

Application No.: A.23-05-010
Exhibit No.: SCE-14 Vol. 01
Witnesses: R. Archer
A. Baldwin
L. Blackwell
C. Garcia
C. Hu
E. Quon



(U 338-E)

**2025 General Rate Case
Rebuttal Testimony**

Customer Service Operations

Before the
Public Utilities Commission of the State of California

Rosemead, California
April 15, 2024

SCE-14 Vol. 01: Customer Service Operations

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I.

INTRODUCTION

In this exhibit, Southern California Edison (SCE) provides additional support for its Test Year (TY) 2025 forecast of operations and maintenance (O&M) expenses, 2023-2025 capital expenditures, and Other Operating Revenue (OOR) for its Customer Interactions Business Planning Group (BPG). Customer Interactions BPG activities are primarily managed by the Customer Service organization. If approved, this funding request will allow SCE to continue its interactions with customers and to meet customers' needs and expectations for customer service, including educating customers about how their energy usage impacts their bill, billing customers in an accurate and timely manner, responding to customer requests for service, and addressing customer questions and concerns. It will also help SCE achieve state and federal energy policy goals that rely on customer participation in rates and programs, and educate external audiences on a range of topics including safety, outages and storms, and clean energy initiatives to meet the state's goals.

This volume discusses the following Business Planning Elements (BPEs): Billing and Payments in Chapter II and Customer Contacts in Chapter III. In addition, 2022-2024 O&M and capital expenditures supporting the Customer Service Re-Platform (CSR) are discussed in Chapter IV. OOR Service Fees are discussed in Chapter V. Lastly, in Chapter VI, SCE addresses testimony provided by the California Community Choice Association (CalCCA) regarding various billing practices and policies.

The purpose of this testimony is to address the various recommendations raised by California Public Advocates Office (Cal Advocates), The Utility Reform Network (TURN), and CalCCA related to SCE's proposals for Customer Interactions in Exhibit SCE-03, Volume 1 for O&M expenses and OOR for the 2025 TY and capital expenditures for 2023 through 2025.

Cal Advocates contests SCE's O&M forecast for Billing Services and Customer Contact Center, SCE's capital expenditures forecast for Mailing Operations, and SCE's proposed paper bill fee. TURN contests SCE's O&M forecast for Billing Services and Customer Contact Center. CalCCA contests SCE's proposed Community Choice Aggregation fees and OOR forecast, and provides testimony on SCE's billing practices and policies. As discussed in this volume, the positions of Cal Advocates, TURN, and CalCCA should be rejected.

1 **A. Summary Of Rebuttal Position**

2 The forecasts for Customer Interactions Exhibit SCE-03, Volume 1 O&M expense, OOR, and
 3 capital expenditures made by SCE, Cal Advocates, TURN, and/or CalCCA are shown in the following
 4 tables.

5 Table I-1 provides a summary of the Billing and Payments and Customer Contacts 2025 O&M
 6 expense forecast for SCE, Cal Advocates, and TURN, along with the variances from SCE’s forecast.

***Table I-1
 Billing & Payments and Customer Contacts
 2025 O&M Forecast
 Summary of SCE, Cal Advocates, and TURN Positions
 (2022 Constant \$000)***

Line No.	Business Planning Element	2025 Forecast			Variance from SCE		SCE Rebuttal Position
		SCE	Cal Advocates	TURN	Cal Advocates	TURN	
1	Billing & Payments	76,035	71,646	71,438	(4,389)	(4,597)	72,908
2	Customer Contacts	59,343	51,343	50,728	(8,000)	(8,615)	53,469
3	Total	135,378	122,989	122,166	(12,389)	(13,212)	128,760

7 Table I-2 provides a summary of the Billing and Payments 2023-2025 capital expenditure
 8 forecast by SCE, Cal Advocates, and TURN, along with the variances from SCE’s forecast.

***Table I-2
 Billing & Payments
 Capital Expenditures 2023-2025 Forecast
 Summary of SCE, Cal Advocates, and TURN Positions
 (Nominal \$000)***

Line No.	Billing & Payments	2023 - 2025 Forecast			Variance from SCE		SCE Rebuttal Position
		SCE	Cal Advocates	TURN	Cal Advocates	TURN	
1	Mailing Operations	5,287	3,442	N/A	(1,845)	N/A	5,545
2	Software Automation	1,750	1,750	N/A	0	N/A	1,750
3	Total	7,037	5,192	N/A	(1,845)	N/A	7,295

9 Table I-3 provides a summary of Customer Interactions TY forecast for OOR for SCE, Cal
 10 Advocates, and CalCCA along with the variances from SCE’s forecast.

Table I-3
Customer Interactions
2025 OOR Forecast
Summary of SCE, Cal Advocates and CalCCA Positions
(Nominal \$000)

Line No.	Activity	2025 Forecast					Variance from SCE		SCE Rebuttal Position
		SCE Application	SCE Adjustment	SCE Revised Forecast	Cal Advocates	CalCCA	Cal Advocates	CalCCA	
1	Paper Bill Fee - Residential	7,553	-	7,553	0	N/A	(7,553)	N/A	7,553
2	Late Payment Charge - Residential	7,374	-	7,374	7,374	N/A	0	N/A	7,374
3	Connection Charge - Residential	-	-	-	-	N/A	-	N/A	-
4	Opt-Out CARE - Initial	0	-	0	0	N/A	0	N/A	0
5	Opt-Out NON-CARE - Initial	1	-	1	1	N/A	0	N/A	1
6	Opt-Out CARE - Monthly	14	-	14	14	N/A	0	N/A	14
7	Opr-Out NON-CARE - Monthly	264	-	264	264	N/A	0	N/A	264
8	Paper Bill Fee - Non-Residential	1,864	-	1,864	0	N/A	(1,864)	N/A	1,864
9	Late Payment Charge - Non-Residential	3,933	-	3,933	3,933	N/A	0	N/A	3,933
10	Connection Charge - Non-Residential	-	-	-	-	N/A	-	N/A	-
11	Returned Check Charge	1,195	-	1,195	1,195	N/A	0	N/A	1,195
12	Connection Charge - At Pole	31	-	31	31	N/A	0	N/A	31
13	Optimal Billing Period	8	-	8	8	N/A	0	N/A	8
14	Misc. Revenue - Recovery Unauthorized Use Non-Energy	121	-	121	121	N/A	0	N/A	121
15	Customer Information Service Request (CISR) Fees	318	-	318	318	N/A	0	N/A	318
16	Community Choice Aggregation	5,723	(513)	5,210	5,210	1,972	0	(3,238)	5,203
17	Direct Access Services	707	(4)	703	707	N/A	0	N/A	703
18	Total	29,107	(517)	28,589	19,176	1,972	(9,417)	(3,238)	28,582

1. O&M Forecast Summary

Table I-4 provides the recorded amounts for 2018-2022 and the forecast for 2025 for SCE. For the Customer Interactions Exhibit SCE-03, Volume 1 O&M forecast, Cal Advocates and TURN proposed changes to SCE's forecasts in multiple BPEs. SCE will address the issues raised by Cal Advocates and TURN related to SCE's 2025 O&M forecast in the below corresponding chapters.

Table I-4
Billing & Payments and Customer Contacts
2018-2022 Recorded/2025 Forecast
Summary of SCE Position
(2022 Constant \$000)

Line No.	Business Planning Element	SCE Recorded					SCE Rebuttal Position
		2018	2019	2020	2021	2022	
1	Billing & Payments	73,825	76,752	77,131	67,805	71,515	72,908
2	Customer Contacts	54,832	50,575	48,481	58,422	44,172	53,469
3	Total	128,657	127,327	125,612	126,227	115,687	128,760

1 **2. Capital Expenditure Summary**

2 Table I-5 provides the recorded amounts for 2018-2023 and the forecast for 2024-2025
3 for SCE. For the Billing and Payments Capital Expenditures forecast, Cal Advocates proposed changes
4 to SCE’s forecast for its Mailing Operations project. TURN stayed silent on Billing and Payments
5 capital requests. SCE will address the issues raised by Cal Advocates below.

***Table I-5
Billing & Payments Capital Expenditures
2018-2023 Recorded/2024-2025 Forecast
Summary of SCE Position
(Nominal \$000)***

Line #	Billing & Payments	SCE Recorded					SCE Rebuttal Position		
		2018	2019	2020	2021	2022	2023 Recorded	2024 Forecast	2025 Forecast
1	Mailing Operations	-	-	-	178	6	5,420	125	-
2	Software Automation	-	-	628	-	-	-	-	1,750
3	Total	-	-	628	178	6	5,420	125	1,750

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II.

BILLING AND PAYMENTS

A. O&M Expenses

1. SCE Application

The Billing and Payments BPE includes the Billing, Postage, Credit and Payment Services, and Uncollectible Expenses GRC Activities. SCE delivers approximately 65.9 million billing statements (printed and electronic), notices, reminders, and other correspondence to customers each year. Collections activities are necessary to minimize uncollectible expenses, and payment services are essential to provide in-person, mail-in, and electronic payment options that are convenient and cost effective for customers.

The Billing and Payments BPE TY O&M forecast of \$76.034 million is based on 2022 recorded¹ and incremental adjustments in the Billing, Postage, and Credit and Payment Services GRC Activities. Table II-6 below provides SCE's 2025 rebuttal position forecasts for the Billing and Payments BPE's GRC Activities of Billing Services, Credit and Payment Services, Postage, and Uncollectible Expenses. In addition, Table II-6 includes the 2025 forecasts for Cal Advocates and TURN along with the variance compared to SCE's revised forecast.

¹ The forecast for postage is based on 2022 bill volumes, 2019 notice volumes, and 2018-2021 average letters volume. See Ex. SCE-03, Vol. 01 pp. 34-37 for details.

Table II-6
Billing & Payments
2025 Forecast
Summary of SCE, Cal Advocates, and TURN Positions
(2022 Constant \$000)

Line No.	Billing & Payments	2025 Forecast			Variance from SCE	
		SCE Rebuttal Position	Cal Advocates	TURN	Cal Advocates	TURN
1	Billing Services	47,394	46,133	45,925	(1,261)	(1,469)
2	Postage	12,616	14,988	N/A	N/A	N/A
3	Credit & Payment Services	12,897	12,897	N/A	N/A	N/A
4	Uncollectibles Factor*	0.191%	0.191%	N/A	N/A	N/A
5	Total	72,907	74,018	N/A	N/A	N/A

* The Uncollectibles factor is not part of the Total Line 5.

2. Billing Services

For the Billing Services GRC activity, the TY O&M application forecast of \$48.150 million includes increases of \$1.071 million for Net Energy Metering (NEM) Application Processing,² \$0.374 million for a Productivity Tracking Initiative,³ \$0.187 million for Customer Solutions Integration,⁴ \$0.341 million for Move-Ins and Move-Outs,⁵ and \$1.672 for changes to the Employee Compensation Program⁶ applicable across the company, as well as a reductions of \$0.930 million for Operational Efficiency measures,⁷ \$0.248 million related to Digital Labor⁸ and \$0.395 million related to Mailing Operations.⁹

SCE notes above its forecast includes an adjustment related to the Employee Compensation Program proposal discussed in Exhibit SCE-06, Volume 4. No intervenor disputed the

² See Ex. SCE-03, Vol. 1, p. 26.

³ See Ex. SCE-03, Vol. 1, p. 27.

⁴ See Ex. SCE-03, Vol. 1, pp. 28-29.

⁵ See Ex. SCE-03, Vol. 1, p. 29.

⁶ See Ex. SCE-03, Vol. 1, p. 29.

⁷ See Ex. SCE-03, Vol. 1, pp. 28-29.

⁸ See Ex. SCE-03, Vol. 1, pp. 26-27

⁹ See Ex. SCE-03, Vol. 1, p. 27.

1 general structure of this proposal or the respective forecast adjustment included in this GRC Activity.¹⁰
2 To the extent the California Public Utilities Commission (Commission) adopts a forecast based on a
3 different forecast methodology than recommended by SCE (e.g., Last Year recorded, 3-Year average,
4 etc.), this Employee Compensation Program adjustment should be added back to account for the
5 incremental cost in the forecast period due to this undisputed proposal. See also SCE-17, Volume 3,
6 Chapter III for additional discussion.

7 As described in Exhibit SCE-06, Volume 3, SCE committed to updating its financial
8 forecast for incremental savings associated with SCE's Operational Excellence (OE) efforts that were
9 not yet sufficiently operationalized or matured at the time SCE submitted opening testimony.¹¹

10 Consistent with that commitment, SCE is reducing its Billing Services TY forecast by
11 \$0.755 million because of four such initiatives. The first is related to the Productivity Tracking Tool
12 discussed at Ex. SCE-03, Vol. 01, p. 27. This initiative involves implementation of a desktop analytics
13 software tool that more efficiently monitors and provides visibility to productivity of the workforce that
14 clears billing exceptions, by replacing the need for employees to manually input their work activities
15 such as start time, breaks, meetings, and end times to track their productive time.¹² The second initiative
16 modifies the exception trigger logic for certain exception types and thereby reduces the volume of
17 exceptions being worked by Billing Services. The final two initiatives are described in Section II.A.3
18 below (regarding Postage Expense), and relate to mailing operations; they will save costs on paper, ink,
19 and materials for printing bills. Due to these four initiatives, SCE is updating its TY O&M forecast to
20 \$47.394 million.

¹⁰ TURN does dispute the minor corresponding increase in forecast 401(k) costs derivate of the STIP-to-base conversion.

¹¹ See Ex. SCE-06, Vol. 3, pp. 86-97.

¹² The savings of the Productivity Tracking Tool described here are incremental to the existing savings already accounted for in SCE's initial application request.

Table II-7
Billing Services
2018-2022 Recorded/2025 Forecast
Summary o.

f SCE, Cal Advocates, and TURN Positions
(2022 Constant \$000)

Line #	Billing Services	SCE Recorded					2025 Forecast			Variance from SCE	
		2018	2019	2020	2021	2022	SCE Rebuttal Position	Cal Advocates	TURN	Cal Advocates	TURN
1	Labor	27,114	31,427	34,408	30,243	31,786	31,503	31,840		337	
2	Non-Labor	10,548	12,861	14,309	12,220	14,293	15,891	14,293		(1,598)	
3	Other	26	37	0	0	0	0	0		0	
	Total	37,688	44,325	48,717	42,463	46,079	47,394	46,133	45,925	(1,261)	(1,469)

Note: TURN did not provide a breakout by labor and non-labor.

a) Cal Advocates' Position

Cal Advocates does not contest SCE's Billing Services labor request.¹³ For non-labor, Cal Advocates recommends a reduction of \$2.017 million because: (1) SCE did not provide verifiable documentation to demonstrate its proposed increase is required;¹⁴ (2) SCE did not provide documentation to demonstrate its recorded 2022 expenses were insufficient and could not cover TY activities;¹⁵ (3) SCE's labor forecast should reduce the need for supplemental workers, which are non-labor costs;¹⁶ (4) SCE has implemented improvements in operations that should also reduce the non-labor costs;¹⁷ and (5) Cal Advocates states its proposal is consistent with the most recent spending levels in 2022 and the 2023 forecast.¹⁸

b) SCE's Rebuttal to Cal Advocates' Position

First, it is incorrect that SCE did not provide documentation demonstrating the necessity of its proposed increase and demonstrating that recorded 2022 expenses would be insufficient to cover the incremental TY activities. There are five TY adjustments that consist of upward non-labor

¹³ Ex. CA-12, p. 6.

¹⁴ See Ex. CA-12, p. 6. Cal Advocates states that SCE proposed an increase of 14.11 percent. Ex. CA-12, p. 6. However, SCE's non-labor forecast for the TY is an increase of \$2.018 million from BY recorded costs of \$14.293 million, or 14.75 percent.

¹⁵ Ex. CA-12, p. 6.

¹⁶ Ex. CA-12, p. 7.

¹⁷ Ex. CA-12, p. 7.

¹⁸ Ex. CA-12, p. 7.

1 adjustments.¹⁹ They are: (1) Operational Efficiency Measures, (2) Digital Labor, (3) Productivity
2 Tracking Initiative, (4) Customer Solutions Integration, and (5) Move-In / Move-Out (T&D). For each
3 of these adjustments, there is a detailed explanation in Ex. SCE-03, Vol. 1, pp. 24-29 for why these
4 activities are newly needed in the TY. There are also workpapers showing detailed calculations for each
5 adjustment in WP SCE-03, Vol. 1, pp. 8-17.²⁰ These workpapers were also made available to Cal
6 Advocates in electronic Excel format,²¹ allowing Cal Advocates to view the mathematical formulas used
7 to calculate and determine the specific amount of adjustment. In this way, SCE's analysis for each TY
8 adjustment demonstrates how the new TY activities require incremental funding, at the specific levels
9 requested, over 2022 recorded expenses.

10 Second, Cal Advocates offers no explanation or justification for why SCE's labor
11 forecast should reduce the need for supplemental workers. On the contrary, in Ex. SCE-03, Vol. 1,
12 pp. 24-25, SCE explains that the forecast adjustment related to operational efficiency measures reflects a
13 shifting of work from SCE's frontline employees to lower-cost supplemental workers. The strategy to
14 outsource allows SCE to reduce costs by shifting less complex work to lower-cost vendor(s) and
15 provides SCE greater flexibility to manage the peaks of billing work without hiring full-time SCE
16 resources. Cal Advocates asserts that SCE's implemented operational improvements should reduce the
17 increasing need for supplemental workers, relying on SCE's statement in testimony that "[s]ince CSR
18 implementation, SCE has gained experience in prioritizing and categorizing Billing Operations tasks,
19 enabling the cost-effective outsourcing of less complex, lower average handle time transactions to
20 supplemental workers."²² That statement actually *supports* the need for additional supplemental
21 workers, because it explains that SCE's CSR improvements are enabling SCE to shift work to lower-
22 cost supplemental workers. Although this results in a non-labor cost increase (i.e., supplemental
23 workers), there is a corresponding decrease in labor costs. The result is an overall net decrease to Billing
24 Services. Within this net decrease, Cal Advocates does not contest the reduction in labor costs
25 associated with this adjustment.²³ However, the reduction in labor can only be achieved if that work is
26 shifted to supplemental workers (i.e., non-labor).

¹⁹ Ex. SCE-03, Vol. 01, p. 24, Table II-5.

²⁰ See Appendix B, WP SCE-03, Vol. 1, pp. 8-11, 13-17; WP SCE-03, Vol. 1E4, p. 12E4.

²¹ See Appendix A, SCE's response to data request PAO-SCE-Verbal-002 (attachments omitted).

²² Ex. CA-12, p. 7 (quoting Ex. SCE-03, Vol. 1, p. 24).

²³ Ex. CA-12, p. 6.

1 For other SCE non-labor adjustments, Cal Advocates offers no explanation as to
2 why its acceptance of SCE's labor forecast should reduce non-labor costs. For instance, the Digital
3 Labor adjustment is associated with software licensing costs required to maintain automation (through
4 robotics process automation) that replace manual work.²⁴ Thus, bots enabled by the Digital Labor
5 adjustment reduce manual labor time. Furthermore, the Productivity Tracking Initiative adjustment
6 consists of the licensing fee to monitor the billing staff's productive and idle time to ensure optimal
7 performance by the billing staff.²⁵ Importantly, these non-labor investments are needed to continue to
8 realize the benefits reflected in SCE's labor forecast which Cal Advocates does not contest.²⁶ Lastly, Cal
9 Advocates' asserts that its proposal is consistent with the most recent spending levels in 2022 and the
10 2023 forecast.²⁷ It is true that Cal Advocates' recommended TY forecast of \$46.133 million is closer in
11 amount to SCE's 2022 recorded expenses of \$46.079 million and SCE's 2023 forecast of \$45.325
12 million. However, that does not make it a more valid forecast. In fact, SCE's recorded costs in 2023
13 were higher than anticipated and higher than SCE's rebuttal position, totaling \$51.271 million. SCE has
14 provided ample support and justification for every one of its TY adjustments. It has adequately
15 demonstrated the nature of incremental activities, why those incremental activities are needed, and how
16 those incremental activities translate to the exact amounts SCE is requesting. As explained above, Cal
17 Advocates does not provide any valid reason for why any of SCE's proposed non-labor activities is
18 unnecessary or unreasonable. It would not be reasonable to accept Cal Advocates' arbitrary proposed
19 reductions.

20 c) **TURN's Position**

21 TURN does not dispute any of SCE's TY adjustments and in fact applies the full
22 amount of those adjustments in its recommendation.²⁸ The only point of disagreement is that TURN
23 argues that the basis of the forecast should be a 5-year average, instead of the last year recorded of
24 2022.²⁹ TURN argues a 5-year average is more appropriate given the large fluctuations (from \$37.688

²⁴ See Ex. SCE-03, Vol. 1, pp. 26-27.

²⁵ See Ex. SCE-03, Vol. 1, p. 27.

²⁶ Ex. CA-12, p. 6.

²⁷ Ex. CA-12, p. 7.

²⁸ Ex. TURN-10, p. 5.

²⁹ See Ex. TURN-10, pp. 4-5.

1 million to \$48.717 million, which is a 29.2% difference) within the last five years.³⁰ TURN's
2 recommendation amounts to a total \$2.225 million reduction in SCE's Billing Services forecast, or a total of
3 \$45.925 million.³¹

4 **d) Rebuttal To TURN's Position**

5 TURN disagrees with SCE's statement that "labor and non-labor expenses for
6 Billing Services have been relatively stable for the last three years."³² SCE's recorded expenses for
7 Billing Services from 2018 to 2022 is shown below:

Table II-8
Historical Billing Services Costs (Constant 2022 \$000) & Variances

	2018	2019	2020	2021	2022
Total Expenses (Constant 2022 \$000)	37,688	44,325	48,717	42,463	46,079
% Variance		17.61%	9.91%	-12.84%	8.52%

8 In the last three recorded years prior to application filing (i.e., 2020, 2021, and 2022), the greatest year-
9 to-year variance observed is a 12.84% decrease, followed immediately by an 8.52% increase in the
10 subsequent year. Variances of within 10 percent are generally within operational expectations.³³ In this
11 way, looking at the last three (and even four) years as a whole, the recorded expenses have in fact stayed
12 relatively stable. Therefore, SCE's selection of the last recorded year as the Base Year (BY) is consistent
13 with Commission precedent providing that if recorded expenses have been relatively stable, or have
14 shown a trend in a certain direction, for three or more years, the last recorded year is an appropriate base
15 estimate.³⁴

16 TURN contends that "SCE also does not support why the data points for the years
17 2018, 2019, and 2021 should be ignored when 3 out of the 5 years had recorded O&M expenses lower

³⁰ Ex. TURN-10, p. 5.

³¹ Ex. TURN-10, p. 5.

³² Ex. TURN-10, p. 4 (quoting Ex. SCE-03, Vol. 1, p. 23 (footnote omitted)).

³³ See Ex. SCE-03. Vol. 01, p. 22 n. 36.

³⁴ See D.89-12-057 and D.04-07-022.

1 than the 2022 recorded.”³⁵ An averaging forecast method is generally appropriate where recorded
2 expenses have shown significant fluctuations *from year to year*, or expenses are influenced by external
3 forces beyond the utility’s control.³⁶ Here, neither circumstance is present. TURN states “a 5-year
4 average is more appropriate given the large fluctuations (from \$37.688 million to \$48.717 million,
5 which is a 29.2% difference) within the last five years.”³⁷ But the 29.2% difference is not a *year-to-year*
6 fluctuation. It is the variance between the highest and lowest points within the 5-year data. As shown
7 above, explaining the recorded expenses from a year-to-year perspective demonstrates that they have
8 been relatively stable. Nor have there been expenses influenced by external forces beyond SCE’s
9 control. As explained in SCE’s historical variance analysis for Billing Services, its labor and non-labor
10 year-to-year variances in the last five years have been within operational expectations or are attributable
11 to operational or customer-driven events.³⁸

12 Moreover, even in the event of more notable year-to-year fluctuations, those have
13 been driven by one-off events. In 2019, the 17.61 percent increase from 2020 was driven primarily by
14 increased billing exceptions resulting from the upgrade of SCE’s Meter Data Management System
15 (MDMS) completed in late 2018, and migration of approximately 1 million service accounts (SAs) from
16 bundled customers to (Community Choice Aggregator) CCA status.³⁹ In 2021, both labor and non-labor
17 expenses decreased from 2020 after the reduction of the MDMS-related billing exception backlog.⁴⁰

18 Even if an averaging method were to be adopted by the Commission, a three-year
19 or four-year average is more in line with the last recorded year of \$46.079 million and thus represents a
20 better starting point for the TY forecast.

³⁵ Ex. TURN-10, pp. 4-5.

³⁶ See D.89-12-057 and D.04-07-022.

³⁷ Ex. TURN-10, p. 5.

³⁸ See Ex. SCE-03, Vol. 1, pp. 21-22.

³⁹ See Ex. SCE-03, Vol. 1, pp. 21-22.

⁴⁰ See Ex. SCE-03, Vol. 1, pp. 21-22.

Table II-9
2022 Billing Expenses Compared to Historical Averages

	2022	2-yr avg (2021- 2022)	3-yr avg (2020- 2022)	4-yr avg (2019- 2022)	5-yr avg (2018- 2022)
Total Expenses (Constant 2022 \$000)	37,688	44,325	48,717	42,463	46,079
% Variance from 2022 to each average		-3.92%	-0.71%	-1.50%	-5.07%

1 **e) Conclusion**

2 For these reasons, SCE’s TY forecast for Billing Services O&M properly includes
3 non-labor TY adjustments (including those that are necessary to bring about labor efficiencies), and
4 reflects an appropriate BY consistent with Commission precedent. Cal Advocates’ recommendation to
5 eliminate SCE’s non-labor TY adjustments and TURN’s recommendation to use a 5-year average as the
6 BY should be rejected. SCE should be granted its full request for Billing Services of \$47.394 million.

