



FILED

08/24/26

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C2608011

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

Balmoral Realty

Complainant,

vs.

Southern California Edison Company (U338E)

Defendant.

Case (C.) _____

Complaint

COMPLAINANT	DEFENDANT (Include Utility "U-Number," if known)
Balmoral Realty through Charles Clydsdale, Chief Executive Officer / Authorized Representative 8718 Yorktown Ave Los Angeles, CA 90045 Telephone: 310-754-0690 Email: cc@coho.la	Southern California Edison Company (U338E) Attn: Anna Valdborg, Director & Managing Attorney 2244 Walnut Grove Avenue Rosemead, CA 91770 Telephone: 626-302-6008 Email 1: Anna.Valdborg@sce.com Email 2: case.admin@sce.com Email 3: AdviceTariffManager@sce.com

(Internal Use Only)

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

(C2) Additional complainant(s) (Provide name, address, phone number and email address for each complainant)

Name of Complainant	
Address	
Daytime Phone Number	
Email Address	

☒ One/sole complainant is representative listed in Box C-1

☐ Additional complainants listed in attachment

(D2) Additional Defendant(s) (Provide name, address, phone number and email address for each defendant)

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

(E) INFORMAL RESOLUTION / CUSTOMER STATUS

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?

☒ YES ☐ NO

Has staff responded to your complaint?

☒ YES ☐ NO

Did you appeal to the Consumer Affairs Manager?

☒ YES ☐ NO

Do you have money on deposit with the Commission?

☐ YES ☒ NO

Amount \$0

Is your service now disconnected?

☐ YES ☒ NO

 Related CAB File No. 702476;
 SCE correction/records requests followed.

(F) Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

See Attachment A. SCE's June 8, 2026 Personal Information Report proves that SCE maintained internally inconsistent or inaccurate address fields for this account: it lists 'Home Unit Number' as 2640 (the street number), and its Service Address table lists 2640 LINCOLN BLVD but contains no unit field. Yet SCE's consolidated bill identifies the same service location as UNIT 2B. CPA's notice and vendor affidavit omitted Unit 2B. CPA later stated by telephone that it used a separate mailing address supplied by SCE that lacked Unit 2B. This complaint asks the Commission to adjudicate SCE's own data-maintenance and, on information and belief, data-transmission acts. It does not ask the Commission to adjudicate CPA's independent notice obligations.

(G) SCOPING MEMO INFORMATION (Rule 4.2(a))

- (1) Proposed category: ☒ adjudicatory ☐ ratesetting
- (2) Are hearings needed (are there facts in dispute)? ☒ YES ☐ NO
- (3) Complaint type: ☒ Regular Complaint ☐ Expedited Complaint (Rule 4.6)
- (4) The issues to be considered are:

1. Whether SCE maintained inaccurate or internally inconsistent address data for Unit #2B.
2. Whether SCE disclosed or transmitted a no-unit mailing/notice address to CPA.
3. Whether SCE violated Public Utilities Code sections 451 and 366.2(c)(9).
4. What address-history, transmission, call-setup, and correction records SCE must produce.
5. What account correction, bill credit/refund, interest, and other relief should be ordered.

(5) Proposed schedule for resolving this adjudicatory complaint:

Prehearing Conference: approximately 30 to 40 days after acceptance for filing.

Hearing: approximately 50 to 70 days after acceptance for filing.

Prehearing Conference: 30-40 days after acceptance

Hearing: 50-70 days after acceptance

The undersigned proposes no schedule materially different from the form guidelines.

(H) WHEREFORE, COMPLAINANT REQUESTS AN ORDER:

See Attachment B. In summary: (1) find that SCE maintained inaccurate or internally inconsistent address data and, if proven, transmitted incomplete data to CPA; (2) order correction of every SCE customer, mailing, notice, and CCA data field so Unit #2B is preserved; (3) order production of the exact SCE-to-CPA address record, audit logs, service-start/call records, and related communications; (4) order SCE to coordinate and implement a bill-level correction for the affected periods; and (5) award any bill credit, refund, reparations, and interest within the Commission's authority. No tort or consequential damages are requested.

