

Application No.: A.23-05-010
Exhibit No.: SCE-08
Witnesses: R. Lisbin



(U 338-E)

2025 General Rate Case

Compliance Requirements

Before the

Public Utilities Commission of the State of California

Rosemead, California
May 12, 2023

SCE-08: Compliance Requirements

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1 I.

2 **SUMMARY**

3 The purpose of this Exhibit is to demonstrate that Southern California Edison Company (SCE or
4 Company) has submitted all required studies and information that impact this General Rate Case (GRC).

5 We identified compliance action items by reviewing the Ordering Paragraphs, Conclusions of
6 Law, Findings of Fact, and discussions contained in Commission decisions, resolutions, and
7 Administrative Law Judge (ALJ) Rulings and Commission directives pertaining to the previous SCE
8 GRCs. In addition, we reviewed Commission directives pertaining to other SCE proceedings and other
9 electric utility or generic proceedings since SCE's last GRC.

10 Of all the potential SCE compliance action items identified, only those that impact this GRC are
11 addressed in this Exhibit. One-time compliance items that were completed in the 2021 GRC and
12 previous GRC proceedings are not included in this 2025 GRC Compliance Exhibit.

13 The attached list identifies the compliance action items ordered by the proceeding in which the
14 compliance item arose. For each compliance action item, we provided the following information:

15 • The CPUC Decision, Public Utilities (PU) Code, Resolution, Advice Letter which resulted in
16 the compliance action item, all generally referred to as Source Citation. For example, "D.21-08-036
17 Commission's 2021 GRC Decision" refers to SCE's Test Year 2021 GRC Decision.

18 • Action Required. This usually consists of a verbatim quote of the applicable language from
19 the Source Citation. In general, if the Source Citation includes an Ordering Paragraph, the "Action
20 Required" will only quote such Ordering Paragraph. In some instances, other Source Citation language
21 will be quoted if we believe it is helpful in clarifying the Action Required.

22 • Source Citation Reference. This indicates where in the Commission's Source Citation
23 identified compliance action may be found. The Source Citation Reference may refer to any
24 combination of Ordering Paragraph, Conclusion of Law, Finding of Fact, or discussion pages.

25 • Compliance Action/Status. A summary is provided regarding the status of any compliance
26 action items and/or a reference (to SCE's Exhibits or Workpapers in this proceeding) pointing to where a
27 particular item is addressed.

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II.

SUMMARY OF COMPLIANCE ACTION ITEMS

The following Table II-1 summarizes all compliance action items that impact this 2025 General Rate Case (GRC).

***Table II-1
Southern California Edison Company
2025 General Rate Case (GRC)
Reporting and Compliance Items***

| Item No. | Action Required | Source Citation Reference | Compliance Action/Status |
|--|---|-----------------------------------|--------------------------|
| PU Code Section 769(d) Instituted by Assembly Bill 327, Section 8 – Distribution Resources Plan | | | |
| 1 | Any electrical corporation spending on distribution infrastructure necessary to accomplish the distribution resources plan shall be proposed and considered as part of the next general rate case for the corporation. | PU Code Section 769(d) | SCE-02, Vol. 6, Part 1 |
| PU Code Section 740.4 Authorization for public utilities to engage in programs to encourage economic development activities | | | |
| 2 | It is the intent of the Legislature that the Public Utilities Commission, in implementing this chapter, shall allow rate recovery of expenses and rate discounts supporting economic development programs within the geographic area served by any public utility to the extent the utility incurring or proposing to incur those expenses and rate discounts demonstrates that the ratepayers of the public utility will derive a benefit from those programs. | PU Code 740.4 | SCE-03, Vol. 2 |
| PU Code 8386.4 Wildfire Mitigation | | | |
| 3 | The chief executive officer of an electrical corporation shall certify in each general rate case application that the electrical corporation has not received authorization from the commission to recover the costs in a previous proceeding, including wildfire cost recovery applications. | PU Code 8386.4, Subsection (b)(3) | GRC Application |
| D.22-10-004 Decision approving Southern California Edison Company’s 2020 Energy Resource Recovery Account Entries and Related Matters | | | |
| 4 | SCE will fully align its authorized uncollectibles methodology with San Diego Gas & Electric Company’s and Pacific Gas and Electric Company’s methodologies in SCE’s next general rate case by adjusting its uncollectibles factor calculation methodology to update annually and by revising its authorized uncollectibles to incorporate billed revenues rather than historical write-offs. | Ordering Paragraph 6 | SCE-03, Vol. 1 |
| D.22-10-002 Decision Addressing Phase 1, Tracks 3 and 4 Issues | | | |
| 5 | Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas) and San Diego Gas & Electric company (SDG&E) shall implement the requirements for Risk Spending Accountability Reports (RSAR), Risk Assessment and Mitigation Phase (RAMP) filings, and GRC applications contained in Appendix A to this decision, effective immediately with the exception of requirement 25 in Appendix A, which PG&E, SCE, SoCalGas, and SDG&E shall each implement in its first annual RSAR due following approval of its next GRC application approved subsequent to adoption of this decision, as outlined in this decision. The RSAR, RAMP, and GRC requirements contained in Appendix A add to and do not replace those adopted in Decision (D).14-12-025, D.16-08-018, | Ordering Paragraph 1 | SCE-01, Vol. 2 |

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| | <p>D.18-12-014, D.19-04-020 and D.20-01-002, which are retained unmodified, with the exception of the annual RSAR schedule, modified in requirements 1 and 2 in Appendix A.</p> <p>Appendix A - Additional RSAR, RAMP and GRC Requirements, as Adopted. The following compliance requirements are GRC specific Requirements:</p> <ul style="list-style-type: none"> • Where feasible, the IOUs should standardize chapters and headings in the RSARs, RAMPs and GRCs. Where RAMP risks pertain to only one GRC program, the IOU should endeavor, where feasible, to ensure that the two filings use the same program name(s). • The IOUs shall explicitly map costs and comments between the RAMP and GRC filings. The cost mapping must identify expenses as either capital or operating expenses. • The IOUs shall identify capital expenditures and operating costs stemming from an approved WMP as such in the GRC or other applications for cost recovery. Each WMP mitigation shall be mapped to at least one GRC cost category, or to a cost category in a separate WMP cost recovery application if applicable and tracked in the RSAR. • The IOU's GRC Application shall contain GRC Workpapers with chapter or risk information, RAMP mitigation cost estimates, proposed GRC cost estimates and the difference from RAMP estimates. • Each IOU shall include its imputation methodology in its GRC testimony when the utility files its GRC application, with any updates to that methodology filed as supplemental testimony. • IOUs shall file a summary of RAMP SPD and party comments in the docket of the RAMP proceeding as well as in the docket of the relevant GRC proceeding. The comment summary would be subject to informal discussions between parties. • IOUs shall address all RAMP comments and explain how any recommendations found in the RAMP comments were or were not adopted and why in their GRC testimony when they ask for GRC cost recovery. | | |
| D.22-06-032 - Decision Addressing Southern California Edison Company's Track 3 Request for Recovery of Wildfire Mitigation Memorandum and Balancing Account Balances | | | |
| 6 | <p>In testimony, SCE indicated it is working with the fuse supplier to evaluate potential impacts related to the manufacturing changes and it is possible SCE may receive some financial recovery from the fusing manufacturer. In the event SCE receives recovery from the manufacturer or supplier for the defective fuses, SCE shall in its next GRC provide an accounting of the amounts of the recovery, as well as the number of costs of the defective units. To the extent ratepayers have funded some of these</p> | pp. 32-33 | SCE-04, Vol. 05, Part 2 |

