

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



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Order Instituting Rulemaking to Oversee
the Resource Adequacy Program, Consider
Program Reforms and Refinements, and
Establish Forward Resource Adequacy
Procurement Obligations.

R.25-10-003

**OPENING COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY
(U 338-E) ON THE ORDER INSTITUTING RULEMAKING TO OVERSEE THE
RESOURCE ADEQUACY PROGRAM, CONSIDER PROGRAM REFORMS AND
REFINEMENTS, AND ESTABLISH FORWARD RESOURCE ADEQUACY
PROCUREMENT OBLIGATIONS**

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Pursuant to Rule 14.3 of the California Public Utilities Commission’s Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully submits the following Opening Comments on the *Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Reforms and Refinements, and Establish Forward Resource Adequacy Procurement Obligations* issued on October 15, 2025 (OIR).

I.

INTRODUCTION

The OIR directs parties to identify and prioritize issues for refinement of the Resource Adequacy (RA) program. SCE generally agrees that the Commission’s preliminary scoping determination includes the highest priority issues. SCE, however, proposes that the Commission

include two additional items – Demand Response (DR) accreditation and off-peak import counting rules.

Although the Commission’s preliminary determination on scope generally identifies the 2028 Loss of Load Expectation (LOLE) study as a high priority issue, the proposed schedule does not adequately prioritize the work on the 2028 LOLE study by omitting it from the proposed schedule. In the prior RA proceeding, the Commission could not address the issues identified with the LOLE study during the time available to address the issue. To avoid that same outcome here, SCE proposes that the Commission’s final Scoping Memo and Ruling adopt a 2028 LOLE-specific study schedule that will allow the Commission to benefit from robust stakeholder participation.

To have an adequately robust process, that work must commence in March 2026 to develop the 2028 LOLE study Inputs and Assumptions (I&A) and continue through April 2027 to have a final decision in June 2027 on the 2028 Planning Reserve Margin (PRM). Given the timing and complexity of the work, especially for the new Slice-of-Day (SoD) framework, it is imperative that the parties and the Commission have a clear understanding of deliverables and a schedule in which to perform them. SCE therefore proposes to divide the proceeding into two tracks as reflected in the schedule proposed in Section III below.

As for categorization and hearings, the proceeding is properly categorized as ratesetting and hearings are likely unnecessary. The Commission should therefore preliminarily determine that there will not be hearings but include in the schedule an opportunity for parties to submit motions requesting hearings that identify disputed material issues of fact that cannot be resolved without cross examination at hearings.

II.

SCE RECOMMENDS ADDING TWO ISSUES TO THE SCOPE

SCE agrees with the Ruling’s preliminary determination to include certain issues in scope and also recommends that the Commission include two additional items.

A. The Commission Should Include Demand Response Accreditation in the Proceeding's Scope

SCE requests that the Commission include in the scope of this proceeding a review of current limitations on DR resource accreditation outside the Availability Assessment Hours (AAH). Under existing rules, DR programs such as BIP, AP-I, SDP, and SEP may not be eligible to receive RA credit starting in the 2028 compliance year due to the restriction that QC values can only be assigned within the AAH. This issue warrants consideration given evolving system needs and the potential misalignment between DR capabilities and the current RA framework.

B. The Commission Should Include Off-Peak Import Counting Rules in the Proceeding's Scope

In D.25-06-048, the Commission agreed “it is reasonable to extend the off-peak import counting rule, as the rule may help with affordability issues with off-peak imports that are lower cost than a 24 x 7 product. However, as the rule adopted in D.24-06-004 has not yet been utilized for 2025, the Commission deems it reasonable to only extend the import counting rule to Q3 2026, in addition to Q3 2025. After Q3 2025, the Commission will reevaluate the counting rule and determine whether it is necessary and feasible to extend it beyond 2026. Accordingly, the off-peak import counting rule adopted in OP 12 of D.24-06-004 is modified to apply to 3rd Quarter of 2025 and 3rd Quarter of 2026.”¹ Thus, the Commission should include that reevaluation in the scope of this proceeding.