(I) OPTIONAL - OPT OUT OF ELECTRONIC SERVICE:

Left blank. Complainant consents to electronic service at cc@coho.la.

(J) Dated at Los Angeles, California, this 6th day of August, 2026

/s/ Charles Clydsdale

Signature of complainant

MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE

(K) REPRESENTATIVE'S INFORMATION

Provide name, address, telephone number, email address, and signature of representative, if any.

Name of Representative: Charles Clydsdale, Chief Executive Officer / Authorized Representative

Address: 8718 Yorktown Ave, Los Angeles, CA 90045

Telephone Number: 310-754-0690

E-mail: cc@coho.la

Signature: /s/ Charles Clydsdale

No attorney or outside representative appears. Charles Clydsdale represents Balmoral Realty and consents to electronic service.

VERIFICATION**(For Individual or Partnerships)**

Not used. The complainant is filing through its chief executive officer / authorized representative.

VERIFICATION (For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters stated on information and belief, and as to those matters I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 6, 2026, at Los Angeles, California

/s/ Charles Clydsdale

Signature of Officer

Chief Executive Officer

Title

(N) NUMBER OF COPIES NEEDED FOR FILING

This complaint is being filed electronically. The current CPUC instructions state that paper copies are not required when a formal complaint is electronically filed.

(O) MAIL PAPER COPIES TO (only if filing on paper)

California Public Utilities Commission
Attn: Docket Office
505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

PRIVACY NOTICE

Whether filed in paper form or electronically, formal complaints filed with the California Public Utilities Commission become public records and may be posted on the CPUC website. Information provided in this complaint, including name, address, city, state, zip code, telephone number, email address, and the facts of the case, may be available online for later public viewing.

Having been so advised, the undersigned consents to the filing of this Formal Complaint.

/s/ Charles Clydsdale

Signature

August 6, 2026

Date

Charles Clydsdale

Print your name

ATTACHMENT A - DETAILED STATEMENT OF COMPLAINT

1. New SCE-specific complaint. This is not a duplicate of the complaint rejected on May 13, 2026. That filing was rejected because the Docket Office understood the dispute as a CPA/vendor notice matter. SCE later produced new evidence from its own customer systems. This complaint challenges SCE's own acts and omissions in maintaining inaccurate address data and, on information and belief, disclosing or transmitting incomplete address data for CCA enrollment and notice purposes.
2. Jurisdiction. SCE is an electrical corporation and public utility subject to Commission jurisdiction. The Commission is not being asked to adjudicate CPA's independent conduct. It is being asked to determine whether SCE maintained, used, disclosed, or transmitted defective customer address data and failed to correct the resulting account harm.
3. Customer and service location. Balmoral Realty was the customer of record for electric service at 2640 Lincoln Blvd, Unit #2B, Santa Monica, California 90405. The property is a multi-unit building with separate mailboxes, including a separate mailbox for Unit 2B.
4. SCE bill had the correct service address. SCE's consolidated bill identified the service address as 2640 LINCOLN BLVD UNIT 2B and identified Clean Power Alliance (CPA) as the generation supplier. Exhibit 5.
5. The required notice documents omitted Unit #2B. CPA's notice and its mailing vendor's affidavit identify only 2640 Lincoln Blvd, with no Unit #2B. Exhibits 2 and 3. In this multi-unit building, a unitless mailing was not reasonably calculated to reach the Unit 2B customer. Exhibit 4.
6. SCE's own report proves internally inconsistent and facially inaccurate data. In response to Personal Information Request CCPA202605200650, SCE produced a June 8, 2026 report. It lists Home Street Number = 2640, Home Street Name = LINCOLN BLVD, and Home Unit Number = 2640. The value 2640 is the street number, not the unit. The report's separate Service Address table lists the street, city, state, and ZIP but contains no unit field. At the same time, SCE's bill shows UNIT 2B. Exhibits 1A and 1B.
7. The defect is proven; only the downstream path remains in SCE's control. The report itself proves that SCE held address fields that were facially wrong or

internally inconsistent for the same customer and service location. The exact downstream use and transmission of those fields is information within SCE's exclusive possession.