7 **3. Postage Expense**

8 For the Postage Expense GRC Activity, the TY O&M forecast of \$14.988 million is
9 based on forecast bill, notice, and letter volumes and includes adjustments to bill volumes for customer
10 growth and electronic bill (e-bill) adoption.⁴¹

11 As described in Exhibit SCE-06, Volume 3, SCE committed to updating its financial
12 forecast for incremental savings associated with SCE’s OE efforts that were not yet sufficiently
13 operationalized or matured at the time SCE submitted opening testimony.⁴²

14 Consistent with that commitment, SCE is reducing its Postage TY forecast by \$2.372
15 million because of two such initiatives. First, in 2023, SCE took various steps to accelerate customer
16 e-bill adoption, such as by promoting the conveniences of e-billing. As a result, SCE now anticipates a
17 higher e-bill adoption rate in the TY, which would reduce postage expense for paper bills. Second, in
18 Quarter (Q)3 of 2024 SCE plans to begin implementing digital disconnection notices and digital letters

⁴¹ See Ex. SCE-03, Vol. 1, pp. 34-37.

⁴² See Ex. SCE-06, Vol. 3, pp. 86-97.

1 for customers who prefer those methods,⁴³ thereby reducing postage expense for notices and letters. In
 2 this rebuttal testimony, SCE is updating its postage TY O&M forecast to \$12.616 million to include
 3 forecast savings from these two initiatives.

Table II-10
Postage
2018-2022 Recorded/2025 Forecast
Summary of SCE, Cal Advocates, and TURN Positions
(2022 Constant \$000)

Line #	Postage	SCE Recorded					2025 Forecast			Variance from SCE	
		2018	2019	2020	2021	2022	SCE Rebuttal Position	Cal Advocates	TURN	Cal Advocates	TURN
1	Labor										
2	Non-Labor	19,235	18,064	15,702	14,527	14,248	12,616	14,988	N/A	0	N/A
3	Other										
	Total	19,235	18,064	15,702	14,527	14,248	12,616	14,988	N/A	0	N/A

4 **a) Cal Advocates' Position**

5 Cal Advocates does not contest SCE's Postage Expense request.⁴⁴

6 **b) TURN's Position**

7 TURN does not mention Postage Expense in its testimony.

8 **c) Conclusion**

9 SCE's forecast of \$12.616 million for Postage Expense is unopposed and should
 10 be adopted by the Commission.

11 **4. Credit and Payment Services**

12 The Credit and Payment Services GRC Activity's TY O&M forecast of \$12.897 million
 13 includes an increase of \$0.701 million for Return to Pre-Pandemic Disconnections and Reconnection
 14 Levels,⁴⁵ \$0.665 million for Vendor-Related Adjustments,⁴⁶ and \$0.344 million for the Employee
 15 Compensation Program⁴⁷ applicable across the company.

16 SCE notes above its forecast includes an adjustment related to the Employee
 17 Compensation Program proposal discussed in Exhibit SCE-06, Volume 4. No intervenor disputed the

⁴³ See Advice 253-G/4997-E.

⁴⁴ Ex. CA-12, p. 5.

⁴⁵ See Ex. SCE-03, Vol. 1, pp. 46-47.

⁴⁶ See Ex. SCE-03, Vol. 1, pp. 47-49.

⁴⁷ See Ex. SCE-03, Vol. 1, p. 49.

1 general structure of this proposal or the respective forecast adjustment included in this GRC Activity.⁴⁸
 2 To the extent the Commission adopts a forecast based on a different forecast methodology than
 3 recommended by SCE (e.g., Last Year recorded, 3-Year average, etc.), this Employee Compensation
 4 Program adjustment should be added back to account for the incremental cost in the forecast period due
 5 to this undisputed proposal. See also SCE-17, Volume 3, Chapter III for additional discussion.

Table II-11
Credit & Payment Services
2018-2022 Recorded/2025 Forecast
Summary of SCE, Cal Advocates, and TURN Positions
(2022 Constant \$000)

Line #	Credit & Payment Services	SCE Recorded					2025 Forecast			Variance from SCE	
		2018	2019	2020	2021	2022	SCE Rebuttal Position	Cal Advocates	TURN	Cal Advocates	TURN
1	Labor	9,456	8,021	7,513	6,513	6,169	7,848	7,848	N/A	0	N/A
2	Non-Labor	5,743	6,342	5,199	4,301	5,018	5,049	5,049	N/A	0	N/A
3	Other										
	Total	15,199	14,363	12,712	10,815	11,187	12,897	12,897	N/A	0	N/A

6 **a) Cal Advocates' Position**

7 Cal Advocates does not contest SCE's Credit and Payment Services request.⁴⁹

8 **b) TURN's Position**

9 TURN does not mention Credit and Payment Services in its testimony.

10 **c) Conclusion**

11 SCE's forecast of \$12.897 million for Credit and Payment Services is unopposed
 12 and should be adopted by the Commission.

13 **5. Uncollectible Expenses**

14 SCE forecasts a 2025 Uncollectible Expense factor of 0.191 percent based on the
 15 historical 10-year average (2013-2022), which is the methodology ordered in D.22-10-004.⁵⁰

16 **a) Cal Advocates' Position**

17 Cal Advocates does not contest SCE's proposed uncollectibles factor.⁵¹

⁴⁸ TURN does dispute the minor corresponding increase in forecast 401(k) costs derivate of the STIP-to-base conversion.

⁴⁹ Ex. CA-12, p. 5.

⁵⁰ See Ex. SCE-03, Vol. 1, p. 56.

⁵¹ Ex. CA-12, p. 2.

1 **b) TURN's Position**

2 TURN does not mention SCE's proposed uncollectibles factor.

3 **c) Conclusion**

4 SCE's proposed uncollectibles factor is unopposed, consistent with the
5 methodology ordered in D.22-10-004, and should be adopted by the Commission.

6 **B. Capital Expenditures**

7 **1. SCE Application**

8 SCE proposed two capital projects within the Billing and Payments BPE. First, the
9 Mailing Operations project includes the replacement of SCE's commercial-grade printers at its
10 headquarters in Rosemead, integration of the new printers with existing inserters and SCE's billing
11 system, retirement of SCE's mailing operations location in Irvine, and a third-party contract to print bills
12 and correspondence in the event that the Rosemead location is unable to do so due to a disaster.⁵²
13 Second, SCE plans to develop and implement new software automations, which automate processes that
14 would have otherwise required manual labor processing.⁵³

15 In rebuttal testimony, SCE is updating its Mailing Operations capital 2023 forecasted
16 costs to the recorded costs of \$5.420 million, which results in a total 2023-2025 request of \$5.545
17 million.⁵⁴ The 2023 recorded costs include \$3.745 million in hardware and maintenance costs, \$1.334
18 million in Information Technology (IT) costs, and \$0.341 million in taxes and procurement costs.⁵⁵

19 Table II-12 below shows SCE's 2023-2025 forecast for the two capital activities
20 described above as well as Cal Advocates' position. TURN did not mention capital costs for Billing and
21 Payments.

⁵² See Ex. SCE-03, Vol. 1, pp. 57-60.

⁵³ See Ex. SCE-03, Vol. 1, pp. 60-61.

⁵⁴ See Ex. SCE-18, Vol. 1, section VI.A.

⁵⁵ The \$0.125 million in SCE's 2023 forecast to enable the OE Catalyst Program was not spent by Customer Interactions in 2023, and is therefore not part of SCE's 2023 recorded Customer Interactions costs.

Table II-12
Capital Expenditures
Summary of SCE and Cal Advocates Positions
(Nominal \$000)

Line No.	Billing & Payments	SCE Rebuttal Position				Cal Advocates			Variance From SCE 2023-2025
		2023 Recorded	2024 Forecast	2025 Forecast	Total 2023-2025	2023 Forecast	2024	2025	
1	Mailing Operations	5,420	125	0	5,545	3,317	125	0	(2,103)
2	Software Automation	-	-	1,750	1,750	0	0	1,750	0
3	Total	5,420	125	1,750	7,295	3,317	125	1,750	(2,103)

2. Cal Advocates

a) Cal Advocates' Position

As shown in Table II-12 above, Cal Advocates does not oppose SCE's forecast for Software Automation.⁵⁶ Cal Advocates also does not oppose SCE's Mailing Operations forecast for 2024.⁵⁷ Cal Advocates opposes only SCE's 2023 forecast for Mailing Operations, recommending a reduction from \$5.16 million to \$3.31 million for Mailing Operations based on the following: (1) SCE failed to support the 2023 forecast; (2) Cal Advocates proposes \$3.31 million based on SCE's material supply order; and (3) ratepayer benefits will not begin until 2024.⁵⁸

b) SCE's Rebuttal to Cal Advocates' Position

As explained above, SCE is updating in this rebuttal testimony its 2023 forecast with 2023 recorded costs, which moots Cal Advocates' opposition to the 2023 forecast.⁵⁹

To be clear, however, SCE did provide sufficient support for its 2023 forecast of \$5.16 million through initial testimony⁶⁰ and a data request response wherein SCE provided vendor contracts that were the basis of its forecast.⁶¹ In arguing for a reduction to SCE's 2023 forecast, Cal

⁵⁶ Ex. CA-12, p. 12.

⁵⁷ Ex. CA-12, p. 13.

⁵⁸ Ex. CA-12, pp. 13-15.

⁵⁹ See Ex. SCE-18 Vol. 1, section VI.(A).

⁶⁰ See Ex. SCE-03, Vol. 01, pp. 58-59.

⁶¹ See SCE's response to data request PubAdv-SCE-108-MCL, Question Q2b. In its response attaching the contracts, SCE explained that "[t]he documents may not match exact costs listed in testimony and workpapers in some cases because costs during testimony development may have been estimates at the time. Also, there are some optional cost options not in testimony and workpapers. Finally, some of the purchase orders provide costs beyond what is listed for this project."

1 Advocates appears to rely on one purchase order for \$3.318 million to propose that SCE’s 2023 forecast
2 be adjusted to \$3.31 million.⁶² By doing so, Cal Advocates ignores the other 2023 purchase orders for
3 hardware costs provided in the data request response. Cal Advocates provides no explanation or
4 justification for why those other purchase orders for hardware costs, or why other non-hardware costs
5 should be excluded from SCE’s forecast. Finally, in response to Cal Advocates’ arguments that 2023
6 costs should be reduced because customer benefits will not begin until 2024, it is inaccurate that
7 customer benefits will not begin until 2024. The first wave of printers was expected to and did begin use
8 in November 2023 to print customer bills, at which point they were useful to the benefit of customers.⁶³
9 In addition, it is not atypical for capital spend to occur in a year prior to that capital equipment becoming
10 in full use.⁶⁴

11 **3. TURN**

12 **a) TURN’s Position**

13 TURN’s testimony does not mention the Software Automation or the Mailing
14 Operations capital expenses.

15 **4. Conclusion**

16 SCE’s forecast for Software Automation is unopposed. The only opposition to SCE’s
17 forecast for Mailing Operations is Cal Advocates’ opposition to SCE’s 2023 forecast, which is mooted
18 by SCE’s update of 2023 recorded amounts. SCE’s updated capital expenditures of \$7.295 million for
19 the period of 2023-2025 should be adopted by the Commission.

⁶² Cal Advocates appears to round \$3.318 million to \$3.31 million.

⁶³ SCE expects additional benefits of calculated savings included in SCE’s Billing GRC Activity beginning in 2024.

⁶⁴ Cal Advocates does not take issue with 2021 and 2022 recorded costs, which are similarly capital expenditures spent prior to the printers’ started use.

III.
CUSTOMER CONTACTS

A. O&M Expenses

1. SCE Application

The Customer Contacts BPE encompasses the Customer Contact Center (CCC) and Escalated Complaints and Outreach GRC Activities. The CCC GRC Activity is performed by SCE’s CCC organization, which interfaces with customers regarding various requests and inquiries, focusing primarily on residential customers, while also serving as the initial point of contact for small to medium non-residential customers. The Escalated Complaints and Outreach GRC Activity is performed by SCE’s Consumer Affairs organization, which handles escalated customer inquiries and complaints transferred from the Commission’s Consumer Affairs Branch (CAB) and those received directly by SCE through various channels.

The Customer Contacts BPE TY O&M forecast is \$59.343 million. The CCC GRC Activity O&M forecast is based on 2019 recorded and incremental adjustments. The Escalated Complaints and Outreach GRC Activity O&M forecast is based on 2022 recorded and incremental adjustments. Table III-13 below provides SCE’s 2025 rebuttal position forecasts for the Customer Contacts BPE’s GRC Activities of CCC and Escalated Complaints and Outreach. In addition, Table III-13 includes the 2025 forecasts for Cal Advocates and TURN along with the variance compared to SCE’s revised forecast.

Table III-13
Customer Contacts
2025 Forecast
Summary of SCE, Cal Advocates, and TURN Positions
(2022 Constant \$000)

Line No.	Customer Contacts	2025 Forecast			Variance from SCE	
		SCE Rebuttal Position	Cal Advocates	TURN	Cal Advocates	TURN
1	Customer Contact Center	52,177	49,801	49,186	(2,376)	(2,991)
2	Escalated Complaints	1,542	1,542	N/A	0	N/A
6	Total	53,719	51,343	49,186	(2,376)	(2,991)

1 **2. Customer Contact Center**

2 For the CCC GRC Activity, the TY O&M forecast of \$57.801 million includes increases
3 of \$7.833 million for frontline CCC activities,⁶⁵ \$1.281 million for CCC support activities,⁶⁶ and \$1.556
4 million for the Employee Compensation Program⁶⁷ applicable across the company, as well as reductions
5 of \$2.165 million for operational efficiencies.⁶⁸

6 SCE notes above its forecast includes an adjustment related to the Employee
7 Compensation Program proposal discussed in Exhibit SCE-06, Volume 4. No intervenor disputed the
8 general structure of this proposal.⁶⁹ To the extent the Commission adopts a forecast based on a different
9 forecast methodology than recommended by SCE (e.g., Last Year recorded, 3-Year average, etc.), this
10 Employee Compensation Program adjustment should be added back to account for the incremental cost
11 in the forecast period due to this undisputed proposal. See also SCE-17, Volume 3, Chapter III for
12 additional discussion.

13 As described in Exhibit SCE-06, Volume 3, SCE committed to updating its financial
14 forecast for incremental savings associated with SCE's OE efforts that were not yet sufficiently
15 operationalized or matured at the time SCE submitted opening testimony.⁷⁰

16 Consistent with that commitment, SCE is reducing its CCC TY forecast by \$3.491
17 million related to eight savings initiatives: (1) implement telephonic Interactive Voice Response (IVR)
18 Voice Assistant to expand self-service options for customers; (2) improve outbound text alert
19 subscription to reduce calls especially for outage status, credit, and questions about high bills; (3) auto-
20 enroll outage preferences and paperless billing during move-in on SCE.com to minimize customer
21 callback; (4) provide on-demand customer education resources via YouTube about important issues
22 customers call about (i.e. Power Safety Power Shutoff, Time-Of-Use (TOU) default) to reduce calls; (5)
23 provide Energy Advisors (ENAs) greater visibility about NEM interconnection/billing status and
24 provide access to tools for NEM billing related calls and inquiries, reduces Average Handle Time

⁶⁵ See Ex. SCE-03, Vol. 1, pp. 79-83.

⁶⁶ See Ex. SCE-03, Vol. 1, pp. 83-85.

⁶⁷ See Ex. SCE-03, Vol. 1, p. 87.

⁶⁸ See Ex. SCE-03, Vol. 1, pp. 86-87.

⁶⁹ TURN does dispute the minor corresponding increase in forecast 401(k) costs derivate of the STIP-to-base conversion.

⁷⁰ See Ex. SCE-06, Vol. 3, pp. 86-97.

(AHT); (6) send proactive communications to customer to eliminate calls (i.e. on high bills, NEM); (7) implement commercial move-in/move-out on SCE.com and make design and navigation improvements to My Account landing page; and (8) add chat box on SCE.com to answer Frequently Asked Questions (FAQs) to reduce customer calls.

SCE’s rebuttal position also includes a partial reduction of its TY adjustment for NEM, CCA, and Credit Outbound Calls. Specifically, SCE is removing the portion of the adjustment for credit outbound calls. Cal Advocates recommends a 50 percent reduction of SCE’s adjustment.⁷¹ TURN makes two arguments in support of rejecting the entirety of SCE’s TY adjustment for credit calls: (1) it is not part of compliance, and (2) SCE’s forecast is greatly exaggerated.⁷² First, TURN is correct that D.20-06-003 did not require utilities to make outbound calls to offer applicable benefit programs to eligible residential customers prior to disconnection, and that it required utilities to offer programs for inbound calls only. SCE makes program offerings on inbound calls. However, as explained in initial testimony, SCE makes outbound calls as well as a safeguard for customers who did not receive program offerings on a prior inbound call and who face imminent disconnection for nonpayment.⁷³ Further, SCE’s forecast was based on up-to-date data the time it was developed, prior to the filing of this application. TURN points to newly available data since the time of filing to argue that SCE’s forecast is grossly exaggerated.⁷⁴ In any event, SCE modifies its rebuttal request to include a reduction of \$2.133 million in labor costs attributed to the outbound credit call activity.

Table III-14
Customer Contact Center
2018-2022 Recorded/2025 Forecast
Summary of SCE, Cal Advocates, and TURN Position
(2022 Constant \$000)

Line #	Customer Contact Center	SCE Recorded					2025 Forecast			Variance from SCE	
		2018	2019	2020	2021	2022	SCE Rebuttal Position	Cal Advocates	TURN	Cal Advocates	TURN
1	Labor	33,357	31,165	31,194	34,166	28,569	36,305				
2	Non-Labor	20,182	18,132	15,999	22,831	14,405	15,873				
3	Other										
	Total	53,539	49,296	47,194	56,996	42,974	52,177	49,801	49,186	(2,376)	(2,991)

Note: Cal Advocates and TURN did not provide a breakout of labor and non-labor.

⁷¹ Ex. CA-12, p. 11.

⁷² Ex. TURN-10, pp. 7-8.

⁷³ See Ex. SCE-03, Vol. 01, pp. 81-82.

⁷⁴ See Ex. TURN-10, pp. 7-8.

1 **a) Cal Advocates' Position**

2 Cal Advocates recommends a total reduction of \$8.000 million from SCE's
3 forecast, which consists of two parts. First, Cal Advocates recommends SCE's forecast use a BY of
4 2022 instead of 2019, the result of which is a \$6.322 million reduction (\$2.596 million labor, \$3.727
5 million non-labor).⁷⁵ Cal Advocates contends that SCE's forecast based on 2019 is not justified and the
6 BY in a GRC is always the last recorded year.⁷⁶ Cal Advocates also asserts that SCE's 2022 recorded
7 expenses and 2023 forecast more accurately reflect recent and expected activities compared to 2019.⁷⁷
8 Cal Advocates also recommends a reduction in labor of \$1.678 million, i.e., half of SCE's TY
9 adjustment for NEM, CCA, and Credit Outbound Calls.⁷⁸ Cal Advocates argues that the call adjustment
10 is excessive, citing (1) a decrease in SCE's NEM installation forecast after 2025, and (2) the uncertainty
11 of the NEM Program, which is under review due to D.22-12-056.⁷⁹ Although the adjustment is for
12 NEM, CCA, and Credit Outbound Calls and Cal Advocates recommends deducting half of the *entire*
13 adjustment,⁸⁰ Cal Advocates does not specifically contest SCE's forecast of CCA or credit outbound
14 calls, and provides no information as to why those would be overestimated. Cal Advocates does not
15 oppose any other TY adjustment.

16 **b) SCE's Rebuttal to Cal Advocates' Position**

17 **(1) The Most Appropriate BY for SCE's CCC Forecast is 2019**

18 Cal Advocates is incorrect that "[t]he BY in a GRC is always established
19 as the last recorded year."⁸¹ In fact, TURN recommends a 5-year average BY.⁸² Occasionally, the last
20 recorded year is referred to as the "base year." But the last recorded year does not have to be the BY

⁷⁵ Using 2022 as the BY, Cal Advocates contends the starting point for the TY year labor forecast should be the 2022 recorded labor amount of \$28.569. Cal Advocates thus argues that SCE's TY labor forecast of \$39.423 million represents a \$10.85 million increase, but that SCE has only provided TY adjustments totaling \$8.258 million for labor. Cal Advocates thereby claims that SCE has not provided documentation supporting the difference of \$2.596 million. *See* Ex. CA-12, p. 9.

⁷⁶ Ex. CA-12, p. 9.

⁷⁷ Ex. CA-12, p. 9.

⁷⁸ Ex. CA-12, p. 10.

⁷⁹ Ex. CA-12, pp. 10-11.

⁸⁰ Ex. CA-12, pp. 10-11.

⁸¹ Ex. CA-12, p. 9.

⁸² Ex. TURN-10, pp. 5-6.

1 used for forecasting purposes. Here, SCE uses 2019 as the “base year” in the sense that SCE used 2019
2 recorded amounts as the basis, or starting point, for its forecast. SCE then made upward and downward
3 adjustments to that starting point to arrive at its TY forecast. The Commission has provided that “there
4 are a number of acceptable methodologies for forecasting test year costs. In this GRC, parties have used
5 averages and trends of recorded costs, the most recent recorded costs, as well as forecasts based on
6 budgets or incremental budgets over recorded amounts.”⁸³ In addition, the Commission has noted that
7 “in using budget based methodologies, the forecasts are often based on incremental budgets over a base
8 amount, *usually* the last recorded year.”⁸⁴ But there is no requirement that the BY *must* be the last
9 recorded year.

10 Cal Advocates recommends 2022 as the BY based on its assertion that
11 SCE’s 2022 recorded expenses and 2023 forecast more accurately reflect recent and expected activities
12 compared to 2019.⁸⁵ SCE agrees with the underlying implication that the BY should be the year that
13 most accurately reflects expected TY activities. Here, however, that year is 2019. As SCE explained in
14 testimony:⁸⁶

15 The years 2020 to 2022 were atypical years for CCC operations because of the
16 disconnection moratorium resulting from the COVID-19 pandemic, whereby SCE
17 suspended all disconnections for nonpayment. . . . Because SCE stopped collections
18 activities during the moratorium (i.e., stopped attempts to collect on past due amounts),
19 there were significantly fewer customer calls regarding payment of past due amounts and
20 avoiding disconnections for nonpayment (i.e., credit calls).”

21 These impacts are not trivial or immaterial. As shown in SCE’s initial testimony, credit calls decreased
22 by 49 percent from 2019 to 2022.⁸⁷ Beyond credit calls, there were other CCC impacts during the
23 COVID-19 pandemic. Because of pandemic-related customer protections that temporarily suspended
24 CARE verification of usage and income, CARE calls also were reduced as a result of the pandemic.⁸⁸

⁸³ D.06-05-016, p. 10 (footnote omitted).

⁸⁴ D.06-05-016, p. 11 (emphasis added).

⁸⁵ Ex. CA-12, p. 9.

⁸⁶ Ex. SCE-03, Vol. 1, p. 77.

⁸⁷ See Ex. SCE-03, Vol. 1, p. 70, Figure III-18 (showing a reduction from 11.6 million credit calls in 2019 to 5.9 million credit calls in 2022, equaling a difference of 5.7 million credit calls). 5.7 million is 49 percent of 11.6 million.

⁸⁸ See Ex. SCE-03, Vol. 1, p. 77.

1 This call type decreased by 43 percent from 2019 to 2022. In addition, during the disconnection
2 moratorium, customers did not face disconnection despite not paying their bills and SCE received fewer
3 billing inquiries. SCE experienced a 59 percent reduction for this call type from 2019 to 2022. These
4 impacts are not expected to carry through in the TY, by which time the CCC expects a return to pre-
5 pandemic levels of operations. Because the TY is a non-COVID year, the BY should be too. Here, the
6 last recorded year most reflective of an operations baseline free from pandemic impacts is 2019.

7 If SCE had used 2022 as the BY, there would need to be additional
8 upward TY adjustments to account for the increase in operations from 2022 to 2025 due to returning to
9 pre-pandemic operations. SCE did not need such upward adjustments because SCE selected 2019 as the
10 BY. In other words, if one uses a BY that includes an anomaly making it non-representative of TY
11 activities, one would need to adjust out the effects of that anomaly. Indeed, in another GRC Activity
12 impacted by the COVID-19 pandemic where SCE used 2022 as a BY, SCE included an adjustment in its
13 TY forecast for return to pre-pandemic levels.⁸⁹ In its initial application, SCE did not take this approach
14 for its CCC forecast, because as explained above, the pandemic had far-reaching impacts that permeated
15 several aspects of CCC operations in 2020 to 2022. Given the severity and complexity of these impacts,
16 attempting to forecast a “return to pre-pandemic” TY adjustment for the CCC would have required
17 various assumptions and estimates. SCE chose to avoid these uncertainties by instead using a “normal”
18 BY that is indicative of 2025 operations. In this way, SCE believes using the 2019 BY yields a
19 reasonable forecast. However, if the Commission is inclined to require that SCE’s forecast use 2022
20 instead of 2019 as the BY, then it must also authorize an upward adjustment to account for the return of
21 pre-pandemic operations (e.g., the difference between SCE’s 2019 and 2022 recorded costs). With such
22 adjustments to account for shifting to a 2022 BY, SCE’s TY forecast would theoretically end up in
23 relatively the same place, regardless of whether a 2019 or 2022 BY is used.

24 **(2) SCE Did Not Over-Forecast NEM, CCA, and Credit Outbound Calls**

25 As an initial matter, SCE’s TY Adjustment for Increased NEM, CCA, and
26 Credit Outbound Call Activities comprises of three parts: NEM calls, CCA calls, and Credit Outbound
27 calls. Cal Advocates summarily recommends reducing half of the *entire* adjustment,⁹⁰ but offers no

⁸⁹ Credit and Payment Services is the other GRC activity in Ex. SCE-03, Vol. 01 that observed significant impacts during pandemic years due to the disconnection moratorium. Notably, Cal Advocates did not contest SCE’s Credit and Payment Services forecast, which included a TY adjustment for return to pre-pandemic disconnection and reconnection levels.

⁹⁰ Ex. CA-12, p. 10.

1 specific assertion that SCE over forecasts CCA or outbound credit call activities, much less any
2 explanation or justification for why these two subparts should be adjusted downward. For this reason
3 alone, the Commission should reject Cal Advocates' recommendation to reduce amounts associated with
4 forecasted CCA and outbound credit call activities.

