

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of Southern California Edison
Company (U338E) for Authorization to
Deploy Advanced Metering Infrastructure
2.0 and for Associated Cost Recovery.

Application 26-03-030

**PROTEST OF THE PUBLIC ADVOCATES OFFICE
TO THE APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY
(U 338-E) FOR AUTHORIZATION TO DEPLOY ADVANCED METERING
INFRASTRUCTURE 2.0 AND FOR ASSOCIATED COST RECOVERY**

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I. INTRODUCTION

Pursuant to Rule 2.6 (a)¹ of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure (Rules), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits this protest to Southern California Edison Company's (SCE) Application (A.) 26-03-030, *Application of Southern California Edison Company (U338E) for Authorization to Deploy Advanced Metering Infrastructure 2.0 and for Associated Cost Recovery.*²

Cal Advocates has a statutory obligation to represent and advocate on behalf of the interests of public utility customers before the Commission.³ Cal Advocates' mission is to obtain the lowest possible rate for service consistent with safe and reliable service levels, and the state's environmental goals.

¹ Rule 2.6(a) provides that a protest to an application must be filed within 30 days of the date the notice of the filing of the application first appears in the Commission's Daily Calendar.

² SCE filed its application on March 26, 2026. Notice of the filing of the Application first appeared in the Commission's Daily Calendar on March 30, 2026. Pursuant to Rule 1.15, this protest is timely filed.

³ See Pub. Util. Code section 309.5.

II. BACKGROUND

SCE'S application seeks to recover \$1,865 million from its customers for approximately 5.7 million AMI 2.0 meters⁴ and associated software and communications systems across its service area. SCE proposes a multi-year deployment to replace the AMI 1.0 generation of meters with AMI 2.0 meters and implement the corresponding communications, network, and support systems. Under SCE's proposal, small-scale deployment would commence in late 2028 to validate meter performance, network readiness, and field installation processes. Mass deployment would follow from 2029 through 2033.

SCE proposes to establish an AMI 2.0 Memorandum Account effective as of the filing date of this application. Then, if and when the Commission issues a final decision resolving this application, the amounts in the AMI 2.0 Memorandum Account would be transferred to a two-way AMI 2.0 Balancing Account.

In this application alone, SCE seeks Commission authorization to charge its ratepayers over \$1.8 *billion* dollars outside of its next General Rate Case (GRC). SCE's next GRC is expected to file in 2027 and will establish SCE's forecast of operations and maintenance (O&M) and capital costs from 2029 to 2032. SCE's deployment period spans four out of the five years of SCE's request. These years are well within the budgetary timeframe of SCE's Test Year 2029 GRC.

III. PRELIMINARY IDENTIFICATION OF SUBSTANTIVE ISSUES

SCE's Application presents two distinct proposals. First, SCE proposes a multi-year deployment to replace the AMI 1.0 generation of meters with AMI 2.0 meters and implement the corresponding communications network. Second, SCE proposes to establish an AMI 2.0 Memorandum Account effective as of the filing date of this application and then transfer those amounts to a two-way AMI 2.0 Balancing Account. SCE identifies five issues to consider in review of its Application:

⁴ These 5.7 million meters would replace approximately 5.4 million AMI 1.0 meters and add 300,000 new meters.

- (1) Whether the Commission should authorize SCE to implement a multi-year program to replace the current “AMI 1.0” meters with a new generation of “AMI 2.0” meter;
- (2) Whether SCE’s AMI 2.0 proposal (a) is cost-effective and will provide lasting value to customers; (b) is based on a reasonable business case and deployment plan; (c) reflects a reasonable technology choice based on AMI technologies available on the market; and (d) is aligned with State energy policy objectives;
- (3) Whether the costs to be recovered in rates from customers to fund the deployment of AMI 2.0 are just and reasonable in compliance with Public Utilities Code Section 451;
- (4) If the Commission grants the application, what follow-up measures should the Commission order, such as advice letters and customer outreach;
- (5) Relevant safety considerations: SCE does not anticipate that replacement of AMI 1.0 meters with AMI 2.0 meters and related infrastructure and operational changes will result in any adverse safety impacts on facilities or operations.

Cal Advocates’ preliminary review of PG&E’s Application has identified the following additional issues for consideration in this proceeding:

- (6) Whether SCE should be authorized to establish an AMI 2.0 Memorandum Accounts to track, record, and recover actual AMI 2.0 costs and a Balancing Account into which to transfer amounts recorded in the AMI 2.0 Memorandum Account;
- (7) Whether the circumstances are caused by an event outside of SCE’s control;
- (8) Whether the O&M and capital costs were reasonably foreseeable as part of SCE’s Test Year 2025 GRC;
- (9) Whether the O&M and capital costs are reasonably foreseeable and able to be included in SCE’s Test Year 2029 GRC, which SCE is expected to file in May 2027;
- (10) Whether ratepayers will benefit from the financial relief provided to SCE by allowing memorandum account treatment.

Cal Advocates anticipates that other issues may arise in the course of discovery and will modify or supplement the issues listed above as necessary.

IV. CATEGORIZATION, NEED FOR HEARING, AND PROPOSED SCHEDULE

A. CATEGORIZATION

This proceeding has been preliminarily categorized as “ratesetting” consistent with SCE’s proposed designation. Cal Advocates agrees that this proceeding should be categorized as ratesetting.

B. NEED FOR HEARINGS

Based on a review of SCE’s Application and supporting testimony, Cal Advocates believes evidentiary hearings may be necessary. Therefore, Cal Advocates recommends that evidentiary hearings be included in the proceeding schedule.

C. SCHEDULE

SCE’s proposed schedule does not provide sufficient time for the development of intervenor testimony and potential evidentiary hearings. The Commission should reject SCE’s proposed date of October 2026 for intervenor testimony. Cal Advocates requests that the Commission adopt a schedule that provides all parties adequate time to evaluate SCE’s requests. Cal Advocates will need more time to conduct its analysis and review and prepare and serve its testimony. Cal Advocates will be prepared to propose a schedule at the prehearing conference after it has had additional time to review SCE’s Application.

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V. CONCLUSION

Cal Advocates respectfully requests that the Commission adopt a procedural schedule that provides reasonable time for all parties to evaluate and make recommendations regarding SCE's proposals. Cal Advocates also requests that the scope of the proceeding include the issues identified in this protest and that the categorization of this proceeding be ratesetting.

Respectfully submitted,

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