8. SCE-to-CPA transmission is pleaded on information and belief. In or about May 2026, a CPA representative telephoned Complainant in response to a public-records request and stated that CPA used a separate mailing address supplied by SCE and that the SCE-supplied mailing address did not contain Unit #2B. Complainant promptly requested the exact SCE-to-CPA record. That record has not been produced. This allegation is expressly made on information and belief pending production of SCE's transmission records.

9. SCE controls the missing evidence. The exact customer-address payload, field names, timestamps, address-history/audit log, service-start record, call notes or recordings, data-exchange specifications, operating-service-agreement provisions, and SCE/CPA communications are controlled by SCE and/or maintained through SCE's systems. SCE has been asked to preserve and produce them.

10. SCE's duties under Public Utilities Code section 366.2. Subdivision (c)(9) requires electrical corporations to cooperate fully with CCAs, provide appropriate billing and load data, and continue metering, billing, collection, and customer service; the statute expressly authorizes Commission enforcement. Subdivision (c)(16) requires an operating service agreement with performance standards and equitable responsibilities and remedies. Subdivision (c)(19) assigns the electrical corporation the account-transfer function, and subdivision (c)(20) addresses the business and information-system changes and customer communications used to implement CCA service.

11. SCE publicly claims responsibility for account maintenance and address data. SCE's own customer-facing materials state that SCE continues customer care and account maintenance for CCA customers, directs CCA customers to SCE for address changes and account details, and uses the mailing address taken during Start Service for correspondence concerning the customer account. Exhibit 7. These published representations reinforce that the challenged address fields and their correction are SCE functions.

12. Just and reasonable service and practices. Public Utilities Code section 451 requires SCE to furnish and maintain adequate, efficient, just, and reasonable service and to maintain just and reasonable rules and practices affecting

service. Maintaining internally inconsistent unit/address data, furnishing incomplete data for a legally required customer-notice process, and refusing to correct the resulting account harm are not just or reasonable customer-service practices.

13. Notice rights establish causation and injury. Public Utilities Code sections 366.2(c)(13) and (15) preserve opt-out/bundled-service rights and require CCA notices concerning automatic enrollment, service terms, and the opt-out mechanism. Complainant does not allege that SCE independently had CPA's notice duty; Complainant alleges that SCE's inaccurate data caused or materially contributed to the failure of that notice process.

14. Concrete harm. The account was billed CPA generation charges. After the dispute was raised, only a \$91.56 partial correction was issued by moving the affected charges from CPA 100% Green to another CPA product. That did not restore the account to the bundled SCE position that effective notice would have allowed.

15. Amount in dispute. Based on the bill analysis presently available, the remaining correction is estimated at approximately \$502.56 plus interest, subject to the exact bill-level recalculation and tariff data in SCE's possession.

16. Prior rejection does not resolve this complaint. The May 13, 2026 rejection stated that the prior complaint alleged a CPA/vendor notice problem and did not identify a public-utility violation. Exhibit 6. The present complaint identifies and supports a specific SCE act or omission: inaccurate and internally inconsistent SCE-held customer address data and, on information and belief, SCE transmission of a no-unit address to CPA.

17. Requested adjudication. The Commission should accept the complaint, require SCE to answer, permit focused discovery of the SCE address-data records and governing data-exchange obligations, determine whether SCE violated sections 451 and 366.2(c)(9), (16), (19), and (20), and order the account and bill-level relief set out in Attachment B.