5 Regarding NEM calls, Cal Advocates asserts that (1) SCE's anticipated
6 increase in NEM installations and participating is unsupported based on information contained in SCE's
7 testimony, because SCE's NEM installation forecast shows a decrease after year 2025,⁹¹ and (2) the
8 NEM program is under review due to D.22-12-056 and the outcome of the NEM Program is uncertain.⁹²
9 To be clear, SCE's testimony does not show the total number of NEM installations decreasing. It is true
10 that *incremental* installations decrease after 2025;⁹³ however, the *total* number of NEM customers
11 continues to increase throughout the GRC period.⁹⁴ The increase in NEM customers means increasing
12 NEM calls; NEM customers call SCE for information about program enrollment and rules.⁹⁵ They also
13 ask about their more complicated bills and system performance.

14 Moreover, even if there are fewer new, incremental NEM installations,
15 that does not mean CCC NEM call activity will not increase. A single new NEM installation can result
16 in multiple CCC interactions. And even without a new NEM installation, the CCC could still receive
17 increasing NEM calls as customers move into properties with existing solar, or customers pursue
18 enhancements of existing solar.

19 In addition, setting aside the number of NEM calls the CCC expects to
20 receive, NEM calls are expected to grow in complexity, creating longer handle times. SCE's workpaper
21 shows that an average NEM-related call is forecasted to increase from 380 seconds in 2019 to 703
22 seconds in 2025.⁹⁶ Typically, NEM calls are longer because they involve agents educating the customer
23 on their solar equipment, generation charges, bill calculations, and, most often, their annual settlement
24 bills, which can be costly and not in line with customers' expectations or understanding. NEM calls have
25 continued to grow in complexity and handling time since 2019. Beginning in 2021, existing NEM

⁹¹ Ex. CA-12, pp. 10-11.

⁹² Ex. CA-12, p. 11.

⁹³ See Ex. SCE-07, Vol. 1, p. 96.

⁹⁴ See Appendix B, WP SCE-03, Vol. 1E4, p. 12E4.

⁹⁵ See Ex. SCE-03, Vol. 1, p. 80.

⁹⁶ See Appendix B, WP SCE-03, Vol. 1, p. 67.

1 customers that transitioned from discontinued rates and new NEM customers selecting a TOU rate
2 required additional customer education regarding generation credits and/or the TOU rate. Particularly as
3 relevant technologies have become more widespread since 2019, there has been additional complexity
4 for customers who call seeking to understand how paired storage and generation caps billing work, both
5 before purchase decisions and again after billing commences. Further, NEM call volumes are forecasted
6 to continue this upward trajectory due to the complexity of educating customers about the Net Billing
7 Tariff (i.e., the successor to NEM 2.0 tariff), including the difference in calculations in comparison to
8 NEM 1.0 and 2.0. Lastly, Cal Advocates seems to suggest that NEM call activity is somehow uncertain
9 because “the NEM Program is under review and direction by the Commission due to D.22-12-056
10 policy.”⁹⁷ D.22-12-056 replaces the NEM 2.0 tariff while adopting a successor to the NEM 2.0 tariff
11 (referred to as the Net Billing Tariff).⁹⁸ Moreover, D.22-12-056’s authorizing an evaluation of the
12 NBT⁹⁹ does not signal potential elimination of NBT, but rather potential future improvements and
13 program changes. In this way, D.22-12-056 adds additional complexity to the NEM regulatory space,
14 which will likely increase pressures on the CCC, not decrease them.

15 **c) TURN’s Position**

16 TURN’s recommended reduction of \$8.615 million comprises of (1) a reduction
17 of \$3.704 million due to its recommendation that SCE’s forecast use a five-year average (excluding
18 CSR costs) as the basis,¹⁰⁰ (2) rejection of SCE’s TY adjustment of 3.355 million for increased NEM,
19 CCA, and Credit Outbound calls,¹⁰¹ and (3) rejection of SCE’s TY adjustment of \$1.556 million for
20 changes made to SCE’s employee compensation program.¹⁰² In addition, TURN is not opposed to SCE’s
21 TY adjustment for increased ENA salaries on the condition that if SCE does not implement the wage
22 increases as proposed, the difference between authorized and recorded be credited back to ratepayers.¹⁰³

⁹⁷ Ex. CA-12, p. 11.

⁹⁸ See D.22-12-056, OP 1.

⁹⁹ See D.22-12-056, OP 7.

¹⁰⁰ See Ex. TURN-10, pp. 5-6.

¹⁰¹ See Ex. TURN-10, pp. 6-8.

¹⁰² See Ex. TURN-10, p. 9.

¹⁰³ See Ex. TURN-10, pp. 8-9.

1 First, TURN rejects SCE’s use of 2019 as a BY.¹⁰⁴ It contends that the
2 Commission should reject SCE’s reliance on the COVID-19 pandemic to justify a 2019 BY because
3 during COVID-19 years, SCE benefited from reduced O&M costs through shareholder earnings.¹⁰⁵
4 TURN argues a five-year average should be the starting point instead.¹⁰⁶ TURN also argues one-time
5 CSRP costs should be excluded when calculating a 5-year average.¹⁰⁷

6 Second, TURN rejects SCE’s TY adjustment for increased call activities, arguing:
7 (1) SCE’s forecast of NEM installations contradicts its claim of increasing NEM customers that drive
8 NEM call volumes;¹⁰⁸ (2) SCE fails to support an increase of CCA calls;¹⁰⁹ and (3) even if the outbound
9 calls are part of compliance, the SCE’s forecast of call volumes is greatly exaggerated.¹¹⁰

10 Third, TURN rejects the CCC adjustment for changes to the employee
11 compensation program because TURN purports that this increase is not needed on top of the TY
12 adjustment for ENA salary increases, which it does not oppose so long as it is conditioned on actual
13 implementation.¹¹¹

14 **d) Rebuttal to TURN’s Position**

15 **(1) The Most Appropriate BY for SCE’s CCC Forecast is 2019**

16 TURN’s argument that the COVID-19 pandemic does not justify use of
17 2019 as a BY is misplaced. The fact that the CCC recorded less than what it was authorized does not
18 mean that SCE “pocketed” the reduced O&M costs as earnings for shareholders. Long-established
19 Commission precedent makes clear that GRC O&M authorized funding can and should be reprioritized
20 to fund other company activities unless they are required to be tracked separately in a regulatory account
21 and used for a specific purpose. SCE uses 2019 as the BY because that is the last recorded year most
22 reflective of pre-pandemic levels of operations, which is what SCE expects in the 2025 TY.¹¹²

¹⁰⁴ See Ex. TURN-10, p. 5.

¹⁰⁵ Ex. TURN-10, p. 5.

¹⁰⁶ Ex. TURN-10, pp. 5-6.

¹⁰⁷ Ex. TURN-10, p. 6.

¹⁰⁸ Ex. TURN-10, pp. 6-7.

¹⁰⁹ Ex. TURN-10, p. 7.

¹¹⁰ Ex. TURN-10, pp. 7-8.

¹¹¹ See Ex. TURN-10, p. 9.

¹¹² See Ex. SCE-03, Vol. 1, pp. 77-79.

1 TURN argues that a more appropriate forecast basis is a 5-year average
2 due to the varying nature of recorded CCC O&M.¹¹³ However, even assuming that a five-year average is
3 the appropriate starting point, TURN's calculation of the five-year average is problematic.
4 TURN removes CSRP costs before calculating the average, arguing that it was inappropriate for SCE to
5 include because they are one-time costs.¹¹⁴ If one-time events that cause cost *increases* need to be
6 excluded from the five-year average, so too should one-time events that cause cost *decreases*, like the
7 COVID-19 pandemic. It is inconsistent for TURN to exclude CSRP issues from the basis on grounds
8 that they are one-time and not traditional cost *increases*, yet include the effects of something as "one
9 time" and "not traditional" as a global pandemic in the basis when those effects are cost *decreases*.
10 In TURN's own words, TURN is the one who "cannot have it both ways."¹¹⁵ Moreover, if SCE used a
11 five-year average as the BY, without removing CSRP costs, SCE would have started at \$50.000 million,
12 which is only 1.4 percent difference from the 2019 value that SCE used as the BY.¹¹⁶ Lastly, 2019 did
13 not have one-time CSRP costs, so by SCE using 2019 as a BY, CSRP costs are a non-issue.

14 **(2) SCE Did Not Over-Forecast NEM, CCA, And Credit Outbound Calls**

15 NEM Calls. Refer to SCE's rebuttal to Cal Advocates' position above at
16 section III.A.2.b)(2) regarding why SCE forecasts an increase of NEM call activities even though
17 incremental NEM installations will not continue to grow in the GRC period.

18 CCA Calls. TURN contends SCE does not explain why it is appropriate to
19 use 2019 call volumes as a basis when it had nearly half as many CCA customers in 2019 compared to
20 2022 and when it is using 2022 recorded O&M expenses as a starting point for its forecast.¹¹⁷ It is
21 unclear why TURN asserts SCE is using 2022 recorded O&M expenses as a starting point for its
22 forecast. As SCE explained in initial testimony, for this activity, SCE is using 2019 as the BY.¹¹⁸
23 Accordingly, for all of its TY forecast adjustments, SCE determines and requests the amount of funding

¹¹³ Ex. TURN-10, pp. 5-6.

¹¹⁴ Ex. TURN-10, p. 6.

¹¹⁵ Ex. TURN-10, p. 5.

¹¹⁶ Further, even if one excludes CSRP costs from the five-year average as TURN recommends, TURN's calculation of CSRP costs to exclude is incorrect. TURN double counts 2020 CSRP costs of \$3.657 million (\$1.167 million in labor and \$2.490 million in non-labor) by subtracting this value from both 2020 and 2021 and thus over-excludes \$3.657 million. *See* Ex. TURN-10, p. 6.

¹¹⁷ Ex. TURN-10, p. 7.

¹¹⁸ *See* Ex. SCE-03, Vol. 1, pp. 77-79.

1 for TY activities that is incremental to 2019. TURN focuses on the relative lack of increase in CCA
2 customers from 2022 to 2025;¹¹⁹ however, SCE’s TY adjustment is for CCA calls in 2025 that are
3 *incremental to 2019*.

4 TURN also questions the call increase in light of the fact that SCE does
5 not expect to have new CCAs by 2025 and when no CCAs were added in 2023, CCA calls dropped by
6 56.4 percent compared to 2022.¹²⁰ SCE forecasted the 2025 CCA call volume by using the 2025 forecast
7 number of CCA customers, and then applying a customer-to-call ratio of 3 percent. SCE used three
8 percent because that is the average observed customer-to-call ratio in years 2019 and 2020.
9 SCE specifically used 2019 and 2020 and omitted years 2021 and 2022 from its average because of
10 mass enrollments and reversions in those later years that increased the number of calls per CCA
11 customer; including call ratios from these years would yield a 5 percent customer-to-call ratio. In this
12 way, SCE’s forecast is conservative and avoids the impact of any temporary spike in call volume due to
13 new CCAs. Moreover, the lack of new CCAs does not necessarily correspond with stagnant or declining
14 numbers of CCA calls. As stated above, the drop in call volumes from 2022 to 2023 shows a return to
15 normalcy in comparison from the one-time anomalies in 2022.

16 Finally, TURN exclusively discusses the number of CCA calls, but
17 ignores another key driver of CCA call activity, which is the duration of CCA calls. In other words, even
18 if the number of CCA calls decline (to be clear, SCE does not forecast they will), longer CCA calls
19 would still result in increased CCA call activity that will necessitate increased funding. As shown in WP
20 SCE-03. Vol. 1, p. 67,¹²¹ SCE forecasts that CCA call handle times will increase by approximately 24
21 percent (from 398 seconds in 2019 to 506 seconds in the TY). As explained in direct testimony, “CCA
22 calls are increasingly complicated by the interaction of CCA service and CCA billing components with
23 other customer rates or services, such as NEM or customer-paired storage.”¹²²

¹¹⁹ See Ex. TURN-10, p. 7.

¹²⁰ Ex. TURN-10, p. 7.

¹²¹ See Appendix B, WP SCE-03, Vol. 1, p. 67.

¹²² Ex. SCE-03, Vol. 1, p. 81.

1 (3) **SCE Appreciates TURN’s Non-Opposition of Its Wage Increase**
2 **Adjustment, but the Employee Compensation Adjustment Is Still**
3 **Needed.**

4 TURN is not opposed to ENA salary increases so long as SCE implements
5 them: TURN argues the Commission should grant this adjustment *only if* any amounts due to non-
6 implementation be credited back to customers.¹²³ SCE fully intends to implement these salary increases.
7 In fact, as explained in testimony¹²⁴ and a data request response,¹²⁵ SCE has already started increasing
8 ENA wages by an average weighted 8.4 percent in 2023, with plans to provide additional cycles of
9 increases in 2024 (average weighted 9.4 percent) and 2025 (average weighted 8.6 percent).
10 SCE provides additional specificity here that it plans to implement the 2024 wage increase by the end of
11 Q2 of 2024, and the 2025 increase in Q1 or Q2 of 2025. SCE has every intention of implementing these
12 salary increases. However, it would be improper for the Commission to require a credit back to
13 customers if GRC O&M authorized funding is ultimately used for a different purpose than what is
14 forecast. As explained above, long-established Commission precedent makes clear that GRC O&M
15 authorized funding can and should be reprioritized to fund other company activities unless they are
16 required to be tracked separately in a regulatory account and used for a specific purpose.

17 TURN argues that if the wage increase adjustment will already bring ENA
18 salaries to the market average, there is no need for the further increase requested via the Employee
19 Compensation Program Adjustment.¹²⁶ TURN’s testimony appears to misunderstand the correlation
20 between these two adjustments. The employee compensation program adjustment is needed on top of
21 increased ENA wages not to further increase ENA salaries, but to shift amounts from incentive
22 compensation to base pay for the CCC generally. This shift is needed, separate from the ENA wage
23 increase adjustment, for reasons discussed in Ex. SCE-06, Vol. 4, pp. 45-48. This is across the enterprise
24 and is no way isolated to ENA positions. SCE’s corresponding rebuttal testimony is in Ex. SCE-17, Vol.
25 3, Section III.A.5. TURN’s testimony was silent on SCE’s proposal in SCE-06, Vol. 4 to move STIP

¹²³ See Ex. TURN-10, pp. 8-9.

¹²⁴ See Ex. SCE-03, Vol. 1, p. 83.

¹²⁵ See Appendix A, SCE’s response to data request TURN-SCE-095, Question 6.

¹²⁶ See Ex. TURN-10, p. 9.

1 target to base pay.¹²⁷ Further, SCE's total compensation study, summarized in Ex. SCE-06, Vol. 4 and
2 located in Ex. SCE-05, Vol. 5, provides key documentation supporting SCE's employee compensation
3 program, including the significant under market position for the ENA positions.

4 **e) Conclusion**

5 Contrary to arguments by Cal Advocates and TURN, 2019 is an appropriate BY
6 given the significant impacts of the COVID-19 pandemic on CCC activities. In addition, SCE's forecast
7 for increased NEM call activity properly accounts for increasing *cumulative* NEM installations as well
8 as the varied impacts of NEM installations on CCC activities. SCE also appropriately forecasted
9 increased CCA call activities. SCE's forecast of \$ \$52.177 million for the CCC should be adopted by the
10 Commission.

11 **3. Escalated Complaints and Outreach**

12 For the Escalated Complaints and Outreach GRC Activity, the TY O&M forecast of
13 \$1.542 million includes increases of \$0.272 million for Increased Consumer Affairs Support¹²⁸ and
14 \$0.071 million for the Employee Compensation Program¹²⁹ applicable across the company.

15 SCE notes above its forecast includes an adjustment related to the Employee
16 Compensation Program proposal discussed in Exhibit SCE-06, Volume 4. No intervenor disputed the
17 general structure of this proposal or the respective forecast adjustment included in this GRC Activity.¹³⁰
18 To the extent the Commission adopts a forecast based on a different forecast methodology than
19 recommended by SCE (e.g., Last Year recorded, 3-Year average, etc.), this Employee Compensation
20 Program adjustment should be added back to account for the incremental cost in the forecast period due
21 to this undisputed proposal. See also SCE-17, Volume 3, Chapter III for additional discussion.

¹²⁷ TURN does dispute the minor corresponding increase in forecast 401(k) costs derivate of the STIP-to-base conversion.

¹²⁸ See Ex. SCE-03, Vol. 1, p. 93.

¹²⁹ See Ex. SCE-03, Vol. 1, p. 94.

¹³⁰ TURN does dispute the minor corresponding increase in forecast 401(k) costs derivate of the STIP-to-base conversion.

Table III-15
Escalated Complaints
2018-2022 Recorded/2025 Forecast
Summary of SCE, Cal Advocates, and TURN Positions
(2022 Constant \$000)

Line #	Escalated Complaints	SCE Recorded					2025 Forecast			Variance from SCE	
		2018	2019	2020	2021	2022	SCE Rebuttal Position	Cal Advocates	TURN	Cal Advocates	TURN
1	Labor	1,248	1,194	1,248	1,398	1,172	1,490	1,490	N/A	0	N/A
2	Non-Labor	44	85	40	28	27	52	52	N/A	0	N/A
3	Other										
	Total	1,293	1,278	1,288	1,426	1,198	1,542	1,542	N/A	0	N/A

1 **a) Cal Advocates' Position**

2 Cal Advocates does not contest SCE's request for Escalated Complaints and
3 Outreach.¹³¹

4 **b) TURN's Position**

5 TURN does not mention Escalated Complaints and Outreach in its testimony.

6 **c) Conclusion**

7 SCE's forecast of \$1.542 million for Escalated Complaints and Outreach is
8 unopposed and should be adopted by the Commission.

¹³¹ Ex. CA-12, p. 5.

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IV.

CUSTOMER SERVICE RE-PLATFORM

A. **Expenses**

Table IV-16 below provides the O&M and capital 2022 recorded and 2023-2024 forecasted costs SCE proposed in its GRC application. The table also shows the 2023 recorded costs.

*Table IV-16
Customer Service Re-Platform
Summary of SCE Position
(Nominal \$000)*

Cost Type/Cost Category	SCE Application Filing			Recorded 2023
	Recorded 2022	Forecasts		
	2022	2023	2024	2023
Capital Expenditures				
Technology Enhancements	\$ 8.17	\$ 8.35	\$ 5.00	\$ 4.34
Customer Solutions Integration	\$ 3.73	\$ 2.42	\$ 1.72	\$ 0.90
Total Capital Expenditures	\$ 11.90	\$ 10.78	\$ 6.72	\$ 5.24
O&M Expenses				
Technology Enhancements	\$ 6.28	\$ 1.00	\$ 0.50	\$ 2.42
Customer Solutions Integration	\$ 5.78	\$ 5.02	\$ 4.11	\$ 2.52
Staff Augmentation	\$ 10.52	\$ 3.80	\$ -	\$ 3.42
Total O&M Expenses	\$ 22.57	\$ 9.82	\$ 4.61	\$ 8.36
Total Costs	\$ 34.47	\$ 20.59	\$ 11.34	\$ 13.60

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1. **SCE Application**

The Customer Service Re-Platform (CSRP) project replaced the majority of SCE's outdated Customer Service technology portfolio with a new enterprise customer relationship and billing system that performs core customer-service related functions such as generating customer bills, enabling customer account management, and providing customers access to SCE rates and programs. In this proceeding, SCE is seeking recovery of 2022-2024 recorded costs in the Customer Service Re-Platform Memorandum Account (CSRPMA). SCE proposes to update the record in this proceeding to reflect the most recent CSRPMA recorded activity during the update phase. Upon a final Commission decision in this proceeding, SCE proposes to transfer the December 31, 2024 recorded CSRPMA balance associated with the 2022-2024 post-implementation CSRP costs and benefits to the distribution subaccount of the Base Revenue Requirement Balancing Account (BRRBA-D) for recovery in distribution rates from all

1 customers. Because SCE is not putting a forecast of these costs into rates, only the actual recorded costs
2 as of December 31, 2024 will be recovered from customers.

3 With respect to the variance between 2023 forecast and recorded costs shown above, the
4 2023 recorded capital costs ended up less than the forecast because one of the technology enhancement
5 projects moved from capital to O&M and SCE had fewer projects come through in 2023, which means
6 there will be more projects in 2024. Further, the variance between 2023 forecast and recorded O&M
7 costs is due to resource reductions for CSI labor.

8 **2. Cal Advocates**

9 **a) Cal Advocates' Position**

10 Cal Advocates does not oppose the recovery of recorded costs through December
11 31, 2022, but opposes any recovery of SCE's forecast of 2023 and 2024 costs since these are estimates
12 yet to be incurred and recorded in the memorandum account.¹³² Cal Advocates contends that SCE can
13 request recovery of the actual recorded 2023 and 2024 memorandum account costs for recovery in its
14 next GRC proceeding or other appropriate application.¹³³

15 **3. TURN**

16 **a) TURN's Position**

17 TURN did not mention CSRP 2022-2024 costs in their testimony.

18 **4. Conclusion**

19 The CSRP recorded and forecast costs were not opposed by intervenors on their merits.
20 Rather, Cal Advocates proposes that SCE should only recover 2022 recorded costs in this proceeding
21 and should wait until its next GRC proceeding or other appropriate application to recover 2023 and 2024
22 recorded costs. SCE's rebuttal to this cost recovery proposal is discussed at Ex. SCE-18, Volume 1
23 (Witness Pulgar).

¹³² CA-29 (Chia), p. 14.

¹³³ CA-29 (Chia), p. 14.

V.

OTHER OPERATING REVENUES

A. SCE Application

Service fees are charges to individual customers and third parties who receive services that cause SCE to incur additional operational expenses. These services are above the standard operational services provided by SCE. As such, consistent with Commission-approved tariffs, SCE cannot fund these activities through general rates and must charge separately for these services. The revenue received for these services is accounted for as OOR.

Based upon SCE’s proposed service fees for 2025, SCE’s forecast revenue in the initial application filing was \$29.107 million; however, due to errata corrections, the updated 2025 forecast revenue is \$28.582 million. Table V-17 shows SCE’s forecast alongside the recommendations of Cal Advocates, CalCCA, and SCE’s rebuttal position.¹³⁴

***Table V-17
Other Operating Revenue (OOR) Fees
2018-2022 Recorded/2025 Forecast
Summary of SCE, Cal Advocates, and CalCCA Positions
(Nominal \$000)***

Line No.	Activity	SCE Recorded					2025 Forecast			Variance from SCE		SCE Rebuttal Position
		2018	2019	2020	2021	2022	SCE	Cal Advocates	CalCCA	Cal Advocates	CalCCA	
1	Paper Bill Fee - Residential	N/A	N/A	N/A	N/A	N/A	7,553	0	N/A	(7,553)	N/A	7,553
2	Late Payment Charge - Residential	11,586	10,435	2,856	3,295	9,814	7,374	7,374	N/A	0	N/A	7,374
3	Connection Charge - Residential	5,807	5,612	4,054	2,906	3,443	-	-	N/A	-	N/A	-
4	Opt-Out CARE - Initial	2	2	2	0	0	0	0	N/A	0	N/A	0
5	Opt-Out NON-CARE - Initial	53	47	37	6	1	1	1	N/A	0	N/A	1
6	Opt-Out CARE - Monthly	30	32	36	29	14	14	14	N/A	0	N/A	14
7	Opt-Out NON-CARE - Monthly	193	188	198	138	102	264	264	N/A	0	N/A	264
8	Paper Bill Fee - Non-Residential	N/A	N/A	N/A	N/A	N/A	1,864	0	N/A	(1,864)	N/A	1,864
9	Late Payment Charge - Non-Residential	6,160	5,566	3,191	5,490	7,350	3,933	3,933	N/A	0	N/A	3,933
10	Connection Charge - Non-Residential	2,166	2,115	1,833	1,506	1,945	-	-	N/A	-	N/A	-
11	Returned Check Charge	1,600	1,560	1,213	1,002	1,209	1,195	1,195	N/A	0	N/A	1,195
12	Connection Charge - At Pole	22	24	14	2	2	31	31	N/A	0	N/A	31
13	Optimal Billing Period	0	0	0	-	-	8	8	N/A	0	N/A	8
14	Misc. Revenue - Recovery Unauthorized Use Non-Energy	146	104	86	65	62	121	121	N/A	0	N/A	121
15	Customer Information Service Request (CISR) Fees	-	-	-	-	-	318	318	N/A	0	N/A	318
16	Community Choice Aggregation	391	1,477	2,638	1,619	2,485	5,210	5,210	1,972	0	(3,238)	5,203
17	Direct Access Services	175	160	114	47	60	703	703	N/A	0	N/A	703
18	Total	28,332	27,323	16,272	16,107	26,485	28,589	19,172	1,972	(9,417)	(3,238)	28,582

Note: TURN’s testimony was silent on all of these fees.

¹³⁴ TURN’s testimony was silent on Customer Interactions OOR.

1 **1. Cal Advocates**

2 **a) Cal Advocates' Position**

3 The only fee that Cal Advocates contests is the paper bill fee.¹³⁵ Cal Advocates'
4 opposition of the paper bill fee amounts to six arguments: (1) customers should not be charged for a
5 service that is already included in present rates and forms an integral part of the utility's cost of
6 providing service;¹³⁶ (2) SCE is only focused on a fee-based system rather than pursuing other
7 options;¹³⁷ (3) SCE did not assess the financial impacts and burden relative to the benefits of a new
8 paper bill fee for residential and non-residential customers;¹³⁸ (4) other jurisdictions (i.e., Pennsylvania
9 and West Virginia) rejected such fees;¹³⁹ (5) SCE's data indicates customers' preference for paper is
10 higher than electronic billing, and a paper bill fee as a means to encourage electronic billing is misplaced
11 and not in the best interest of customers;¹⁴⁰ and (6) SCE's proposal to introduce a new fee requires
12 proper notice and evaluation via a separate application.¹⁴¹

13 In addition to opposing the paper bill fee, Cal Advocates provides an alternative
14 proposal to SCE's paper bill fee. Cal Advocates would have the Commission impute the forecast OOR
15 from the proposed paper bill fee as an offset to base rates, but ***not authorize*** SCE to apply the fee to
16 relevant customers to actually recover the OOR. This means that SCE would be unable to recover any
17 paper bill fee costs through either base rates or OOR; to the extent a customer elects a paper bill, SCE
18 would not get any cost recovery for the cost of providing that service. Cal Advocates' justification for
19 this proposal is that it would place the financial burden on SCE to encourage customers' voluntary
20 adoption of electronic billing, and "[i]t should remain within the purview of the utility SCE to devise
21 strategies to control these costs through programs that would encourage e-billing adoption rather than
22 imposing yet another fee on ratepayers."¹⁴²

¹³⁵ Cal Advocates expressly states it does not oppose the other SCE-proposed fees. Ex. CA-13, p. 18.

