 82.23	\$ 79.92	5.2	5.0	5.0	-	-
9 warm	1,160,081	\$ 131.82	\$ 100.92	\$ 97.35	\$ 95.93	\$ 97.23	6.3	6.1	6.1	5.6	6.0

	Affordability Metrics - Hours-at-Minimum Wage (HM) Impacts														
						Proposed 2	025 Change								
						Essentia	al Usage								
						Average Bill	Average Bill								
						Los Angeles	Los Angeles								
						Co.	Co.	Average Bill							
		Average Bill	Average	Average Bill	Average Bill	Malibu City	Malibu City	West	Average Bill	Average Bill	Average Bill				
	Estimated #	State	Bill	Los Angeles	Los Angeles	Santa Monica	Santa Monica	Hollywood	West	Pasadena	Pasadena				
	of Housing	Hour	State	City	City	City	City	Hour	Hollywood	City	City				
Climate Zone	Units1	Change	% Change	Hour Change	% Change	Hour Change	% Change	Change	% Change	Hour Change	% Change				
10 hot (Sec 745)	1,347,156	0.64	10.5%	-	-	0.62	10.5%	-	-	-	-				
13 hot	166,335	0.71	10.5%	-	-	-	-	-	-	-	-				
14 hot	466,812	0.65	10.5%	-	-	0.63	10.5%	-	-	-	-				
15 hot	235,147	0.93	10.5%	-	-	-	-	-	-	-	-				
16 cool	150,603	0.63	10.5%	0.61	10.5%	0.61	10.5%	-	-	0.61	10.5%				
5 warm	7,859	0.87	10.5%	-	-	-	-	-	-	-	-				
6 cool	943,130	0.49	10.5%	0.47	10.5%	0.47	10.5%	-	-	-	-				
8 cool	1,246,054	0.49	10.5%	0.47	10.5%	0.47	10.5%	-	-	-	-				
9 warm	1,160,081	0.60	10.5%	0.58	10.5%	0.58	10.5%	0.53	10.5%	0.57	10.5%				

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			Affor	dability N	/letrics - ⊦	lours-at-	Minimum W	/age (HM) Imp	pacts		
							Current - Ma	rch 1, 2023			
		Average	e Usage					Essential Usag	e		
	Estimated # of Housing		All- Electric		All-Electric	Average	Average Bill State	Average Bill Los Angeles City	Average Bill Los Angeles Co. Malibu City Santa Monica City	Average Bill West Hollywood	Average Bill Pasadena City
Climate Zone	Units1	Basic Bill	Bill	Basic Bill	Bill	Bill	(\$15.50/hr.)2	(\$16.04/hr.)2	(\$15.96/hr.)2	(\$17.50/hr.)2	(\$16.11/hr.)2
10 hot (Sec 745)	1,347,156	\$ 151.12	\$ 110.59	\$ 93.66	\$ 104.77	\$ 94.69	6.1	-	5.9	-	-
13 hot	166,335	\$ 153.46	\$ 153.97	\$ 100.29	\$ 150.70	\$ 104.09	6.7	-	-	-	-
14 hot	466,812	\$ 149.30	\$ 155.68	\$ 92.59	\$ 130.41	\$ 95.88	6.2	-	6.0	-	-
15 hot	235,147	\$ 179.12	\$ 155.12	\$ 138.31	\$ 126.35	\$ 136.60	8.8	-	-	-	-
16 cool	150,603	\$ 138.09	\$ 136.16	\$ 85.12	\$ 128.70	\$ 93.05	6.0	5.8	5.8	-	5.8
5 warm	7,859	\$ 84.96	\$ 115.54	\$ 115.67	\$ 151.99	\$ 128.36	8.3	-	-	-	-
6 cool	943,130	\$ 85.23	\$ 83.68	\$ 72.09	\$ 73.15	\$ 72.27	4.7	4.5	4.5	-	-
8 cool	1,246,054	\$ 99.71	\$ 87.87	\$ 72.09	\$ 74.44	\$ 72.34	4.7	4.5	4.5	-	-
9 warm	1,160,081	\$ 119.28	\$ 91.34	\$ 88.11	\$ 86.83	\$ 88.00	5.7	5.5	5.5	5.0	5.5