ATTACHMENT B - ISSUES, LEGAL BASIS, AND EXACT RELIEF

Proposed category: Adjudicatory. This is an account-specific data and billing-correction dispute, not a challenge to the reasonableness of a generally applicable rate.

Procedure: Regular Formal Complaint. The record/data-transfer issues and requested focused discovery warrant a regular proceeding. Complainant does not request tort, emotional-distress, consequential, or punitive damages.

Material issues:

- Whether SCE maintained facially inaccurate or internally inconsistent address data for the Unit #2B account.
- Whether SCE disclosed or transmitted an address omitting Unit #2B to CPA for enrollment, notice, billing, customer-contact, or mailing purposes.
- Whether SCE violated Public Utilities Code sections 451 and 366.2(c)(9), (16), (19), or (20), applicable SCE tariffs, the SCE/CPA operating service agreement, or governing data-exchange specifications.
- Whether the SCE address-data error caused or materially contributed to the failed CCA notice and resulting account charges.
- What correction, production, bill credit/refund, reparations, interest, and other prospective relief is authorized.

Exact relief requested:

1. Find that SCE maintained inaccurate or internally inconsistent customer-address data for the account and determine whether SCE used, disclosed, or transmitted a no-unit address to CPA.
2. Order SCE to correct every current and historical customer, service, mailing, notification, and CCA data field so that Unit #2B is preserved and is not mis-mapped, truncated, or omitted.
3. Order SCE to produce the exact SCE-to-CPA customer/address record and payload, field names, timestamps, address-history/audit logs, service-start records, call notes/recordings or retention policy, related SCE/CPA communications, the operating service agreement, and governing

data-exchange specifications.

4. Order SCE to preserve all responsive records pending final disposition and judicial review.
5. Order SCE to coordinate with CPA and implement on the consolidated bill a period-by-period correction that places Complainant in the position it would have occupied absent the SCE-caused data error and failed notice.
6. Order the resulting credit/refund, presently estimated at \$502.56 plus interest, subject to exact recalculation. To the extent SCE received or retained an unreasonable amount, order reparations under Public Utilities Code section 734.
7. Order removal of any remaining CCA reentry, billing, or account consequence caused by the data error, and grant other SCE-specific relief the Commission deems just and proper.

Proposed schedule: Answer under the ordinary complaint schedule; prehearing conference approximately 30-40 days after acceptance; focused discovery immediately thereafter; evidentiary hearing approximately 50-70 days after acceptance or as the assigned ALJ directs; final resolution within the adjudicatory statutory period.

EXHIBIT 1A

SCE PERSONAL INFORMATION REPORT - RELEVANT ADDRESS FIELDS

Exact values transcribed from SCE's June 8, 2026 Personal Information Report for request CCPA202605200650. Irrelevant personal data is omitted because formal complaints are public.

Field	SCE report value
Home Street Number	2640
Home Street Name	LINCOLN BLVD
Home Unit Number	2640
Home City / State / ZIP	SANTA MONICA / CA / 90405

The value 2640 in the Home Unit Number field is facially wrong: 2640 is the street number, while the service unit is 2B.

EXHIBIT 1A

SCE PERSONAL INFORMATION REPORT - ADDITIONAL ADDRESS FIELDS

Field	SCE report value / significance
Service Address table	2640 LINCOLN BLVD; SANTA MONICA, CA 90405. No unit field is shown.
Mailing Street Number	16920 - a different address value.
Mailing Street Name	Firmona Ave; Yorktown - multiple address values appear combined.
Mailing Unit Number	8718 - a street number appears mapped as a unit number.

The report and the SCE bill cannot both be a complete, internally consistent representation of the same account. The bill has UNIT 2B; the report assigns the street number 2640 to a unit field and omits a unit from its Service Address table.