¹³⁶ Ex. CA-12, p. 20.

¹³⁷ Ex. CA-12, p. 20.

¹³⁸ Ex. CA-12, pp. 20-21.

¹³⁹ See Ex. CA-12, p. 21.

¹⁴⁰ Ex. CA-12, pp. 22-24.

¹⁴¹ Ex. CA-12, pp. 20, 24.

¹⁴² Ex. CA-12, p. 25.

1 **b) SCE’s Rebuttal to Cal Advocates’ Position**

2 **(1) SCE’s Proposed Paper Bill Fee Is Consistent with OOR Principles**
3 **and Reflects the Current Normalization of Paperless Billing**

4 Cal Advocates is correct that “[h]istorically, SCE has never charged a
5 paper-bill fee to provide customers with a standard paper billing statement.”¹⁴³ The cost of providing
6 paper bills has been and is currently included in base rates as a standard operational service. This means
7 that paper bill costs are spread to all customers through distribution rates, regardless of their chosen bill
8 delivery method.¹⁴⁴ SCE further acknowledges that costs for standard operational services are properly
9 included in base rates, while costs for services above standard operational services are service fees are
10 charged directly to the individual customers and third parties who cause SCE to incur those additional
11 operational expenses.¹⁴⁵ SCE proposes a paper bill fee in this rate case because as a policy matter, SCE
12 believes that given (1) the current prevalence of electronic transactions and records as a standard means
13 of conducting business, and (2) the lower costs and increased convenience of electronic billing, and
14 (3) the reduced environmental impacts of electronic billing, *paperless should be considered the new*
15 *standard* of operations beginning in the 2025 GRC period. In this sense, customers who continue to
16 select paper bills cause all other SCE customers to incur additional operational expenses.
17 Those expenses should be recovered directly from the specific customers who cause them.
18 Electronically-billed customers should not have to pay for the cost of paper bills when they do not
19 receive one.

20 Because SCE is proposing the fee to shift paper bill costs to the specific
21 customers imposing those costs, Cal Advocates is incorrect in claiming that SCE did not consider the
22 impact of the proposed paper bill fee on its customers.¹⁴⁶ SCE did not do a cost-benefit analysis because
23 costs versus benefits or savings is not the key inquiry motivating SCE’s proposal. Rather, as previously
24 explained to Cal Advocates, the main purpose of the paper bill fee is to direct the costs associated with

¹⁴³ Ex. CA-12, p. 20.

¹⁴⁴ SCE-03, Vol. 1, pp. 123, 130.

¹⁴⁵ See Ex. SCE-03, Vol. 1, p. 119.

¹⁴⁶ Cal Advocates further asserts that SCE “did not assess the financial impacts and burden relative to the benefits of a new paper-bill fee for residential and non-residential customers.” Ex. CA-12, p. 20.

1 paper bills to only the customers who continue to receive paper bills.¹⁴⁷ It is precisely because SCE *is*
2 considering the financial impacts and burdens on customers that SCE is proposing a new fee.
3 Specifically, a paper bill fee will help alleviate the financial burden of customers who do not receive
4 paper bills but who nonetheless subsidize the costs for those who continue to do so.¹⁴⁸

5 Cal Advocates also points to data provided by SCE that supposedly
6 indicates customers who prefer paper bills outnumber customers who prefer electronic.¹⁴⁹ However, Cal
7 Advocates' extrapolation from this data is flawed. SCE's data shows an overall increase from 2018 to
8 2022 in the number of non-CARE, non-FERA paper bill residential customers.¹⁵⁰ An increase of paper
9 bill customers can be driven by various factors other than customer preference, such as general increases
10 in SCE's customer base. Nor does SCE's data showing the cumulative number of paper bills and e-bills
11 in 2022 demonstrate higher customer preference for paper bills. The better measure for whether
12 customers in a given year prefer paper versus e-bills is the e-bill adoption rate, i.e., the percentage of
13 customers who receive paper versus e-bills. 2023 data shows that at year end 43 percent of customers
14 were receiving paper bills, compared to 57 percent of customers receiving e-bills. SCE does not dispute
15 that some customers may continue to prefer paper to e-bills. Paper bills would continue to be an option
16 for those customers, for a fee that reflects the cost of providing that option. SCE strongly disagrees with
17 Cal Advocates' characterization of the proposal as a "punitive fee" that is "not in the best interest of
18 [SCE's] customers."¹⁵¹ As a ratemaking matter, service fees collected as OOR are not intended to be
19 punitive. Rather, they are a means of recovering costs of above-standard services directly from the cost-
20 causers. It would not be in the interest of the majority of electronically billed customers to subsidize the
21 costs for the shrinking minority of customers who continue to select paper bills, particularly in an
22 environment when e-bills are a standard, normalized means of transacting business.

23 In fact, although Cal Advocates refers to two jurisdictions that have
24 rejected paper bill fees, there are other service providers who do charge for paper bills. For example,

¹⁴⁷ See Appendix A, SCE's response to data request PubAdv-SCE-194-MCL, Question 5a; *see also* Ex. SCE-03, Vol. 1, pp 123-124, 130-131.

¹⁴⁸ See Appendix A, SCE's response to data request PubAdv-SCE-194-MCL, Question 5a; *see also* Ex. SCE-03, Vol. 1, pp 123-124, 130-131.

¹⁴⁹ Ex. CA-12, p. 23.

¹⁵⁰ The data also shows an overall decrease from 2018 to 2022 in the number of non-residential paper bill customers, which Cal Advocates neglects to explain.

¹⁵¹ Ex. CA-12, p. 24.

1 SCE’s research found at least five telecommunication providers, such as AT&T, Frontier, and Verizon,
2 that charge paper bill fees, ranging from \$1.50 to \$2.99 per statement.¹⁵² In addition, several banks
3 either similarly charge a fee per paper bill, or offer online overviews for free but charge a fee to
4 customers for more detailed paper statements. SCE’s research found such 13 banks that have, ranging
5 from a charge of \$1.00 to \$6.00 per statement.¹⁵³

6 Cal Advocates’ reference to Pennsylvania and West Virginia is inapposite.
7 The Pennsylvania regulation was adopted in 2016.¹⁵⁴ The practice and commonality of electronic billing
8 has changed since then. With respect to the West Virginia decision requiring Frontier to cease and desist
9 from charging a paper bill fee, the Public Service Commission of West Virginia found the fee violative
10 of a specific telephone rule in that jurisdiction that prohibits bills from containing charges for non-
11 telecommunications services or items; however, bills may contain such charges if there is good cause
12 shown and with express approval of the Public Service Commission of West Virginia.¹⁵⁵ Frontier started
13 charging the fee before seeking approval from the Public Service Commission of West Virginia.¹⁵⁶
14 Here, SCE is doing the exact opposite, by proposing its paper bill fee in this GRC for Commission
15 approval. SCE is sympathetic to the considerations weighed by the Public Service Commission of West
16 Virginia, namely the impacts of a paper bill fee on seniors, customers inexperienced with paperless
17 billing, and customers who do not have reliable access to the internet. SCE recognizes that a paper bill
18 fee may be more burdensome for certain populations relatively to others, and that is why SCE proposes
19 to *exclude* CARE and FERA customers, so as not to add any additional burden to income-qualified
20 customers.¹⁵⁷

¹⁵² See Appendix C, “Other Service Providers’ Paper Bill Fees.”

¹⁵³ See Appendix C, “Other Service Providers’ Paper Bill Fees.”

¹⁵⁴ See 52 Pa. Code § 53.85.

¹⁵⁵ See CA-12-WP, pp. 9, 17.

¹⁵⁶ See CA-12-WP, pp. 9, 17.

¹⁵⁷ See Ex. SCE-03, Vol. 1, p. 124. SCE does not exclude seniors, those inexperienced with paperless billing, and those who lack reliable internet access because SCE does not current track those customer populations and thus does not have a readily available way of excluding them from the fee.

1 **(2) The Paper Bill Fee Would Not Replace, but Complement Other**
2 **Methods SCE Already Employs to Encourage Electronic Billing**

3 Cal Advocates claims that SCE is only focused on a fee-based system to
4 the exclusion of other options of encouraging adoption of electronic billing.¹⁵⁸ That is false. SCE has
5 various efforts, separate from its paper bill fee proposal to increase e-bill adoption of customers, as
6 discussed in Ex. SCE-03, Vol. 1, p. 35. Despite this, the individual cost of a paper bill continues to
7 increase,¹⁵⁹ because of increasing postage costs.¹⁶⁰ SCE will continue to pursue multiple efforts to
8 increase e-bill adoption. But even as more customers elect to receive e-bills, SCE maintains that e-bill
9 customers should not pay for costs of paper bills that they no longer receive.

10 **(3) Evaluation in a Separate Application Is Unnecessary**

11 Cal Advocates argues it was procedurally improper for SCE to propose a
12 paper bill fee in the GRC, because a separate application (along with separate notice and review
13 attendant to that application) was required.¹⁶¹ Cal Advocates summarily states that a separate application
14 is required,¹⁶² but does not point to any specific rule or requirement to support its position. Cal
15 Advocates raises vague concerns about (1) full evaluation pursuant to Cal. Pub. Util. Code § 451,¹⁶³
16 (2) proper notice and review in compliance with the Commission’s Rules of Practice and Procedure,¹⁶⁴
17 and (3) evaluation in a “proper application filing, where ratepayers can submit comments and participate
18 in public hearings.”¹⁶⁵ All of these concerns are satisfied with the GRC, which is a “proper” application
19 whereby (1) the Commission can and does evaluate whether SCE’s sought relief is “just and

¹⁵⁸ Ex. CA-12, p. 20.

¹⁵⁹ See Appendix A, SCE’s supplemental response to data request PubAdv-SCE-194-MCL, Question 4b (showing a paper bill fee calculation of \$0.65 using year end 2023 data).

¹⁶⁰ From January 2020 to January 2024, postage has increased by nearly 31 percent due to rate-setting changes implemented by the United States Postal Service in 2021. In November 2020, the Postal Regulatory Commission (PRC) deemed the postage rate-setting system established by the Consumer Price Index (CPI) by the Postal Accountability and Enhancement Act (PAEA) of 2006 inadequate and gave the Postal Service more rate authority when establishing prices for mailing services. In 2021, the Postal Service was given the ability to implement Market Dominant pricing adjustments based on declining mail volumes and growing logistics costs.

¹⁶¹ Ex. CA-12, pp. 20, 24.

¹⁶² See Ex. CA-12, pp. 20, 24.

¹⁶³ Ex. CA-12, p. 20.

¹⁶⁴ Ex. CA-12, p. 24.

¹⁶⁵ Ex. CA-12, p. 24.

1 reasonable”;¹⁶⁶ (2) SCE provides proper notice and submits application documents for review in
2 compliance with the Commission’s Rules of Practice and Procedure;¹⁶⁷ and (3) customers can submit
3 comments and participate in public hearings.¹⁶⁸ In addition, during the GRC, intervening parties have
4 the opportunity to file testimony, reply briefs, submit data requests and examine witnesses at evidentiary
5 hearings. Therefore, any new fee proposed as part of the GRC does receive proper notice and the
6 opportunity for sufficient review. Further, new service fees to be collected as OOR are properly
7 proposed and approved in GRCs.¹⁶⁹ It would contravene longstanding Commission practice as well as
8 administrative practicality if there were a requirement that every new service fee be proposed in its own
9 separate application.

10 Finally, Cal Advocates is incorrect when it asserts that the proposed fee by
11 SCE is not identified within the “scope” of this GRC.¹⁷⁰ Although new proposed service fees are not
12 expressly mentioned at that level of specificity in the scoping memo, the scoping memo specifies that
13 one issue “to be determined or otherwise considered” is “[w]hether SCE’s proposed revenue
14 requirements, proposed costs, and proposed recovery mechanisms for TY 2025 are just and reasonable,
15 and whether they should be approved by the Commission.”¹⁷¹ SCE’s paper bill fee proposal is part of
16 SCE’s proposed revenue requirement, SCE’s proposed costs for providing paper bills, and SCE’s
17 proposed recovery mechanism to recover as OOR instead through base rates. The paper bill fee proposal
18 is squarely within scope of this GRC.

¹⁶⁶ See, e.g., D.21-08-036 (SCE’s 2021 GRC Decision), pp. 9-10 (footnote omitted) (stating Cal. Pub. Util. Code § 451 provides that “all charges demanded or received by any public utility . . . shall be just and reasonable” and “SCE has the burden of affirmatively establishing the reasonableness of all aspects of its application”).

¹⁶⁷ See Proof of Rule 3.2 Compliance in Connection with Southern California Edison Company’s (U 338-E) Application for Authority to Increase its Authorized Revenues for Electric Service in 2025, Among Other Things, and to Reflect That Increase in Rates, A.23-05-010 (filed July 11, 2023).

¹⁶⁸ See Administrative Law Judges’ Ruling Noticing Public Participation Hearings, A.23-05-010 (filed January 4, 2024); Southern California Edison Company’s (U 338-E) Proof of Compliance with Rule 13.1(B) & (C) of the Commission’s Rules of Practice and Procedure, A.23-05-010 (filed March 1, 2024).

¹⁶⁹ See D.21-08-036 (SCE’s 2021 GRC Decision), p. 321 (approving elements of SCE’s Customer Interactions OOR forecast which consisted of newly proposed fees, such as new Customer Information Standardized Request (CISR) fees, Direct Access service fees, and Demand Response Program service fees.

¹⁷⁰ Ex. CA-13, p. 24.

¹⁷¹ Assigned Commissioner’s Scoping Memo and Ruling, A.23-05-010 (Filed September 5, 2023), p. 3.

1 CalCCA’s opposition to the MAMF fee is presented in Mr. Fulmer’s testimony
2 and is summarized as follows:¹⁷⁶ (1) the total projected labor underlying the MAMF fee “strikes [Mr.
3 Fulmer] as grossly excessive”;¹⁷⁷ (2) the CCAs expected more efficiency from SCE in providing CCA
4 customer service and billing service after CSRP implementation;¹⁷⁸ (3) almost none of the projected
5 labor increase can be attributed to an increase in departed customers;¹⁷⁹ (4) there is inadequate support
6 for the projected labor increase, specifically because SCE’s time studies and estimates for work
7 activities underlying the fee are inadequate;¹⁸⁰ (5) SCE is attempting to recover costs for new activities
8 that are not included in the current MAMF, yet SCE’s proposed elimination of another fee does not fully
9 account for the MAMF increase attributable to new activities;¹⁸¹ and (6) CCAs should not be charged for
10 excessive exception processing and other work that is unlikely due to CCA error.¹⁸²

11 For the EDI-VAN fee, CalCCA agrees with SCE’s proposed EDI-VAN fee of
12 \$0.02 cents per service account per month for 2025, but also recommends that the fee be eliminated
13 starting in 2026 along with elimination of the underlying service that is the basis of the fee.¹⁸³

14 CalCCA mainly argues that Commission-ordered elimination is needed because SCE’s efforts to
15 eliminate the EDI-VAN, which was part of the 2021 GRC Settlement Agreement, have been
16 inadequate.¹⁸⁴

¹⁷⁶ Of CalCCA’s witnesses providing prepared testimony submitted February 29, 2024, only Mr. Fulmer directly and specifically contests the MAMF. Two other witnesses, Mr. Kilgore and Dr. Edwards-Greer, submit testimony that vaguely purport to “inform the Commission’s consideration” of SCE’s proposed service fees. Exs. CalCCA C. Kilgore, p. i; CalCCA M. Edwards-Greer, p. i. However, that testimony does not directly or specifically address any specific identified fee. SCE responds to that testimony, along with Mr. Fulmer’s testimony that does not directly or specifically address any specific identified fee, in Chapter VI.

¹⁷⁷ Ex. CalCCA M. Fulmer, p. 16.

¹⁷⁸ Ex. CalCCA M. Fulmer, p. 16.

¹⁷⁹ Ex. CalCCA M. Fulmer, p. 16.

¹⁸⁰ See Ex. CalCCA M. Fulmer, pp. 17-24.

¹⁸¹ See Ex. CalCCA M. Fulmer, pp. 24-25.

¹⁸² See Ex. CalCCA M. Fulmer, pp. 25-31.

¹⁸³ Ex. CalCCA M. Fulmer, p. 35.

¹⁸⁴ See Ex. CalCCA M. Fulmer, pp. 33-35.

1 **b) SCE’s Rebuttal to CalCCA’s Position**

2 **(1) CCAs Must Bear the Costs of Services Provided to CCAs**

3 State law and Commission precedent require SCE to recover all costs
4 specifically attributable to CCAs from CCA customers so that SCE’s bundled service customers remain
5 indifferent to load departing to CCA service and do not subsidize CCA customers.¹⁸⁵ Therefore, SCE is
6 required to charge CCAs for all of SCE’s reasonable costs of notices, billing, metering, collections,
7 customer communication, and other services provided to a CCA.¹⁸⁶ CalCCA agrees that costs should not
8 be shifted from unbundled to bundled customers.¹⁸⁷

9 Because of these ratemaking principles, the costs of services provided to a
10 CCA or its customers are generally paid for by the CCA or its customers through service fees charged
11 directly to them. SCE’s initial GRC revenue requirement includes the revenue requirement for all of its
12 O&M, including for CCA work. In order to make all other customers “indifferent” to these CCA costs,
13 the estimated revenue generated from CCA fees is included in OOR and is used as a credit to offset the
14 cost included in the final GRC revenue requirement. If the Commission reduces the amount of CCA
15 OOR, SCE’s GRC revenue requirement that all other customers must pay will increase on a 1:1 ratio.
16 If the Commission increases the amount of CCA OOR, SCE’s GRC revenue requirement for all other
17 customers will decrease on a 1:1 ratio. It is a zero-sum game. As such, if the CCA OOR is not
18 compensatory, all other customers will inequitably subsidize CCA customers. That could also lead to
19 statutorily impermissible cost shifting to bundled service customers.

20 **(2) SCE’s Proposed MAMF Increase Is Justified**

21 SCE proposes a MAMF increase from the current amount of \$0.04 to
22 \$0.21, a variance of 425 percent.¹⁸⁸ SCE recognizes how an initial comparison of only these two
23 numbers, when done in isolation, could cause “sticker shock.” However, a closer examination of SCE’s
24 proposal demonstrates that this increase is justified and necessary to reasonably attribute the costs of
25 CCA account maintenance to CCAs, so that those costs are not borne by bundled customers.

¹⁸⁵ See Cal. Pub. Util. Code § 366.2(a)(4) (stating that CCA implementation “shall not result in a shifting of costs between the customers of the community choice aggregator and the bundled service customers of an electrical corporation . . .”).

¹⁸⁶ See Cal. Pub. Util. Code § 366.2(c)(20).

¹⁸⁷ See Ex. CalCCA M. Fulmer, p. 5.

¹⁸⁸ Ex. SCE-03, Vol. 1E3, p. 149E3, Table V-49, line 15.

1 SCE properly identified the activities that should underlie the MAMF, and properly forecasted the time
2 and labor costs associated with each of those activities.

3 (a) **The Proposed MAMF Increase Properly Accounts for New**
4 **CCA Work**

5 CalCCA correctly points out that elimination of the Monthly
6 Account Maintenance Fee – Per CCA fee due to consolidation into the MAMF per SA does not fully
7 account for the increase in the MAMF per SA fee.¹⁸⁹ That is because, as explained in SCE’s initial
8 testimony, the proposed MAMF reflects increasing levels of work, in terms of both volume and
9 complexity, as a result of increasing CCA service accounts.¹⁹⁰ CalCCA argues that almost none of
10 SCE’s proposed MAMF labor increase can be attributed to an increase in CCA customers, because, by
11 CalCCA’s calculations, CCA accounts have increased by only 2 percent since the last GRC¹⁹¹ while
12 SCE’s proposed MAMF labor increase from the last GRC is 550 percent.¹⁹² CalCCA’s comparison is
13 misplaced. To juxtapose the percent increase of MAMF labor from the last GRC with the percent
14 increase of CCA customers from the last GRC, the relevant information for comparison are the recorded
15 service accounts for 2018 and 2022. That is because the last GRC’s MAMF of \$0.04 was developed

¹⁸⁹ See Ex. CalCCA M. Fulmer, p. 25.

¹⁹⁰ See Ex. SCE-03, Vol. 1, p. 149; see also Appendix A, SCE’s response to data request CalCCA-SCE-004, Question 4.4 (comparing activities underlying the current MAMF with activities underlying the proposed MAMF).

¹⁹¹ Ex. CalCCA M. Fulmer, p. 16. Mr. Fulmer’s calculation of 2 percent is flawed in many respects. First, Mr. Fulmer appears to calculate the “2 percent increase in departed load as compared to the prior GRC” by comparing the 2021 forecasted (as of the 2021 GRC) *monthly* CCA SAs from the last GRC (1,543,129) with 2022 recorded *end-of-year*, net of opt-out CCA SAs (1,575,030). These two numbers are not comparable. The appropriate comparable 2021 forecast number to use would have been 1,567,573. Second, Mr. Fulmer states the 2 percent increase is “relative to 2023, the year for which SCE developed its MAMF fees.” Ex. CalCCA M. Fulmer, p. 16 n.33. Mr. Fulmer incorrectly states that 2023 is the year for which SCE developed its MAMF fees. It is unclear why Mr. Fulmer alleges the 2 percent is relative to 2023, when he arrived at 2 percent as the difference between 2021- and 2022-related data (the referenced 1,543,129 and 1,575,030, respectively). Moreover, SCE’s forecasted MAMF is not for 2023 but for the 2025 TY. Third, Mr. Fulmer also states that the “projected increase in CCA accounts in the test year, 2025, is 4%,” and appears to calculate 4 percent by comparing the 2021 *monthly* CCA SAs from the last GRC (1,543,129) with 2025 forecasted *end-of-year*, net of opt-out CCA SAs (1,600,642). Again, these numbers are not comparable and the analogous 2021 forecast number to use would have been 1,567,573. Finally, as SCE explains in this section, to compare the number of service accounts from the last GRC to this GRC, the appropriate years for comparison are 2018 recorded and 2022 recorded. These are the BYs for the 2021 GRC and 2025 GRC, respectively, that informed the current and proposed MAMF fee, respectively.

¹⁹² SCE could not determine how CalCCA arrived at 550 percent based on the supporting documentation Mr. Fulmer references (i.e., “Fulmer Workpapers (Attachment MF-4)”).

1 based on CCA account maintenance work levels in 2018, the BY for SCE’s 2021 GRC. In 2018, SCE
2 supported 152,000 CCA SAs.¹⁹³ The proposed 2025 GRC MAMF of \$0.21 was developed based on
3 CCA account maintenance work levels in 2022, the BY for this 2025 GRC. In 2022, SCE supported
4 1.58 million CCA SAs.¹⁹⁴ Thus, the appropriate comparison is that even if the proposed MAMF labor
5 increase is 550 percent from the last GRC as CalCCA contends, the corresponding percent increase of
6 CCA accounts in that same period is **938** percent (an increase from 152,000 SAs to 1.58 million SAs).¹⁹⁵

7
8 Given the significant increase of CCA accounts since the current
9 MAMF fee was proposed and litigated in the last GRC, the current fee of \$0.04 is grossly outdated and
10 underinclusive of actual CCA work volumes. The fact that this increased volume of work is not in the
11 existing MAMF simply means CCAs are currently receiving the benefits of these services without
12 paying for them. It is not grounds for excluding them from the proposed fees. The increased levels of
13 account maintenance work are properly accounted for in the new proposed fee of \$0.21, which must
14 support 2025 forecasted year CCA volumes of 1.60 million SAs.

15 SCE’s proposed MAMF is also informed by information newly
16 available since the last GRC regarding the actual costs to perform account maintenance work.¹⁹⁶
17 Namely, the new SAP system enabled more effective and efficient tracking of CCA activities, resulting
18 in improved visibility to CCA activities.¹⁹⁷ As a result, SCE is better positioned in this GRC to identify
19 and attribute work to CCAs. SCE’s proposed MAMF is based on 2022 recorded occurrences, which
20 reflects exception and assistance occurrences after a period of system and process stabilization following
21 the new system implementation in April 2021. Because these activities can now be identified and
reasonably attributable to CCA work, they should be properly included in CCA fees going forward.

¹⁹³ See Ex. SCE-03, Vol. 1, p. 149; 2021 GRC WP SCE-03, Vol. 6AE, p. 99E, line 7.

¹⁹⁴ See Ex. SCE-03, Vol. 1, p. 149; Appendix B, WP-SCE-03, Vol. 1E4, p. 192E4.

¹⁹⁵ $(1,575,030 - 151,705) / 151,705 = 938$ percent.

¹⁹⁶ See Ex. SCE-03, Vol. 1, p. 148.

¹⁹⁷ See Appendix A, SCE’s response to data request CalCCA-SCE-004, Question 4.6c (“[M]oving to the new SAP system increased visibility to the CCA account exception work as well as CCA assistance work.”).

1 (b) **SCE's Time Studies and Estimates Justify the Projected Labor**
2 **Underlying the MAMF**

3 To determine the appropriate MAMF amount, for each activity
4 included in the MAMF, SCE determined the labor processing time by conducting a time study.¹⁹⁸
5 Time studies were conducted by either measuring the actual time spent on each step/process (i.e., an
6 observation-based time study) or estimating the average time required (i.e., an estimate-based time
7 study). For the seven activities underlying the MAMF, SCE conducted fifteen observation-based time
8 studies and seven estimate-based time studies. Both these methods adequately and reasonably estimated
9 the labor processing time attributable to each MAMF activity.

10 CalCCA's sole reason for the alleged inadequacy of the
11 observation-based time studies is the number of observations SCE conducted. CalCCA claims three or
12 four observations per time study is insufficient.¹⁹⁹ Not so. These time studies involved routine,
13 repeatable steps that SCE personnel have performed many times in the past. It does not require a large
14 number of repetitions for SCE to obtain a representative estimate of the time required to perform these
15 steps. SCE's time studies appropriately balanced the time and costs of conducting the time studies
16 against how many time studies are needed to provide reasonably accurate results. Based on SCE's
17 experience, expertise, and judgment, SCE determined that number was three or four depending on the
18 specific MAMF sub-activity. Further, after conducting each observation, SCE relied on its subject
19 matter experts to confirm that the time measurement was accurate and reflective of the event observed.