₂Minimum Wage values are based on values in effect on January 1, 2023

							Proposed	d - 2026			
		Average	e Usage					Essential Usag	e		
Climate Zone	Estimated # of Housing Units1	Basic Bill	All- Electric Bill	Basic Bill	All-Electric Bill	Average Bill	Average Bill State (\$15.50/hr.)2	Average Bill Los Angeles City (\$16.04/hr.)2	Average Bill Los Angeles Co. Malibu City Santa Monica City (\$15.96/hr.)2	Average Bill West Hollywood (\$17.50/hr.)2	Average Bill Pasadena City (\$16.11/hr.)2
10 hot (Sec 745)	1,347,156	\$ 170.07	\$ 124.43	\$ 105.37	\$ 117.88	\$ 106.53	6.9	-	6.7	-	-
13 hot	166,335	\$ 172.71	\$ 173.28	\$ 112.83	\$ 169.60	\$ 117.11	7.6	-	-	-	-
14 hot	466,812	\$ 168.02	\$ 175.20	\$ 104.17	\$ 146.75	\$ 107.86	7.0	-	6.8	-	-
15 hot	235,147	\$ 201.60	\$ 174.57	\$ 155.65	\$ 142.18	\$ 153.72	9.9	-	-	-	-
16 cool	150,603	\$ 155.40	\$ 153.22	\$ 95.75	\$ 144.82	\$ 104.68	6.8	6.5	6.5	-	6.5
5 warm	7,859	\$ 95.57	\$ 130.01	\$ 130.15	\$ 171.04	\$ 144.44	9.3	-	-	-	-
6 cool	943,130	\$ 95.88	\$ 94.13	\$ 81.08	\$ 82.28	\$ 81.28	5.2	5.1	5.1	-	-
8 cool	1,246,054	\$ 112.18	\$ 98.85	\$ 81.08	\$ 83.72	\$ 81.36	5.2	5.1	5.1	-	-
9 warm	1,160,081	\$ 134.22	\$ 102.76	\$ 99.12	\$ 97.67	\$ 98.99	6.4	6.2	6.2	5.7	6.1

			Afforda	bility Metri	cs - Hours-at	-Minimum V	Nage (HM) Ir	npacts			
						Proposed 2	026 Change				
						Essentia	al Usage				
						Average Bill	Average Bill				
						Los Angeles	Los Angeles				
						Co.	Co.	Average Bill			
		Average Bill	Average	Average Bill	Average Bill	Malibu City	Malibu City	West	Average Bill	Average Bill	Average Bill
	Estimated #	State	Bill	Los Angeles	Los Angeles	Santa Monica	Santa Monica	Hollywood	West	Pasadena	Pasadena
	of Housing	Hour	State	City	City	City	City	Hour	Hollywood	City	City
Climate Zone	Units1	Change	% Change	Hour Change	% Change	Hour Change	% Change	Change	% Change	Hour Change	% Change
10 hot (Sec 745)	1,347,156	0.76	12.5%	-	-	0.74	12.5%	-	-	-	-
13 hot	166,335	0.84	12.5%	-	-	-	-	-	-	-	-
14 hot	466,812	0.77	12.5%	-	-	0.75	12.5%	-	-	-	-
15 hot	235,147	1.10	12.5%	-	-	-	-	-	-	-	-
16 cool	150,603	0.75	12.5%	0.73	12.5%	0.73	12.5%	-	-	0.72	12.5%
5 warm	7,859	1.04	12.5%	-	-	-	-	-	-	-	-
6 cool	943,130	0.58	12.5%	0.56	12.5%	0.56	12.5%	-	-	-	-
8 cool	1,246,054	0.58	12.5%	0.56	12.5%	0.57	12.5%	-	-	-	-
9 warm	1,160,081	0.71	12.5%	0.69	12.5%	0.69	12.5%	0.63	12.5%	0.68	12.5%