III.

THE COMMISSION SHOULD AMEND THE SCHEDULE TO INCLUDE AN LOLE STUDY-SPECIFIC SCHEDULE

The preliminary determination on scope identifies the 2028 LOLE study as a priority issue but the proposed schedule does not prioritize the work associated with the 2028 LOLE

¹ D.25-06-048, p. 89.

study. To ensure the Commission and parties have enough time to engage in a robust stakeholder process for the complex work being done to develop a PRM in the new SoD framework, the Commission should provide parties and Energy Division with a schedule that clearly identifies responsibilities and tasks and the time which parties and Energy Division have to perform them. SCE therefore proposes the Commission amend the schedule.

In Track 3 of the prior RA proceeding, the Commission indicated that it might include a detailed LOLE study schedule in this proceeding. In comments on the proposed Track 3 decision in the prior RA proceeding, SCE proposed that the Commission should build a schedule that allows for robust participation by affording parties reasonable time to review and comment on the 2028 LOLE study process and conduct a workshop on Energy Division's and parties' independent 2028 LOLE studies before Energy Division finalizes its 2028 LOLE Study and PRM proposal.² The final decision authorized Energy Division "to publish the 2028 LOLE study in July 2026 for evaluation and consideration by stakeholders" and indicated that "Energy Division is expected to submit proposed Inputs and Assumptions for a new LOLE study in March 2026 and complete a new RA LOLE study for the 2028 RA year in July 2026. The 2028 LOLE study will be submitted into the successor RA proceeding for stakeholder evaluation and consideration. A more detailed LOLE study schedule may be included in a scoping memo in the successor RA proceeding."³

The OIR's proposed schedule, however, does not incorporate the more detailed LOLE study schedule the Track 3 Decision contemplated. SCE recommends that the Commission therefore adopt SCE's proposed 2028 LOLE study schedule, set forth below, in the final Scoping Memo and Ruling. SCE's proposed schedule generally incorporates the Track 3 decision dates and proposes more dates and activities for each step of the process. Specifically, SCE proposes a revised schedule that divides the proceeding into two tracks. The work associated with the 2028 LOLE study occurs in Track 2 but commences in March 2026, overlapping with Track 1 activities, to ensure there is sufficient time for a robust stakeholder process. To start the 2028

² SCE Track 3 PD Opening Comment, p. 3.

³ D.25-06-048, p. 38.

LOLE study I&A work, as contemplated by the Track 3 decision, in March 2026, the Commission must complete the UCAP methodology to ensure that outage data for all resources is incorporated in the 2028 LOLE study I&A. Other than finalizing the 2028 LOLE study I&A, the Track 2 2028 LOLE study-related work will occur after the Commission issues a Track 1 decision. Below is a combined Track 1 and Track 2 schedule and an isolated Track 2 schedule.

Proposed Revised Combined Track 1 and 2 Schedules	
Opening Comments on OIR	November 4, 2025
Reply Comments on OIR	November 14, 2025
Prehearing Conference	November 17, 2025
Final Scoping Memo and Ruling	December 1, 2025
Party Proposals	January 23, 2026
Energy Division Hosted Workshops on All Proposals	January 30, 2026
Comments on Party Proposals	February 13, 2026
Reply Comments on Party Proposals	March 2, 2026
2028 RA LOLE Study: Energy Division (ED) Publishes DRAFT Inputs & Assumptions (I&A)⁴	March 30, 2026
Parties File Motions for Hearings (only if needed to test material issues of disputed fact that cannot be resolved on commentary)	April 2026
CAISO Publishes Draft LCR/FRC Report	April 2026
Comments on Draft CAISO LCR/FCR Report	April 2026 (15 days from Draft)
2028 RA LOLE Study: Opening Comments on DRAFT ED I&A	May 1, 2026

⁴ ED should share the draft I&A so that parties may comment upon them given that they will be using the final I&A to conduct their own studies.