20 CalCCA cherry-picked an example with notable variance in the
21 three observations to somehow suggest more observations are needed.²⁰⁰ In that example,²⁰¹ there were
22 two observations of approximately 14 minutes and one observation of approximately 41 minutes.
23 CalCCA questions the veracity of the first two observations because they are so close to each other,²⁰²
24 while also suggesting more observations are needed because the third observation is so far apart from

¹⁹⁸ See Ex. SCE-03, Vol. 1, pp. 146-147.

¹⁹⁹ See Ex. CalCCA M. Fulmer, p. 22.

²⁰⁰ See Ex. CalCCA M. Fulmer, p. 22.

²⁰¹ The example is the CCA account billed current/complete sub-activity.

²⁰² See Ex. CalCCA M. Fulmer, p. 22 ("Is it coincidence that the length of two of the observations are within 15 seconds of each other?").

1 the others.²⁰³ Contrary to CalCCA’s suggestions, however, these results actually demonstrate how SCE
2 conducted a sample of observations that is representative of the work performed for the sub-activity.
3 SCE’s subject matter experts who perform this work confirmed that this activity has two variations with
4 different time demands: approximately two-thirds of occurrences for this activity are simpler and require
5 about 14 minutes to complete, whereas about approximately one-third of occurrences are more complex
6 and take about 41 minutes to complete. SCE undertook this kind of confirmation for all its observation-
7 based time studies. Therefore, although observation times may vary, SCE conducted an appropriate
8 sample of observations, in terms of both number and composition of the types of events, to reasonably
9 represent the time spent on simpler versus more complex requests.

10 For the estimate-based time studies, CalCCA argues SCE did not
11 support its estimation method because in its view there is only minimal information concerning how
12 these estimates were derived and SCE relied on subject matter experts’ historical experience to make
13 these estimates.²⁰⁴ As an initial matter, it is important to note there are multiple ways to determine labor
14 processing times. Observation-based time studies are one method, but not always the most appropriate
15 or cost-effective approach. Other approaches relying on historical experience and expertise can also
16 provide equally if not more valid and accurate times.

17 SCE took two approaches for estimating average processing time,
18 summarized as follows:²⁰⁵ First, for CCA Assistance and Account Exception Processing - Information
19 Technology Related activities (shown at WP SCE-03, Vol. 1, pp. 186 (“MAMF Workpaper”)²⁰⁶) in lines
20 21-24), an SCE IT subject matter expert of resource planning provided an estimated average processing
21 time for a given occurrence based upon 2022 historical experience. This included considerations for
22 targeted response time according to priority level (e.g., priority 3 targeted response is 8 business hours
23 and priority 4 targeted response is 5 business days), providing a 24/7 availability and support window,
24 different skill sets required to support multiple processes and functionalities, and efforts to investigate,
25 resolve, permanent fix, and optimize overall system performance. SCE did not perform observation-
26 based time studies for these sub-activities because the nature of the work consists of multiple, and

²⁰³ See Ex. CalCCA M. Fulmer, p. 22 (“Is the 41 minute observation an outlier?”).

²⁰⁴ See Ex. CalCCA M. Fulmer, p. 24.

²⁰⁵ See Appendix A, SCE’s response to data request CalCCA-SCE-003, Question 3.14; Appendix A, SCE’s responses to data request CalCCA-SCE-006, Questions 6.1a-b and Question 6.8.

²⁰⁶ Appendix B, WP SCE-03, Vol. 1E4, p. 186E4.

1 occasionally overlapping workstreams—such as investigating, resolving, implementing permanent fixes,
2 and optimizing overall system performance—that cannot be as cleanly measured with a start/stop timer.

3 Second, for Operational Activities related to Customer Call Center,
4 Customer Choice Services, Information Technology, and Billing activities (shown in the MAMF
5 workpaper in lines 25-45), SCE estimated these meeting hours. For items like meetings, which generally
6 have planned, fixed timing at a recurring cadence, SCE determined that subject matter experts would be
7 able to provide reasonably accurate estimates of meeting times based on factors like historical
8 experience, and thus there is no need to perform specific observations for such events (i.e., timing
9 specific meetings with a stopwatch). For all activities that were time-studied by estimation, SCE
10 determined that estimation was more effective and efficient than an observation-based study to achieve
11 reasonably accurate results.

12 (c) **CalCCA Fails to Substantiate Claims of SCE “Error” and**
13 **“Unreasonableness”**

14 CalCCA takes additional issue with three categories of MAMF
15 sub-activities by asserting they are likely due to SCE’s error. The first category is work that CalCCA
16 calls “direct exception processing,” which CalCCA identifies as the sub-activities listed in Ex. CalCCA
17 M. Fulmer, p. 27, Table 7.²⁰⁷ The second category consists of sub-activities “BCD CCS Support
18 Request: CCA Inquiries” (MAMF WP Line 4), “CCA Final Bill Not Received” (MAMF WP Line 5),
19 and “CCA Billing Inquiries” (MAMF WP Line 19).²⁰⁸ The third category is the IT Related Operational
20 Activities.²⁰⁹

21 For all three of these categories, CalCCA fails to substantiate their
22 claims of SCE error. As SCE has explained to CalCCA, SCE cannot confirm whether any given
23 exception processing event or other work arises due to a CCA error, an SCE error, or some other reason,
24 because SCE does not track that information.²¹⁰ Moreover, CalCCA’s reasoning to conclude that items

²⁰⁷ CalCCA is incorrect that all these sub-activities are attributable to exception processing, because they may also include account assistance work. SCE cannot separate the exception and account assistance work based on available data.

²⁰⁸ Ex. CalCCA M. Fulmer, p. 28.

²⁰⁹ See Ex. CalCCA M. Fulmer, pp. 28-29. CalCCA asserts these activities account for \$0.007 of the MAMF. See Ex. CalCCA M. Fulmer, p. 29. The correct value for the IT Related Operational Activities is actually \$0.03 as shown in Appendix B, WP SCE-03, Vol. 1E4, p. 186E4.

²¹⁰ See Appendix A, SCE’s responses to data request CalCCA-SCE-003, Questions 3.6, 3.7, 3.8, 3.9, and 3.10.

1 provided unreasonable level of service. Rather, as explained above, it is the result of increasing service
2 accounts and increased visibility to the CCA work through SCE's new SAP system, despite reasonable
3 efforts by SCE to manage CCA work and improve exception rates.

4 CalCCA's allegations that SCE is deficient in exception processing
5 relative to other utilities²²² is also unsupported. The source of CalCCA's data regarding Pacific Gas and
6 Electric Company (PG&E) and San Diego Gas & Electric Company (SDG&E) is unclear, and SCE
7 cannot speak to the validity of that data. In SCE's view, using Calpine (the CCAs' back-office vendor)
8 exception rates to compare exception performance between utilities is likely an oversimplification as
9 each utility has different billing systems, organizational structures and processes, and different ways of
10 defining exceptions. Nonetheless, even if one were to assume the validity of CalCCA's data, CalCCA's
11 own figures demonstrate SCE's improvement from a 9.66 percent exception rate in 2020 down to
12 5.96 percent in 2023.²²³ Based on SCE's data, exceptions also went down 2019 to 2020 and from 2022
13 to 2023.²²⁴

14 CalCCA also claims that Calpine's data does not align with SCE's
15 data, in that Calpine's data shows a dramatic decrease in exceptions while SCE's proposed MAMF
16 workpapers show a dramatic increase in exceptions.²²⁵ It is unclear where Calpine gets its data from and
17 how it aligns or correlates to the current and proposed MAMF fee. SCE's provided data shows
18 exceptions, as they pertain to SCE's proposed service fees, and demonstrates a decrease from 2019 to
19 2020 and from 2022 to 2023.²²⁶ The dramatic increase in MAMF exceptions, despite trends of declining
20 exceptions, is because of (1) moving to the new SAP system increased visibility to CCA exception and
21 assistance work, thereby increasing recorded occurrences of exception levels as well as capturing
22 occurrences of assistance work and (2) increasing CCA service accounts as explained in SCE's response
23 to data request CalCCA-SCE-004, Question 4.6b and c, and section V.A.3.(b)(2)(a) above.

24 SCE has made significant strides in reducing its exception work.
25 However, as explained above, exceptions will continue to arise in the regular course of CCA-related
26 business. When activities are operationally necessary for CCA account maintenance, pursuant to statute

²²² See Ex. CalCCA M. Fulmer, p. 30.

²²³ See Ex. CalCCA M. Fulmer, p. 30.

²²⁴ For full analysis, see Appendix A, SCE's response to data request CalCCA-SCE-004, Question 4.6b and c.

²²⁵ See Ex. CalCCA M. Fulmer, p. 30.

²²⁶ See Appendix A, SCE's response to data request CalCCA-SCE-004, Question 4.6.

1 the costs for such work must be included in CCA service fees for recovery from CCAs, as opposed to
2 being shifted to remaining bundled service customers.

3 **(3) SCE’s EDI-VAN Proposal Is Consistent with the Settlement**
4 **Agreement and Needed for the Entire GRC Period**

5 The EDI-VAN fee relates to SCE’s cost to transmit data in Electronic Data
6 Interchange (EDI) formatting through the Value-Added Network (VAN). A VAN provider is an entity
7 that acts as an intermediary between SCE and the CCAs to transfer data. The current EDI-VAN fee is
8 \$0.05 per service account per month. In this GRC, SCE proposes to reduce the EDI-VAN fee to \$0.02
9 per service account per month.²²⁷ CalCCA agrees with SCE’s EDI-VAN fee proposal for 2025 but
10 requests this fee be eliminated in 2026.²²⁸

11 **(a) SCE Has Fully Complied with Its Settlement Agreement**
12 **Obligations to Attempt Reducing or Eliminating the EDI-VAN**
13 **Fee**

14 CalCCA incorrectly claims that SCE’s efforts to comply with the
15 Settlement Agreement are inadequate. The Settlement Agreement does not require SCE to eliminate the
16 EDI-VAN fee. Rather, the Settlement Agreement states that “SCE agrees to work with the [California
17 Choice Energy Authority (CalChoice) and Clean Power Alliance of Southern California (CPA)], and,
18 upon request, [CalChoice and CPA’s] designated back-office provider, to investigate and potentially
19 implement potential automation or other processes with the goal[] of: . . . reducing or eliminating the
20 EDI-VAN charge. This effort will include examining the viability and costs to further automate
21 processes as recommended by the CCAs.”²²⁹ SCE has made efforts to begin the project to provide an
22 alternative to VAN service, and has provided details on its efforts in its response to data request
23 CalCCA-SCE-004, Question 4.2.²³⁰ Despite implementation efforts, SCE has not implemented the EDI-
24 VAN technology project yet; however, SCE has made significant strides in reducing the EDI-VAN costs
25 by renegotiating the vendor contracts.

²²⁷ Ex. SCE-03, Vol. 1, p. 149, Table-V49, line 10.

²²⁸ Ex. CalCCA M. Fulmer, p. 31.

²²⁹ A.19-08-013, Joint Motion By Southern California Edison Company (U 338-E), California Choice Energy Authority, and the Clean Power Alliance of Southern California for Approval of 2021 General Rate Case Settlement Agreement (filed September 10, 2020), Attachment A, p. A6.

²³⁰ See Appendix A, SCE’s response to data request CalCCA-SCE-004, Question 4.2.

1 **4. Conclusion**

2 Cal Advocates' opposition to the paper bill fee is misplaced, and its alternative proposal
3 should be disregarded as fundamentally inconsistent with cost-of-service ratemaking. CalCCA's
4 opposition to the MAMF and EDI-VAN also lack merit for the reasons explained above. Costs
5 attributable to CCAs or their customers must be collected from CCAs or their customers through service
6 fees, to avoid shifting those costs to bundled customers. The Commission should adopt SCE's OOR
7 forecast as proposed.

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VI.

BILLING PRACTICES & POLICIES

In this chapter, SCE addresses testimony submitted by CalCCA regarding various SCE billing practices and procedures. Specifically, SCE addresses the entirety of Claude Kilgore’s testimony, the entirety of Dr. Monique Edwards-Greer’s testimony, and Mark Fulmer’s testimony regarding SCE’s practice of backbilling CCA customers.²³⁶ The remainder of Mark Fulmer’s testimony regarding SCE’s proposed CCA fees is addressed in Chapter V above.

A. CalCCA

1. CalCCA’s Position

CalCCA provided testimony by Claude Kilgore, Dr. Monique Edwards-Greer, and Mark Fulmer recommending various changes to SCE’s billing practices and policies. CalCCA offers the testimony because “[i]n this case, the Commission will consider the scope of services SCE provides to CCA customers and the associated costs it proposes to recover from these customers via its CCA service fees” and the testimony is intended to “inform the Commission’s consideration of this issue.”²³⁷ The testimony does not directly or specifically contest any particular O&M, capital, or OOR service fee request in SCE’s application. It does not contest any quantified amount of SCE’s request, nor does it identify a particular service fee that it asserts should be reduced as a result.

The three witnesses’ testimony on these issues amounts to four recommendations: (1) the Commission should order SCE to prioritize work aimed at significantly reducing its billing error rates over the GRC period;²³⁸ (2) the Commission should order SCE to treat bundled and unbundled customers equally in its Rule 17 backbilling practices;²³⁹ (3) the Commission should order SCE to stop its practice of clawing back funds already remitted to CCAs, and re-implement its practice of utilizing additional adjustment codes;²⁴⁰ and (4) the Commission should order that, when SCE resolves a billing issue that results in a reduction of charges originally invoiced, SCE should only reverse from the CCA’s deposit the difference between the original payment amount and the new invoice amount, unless the

²³⁶ Ex. CalCCA M. Fulmer, pp. 37-46.

²³⁷ Ex. CalCCA C. Kilgore, p. i; *see also* Ex. M. Edwards-Greer, pp. 2-3.

²³⁸ *See* Ex. CalCCA M. Edwards-Greer, p. i; *see also* Ex. CalCCA C. Kilgore, p. 5.

²³⁹ *See* Ex. CalCCA M. Edwards-Greer, pp. i-ii; Ex. CalCCA M. Fulmer, pp. 45-46.

²⁴⁰ *See* Ex. CalCCA M. Edwards-Greer, p. ii.

1 corrections are neutral or result in excess charges, and remit all funds with the specific relevant Contract
2 Account and Point of Delivery (POD) ID details.²⁴¹

3 **2. SCE's Rebuttal to CalCCA's Position**

4 **a) SCE Has Already Improved Its Billing Performance and Is Committed to**
5 **Continued Progress**

6 As discussed in Exhibit SCE-03, Vol. 01, p. 16, Table II-4, SCE observed an
7 *overall* decline in its Billing Performance measures (such as Revenue Billed, Customers Billed, Bills
8 Prepared Accurately) with the implementation of SCE's new billing system. SCE generally measures
9 billing performance metrics holistically across all customers (bundled and unbundled) and not at the
10 specific individual CCA level.²⁴² SCE began experiencing higher-than-normal delayed bill volume and
11 lower billed revenue during the implementation of SCE's new billing system. However, since 2021,
12 SCE has seen a return to historical performance levels for these metrics as SCE works diligently to
13 stabilize billing system operations and continues prioritizing this work. SCE underestimated the impact
14 of the process and procedural changes that the system change would have on the billing operations but
15 continues to work to improve its work processes. These efforts have included additional vendor
16 resources, system enhancements, robotics process automation, and other technical solutions to reduce or
17 eliminate billing volume exceptions.

18 CalCCA offers the testimony of Mr. Kilgore to discuss the experience of one
19 particular CCA, Desert Community Energy,²⁴³ and the testimony of Dr. Edwards-Greer to discuss the
20 experience of another CCA, Clean Power Alliance (CPA).²⁴⁴ Both Mr. Kilgore and Dr. Edwards-Greer
21 speak to concerns about the number of billing issues driven by missing usage, and characterize missing
22 usage issues as SCE's failure to provide timely customer usage data.²⁴⁵ As context, there are two
23 primary workstreams related to a missing usage issue for a CCA. The first involves a scenario where a
24 CCA customer received a bill, but a correction to that bill (i.e., a re-bill) is needed. The second involves

²⁴¹ See Ex. CalCCA M. Edwards-Greer, p. ii.

²⁴² Therefore, SCE cannot confirm the specific alleged 2018 experience of CPA as discussed by Dr. Edwards-Greer. See Ex. CalCCA Ex. M. Edwards-Greer, p. 7.

²⁴³ See Ex. CalCCA C. Kilgore, pp. 1-2.

²⁴⁴ See Ex. CalCCA M. Edwards-Greer, pp. 1-2.

²⁴⁵ See Ex. CalCCA M. Edwards-Greer, p. 8; Ex. CalCCA C. Kilgore, p. 3.

1 a scenario where a CCA customer does not receive an initial bill at all (i.e., a delayed bill).²⁴⁶
2 With respect to the first scenario, most account corrections arise not due to any particular person’s or
3 entity’s “fault,” but simply because of routine customer-initiated requests or activities. These activities
4 include changes related to moving in or out, and adjustments to rates or programs. These occurrences are
5 not necessarily all “billing errors,” but do result in a need to correct billing charges for customer
6 accounts to support billing accuracy.

7 With respect to the second scenario of delayed bills, most missing usage
8 occurrences arise due to meter communication failures or other meter issues, like usage validation issues
9 where meters provide faulty reads. (These issues can also contribute to exceptions in the first
10 workstream.) As discussed in Ex. SCE-02, Vol. 3, p. 18, SCE is seeing increased meter failures due to
11 the aging SmartConnect Meter Population (also referred to as installed AMI 1.0 meters) resulting in
12 missing or delayed usage data. Further, as discussed in Ex. SCE-02, Vol. 3, p. 29, SCE is planning for
13 and seeking approval for the replacement of the existing aging meters through AMI 2.0. In the
14 meantime, SCE estimates missing data based on current tariff rules. In addition, when there are meter
15 communication failures or other meter-read issues that cause usage-related exceptions, SCE responds
16 appropriately by deploying field personnel to perform pick-up reads and collect other data needed to
17 process accurate customer bills.

18 Dr. Edwards-Greer attempts to argue missing usage issues have “become
19 commonplace for CPA to, at any given point in time, have thousands of bill periods of missing usage
20 that continue to age without resolution,” by pointing to the number of CPA customers’ bill periods with
21 missing usage from January 10, 2024 and February 8, 2024.²⁴⁷ The bill periods with missing usage data
22 is from only one table in the monthly usage reconciliation report from SCE, and presents a snapshot of
23 the then-pending data requiring reconciliation between Calpine and SCE. Dr. Edwards-Greer alleges
24 these tables “show over 20,000 bill periods of missing usage for each monthly update.”²⁴⁸ Dr. Edwards-

²⁴⁶ Dr. Edwards-Greer mentions three “most common types of issues faced by CPA customers,” (1) account corrections and rebills, (2) missing usage, and (3) issuance of large first bills due to delayed enrollment in CCA service. *See* Ex. CalCCA M. Edwards-Greer, p. 5. These are not separate but rather inter-related and overlapping issues. An account correction results in a re-bill, which appears to the CCA as missing usage for the periods being re-billed. In addition, missing usage resulting from a delayed bill is what causes the issuance of a large first bill due to delayed enrollment in CCA service.

²⁴⁷ Ex. CalCCA M. Edwards-Greer, p. 6.

²⁴⁸ Ex. CalCCA M. Edwards-Greer, p. 6.

1 Greer elected not to provide another chart included on the same page of the February 8, 2024 report,²⁴⁹
2 which reflects the backlog reduction of CPA’s missing usage decline from 24,509 billing periods in
3 November 2023 to 7,923 billing periods in February 2024, an approximately 68 percent reduction in
4 missing usage backlog in three months. Moreover, although there continue to be missing usage instances
5 from month to month, that does not mean those items simply “continue to age without resolution”; those
6 items are being worked but it is important to recognize that there are some issues that inherently take
7 longer to resolve than others, such as legacy missing usage and items that require field intervention.
8 The other portion of Dr. Edwards-Greer’s alleged “over 20,000 bill periods” are not backlog items, but
9 instead considered to be “Inflow,” which means they have been newly sent by Calpine in a list in the last
10 month (i.e., since January 2024 for the February 2024 report). Further, not all the “Inflow” numbers on
11 this report are necessarily due to missing usage. SCE’s technical and billing teams must analyze the new
12 “Inflow” list from Calpine to identify the root cause(s) for the issue. The limited snapshot views
13 provided by Dr. Edwards-Greer do not show the shared responsibility of the parties involved in the
14 process for missing usage reconciliation, the details on the root cause of the issues, the assigned entity
15 (SCE or Calpine) to resolve the issues, or the progress made to drive down the overall backlog from
16 November 2023 to February 2024. A more holistic view of data shows that SCE has made substantial
17 progress in reducing the number of CCA accounts with delayed billing due to missing usage,
18 particularly for multiple bill periods. In addition, currently less than 0.40 percent of all CCA customers
19 experience billing delays of more than two billing periods.

20 Mr. Kilgore and Dr. Edwards-Greer argue that SCE’s various communications
21 demonstrate a lack of urgency in resolving the issues or otherwise contribute to a negative customer
22 impact.²⁵⁰ To the contrary, SCE’s communications demonstrate SCE’s proactive and intentional
23 approach to effectively mitigate customer impacts. SCE does not wait for customers to initiate contact
24 but has been instead proactively sending customers, both bundled and unbundled, a letter²⁵¹ when their
25 billing becomes delayed that notifies them of the delayed billing on their account. The letter informs
26 them that the SCE customer service team is aware and working diligently to resolve the delay. In the

²⁴⁹ See Appendix C, Excerpt of SCE’s February 8, 2024 Report on CPA’s Missing Usage Reconciliation.

²⁵⁰ See Ex. CalCCA M. Edwards-Greer, p. 8-9.; Ex. CalCCA C. Kilgore, p. 4, 7. Mr. Kilgore’s testimony references “SCE call center messaging scripts provided by SCE to DCE in Attachment CTK-4” (Ex. CalCCA C. Kilgore, p. 4), however the attachment does not contain call center messaging scripts.

²⁵¹ See Ex. CalCCA C. Kilgore, Attachment CTK-4, “CSRP Delayed Billing Letter – Unassigned Business & Residential” and “CSRP Delayed Billing Letter – Assigned Business.”

1 letter and FAQs, SCE encourages customers experiencing delayed billing to not contact SCE until they
2 receive a bill out of respect for their time to avoid experiencing unnecessary wait times to speak to a call
3 center agent, who will not be able to assist them with a bill inquiry until a bill has been generated.
4 Moreover, these calls (which the CCC would not be able to resolve anyway) could delay other
5 customers from reaching a live agent.

6 CalCCA's other allegations of SCE's inadequate response are also unfounded.²⁵²
7 In particular, it is untrue that "SCE has communicated to [Dr. Edwards-Greer] that it does not have any
8 near-term plans to resolve these billing issues or to modify the logic in its billing system;"²⁵³ SCE denies
9 having made such a statement. While delayed billing will occur in the regular course of business, SCE
10 has in fact implemented various system enhancements and logic changes to the SAP billing system that
11 address CCA billing transactions and has near-term plans to implement additional enhancements. Given
12 that these modifications are non-standard SAP logic, they were and will be thoughtfully assessed for
13 cost effectiveness and feasibility as SCE continues to meet with the CCAs and Calpine to hear their
14 suggestions and input. The system enhancements SCE has improved have been evaluated, prioritized,
15 and implemented by SCE to reduce CCA specific billing exceptions and other usage and billing
16 exceptions.²⁵⁴ For this reason, it is also untrue that "little to no progress to reduce the [billing] errors has
17 been made."²⁵⁵ Moreover, in addition to the regular monthly meetings with all CCAs mentioned by Dr.
18 Edwards-Greer, SCE coordinates daily and weekly billing operations to address billing issues with
19 Calpine. In addition, SCE's technical team has thoroughly presented the technical root causes and details
20 of routine billing exceptions and errors that can occur for CCAs and Calpine. SCE has worked diligently
21 with the CCAs to address their concerns and make strides in reducing exception work.

22 **b) SCE Should Not Be Ordered to Change Its Practices for Reversing and**
23 **Remitting CCA Charges**

24 CalCCA in the testimonies of two witnesses, Mr. Kilgore and Dr. Monique
25 Edwards-Greer, makes several recommendations about SCE's practices for reversing and remitting CCA
26 charges: (1) CalCCA argues the Commission should order SCE to stop its practice of clawing back

²⁵² See Ex. CalCCA C. Kilgore, p. 4; Ex. CalCCA M. Edwards-Greer, pp. 8-10.

²⁵³ Ex. CalCCA M. Edwards-Greer, p. 9.

²⁵⁴ See Appendix A, SCE's response to data request CalCCA-SCE-004, Questions 4.2c and 4.6a.

²⁵⁵ Ex. CalCCA M. Edwards-Greer, p. 10.

1 funds already remitted to CCAs;²⁵⁶ (2) CalCCA argues the Commission should order SCE to re-
2 implement its practice of utilizing additional adjustment codes for any fund reversals;²⁵⁷ (3) CalCCA
3 argues the Commission should order that when SCE resolves a billing issue that results in a reduction of
4 charges originally invoiced, SCE should only reverse from the CCA's deposit the difference between the
5 original payment amount and the new invoice amount; additionally, SCE should not reverse any CCA
6 payments if the corrections are neutral or result in excess charges;²⁵⁸ (4) CalCCA argues that for all
7 payments remitted by SCE to CCAs, the Commission should require SCE to remit all such funds to the
8 relevant CCA with the specific relevant Contract Account and POD ID details for each transaction;²⁵⁹
9 (5) CalCCA argues the Commission should order SCE to modify the logic in its new billing system to
10 eliminate the transmission of shadow credits to CCAs for customers on SCE's Budget Billing Plan
11 (BBP);²⁶⁰ and (6) CalCCA argues the Commission should order SCE to immediately resolve all
12 accounts in its legacy billing system.²⁶¹

13 As an initial matter, SCE provides the following background regarding the CCA
14 remittance process, and the SAP billing processes that take place during an account correction.
15 Each CCA has a billing supplier account in SCE's system. As SCE receives CCA customer payments
16 throughout any given day, amounts are credited to the CCA's account, and at the end of each day the
17 cumulative credit amount in the CCA's supplier account gets remitted to the CCA. When a billing
18 correction is needed to a CCA account, as an initial step SCE must reverse all billing and CCA customer
19 payments going back to the date for which the bill correction is needed.²⁶² The total amount of reversed
20 CCA payments that were previously remitted are debited to the CCA's billing supplier account in SCE's
21 system. This reduces the overall CCA daily customer payment remittance by the total amount of
22 customer payments being held during reversal activities. During the billing correction period, SCE
23 performs necessary account billing corrections, and then sends updated billed usage or billing
24 determinant files to Calpine. Calpine's billing system and support staff then review corrected files and

²⁵⁶ Ex. CalCCA M. Edwards-Greer, p. ii.

