



FILED

09/30/26

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C2609027

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

Great Harvest Farms, LLC

Complainant,

vs.

Southern California Edison Company (U338E)

Defendant.

Case (C.) _____

Complaint

COMPLAINANT	DEFENDANT (Include Utility "U-Number," if known)
Great Harvest Farms, LLC, a California limited liability company 7519 N. Ingram Ave, Suite 102A Fresno, California 93711 (559) 298-1531 great.harvest@att.net	Southern California Edison Company, a California corporation (U338E) Attn: Anna Valdborg, Director & Managing Attorney 2244 Walnut Grove Avenue Rosemead, CA 91770 T-626-302-6008, E-mail 1: Anna.Valdborg@sce.com, E-mail 2: case.admin@sce.com and E-mail 3: AdviceTariffManager@sce.com

(Internal Use Only)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
COMPLAINT

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

Name of Complainant	Great Harvest Farms,LLC
Address	7519 N. Ingram Avenue, Suite 102A, Fresno, California 93711
Daytime Phone Number	(559) 298-1531
Email Address	great.harvest@att.net

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

☐ Additional complainants listed in attachment

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

Name of Defendant	Southern California Edison Company (U338E), Attn: Anna Valdborg, Director & Managing Attorney
Address	2244 Walnut Grove, Rosemead, California 91770
Daytime Phone Number	(626) 302-6008
Email Address	Anna.Valdborg@sce.com; case.admin@sce.com; AdviceTariffManager@sce.com

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

Name of Defendant	
Address	
Daytime Phone Number	
Email Address	

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 \$ _____

Is your service now disconnected?

☒ YES ☐ NO

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

See attached Exhibit A.

Scoping Memo Information (Rule 4.2[a])

(1) The proposed category for the Complaint is (check one):

- ☒ adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)
☐ ratesetting (check this box if your complaint challenges the reasonableness of rates pursuant to Rule 4.1(b))

(2) Are hearings needed (are there facts in dispute)? ☒ YES ☐ NO

(3) ☒ Regular Complaint ☐ Expedited Complaint (Rule 4.6)

(4) The issues to be considered are

(Example: The utility should refund the overbilled amount of \$78.00):

See attached Exhibit A.

(5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.
Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09): October 30, 2026
Hearing (Example: 7/1/09): December 4, 2026

Explain here if you propose a schedule different from the above guidelines.

There may be some significant pre-hearing discovery to be performed and extensive billing history to be reviewed that may require more time to complete.

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

See attached Exhibit A.

OPTIONAL (OPT OUT OF ELECTRONIC SERVICE): I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by mail (paper only). My/our mailing address(es) is/are:

Dated Fresno California, this 24 day of September, 2026
(City) (date) (month) (year)


Signature of each complainant

(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)

REPRESENTATIVE'S INFORMATION:

Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative: G. Andrew Slater, Esq.

Address: 205 East River Park Circle, Suite 110

Telephone Number: (559) 418-0333

E-mail: aslater@qualcardot.com

Signature: _____

A handwritten signature in blue ink, appearing to be 'G. Slater', is written over the signature line and extends into the E-mail field.

VERIFICATION
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein 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 9/28/26 at Fresno, California
(date) (City)


(Complainant Signature)

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 the matters which are therein 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 9/ /26 at Fresno, California
(date) (City)


Signature of Officer

Leland David Silveira, Jr., Member
Title

NUMBER OF COPIES NEEDED FOR FILING:

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one (1) defendant, then you must submit a total of eight (8) copies.

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

Mail paper copies to:

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

PRIVACY NOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission ("CPUC") intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a **public record** and may be posted on the CPUC's website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available online for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.


Signature

9/ /2026
Date

Leland David Silveira, Jr.
Print your name

EXHIBIT A - FORMAL COMPLAINT

1. Nature of the Complaint

Great Harvest Farms LLC ("Great Harvest") submits this formal complaint concerning Southern California Edison Company's ("SCE") prolonged and improper reliance on estimated usage across nine (9) agricultural service accounts; its failure to reconcile those estimates against available meter and interval data; internally inconsistent rebills, credits, account balances, and collection demands; and its ultimate disconnection of electrical service essential to agricultural irrigation.

