

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



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

Application 24-03-019
(Filed March 29, 2024)

**REPLY BRIEF OF THE
THE SOLAR ENERGY INDUSTRIES ASSOCIATION**

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ASSOCIATION

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November 24, 2025

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Pursuant to Rule 13.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) and the October 3, 2025 E-Mail Ruling of the Assigned Administrative Law Judge, the Solar Energy Industries Association (“SEIA”) hereby replies to the Opening Briefs on the *Application of Southern California Edison Company (U 338-E) to Establish Marginal Costs, Allocate Revenues, and Design Rates*, which were filed in the above captioned proceeding on November 3, 2025.

I. INTRODUCTION

In its Opening Brief, SEIA addressed two issues: (1) Southern California Edison Company’s (“SCE”) TOU-D PRIME Plus rate proposal; and (2) SEIA’s proposal for the adoption of Marginal Transmission Capacity Costs (“MTCC”) for SCE. With respect to the former, SEIA illustrated that the PRIME Plus rate (1) was not consistent with applicable law and prior Commission decisions regarding rate design components, (2) was not truly cost-based, and (3) had not been demonstrated to be understood by the customers for whom the rate is intended. With respect to the latter, SEIA demonstrated that the adoption of an MTCC for SCE was warranted, and the \$73 per kW-year MTCC value proposed by SEIA was just and reasonable.

In its Opening Brief, SCE attempts to defend its PRIME Plus rate, but as detailed below, the arguments which SCE advances in support of the rate have already been refuted by SEIA and

the California Public Advocates (“Cal Advocates”). SCE simply fails to demonstrate that adoption of the PRIME Plus rate would be just and reasonable. The rate must be rejected.

Both SCE and Cal Advocates argue against the adoption of an MTCC for SCE on the grounds that the issue is outside the scope of a GRC Phase 2 proceeding. This simply is not the case. GRC Phase 2 proceedings are the forum for addressing an investor owned utility’s marginal costs, and the Commission has previously used this forum to adopt an MTCC for Pacific Gas & Electric Company (“PG&E”). Marginal transmission costs are used by the Commission for a variety of jurisdictional ratemaking and program evaluation purposes, notwithstanding that retail transmission rates are set by the Federal Energy Regulatory Commission (“FERC”). Accordingly, the issue is within scope.

Cal Advocates also attempts to rebut the accuracy of SEIA’s MTCC proposal, arguing that it is not cost-based, as well as making additional procedural arguments against the proposal. As illustrated below, the Commission should afford them no weight as they are based on misunderstandings of SEIA’s evidence and of applicable Commission’s policies and processes.

Finally, portions of Cal Advocates’ Opening Brief are not in compliance with the ALJ’s October 3, 2025 Ruling regarding the briefing schedule and the issues to be briefed. Accordingly, these portions of Cal Advocate’s Opening Brief should be afforded no weight.

II. THE COMMISSION SHOULD REJECT SCE’S TOU-D PRIME PLUS RATE PROPOSAL

In support of its TOU-D PRIME Plus rate proposal SCE advances several arguments.¹ These arguments, however, have already been addressed and rebutted by SEIA and Cal

¹ *Opening Brief of Southern California Edison Company*, A. 24-03-019 (November 3, 2025) (“SCE Brief”), pp. 3-7.

Advocates in their Opening Briefs.² SEIA will not reargue these points, but will provide the Commission with a roadmap to where the arguments raised by SCE have been refuted.

SCE argues that it “revised the PRIME Plus proposal in supplemental testimony to be consistent with Decision (D.) 24-05-028, which was issued after SCE filed direct testimony.”³ But, as shown by SEIA, the fixed charge component of SCE’s TOU-D Prime Plus proposal, which was the only component changed in the supplemental testimony, is inconsistent with both applicable law and the Commission’s interpretation of that law in D. 24-05-028.⁴

SCE also argues that the demand charge element of its proposed TOU-D PRIME Plus rate “more closely resembles non-residential rates with demand charges, which have proven to be effective in adjusting customer behavior and establishing a base load pattern to relieve resource and grid constraints.”⁵ SEIA, however, highlighted the fallacy of this argument, which fails to account for the differences between serving residential and non-residential loads.⁶