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| | fuses, ratepayers should be credited their fair share of any recovery from the manufacturer or supplier. | | |
| D.21-11-009 Decision Addressing Phase 1, Track 1 and 2 Issues | | | |
| 7 | <p>Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and San Diego Gas & Electric Company (SDG&E) (collectively investor-owned utilities or IOUs) shall implement the following in their Risk-Based Decision-Making Framework (RDF) and Risk Assessment Mitigation Phase (RAMP) filings:</p> <ul style="list-style-type: none"> a. Each investor-owned utility (IOU), and the IOUs as a group, shall consistently and uniformly define and treat all forms of mitigations including control measures and all subcategories of control measures, including in related proceedings; b. Each IOU shall evaluate all mitigations for efficacy and efficiency, whether the mitigation is “in process” or newly proposed; c. Each IOU shall calculate Risk Spend Efficiencies (RSEs) for all mitigations, including controls that are ongoing; d. Each IOU shall establish baselines for mitigation measures as follows: The baseline is a reference point in time at the start of the new GRC cycle. The baseline risk as applied to RAMP and GRC proceedings refers to the amount of residual risk evaluated at the baseline (i.e. at the start of the new GRC cycle) after taking into account all risk reduction benefits from all risk mitigation activities projected to have been performed by the start of the new GRC cycle. The R.20-07-013 projected risk mitigation activities include those that are classified by the IOUs as controls, as well as all mitigation activities for which the IOUs are seeking approval and/or funding in the current or upcoming RAMP and GRC applications; e. Each IOU shall include the cost of foundational programs in their mitigation RSE calculations if the aggregate cost over the upcoming GRC funding period of the foundational programs supporting a portfolio of risk mitigations exceeds the following: <ul style="list-style-type: none"> i. For PG&E and SCE, the lesser of \$10 million, or 20 percent of the cost of the portfolio of enabled mitigations, subject to a minimum of \$5 million for the percentage test; ii. For SDG&E, for its electric and other operations, the lesser of \$5 million, or 20 percent of the cost of the portfolio of enabled mitigations, subject to a minimum of \$2.5 million for the percentage test; iii. For SDG&E, for its gas operations, the lesser of \$2.5 million, or 20 percent of the cost of the portfolio of enabled mitigations, subject to a minimum of \$0.5 million for the percentage test; and, | Ordering Paragraph 1 | SCE-01, Vol. 2 |

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| | <ul style="list-style-type: none"> iv. For SoCalGas, the lesser of \$5 million, or 20 percent of the cost of the portfolio of enabled mitigations, subject to a minimum of \$1 million for the percentage test; f. Each IOU shall identify in its annual Risk Spending Accountability Report (RSAR) the costs for controls and/or mitigation measures and/or activities that were approved in prior GRC cycles but not implemented, as applicable; g. Each IOU shall incorporate the costs of foundational elements into the RSEs they present in their next RAMP filing, shall clearly and transparently explain and justify their chosen distribution of foundational costs to mitigations, and shall comply with applicable requirements of Decision (D.) 18-12-014 to explain their rationale and assumptions in categorizing foundational costs; and, h. Each IOU shall model Public Safety Power Shutoff (PSPS) events as risk events pursuant to requirements in D.18-12-014 | | |
| Resolution E-5167 Approves New Electric Vehicle (EV) Infrastructure Rules and associated Memorandum Accounts, pursuant to Assembly Bill 841 | | | |
| 8 | Within their annual reporting of costs within the Electric Vehicle Charging Infrastructure Cost and Load Reports, the investor-owned utilities must include a reference to which chapter of the GRC testimony the investor-owned utility will address the reasonableness of the costs cited. | Ordering Paragraph 10 | SCE-02, Vol. 8 |
| D.21-08-036 Decision on Test Year 2021 General Rate Case for Southern California Edison Company | | | |
| 9 | <p>SCE shall include in its next GRC filing a report on the number and percentage of residential utility disconnections and amount of arrearages during this GRC cycle, and an analysis of the impacts that any proposed rate increases would have on disconnections and arrearages. SCE’s report shall: (1) reflect consideration of approaches other than the Consumer Price Index to capture changes in purchasing power, such as use of nominal bills and rates (e.g., if there are minimal changes) or household income levels; and (2) present analyses based solely on bill variables. SCE is also not precluded from presenting any additional analyses of its choosing (Ordering Paragraph 11).</p> <p>In order for the Commission to comply with Section 718’s requirements in SCE’s next GRC, SCE shall include in its next GRC filing a report on the number and percentage of residential utility disconnections and amount of arrearages during this GRC cycle, and an analysis of the impacts that any proposed rate increases would have on disconnections and arrearages. SCE’s report shall: (1) reflect consideration of approaches other than Consumer Price Index (CPI) to capture changes in purchasing power, such as use of nominal bills and rates (e.g., if there are minimal changes) or household income levels; and (2) present analyses based solely on bill variables. SCE is also not precluded from presenting any additional analyses of its choosing (p. 29).</p> | Ordering Paragraph 11 and p. 29 | SCE-03, Vol. 1 |

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| 10 | While we appreciate the models serve different purposes, to the extent different models are used to evaluate the same risk and associated impact of various mitigation measures, SCE should include a qualitative explanation for any divergence between the model results and how the results support the proposed mitigations programs. Similarly, TURN's recommendation to include egress in the calculation of wildfire risk consequence would improve SCE's Risk management approach and is generally uncontested. To the extent this issue is not addressed in R.20-07-013, we direct SCE to incorporate egress, and other conditional risks as appropriate, in future RAMP and GRC risk modeling. | p. 37 | SCE-01, Vol. 02 |
| 11 | While we are cognizant that Risk Spend Efficiency (RSE) are not the only factor in the development and consideration of a prudent risk mitigation plan (which may be influenced by other factors, such as labor resources, technology, compliance requirements, planning, and construction lead time, etc.), it is SCE's responsibility to clearly and transparently explain its rationale for selecting the type and scale of risk mitigations, including how RSE calculations were considered. | p. 38 | This item is principally addressed in SCE-01, Vol. 2 but also in select places in OU-specific testimony as appropriate |
| 12 | <p>SCE is authorized to continue use of the Safety and Reliability Investment Incentive Mechanism with the modifications set forth in this decision (Ordering Paragraph 5).</p> <p>In the last several GRCs, the Commission has adopted some form of a Safety and Reliability Investment Incentive Mechanism (SRIIM) to require SCE to spend funds on safety and reliability as authorized or make refunds to ratepayers. SRIIM is comprised of two components: (1) hiring and maintaining a workforce of field employees that directly work on safety and reliability-related projects and programs, and (2) capital investment on core safety and reliability-related projects and programs.</p> <p>SCE proposes to continue the Safety and Reliability Investment Incentive Mechanism (SRIIM) with modifications to the headcount classifications, headcount target, headcount measurements, and capital investment component. We approve continued use of the (SRIIM) adopted in the 2018 GRC with the modifications discussed below (pp. 57-63).</p> <p>For the headcount target, Section 8.3.2 indicates that SCE's proposal "to increase the SRIIM headcount target from 2,175 to 2,465 workers" is adopted. However, consistent with the mechanism adopted in D.19-05-020 (SCE's 2018 GRC final decision), SCE also proposed to adjust the target headcount level by one-half the percentage change in requested versus authorized transmission and distribution (T&D) capital. This is also authorized in the 2021 GRC Track 1 Decision. Therefore, the headcount target reflected in the modified SRIIM tariff is set at 2,335 workers. SCE's proposed modification to headcount measurement was not adopted (SCE AL 4586-E, p. 3)</p> | Ordering Paragraph 5, pp. 57-63, and SCE AL 4586-E, p.3 | SCE-06, Vol. 4 |