Based on the bills, customer-portal information, communications with SCE, and other records presently available, Great Harvest is informed and believes that the problem was not limited to the 2023 flooding period. Rather, SCE used estimated usage on multiple service accounts beginning no later than 2022 and continuing through 2026. A preliminary review of the available records indicates that approximately 82 billing periods, carrying approximately \$206,437.98 in net charges, may remain based on estimates that were not adequately reconciled to identified actual meter readings. These figures are alleged based on the records presently available and remain subject to confirmation through SCE's production and a complete accounting. SCE's portal also appears to identify estimated usage within some periods that SCE's bills characterize as based on an "actual reading."

Great Harvest does not presently contend that every SCE bill was overstated. Great Harvest's contention is that SCE billed, rebilled, collected, and ultimately disconnected service based in substantial part on charges that Great Harvest believes were derived from estimates and were never transparently verified or reconciled, despite Great Harvest's repeated requests for a meter-by-meter accounting and the apparent availability of meter or interval data.

This filing follows Consumer Affairs Branch ("CAB") Informal Complaint File No. 637027. That matter was closed on or about July 15, 2024. Great Harvest timely appealed in writing on July 30, 2024. Great Harvest did not receive a timely, reasoned determination resolving the appeal or the merits of the billing dispute. SCE instead continued its review, billing, collection, and disconnection activity for approximately two (2) additional years before summarily concluding in June of 2026 that all estimated billings had been reconciled against actual usage – a position that cannot be accurate.

2. Scope of Complaint

Great Harvest seeks Commission review of SCE's compliance with its CPUC-approved tariffs and billing obligations; a complete meter-by-meter accounting; correction or cancellation of unsupported estimated charges; appropriate credits or reparations; and restoration and preservation of electric service while the dispute is adjudicated upon payment of current undisputed charges and any deposit properly determined under SCE Tariff Rule 10(C).

Great Harvest further requests production of the complete meter-read history for all nine (9) service accounts, including every register reading, the date of each reading, the read type, the interval data supporting each bill, and a transaction-level reconciliation of every estimate, reversal, rebill, credit, payment, and balance adjustment.

3. Summary of the Billing Issue

Great Harvest is informed and believes that SCE began using estimated usage on the account no later than May 2022, that the practice continued through 2026, and that it affected multiple service accounts. Based on a preliminary review of the records presently available, approximately 82 estimated billing periods appear never to have been reconciled to an identified actual reading, including periods dating back to 2022. Great Harvest is informed and believes that those periods account for approximately \$206,437.98 in net charges, subject to confirmation through SCE's complete records.

The billing records also appear to show approximately 27 instances in which SCE billed estimated usage, credited or reversed the charge, and then reimposed the same or substantially similar estimated usage without identifying the actual reading supporting the final charge. In some instances, the records appear to reflect several iterations of the same estimate. Great Harvest is informed and believes that these transactions did not constitute a reliable true-up and instead obscured whether the resulting balance was supported by actual usage.

The 2023 flooding remains central evidence of why SCE could not reasonably rely on prior-year usage. Historic rainfall, the Cross Creek levee break, flooding of approximately 260 acres, and the availability of flood-release water sharply reduced Great Harvest's need to operate its electric well pumps. Great Harvest reports that it operated only one (1) of the nine (9) pumps from approximately April through July 2023 and used only a few additional pumps on a limited basis from approximately July through October 2023. Estimates derived from 2022, when groundwater pumping was required, were therefore an unreliable proxy for 2023 use.

Great Harvest is informed and believes that SCE's own subsequent readings and billing adjustments show that a number of estimates during and immediately after the flooding period materially exceeded the usage later associated with the affected meters. For example, the presently available records appear to show that SCE estimated 21,012 kWh for meter F-8 for an August-September 2023 period that was later associated with zero actual usage; estimated 18,618 kWh for the same meter for a September-October 2023 period later associated with 296 kWh; and estimated 6,608 kWh for meter 45079 for a September-October 2023 period later associated with 55 kWh. Great Harvest is informed and believes that other estimates were also reduced to zero or near-zero usage. These apparent corrections are consistent with Great Harvest's position that the flooding and reduced pumping made prior-year usage an unreliable basis for estimating 2023 consumption.

To the extent SCE contends that it later "actualized" or trued up the 2023 bills, Great Harvest believes SCE should be required to identify the actual register or interval data used for each meter and billing period and reconcile that data with the prior estimates, subsequent credits and rebills, and Great Harvest's operational evidence. Merely labeling a bill as "actual" does not resolve the issue because the customer portal appears to show estimated usage within some periods labeled as based on an actual reading.