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			Affore	dability N	/letrics - ⊦	lours-at-	Minimum W	/age (HM) Imp	pacts		
							Current - Ma	rch 1, 2023			
Average Usage Essential Usage											
	Estimated # of Housing		All- Electric		All-Electric	Average	Average Bill State	Average Bill Los Angeles City	Average Bill Los Angeles Co. Malibu City Santa Monica City	Average Bill West Hollywood	Average Bill Pasadena City
Climate Zone	Units1	Basic Bill	Bill	Basic Bill	Bill	Bill	(\$15.50/hr.)2	(\$16.04/hr.)2	(\$15.96/hr.)2	(\$17.50/hr.)2	(\$16.11/hr.)2
10 hot (Sec 745)	1,347,156	\$ 151.12	\$ 110.59	\$ 93.66	\$ 104.77	\$ 94.69	6.1	-	5.9	-	-
13 hot	166,335	\$ 153.46	\$ 153.97	\$ 100.29	\$ 150.70	\$ 104.09	6.7	-	-	-	-
14 hot	466,812	\$ 149.30	\$ 155.68	\$ 92.59	\$ 130.41	\$ 95.88	6.2	-	6.0	-	-
15 hot	235,147	\$ 179.12	\$ 155.12	\$ 138.31	\$ 126.35	\$ 136.60	8.8	-	-	-	-
16 cool	150,603	\$ 138.09	\$ 136.16	\$ 85.12	\$ 128.70	\$ 93.05	6.0	5.8	5.8	-	5.8
5 warm	7,859	\$ 84.96	\$ 115.54	\$ 115.67	\$ 151.99	\$ 128.36	8.3	-	-	-	-
6 cool	943,130	\$ 85.23	\$ 83.68	\$ 72.09	\$ 73.15	\$ 72.27	4.7	4.5	4.5	-	-
8 cool	1,246,054	\$ 99.71	\$ 87.87	\$ 72.09	\$ 74.44	\$ 72.34	4.7	4.5	4.5	-	-
9 warm	1,160,081	\$ 119.28	\$ 91.34	\$ 88.11	\$ 86.83	\$ 88.00	5.7	5.5	5.5	5.0	5.5

₂Minimum Wage values are based on values in effect on January 1, 2023

							Proposed	d - 2027					
		Average	e Usage	Essential Usage									
Climate Zone	Estimated # of Housing Units1	Basic Bill	All- Electric Bill	Basic Bill	All-Electric Bill	Average Bill	Average Bill State (\$15.50/hr.)2	Average Bill Los Angeles City (\$16.04/hr.)2	Average Bill Los Angeles Co. Malibu City Santa Monica City (\$15.96/hr.)2	Average Bill West Hollywood (\$17.50/hr.)2	Average Bill Pasadena City (\$16.11/hr.)2		
10 hot (Sec 745)	1,347,156	\$ 171.73	\$ 125.64	\$ 106.39	\$ 119.03	\$ 107.56	6.9	-	6.7	-	-		
13 hot	166,335	\$ 174.39	\$ 174.96	\$ 113.92	\$ 171.25	\$ 118.25	7.6	-	-	-	-		
14 hot	466,812	\$ 169.65	\$ 176.90	\$ 105.18	\$ 148.17	\$ 108.91	7.0	-	6.8	-	-		
15 hot	235,147	\$ 203.56	\$ 176.27	\$ 157.16	\$ 143.56	\$ 155.22	10.0	-	-	-	-		
16 cool	150,603	\$ 156.91	\$ 154.71	\$ 96.68	\$ 146.23	\$ 105.69	6.8	6.6	6.6	-	6.6		
5 warm	7,859	\$ 96.50	\$ 131.27	\$ 131.41	\$ 172.71	\$ 145.85	9.4	-	-	-	-		
6 cool	943,130	\$ 96.80	\$ 95.04	\$ 81.86	\$ 83.08	\$ 82.07	5.3	5.1	5.1	-	-		
8 cool	1,246,054	\$ 113.26	\$ 99.81	\$ 81.86	\$ 84.53	\$ 82.15	5.3	5.1	5.1	-	-		
9 warm	1,160,081	\$ 135.52	\$ 103.75	\$ 100.08	\$ 98.62	\$ 99.95	6.4	6.2	6.3	5.7	6.2		