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| 13 | <p>SCE is authorized to create a Memorandum Account to track costs related to the Distribution Energy Resources-Driven Grid Reinforcement Program (Ordering Paragraph 12).</p> <p>We agree it is appropriate to establish a memorandum account to track and record capital expenditures associated with the early stages of SCE’s DER-Driven Grid Reinforcement Program and authorize SCE to establish a memorandum account for this purpose. Given the high degree of uncertainty in the timing and magnitude of DER-driven reliability violations, we do not see a need to establish an associated capital expenditure “target” up to SCE’s currently requested 2021-2023 forecast. SCE bears the burden of demonstrating the reasonableness of any costs incurred for the DER-Driven Grid Reinforcement Program (p. 132).</p> <p>Authorizes the establishment of the Distributed Energy Resources (DER)-Driven Grid Reinforcement Program Memorandum Account to record the revenue requirement associated with SCE’s DER-Driven Grid Reinforcement Program covering the 2021-2024 period for future reasonableness review (SCE AL 4586-E, p. 3).</p> | <p style="text-align: center;">Ordering Paragraph 12, p. 132, and SCE AL 4586-E, p.3</p> | <p style="text-align: center;">SCE-02, Vol. 7</p> |
| 14 | <p>With respect to addressing the historical underspend, we find reasonable TURN’s recommended approach, accepted by SCE, of applying the Rule 20A Balancing Account balance to SCE’s forecasts for 2021-2024. We agree with TURN and SCE that this approach better aligns with the one-way balancing account mechanism. However, we find that the balance forecast by SCE should be updated to reflect 2019 recorded amounts (p. 152 - Section 14.2.2. Rule 20A Conversions).</p> <p>Approves the continued use of the one-way Rule 20A Balancing Account to track the annual capital and expense costs for Rule 20A undergrounding projects, which the Commission will review in SCE's next GRC (SCE AL 4586-E, p.3).</p> <p>On July 1, 2021, in accordance with OP 12 of D.21-06-013, SCE submitted Advice 4531-E to expand the existing Rule 20A Balancing Account to include the tracking of costs associated with Rule 20B and Rule 20C projects. In that advice letter (which also renamed the Rule 20A Balancing Account to the Rule 20 Balancing Account), SCE indicated that it would submit a subsequent advice letter to include the Rule 20 authorized amounts once a final decision was issued in Track 1 of SCE’s 2021 GRC proceeding. This advice letter includes the updated Rule 20A, Rule 20B, and Rule 20C authorized amounts.</p> | <p style="text-align: center;">p. 152 and SCE AL 4586-E, p.3</p> | <p style="text-align: center;">SCE-02, Vol. 8</p> |
| 15 | <p>We also approve SCE’s unopposed request to continue the two-way Pole Loading and Deteriorated Pole Programs Balancing Account (PLDPBA), which includes capital-related revenue requirements for the Pole Loading Program and Deteriorated Pole Program and operating expenses for the Pole Loading Program. Continuation of the PLDPBA ensures that any over- or under-collection for pole replacements pursuant to these</p> | <p style="text-align: center;">p. 163 and SCE AL 4586-E, pp. 3-4</p> | <p style="text-align: center;">SCE-02, Vol. 9</p> |

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| | <p>programs will be returned to, or recovered from, customers. As in the 2015 and 2018 GRCs, the level of expenditures to be recovered in the PLDPBA over the 2021 GRC period shall be capped at 115 percent above authorized levels (p. 163 - Section 15.2.1).</p> <p>Retains the existing two-way Pole Loading and Deteriorated Pole Balancing Account (PLDPBA), which includes capital-related revenue requirements for the Pole Loading Program and Deteriorated Pole Program and operating expenses for the Pole Loading Program, with no structural changes (SCE AL 4586-E pp. 3-4).</p> | | |
| 16 | <p>Within 30 days of the issuance of this decision, SCE shall file a Tier 1 advice letter to create a two-way Vegetation Management Balancing Account to track the difference between the expenses for vegetation management authorized in this decision and SCE’s recorded expenses for these activities. Recovery of any under collection that is less than 115 percent of the authorized amount as well as the refund of any overcollection, shall be filed via a Tier 2 advice letter. Recovery of costs in excess of 115 percent of the authorized amount for Vegetation Management shall be made by application (Ordering Paragraph 14).</p> <p>We approve SCE’s proposed two-way Vegetation Management Balancing Account (VMBA) along with a requirement that recovery of recorded costs in excess of 115 percent of the authorized amount for Vegetation Management Program (VMP) activities be made by application. For costs between 100 percent and 115 percent of the authorized amount, cost recovery may be made by a Tier 2 advice letter (p. 186).</p> <p>Authorizes the establishment of the two-way Vegetation Management Balancing Account to record the difference between (1) authorized O&M expenses for all vegetation management activities in this proceeding (i.e., Routine Transmission and Distribution Vegetation Management; Dead, Dying, and Diseased Tree Removal; and Wildfire Vegetation Management through the Hazard Tree Management Program) and (2) SCE’s recorded expenses for these activities. Cost recovery for amounts in excess of 115 percent of authorized amounts are to be requested by application. Recovery of any under collection that is less than 115 percent of the authorized amount, as well as the refund of any over collection, is to be requested via a Tier 2 advice letter (SCE AL 4586-E, p. 4).</p> | <p style="text-align: center;">Ordering Paragraph 14, p. 186, and SCE AL 4586-E, p. 4</p> | <p style="text-align: center;">SCE-02, Vol. 10</p> |
| 17 | <p>Therefore, as part of its next GRC filing, we direct SCE to further evaluate the interaction between its proposed wildfire mitigations, and whether costs can be reduced for ratepayers while still maintaining a consistent level of safety.</p> | <p style="text-align: center;">p. 203</p> | <p style="text-align: center;">SCE-04, Vol. 5</p> |
| 18 | <p>SCE shall include in its next GRC filing a presentation of how it leveraged the implementation of the grid hardening and modeling tools approved in this decision to better assess thresholds for initiating a Public</p> | <p style="text-align: center;">Ordering Paragraph 16, p. 204 and p. 233</p> | <p style="text-align: center;">SCE-04, Vol. 5</p> |

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| | <p>Safety Power Shutoff (PSPS) event, including a quantitative evaluation of how covered conductor has resulted in higher thresholds for initiating a PSPS event, broken down by Tier 2 and Tier 3 High Fire-Threat Districts, as well as an evaluation of how covered conductor has contributed to reductions in SCE’s historic PSPS frequency, scope, or duration (Ordering Paragraph 16).</p> <p>As part of its next GRC application, we direct SCE to present a quantitative evaluation of how covered conductor has resulted in higher thresholds for initiating a PSPS event, broken down by Tier 2 and Tier 3 HFTDs, as well as an evaluation of how covered conductor has contributed to reductions in SCE’s historic PSPS frequency, scope, or duration (p. 204).</p> <p>Given the importance of decreasing Public Safety Power Shutoffs (PSPS) events over time, we direct SCE to address as part of its next GRC filing how it has leveraged the implementation of grid hardening and modeling tools approved through this decision to better assess thresholds for initiating a PSPS event, including a quantitative evaluation of how covered conductor has resulted in higher thresholds for initiating a PSPS event, broken down by Tier 2 and Tier 3 HFTDs, as well as an evaluation of how covered conductor has contributed to reductions in SCE’s historic PSPS frequency, scope, or duration (p. 233).</p> | | |
| 19 | <p>Within 30 days of the issuance of this decision, SCE shall file a Tier 1 advice letter to create a two-way Wildfire Risk Mitigation Balancing Account to track the difference between the Wildfire Covered Conductor Program (WCCP) capital expenditures authorized in this decision and SCE’s recorded expenses for these activities. Recovery of any under collection that is less than 110 percent of the authorized capital expenditure amount, as well as the refund of any overcollection, shall be filed via a Tier 2 advice letter. Recovery of capital expenditures in excess of 110 percent of the authorized amounts for the WCCP shall be made by application. Should SCE file an application for cost recovery, SCE may request an expedited schedule to review its request pursuant to Rule 2.9 of the Commission’s Rules of Practice and Procedure (Ordering Paragraph 15).</p> <p>SCE is authorized to establish a two-way balancing account for the Wildfire Covered Conductor Program (WCCP), along with the requirement that SCE file an application for reasonableness review of any recorded costs in excess of 110 percent of the WCCP capital expenditure amounts authorized in this decision. Should SCE file an application for after-the-fact reasonableness review, the Commission will take into consideration SCE’s most current Wildfire Mitigation Plan (WMP) and corresponding wildfire risk analysis, and SCE may request an expedited schedule to review its request pursuant to Rule 2.9. Any under collection that is less than 110 percent of the amount authorized in</p> | OP 15, pp. 249-250, and SCE AL 4586-E, p.5 | SCE-04, Vol. 5 |

