BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Delia Lovell, Complainant, vs. Southern California Edison Company (U 338-E), Defendant.	Case 26-07-006 (Filed July 1, 2026)

COMPLAINANT DELIA LOVELL'S MOTION TO COMPEL PRODUCTION OF METER READS, BILLS, AND ACCOUNT RECORDS SUBSTANTIATING THE BALANCE DEMANDED; [PROPOSED] RULING

I. INTRODUCTION

Pursuant to Rules 10.1, 11.1, and 11.3 of the Commission's Rules of Practice and Procedure, Complainant Delia Lovell moves for an order compelling Southern California Edison Company (SCE) to produce two categories of records: (1) the meter reads, charges, and bills for every billing period that makes up any part of the balance SCE demands on Account Nos. 700619044849 and 700981814038, from the first such charge to the last; and (2) for every account SCE has associated with Delia Lovell or with service at 325 Emerald Drive, Lake Arrowhead, the account and customer-of-record information, the complete billing history, and the ownership records, including the records of who requested each account and authorized each transfer of a balance between accounts.

SCE's October 21, 2026 bill demands $14,716.49. That balance includes a $12,649.17 "Miscellaneous Transfer" from a closed account and charges originating before December 21, 2022, the earliest date of any bill SCE has produced. SCE objected to every data request and has not supplemented its production since agreeing to do so at the October 30, 2026 meet and confer. A balance that cannot be traced to reads and bills should not be collected and should be either substantiated or removed.

II. BACKGROUND

A. The Balance in Dispute

SCE's earliest bill in Complainant's possession, dated December 20, 2023, opens with a previous balance of $4,785.11. SCE closed Account No. 700619044849 on May 29, 2025 at $12,649.17, opened Account No. 700981814038 at a zero balance, which Complainant did not request, and on September 22, 2025 added the full $12,649.17 to the new account as a "Miscellaneous Transfer." SCE disconnected service on February 4, 2026 and restored it days later. SCE's own bills record estimated reads every other month from June 2022 through August 2024, bills withheld and then issued in bulk, rate corrections in January 2023 and September 2024, and late payment charges on a CARE-eligible account.

SCE's records show three account numbers for the same residence:

Account No.	What the record shows
2-30-248-6675	Complainant's original account number. Complainant reported to SCE on April 1, 2023 that it had been changed without Complainant's authorization.
700619044849	The account on SCE's bills from 2022 to 2025, mailed to the Beverly Hills business address. SCE closed it on May 29, 2025 at $12,649.17, marked "AMP ACCOUNT."
700981814038	Opened May 28, 2025 at a zero balance; Complainant did not request it. SCE transferred the $12,649.17 into it on September 22, 2025, and it now carries the $14,716.49 balance.

B. Discovery

Complainant served a First Set of 24 Data Requests on August 17, 2026, including requests for seven years of bills (DR 1-01) and itemized billing history (DR 1-05). On August 24, 2026, SCE objected to all 24 requests, produced no documents for seven of them, attached bills only from December 21, 2022 forward, and in response to DR 1-01 re-served Complainant's own appeal rather than SCE's bills. SCE moved to dismiss on August 27, 2026; that motion is pending.

C. Complainant's Repeated Notice to SCE and the Commission

Complainant has disputed SCE's billing since 2023. On April 1, 2023, Complainant wrote to SCE that the original account number, 2-30-248-6675, had been changed without authorization, that Complainant was locked out and could not pay, that the bill was drastically overstated, and that Complainant is disabled and cannot be without electricity. Complainant then pursued Informal Complaint No. 594987 (May to September 2023), in which Commission records show SCE's agents stating that the reads could not be right; Informal Complaint No. 619965 (January to March 2024), closed without records after Complainant was told a subpoena was required; and CAB Complaint No. 716635 (SCE Investigation No. 398314), which was open when SCE disconnected service on February 4, 2026 and was closed on March 10, 2026.

D. Meet and Confer

Complainant sent a meet-and-confer letter on August 28, 2026, and the parties met and conferred on October 30, 2026, as required by Rule 11.3(a). SCE stated that the bills had been provided before and are on its portal; Complainant explained that the portal begins with an already accumulated balance and contains no records of how it accrued. SCE agreed to provide the bills available to it and to confirm that its portal is up to date. SCE stated that a list of all accounts associated with Complainant is out of scope. No supplemental production has been received. (Declaration of Delia Lovell, attached.)

III. RECORDS COMPLAINANT ASKS THE COMMISSION TO COMPEL

To reduce the burden on SCE, Complainant has narrowed the records sought to the two categories essential to Issue 1 of the Scoping Memo. The data requests and SCE's responses are attached as Attachments A and B.