			Afforda	bility Metrie	cs - Hours-at	-Minimum V	Nage (HM) Ir	npacts			
						Proposed 2	027 Change				
						Essentia	al Usage				
						Average Bill	Average Bill				
						Los Angeles	Los Angeles				
						Co.	Co.	Average Bill			
		Average Bill	Average	Average Bill	Average Bill	Malibu City	Malibu City	West	Average Bill	Average Bill	Average Bill
	Estimated #	State	Bill	Los Angeles	Los Angeles	Santa Monica	Santa Monica	Hollywood	West	Pasadena	Pasadena
	of Housing	Hour	State	City	City	City	City	Hour	Hollywood	City	City
Climate Zone	Units1	Change	% Change	Hour Change	% Change	Hour Change	% Change	Change	% Change	Hour Change	% Change
10 hot (Sec 745)	1,347,156	0.83	13.6%	-	-	0.81	13.6%	-	-	-	-
13 hot	166,335	0.91	13.6%	-	-	-	-	-	-	-	-
14 hot	466,812	0.84	13.6%	-	-	0.82	13.6%	-	-	-	-
15 hot	235,147	1.20	13.6%	-	-	-	-	-	-	-	-
16 cool	150,603	0.82	13.6%	0.79	13.6%	0.79	13.6%	-	-	0.79	13.6%
5 warm	7,859	1.13	13.6%	-	-	-	-	-	-	-	-
6 cool	943,130	0.63	13.6%	0.61	13.6%	0.61	13.6%	-	-	-	-
8 cool	1,246,054	0.63	13.6%	0.61	13.6%	0.61	13.6%	-	-	-	-
9 warm	1,160,081	0.77	13.6%	0.75	13.6%	0.75	13.6%	0.68	13.6%	0.74	13.6%

CARE

			Affor	dability N	/letrics - H	lours-at-	Minimum W	/age (HM) Imp	oacts					
				Current - March 1, 2023										
		Average	e Usage	Usage Essential Usage										
	Estimated #		All-				Average Bill	Average Bill	Average Bill Los Angeles Co. Malibu City Santa Monica	Average Bill West	Average Bill			
Climate Zone	of Housing Units1	Basic Bill	Electric Bill	Basic Bill	All-Electric Bill	Average Bill	State (\$15.50/hr.)2	Los Angeles City (\$16.04/hr.)2	City (\$15.96/hr.)2	Hollywood (\$17.50/hr.)2	Pasadena City (\$16.11/hr.)2			
10 hot (Sec 745)	1,347,156	\$ 151.12	\$ 110.59	\$ 93.66	\$ 104.77	\$ 94.69	6.1	-	5.9	-	-			
13 hot	166,335	\$ 153.46		\$ 100.29	\$ 150.70	\$ 104.09	6.7	-	-	-	-			
14 hot	466,812	\$ 149.30	\$ 155.68	\$ 92.59	\$ 130.41	\$ 95.88	6.2	-	6.0	-	-			
15 hot	235,147	\$ 179.12	\$ 155.12	\$ 138.31	\$ 126.35	\$ 136.60	8.8	-	-	-	-			
16 cool	150,603	\$ 138.09	\$ 136.16	\$ 85.12	\$ 128.70	\$ 93.05	6.0	5.8	5.8	-	5.8			
5 warm	7,859	\$ 84.96	\$ 115.54	\$ 115.67	\$ 151.99	\$ 128.36	8.3	-	-	-	-			
6 cool	943,130	\$ 85.23	\$ 83.68	\$ 72.09	\$ 73.15	\$ 72.27	4.7	4.5	4.5	-	-			
8 cool	1,246,054	\$ 99.71	\$ 87.87	\$ 72.09	\$ 74.44	\$ 72.34	4.7	4.5	4.5	-	-			
9 warm	1,160,081	\$ 119.28	\$ 91.34	\$ 88.11	\$ 86.83	\$ 88.00	5.7	5.5	5.5	5.0	5.5			