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| | <p>this decision, as well as the refund of any overcollection, shall be filed via a Tier 2 advice letter. We find the establishment of a two-way balancing account and application review process will accomplish many of the same ratepayer protections as TURN’s alternative balancing account plus memorandum account proposal (pp. 249-250).</p> <p>Authorizes the establishment of the two-way Wildfire Risk Mitigation Balancing Account to record the difference between (1) authorized capital expenditures for the Wildfire Covered Conductor Program (WCCP), (a) and (2) SCE’s recorded (actual) WCCP capital expenditures. (b) Cost recovery for amounts in excess of 110 percent of the authorized amounts are to be requested via application. (c) Recovery of any under collection that is less than 110 percent of the authorized amount as well as the return of any overcollection shall be submitted via a Tier 2 advice letter.</p> <p>(a) SCE is authorized to install 4,500 circuit miles of covered conductor over the 2019-2023 period. The 2021 GRC Track 1 Decision also adopts a cost recovery framework for additional cost at above the authorized expenditure amount for covered conductor, subject to additional reasonableness review prior to recovery from customers.</p> <p>(b) Pursuant to Public Utilities Code Section 8386.3(e), the first \$1.575 billion of wildfire risk mitigation capital expenditures spent after August 1, 2019 and included in SCE’s approved wildfire mitigation plans must be excluded from equity rate base and may be financed through a financing order pursuant to Section 851. As such, the WRMBA contains two subaccounts: a “WCCP Costs Not Subject to AB 1054” sub-account to track the capital-related revenue requirements for capital expenditures that are not subject to the AB 1054 exclusion from equity rate base, and a “WCCP Costs Subject to AB 1054” sub-account to track the capital-related revenue requirements that are subject to the AB 1054 exclusion from equity rate base.</p> <p>(c) Pursuant to OP 15 of the 2021 GRC Track 1 Decision, SCE may request an expedited schedule to review any such requests pursuant to Rule 2.9 of the Commission’s Rules of Practice and Procedure (SCE AL 4586-E, p.5).</p> | | |
| 20 | <p>In its next GRC filing, SCE shall evaluate whether waiving the requirement to submit pole loading calculations, or other similar process improvements, could be applied to third-party requests for pole attachments. For any proposed process improvement(s), SCE should consider whether there would be associated safety implications or additional costs borne by ratepayers (Ordering Paragraph 23).</p> <p>While we deny the September 9, 2020 motion by SCE and Conterra for approval of a settlement agreement (see Section 52.3), we take note that one of the terms of the proposed settlement is that Conterra not be</p> | Ordering Paragraph 23 and pp. 259-260 | SCE-02, Vol. 9 |

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| | <p>required to submit ongoing pole loading calculations with its requests for attachments. There is nothing in the record of this proceeding to indicate how waiving this requirement would impact safety or cost considerations, but the proposal appears consistent with the Commission’s recognition that a utility’s engineering studies should “avoid duplicative costly engineering analysis which could undermine the economic advantages of building a carrier’s own facilities.” Therefore, as part of the next GRC filing we direct SCE to evaluate whether this or similar process improvements could be applied to third-party requests for pole attachments. For any proposed process improvement(s), SCE shall consider whether there would be associated safety implications or additional costs borne by ratepayers (pp. 259-260)</p> | | |
| 21 | <p>SCE shall include in its next GRC filing an explanation of how its pole attachment fees comply with the requirement by the Federal Communications Commission that a utility charge “just, reasonable, and nondiscriminatory rates for pole attachments” when Edison Carrier Solutions competes directly with other telecommunications providers but is not subject to the same pole attachment fees (Ordering Paragraph 24).</p> <p>We direct SCE to include testimony with its next GRC application explaining how its pole attachment fees comply with the requirement that SCE charge just, reasonable, and nondiscriminatory rate for pole attachments when Edison Carrier Solutions (ECS) is not subject to these fees but competes directly with other telecommunications providers (p. 261).</p> | <p style="text-align: center;">Ordering Paragraph 24 and p. 261</p> | <p style="text-align: center;">SCE-02, Vol. 9</p> |
| 22 | <p>SCE shall include in its next GRC filing a summary of the meeting(s) held with the National Diversity Coalition to further develop the list of community-based organizations (CBOs) SCE currently uses for Customer Communications, Education, and Outreach, as well as a description of the specific communities SCE intends to target with in-language outreach (Ordering Paragraph 18).</p> <p>We find merit in National Diversity Coalition's (NDC) recommendations to improve outreach efforts to minority communities. SCE’s service area is home to some of the most diverse populations in the nation, where 20 percent of customers speak English less than “very well,” making it especially critical that SCE track and evaluate the effectiveness of its outreach efforts to minority communities. As discussed below, we believe NDC’s recommendations could be reasonably incorporated into existing operations and filings, but many would benefit from further development in SCE’s next GRC application (p. 284).</p> | <p style="text-align: center;">Ordering Paragraph 18 and p. 284</p> | <p style="text-align: center;">SCE-03, Vol.3</p> |
| 23 | <p>SCE shall include in its next GRC filing a description of how current American Community Survey data compares with more up-to-date information from the United States Census Bureau, whether SCE used the more up-to-date information, and why or why not (Ordering Paragraph 17).</p> | <p style="text-align: center;">Ordering Paragraph 17 and pp. 285-286</p> | <p style="text-align: center;">SCE-03, Vol. 3</p> |

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| | <p>We direct SCE to include testimony with its next GRC application describing how current American Community Survey (ACS) data compares with more up-to-date information from the U.S. Census Bureau, whether SCE used the more up-to-date information, and why or why not. In addition, while SCE already leverages Community Based Organizations (CBOs) and faith-based organizations to reach smaller ethnic groups, as an advocacy organization comprised of community-based, faith-based, and non-profit leaders, National Diversity Coalition (NDC) is well positioned to help SCE identify any CBOs that may be excluded from SCE’s outreach efforts. Therefore, we direct SCE to meet with NDC to further develop the list of CBOs currently utilized. SCE shall include a summary of the meeting(s), as well as a description of the specific communities SCE intends to target with in-language outreach, as part of its next GRC application (pp. 285-286).</p> | | |
| 24 | <p>SCE shall include in its next GRC filing cost estimates for the work that would be needed for SCE’s online and in-person Energy Center enrollment systems to be able to track participant demographic information (Ordering Paragraph 19).</p> <p>We direct SCE to include in its next GRC application specific cost estimates that would be needed for SCE’s online and in-person Energy Center enrollment systems to track demographic information. (p. 286).</p> | <p style="text-align: center;">Ordering Paragraph 19 and p. 286</p> | <p style="text-align: center;">SCE-03, Vol. 2</p> |
| 25 | <p>SCE shall include in its next GRC filing an estimate of the annual expenditures for operating the Energy Centers, broken down, at a minimum, by in-person and online offerings, and divided by the total number of events (seminars, workshops, classes, etc.) offered that year (Ordering Paragraph 20).</p> <p>As part of SCE’s next GRC filing, we direct SCE to provide an estimate of the annual expenditures for operating the Energy Centers, broken down (at a minimum) by in-person and online offerings, and divided by the total number of events (seminars, workshops, classes, etc.) offered that year. SCE should also provide an estimate of the average number of attendees enrolled in each event (p. 286-287).</p> | <p style="text-align: center;">Ordering Paragraph 20 and pp. 286-287</p> | <p style="text-align: center;">SCE-03, Vol. 2</p> |
| 26 | <p>If SCE’s existing Sprout Social system can accommodate the tracking of customer inquiries and complaints by language with minimal or no modifications, SCE shall begin tracking this information immediately; otherwise, SCE shall report the costs to modify its Sprout Social system to be able to track language information in its next GRC filing (Ordering Paragraph 21).</p> <p>Re: Escalated Complaints - To the extent the Sprout Social system can accommodate the tracking of this information with minimal or no modifications, we direct SCE to begin tracking this information immediately; otherwise, SCE shall report the costs to modify its Sprout</p> | <p style="text-align: center;">Ordering Paragraph 21 and p. 289</p> | <p style="text-align: center;">SCE-03, Vol. 1</p> |