2028 RA LOLE Study: Reply Comments on DRAFT ED I&A	May 15, 2026
CAISO Publishes Final LCR/ FCR Report	Mid-May 2026
Comments on Final LCR/FRC Report	Late May 2026
Track 1 Proposed Decision on 2027 RA Year Requirements and UCAP	Late May 2026
Track 1 Final Decision on 2027 RA Requirements and UCAP	June 2026
2028 RA LOLE Study: ED Serves FINAL I&A	June 2, 2026
2028 RA LOLE Study: ED and Parties Complete and Serve/File⁵ Respective DRAFT 2028 LOLE Studies and PRM Proposals	July 31, 2026
2028 RA LOLE Study: Opening Comments on DRAFT 2028 LOLE Studies and PRM Proposals	September 4, 2026
2028 RA LOLE Study: Reply Comments on DRAFT 2028 LOLE Studies and PRM Proposals	September 14, 2026
2028 RA LOLE Study: Workshop on Energy Division and Party Studies	September 18, 2026
2028 RA LOLE Study: ED and Parties Serve/File Respective FINAL 2028 LOLE Studies and PRM Proposals	October 30, 2026
2028 RA LOLE Study: Opening Comments on Final 2028 LOLE Study and PRM Proposal	December 1, 2026
2028 RA LOLE Study: Reply Comments on Final 2028 LOLE Study and PRM Proposal	December 21, 2026

⁵ The Commission should only require the ED to serve its materials on the service list. It should, however, require parties to file their studies so that they are part of the record. Alternatively, the Commission can require the studies to be submitted as testimony and require parties to move that testimony into the record.

2028 RA LOLE Study: Opportunities for ED Revisions and Comments thereon	December 2026 -April 2027
Track 2 2028 RA Requirements Proposed Decision	May 2027
Track 2 2028 RA Requirements Final Decision	June 2027

Isolated Track 2 Schedule	
2028 RA LOLE Study: Energy Division (ED) Publishes DRAFT Inputs & Assumptions (I&A) to allow Parties to comment on ED's and develop their own LOLE studies	March 30, 2026
2028 RA LOLE Study: Opening Comments on DRAFT ED I&A	May 1, 2026
2028 RA LOLE Study: Reply Comments on DRAFT ED I&A	May 15, 2026
2028 RA LOLE Study: ED Serves FINAL I&A	June 2, 2026
2028 RA LOLE Study: ED and Parties Complete and Serve/File⁶ Respective DRAFT 2028 LOLE Studies and PRM Proposals	July 31, 2026
2028 RA LOLE Study: Opening Comments on DRAFT 2028 LOLE Studies and PRM Proposals	September 4, 2026
2028 RA LOLE Study: Reply Comments on DRAFT 2028 LOLE Studies and PRM Proposals	September 14, 2026
2028 RA LOLE Study: Workshop on Energy Division and Party Studies	September 18, 2026

⁶ The Commission should only require the ED to serve its materials on the service list, but it should require parties to file their studies so that they are part of the record. Alternatively, the Commission can require parties to serve their studies as testimony and then move that testimony into the record.

2028 RA LOLE Study: ED and Parties Serve/File Respective FINAL 2028 LOLE Studies and PRM Proposals	October 30, 2026
2028 RA LOLE Study: Opening Comments on Final 2028 LOLE Study and PRM Proposal	December 1, 2026
2028 RA LOLE Study: Reply Comments on Final 2028 LOLE Study and PRM Proposal	December 21, 2026
2028 RA LOLE Study: Opportunities for ED Revisions and Comments thereon	December 2026 -April 2027
Track 2 2028 RA Requirements Proposed Decision	May 2027
Track 2 2028 RA Requirements Final Decision	June 2027

IV.

CATEGORIZATION AND HEARINGS

The proceeding is properly categorized as ratesetting and hearings are likely unnecessary. The Commission should therefore preliminarily determine that there will not be hearings but include in the schedule an opportunity for parties to submit motions requesting hearings that identify disputed material issues of fact that cannot be resolved on the commentary.

V.

CONCLUSION

SCE respectfully request that the Commission adopt the foregoing recommendations regarding the scope, schedule, testimony and hearings.

Respectfully submitted,

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