²⁵⁷ Ex. CalCCA M. Edwards-Greer, p. ii.

²⁵⁸ Ex. CalCCA M. Edwards-Greer, p. ii.

²⁵⁹ Ex. CalCCA M. Edwards-Greer, p. ii.

²⁶⁰ Ex. CalCCA M. Edwards-Greer, p. 42.

²⁶¹ Ex. CalCCA M. Edwards-Greer, p. 42.

²⁶² See Appendix A, SCE's data request response to CalCCA-SCE-005, Question 5.4.

1 send back updated CCA charges based on new usage or billing determinants sent to them by SCE.
2 SCE must hold on completing invoicing on the corrected account(s) until the CCA sends re-stated
3 charges for the billing period in question. When the account correction is complete, SCE credits the
4 CCA's billing supplier account in SCE's system once the corrected bill is finalized.

5 With respect to CalCCA's recommendation (1), Dr. Edwards-Greer uses the term
6 "clawback" or "clawing back funds already remitted to CCAs" to refer to SCE's debiting of the CCA
7 account during the account correction process. Dr. Edwards-Greer argues the Commission should order
8 SCE to stop this practice, because it delays delivery of funds to CCAs, and SCE should "bear the
9 financial burden of its billing errors during the course of its account correction process."²⁶³ First, as
10 explained above, it is incorrect to characterize account billing corrections as "SCE's billing errors."
11 Account billing corrections can and will occur during the normal course of business due to customer
12 driven requests or metering errors. Moreover, making account corrections and rebilling customers is a
13 joint effort between SCE and the CCAs. CCAs and Calpine must provide SCE with the corrected CCA
14 charges during the billing correction process. The CCAs have operational and financial control of their
15 CCA back-office vendor processes and resources. SCE will credit reversed payments back to the CCAs
16 as soon as Calpine sends back the corrected charges for the period in question. SCE acknowledges that
17 an account correction can be "lengthy," and account corrections spanning multiple bill periods can result
18 in an impact to the customer's experience. That is why SCE has worked diligently to reduce the number
19 of delayed bills as explained above. SCE is also sympathetic to the customer impact of receiving a large
20 new bill; however, that is consistent with the Commission's approved billing format and the requirement
21 that bills contain sufficient detail for the customer to recalculate the bill for accuracy.²⁶⁴

22 With respect to CalCCA's recommendations (1)-(4),²⁶⁵ although SCE does not
23 concede that changes are warranted and does not commit to implementing any change, any proposed
24 changes to the system or reporting solutions must consider technical feasibility, operational capabilities,

²⁶³ Ex. CalCCA M. Edwards-Greer, p. ii.

²⁶⁴ See Cal. Pub. Util. Code § 394.4(e); see also Cal. Pub. Util. Code § 392.

²⁶⁵ SCE understands recommendations (1) and (3) to be effectively making the same request.

1 customer affordability, and regulatory requirements.²⁶⁶ Regarding recommendation (3), SAP
2 functionality requires reversal of all invoices so that the system can generate a detailed billing document
3 with all corrections, consistent with SCE’s bill presentment requirements. This system required reversal
4 of invoices is what automatically triggers reversal of the remitted CCA customer payments tied to those
5 charges. Regarding recommendations (2) and (4), SCE understands CalCCA’s concerns underlying its
6 request for more customer account details for both reversals and remittances. At present, SCE and CCAs
7 must communicate manually to obtain account information and reasons for account corrections. It is
8 important to note that the current manual reporting processes are due to differences in account set-up
9 from SAP and the legacy billing system, and the processes were shared in detailed meetings with
10 Calpine prior to SAP implementation in April 2021.

11 Regarding recommendation (5), CalCCA claims that “SCE’s system sends CCAs
12 inaccurate credit amounts for BBP accounts, commonly referred to as ‘shadow credits.’”²⁶⁷ After CCAs
13 initially raised this concern, SCE investigated and instructed impacted CCAs on how to account for this
14 issue in their monthly remittance reconciliations. Moreover, it is important to note that the issue had no
15 customer-facing impacts. The credits and debits were not visible to the customer, only to the CCA.
16 In March 2023, SCE implemented a system logic change that stopped issuance of these inaccurate
17 credits and debits moving forward. The system would also execute corrections to existing inaccurate
18 credits and debits at each impacted BBP account’s next settlement date. Because BBP accounts are on
19 12-month cycles, the next settlement following the logic change could have been as late as March 2024.
20 However, by this point (April 2024), SCE understands the issue is fully resolved. To the best of SCE’s
21 knowledge, no CCA has brought up similar issues with BBP accounts in either SCE’s regular monthly
22 operational meetings with CCAs or SCE’s weekly meetings with Calpine.

23 Finally, with respect to recommendation (6), CalCCA demands immediate
24 “resolution” of all accounts in SCE’s legacy system. It is unclear what CalCCA intends with such a
25 broad, sweeping request that appears duplicative of many points they have already made. There are
26 various issues that can arise with accounts in SCE’s legacy billing system, such as in connection with

²⁶⁶ CalCCA points to PG&E’s different practice, whereby SCE does not withdraw any payment already provided to the CCA associated with the bill and that if a billing correction is warranted past the payment date, the payment remains on the CCA service agreement. *See* Ex. CalCCA M. Edwards-Greer, p. 38. However, SCE understands PG&E to use a different billing system. SCE’s billing system cannot currently accommodate any of the changes CalCCA proposes.

²⁶⁷ Ex. CalCCA M. Edwards-Greer, p. 41. SCE understands the issue to involve both credits and debits.

1 missing usage (discussed above in section V.A.2.a)) and providing relevant customer account details
2 from migrated charges and balance transfers during reversal or remittance (discussed above as CalCCA
3 recommendations (2) and (4) in this section). As explained above, resolving these issues is not
4 “immediate” and requires complex, labor-intensive processes and/or system enhancements; SCE is
5 committed to continuing to work diligently with CCAs on these efforts.

6 c) **CalCCA’s Proposals for SCE’s Rule 17 Should be Rejected**

7 CalCCA in the testimonies of two witnesses, Mr. Fulmer and Dr. Edwards-Greer,
8 recommends that the Commission order SCE to apply the backbilling limitations of SCE’s Tariff Rule
9 17 equally to all customers – bundled and unbundled service alike – but it proposes through competing
10 proposals very “unequal” treatment of the undercollections of the revenue requirements that would
11 result for load-serving entities (LSEs) whose charges are included on SCE’s bill:

- 12 • Mr. Fulmer proposes that SCE’s shareholders should fund the resulting
13 undercollections for each non-investor-owned utility (non-IOU) LSE;²⁶⁸ or
14 alternatively that SCE’s distribution customers should fund the resulting
15 undercollections of each non-IOU LSE.²⁶⁹ Mr. Fulmer claims that either
16 option would treat bundled and unbundled customers “equally,” which is
17 incorrect for reasons discussed below.
- 18 • Dr. Edwards-Greer proposes that SCE should be “consistent” with PG&E in
19 its approach to Rule 17 backbilling limitations,²⁷⁰ but then proposes that
20 SCE’s shareholders should fund all the resulting undercollections of all LSEs,
21 including SCE for its authorized revenue requirements,²⁷¹ which goes well
22 beyond what PG&E does and is unreasonable, inconsistent with cost-of-
23 service ratemaking principles, and in material tension with longstanding black
24 letter law, for reasons discussed below.
- 25 • Neither witness addresses resulting overcollections.

²⁶⁸ See Ex. CalCCA M. Fulmer, p. 45-46.

²⁶⁹ See Ex. CalCCA M. Fulmer, p. 46.

²⁷⁰ See Ex. CalCCA M. Edwards-Greer, p. 39.

²⁷¹ See Ex. CalCCA M. Edwards-Greer, pp. 11-28.

1 The testimonies of Mr. Fulmer²⁷² and Dr. Monique Edwards-Greer²⁷³ do not
2 accurately describe SCE's implementation of its Rule 17. First, the testimonies incorrectly claim that
3 SCE does not apply Rule 17 to unbundled service customers' bills.²⁷⁴ To the contrary, when SCE
4 identifies an error in a customer's bill – whether the customer is bundled service or unbundled service –
5 SCE corrects that error, which is what SCE's Rule 17 fundamentally requires.²⁷⁵ SCE applies Rule 17 to
6 the generation and transmission/distribution (T&D) portions of bills for both bundled and unbundled
7 service customers in correcting identified errors.

8 Second, the testimonies state that SCE declines to apply Rule 17's limitations for
9 backbilling to the generation portion of unbundled service customers' bills and this is inaccurate by way
10 of omission.²⁷⁶ What the testimonies omit is that SCE does not apply Rule 17's limitations on
11 backbilling to the generation portion of an unbundled service customer's bill absent the consent of the
12 non-IOU LSE, i.e., the CCA, Community Aggregator (CA), and Electric Service Provider (ESP) if SCE
13 is the billing agent for the ESP. Those limitations permit backbilling up to three years to correct
14 overcharges for all customers, up to three months for undercharges for residential and Small Business
15 Customers, and up to three years for undercharges for all other customers.²⁷⁷ With the LSE's consent,
16 SCE applies Rule 17's limitations to the LSE's portion of the bill: the generation portion. When the LSE
17 declines to consent, SCE does not apply the Rule 17 limitations to the generation portion in adjusting a

²⁷² See Ex. CalCCA M. Fulmer, pp. 37-46.

²⁷³ See Ex. CalCCA M. Edwards-Greer, pp. 11-28.

²⁷⁴ See Ex. CalCCA M. Edwards-Greer, p. 11 (stating “[i]n these scenarios, Rule 17 is applied to SCE charges but is not applied to the CCA charges.”).

²⁷⁵ See SCE's Tariff Rule 17, *Adjustment of Bills and Meter Tests*, which governs bill adjustments for Billing Errors and Meter Errors, available at <https://www.sce.com/regulatory/tariff-books>.

²⁷⁶ See Ex. CalCCA M. Fulmer, p. 39 (stating “For CCA customers, SCE's practice has been to apply the Rule 17 backbill limits only on transmission and distribution charges, not generation charges.”).

²⁷⁷ SCE's Tariff Rule 17, Section D, states “Where SCE overcharges or undercharges a customer as the result of a Billing Error, SCE may render an adjusted bill for the amount of the undercharge, and shall issue a refund or credit to the customer for the amount of the overcharge for the period of the Billing Error, but not exceeding three years in the case of an overcharge for all service accounts, and, in the case of an undercharge, not exceeding three months for residential service to a SCE-metered Single-Family Dwelling or Accommodation as defined in Rule 1, Definitions, not exceeding three months for a Small Business Customer, as defined in Rule 1 Definitions (or for a customer who certifies that it meets the California Government Code Section 14837 definition of ‘Micro-Business’); and not exceeding three years for all other service.” The same rules apply to Meter Errors, whereby Fast Meters result in overcharges and Slow Meters and Nonregistering Meters result in undercharges. See SCE's Tariff Rule 17, Sections C. 1, 2. 3.

1 CCA service customer's bill to correct an error. This has been SCE's longstanding practice under its
2 Commission-approved Rule 17.

3 The table below demonstrates how SCE's Rule 17 operates when the LSE does
4 give its consent for SCE to apply the Rule's bill-adjustment limitation (i.e., bundled and unbundled
5 service customers are treated the same) and when the LSE declines or fails to consent to SCE applying
6 the Rule's bill-adjustment limitation (i.e., bundled and unbundled service customers are treated
7 differently on the generation portion of the bill only because the LSE did not consent).

**Table VI-18
Rule 17 Scenarios**

SCE's Rule 17	Residential / Small Business <u>with</u> LSE's Consent	All Other Customers <u>with</u> LSE's Consent	Residential / Small Business <u>without</u> LSE's Consent	All Other Customers <u>without</u> LSE's Consent
Generation Portion	<ul style="list-style-type: none"> • Overcharges from Billing or Meter errors corrected for up to 36 months • Undercharges from Billing or Meter errors corrected for up to 3 months 	<ul style="list-style-type: none"> • Overcharges from Billing or Meter errors corrected for up to 36 months • Undercharges from Billing or Meter errors corrected for up to 36 months 	<p><u>Bundled Service:</u></p> <ul style="list-style-type: none"> • Overcharges from Billing or Meter errors corrected for up to 36 months • Undercharges from Billing or Meter errors corrected for up to 3 months <p><u>Unbundled Service:</u></p> <ul style="list-style-type: none"> • Overcharges from Billing or Meter errors corrected without limitation • Undercharges from Billing or Meter errors corrected without limitation 	<p><u>Bundled Service:</u></p> <ul style="list-style-type: none"> • Overcharges from Billing or Meter errors corrected for up to 36 months • Undercharges from Billing or Meter errors corrected for up to 36 months <p><u>Unbundled Service:</u></p> <ul style="list-style-type: none"> • Overcharges from Billing or Meter errors corrected without limitation • Undercharges from Billing or Meter errors corrected without limitation
T&D Portions	<ul style="list-style-type: none"> • Overcharges from Billing or Meter errors corrected for up to 36 months • Undercharges from Billing or Meter errors corrected for up to 3 months 	<ul style="list-style-type: none"> • Overcharges from Billing or Meter errors corrected for up to 36 months • Undercharges from Billing or Meter errors corrected for up to 36 months 	<ul style="list-style-type: none"> • Overcharges from Billing or Meter errors corrected for up to 36 months • Undercharges from Billing or Meter errors corrected for up to 3 months 	<ul style="list-style-type: none"> • Overcharges from Billing or Meter errors corrected for up to 36 months • Undercharges from Billing or Meter errors corrected for up to 36 months

1 SCE requires the responsible LSE to authorize the application of Rule 17's
2 limitations for backbilling to the generation portion of the bill for error corrections because that portion
3 of the bill does not recover SCE's revenue; instead it recovers the revenue of the responsible LSE.

1 The responsible LSE provides generation services to the impacted customer, not SCE. SCE does not
2 believe it has the authority to limit the responsible LSE’s recovery of its revenue from the correct billing
3 of its generation charges absent the consent of that LSE. SCE understands that even the Commission
4 lacks authority over the ratemaking of non-IOU LSEs. Indeed, Rule 23 makes clear that SCE is not
5 liable for CCA service by stating “[i]f a customer receives service from a CCA, SCE has no obligations
6 to the customer with respect to the services provided by the CCA. The customer must look to the CCA
7 to carry out the responsibilities associated with that service.”²⁷⁸ Therefore, the responsible LSE must
8 authorize SCE to apply the limits on its recovery of its revenue from the correct billing of its generation
9 charges (if it so wishes).

10 The Commission has explained the Rule 17 backbilling limitations as follows:
11 “[W]hat utilities such as SCE have done, with the sanction of this Commission, is to place a limit on a
12 ratepayers’ right to recovery to up to three years in cases of overcharges, and to place a limit on a
13 utility’s right to recover undercharges.”²⁷⁹ The Commission can sanction this regulatory compact for
14 investor-owned utilities (IOUs) in Rule 17 because it has broad authority over the IOUs, including for
15 ratemaking pursuant to Cal. Pub. Util. Code § 451. However, it is unclear whether the Commission –
16 and hence SCE through its Rule 17 – can place a limit on a non-IOU LSE’s right to recover
17 undercharges and a limit on the LSE’s obligation to credit in cases of overcharges. But there is no
18 question the non-IOU LSEs can authorize SCE to apply this treatment (if they so wish).

19 When an LSE consents to the application of SCE’s Rule 17’s backbilling
20 limitations to the generation portion of the bill for error corrections, the LSE may – like SCE –
21 experience an under- or over-collection of its revenue requirement (i.e., its cost of generation service).
22 In which case, presumably the LSE will need to adjust its rates prospectively – just as SCE does albeit
23 with Commission oversight and approval – to ensure it recovers no more and no less than its revenue
24 requirement through its rates. Prospective adjustments to rates to recover revenue requirements should
25 be commonplace for LSEs because LSEs cannot perfectly forecast circumstances in any given year that
26 impact the recovery of their revenue requirements, including their customers’ actual demand and
27 consumption; weather; the production of LSE-owned or -contracted generation facilities; generation fuel
28 costs; revenues earned by generation resources bid into the CAISO market; and revenues from

²⁷⁸ SCE’s Tariff Rule 23, Section B.6.

²⁷⁹ See D.12-08-031, DCOR LLC v. Southern California Edison Company, issued August 23, 2012 in C.12-02-012, p. 15 (emphasis added).

1 customers' payment of bills. SCE accounts for these uncertainties through forecasted and trued-up rates
2 in Commission-authorized balancing accounts and adjusts its rates at least annually to recover its
3 authorized revenue requirements.²⁸⁰ Non-IOU LSEs govern their own ratemaking processes but
4 presumably by necessity must also account for these same uncertainties to ensure they recover their
5 revenue requirements.

6 Because CCAs (like other LSEs) have the right to authorize SCE to apply Rule
7 17's backbilling limitations to their portion of the bill when SCE adjusts for errors, they have no basis
8 for complaining that SCE does not do so when the CCAs fail to authorize SCE to do so. Put simply, the
9 CCAs can solve the very problem they complain of in this case by authorizing SCE to apply Rule 17's
10 limitations for backbilling to their portion of the bill.

11 The Commission should carefully consider why the CCAs are unwilling to solve a
12 very simple issue by giving SCE authorization to make Rule 17's limitations on backbilling symmetrical
13 to bundled and unbundled service customers. When considering the recommendations of Mr. Fulmer
14 and Dr. Edwards-Greer in their totality, that reason becomes apparent: the CCAs would have SCE's
15 shareholders or distribution customers shoulder the undercollection responsibility of applying SCE's
16 Rule 17 backbilling limitations to their generation charges. In this regard, CalCCA's stated motivation –
17 to ensure that bundled and unbundled customers are treated “equally”²⁸¹ – is belied by its urged
18 outcome(s), which would treat bundled and unbundled service customers very differently by giving
19 undue preference to unbundled service customers.²⁸² This undue preference would occur if the
20 Commission ordered SCE to apply the Rule 17 backbilling limitations to unbundled service customer
21 bills and treat any resulting undercollection as an unrecoverable “loss” for the LSE that SCE's

²⁸⁰ See, e.g., Cal. Pub. Util. Code 454.5(d)(3) (requiring timely recovery of an investor-owned utility's prospective procurement costs incurred pursuant to an approved procurement plan, rates based on forecasts of procurement costs adopted by the commission, actual procurement costs incurred, or a combination thereof, % power procurement balancing accounts to track the differences between recorded revenues and costs incurred pursuant to an approved procurement plan, and regular review and adjustment of rates to amortize a balancing account).

²⁸¹ See Ex. CalCCA M. Edwards-Greer, p. 28 (stating “all SCE customers should receive the same protection under Rule 17” and “SCE should be required to treat bundled and unbundled customers equally in its Rule 17 backbilling practices. . . .”); see also Ex. CalCCA M. Fulmer, p. 45.

²⁸² See Ex. CalCCA M. Fulmer, p. 46 (proposing “SCE should recover charges on behalf of third parties via a shareholder-funded adjustment.”). Note that CalCCA's other witness, Dr. Edwards-Greer, makes a different proposal. See CalCCA M. Edwards-Greer, p. 28 (emphasis in original) (stating “the Commission should order SCE to . . . bear the costs beyond those backbilling limitations for *all* its customers, including CCA customers.”). So it is unclear exactly what CalCCA's proposal is.

1 shareholders or customers must fund, rather than considering it an undercollection of the LSE's cost of
2 generation service (i.e., revenue requirement) that can be rolled into the LSE's rate adjustments and
3 recovered from the LSE's generation customers as a cost of service. The latter is how the costs of
4 applying SCE's Rule 17 backbilling limitations to SCE's generation and T&D charges on customers'
5 bills are treated: resulting under- or over-collections are rolled into SCE's rate adjustments and
6 recovered from SCE's bundled service customers because they are costs of SCE's generation and T&D
7 services.

8 In forthcoming legal briefing, SCE will discuss why the CalCCA's proposal is
9 directly contradictory to the very statutes that establish the existence and guide the jurisdictional
10 authority of non-IOU LSEs.²⁸³ But from a simple, logical fairness standpoint, the only reasonable way
11 the Commission can require SCE to apply the Rule 17 backbilling limitations to unbundled service
12 customer bills and treat bundled and unbundled service customers the same is to consider the resulting
13 under- and over-collections of the LSE as a cost of service recoverable from the LSE's customers.²⁸⁴

14 Ordering SCE to apply the Rule 17 backbilling limitations to unbundled service
15 customer bills and treat any resulting undercollections as unrecoverable "losses" for the LSEs that
16 SCE's distribution customers or its shareholders must fund would be tantamount to awarding LSEs
17 damages for billing errors, which would be inappropriate in cases of routine billing errors.
18 The Commission has declined to require utility or shareholder liability for routine billing errors, much
19 less the ongoing, open-ended liability for such routine errors CalCCA proposes. To the contrary, Rule 17

²⁸³ Alternatively, ordering SCE to apply the Rule 17 backbilling limitations to unbundled service customer bills and treat any resulting undercollections as unrecoverable "losses" for the LSEs that SCE's bundled service customers must fund – through distribution rates or otherwise – would cause shifting contrary to California law because it would require bundled service customers to pay for costs of CCA, CA and Direct Access service. Requiring the customers of one LSE to pay for costs incurred on behalf of another LSE's customers would cause unlawful cost-shifting. *See, e.g.*, Cal. Pub. Util. Code § 366.3 (stating "[b]undled retail customers of an electrical corporation shall not experience any cost increase as a result of the implementation of a community choice aggregator program. The commission shall also ensure that departing load does not experience any cost increases as a result of an allocation of costs that were not incurred on behalf of the departing load."); *see also* Cal. Pub. Util. Code § 365.2 ("The commission shall ensure that bundled retail customers of an electrical corporation do not experience any cost increases as a result of retail customers of an electrical corporation electing to receive service from other providers. The commission shall also ensure that departing load does not experience any cost increases as a result of an allocation of costs that were not incurred on behalf of the departing load.").

²⁸⁴ As discussed above, non-IOU LSEs have the authority to set their own rates to recover their costs of service in their rates.

1 exists to allow the utility to fix routine billing errors without liability. Moreover, the Commission has
2 consistently found that it has no authority to award damages.²⁸⁵

3 Mr. Fulmer implies that SCE’s longstanding practice under its Rule 17 violates
4 Cal. Pub. Util. Code § 532,²⁸⁶ which addresses utilities charging rates or receiving compensation or
5 giving refunds that are different from their authorized rates schedules. Mr. Fulmer is incorrect because
6 SCE has not, under its Rule 17 or otherwise, charged rates or recovered compensation or given refunds
7 different from its authorized rate schedules. In fact, the non-IOU LSE generation portion of SCE’s bill
8 does not charge any SCE rate or recover any SCE compensation or provide a refund of any SCE charge.
9 Mr. Fulmer testifies that shareholder responsibility is appropriate for “costs due to tariff violations;”²⁸⁷
10 however, SCE has not violated any tariff. SCE’s longstanding practice has been to only apply Rule 17
11 backbilling limitations to a non-IOU LSE’s generation portion of the bill with the LSE’s consent, and
12 this longstanding practice is effectively part of its tariff rule.

13 Contrary to Mr. Fulmer’s assertions, it is actually CalCCA’s proposals that would
14 run afoul SCE’s Rule 23. Rule 23 makes clear that any adjustment of correctly billed CCA charges is a
15 decision that belongs to the CCAs. It provides that the CCA “shall send its customer billing information
16 to SCE,” and SCE “shall include CCA charges on the bill,” leaving no room for SCE to adjust correctly
17 billed CCA charges unilaterally.²⁸⁸ For that reason, “[c]ustomer disputes of CCA charges must be
18 directed to the CCA.”²⁸⁹ The rule further clarifies that SCE is obligated to “remit payments to the CCA
19 *only for the amounts paid by the CCA customer* for payment of CCA charges.”²⁹⁰

20 That PG&E has an internal policy under its Rule 17 whereby it elects to provide a
21 shareholder-funded adjustment (which PG&E call a “Customer Satisfaction Adjustment”) to LSEs²⁹¹ is
22 insufficient grounds to order SCE to do so. First, it is unclear whether PG&E sought and obtained
23 Commission approval to implement the policy. If not, the policy cannot be part of PG&E’s

²⁸⁵ See D.13-02-036 (Order Denying Rehearing of D.12-08-031 *in re* DCOR LLC v. SCE), p. 6 (stating “[d]amages are different from refunds . . . The awarding of damages involves the superior court’s jurisdiction, while refunds for billing errors are within the exclusive jurisdiction of the Commission.”).

²⁸⁶ See Ex. CalCCA M. Fulmer, p. 40.

²⁸⁷ See Ex. CalCCA M. Fulmer, p. 44.

²⁸⁸ See SCE’s Rule 23, Section P.1.

²⁸⁹ See SCE’s Rule 23, Section Q.7.

²⁹⁰ See SCE’s Rule 23, Section Q.3. (emphasis added).

²⁹¹ See Appendix A, PG&E’s response to data request CalCCA_002-Q002, subpart c.

1 Commission-approved Electric Tariff Rule 17 and therefore PG&E is implementing its policy outside of
2 its Rule 17. Second, PG&E concedes that its policy arose in approximately 2003 “to overcome limited
3 functionality in its customer care and billing (CC&B) system and the electronic data interface (EDI)
4 used to communicate usage, billing, and customer information to third parties (initially direct access and
5 core transport agents, and later community choice aggregators). These parties could not be provided
6 pertinent calculation details through the EDI process to validate any customer credits issued.”²⁹²
7 Therefore, it appears that PG&E elected to implement this policy to avoid complaints about its limited
8 billing functionality. SCE views this as a form of shareholder-funded settlement that PG&E may be free
9 to offer but that is not binding on SCE and should not be required of SCE.