Great Harvest recognizes that a complete accounting may identify adjustments in both directions. Great Harvest seeks an accurate reconciliation, not a one-sided calculation. The records presently available appear to show both overstatements and understatements in particular periods,

further demonstrating that the disputed balance should not have been treated as established without a complete meter-by-meter reconciliation.

In August and September 2026, SCE continued collection and disconnection activity while communicating materially inconsistent account balances, cure amounts, and deadlines. SCE disconnected most of the nine (9) meters on or about September 2, 2026, and all meters appear to have been disconnected by approximately September 11, 2026.

4. Factual Chronology

Great Harvest has been an SCE agricultural customer in Kings County since approximately 2014. Account No. 700508228918 includes nine (9) service accounts and nine (9) meters serving wells used for irrigation and related farming operations in Hanford and Armona, California.

Beginning no later than May 2022, SCE appears to have issued estimated bills on multiple service accounts. Great Harvest is informed and believes that many of those estimates were not promptly or adequately reconciled against identified actual readings, including an estimated period for meter F-8 dating to June-July 2022.

During 2023, Kings County experienced historic rainfall and flooding. The Cross Creek levee broke, approximately 260 acres of Great Harvest's land remained underwater for much of the growing season, and flood-release water was available for irrigation. Great Harvest's need to operate its electric well pumps was sharply reduced.

In or about August 2023, SCE issued a bill exceeding 200 pages and demanding approximately \$170,000 in charges reaching back approximately twelve (12) months. SCE personnel advised Great Harvest that much of the usage was estimated from prior-year consumption. That methodology was particularly unreliable for the 2023 flood period because pumping conditions were materially different from 2022.

Great Harvest opened a rebilling request in August 2023. Its contemporaneous call log records that, on September 27, 2023, SCE stated the request was still in progress and could take nine (9) months before escalation. On October 31, 2023, SCE extended the account while the ticket remained unfinished. SCE nevertheless issued disconnection notices in December 2023 and January 2024 while Great Harvest was current on SCE payments and the billing dispute remained open.

On January 11, 2024, an SCE representative reported that the August 2023 rebilling ticket had been assigned but had "never got worked on." Another SCE representative stated that technicians would need to go to the meters and download correct usage back to 2022. On April 26, 2024, an SCE field technician reported that the meters were rendering data but were not communicating. The field technician then installed signal boosters rather than replacing the meters, and confirmed that historic read files could be retrieved.

Those statements appear to conflict with other SCE statements on March 20 and May 16, 2024 that historic actual usage could not be retrieved and that smart meters no longer had meter readings. Great Harvest has been able to access interval information through SCE's customer portal and is

informed and believes that additional historical meter data exists. SCE should be required to explain the differing representations and produce the underlying records.

On March 21, 2024, Great Harvest opened nine (9) separate billing-inquiry tickets, one for each meter. SCE responded on May 16, 2024. SCE reimbursed \$13,630.48 on ticket 283144 for meter F-3, establishing that at least some estimates were erroneous and required adjustment. SCE declined adjustment on other meters, gave no substantive answer on two tickets, and stated that meter F-8 was being rebilled without providing a completed rebill.

SCE denied ticket 283146 for meter F-7 on the stated ground that the September-October 2023 estimates were in line with or lower than prior data. Based on subsequently available information, Great Harvest is informed and believes that the usage associated with those periods was materially lower than SCE's estimates and that the stated basis for denying the ticket was therefore unreliable.

SCE also stated on May 16, 2024 that there were no estimates on meters 33635 and 45079. The billing and portal records presently available appear inconsistent with those statements and appear to reflect additional estimated usage associated with those meters.

On June 7, 2024, Great Harvest captured screenshots from SCE's "View Usage" portal for four meters for the April 9-May 7, 2024 period. The portal figures appear to correspond to the applicable bills. Certain periods described on the bills as based on an "actual reading" nevertheless appear to contain usage flagged by SCE's portal as "Estimated Data." Great Harvest is therefore informed and believes that estimated usage may also be embedded within billing periods not expressly classified as estimated.

On June 7, 2024, Great Harvest filed CAB Informal Complaint File No. 637027. Great Harvest submitted flooding photographs and videos, water-use records, portal screenshots, and rainfall information by July 10, 2024. The CAB matter was closed on or about July 15, 2024 based on an asserted failure to provide documentation. Great Harvest appealed on July 30, 2024 and resubmitted the materials, with additional documents, to SCE on or about August 2, 2024. SCE representative Yvette Sarmiento acknowledged that SCE's Billing Department was reviewing the submission.