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| | Social system to be able to track language information as part of its next GRC filing (p. 289). | | |
| 27 | <p>SCE shall report in its next GRC filing whether any of the third-party agricultural programs include pump services and shall alter its GRC funding request accordingly (Ordering Paragraph 22).</p> <p>Overall, we find SCE has provided reasonable assurances against the duplication of funding for Hydraulic Services and find the proposed level of funding to be reasonable. We also find the continuation of these services to be useful to agricultural and water customers in maintaining efficient pumping operations and performance. SCE is directed to report in its next GRC filing whether any of the third-party agricultural programs include pump services and alter its GRC funding request accordingly (p. 307).</p> | Ordering Paragraph 22 and p. 307 | SCE-03, Vol. 2 |
| 28 | As part of SCE’s next GRC application, we direct SCE to report how closely its current solar photovoltaic forecast compares with actual NEM solar applications received. | p. 310 | SCE-03, Vol. 3 |
| 29 | <p>SCE shall track how closely actual recorded project costs align with SCE’s 2019-2023 seismic cost estimate for the Mechanical Electrical Equipment Rooms and include this information in its next GRC filing (Ordering Paragraph 25).</p> <p>SCE is authorized to create a memorandum account to track seismic retrofit costs for its Non-Electric Facilities and may seek reasonableness review for any costs above the amount authorized in this decision in its next GRC filing. Because SCE lacks historic expenditures for projects of this size, we authorize SCE to establish a memorandum account to track non-electric facilities seismic retrofit costs with the opportunity to seek recovery for any costs above the amount authorized in this decision in SCE’s next GRC (Ordering Paragraph 26).</p> <p>SCE is directed to track how closely actual recorded project costs align with its 2019-2023 cost estimate for Mechanical Electrical Equipment Rooms (MEER) projects and include this information with any seismic funding requests in the next GRC (pp. 332-333).</p> <p>Authorizes the establishment of the Seismic Retrofit for Non-Electric Facilities Memorandum Account (per Ordering Paragraph 26) to track the revenue requirement associated with incremental non-electric facilities seismic retrofit costs with the opportunity for SCE to seek recovery of any incremental costs above the authorized amount in SCE's next GRC. General and Intangible (G&I) plant associated with the authorized revenue requirement are assigned using the Distribution labor allocator (SCE AL 4586-E - p. 5).</p> | Ordering Paragraphs 25, and 26 and pp. 332-333 | SCE-04, Vol. 1 |
| 30 | We do not preclude SCE from seeking additional recovery for San Gorgonio decommissioning activities in a future GRC. SCE will need to demonstrate that the forecast decommissioning work is likely to be | p. 355 | SCE-05, Vol. 1 |

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| | conducted during that GRC cycle and that its cost estimates are reasonable. SCE will also need to demonstrate that additional rate recovery for the project is reasonable despite the fact that the Commission has approved costs for the same scope of work in prior GRCs. | | |
| 31 | <p>Within 60 days of the issuance of this decision, SCE shall file a new application for review and approval of the Catalina Repower project (Ordering Paragraph 6).</p> <p>SCE is authorized to create a Catalina Repower Memorandum Account to track costs related to the Catalina Repower Project for possible future recovery following a reasonableness review in its next GRC (Ordering Paragraph 7).</p> <p>We direct SCE to submit a standalone application with its most up to date version of the Catalina Repower project proposal within 60 days of the issuance of this decision. Although the immediate focus of the application should be on Phase 1 and any actions needed to meet SCAQMD's January 1, 2023 deadline, SCE should also submit its proposal for the overall project for review. We also authorize SCE to create a Catalina Repower Memorandum Account to track costs related to the project for possible future recovery following a reasonableness review in the next GRC (pp. 362-363).</p> | Ordering Paragraphs 6, and 7 and pp. 362-363 | SCE-05, Vol. 1 |
| 32 | <p>In its next GRC, SCE shall report on its Supplier Diversity and Development (SDD) department's small business programming and outreach efforts undertaken during this GRC cycle (Ordering Paragraph 8).</p> <p>We direct SCE to report on Supplier Diversity and Development's (SDD) small business programming and outreach efforts undertaken during this GRC cycle in its next GRC (p. 391).</p> | Ordering Paragraph 8 and p. 391 | SCE-06, Vol. 3 |
| 33 | <p>SCE shall report on any use of alternative risk transfer instruments in place of traditional wildfire liability insurance during this rate case period, including the circumstances that warranted such use, in its next GRC for Commissions' Review (Ordering Paragraph 9).</p> <p>SCE is directed to report on any use of alternative risk transfer instruments during this rate case period, including the circumstances that warranted such use, in its next GRC for the Commission's review (p. 402).</p> | Ordering Paragraph 9 and p. 402 | SCE-06, Vol. 3 |
| 34 | <p>SCE shall include supporting testimony in its next GRC filing addressing the Non-Tariffed Products and Services (NTP&S) related issues and questions raised in this decision (Ordering Paragraph 28).</p> <p>We do not adopt any of TURN's NTP&S recommendations at this time; however, SCE is directed to include supporting testimony in its next GRC application addressing the following issues/questions:</p> | Ordering Paragraph 28 & p. 479 | SCE-07, Vol. 1 |

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| | <p>(1) Assuming TURN’s “but for” and time log tracking recommendations were implemented for ECS, provide an estimate of the level/number of utility resources that would be impacted, an associated cost estimate, as well as the supporting calculations.</p> <p>(2) Are there alternatives to TURN’s “but for” and time log tracking recommendations that would achieve similar objectives at a lower cost?</p> <p>(3) Concerning the HR services provided to ECS, provide a description of how ECS employee questions are assigned to, and addressed by, HR personnel (i.e., do ECS employees have an assigned HR specialist, and if so, does that HR specialist also oversee utility employees?).</p> <p>(4) Discuss whether ECS pays for office-related expenses (including utilities), why/why not, and how SCE’s current approach is consistent with the requirement that all incremental costs for NTP&S be the sole responsibility of shareholders (p. 479)</p> | | |
| 35 | <p>SCE shall conduct new decommissioning studies for Mountainview Generating Station, a representative peaker, and a representative solar plant for its next GRC (Ordering Paragraph 29).</p> <p>TURN also recommends that SCE conduct fresh decommissioning studies for Mountainview, a representative peaker, and a representative solar plant for its next GRC given that it is has been 10-18 years since the most recent studies. SCE agrees to undertake these additional studies (p. 528).</p> | Ordering Paragraph 29 and p. 528 | SCE-07, Vol. 3 |
| 36 | <p>If SCE seeks to continue this program [Disability Rights Compliance Program] in the next GRC, SCE should include as supporting documentation the annual reports prepared during this GRC cycle so that the Commission can better assess the accomplishments of the program and whether the spending is incremental and not duplicative of other approved funding.</p> | pp. 551-552 | SCE-09, Vol. 1 |
| 37 | <p>In its next GRC, SCE shall provide tables with at least five years of recorded spending information associated with each individual expense or expenditure forecast in excess of \$1 million. SCE shall also provide summary tables, aggregating this information at the level of major categories (e.g., Transmission and Distribution Infrastructure Replacement, Human Resources). SCE shall provide its own comparable forecast and the Commission’s adopted forecast from this GRC as a component of or accompaniment to these tables, both for individual forecasts and summary tables. SCE shall briefly explain any changes in scope of the forecasts, if they are not directly comparable. In the summary tables, SCE shall include any expenses or expenditures that were included in this GRC request, even if the individual expense or expenditure was not actually approved in this decision or implemented by SCE.</p> | Ordering Paragraph 36 | SCE-02, SCE-03, SCE-04, SCE-05, and SCE-06 |

