



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

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Application of Southern California Edison
Company (U 338-E) for Authority to Recover
Costs, Amongst Other Things, to its Class C
Water Utility and Smaller Gas Utility

A.26-03-003

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 388-E) RESPONSE TO MOTION
OF THE PUBLIC ADVOCATES OFFICE TO CONSOLIDATE THE APPLICATIONS
OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)**

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Dated: **June 19, 2026**

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OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)**

Pursuant to Rules 7.4 and 11.1(e) of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully files this response to the motion for consolidation (motion) filed by the Public Advocates Office (Cal Advocates). Cal Advocates filed its motion on June 18, 2026. Thus, this response is being filed the day after the motion was filed.

Pursuant to the guidance provided by the Administrative Law Judge during the Prehearing Conference in this docket, SCE responds by attaching the substantive reply that SCE filed in the docket (A.26-04-017) where Cal Advocates first raised the issue of consolidation. Cal Advocates did so via its protest to SCE's application in docket A.26-04-017. Thus, SCE substantively responded to Cal Advocates' arguments in SCE's reply to protest. SCE's attached reply to protest is incorporated by reference into this response to motion.

SCE concludes with one important point. Despite the grounds that SCE has presented that consolidation is not warranted, if the Commission is inclined to consolidate the two proceedings, then the Commission should do so as follows: the Commission should have the proceedings be processed via this docket A.26-03-003 and with Administrative Law Judge Long presiding. This proceeding is ratesetting, and requests modifications to customer rates. The other proceeding is

not ratesetting and does not seek any adjustments to customer rates. Moreover, customers received notice of the potential rate changes via this docket, with the notices prominently featuring this docket.

Respectfully submitted,

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/s/ Kris G. Vyas

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June 19, 2026

Attachment A

SCE's Reply to Protest in A.26-04-017

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

Application of Southern California Edison
Company (U 338-E) for Authority To, Revise
and Increase the Safe Annual Yield, Revise
Rule 3, and Allocate Water Per a Special
Agreement for its Class C Water Utility

Application 26-04-017

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY TO PROTEST

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Dated: **June 15, 2026**

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

Application of Southern California Edison
Company (U 338-E) for Authority To, Revise
and Increase the Safe Annual Yield, Revise
Rule 3, and Allocate Water Per a Special
Agreement for its Class C Water Utility

Application 26-04-017

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY TO PROTEST

I.

INTRODUCTION

Pursuant to Rule 2.6(e) of the California Public Utilities Commission's (CPUC or Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully replies to the Protest filed by the California Public Advocates Office (Cal Advocates) on June 5, 2026.¹

II.

SCE'S REPLY TO CAL ADVOCATES' PROTEST

Cal Advocates suggests that this docket be consolidated with A.26-03-003.² As part of its proposed consolidation, Cal Advocates also requests that this proceeding be classified as ratesetting and adopt the interim procedural schedule set in A.26-03-003 pursuant to Administrative Law Judge (ALJ) Douglas M. Long's April 24, 2026 Email Ruling Setting a Prehearing Conference And An Interim Procedural Schedule.³ For the reasons discussed below, SCE opposes consolidating this proceeding with A.26-03-003 and also opposes classifying this proceeding as ratesetting.⁴

¹ As of the date of this Reply, to SCE's knowledge, Cal Advocates was the only stakeholder that submitted a Protest to SCE's Application.

² Cal Advocates Protest, pp. 2-3.

³ Cal Advocates Protest, pp. 3-5.

⁴ A prehearing conference is occurring in A.26-03-003 on June 16, 2026.

A. A.26-03-003 and A.26-04-017 Do Not Have Closely Related Questions of Law and Fact

In its proposed consolidation, Cal Advocates asserts there are closely related questions of law and fact for this Application and A.26-03-003.⁵ However, Cal Advocates is mistaken as to the scope of SCE's request in A.26-03-003. SCE's application in that docket to recover costs recorded to memorandum accounts for SCE Water and Gas utilities has no relation to SCE's contract- and tariff-based request in the instant application.⁶ None of the costs SCE is requesting cost recovery for in A.26-03-003 have any relationship regarding, overlap with, or connection to the issues in this Application.