SCE did not promptly resolve the dispute. When Great Harvest challenged an October 9, 2024 disconnection notice, Ms. Sarmiento extended the account because the Billing Department was still reviewing the nine (9) meters, usage, and estimates. When Great Harvest challenged a March 12, 2025 disconnection notice, an SCE Credit Department representative stated that a formal dispute would be noted and would prevent the pending disconnection.

Great Harvest is informed and believes that estimated billing continued through 2026 and that approximately 82 periods, carrying approximately \$206,437.98 in net charges, remained unreconciled when service was disconnected. The records appear to reflect approximately 27 instances in which estimated usage was credited or reversed and then reimposed without an identified actual reading. SCE also appears to have issued estimated-usage charges associated with a meter that had been stolen, reported to the county sheriff, and not replaced.

The records presently available also appear to show periods in which SCE's billed usage was lower than the usage reflected by meter or interval information. Great Harvest requests an explanation and complete reconciliation of those discrepancies as well. The existence of possible discrepancies in both directions reinforces Great Harvest's position that neither billing labels nor selected estimates can substitute for a complete meter-level accounting.

On June 30, 2026, after approximately two (2) years of review, Ms. Sarmiento stated that SCE had determined that charges for February-October 2023 were based on actual metered consumption. SCE did not provide the underlying register readings, interval data, calculation, or meter-by-meter reconciliation supporting that conclusion. The assertion also failed to address SCE's prior admissions of estimated billing, its later corrections to zero or near-zero usage, or its portal's identification of estimated data within periods labeled actual.

On July 20, 2026, SCE stated that the Consumer Affairs investigation had concluded and asserted a balance of \$524,279.48. Great Harvest continued to pay amounts periodically demanded to avoid disconnection, without admitting the disputed balance and without waiving its claims.

During an eight-day period in late August 2026, SCE representative Valerie Strevell left two (2) voice messages and sent three (3) emails concerning the disputed balance and threatened disconnection. An August 17 email identified a past-due balance of \$524,279.48 and \$26,194.59 in current charges due September 2. An August 25 email repeated those figures and acknowledged Great Harvest's July 20 payment of \$24,176.57.

SCE's formal notices stated different figures. An August 14, 2026 disconnection notice identified previous charges of \$500,102.91 and demanded \$24,176.57 by August 31, even though Great Harvest had already paid that exact amount on July 20. An August 13 billing statement asserted a total amount due of \$550,474.07, consisting of \$524,279.48 past due plus \$26,194.59 in new charges. An August 18 disconnection notice instead stated that \$500,102.91 was due.

Great Harvest sought clarification on August 26, 2026. SCE did not reconcile the contradictory balances, cure amounts, or deadlines and declined to extend the threatened disconnection date. Great Harvest paid an additional \$26,194.59 before August 31 solely to protect its crops and preserve service, without admitting the validity of the disputed historical balance.

SCE nevertheless disconnected most of the nine (9) meters on or about September 2, 2026, and all of the meters appear to have been disconnected by approximately September 11, 2026. Great Harvest is informed and believes that SCE continued to assert a balance exceeding \$500,000 at or near the time of disconnection. Continuous electrical service is indispensable to Great Harvest's irrigation wells, and continued disconnection threatens crops, trees, and the viability of ongoing farming operations.

5. Billing Records and Need for an Accounting

Based on the bills, portal information, ticket history, call records, and other documents presently available, Great Harvest is informed and believes that SCE's estimated billing was not limited to an isolated period and that a substantial portion of the disputed balance has not been supported by a transparent meter-by-meter reconciliation. Great Harvest's preliminary review

indicates approximately 82 potentially unreconciled estimated periods totaling approximately \$206,437.98 in net charges, subject to confirmation through SCE's complete records.

The available records appear to show that some estimates were materially inaccurate and were later reduced, including during and immediately after the 2023 flooding period. By way of example, certain available records appear to reflect estimates of 21,012 kWh later associated with zero actual usage, 18,618 kWh later associated with 296 kWh, and 6,608 kWh later associated with 55 kWh. Other records appear to show periods in which billed usage may have been lower than usage reflected by available meter information. Great Harvest does not presently claim that every discrepancy favors Great Harvest. Rather, Great Harvest alleges that the account could not reliably be treated as settled, liquidated, or subject to disconnection without a complete accounting.