SCE advances the notion that the inclusion of an on-peak demand charge in its TOU-D PRIME Plus proposal provides substantial incentive for customers to change behavior and shift usage away from peak periods.⁷ But, as demonstrated by SEIA and Cal Advocates, the opposite is more likely true.⁸ While SCE’s proposed demand charge does make a customer’s maximum 60-minute usage every month highly consequential for the customer’s bill, it also removes much

² *Opening Brief of the Solar Energy Industries Association*, A. 24-03-019 (November 3, 2025 (“SEIA Brief”), pp.2-7; *Office of the Public Advocates Opening Brief*, A. 24-03-019 (November 3, 2025 (“Cal Advocates Brief”), pp. 2-6.

³ SCE Brief, p. 2.

⁴ SEIA Brief, pp. 2-4.

⁵ SCE Brief, p. 3.

⁶ SEIA Brief, p. 5.

⁷ SCE Brief, p. 4.

⁸ SEIA Brief, pp. 6-7; Cal Advocates Brief, pp. 3-4.

of the incentive for the customer to use less than this maximum in any other 60-minute period. SCE claims to have “performed analysis that demonstrates PRIME customers shift usage away from peak periods at a higher rate than customers on the default TOU rate” and claims that “PRIME Plus will further these reductions in load.”⁹ However, as demonstrated by Cal Advocates, this assertion is speculative and not supported by any empirical evidence. SCE “simply assumes that because customers on the TOU-D-Prime rate demonstrated significant load shifting compared to default TOU rates, even greater load shift can be demonstrated with the new TOU-D-PRIME Plus option.”¹⁰ Indeed, SCE admits as much.¹¹

Similarly, SCE argues that TOU-D-PRIME Plus is the “best rate design option to further incentivize residential customers to shift off peak usage.”¹² Setting aside the fact that declaring a rate that has not been implemented as the “best” option for anything is somewhat premature, there are other proven designs such as critical peak pricing (“CPP”) which also focus on load shifting. CPP rates feature very high volumetric on-peak rates on days when demand is very high, which, as noted above, is exactly the structure that SCE points to as achieving enhanced demand reduction. CPP rates are more accurate and targeted, focusing scarce customer attention on the days when demand reductions really matter. They do not require either a fixed charge that does not comply with Commission policy or a demand charge that is not cost-based.¹³

Finally, SCE discounts concerns about customer understanding of the rate, noting that the rate is optional. But the fact that it is optional does not diminish the need for customers who are

⁹ SCE Brief, p. 4.

¹⁰ Cal Advocates Brief, p. 5.

¹¹ SCE Brief, p. 4.

¹² *Id.*, p. 5.

¹³ SEIA Brief, pp. 5-6.

considering the rate to understand it.¹⁴ All that SCE has to say on this account is:

Unlike other utilities in the United States, the California IOUs are uniquely positioned to educate customers on new optional rate structures due to the unprecedented undertaking of transitioning millions of residential customers to TOU rates and, more recently, the communication effort to launch the BSC.¹⁵

While this might be true, the introduction of a residential demand charge is a new, different, and even more complex undertaking. SCE has not provided anything on the record of this proceeding regarding the education and outreach plan which will be used to facilitate customers' understanding of the PRIME Plus rate proposal.¹⁶

In sum, SCE's arguments, when reviewed in light of the record of this proceeding, do not support a determination by the Commission that the PRIME Plus rate proposal is just and reasonable. Accordingly, it must be rejected.

III. THE COMMISSION SHOULD ADOPT SEIA'S RECOMMENDED MARGINAL TRANSMISSION CAPACITY COSTS

In this proceeding, SEIA has proposed Commission adoption of marginal transmission capacity costs for SCE. To that end, using two different methodologies, SEIA calculated SCE's MTCCs and placed that information on the record. No other party, including SCE, presented an alternative to SEIA's proposed MTCC value, and no party submitted rebuttal testimony addressing SEIA's proposal. Now, in briefing, both SCE and Cal Advocates argue in opposition to Commission adoption of an MTCC for SCE. While SCE relies solely on the argument that this issue is out of scope, Cal Advocates also advance arguments that SEIA's proposed MTCCs are not cost-based, are premature, and are an attempt to modify an approved methodology for

¹⁴ *Id.*, pp. 7-8.