1. **Meter reads, charges, and bills behind every dollar demanded.** For every billing period whose charges make up any part of the $14,716.49 balance, on either account, from the first such charge to the last bill: (a) the beginning and ending meter reads, read dates, and whether each read was actual or estimated; (b) the amount charged and the rate applied; and (c) the bill as issued. This includes every period before December 21, 2022 that contributed to the $4,785.11 balance shown in December 2023 and to the $12,649.17 transferred in September 2025.

2. **Every account, its complete billing history, and its ownership records.** For every account SCE has associated with the name Delia Lovell or with service at 325 Emerald

Drive, Lake Arrowhead, from the opening of service to the present, including original Account No. 2-30-248-6675 and Account Nos. 700619044849 and 700981814038, SCE shall produce: (a) the account number, the name and customer of record, the service address, and every billing or mailing address used, including the basis for addressing the residential account to 468 N Camden Drive, Beverly Hills; (b) the complete billing history of each account from its opening, including every bill, payment, adjustment, transfer, and closing balance; and (c) the ownership and account records for each account, including the application or request that opened it, the identity of the person who requested or authorized each opening, closing, or change of account, and every authorization, calculation, and internal record for each transfer of a balance between accounts, including the $12,649.17 transfer of September 22, 2025 and the minus $439.44 transfer of November 2025.

IV. ARGUMENT

A. The Scoping Memo Requires a Bill-by-Bill Determination

The Assigned Commissioner's Scoping Memo and Ruling of October 21, 2026 places bill accuracy at issue and calls for identification of each monthly bill containing an error and the amount of the error (Issue 1). That determination cannot be made without the meter read and bill for each billing period that makes up the balance. The records sought are relevant under Rule 10.1 and necessary for the Commission to decide the issue it has scoped.

B. The Production Does Not Substantiate the Balance

1. **No origin.** No bill before December 21, 2022 has been produced. Complainant paid the full $97.62 then due on December 10, 2022; SCE's next two bills demanded $1,202.95 and $2,335.06, and the balance reached $4,785.11 by December 2023.

2. **Bills withheld, then issued in bulk.** SCE's own online history shows no bill between June 6, 2022 and January 3, 2023, when SCE rebilled every period from May 23 through December 20, 2022, and none between January 25 and May 8, 2023, when SCE billed three periods at once with a disconnection notice.

3. **Implausible reported usage.** SCE's own bills report about 2 kWh per day for February through May 2022, about one-twentieth of the usage SCE reported for the same months in 2023 and 2024, for a home Complainant occupied full time. Only the underlying reads can show what was measured and what was estimated.

4. **Repeated estimates and catch-up billing.** SCE estimated the read on meter 308Z-298216 every other month from June 2022 through August 2024. After estimating December 2022 at 420 kWh, SCE billed 4,079 kWh in January 2023, including 2,392 kWh at its highest-priced High Usage Charge tier.

5. **An unexplained transfer.** SCE has produced no document authorizing or calculating the $12,649.17 transfer or the minus $439.44 transfer of November 2025.

SCE has corrected its own billing on this account, applying the CARE rate retroactively in January 2023 and again in September 2024, and reversing late charges in November 2025. Complainant recognizes those corrections. They also confirm that the account's history contains acknowledged errors, and that only the source records can show whether every remaining charge is accurate.

C. SCE Bears the Burden of Substantiating Its Charges

Public Utilities Code section 451 requires that all charges demanded be just and reasonable, and section 532 bars a utility from collecting compensation other than its filed tariff rates. SCE Tariff Rule 17 defines billing error and limits adjustments for undercharges or overcharges to three years. General Order 28 requires a utility to preserve the records supporting its accounts. Each presumes that SCE can produce the reads and bills behind the amounts it collects.

D. Account and Ownership Records Are Within Scope

SCE stated at the meet and confer that account records are out of scope. They are squarely within scope. SCE admits that it transferred a $12,649.17 balance from Account No. 700619044849 into Account No. 700981814038, a second account that Complainant did not request, and it now seeks to collect that balance in this proceeding. SCE also changed the original account number, 2-30-248-6675, without Complainant's authorization, and addressed the residential account to a business address. Whether Complainant owes the transferred balance depends on who owns each account, who requested and authorized each opening, closing, and change, and how each balance was calculated and moved. The complete billing history and ownership records of every account associated with Complainant or the service address are the only records that can answer those questions.

V. RELIEF REQUESTED

Complainant respectfully requests a ruling that:

1. **Production.** The motion be decided at the November 6, 2026 status conference, and SCE produce the records described in Section III, in native electronic format where available, by a date the Administrative Law Judge sets.

2. **Record held open.** If the records cannot be produced before the November 10, 2026 evidentiary hearing, the record on Issue 1 remain open, or Issue 1 be deferred, until SCE produces them.

3. **Certification.** If SCE contends any responsive record no longer exists, SCE identify it, state when and how it ceased to exist, and identify any Commission authority for its destruction under General Order 28.