10 Moreover, CalCCA’s proposal for SCE in this case goes well beyond PG&E’s
11 approach. CalCCA asks the Commission to require SCE or its shareholders to be liable for all LSE
12 undercollections resulting from the application of Rule 17’s backbilling limitations, including for
13 undercollections impacting SCE’s generation and T&D revenue requirements.²⁹³ PG&E’s shareholders
14 fund undercollections for third parties; they do not assume liability for undercollections of PG&E’s own
15 revenue requirements resulting from Rule 17’s backbilling limitations. Rather, like SCE, PG&E
16 recovers undercollections (or accounts for overcollections, as the case may be) of PG&E’s revenue
17 requirements “through PG&E’s annual true-up filings.”²⁹⁴

18 Therefore, the CCAs’ proposals regarding SCE’s Rule 17 should be rejected.
19 If the Commission determines that SCE’s Rule 17 backbilling limitations should apply to LSEs’
20 generation charges on unbundled service customer bills, the Commission should ensure that bundled and
21 unbundled service customers are treated the same by expressly finding that resulting under- and over-
22 collections of an LSE’s generation revenue requirements are costs of service recoverable from the LSE’s
23 customers and that non-IOU LSEs have full authority to set their own rates to recover their costs of
24 service. To the extent the Commission seeks to examine consistency across the IOUs on applying Rule
25 17’s backbilling limitations to error adjustments, it should do so in a rulemaking proceeding that
26 includes the participation of all electric IOUs. Phase 1 of an SCE’s General Rate Case is not the

²⁹² See Appendix A, PG&E’s response to data request CalCCA_001-Q001_SUPP01, subpart c.

²⁹³ See Ex. CalCCA M. Edwards-Greer, p. 28 (emphasis in original) (stating “the Commission should order SCE to (1) apply the Rule 17 backbilling limitations to *all* its customers’ charges, including CCA customers’ generation charges, and (2) bear the costs beyond those backbilling limitations for *all* its customers, including CCA customers.”).

²⁹⁴ See Appendix A, PG&E’s response to data request CalCCA_001-Q001-SUPP01, subpart a.

1 appropriate forum for evaluating or addressing consistency of tariff rule implementation across the
2 electric IOUs.

3 **3. Conclusion**

4 SCE has already made significant improvements in its overall billing performance for all
5 its customers. SCE also remains committed to collaborating with CCAs in the joint effort of making
6 account corrections and rebilling customers, particularly given that account billing corrections can and
7 will continue to occur in the normal course of business. SCE understands CalCCA's desire for changes
8 to the current account correction process with respect to reversals and remittance. However, SCE must
9 carefully consider the financial implications of these changes, including whether they may be cost-
10 effective (i.e., whether there is business value in relation to costs) or whether they may adversely impact
11 all customers who must bear the burden of a cost that benefits only CCA customers. The Commission
12 should not order SCE to implement CalCCA's recommended changes. Finally, CalCCA's complaints
13 that SCE fails to apply Rule 17's backbilling limitations to CCA charges ignores that CCAs who want
14 this application need only authorize SCE to do so. Moreover, contrary to CalCCA's stated motivation of
15 "equal" treatment between bundled and unbundled service customers, CalCCA's proposal would result
16 in very unequal treatment by giving undue preference to unbundled service customers. CalCCA's
17 recommendations regarding SCE's Rule 17 should be rejected.

Appendix A

Customer Service Operations Data Request Responses

**SCE-14, Vol. 01: Rebuttal Testimony on Customer Service Operations
Appendix A Index of Data Request Responses**

DATA REQUEST	PAGE(S)
PAO-SCE-Verbal-002 (attachments omitted)	A1
TURN-SCE-095, Q6	A2
PubAdv-SCE-194-MCL, Q5a	A3-A4
Supplemental PubAdv-SCE-194-MCL, Q4b	A5-A6
CalCCA-SCE-004, Q4.4	A7-A9
CalCCA-SCE-004, Q4.6	A10-A16
CalCCA-SCE-003, Q3.14	A17
CalCCA-SCE-006, Q6.1a	A18
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CalCCA-SCE-003, Qs 3.6-3.10	A21-A25
CalCCA-SCE-004, Q4.2a	A26-A28
CalCCA-SCE-004, Q4.3	A29-A30
PG&E: CalCCA_002-Q002	A31-A32
PG&E: CalCCA_001-SUPP01	A33-A35
CalCCA-SCE-005, Q5.4	A36

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET P A O - S C E - V e r b a l - 0 0 2

To: Public Advocates Office
Prepared by: Aquanetta Hardy
Job Title: Rates, Sr. Advisor
Received Date: 6/23/2023

Response Date: 6/26/2023

Question 01:

Please provide working spreadsheets supporting the testimony and workpapers

Response to Question 01:

Please see the attached excel version of supplemental workpapers by exhibit and volume which aligns with the supplemental workpapers that were published on SCE’s CPUC Open Proceeding website on May 12, 2023. Please click below for a direct link to the corresponding workpapers.

https://edisonintl.sharepoint.com/:f:/t/Public/regpublic/EjXd1htSjy5Evi_Xm4K6C8QBNooT_dbMv4ydtQ10aOj3UA

Please note that the following Excel documents are confidential pursuant to the attached confidentiality declaration.

#	Exhibit	Confidential Workpaper Name	Confidential Declaration
1	SCE-2, V.02	Forecast for Distribution Transformers (Confidential).xlsx	Declaration of Russell Ragsdale, Dated 4/26/2023
2	SCE-2, V.10	WPSCE02VOL10_ForecastOM_WP_DeadAndDyingTreeRmvl_CONFIDENTIAL.xlsx	Declaration of Terry Ohanian, Dated 5/03/2023
3	SCE-2, V.10	WPSCE02VOL10_ForecastOM_WP_HTMP_CONFIDENTIAL.xlsx	Declaration of Terry Ohanian, Dated 5/03/2023
4	SCE-2, V.10	WPSCE02VOL10_ForecastOM_WP_RoutineLineClearing_CONFIDENTIAL.xlsx	Declaration of Terry Ohanian, Dated 5/03/2023
5	SCE-2, V.10	WPSCE02VOL10_ForecastOM_WP_SeasonalPatrolsAOCEmergentWork_CONFIDENTIAL.xlsx	Declaration of Terry Ohanian, Dated 5/03/2023
6	SCE-5, V.01	CONFIDENTIAL WP_SCE-5_Vol_1 BCRs.xlsm	Declaration of Christine Fanous, Dated 4/19/2023
7	SCE-5, V.01	CONFIDENTIAL WP_SCE-05_Vol_1 SCE Forecasted REC Prices - CONFIDENTIAL.xlsx	Declaration of Christine Fanous, Dated 4/19/2023
8	SCE-5, V.01	CONFIDENTIAL WP_SCE-05_Vol_1 Solar Rooftop Leases Itemized Forecast.xlsx	Declaration of Christine Fanous, Dated 4/19/2023
9	SCE-7, V.02	12. Fuel & Purchased Power _Workpapers (Confidential).xlsx	Declaration of Alan Varvis, Dated 5/05/2023

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET TURN - SCE - 095

To: TURN
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 2/8/2024

Response Date: 2/22/2024

Question 06.a-c:

Page 83 of SCE03V01 states that “In May 2023, SCE began implementing this increase with an 8.4 percent increase relative to 2022 wages.”

- a. Please explain whether SCE increased the ENA wages from May 2023 to January 2024, and if yes, what percent.
- b. Please explain how many additional wage increases SCE plans to implement from now until end of 2025 and the percentage of each increase.
- c. Please provide the timing of the planned increases described in part b. above.

Response to Question 06.a-c:

- a. Yes, as indicated in Ex. SCE-03 Vol. 01 p. 83, SCE increased Energy Advisors’ (ENA) wages by a weighted average increase of 8.4% effective May 2023. SCE did not implement any other categorical ENA wage increases from May 2023 to January 2024; ENAs may have received wage increases on an individual basis.
- b. SCE plans to implement two wage increases from now until the end of 2025 by the percentages (which reflect weighted average increases) shown in the table below.

Year	Increase (%)
2024	9.4%
2025	8.6%

- c. SCE is still determining the specific timing for each of the wage increases.

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET P u b A d v - S C E - 1 9 4 - M C L

To: Public Advocates Office
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 9/28/2023

Response Date: 10/10/2023

Question 05.a-f:

"Referring to Ex. SCE-03-WP, Vol. 1, pp. 90–94. SCE recorded \$0 in 2018-2022 for its residential paper bill fee. Provide the following:

- a. Provide the cost benefit analysis or study performed that SCE’s management relied upon to determine a new paper bill fee for residential and non-residential customers is needed. If a cost benefit analysis or study was not performed, state why.
- b. Provide the date and year SCE implemented and adopted e-billing. Identify the paper bill fee that SCE charged prior to its e-billing adoption.
- c. Provide documentation that specifically calculates the paper bill fee prior to SCE’s e-billing adoption and shows how the paper bill fee was assessed.
- d. SCE forecasts a total of \$7.668 million for the paper bill fee in 2023. Provide the 2023 actual cost as of August 2023.
- e. Provide the labor and non-labor cost associated with the implementation of the paper bill fee for TY 2025.
- f. Provide in Excel format (with active cells, data sources, formulas, and links) all tables included in p.94."

Response to Question 05.a-f:

a) There was no cost benefit analysis performed. As Exhibit SCE-03, Volume 1, p. 123 explains, the main purpose of the paper bill fee is to direct the costs associated with the delivery of a paper billing statement to only the customers who continue to receive paper bills (excluding CARE/FERA customers). Exhibit SCE-03, Volume 1, p. 124 further explains that as postage and materials costs continue to increase, a paper bill fee will prevent these cost pressures from being incongruously incurred by customers who have opted for e-billing. Also as explained in testimony, one potential benefit could be that a paper bill fee may encourage increased e-billing adoption (a low-cost bill delivery method), which would result in lower overall customer costs in the future.

b) SCE has implemented various forms of e-billing historically. In Advice Letter 1118-E dated September 26, 1995, SCE requested to provide “electronic billing” through Electronic Data Interchange (EDI). This form of electronic billing is currently still available; however, it is only used by a small number of large commercial customers. SCE commenced offering Internet Billing and Payment (IBP) to employees in March 2000 and to customers in June 2000. Since April 2002 SCE has offered IBP through its own website, SCE.com. In Advice Letter 1446-E, SCE requested authority to initiate Format IBP for transmitting bills electronically, allowing electronic payment of bills, and eliminating the hard copy of the bill for customers who choose electronic billing. This

advice letter was approved by Resolution E-3711 dated August 21, 2003.

SCE has never before charged a paper bill fee; the proposed paper bill fee in Exhibit SCE-03, Volume 1 would be a new fee, to take effect beginning in 2025.

c) SCE has never before charged a paper bill fee; the proposed paper bill fee in Exhibit SCE-03, Volume 1 would be a new fee, to take effect beginning in 2025.

d) SCE does not have final, adjusted recorded cost data available for 2023. SCE will provide preliminary 2023 recorded data to parties once that data is final and appropriately adjusted for accuracy, which is anticipated in March 2024. This is consistent with the September 5, 2023 Assigned Commissioner's Scoping Memo which is excerpted below.

"SCE supports providing 2023 recorded data in this proceeding but requests a due date of March 11, 2024. SCE states that the 2023 data is not available until mid-February 2024 and that SCE requires some additional time to review, analyze, and adjust the data to ensure accuracy. SCE's proposed due date is reasonable and will still allow for the timely consideration of the 2023 recorded data in this proceeding. Therefore, SCE's proposed due date is adopted and incorporated into the proceeding schedule." September 5, 2023 Assigned Commissioner's Scoping Memo and Ruling at p. 9 (internal citations omitted).

e) SCE estimates IT capital implementation costs to be \$490,000 during the 2025 GRC forecast period.

f) See SCE's response to Data Request set PAO-SCE-Verbal-002, specifically in the folder for SCE-03 Vol. 01, the Excel file titled "WPSCE-03V01ChVBaldwin - Paper Bill Fee."

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET P u b A d v - S C E - 1 9 4 - M C L

To: Public Advocates Office
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 3/1/2024

Response Date: 3/12/2024

Question 04.b Supplemental:

"Referring to Ex. SCE-03, Vol. 1, p. 124, SCE proposes \$0.61 per billing statement for Residential and Non-Residential customers.

b. Provide the current paper bill cost per piece that all customers are currently paying. Please identify and separately list all of SCE's customer classes.

Response to Question 04.b Supplemental:

SCE's initial response dated October 9, 2023 stated:

b) SCE does not currently and has never before charged a paper bill fee; the proposed paper bill fee in Exhibit SCE-03, Volume 1 would be a new fee, to take effect beginning in 2025.

The \$0.61 cost per piece referenced in testimony is based on year end 2022 data, which is current in the sense that 2022 is the most recent full year.

To the extent the question is asking for 2023 data, SCE has not repeated the analysis subsequent to filing its GRC application using 2023 data. Further, SCE does not have final, adjusted recorded cost data available for 2023. SCE will provide preliminary 2023 recorded data to parties once that data is final and appropriately adjusted for accuracy, which is anticipated in March 2024. This is consistent with the September 5, 2023 Assigned Commissioner's Scoping Memo which is excerpted below.

"SCE supports providing 2023 recorded data in this proceeding but requests a due date of March 11, 2024. SCE states that the 2023 data is not available until mid-February 2024 and that SCE requires some additional time to review, analyze, and adjust the data to ensure accuracy. SCE's proposed due date is reasonable and will still allow for the timely consideration of the 2023 recorded data in this proceeding. Therefore, SCE's proposed due date is adopted and incorporated into the proceeding schedule." September 5, 2023 Assigned Commissioner's Scoping Memo and Ruling at p. 9 (internal citations omitted).

Customer classes consist of: residential, commercial, agricultural, industrial and public authorities.

SCE submits this supplemental response to provide additional information for 2023.

As stated previously, SCE does not currently charge a paper bill fee; however, SCE used 2023

recorded information to calculate the equivalent of the \$0.61 cost per piece referenced in testimony that was based on year end 2022 data. Using year end 2023 data, this value is \$0.65 cost per piece.

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET C a l C C A - S C E - 0 0 4

To: CalCCA
Prepared by: Mary Nguyen
Job Title: Project Manager
Received Date: 12/29/2023

Response Date: 1/16/2024

Question 4.4.a-c:

Referring to the below summary workpaper used by SCE to support the MAMF in A.19-08-013 (per Exhibit SCE-03, Vol. 6 Workpapers, p. 96):

- a. For each “Activity” listed in the table above, please explain which activity or activities in the A.23-05-010 MAMF workpaper (“WPSCE-03V01ChVBlackwell - CCA DA OOR.xls, sheet Wkp CCA18MAMF per SA”) correspond to, or are analogous to, the listed Activity.
- b. Please identify each “Activity” listed in the table above for which there is not a corresponding or analogous activity in the A.23-05-010 MAMF workpaper. For each activity identified, please explain why the activity was accounted for in the A.19-08-013 MAMF workpaper but does not appear in the current Application’s workpapers.
- c. Please identify each activity in the A.23-05-010 MAMF workpaper for which there is not a corresponding or analogous activity in the table above. For each activity identified, please explain why the activity was accounted for in the current Application’s workpaper but does not appear in the A.19-08-013 MAMF workpaper.

Activity	Occurrence	Quantity	Unit	Class	Rate/unit	Cost	Pct. Total
Process exceptions - CCS	0.18%	8.65	minutes	APP3_B	\$1.60	\$0.02422	42%
Generate SA Switch Report and Provide Status of each SA to CCA/Calpine Weekly	0.00%	253.83	minutes	APP3_B	\$1.60	\$0.00135	2%
Weekly Account Status Call - Project Manager	0.00%	60.00	minutes	MFP1_B	\$1.88	\$0.00038	1%
Weekly Account Status Call - Analyst	0.00%	60.00	minutes	APP3_B	\$1.60	\$0.00032	0.6%
Weekly IT Meeting Regarding Exceptions - Project Manager	0.00%	60.00	minutes	MFP1_B	\$1.88	\$0.00038	1%
Weekly IT Meeting Regarding Exceptions - Analyst	0.00%	60.00	minutes	APP3_B	\$1.60	\$0.00032	0.6%
Process exceptions - CBO	0.08%	30.00	minutes	ABU2_R	\$1.22	\$0.03039	53%
MAMF - Per Service Account Total						\$0.05735	
2021 Proposed Fee (Rounded)						\$0.06	

Response to Question 4.4.a-c:

a.

1. “Process exceptions - CCS” corresponds to the “CCA Assistance and Account Exception Processing - Customer Choice Services (CCS) Related” activities found in the current MAMF workpaper (Lines 3-14).
2. “Generate SA Switch Report and Provide Status of each SA to CCA/Calpine Weekly” is no longer an existing report, though other reporting tasks occur (e.g., all customer report, daily remittance report, green-house gas report, address validation, arrearage management plan (AMP), disconnection report, final call/collection notice report, and battery energy storage system (BESS) account report) and correspond to the “Operational Activities - Customer Choice Services (CCS) Related” activities found in the current MAMF workpaper (Lines 28-34).
3. “Weekly Account Status Call - Project Manager,” “Weekly Account Status Call - Analyst,” “Weekly IT Meeting Regarding Exceptions - Project Manager,” and “Weekly IT Meeting Regarding Exceptions - Analyst” correspond to the “Operational Activities - Customer Choice Services (CCS) Related” activities in the current MAMF workpaper (Lines 28-34).
4. “Process exceptions - CBO” corresponds to the “CCA Assistance and Account Exception Processing - Billing Related” activities found in the current MAMF workpaper (Lines 15-20).

b. N/A, all activities listed have a corresponding or analogous activity in the current MAMF workpaper (A.23-05-010). See response to 4.4a above.

c. The following activities below in the A.23-05-010 MAMF workpaper are new and not listed in the table above.

- i. CCA Assistance and Account Exception Processing - Information Technology Related
- ii. Operational Activities - Customer Call Center Related
- iii. Operational Activities - Information Technology Related
- iv. Operational Activities - Billing Related

For all the above-mentioned activities, the reasons these activities are accounted for in the current application MAMF workpaper and not in the A.19-08-013 MAMF workpaper are specified in testimony. Notably, Exhibit SCE-03, Volume 1, pp. 149-150 states: “The volume of SAs has grown rapidly from approximately 152,000 SAs in 2018 to 1.1 million SAs by mid-2019 and 1.58 million SAs as of the end of 2022. Based on current CCA operations, new activities have been identified relating to operational and exception work. These activities include routine internal and external CCA operational meetings to address CCA specific inquiries, review SA switches, and resolve billing and data issues.”

See also p. 146 which states (footnotes omitted): “State law and Commission precedent require SCE to recover all costs specifically attributable to CCAs from CCA customers so that SCE’s bundled

service customers remain indifferent to load departing to CCA service and do not subsidize CCA customers. Therefore, SCE is required to charge CCAs for all of SCE's reasonable costs of notices, billing, metering, collections, customer communication, and other services provided to a CCA."

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET C a l C C A - S C E - 0 0 4

To: CalCCA
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 12/29/2023

Response Date: 1/19/2024

Question 4.6.a-c:

Referring to A.19-08-013, Joint Motion By Southern California Edison Company (U 338-E), California Choice Energy Authority, And The Clean Power Alliance Of Southern California For Approval Of 2021 General Rate Case Settlement Agreement, September 12, 2020, page 5, which states: “SCE commits to working with the SoCal CCAs to investigate and potentially implement processes, as appropriate, to (1) reduce the number of exceptions that occur with respect to CCA service accounts in order to reduce manual work and service fees related to exception work generally...”:

- a. Please describe, in detail, how SCE complied with this section of the Settlement.
- b. Did the number of exceptions increase or decrease since 2019? Please document the number of exceptions processed in each year from 2019 through year to date 2023.
- c. Has SCE reduced the manual work associated with exception processing? If “yes,” please explain in detail the manual work reductions (e.g., compare the manual work provided in the current workpapers versus that in the A.19-08-013 workpapers). If “no,” please explain in detail why SCE is expending more manual work on service fees than in 2019.

Response to Question 4.6.a-c:

The Joint Motion referenced in the question is dated September 10, 2023.

- a. SCE’s Final Report Pursuant to the 2021 General Rate Case Settlement Agreement, pp. 4-11, provides information on SCE’s efforts to reduce the number of exceptions related to CCA service accounts since 2020 through the submission of the final report in February 2022. See also SCE’s response to question 4.2c of this data request set.

Since February 2022, SCE has implemented additional process improvement efforts to reduce exceptions which continue to focus on three areas: (1) implementing interim processes and fixes to more quickly identify and resolve issues as they arise; (2) training additional resources to both identify and resolve the backlog of exceptions that occurred due to the legacy system issues and the transition to CSRP; and (3) implementing company-wide system “enhancements” to the new platforming system. See chart below for details on projects. Please note that the chart is not exhaustive and may not include all related projects or initiatives.

Focus Area	Item#	Project Name	Description	Impact on Manual Work
1	1	CHEQ Program	CHEQ “CCA Service Request (CCASR) Handling, Exceptions & Quality” is a quality management program that aims to monitor the accurate and timely completion of enrollment/de-enrollment CCASRs, exception processing, and provide satisfactory quality reporting and control measures for monitoring CCA activities program wide. <i>(Effective Dec 2023)</i>	Allows for consistent program reporting, monitoring, and early detection of various exceptions.
	2	Pending CCASR Tool	A tool that monitors pending CCASRs that did not connect/drop on their Intended Switch Date into exception types and provides the necessary actions to complete the enrollment/de-enrollment from CCA service. <i>(Effective Jun 2023)</i>	Reduced efforts required to manually research exception work.
	3	Exception Processing Automation Tools	Leveraging robotics process automation tools or BOTs to support resolution of various process exceptions in bulk. The following CCA processes now leverage robotics to resolve exceptions: <ul style="list-style-type: none"> - CCA Exception Re-Processing <i>(Effective Oct 2022)</i> - CCASR Enrollment/De- 	Reprocessing eligible exception work in bulk. Reduced manual researching efforts related to exception reprocessing.

			<p>enrollments <i>(Effective Jun 2022)</i></p> <ul style="list-style-type: none"> - CCA Program Eligibility account indicators <i>(Effective Jun 2022)</i> 	
2	4	Additional Resources	<p>Added two additional resources to support operational activities in March of 2022. These resources completed their training in August 2022 and began assisting in clearing the backlog of exception work.</p> <p><i>(Hired March 2022/Trained August 2022)</i></p>	Additional resources helped support incoming exception volumes and exception backlogs.
3	5	CCASR Enrollment/De-enrollment Process System Enhancement Projects	<ol style="list-style-type: none"> 1. Improved the accuracy of Electronic Data Interface (EDI) communication with third parties, by adding new drop reason codes and corrected system logic related to CCA drops and enrollments. <i>(Effective Oct 2022)</i> 2. Implemented SAP transaction codes to change CCASR statuses in mass. <i>(Effective Jan 2023)</i> 3. Improved system tracking and reporting of rejected inbound enrollments and drop exceptions. <i>(Effective Nov 2022)</i> 4. Enabled inbound enrollments for 	<ol style="list-style-type: none"> 1. Reduced the volume of CCA drops requiring manual correction. Reduced the number of CCA back-office inquiries related to conflicting EDI communication. 2. Reduced manual efforts of cancelling CCASR enrollment/de-enrollments one by one. 3. Reduced the need for ad hoc reporting and improved our ability to perform rejections in real time and provided better

			<p>Positive Election customers and removed 5-day requirement for enrollments. <i>(Effective Oct 2023)</i></p> <p>5. Enhanced capabilities to ensure ineligible accounts do not enroll into CCA. <i>(Effective Dec 2023)</i></p> <p>6. Enhanced EDI system capabilities to be able to process CCA customer account correction requests systematically as opposed to using non-EDI technology to communicate with CCA back-office. <i>(Effective Dec 2023)</i></p>	<p>tracking and visibility to our rejection volume.</p> <p>4. Reduced the need for manual submission via CCA back-office intake form or online excel tracker for Positive Election enrollments.</p> <p>5. Reduced the number of exceptions and manual correction resulting from this issue.</p> <p>6. Reduced the steps required to communicate with CCA back-office outside of the EDI system before processing CCA customer account move in date and move out date corrections.</p>
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b. There are two CCA fees that include manual work for exception processing: the MAMF and Meter Data Management Agent (MDMA) fee. Below are the number of exceptions recorded in connection with those two fees. The total number of exceptions decreased from 2019 to 2020 and also decreased from 2022 to 2023. See response to 4.6c for additional details on why years 2019-2020 cannot be compared to 2022-2023 and why 2021 should be omitted from the comparison. CCS stands for Customer Choice Services and CBO stands for Customer Billing Operations.

2019 Actuals	Occurrence Per SA	Occurrence Per Month
MAMF - Process exceptions - CCS	1.03%	9,593

MAMF - Process exceptions - CBO	0.02%	179
MDMA - Exception Processing	0.00%	45
Total	1.05%	9,817

Approx. 929K SAs

2020 Actuals	Occurrence Per SA	Occurrence Per Month
MAMF - Process exceptions - CCS	0.47%	6,011
MAMF - Process exceptions - CBO	0.01%	79
MDMA - Exception Processing	0.00%	42
Total	0.48%	6,132

Approx. 1.3M SAs

2021 Actuals - Pre CSRP	Occurrence Per SA	Occurrence Per Month
MAMF - Process exceptions - CCS	-	-
MAMF - Process exceptions - CBO	0.02%	323
MDMA - Exception Processing	0.00%	6
Total	0.02%	329

Approx. 1.3M SAs

2021 Actuals Post CSRP	Occurrence Per SA	Occurrence Per Month
MAMF - CCA Assistance and Account Exception Processing - Customer Choice Services (CCS) Related	0.43%	5,530
MAMF - CCA Assistance and Account Exception Processing - Billing Related	0.64%	8,285
MAMF - CCA Assistance and Account Exception Processing - Information Technology Related	0.00%	48
MDMA - Exception Processing	0.00%	0.3
MDMA - Intake and Processing Work	0.00%	6
Total	1.07%	13,870

Approx. 1.3M SAs

2022 Actuals	Occurrence Per SA	Occurrence Per Month
MAMF - CCA Assistance and Account Exception Processing - Customer Choice Services (CCS) Related	0.29%	4,605
MAMF - CCA Assistance and Account Exception Processing - Billing Related	0.46%	7,183

MAMF - CCA Assistance and Account Exception Processing - Information Technology Related	0.01%	178
MDMA - Exception Processing	0.02%	347
MDMA - Intake and Processing Work	0.00%	39
Total	0.78%	12,351

Approx. 1.6M SAs

2023 Actuals	Occurrence Per SA	Occurrence Per Month
MAMF - CCA Assistance and Account Exception Processing - Customer Choice Services (CCS) Related	0.21%	3,393
MAMF - CCA Assistance and Account Exception Processing - Billing Related	0.33%	5,214
MAMF - CCA Assistance and Account Exception Processing - Information Technology Related	0.01%	200
MDMA - Exception Processing	0.02%	335
MDMA - Intake and Processing Work	0.00%	28
Total	0.57%	9,170

Approx. 1.6M SAs

c. SCE has reduced the manual work associated with exception processing in that the total number of exceptions went down from 2019 to 2020 and from 2022 to 2023, as shown in the response to 4.6b above. It is important to note that data in SCE's legacy system (before April 2021) are not directly comparable to data in SCE's new system due to variations in system tracking and processing mechanisms; moving to the new SAP system increased visibility to the CCA account exception work as well as CCA assistance work. In addition, 2021 data was provided for responsiveness to question 4.6b, however, it should not be used in comparison with other years because it is a non-representative transition year in which SCE was undergoing stabilization of system and processes.