¹⁵ SCE Brief, p. 7.

¹⁶ SEIA Brief, p. 8.

calculating MTCCs. As demonstrated below, none of these arguments have merit.

A. Consideration of SCE's MTCCs is Within the Scope of this Proceeding

1. Adoption of MTCCs

SCE argues that determination of its marginal transmission capacity costs is out of scope in a GRC Phase 2 proceeding, and that this issue is properly determined by the FERC, which has jurisdiction over SCE's retail transmission rates.¹⁷ SCE is wrong. The determination of an IOU's MTCC has previously occurred in a GRC Phase 2 proceeding and there is no jurisdictional preclusion that prevents the Commission from doing so again.

Thus, in application A.19-11-019, Pacific Gas & Electric Company ("PG&E") requested that the Commission set a value for its MTCC, noting that such was necessary for setting marginal cost-based price floors under its Tariff 31 and for use in other proceedings where an MTCC estimate may be needed.¹⁸ The Commission did so.¹⁹ SEIA has presented the same rationale here for the adoption of MTCCs for SCE - i.e., the Commission's increasing use of marginal transmission capacity costs in state-jurisdictional ratemaking.²⁰

SCE also asserts that, because the Commission is addressing transmission rate design in the IOUs' Dynamic Rate Applications, "SEIA's request to address transmission rates in this proceeding is unnecessary and will create additional complications if adopted."²¹ Cal Advocates raises a similar argument.²² But SEIA is not advocating for the Commission's adoption of transmission rates or even for the Commission to address transmission rate design conceptually.

¹⁷ SCE Brief, p. 10.

¹⁸ See Decision 21-11-016, p. 65.

¹⁹ *Id.*

²⁰ See, in general, Exhibit SEIA-01, pp. 20-21.

²¹ SCE Brief, p. 11.

²² Cal Advocates Brief, p. 10.

Instead, SEIA's advocacy is limited to the adoption of SCE's MTCC. As set forth in SEIA's testimony, and as recognized by PG&E in its last GRC, the Commission is utilizing MTCCs in other rate proceedings, including for marginal price floors and in updates to the Avoided Cost Calculator ("ACC"). Indeed, SCE acknowledged the importance of knowing its marginal transmission costs when it presented its calculation of such costs in its last GRC Phase 2, stating that its calculation "is a first step towards establishing a basis of marginal costs that can be used to better inform the design of retail transmission rates."²³ Thus, in the past SCE recognized not only that the MTCC is useful for state-jurisdictional purposes, but also might be important at the federal level for re-designing its retail transmission rates.

Moreover, Cal Advocates' concern that approval of SEIA's MTCC proposal "could result in multiple approved MTCCs for SCE that vary depending on the end use"²⁴ is misplaced and speculative. The Commission should strive for consistency and accuracy of rate components by employing the same methodology for calculating those components irrespective of the Commission proceeding in which they are used. As discussed in SEIA's testimony, SEIA has calculated SCE's MTCC using the Commission's currently-approved Discounted Total Investment Method ("DTIM").²⁵

Consideration of SCE's MTCC is not out of scope for this proceeding. Adoption of SEIA's proposed MTCC will contribute to the accuracy of SCE's future rates and will ensure that an updated MTCC for SCE is available for the multiple proceedings in which it may be used.

2. Adoption of Time Differentiated Transmission Rates

Cal Advocates argues that SEIA's testimony on a time-differentiated retail transmission

²³ Exhibit SEIA-01, p. 22 lines 3-6 citing A. 20-10-012, Exh. SCE-02, at p. 7 and Appendix F.

²⁴ Cal Advocates Brief, p. 10.

²⁵ Exhibit SEIA-01, p. 22 lines 13-21, citing D. 20-04-010.

rate is out of scope and should be given no weight.²⁶ Cal Advocates misunderstands the purpose of SEIA's testimony in this regard.