₂Minimum Wage values are based on values in effect on January 1, 2023

							Proposed	d - 2028					
		Average	e Usage	Essential Usage									
	Estimated # of Housing		All- Electric		All-Electric	Average	Average Bill State	Average Bill Los Angeles City	Average Bill Los Angeles Co. Malibu City Santa Monica City	Average Bill West Hollywood	Average Bill Pasadena City		
Climate Zone	Units1	Basic Bill	Bill	Basic Bill	Bill	Bill	(\$15.50/hr.)2	(\$16.04/hr.)2	(\$15.96/hr.)2	(\$17.50/hr.)2	(\$16.11/hr.)2		
10 hot (Sec 745)	1,347,156	\$ 173.46	\$ 126.91	\$ 107.46	\$ 120.22	\$ 108.64	7.0	-	6.8	-	-		
13 hot	166,335	\$ 176.15	\$ 176.73	\$ 115.07	\$ 172.98	\$ 119.44	7.7	-	-	-	-		
14 hot	466,812	\$ 171.37	\$ 178.69	\$ 106.24	\$ 149.67	\$ 110.01	7.1	-	6.9	-	-		
15 hot	235,147	\$ 205.61	\$ 178.05	\$ 158.75	\$ 145.01	\$ 156.78	10.1	-	-	-	-		
16 cool	150,603	\$ 158.49	\$ 156.27	\$ 97.65	\$ 147.70	\$ 106.76	6.9	6.7	6.7	-	6.6		
5 warm	7,859	\$ 97.47	\$ 132.60	\$ 132.74	\$ 174.45	\$ 147.32	9.5	-	-	-	-		
6 cool	943,130	\$ 97.78	\$ 95.99	\$ 82.68	\$ 83.91	\$ 82.89	5.3	5.2	5.2	-	-		
8 cool	1,246,054	\$ 114.40	\$ 100.81	\$ 82.68	\$ 85.38	\$ 82.98	5.4	5.2	5.2	-	-		
9 warm	1,160,081	\$ 136.89	\$ 104.80	\$ 101.09	\$ 99.61	\$ 100.96	6.5	6.3	6.3	5.8	6.3		

			Afforda	bility Metri	cs - Hours-at	-Minimum V	Vage (HM) In	npacts					
						Proposed 2	028 Change						
		Essential Usage											
	Estimated # of Housing	Average Bill State Hour	Average Bill State	Average Bill Los Angeles City	Average Bill Los Angeles City	Average Bill Los Angeles Co. Malibu City Santa Monica City	Average Bill Los Angeles Co. Malibu City Santa Monica City	Average Bill West Hollywood Hour	Average Bill West Hollywood	Average Bill Pasadena City	Average Bill Pasadena City		
Climate Zone	Units1	Change		Hour Change	% Change	Hour Change	% Change	Change	% Change	Hour Change			
10 hot (Sec 745)	1,347,156	0.90	14.7%	-	-	0.87	14.7%	-	-	-	-		
13 hot	166,335	0.99	14.7%	-	-	-	-	-	-	-	-		
14 hot	466,812	0.91	14.7%	-	-	0.89	14.7%	-	-	-	-		
15 hot	235,147	1.30	14.8%	-	-	-	-	-	-	-	-		
16 cool	150,603	0.88	14.7%	0.85	14.7%	0.85	14.7%	-	-	0.85	14.7%		
5 warm	7,859	1.22	14.8%	-	-	-	-	-	-	-	-		
6 cool	943,130	0.69	14.7%	0.66	14.7%	0.67	14.7%	-	-	-	-		
8 cool	1,246,054	0.69	14.7%	0.66	14.7%	0.67	14.7%	-	-	-	-		
9 warm	1,160,081	0.84	14.7%	0.81	14.7%	0.81	14.7%	0.74	14.7%	0.80	14.7%		