Great Harvest does not presently possess all of the meter-read, interval, billing-transaction, and adjustment records necessary to determine the correct amount for every disputed period. Great Harvest is informed and believes that SCE possesses additional responsive records and should be required to identify the basis for each estimated or corrected charge and to reconcile all estimates, reversals, rebills, credits, payments, and adjustments.

Great Harvest's pump-run records and evidence concerning the flooding corroborate the timing and reduced extent of irrigation activity but are not offered as a complete substitute for meter data. Great Harvest therefore requests that the Commission require SCE to produce and use the best available actual meter and interval data in completing the accounting.

6. Request for Relief Under SCE Tariff Rule 10

Great Harvest disputes SCE's asserted historical balance, which exceeds \$500,000, and requests relief under SCE Tariff Rule 10(C). Great Harvest is unable to deposit the full disputed amount. Great Harvest therefore requests that CAB determine and permit a reduced deposit based on the average billings for the 90-day period contemplated by Rule 10(C), excluding the disputed historical balance, rather than requiring deposit of the entire amount claimed by SCE.

Because service has already been disconnected, Great Harvest requests immediate restoration upon payment of current undisputed charges and the reduced deposit determined under Rule 10(C), or on such other interim terms as the Commission determines appropriate. SCE should not condition restoration on payment or acknowledgment of the disputed historical balance. Any reconnection charge should be waived because SCE disconnected service while the billing dispute, appeal, and request for administrative relief remained unresolved.

Great Harvest further requests that service remain connected during this proceeding so long as it timely pays current undisputed charges and complies with the deposit determination. The nine (9) meters serve agricultural irrigation wells, and continued disconnection threatens immediate and irreparable loss of crops and trees.

7. Requested Commission Action

Great Harvest requests that the Commission:

- a. Investigate SCE's use of estimates, rebills, credits, collection activity, and disconnection of Great Harvest's nine (9) service accounts from 2022 through 2026;
- b. Require SCE to produce the complete meter-read history for all nine (9) service accounts, including every register reading with its date and read type, all available interval data, and the records supporting each period identified as actual, estimated, customer-read, corrected, or catch-up;
- c. Require a transaction-level accounting that reconciles each estimate, reversal, rebill, credit, payment, adjustment, and balance, including instances in which estimated usage appears to have been credited and later recharged;
- d. Require SCE to true up all disputed estimated periods, including the approximately 82 periods presently identified by Great Harvest and any estimated usage embedded within periods labeled actual, against the best available actual meter or interval data; where SCE cannot produce reliable actual data, cancel unsupported estimated usage charges or determine a fair adjustment under the applicable tariffs;
- e. Determine and award all credits, refunds, and reparations within the Commission's authority, subject to supplementation as further records are produced and the accounting is completed;
- f. Require SCE to identify and reconcile periods in which the billed usage appears not to agree with available meter or interval information, whether the discrepancy favors Great Harvest or SCE;
- g. Require SCE to explain the basis for denying ticket 283146, its statements that meters 33635 and 45079 carried no estimates, and its differing statements about whether historic meter data could be retrieved;
- h. Determine a reduced deposit under Rule 10(C), direct immediate restoration of service, and preserve service during this proceeding upon Great Harvest's compliance with the Commission's interim payment and deposit requirements;
- i. Suspend collection activity on the disputed historical balance while this proceeding is pending and prohibit any requirement that Great Harvest acknowledge the disputed balance as a condition of restoration or continued service; and
- j. Grant such other relief as the Commission deems just and authorized.

8. Supporting Records

Great Harvest possesses records supporting its allegations, including SCE bills, customer-portal and interval information, pump operating records, portal screenshots, ticket and call histories, flooding photographs and videos, water-use records, and rainfall information. Great Harvest will produce or submit supporting records as appropriate during this proceeding.

Great Harvest reserves the right to supplement this complaint and the requested relief as SCE produces the complete meter, interval, billing, credit, payment, collection, and disconnection records needed to finish the reconciliation. Great Harvest also reserves any potential civil claims for damages arising from the conduct alleged herein.

9. Point of Contact and Certification

Great Harvest's designated representative is Leland David Silveira, Jr., great.harvest@att.net, 7519 N. Ingram Ave., Suite 102A, Fresno, California 93711.

Great Harvest certifies that the factual statements in this complaint are true and correct to the best of its knowledge based on its records and the SCE records presently available, subject to supplementation after SCE produces the complete meter-level and transaction-level data requested above.