Specifically, SEIA prefaced its remarks regarding necessary changes to SCE's transmission rate design with the following:

SEIA reiterates that it is not proposing that the Commission should do anything about the design of SCE's FERC transmission rates in this case, unless, in the context of a settlement in this case, the Commission is presented with a proposal from the parties that includes commitments from SCE to take certain actions before the FERC on the design of its transmission rates.²⁷

As Cal Advocates is aware, the Commission represents the ratepayers of California in transmission rate cases before the FERC. SEIA's remarks regarding SCE transmission rate design were the sole purpose of providing the Commission with input to potentially to be used in the Commission's advocacy before the FERC. As SEIA stated

California rate design proceedings such as this one are logical public forums in which knowledgeable and interested parties should be encouraged to provide input to the CPUC on FERC transmission rate design, and in particular on the impacts which FERC rate design may have on the design of CPUC jurisdictional rates, and vice versa.²⁸

B. SEIA's Proposed MTCC Aligns with Actual Costs

Cal Advocates also criticizes SEIA's MTCC of \$73 per kW-year as "inflated" based on a misreading of footnote 119 on page 65 of SEIA's testimony.²⁹ That footnote observes that, if customers were billed this marginal transmission cost based on their coincident peak demand, then SCE would recover \$1.75 billion in marginal transmission revenues each year, which exceeds SCE's embedded cost transmission revenue requirement of \$1.4 billion per year. The

²⁶ *Id.*, p. 12.

²⁷ Exhibit SEIA-01, p. 63 lines 4-8.

²⁸ *Id.*, p. 62, lines 21-25.

²⁹ Cal Advocates Brief, pp. 8-9.

purpose of this footnote was to make the point that a substantial portion of SCE's transmission costs are peak-related. Cal Advocates, however, asserts that this comparison shows that SEIA's MTCC must be inflated, because, according to Cal Advocates "the Commission-adopted MTCC in the ACC relies on SCE's actual FERC-approved transmission revenue requirement of approximately \$1.4 billion per year."³⁰ Cal Advocates provides no cite to this assertion. Even a cursory inspection of the DTIM method for calculating avoided transmission costs shows that the calculation does not use and has nothing to do with the overall \$1.4 billion transmission revenue requirement. The DTIM calculates the MTCC by using the discounted future capital costs of the subset of future transmission projects needed to add capacity, divided by the capacity added. The resulting \$ per kW marginal cost of transmission is then annualized with a real economic carrying charge, and adders for general plant and O&M costs are included.³¹ There is nothing inherently wrong with marginal transmission costs exceeding embedded costs as Cal Advocates implies. It is a common feature in the Commission's use of marginal cost for ratemaking that marginal cost revenues do not equal the embedded cost revenue requirement. Indeed, the fact that marginal transmission costs are higher than average embedded transmission costs explains why SCE's transmission rates have increased rapidly in recent years. Each new marginal kW of demand is adding an above-average amount to SCE's overall transmission revenue requirement, causing the average SCE transmission rate to increase. Cal Advocates argument fails to understand both how the DTIM works and the basic role of marginal costs in CPUC ratemaking.

³⁰ Cal Advocates Brief, p. 8.

³¹ See the documentation for the 2024 ACC, at pp. 48-49 and 81-89, especially Tables 12-4 to 12-11, available at https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/demand-side-management/acc-models-latest-version/2024-acc-documentation-v1b_clean_posted_nowm.pdf

