



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

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Patterson Point LP,

Complainant,

vs.

Southern California Edison Company (U338-E)

Defendant.

C.25-06-014

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U338-E) RESPONSE TO MOTION
TO AMEND PROCEEDING SCHEDULE**

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Dated: **November 19, 2025**

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I.

INTRODUCTION

Pursuant to Administrative Law Judge (ALJ) Goldberg’s November 7, 2025, Email Ruling (Ruling), Southern California Edison Company (SCE) files this response to Complainant’s November 14, 2025, Motion to Amend Proceeding Schedule (Motion).

II.

DISCUSSION

A. SCE Agrees the Proceeding Schedule Should be Stayed Pending the Disposition of the Motion to Dismiss

SCE agrees that prioritizing the disposition of the Motion to Dismiss (MTD) would be efficient, and SCE is amenable to suspending the schedule to accommodate that goal. As noted

in the MTD, SCE believes this Complaint should be dismissed as moot because the relief requested in the Complaint is not possible, i.e., Patterson Point is installing individual/multiple meters, which SCE believes complies with its applicable tariffs and applicable law.

B. Certain Portions of the Motion, Including But Not Limited to Sections IV and V, Are Beyond the Scope of the Ruling

Significant portions of the Motion, such as Sections IV and V, are beyond the scope of the Ruling, which required Complainant to file a full explanation of why Complainant did not serve prepared testimony and to file a formal motion to amend the proceeding schedule. Sections IV and V, for example, venture substantially into litigating the merits of the case, which SCE believes is not within the scope of the Ruling. Regarding any and all arguments on the subject of Complainant's response to the MTD that were presented in the Motion, or any arguments or facts that belong procedurally in briefing or testimony if the case proceeds, SCE reserves its right to and will respond to those issues and arguments in the procedurally appropriate document, pursuant to applicable Commission Rules. Specifically, Complainant filed its response to the MTD on November 18, 2025, and SCE has requested permission to reply, pursuant to the Commission Rules of Practice and Procedure, Rule 11.1(f). SCE does not intend to waive or concede any of Complainant's arguments not addressed here.

Additionally, SCE notes that the Motion contains some reference to the timing of SCE's MTD. Had the Complaint included concise facts, i.e., that the Project was proceeding with individual metering per SCE's input, despite the fact that the Complaint requests a single meter configuration as relief, it is likely that the MTD would have been filed sooner.¹ That said, an MTD may be filed whenever a party chooses, as long as it complies with the requirements in the Commission's Rules of Practice and Procedure. Further, neither the MTD filing date, nor, for

¹ See, Rule 4.2(a) "The specific act complained of shall be set forth in ordinary and concise language. The complaint shall be so drawn as to completely advise the defendant and the Commission of the facts constituting the grounds of the complaint, the injury complained of, and the exact relief which is desired."

that matter, conversations between parties, have any bearing on Complainant's responsibility to adhere to the Commission-mandated schedule and to adhere to applicable rules to request an extension if meeting the schedule is not possible, thereby giving other parties notice and opportunity to respond and potentially avoid unnecessary expenditure of resources.

Respectfully submitted,

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