EXHIBIT 1B

SOURCE EXCERPTS FROM SCE REPORT (REDACTED TO RELEVANT FIELDS)

A. SCE Home address fields

Non-Standard Home Address	Data Not Found
Home Street Number	2640
Home Street Name	LINCOLN BLVD
Home Unit Number	2640
Home City	SANTA MONICA
Home State	CA
Home Zip Code	90405
Home Zip Code +4	Data Not Found

B. SCE mailing-address fields

Non-Standard Mailing Address	Data Not Found
Mailing Street Number	16920
Mailing Street Name	Firmona Ave;York
Mailing Unit Number	8718
Mailing Address City	Lawndale;Los Ang
Mailing Address State	CA
Mailing Address Zip Code	90260;90045-4135
Mailing Address Zip Code + 4	3213

C. SCE Service Address table

Service Address			
Personal Information	Value	Personal Information	Value
Street Number	2640	Zip Code + 4	Data Not Found
Street Name	LINCOLN BLVD	Service Address	
City	SANTA MONICA	Service County	
State	CA	Installation Address	
Zip Code	90405	Mailing Address ID	

The full password-protected report contains additional confidential personal information and is not publicly attached. Complainant will provide the full report to the assigned ALJ subject to appropriate confidentiality safeguards if requested.

EXHIBIT 2

CPA NOTICE / ADDRESS BLOCK OMITTING UNIT #2B



P.O. Box 811130
Los Angeles, CA 90081

Welcome!

¡Bienvenido!

欢迎!

We are happy to power your home or business through clean, reliable, and competitively-priced renewable energy.

To learn more, change your energy selection, or opt out, visit cleanpoweralliance.org/rateoptions

Para obtener esta información en Español, visite cleanpoweralliance.org/rateoptions

如需更多信息或將您的能源計劃更改為較低的綠色能源計劃選，請訪問 cleanpoweralliance.org/rateoptions

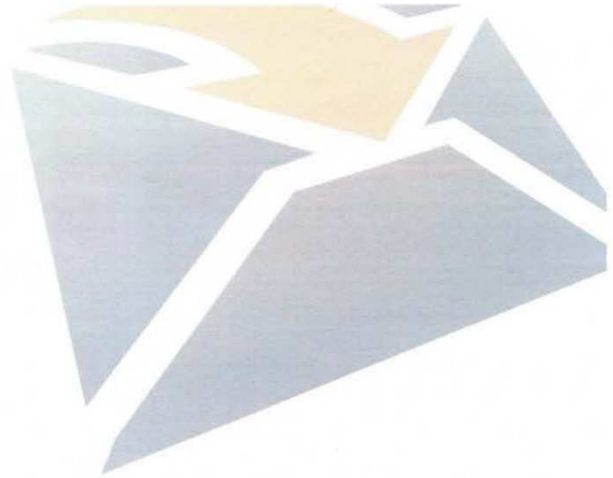
Presorted
Standard U.S.
Postage
PAID
Los Angeles, CA
Permit No 3564



2*3*888*****AUTO**ALL FOR AADC 900
CHARLES CLYDSDALE
OR CURRENT OCCUPANT
2640 LINCOLN BLVD ?
SANTA MONICA, CA 90405-4620

EXHIBIT 3

MAILING-VENDOR AFFIDAVIT OMITTING UNIT #2B



AFFIDAVIT OF MAILING

October 29, 2025

To Whom It May Concern,

I, Stephanie Wallace, declare as follows:

I am the Director of Business Development at Mellady Direct Marketing, located at 29035 The Old Road, Valencia, California 91355. Mellady Direct Marketing is a full-service mail house that prepares, processes, and submits bulk mailings to the United States Postal Service (USPS) on behalf of clients.

On behalf of our client, Clean Power Alliance, Mellady Direct Marketing prepared and mailed Opt-Out Notices to the customer list provided by the client. According to our production and mailing records, the following notices were mailed to the address below:

Recipient:

Charles Clydsdale
2640 Lincoln Blvd
Santa Monica, CA 90405

Mailed on April 17, 2025 – Opt-Out Notice

Mailed on May 21, 2025 – Opt-Out Reminder Notice

The notices were processed using USPS Marketing Mail and entered into the USPS mail stream at the Santa Clarita Business Mail Entry Unit (BMEU) on the respective dates listed above.