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| D.21-05-037 Order Correcting Error in Decision 21-02-006 - Adopting DER Tariff | | | |
| 38 | Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company shall each track the costs of implementing Ordering Paragraph 8 in their Distribution Deferral Administrative Costs Memorandum Account and seek recovery in their respective GRC's. | Ordering Paragraph 9 | SCE-07, Vol. 1 |
| D.20-08-046 Energy Utility Climate Change Vulnerability Assessments | | | |
| 39 | Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall include in their GRC filings the main takeaways from the vulnerability assessments as a separate section or chapter that contains, at a minimum: 1) a list of vulnerabilities, 2) proposals addressing those vulnerabilities (with options), and 3) long-term goals for adapting to climate risks. | Ordering Paragraph 12 | SCE-01, Vol. 2 |
| D.20-06-003 Accepting Changes to Reduce CA Resident Disconnections | | | |
| 40 | Any costs associated with the Arrearage Management Plan should be addressed in the utilities next GRC. | p. 109 (Section 15.5.2) | SCE-03, Vol. 1 |
| 41 | Reconnection fees are eliminated effective with the date of this decision (Ordering Paragraph 16). Fee based revenue that was collected via reconnection fees may be addressed in the Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Gas Company's next general rate case and incorporated into base rates (Ordering Paragraph 17). The IOU is in violation of the reconnection fees requirement if it bills a residential customer a reconnection fee or charge before reconnecting service. Violation of the reconnection fees requirement is subject to a penalty of \$1,000 per affected customer (Ordering Paragraph 17). | Ordering Paragraphs 16 and 17 | SCE-03, Vol. 1 |
| 42 | SCE will seek review and recovery of amounts tracked in Residential Disconnections Implementation Cost Memorandum Account (RDICMA) Pursuant to D.20-06-003 in a GRC proceeding. In SCE AL-4284 (which was accepted by the CPUC), SCE proposes review and recovery in a GRC proceeding. | Ordering Paragraph 5 and SCE AL-4284 | SCE-03, Vol. 3 |
| 43 | Any costs associated with the AMP (Arrearage Management Payment Plan) should be addressed in the utilities next GRC. | p. 109 | SCE-03, Vol. 3 |
| D.19-05-020 2018 SCE GRC Decision | | | |
| 44 | SCE to establish a one-way Rule 20 balancing account that tracks the annual capital and expense costs for Rule 20A undergrounding projects, on a forecast and recorded basis to be reviewed in the next GRC proceeding. | Section 4.2.2, p. 40 | Advice Letter 4012-E established the Rule 20 balancing account SCE-03, Vol. 04 |

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| | | | Pt. 3 for review of recorded costs SCE-07, Vol. 01, Ch. IV, Section F for discussion of account |
| 45 | <p>SCE shall file a Tier 2 Advice Letter within 30 days of the effective date of this decision to establish a two-way tax memorandum account to record any revenue differences resulting from the income tax expenses forecasted in its GRC proceedings, and the tax expenses incurred by SCE during this 2018-2020 GRC period and each subsequent GRC period.</p> <p>a. This tax memorandum account shall remain open and the balance in the account shall be reviewed in every subsequent GRC until a Commission decision closes the account.</p> <p>b. The account shall have separate line items detailing the differences between tax expenses forecasted and tax expenses incurred, specifically resulting from 1) net revenue changes, 2) mandatory tax law changes, tax accounting changes, tax procedural changes, or tax policy changes, and 3) elective tax law changes, tax accounting changes, tax procedural changes or tax policy changes.</p> <p>c. SCE may track changes in revenue resulting from the application of the Average Rate Assumption Method in accordance with this decision in the Tax Memorandum Account.</p> | Ordering Paragraph 5 | SCE-07, Vol. 2 |
| 46 | In future GRCs, SCE shall include evidence demonstrating SCE's commitment to minority outreach and measuring its effectiveness. | Ordering Paragraph 20 | SCE-03, Vol. 3 |
| D.19-04-020 Phase Two Adopting Risk Spending Accountability Report Requirements and Safety Performance Metrics for Investor-Owned Utilities and Adopting a Safety Model Approach for Small and Multi-Jurisdictional Utilities | | | |
| 47 | SCE shall file each annual Risk Spending Accountability Report (RSAR) in the utility's current or most recent Risk Assessment Mitigation Phase (RAMP) and GRC proceeding at the time of filing as well as the RAMP/GRC that approved the risk spending. | Ordering Paragraph 8 | SCE-01, Vol. 2 |
| D.19-01-018 Phase 1 Decision on OIR Re: The Physical Security of Electrical Corporations | | | |
| 48 | Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison, PacifiCorp, Bear Valley Electric Service, and Liberty CalPeco (collectively, IOUs) shall seek recovery of costs associated with their respective Distribution Security Programs in each IOU's GRC. | Ordering Paragraph 30 | SCE-02, Vol. 1, Part 2 |
| Resolution E-4982 Approves Updates to Grid Modernization Classification Tables | | | |
| 49 | The IOUs shall include the common Grid Modernization Classification Table as part of the Grid Modernization Plan with references included to the sections of their GRC, unless the IOUs file a Tier 2 Advice Letter to modify the table 60 days prior to the submission of their GRC Application. | Ordering Paragraph 3 | SCE-02, Vol. 6 |

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| 50 | The IOUs shall provide reference in their Grid Modernization Plans to all technologies included in the table, which include, but are not limited to, all technologies listed as examples in the Grid Modernization Classification Tables. | Ordering Paragraph 4 | SCE-02, Vol. 6 |
| Resolution M-4835 Emergency Authorization and Order Directing Utilities to Implement Emergency Consumer Protections Related to the December 2017 CA Wildfire to Support Residential and Non-Residential Customers | | | |
| 51 | SCE, SoCalGas, and SDG&E must each establish or amend a Wildfires Customer Protections Memorandum Account (WCPMA) to book costs associated with protections ordered by this Resolution which are incurred starting with the date of the December 2017 fires in each utility's respective territory. The utilities may seek recovery of costs in the WCPMA in a GRC or other appropriate ratemaking proceeding. | Ordering Paragraph 4 | SCE-07, Vol. 01, Ch. V, Section B.1 |
| D.18-12-014 Phase Two Adopting Safety Model Assessment Proceeding (S-MAP) Settlement Agreement with Modifications | | | |
| 52 | SCE shall file its next Risk Assessment and Mitigation Phase (RAMP) adhering to the minimum standards set in D.18-12-014. Attachment A sets forth the minimum required elements to be used by the large Utilities for risk and mitigation analysis in the RAMP and GRC. Attachment A, Global Items, p. A-14 (Items No. 26, 28, and 29) | Ordering Paragraph 2 | SCE-01, Vol. 2 |
| D.18-06-010 Modifying D.16-12-036 Addressing Competitive Solicitation Framework and Utility Regulatory Incentive Pilot | | | |
| 53 | Decision 16-12-036 is modified to add the following language to page 61 before the paragraph beginning with the words, "In comments to the ruling...": However, we have determined that double recovery of authorized funds could occur if a utility uses the funds for the previously authorized distribution capital project during the course of the GRC years and simultaneously tracks spending in the balancing account for the Pilot project during the same years. Accordingly, for DER projects that defer a specific investment, which has been explicitly approved in a GRC and is included in the GRC revenue requirement, we direct the Utilities to recover the cost of the Pilot projects through the GRC revenues and prohibit the Utilities from recording payments for the Pilot projects to the balancing account. This cost recovery denial only applies through the DER contract period during which the utility collects a revenue requirement for the approved traditional investment. In the instance where the Commission approves the deferral or avoidance of an explicitly approved traditional investment in the most recent GRC, the Utilities should be made whole for any distributed energy resources payments above what they are collecting in GRC revenues through distribution rates. For Pilot projects providing for procurement of energy, capacity, resource adequacy products and ancillary services, the Utilities are authorized to record these costs for recovery in the Energy Resource and Recovery Accounts. Additionally, | Ordering Paragraph 2 | SCE-07, Vol. 01, Ch. V., Section B.2 |