		Affordabilit	y Metrics - A	reas of Affordab	oility Concern	
PUMA	County/City	Electric Climate Zone	Estimated # of Housing Units1	Current - March 1, 2023 Electric Service AR 20	Proposed - 2025 Electric Service AR 20	Incremental Change Electric Service AR 20
	Los Angeles County (Central)Glendale					
03719	'	SCE 9	17	16.96%	19.16%	2.20%
	Los Angeles County (South)Long Beach City (Southwest & Port)					
03766	· ,	SCE 6	39,619	13.77%	15.21%	1.43%
	Los Angeles County (Central)West Hollywood & Beverly Hills Cities					
03731	PUMA	SCE 9	64,887	28.67%	37.32%	8.65%
	Orange County (Central)Irvine City (Central)					
05904		SCE 6	13,038	13.76%	16.16%	2.41%
	Orange County (Central)Irvine City (Central)					
05904	PUMA	SCE 8	109,702	13.84%	16.29%	2.45%

Affordability Metrics - Areas of Affordability Concern						
PUMA	County/City	Electric Climate Zone	Estimated # of Housing Units1	Current - March 1, 2023 Electric Service AR 20	Proposed - 2026 Electric Service AR 20	Incremental Change Electric Service AR 20
	Los Angeles County (Central)Glendale					
03719	,	SCE 9	17	16.96%	19.17%	2.20%
	Los Angeles County (South)Long Beach City (Southwest & Port)					
03766	` '	SCE 6	39,619	13.77%	15.14%	1.37%
	Los Angeles County (Central)West Hollywood & Beverly Hills Cities					
03731		SCE 9	64,887	28.67%	38.54%	9.86%
	Orange County (Central)Irvine City (Central)					
05904		SCE 6	13,038	13.76%	16.31%	2.55%
	Orange County (Central)Irvine City (Central)					
05904	PUMA	SCE 8	109,702	13.84%	16.44%	2.59%

Affordability Metrics - Areas of Affordability Concern						
PUMA	County/City	Electric Climate Zone	Estimated # of Housing Units1	Current - March 1, 2023 Electric Service AR 20	Proposed - 2027 Electric Service AR 20	Incremental Change Electric Service AR 20
	Los Angeles County (Central)Glendale					
03719	City PUMA	SCE 9	17	16.96%	19.02%	2.06%
	Los Angeles County (South)Long Beach City (Southwest & Port)					
03766	PUMA	SCE 6	39,619	13.77%	14.96%	1.19%
	Los Angeles County (Central)West Hollywood & Beverly Hills Cities					
03731	PUMA	SCE 9	64,887	28.67%	39.59%	10.91%
	Orange County (Central)Irvine City (Central)					
05904	PUMA	SCE 6	13,038	13.76%	16.33%	2.57%
	Orange County (Central)Irvine City (Central)					
05904	PUMA	SCE 8	109,702	13.84%	16.46%	2.62%

Affordability Metrics - Areas of Affordability Concern						
PUMA	County/City	Electric Climate Zone	Estimated # of Housing Units1	Current - March 1, 2023 Electric Service AR 20	Proposed - 2028 Electric Service AR 20	Incremental Change Electric Service AR 20
	Los Angeles County (Central)Glendale					
03719	City PUMA	SCE 9	17	16.96%	19.21%	2.25%
	Los Angeles County (South)Long Beach City (Southwest & Port)					
03766		SCE 6	39,619	13.77%	15.11%	1.34%
	Los Angeles County (Central)West Hollywood & Beverly Hills Cities					
03731	PUMA	SCE 9	64,887	28.67%	39.98%	11.31%
	Orange County (Central)Irvine City (Central)					
05904		SCE 6	13,038	13.76%	16.49%	2.74%
	Orange County (Central)Irvine City (Central)					
05904	PUMA	SCE 8	109,702	13.84%	16.63%	2.78%

RULE 1.11 VERIFICATION

I am an officer of the applicant corporation herein and am authorized to make this

verification on its behalf. I am informed and believe that the matters stated in the foregoing

document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of May, 2023 at Rosemead, California.

/s/ Steven Powell

Steven Powell President & CEO SOUTHERN CALIFORNIA EDISON COMPANY

> 8631 Rush Street Post Office Box 800 Rosemead, California 91770