Attached are supporting documents including the postage statements, job records, and proof of entry confirming that these mailings were properly submitted to USPS.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 29th day of October, 2025, at Valencia, California.

A handwritten signature in black ink, appearing to read 'Stephanie Wallace', is written over a horizontal line.

Stephanie Wallace
Director of Business Development
Mellady Direct Marketing
661-295-3904 | stephanie@melladydirect.com | melladydirect.com

29035 The Old Road
Valencia, CA 91355
661-298-9190
melladydirect.com
connect@melladydirect.com

EXHIBIT 4

MULTI-UNIT MAILBOX PANEL WITH SEPARATE UNIT 2B BOX



EXHIBIT 5

SCE BILL SHOWING UNIT 2B AND CPA AS GENERATION SUPPLIER

Account and POD identifiers are redacted. The bill shows that the same SCE account had a service address with UNIT 2B and identifies Clean Power Alliance as the generation supplier.

Service ac [REDACTED]
Service address 2640 LINCOLN BLVD UNIT 2B [REDACTED]
SANTA MONICA, CA 90405
Rotating outage Group A007

SUPPLY/GENERATION
CLEAN POWER ALLIANCE
supplies your electricity

EXHIBIT 6

MAY 13, 2026 REJECTION OF PRIOR, DIFFERENT SCE THEORY

The prior rejection treated the dispute as a CPA/vendor notice issue. The present complaint is based on subsequently obtained SCE data proving a specific SCE-held address-data defect.

STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 13, 2026

Charles Clydsdale
Balmoral Realty
8718 Yorktown Ave.
Los Angeles, CA 90045
cc@coho.la

RE: Complaint entitled "Balmoral Realty vs. Southern California Edison Company"

Dear Charles Clydsdale:

The above-entitled complaint, dated April 22, 2026, tendered for filing before the California Public Utilities Commission (Commission), is being rejected for filing because it fails to specify a violation of law or any order or rule of the Commission by a public utility as required pursuant to Rule 4.1(a)(1) of the Commission's Rules of Practice and Procedure.

Your complaint alleges overbilling stemming from improper notice of enrollment with the Clean Power Alliance of Southern California as well as potential opt-out options from that enrollment. The direct mail vendor responsible for the notice is contracted with the Clean Power Alliance of Southern California, which is not a public utility but rather a community choice aggregator. The Commission does not have jurisdiction to adjudicate consumer complaints against community choice aggregators.¹ Any further claims should be raised with the Clean Power Alliance of Southern California.

Sincerely,

/s/ Michael Oliveros

Michael Oliveros
Docket Office Supervisor

cc: Docket Office

¹See Commission Decision 05-12-041 at pp. 19-20.

EXHIBIT 7

SCE'S OWN PUBLISHED ACCOUNT-MAINTENANCE AND ADDRESS RESPONSIBILITIES

SCE Community Choice Aggregation page

SCE directs CCA customers to contact SCE for a change of address or other account details.

Source: SCE official CCA page, sce.com/cca, accessed August 6, 2026.

SCE CCA Help Center

SCE states that it continues customer care and account maintenance for CCA customers.

Source: SCE Help Center, "What is a Community Choice Aggregator?", accessed August 6, 2026.

SCE Start Service mailing-address page

SCE states that the mailing address taken during Start Service is used for correspondence concerning the identified customer account.

Source: SCE Help Center, "Mailing Address - What is this address used for?", accessed August 6, 2026.

These are SCE's own public descriptions of its role. They support the complaint's allegation that address maintenance, customer account details, and CCA account maintenance are SCE functions, even though CPA independently bears its own statutory notice duties.