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| | the confidential reporting and Tier Two Advice Letter process set forth in Ordering Paragraphs 2.dd and 2.ee of Decision 18-01-012 shall also apply to this Pilot. | | |
| 54 | Decision 16-12-036 is modified to add a new Finding of Fact, Finding of Fact 113, as follows: Double recovery of authorized funds could occur if a utility uses the funds allocated to the previously authorized distribution capital project during the GRC years and simultaneously tracks spending in the balancing account for DER projects that defer or avoid a specific investment, which has been explicitly approved in a GRC and is included in the GRC revenue. | Ordering Paragraph 3 | SCE-07, Vol. 01, Ch. V., Section B.1 |
| 55 | Decision 16-12-036 is modified to add a new Conclusion of Law, Conclusion of Law 21, as follows: It is reasonable to require the Utilities to recover the cost of the Pilot projects through the GRC revenues for distributed energy resources projects that defer or avoid a specific investment, which has been explicitly approved in a GRC and is included in the GRC revenue, in order to protect ratepayer funding. | Ordering Paragraph 4 | SCE-07, Vol. 01, Ch. V., Section B.1 |
| 56 | Decision 16-12-036, Ordering Paragraph 23, is revised to add the following language: For the distributed energy resources projects that defer a specific investment, which has been explicitly approved in a GRC and is included in the GRC revenue requirement, a utility shall recover these costs through the GRC revenues and shall not record payments for the corresponding Pilot project to the balancing account. Such cost recovery denial only applies through the DER contract period during which the utility collects a revenue requirement for the approved traditional investment. | Ordering Paragraph 5 | SCE-07, Vol. 01, Ch. V., Section B.1 |
| D.18-03-023 Track 3 Policy Issues, Sub-Tack 2 (Grid Modernization) | | | |
| 57 | The IOUs, in their GRC filings on grid modernization, shall use the tools developed in the Distribution Resources Plan proceeding to present the level of distributed energy resource penetration system integration challenges that are expected to arise on the grid, and what the most cost-effective mitigation options or investments are. Specifically, <ul style="list-style-type: none"> • The IOUs shall apply the Distribution Resources Plan planning tools to inform and justify GRC-proposed grid modernization spending related to Distributed Energy Resources integration. • The IOU's Grid Modernization Plan (GMP) included in its GRC must explain the rationale for the proportion of investment that can be attributed to DER integration, safety, or reliability. | Ordering Paragraph 4 | SCE-02, Vol. 6 |

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| | <ul style="list-style-type: none"> • In order to assess the long-term costs of DER integration, the IOUs shall identify the primary driver of the grid need: whether the forecasted deficiency is primarily a result of DER growth, demand growth, equipment replacement, or other factor. <p>The IOUs shall explain the basis for determining the locations where each type of grid modernization investment is needed. We require that the IOUs' GMP use information from Distribution Resources Plan tools to support their rationale for a given investment.</p> <ul style="list-style-type: none"> • The IOUs shall present their GMPs in the GRC for review and evaluation. • Each IOU shall present a 10-year vision for its GMP in order to provide context for its GRC-specific GMP request. The 10-year vision shall include the changes an IOU anticipates necessary to the distribution system in light of the long term Distributed Energy Resources growth forecast. The IOUs shall include the 10-year vision as a chapter in their GRC filings. <p>In their GRCs, the IOUs shall propose the lowest cost approach to meeting identified grid needs while also maximizing DER benefits and should provide an explanation for the drivers of each type of investment. The GMP shall also discuss whether any of the proposed distribution investments in the GMP could otherwise be met by DERs.</p> | | |
| 58 | <p>The IOUs shall identify the drivers of grid needs in the Grid Needs Assessment and propose the most appropriate method to quantify the DER integration costs to incorporate into the Locational Net Benefit Analysis.</p> <p>The IOUs shall file their GMP as a chapter in their GRC filings to include the information listed in Appendix A.</p> | Ordering Paragraph 7 | SCE-02, Vol. 6 |
| 59 | <p>IOUs shall use consistent accounting codes that are clearly defined and provide reference to any past accounting codes for related investments. We direct the IOUs to develop such accounting codes and provide this reference within their Grid Needs Assessments.</p> | Ordering Paragraph 8 | SCE-02, Vol. 6 |
| 60 | <p>This guidance will first apply to PG&E's Test Year 2020 GRC, and to each IOU's subsequent GRC, unless otherwise ordered by the ALJ or assigned Commissioner in an open GRC proceeding.</p> | Ordering Paragraph 9 | SCE-02, Vol. 6 |
| D.18-02-004 Decision on Track 3 Policy Issues, Sub-Track 1 (Growth Scenarios) and Sub-Track 3 - (Distribution Investment and Deferral Process) | | | |
| 61 | <p>The information each IOU presents in its GRC testimony shall be consistent with that which the IOU presents in that year's GNA and DDOR reports, while affirming the IOU's ability to update any aspect of its GRC testimony due to emergent needs or changing forecasts that arise following that year's GNA and DDOR filings. The IOUs must explain any discrepancies between the GNA and DDOR reports and GRC testimony within the GRC testimony.</p> | Ordering Paragraph 2.h | SCE-02, Vol. 6 |

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| 62 | <p>The Commission orders that the GNA and DDOR filed the year after a GRC filing year is inadmissible in the evidentiary record of that GRC proceeding and may not be used to update the underpinning assumptions of GRC testimony that was filed the previous year. We agree to continue the ratemaking treatment adopted in D.16-12-036, wherein the IOUs shall track DER contract payments in the existing IDER Incentives Pilot balancing account-which shall be repurposed as Distribution Deferral balancing accounts-for recovery in the GRC, and DER incentive payments tracked in a balancing account for recovery in ERRA.</p> <p>We further affirm that neither DER payments nor the avoided costs of traditional investments shall be reduced from the previously adopted revenue requirement. We clarify that this ratemaking treatment does not preclude the Commission’s ability to reduce an IOU’s revenue requirement request in an open GRC application in the instance where an IOU includes a specific project in its distribution capital request, while at the same time that project is being considered as a candidate deferral project.</p> | Ordering Paragraph 2.i | SCE-02, Vol. 6 |
| 63 | <p>We prohibit utilities from recovering costs for the same project more than once (double recovery). In the instance that the Commission approves a DER project to defer a specific investment that has been explicitly approved in the most recent GRC and is included in the GRC revenue requirement, the utility may recover these costs through GRC revenues, and may not book payments for the corresponding DER project to the Distribution Deferral balancing account. Such cost recovery denial only applies through the DER contract period during which the IOU collects a revenue requirement for the approved traditional investment.</p> | Ordering Paragraph 2.bb | SCE-02, Vol. 6 |
| 64 | <p>The Commission orders the IOUs to file confidential reports to the Commission containing itemized data on payments made to contracted DER projects versus the estimated traditional spending such deferral projects were able to avoid.</p> <p>The IOUs may compute such estimates based on unit costs and typical depreciation schedules for given asset types. These reports will be due concurrently with an IOU’s Distribution Deferral Opportunity Report (DDOR) submission in its GRC filing years.</p> | Ordering Paragraph 2.dd | SCE-02, Vol. 6 |
| 65 | <p>If the IOUs demonstrate to the Commission in their confidential DER payment reports that a DER project is more expensive than an explicitly approved traditional project due to differences in depreciation schedules versus DER contract payments, the IOUs may file a Tier 2 advice letter requesting that the outstanding differential be added to the Distribution Deferral balancing account for recovery within that year’s GRC application.</p> | Ordering Paragraph 2.ee | SCE-02, Vol. 6 |
| 66 | <p>The Commission orders the establishment of a distribution capital per customer metric, which shall be calculated in each IOUs’ GRC filing year and submitted as part of the DDOR.</p> | Ordering Paragraph 2.ff | SCE-02, Vol. 6 |