C. SEIA's Proposal Is Not Premature

Cal Advocates argues that it would be “premature” to adopt SEIA’s MTCC in this proceeding, because the Commission has commissioned a study of the methodologies for determining avoided transmission and distribution costs (“Avoided T&D Study”) used in the ACC.³² That study is now underway. However, that study is intended to inform the 2028 update of the ACC, at the earliest.³³ Cal Advocates ignores the immediate need for an up-to-date value for SCE’s marginal transmission costs for use in the 2026 ACC update that will occur next year. Further, the Avoided T&D Study is just a study that will present one consultant’s views – it is not guaranteed to result in a change to the present methodology for determining avoided transmission costs that somehow would render obsolete the continued use of the currently-approved DTIM until the study is finished and reviewed. Cal Advocates takes this argument to an absurd extreme, arguing that any adoption of a new MTCC while the study is ongoing “would call into question the prudence and purpose of the Commission’s decision to allow \$1.5 million in ratepayer funds to be spent on the T&D Study.”³⁴ Contrary to the picture that Cal Advocates tries to paint, the ACC is not standing still until the Avoided T&D Study is complete, and the Commission has an immediate need for an updated MTCC for SCE for use in the 2026 ACC update process. SEIA’s well-supported use of the currently-approved methodology to calculate the SCE MTCC in this case fits that purpose in an exact and timely fashion.

³² Cal Advocates Brief, p. 9.

³³ See CPUC Webinar Presentation *Avoided Transmission and Distribution Costs Study - Draft Research Plans* (August 22, 2025), slide 47 available at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/energy-efficiency/ider-cost-effectiveness/td-study-webinar-slide-deck.pdf>

³⁴ Cal Advocates Brief, p. 9.

D. SEIA's MTCC Proposal Does Not Modify the ACC Methodology

In advancing its MTCC proposal, SEIA calculated SEIA's MTCCs using two methodologies – the DTIM which has been approved by the Commission for use in the ACC and the NERA regression method, which SCE uses to calculate marginal distribution costs. The results of both methodologies produced MTCCs which were within \$2.00 per kW year of each other, thereby validating the accuracy of SEIA's calculations.³⁵ Cal Advocates, however, attempts to undermine SEIA's analysis by asserting that, as executed by SEIA, the DTIM does not conform to the transmission cost methodology approved by the Commission for use in the ACC.³⁶ Based on that assertion, Cal Advocates argues that “[the Commission should not allow SEIA to introduce ad hoc changes in this proceeding that would circumvent procedural safeguards and create inconsistent avoided-cost values across proceedings.”³⁷ Cal Advocates' assertions regarding the DTIM performed by SEIA, as well as the arguments supporting those assertions misconstrue SEIA's testimony as well as Commission decisions and resolutions addressing the ACC.

First, SEIA made no changes to the DTIM methodology.³⁸ While Cal Advocates cites to page 30 SEIA's testimony (Exhibit SEIA-01) for this erroneous assertion,³⁹ a review of that page reveals that it is addressing methodologies for calculating marginal customer access costs, not the MTCC.

Moreover, while SEIA did update the data to include the costs of the SCE reliability-

³⁵ See Exhibit SEIA-01, pp. 22-23.

³⁶ Cal Advocates Brief, p. 10.

³⁷ *Id.*, p. 11.

³⁸ Exhibit SEIA-01, p. 22.

³⁹ Cal Advocates Brief, p. 10, footnote 43.

related transmission projects approved by the California Independent System Operator (“CAISO”) in May 2024 for the 2023-2024 Transmission Plan, the use of such up-to-date data has not been rejected by the Commission as implied by Cal Advocates. Specifically, Cal Advocates alleges that “SEIA’s unilateral substitution of new [CAISO] data” was contrary to D. 24-08-007 where “the Commission already declined to adopt a similar transmission cost proposal” and to Resolution E-5328 which “declined to update avoided transmission costs in the 2024 ACC cycle.”⁴⁰ Again, Cal Advocates’ citations are questionable. With respect to Cal Advocates’ first assertion regarding SEIA’s use of the updated data being rejected by the Commission in Decision 24-08-007, Cal Advocates cites page 53-56 of that decision. But those pages are addressing a number of parties’ comments on the underlying proposed decision. The only applicable paragraph on those pages related to updating transmission costs for the purposes of calculating MTCCs states:

Additionally, Clean Coalition and SEIA raise concerns for using the transmission cost data from data responses provided by the Joint Utilities. SEIA notes that the proposed decision does not address the specific cost data to be used to update the avoided transmission costs and avoided distribution costs for the 2024 ACC. ***The specific cost data that will be used to calculate the avoided T&D costs in the 2024 ACC are determined through the staff resolution process that approves the 2024 ACC and are not addressed in this proceeding***.⁴¹

Thus, the Commission did not object to the use of updated transmission cost data in determining the MTCCs for use in the ACC as implied by Cal Advocates but rather asserted that such should be addressed in the resolution process. In that resolution process, as even Cal Advocates appears to concede, the Commission did not object to the use of the updated data but rather provided that:

While the Energy Division recognizes the benefit generally of using the most recent data available, given the time constraints for approval of the 2024 ACC, it is not feasible for the avoided transmission costs to be revised at this time while

⁴⁰ *Id.*, p. 11.