In this Application, SCE is not seeking *any* cost recovery. Instead, SCE is seeking approval: (1) to increase the Safe Annual Yield (SAY) of the Middle Ranch, Avalon, and Toyon Integrated Fresh Water System (MRAT Water System); (2) of a water allocation to the Santa Catalina Island Company (SCICO) for land rights and a monetary contribution under a Commission-approved existing tariff; and (3) of revisions to SCE Water's tariff Rule 3 Water Requirement Factors.

Cal Advocates asserts that this proceeding should evaluate the reasonableness of SCE's proposed capital treatment under the Special Agreement and SCE's requested cost recovery request in A.26-03-003 in tandem.⁷ This assertion is misplaced.

First, SCE is not seeking reasonableness review of the capital costs for the Desalination Enhancements Phase 1 (Desal Enhancements) project in this application. In fact, the Commission has already evaluated and authorized cost recovery for the Desal Enhancements project forecast capital costs in D.23-12-007. There, the Commission approved the Desal Enhancements project.⁸ Differences between forecast and recorded costs for the Desal Enhancements project will be addressed in the next General Rate Case (GRC) or through a future rate base offset advice letter filing,⁹ consistent with all forecast capital costs that receive approval decisions in an SCE Water GRC.

⁵ Cal Advocates Protest, pp. 3-5.

⁶ A.26-03-003, pp. 1-5.

⁷ Cal Advocates Protest, p. 3.

⁸ D.23-12-007, Finding of Fact 66 and Conclusions of Law 42 and 43, at pp. 89 and 96.

⁹ Standard Practice U-27-W, Section E, part 46, p. 11.

Second, SCE is seeking reasonableness review of the Special Agreement that would grant the SCICO a water allocation in exchange for (a) a financial contribution of up to \$500,000 and (b) temporary and permanent access and easement rights to certain SCICo-owned real property that are necessary for SCE to construct and operate the Desal Enhancements project. If the Commission approves the Special Agreement, the Desal Enhancement project's capital costs will be reduced in the next GRC, compared to if the Commission does not approve the Special Agreement. While the capital costs for the Desal Enhancement project can change as a result of this Application, SCE is *not* seeking reasonableness review or cost recovery of the capital costs for the Desal Enhancements project.

Finally, SCE is not seeking any customer rate adjustments in this proceeding. For these reasons, the Commission should reject Cal Advocates' proposal to consolidate this application with A.26-03-003.

B. A.26-04-017 Should be Categorized as Quasi-Legislative

Cal Advocates asserts that this proceeding should be categorized as ratesetting because, in its view, this Application and A.26-03-003 contain issues of fact and law that are closely related.¹⁰ In other words, Cal Advocates' view is that the classification of that other rate recovery proceeding should control the classification of this proceeding where no rate recovery is at issue. That is not how proceeding categorization works under the Commission's rules. SCE's request in this Application does not seek any rate changes. And as explained above, there are no closely related issues of fact and law between this proceeding and A.26-03-003. As such, A.26-04-017 should be categorized as quasi-legislative.

C. The Commission Should Adopt SCE's Proposed Procedural Schedule

Cal Advocates proposes that the Commission adopt ALJ Long's interim procedural schedule in A.26-03-003 as the schedule for this proceeding.¹¹ SCE opposes consolidating this application with A.26-03-003 and as such opposes Cal Advocates' proposed procedural schedule here. SCE's proposed

¹⁰ Cal Advocates Protest, p. 3.

¹¹ Cal Advocates Protest, pp. 3-5.

procedural schedule in the instant docket provides Cal Advocates ample time to conduct thorough analyses, propound discovery, serve testimony, and identify material disputed issues of fact (if any) that may necessitate evidentiary hearings. As such, the Commission should adopt SCE's proposed procedural schedule.

III.

CONCLUSION

SCE appreciates the opportunity to submit this Reply to Cal Advocates' Protest and respectfully requests that SCE's recommendations be reflected in the Scoping Memo for this proceeding.

Respectfully submitted,

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