Table II-1
Southern California Edison Company
2025 General Rate Case (GRC)
Reporting and Compliance Items

| Item No. | Action Required | Source Citation Reference | Compliance Action/Status |
|--|---|---|---------------------------------------|
| D.16-11-022 Decision on Large Investor-Owned Utilities' California Alternate Rates for Energy (CARE) and Energy Saving Assistance (ESA) Program Applications | | | |
| 67 | SCE shall include cooling center costs in their GRC Proceedings going forward. SCE is authorized to continue to utilize California Alternate Rates for Energy Program administrative dollars for cooling center activity, only until SCE's next GRC. As a pilot while the cooling center budget is being funded by CARE prior to consideration in the next GRC, SCE may fund water, basic snacks, and transportation through the CARE program consistent with their applications. | Ordering Paragraph 116 and pp. 9, 333-338 | SCE-03, Vol. 3 |
| D.16-08-018 Interim Decision Adopting the Multi-Attribute Approach (or Utility Equivalent Features) and Directing Utilities to Take Steps Toward a More Uniform Risk Management Framework | | | |
| 68 | SCE shall remove shareholders' financial interests from consideration in its risk models and decision frameworks used to support rate case expenditure proposals, especially at the operational level, unless the utility can make a good case for an exception in its Risk Assessment Mitigation Phase filing. | Ordering Paragraph 6 | SCE-01, Vol. 2 |
| D.15-11-021 2015 SCE GRC Decision | | | |
| 69 | In the event that SCE receives a relevant IRS ruling contradicting this decision, then it shall comply with the IRS's interpretation of the applicable tax laws by filing a Tier 2 advice letter with this Commission to seek an appropriate adjustment to its revenue requirement and/or rate base. | Section 22.2.4 p. 452 | SCE-07, Vol. 02 Ch. IV |
| 70 | In future GRC's, SCE should provide clear unit cost forecast information for the major types of equipment relevant to this topic [system planning capital projects]. SCE should clearly present the number of units required for each project or program so that the total cost forecast for the project or program can be compared to the sum of the unit costs. | Section 7.3 p. 53 | SCE-02, Vol. 7 |
| 71 | Therefore, in future GRCs, we find it reasonable to require SCE to include its own forecast and the Commission's adopted forecast from the previous GRC alongside historical costs, and brief explanations detailing any changes in the scope of a category. | Section 9.2.2 p. 224 | SCE-6, Vol. 2 |
| 72 | SCE can and must do more to explain and justify its use of judgement in its depreciation showing. an expert witness must be able to explain the quantitative or qualitative basis for such application of judgement, in any specific instance ... An adequate showing will avoid statements of judgement without supporting analysis or explanation. | Section 21.1 p. 397 | SCE-07, Vol. 02, Ch. II, Section H |
| D.14-12-025 Incorporating a Risk Based Decision-Making Framework into the Rate Case Plan and Modifying Appendix A of D.07-07-004 | | | |
| 73 | Beginning February 1, 2015, SCE shall use the risk-based decision-making framework described in this decision in its GRC applications going forward. | Ordering Paragraph 3 | SCE-01, Vol. 02 |
| D.14-03-021 Issues Concerning Voluntary Conversion of Electric and Natural Gas Master-Metered Service at Mobile Home Parks and Manufactured Housing Communities to Direct Service by Electric and/or Natural Gas Corporations | | | |

Table II-1
Southern California Edison Company
2025 General Rate Case (GRC)
Reporting and Compliance Items

| Item No. | Action Required | Source Citation Reference | Compliance Action/Status |
|--|--|---------------------------|--|
| 74 | Each electric and/or gas corporation is authorized to fully recover in distribution rates the costs of the conversion program approved in Ordering Paragraph 2, subject to reasonableness review. The following ratemaking is approved: actual, prudently incurred program costs shall be entered in a balancing account for recovery in the first year following cut over of service; “to the meter” construction costs must be capitalized based on actual (not forecast) expenditures at the utility’s then-current authorized return on rate base; “beyond the meter” construction costs must be capitalized based on actual (not forecast) expenditures and consistent with their status as a regulatory asset, these costs must be amortized over ten years at a rate equivalent to the utility’s then-current authorized return on rate base. Review for reasonableness of “to the meter” costs will occur in the GRC where those costs are put into rate base. Review for reasonableness of “beyond the meter” costs will occur in the first GRC after service cut over. | Ordering Paragraph 8 | SCE-07, Vol.01, Ch. VC |
| D.12-11-051 2012 SCE GRC Decision | | | |
| 75 | SCE shall continue reporting on workforce composition in its GRC, modified to include a 10-year comparison by job classification and an explanation of steps SCE has taken to ensure top management leadership development for underrepresented groups. | Ordering Paragraph 28 | SCE-06, Vol. 04 |
| 76 | In its GRCs, SCE should establish that proposed capital projects are necessary and that SCE has prudently examined alternatives for cost-effectiveness before seeking Commission approval. | Conclusions of Law 4 | SCE-02 through SCE-06 SCE’s testimony on capital projects addresses the need for the project, the costs of the project, and where applicable, the alternatives considered |
| 77 | In future GRCs, SCE must clearly explain why new employees must be hired during a test year and the relationship of the timing of new hires to SCE’s provision of safe and reliable delivery of service. | Conclusions of Law 33 | SCE-05, Vol. 01, Ch. II, Section B |
| 78 | SCE should carefully document the data collection from the Cable-in-Conduit (CIC) pilot program, as well as other efforts it undertakes to develop a best practice and most cost-effective method for replacements. This information shall be submitted in support of future GRC requests in this category to assist the Commission and to illustrate that ratepayers achieved value from SCE’s “lessons learned”. | Conclusions of Law 106 | SCE-02, Vol. 01, Part 2 |
| 79 | SCE should document the B-Bank transformer replacements performed in this rate cycle and submit the names, locations, and ages of the replaced transformers in support of future GRC requests in this category. | Conclusions of Law 110 | SCE-02, Vol. 5 |

Table II-1
Southern California Edison Company
2025 General Rate Case (GRC)
Reporting and Compliance Items

| Item No. | Action Required | Source Citation Reference | Compliance Action/Status |
|--|--|---------------------------|--|
| 80 | SCE is directed in Section 2.5 of the 2012 GRC to include an exhibit in future rate cases that facilitates public tracking of large distribution projects authorized in a prior GRC. | Page 69 | SCE-02, Vol. 7 |
| D.12-05-037 Establishing Purposes and Governance for Electric Program Investment Charge and Establishing Funding Collections for 2013-2020 | | | |
| 81 | <p>PG&E, SDG&E, and SCE shall no longer include technology demonstration and deployment expenditures in their GRCs unless specifically directed by the Commission to do so in a proceeding related to the Electric Program Investment Charge (EPIC). The investment plans for the EPIC program shall become the primary vehicle for considering utility proposals for electric research, development, and deployment (RD&D) purposes.</p> <p>If PG&E, SDG&E, or SCE propose other such expenditures outside of the EPIC investment plans, the utility will face a burden to explain why such expenditures could not have been considered within the EPIC program. Any such requests should explain how they meet objectives and metrics of the EPIC program. Any such applications shall be filed on the service list of the most recent EPIC proceeding and the most recent GRC proceeding of the relevant utility.</p> | Ordering Paragraph 17 | SCE has not included any technology demonstration and deployment expenditures in its GRC application |
| D.11-07-056 Adopting Rules to Protect the Privacy and Security of the Electricity Usage Data of the Customers of PG&E, SCE & SDG&E Attachment D | | | |
| 82 | Each electrical corporation shall conduct an independent audit of its data privacy and security practices in conjunction with GRC proceedings following 2012 and at other times as required by order of the Commission. The audit shall monitor compliance with data privacy and security commitments, and the electrical corporation shall report the findings to the Commission as part of the utility's GRC filing. | Attachment D, Section 9.d | SCE-03, Vol. 1 |
| D.98-07-077 Interim Decision regarding Southern California Edison's Distribution Performance-Based Ratemaking Mechanism | | | |
| 83 | It is reasonable to hold Edison to its recent corporate goals regarding telephone response standards and to require that 75% of calls be answered within 50 seconds, for 90% of the weeks during the year. | p. 13 | SCE-03, Vol. 1 |