4. **Interim protection.** Pending a decision on the complaint, SCE not disconnect service, pursue collection of the disputed balance, or report it to any consumer reporting agency.

5. **Effect of nonproduction.** SCE may not rely on any charge it does not trace to a meter read and a bill in its production to support the balance demanded.

6. **Shortened response time.** Given the November 10, 2026 hearing, the time for SCE to respond to this motion under Rule 11.1 be shortened as the Administrative Law Judge deems appropriate.

This motion seeks production only. Complainant's claims for financial relief remain before the Commission on the merits: removal of every charge SCE cannot trace to a meter read and a bill at the correct rate, reparations under Public Utilities Code sections 734 and 736, and penalties under sections 2107 and 2108. SCE's billing and the February 4, 2026 disconnection have caused Complainant emotional distress, pain and suffering, physical harm, loss of use of the home, loss of security and safety in the home, and sustained stress, and Complainant reserves all claims for those damages under section 2106.

VI. CONCLUSION

Complainant has engaged in good faith throughout discovery and has delivered the payment history SCE requested. Complainant asks only that SCE show the meter reads and bills behind the balance it demands. The motion should be granted.

Dated: November 2, 2026

Respectfully submitted,



/s/ Delia Lovell

Delia Lovell (Preferred Name: Wolf)
Complainant, In Pro Per
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DECLARATION OF DELIA LOVELL IN SUPPORT OF MOTION TO COMPEL
(Rule 11.3(a))

I, Delia Lovell, declare:

1. I am the Complainant in this proceeding and the customer of record for SCE Account Nos. 700619044849 and 700981814038, serving 325 Emerald Drive, Lake Arrowhead, which I occupied full time in 2022. I have personal knowledge of the facts stated here.

2. On April 1, 2023, I wrote to SCE that my original account number, 2-30-248-6675, had been changed without my authorization, that I was locked out and could not pay, that my bill was drastically overstated, and that I am disabled and cannot be without electricity.

3. I disputed SCE's billing through CPUC Informal Complaint Nos. 594987 (2023) and 619965 (2024) and CAB Complaint No. 716635, which CAB closed on March 10, 2026. SCE disconnected my service on February 4, 2026 and restored it days later.

4. On August 17, 2026, I served my First Set of Data Requests on SCE. SCE served objections and limited documents on August 24, 2026.

5. On August 28, 2026, I sent SCE a meet-and-confer letter. On October 30, 2026, I met and conferred with SCE counsel Angela Whatley and Pauline Nguyen in a good-faith effort to resolve this dispute. SCE agreed to provide the bills available to it and to confirm that its portal is up to date, and stated that a list of all accounts associated with me is out of scope. I agreed to provide my payment history, which I delivered on November 1, 2026. As of this declaration, SCE has made no supplemental production.

6. Attached as Attachment A is a true copy of my First Set of Data Requests, and as Attachment B a true copy of SCE's August 24, 2026 responses.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on November 2, 2026, at Lake Arrowhead, California.



/s/ Delia Lovell
Delia Lovell

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Delia Lovell, Complainant, vs. Southern California Edison Company (U 338-E), Defendant.	Case 26-07-006 (Filed July 1, 2026)

[PROPOSED] ADMINISTRATIVE LAW JUDGE'S RULING GRANTING COMPLAINANT'S MOTION TO COMPEL

Complainant Delia Lovell's Motion to Compel Production of Meter Reads, Bills, and Account Records, filed November 2, 2026, is granted. IT IS RULED that:

1. Southern California Edison Company (SCE) shall produce, in native electronic format where available, no later than _____, 2026: (a) for every billing period whose charges make up any part of the balance demanded on Account Nos. 700619044849 and 700981814038, the beginning and ending meter reads, read dates, whether each read was actual or estimated, the amount charged and rate applied, and the bill as issued; and (b) for every account SCE has associated with Delia Lovell or with service at 325 Emerald Drive, Lake Arrowhead, including Account Nos. 2-30-248-6675, 700619044849, and 700981814038: the account number, name and customer of record, service address, and every billing or mailing address used; the complete billing history from the opening of the account; and the ownership and account records, including the request that opened each account, the identity of the person who requested or authorized each opening, closing, or change, and every authorization, calculation, and internal record for each transfer of a balance between accounts.

2. If SCE contends any responsive record no longer exists, it shall identify the record, state when and how it ceased to exist, and identify any Commission authority for its destruction.

3. Pending a decision on the complaint, SCE shall not disconnect service, pursue collection of the disputed balance, or report it to any consumer reporting agency.

4. SCE may not rely on any charge it does not trace to a meter read and a bill in its production to support the balance demanded.

5. If production is not complete before the evidentiary hearing, the record on Issue 1 shall remain open until it is complete.

Dated _____, 2026, at San Francisco, California.

_____
Camille Watts-Zagha
Administrative Law Judge