⁴¹ Decision 24-8-007, p. 55 (emphasis added).

also providing all parties with a fair opportunity to review and comment on potential changes to inputs and underlying methodology.⁴²

As stated above, SEIA made no changes to the DTIM methodology. Cal Advocates had a “fair opportunity” throughout this GRC Phase 2 proceeding “to review and provide comment” on the updated transmission cost data SEIA utilized in its calculation of SCE’s MTCC. As SEIA testified, the time constraints experienced in the 2024 ACC update process underscored the importance of being able to litigate these marginal costs in a proceeding such as a GRC Phase 2 that is not time-constrained.⁴³

Finally, as noted above, even if the Commission were to determine that SEIA’s use of updated data in the DTIM was, in effect, a change in methodology which should be addressed in the ACC proceeding, SEIA also calculated SCE’s MTCCs using the NERA regression methodology – another well-accepted approach that SCE uses to calculate its marginal distribution costs. The Commission could adopt the result of that calculation – the very similar \$75 per kW-year - as SCE’s MTCC.

IV. PORTIONS OF CAL ADVOCATES’ BRIEF SHOULD BE AFFORDED NO WEIGHT

On October 3, 2025, the presiding ALJ issued an e-mail ruling setting the briefing schedule and the issues to be briefed (“October 3 Ruling”). Specifically, the ALJ ruled that “[b]riefs are limited to the remaining contested issues in the proceeding with no briefing permitted on the Load Factor Based Rate Option Proposal.”⁴⁴ The remaining contested issues, as delineated in the Updated Joint Case Management Statement, of which Cal Advocates was a

⁴² See CalPA Brief, p. 11, footnote 47 citing Resolution E-5328, p. 11 (emphasis added).

⁴³ Exhibit SEIA-01, p. 21, lines 1-3.

⁴⁴ *Email Ruling Setting Briefing Schedule and Granting Party Status*, A. 24-03-019 (October 3, 2025), available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M581/K736/581736460.PDF>

joint filer, were listed as: (1) SCE’s PRIME Plus proposal, (2) TURN’s proposal to increase the baseline allowance, and (3) SEIA’s proposal regarding transmission marginal costs.⁴⁵ Despite the clear directions of the ALJ, Cal Advocates references its opposition to the Vehicle-to-Grid Rate Proposal (“VGRP”) Settlement Agreement in the introduction to its brief as well as dedicating a section of its brief to this opposition. In both places Cal Advocates reemphasizes its position that the Commission should reject the Settlement Agreement’s proposed use of the ACC to determine VGRP export credits.⁴⁶ These portions of the Cal Advocates Brief are not in compliance with the October 3 Ruling and should be ignored and provided no weight in the Commission’s deliberations on the VGRP Settlement Agreement.

Similarly, despite the October 3 Ruling that no briefing would be permitted on the Load Factor Based Rate Option Proposal, Cal Advocates includes in its Brief an extensive footnote reiterating its objection to the Load Factor Based Rate Option Proposal and its recommendation regarding an alternative to its adoption.⁴⁷ Again, this portion of the Cal Advocates Brief is not in Compliance with the October 3 Ruling and should be ignored and provided no weight in the Commission's consideration of the Electric Vehicle Rate Design Settlement.

Respectfully submitted the 24th day of November 2025 at San Francisco, California

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⁴⁵ *Updated Joint Case Management Statement*, A. 24-03-019 (October 2, 2025), p. 2, available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M581/K723/581723304.PDF>

46 Cal Advocate's Brief, p. 1 and p. 13.

⁴⁷ *Id.*, p. 2., footnote 3.