Despite these year-to-year reductions in the number of exceptions, comparing the number of exceptions from the 2021 GRC MAMF and MDMA workpapers (when data is repopulated with 2019 actuals) with the number of exceptions in the 2025 GRC MAMF and MDMA workpapers (which is based on 2022 actuals) shows an overall increase. See below for the relevant activities and occurrence data from the 2021 GRC workpapers (A.19-08-013 MAMF workpaper sub-activity 1 and 7 and MDMA fee workpaper sub-activity 1), alongside the relevant activities and occurrence data from the 2025 GRC workpaper (A.23-05-010 MAMF workpaper lines 3-24 and MDMA fee workpaper line 4 and 7). The occurrence data from the 2021 workpapers have been repopulated to reflect 2019 actual data. The overall increase does not reflect that SCE has failed to reduce manual work associated with exception processing. Rather, it reflects that despite these reductions, the number of exceptions and associated manual work nonetheless increased due to better tracking and visibility of CCA activities as explained above and increased service accounts.

2021 GRC MAMF/MDMA (Based off of 2019 Actuals)	Occurrence Per SA	Occurrence Per Month
Process exceptions - CCS	1.03%	9,593
Process exceptions - CBO	0.02%	179
MDMA - Exception Processing	0.0%	45
Total	1.05%	9,817

Approx. 929K SAs

2025 GRC MAMF/MDMA (Based off of 2022 Actuals)	Occurrence Per SA	Occurrence Per Month
MAMF - CCA Assistance and Account Exception Processing - Customer Choice Services (CCS) Related	0.29%	4,605*
MAMF - CCA Assistance and Account Exception Processing - Billing Related	0.46%	7,183
MAMF - CCA Assistance and Account Exception Processing - Information Technology Related	0.01%	178
MDMA - Exception Processing	0.02%	347
MDMA - Intake and Processing Work	0.00%	39
Total	0.78%	12,351

Approx. 1.6M SAs

*When preparing this data request response, SCE discovered an error in the A.23-05-010 MAMF workpaper. Specifically, Line 11 was erroneously included and should be deleted. SCE will make this correction in future errata. This correction will not change the fee amount.

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET C a l C C A - S C E - 0 0 3

To: CalCCA
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 11/21/2023

Response Date: 12/6/2023

Question 3.14.a:

Referring to Times Series Zip file: MAMF Fee per SA_IT Related_Timestudy 1-4. For SA IT related tasks, the number of observations from the Time Series files are null but the Sub-activity process steps show the average processing time and occurrences per month:

a. How was the average of 3 occurrences calculated, and how was the 960 minute average processing time calculated (see section on sub-activity processing steps in picture below)?



Response to Question 3.14.a:

SCE clarifies that for the Time Studies zip file provided in response to CalCCA-SCE-001, Question 1.8c, files MAMF Fee per SA_IT Related_Timestudy 1-3, there is no number of observations listed and the sub-activity process steps section explains how the estimated average processing time was determined. For MAMF Fee per SA_IT Related_Timestudy 4, there is no number of observations or sub-activity process steps; the file shows estimated hours for the meetings described.

Specifically for MAMF Fee per SA_IT Related_Timestudy 1 shown in the question, the monthly estimated average of 3 occurrences is based on 41 actual occurrences from 2022, divided by 12 months, and rounded.

The estimated average processing time for a Priority 3 request is 960 minutes (16 hours x 60 minutes per hour). SCE estimated based on historical experience in 2022. In addition, SCE's current target is to resolve Priority 3 issues within 8 hours. SCE estimated that, on average, multiple MSPs would work simultaneously to resolve a Priority 3 issue within 8 hours (e.g., 2 MSPs simultaneously working 8 hours each), resulting in a total estimated 16 MSP hours.

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET C a l C C A - S C E - 0 0 6

To: CalCCA
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 2/13/2024

Response Date: 2/23/2024

Question 6.1.a-c:

Referring to SCE’s response to CalCCA Data Request 3.14a, and specifically SCE’s statement that: “The estimated average processing time for a Priority 3 request is 960 minutes (16 hours x 60 minutes per hour).

SCE estimated based on historical experience in 2022. In addition, SCE’s current target is to resolve Priority 3 issues within 8 hours. SCE estimated that, on average, multiple MSPs would work simultaneously to resolve a Priority 3 issue within 8 hours (e.g., 2 MSPs simultaneously working 8 hours each), resulting in a total estimated 16 MSP hours.”

- a. How were the referenced estimates made?
- b. Who made the estimates?
- c. What steps has SCE made to reduce the number of events that require manual processing and reduce the time required perform the processing?

Response to Question 6.1.a-c:

a. To make the estimate, an SCE IT subject matter expert used historical experience regarding resource planning matters relevant to the 2022 base year, which includes a target to respond to Priority 3 issues within 8 hours. Further, the IT subject matter expert considered the 24/7 availability and support window, different skill sets required to support multiple processes and functionalities, and efforts to investigate, resolve, permanent fix, and optimize overall system performance in order to estimate that on average two resources are needed to address a Priority 3 issue.

b. An SCE IT subject matter expert in resource planning.

c. The projects/enhancements in the table in SCE’s response to data request CalCCA-SCE-004, Q4.2c may also impact IT ticket occurrences (including IDEX and ODS priority 3 and 4 occurrences). In addition, the IT team strives to achieve continuous improvement to reduce exceptions and processing time through ongoing efforts to reduce fallout and optimize batch runs.

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET CalCCA - SCE - 006

To: CalCCA
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 2/13/2024

Response Date: 2/23/2024

Question 6.8:

Referring to SCE’s Data Responses to CalCCA Data Requests 3.13 and 3.14, for the MAMF activities for which SCE did not perform a time study, how did SCE determine its time estimates? Please provide all documentation/analyses supporting these estimates.

Response to Question 6.8:

In data request response CalCCA-SCE-003, Q3.14, SCE stated, “SCE clarifies that for the Time Studies zip file provided in response to CalCCA-SCE-001, Question 1.8c, files MAMF Fee per SA_IT Related_Timestudy 1-3, there is no number of observations listed and the sub-activity process steps section explains how the estimated average processing time was determined. For MAMF Fee per SA_IT Related_Timestudy 4, there is no number of observations or sub-activity process steps; the file shows estimated hours for the meetings described.”

SCE understands the question to be asking about the items that were the subject of CalCCA Data Requests 3.13 (i.e., MAMF Fee per SA_IT Related_Timestudy 4, Lines 18-22) and 3.14 (i.e., MAMF Fee per SA_IT Related_Timestudy 1-3) and for which SCE did not perform observations.

See below for further explanation on how SCE determined time estimates where there were no observations:

MAMF Fee per SA IT Related Timestudy 1: For “IDEX IT Data - Priority 3,” see SCE’s responses to CalCCA Data Request 3.14 and 6.1a.

MAMF Fee per SA IT Related Timestudy 2: For “ODS IT Data - Priority 4,” the estimated average processing time for a Priority 4 request is 8.5 hours (or 510 minutes). To make this estimate, an SCE IT subject matter expert used historical experience regarding resource planning matters relevant to the 2022 base year, which includes a target to respond to Priority 4 issues within 5 business days. Further, the IT subject matter expert considered the 24/7 availability and support window, different skill sets required to support multiple processes and functionalities, and efforts to investigate, resolve, permanent fix, and optimize overall system performance to address Priority 4 issues.

MAMF Fee per SA IT Related Timestudy 3: For “IDEX IT Data - Priority 4”, the estimated average processing time for a Priority 4 request is 2.4 hours (or 282 minutes). To make this estimate, an SCE IT subject matter expert used historical experience regarding resource planning matters relevant to the 2022 base year, which includes a target to respond to Priority 4 issues within 5 business days. Further, the IT subject matter expert considered the 24/7 availability and support window, different skill sets required to support multiple processes and functionalities, and efforts to investigate, resolve, permanent fix, and optimize overall system performance to address Priority 4 issues.

MAMF Fee per SA IT Related Timestudy 4, Lines 18-22: For lines 18-22, SCE IT subject matter experts that performed the work estimated these meeting hours based upon meetings that occurred in the 2022 base year that are specifically related to operational CCA-activities.

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET C a l C C A - S C E - 0 0 3

To: CalCCA
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 11/21/2023

Response Date: 12/5/2023

Question 3.6.a-d:

Referring to WPSCE-03V01ChVBlackwell - CCA DA OOR 2023, sheet Wkp CCA18 MAMF per SA Line No. 4:

- a. Explain in detail the “BCD CCS Support Request: CCA Inquiries” task.
- b. Are these tasks and the related calculations for these tasks associated with both onboarding new CCA customers and existing customers?
- c. If “yes,” what percentage or how many of these occurrences are associated with new CCA customers?
- d. Are any of the occurrences required because of CCA errors? If yes, what fraction of the total occurrences are associated with CCA errors?

Response to Question 3.6.a-d:

- a. This task entails providing support requested by a CCA for matters such as eligibility-related inquiries, escalations, Community Choice Aggregation Service Request (CCASR) Connect/Disconnect, and other CCA requests received.
- b. SCE interprets “onboarding new CCA customers” to mean enrollment-¹ and mass-enrollment-related activities, and “existing customers” to mean de-enrollment- and move-out-related activities. Yes, the “BCD CCS Support Request: CCA Inquiries” task and the related calculations for this task are associated with both (see response to 3.6c for more details).
- c. SCE interprets “new CCA customers” to mean “onboarding new CCA customers,” as that phrase is interpreted in the response to 3.6b. See below for the percentage(s) of occurrences associated with onboarding new CCA customers, based on data from 2022:
 - 1.3% Mass-enrollment-related
 - 12.1% Enrollment-related (non-mass-enrollment)
- d. SCE does not track whether an occurrence is required because of a CCA error.

¹ Enrollment-related activities include move-in-related activities.

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET C a l C C A - S C E - 0 0 3

To: CalCCA
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 11/21/2023

Response Date: 12/5/2023

Question 3.7.a-d:

Referring to WPSCE-03V01ChVBlackwell - CCA DA OOR 2023, sheet Wkp CCA18 MAMF per SA Line No. 5:

- a. Explain in detail the CCA Bill Final Not Received task.
- b. Are these tasks and the related calculations for these tasks associated with both onboarding new CCA customers and existing customers?
- c. If “yes,” what percentage or how many of these occurrences are associated with new CCA customers?
- d. Are any of the occurrences required because of CCA errors? If yes, what fraction of the total occurrences are associated with CCA errors?

Response to Question 3.7.a-d:

- a. The “CCA Bill Final Not Received” (i.e., “CCA Final Bill Not Received” at line no. 5) task is initiated when a CCA charge is not received by SCE from the CCA within 4 days and requires follow-up action to prepare a final invoice. This task is completed once SCE receives the CCA charges to prepare the final invoice to issue to the customer.
- b. SCE interprets “onboarding new CCA customers” to mean enrollment-¹ and mass-enrollment-related activities, and “existing customers” to mean de-enrollment- and move-out-related activities. The “CCA Bill Final Not Received” task and the related calculations for this task are not associated with onboarding new CCA customers. The “CCA Bill Final Not Received” task and the related calculations for this task are associated with existing customers.
- c. SCE interprets “new CCA customers” to mean “onboarding new CCA customers,” as that phrase is interpreted in the response to 3.7b. This question is not applicable.
- d. SCE does not track whether an occurrence is required because of a CCA error.

¹ Enrollment-related activities include move-in-related activities.

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET C a l C C A - S C E - 0 0 3

To: CalCCA
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 11/21/2023

Response Date: 12/5/2023

Question 3.8.a-d:

Referring to WPSCE-03V01ChVBlackwell - CCA DA OOR 2023, sheet Wkp CCA18 MAMF per SA Line No. 7:

- a. Explain in detail the General Process Error Resolutions (PE) task.
- b. Are these tasks and the related calculations for these tasks associated with both onboarding new CCA customers and existing customers?
- c. If “yes,” what percentage or how many of these occurrences are associated with new CCA customers?
- d. Are any of the occurrences required because of CCA errors? If yes, what fraction of the total occurrences are associated with CCA errors?

Response to Question 3.8.a-d:

- a. This task is initiated for general process/system error resolutions that require further action needing SAP technical expertise to understand root cause and resolution.
- b. SCE interprets “onboarding new CCA customers” to mean enrollment-¹ and mass-enrollment-related activities, and “existing customers” to mean de-enrollment-, move-out-, and rate changes-related activities. Yes, the “General Process Error Resolutions (PE)” task and the related calculations for this task are associated with both.
- c. SCE interprets “new CCA customers” to mean “onboarding new CCA customers,” as that phrase is interpreted in the response to 3.8b. Data is insufficient for SCE to provide the percentage or number of occurrences associated with onboarding new CCA customers.
- d. SCE does not track whether an occurrence is required because of a CCA error.

¹ Enrollment-related activities include move-in-related activities.

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET C a l C C A - S C E - 0 0 3

To: CalCCA
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 11/21/2023

Response Date: 12/5/2023

Question 3.9.a-d:

Referring to WPSCE-03V01ChVBlackwell - CCA DA OOR 2023, sheet Wkp CCA18 MAMF per SA Line No. 16:

- a. Explain in detail the CCA Account Billed Current/Complete task.
- b. Are these tasks and the related calculations for these tasks associated with both onboarding new CCA customers and existing customers?
- c. If “yes,” what percentage or how many of these occurrences are associated with new CCA customers?
- d. Are any of the occurrences required because of CCA errors? If yes, what fraction of the total occurrences are associated with CCA errors?

Response to Question 3.9.a-d:

- a. This task is initiated when a correction or support on an account is required and is closed/completed when the account is invoiced (e.g., account corrections and usage exceptions).
- b. SCE interprets “onboarding new CCA customers” to mean enrollment-¹ and mass-enrollment-related activities, and “existing customers” to mean de-enrollment- and move-out-related activities. Yes, the “CCA Account Billed Current/Complete” task and the related calculations for this task are associated with both (see response to 3.9c for more details).
- c. SCE interprets “new CCA customers” to mean “onboarding new CCA customers,” as that phrase is interpreted in the response to 3.9b. See below for the percentage(s) of occurrences associated with onboarding new CCA customers, based on data from 2022:
 - 1.8% Mass-enrollment-related
 - 0.04% Enrollment-related (non-mass-enrollment)
 - 0.10% Move-in-related
- d. SCE does not track whether an occurrence is required because of a CCA error.

¹ Enrollment-related activities include move-in-related activities.

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET C a l C C A - S C E - 0 0 3

To: CalCCA
Prepared by: Corinne M Sierzant
Job Title: Senior Advisor
Received Date: 11/21/2023

Response Date: 12/7/2023

Question 3.10.a-d:

Referring to WPSCE-03V01ChVBlackwell - CCA DA OOR 2023, sheet Wkp CCA18 MAMF per SA Line No. 17:

- a. Explain in detail the CCA Move In / Move Out Bill Correction task.
- b. Are these tasks and the related calculations for these tasks associated with both onboarding new CCA customers and existing customers?
- c. If “yes,” what percentage or how many of these occurrences are associated with new CCA customers?
- d. Are any of the occurrences required because of CCA errors? If yes, what fraction of the total occurrences are associated with CCA errors?

Response to Question 3.10.a-d:

a. This task is initiated when a customer requests a correction (via SCE.com or call center) for a move in or move out, including: (1) Move in date correction; (2) Move out date correction; and (3) Wrong address provided by customer resulting in account corrections for both the customer that was moved out in error and customer that was moved in in error.

b. SCE interprets “onboarding new CCA customers” to mean enrollment-¹ and mass-enrollment-related activities, and “existing customers” to mean de-enrollment- and move-out-related activities. Yes, the “CCA Move In / Move Out Bill Correction” task and the related calculations for this task are associated with both (see response to 3.10c for more details).

c. SCE interprets “new CCA customers” to mean “onboarding new CCA customers,” as that phrase is interpreted in the response to 3.10b. Data is insufficient for SCE to provide the percentage or number of occurrences associated solely with move-ins. SCE’s response here is specific to move-ins because this task is specific to move-ins and move-outs. (There is zero percent or no occurrences that are mass-enrollment-related.)

SCE clarifies that for all analogous responses in this set (i.e., 3.6c, 3.7c, 3.8c, 3.9c, 3.10c, 3.11c, and 3.12b), SCE separately provided move-in percentages where that data is readily available; otherwise, any move-in-related occurrences would be within enrollment-related occurrences.

d. SCE does not track whether an occurrence is required because of a CCA error.

¹ Enrollment-related activities include move-in-related activities.

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET C a l C C A - S C E - 0 0 4

To: CalCCA
Prepared by: Samantha Nicely
Job Title: Sr Manager
Received Date: 12/29/2023

Response Date: 1/18/2024

Question 4.2.a-c:

Referring to A.19-08-013, Joint Motion By Southern California Edison Company (U 338-E), California Choice Energy Authority, And The Clean Power Alliance Of Southern California For Approval Of 2021 General Rate Case Settlement Agreement, September 12, 2020, pages 5-6, which states:

“SCE agrees to work with the SoCal CCAs, to investigate and potentially implement processes to: (1) reduce the number of exceptions to be processed and (2) reduce or eliminate the EDI-VAN charge. SCE will provide a final report on these efforts, including a description of (a) the specific processes (including but not limited to automated processes) that SCE has implemented or intends to implement within the 12 months following SCE’s issuance of its final report, and (b) activities and costs associated with reducing or eliminating the EDI-VAN charge. SCE will receive and consider a request from the SoCal CCAs, based on their review of the final report, that SCE submit a proposal to modify the EDI-VAN charge.”

- a. Please describe in detail what SCE has done since 2020 to reduce or eliminate the EDI/VAN fee.
- b. Please provide the “final report on these efforts.”
- c. Were the specific processes recommended in the report implemented? If so, please provide a detailed description of what was implemented along with the timeline of the implementation.

Response to Question 4.2.a-c:

A.19-08-013, Joint Motion By Southern California Edison Company (U 338-E), California Choice Energy Authority, and the Clean Power Alliance of Southern California for Approval of 2021 General Rate Case Settlement Agreement, September 10, 2020, pp. 5-6 states (footnote omitted):

SCE commits to working with the SoCal CCAs to investigate and potentially implement processes, as appropriate, to (1) reduce the number of exceptions that occur with respect to CCA service accounts in order to reduce manual work and service fees related to exception work generally; (2) reduce or eliminate the EDI-VAN charge. SCE will provide a final report on these efforts, including a description of (a) the specific processes (including but not limited to automated processes) that SCE has implemented or intends to implement within the 12 months following SCE’s issuance of its final report, and (b) activities and costs associated with reducing or eliminating the EDI-VAN charge. SCE will receive and consider a request from the SoCal CCAs, based on their review of the final report, that SCE

submit a proposal to modify the EDI-VAN charge.

a. The final report, which contains confidential material, includes efforts since 2020 through the submission of the final report. The project to implement a lower cost alternative solution for transmitting customer data to CCAs (EDI-VAN) was approved to proceed in September 2021 and as of the final report in February 2022, SCE's IT team was still evaluating the feasibility and cost. Since the final report, the following progress was made with an estimated completion in 2024.

- SCE IT Preliminary Cost Estimation/Budget Approval May 2023
- Business Requirements completed August 2023 (with input from Calpine)
- Business Requirements reviewed with SCE IT Architect September 2023
- As of September 2023, the project remained on track for 2024 (and as communicated to Calpine and CCAs) until notified in late October 2023 by executive management that the project was being deferred until at least 2025. Calpine and CCAs notified of deferment via email November 8, 2023.

An enhancement project to eliminate excess EDI814s for Customer Address Changes was implemented in March 2023; reducing the EDI814 volume effectively reduces VAN charges. SCE renegotiated its VAN contract and a reduced EDI-VAN fee was submitted as part of the 2025 GRC. In the 2021 GRC, SCE reduced the EDI-VAN fee from \$0.09 to \$0.05, and further proposed to reduce it from \$0.05 to \$0.02 as part of the 2025 GRC.

b. SCE objects to the request on the grounds that it calls for information or records that are equally if not more readily available to CalCCA, or that are already in CalCCA's actual or constructive possession (i.e., in the possession of one or more CCAs or entities whose interests CalCCA represents). SCE provided the final report pursuant to Sections D.3 and D.4.c of the Settlement Agreement to California Choice Energy Authority (CalChoice) and Clean Power Alliance of Southern California (CPA) on February 16, 2022. CalCCA represents the interests of both CalChoice and CPA. *See* A.23-05-010, August 29, 2023 Motion of California Community Choice Association for Party Status, pp. 1-2.

c. CSRP went live in April 2021 with the focus in 2021 on stabilization, which continued into 2022, and it was in 2022 when most of the enhancement projects were submitted and prioritized. A list of CCA-related enhancements/projects has been shared with Calpine/CCAs (~quarterly), along with updates provided via email and during meetings as applicable.

The following is a list of implemented key projects/enhancements that address efforts referenced in the report.

	Project Name	Description	System Implementation
1	Reduce EDI824 Rejection Exceptions	IT and Calpine share EDI824 rejections monthly to minimize backlog and address inflows.	December 2023

		Completed Project: Suppress EDI824 Rejection for Obsolete Account	
2	Minimize Missing Charges Exceptions	<p>Completed projects:</p> <ol style="list-style-type: none"> 1. NEM Fuel Cell – Sending two channel usage via EDI instead of spreadsheet. 2. CCA Enrollment/De-enrollment with move-in/move-out – Enrollments/de-enrollments are completed or canceled when there is a move-out/move-in at the same premise. 3. Enhance CCA/DA enrollment/de-enrollment process following PA Code Change – Correct enrollments/de-enrollments are issued following a PA Code change. 4. Enable EDI814 for Obsolete CCA Enrollments/Drops – Modify system logic to send Cancel EDI814 to Calpine when SCE manually cancels pending CCA enrollments/drops. 	<p>May – July 2023</p> <p>October 2022</p>
3	Automation of Opt-Outs via EDI for Mass Enrollments	Completed Project (Phase 2): Opt-Out Enhancement	April 2022
4	EDI Enhancement to Include Balance Transfers in 820 Transactions	<p>Completed Projects:</p> <ol style="list-style-type: none"> 1. Financial Reports Revision Phase 1 – Significantly improved the usability and the data accuracy of the Addenda and Return Receivables reports. 2. EDI820 Correction for Budget Billing Plan Accounts 	<p>August and December 2023</p> <p>March 2023</p>
5	Efforts to Reduce or Eliminate EDI VAN charge	Completed Project: Eliminate Excess EDI814s for Customer Address Changes – Reduces EDI814 volume so less VAN charges.	March 2023
6	Additional Advance Metering Infrastructure (AMI) data	SCE Snowflake for Usage Data Store – Providing daily raw interval usage for CCA customers to requested third parties.	September 2023

Southern California Edison
A.23-05-010 – SCE 2025 GRC

DATA REQUEST SET C a l C C A - S C E - 0 0 4

To: CalCCA
Prepared by: Samantha Nicely
Job Title: Sr Manager
Received Date: 12/29/2023

Response Date: 1/12/2024

Question 4.3.a-d:

Referring to the attached November 8, 2023 email from Samantha Nicely, Customer Choice Services & Data Solutions, SCE: “The implementation of the EDI-VAN information technology (IT) project, diligently led by Heather, was initially targeted for Q2 2024. Unfortunately, due to the emergence of other corporate initiatives and higher priority items, we’ve had to defer this project to at least 2025”:

- a. Which “other corporate initiatives” contributed to the delay of the EDI-VAN project?
- b. Which other “higher priority items” contributed to the delay of the EDI-VAN project?
- c. Will SCE commit to the completion of the EDI-VAN project by the end of 2025?
- d. Will SCE commit to ending the EDI-VAN charge by the end of 2025?

Response to Question 4.3.a-d:

a. “[O]ther corporate initiatives” in 2024 that have contributed to the delay of the EDI-VAN project are designed to optimize billing, call center, and program operations. These focus areas require many projects to enhance technology solutions or leverage newer technology to achieve the objectives. Such initiatives will offer many self-service functionalities including proactive communications as well as other improved functionality that will benefit all customers, including CCA customers. Due to the additional technology demand, the EDI-VAN project was deferred to 2025.

b. In addition to the corporate initiatives, many regulatory compliance related technology projects had a higher priority than the EDI-VAN project. Generally, regulatory projects also impact CCA customers if they are eligible to participate in specific programs. Some such projects are Solar Billing Plan (Net Billing Tariff) implementation (multiple projects), CEC load management standards implementation, and electric vehicle (EV) sub metering resolution – billing implementation and technology projects to support Demand Response (DR) mandates.

c. There is no guarantee funding will be available to complete the EDI-VAN project in 2025 or that other higher priority items will not again defer the project beyond 2025. SCE will commit to resume efforts on the project once deemed feasible.

d. Although SCE is not able to commit to ending the EDI-VAN charge by the end of 2025, SCE did renegotiate its VAN contract and a reduced EDI-VAN fee was submitted as part of the 2025 GRC.

In the 2021 GRC, SCE reduced the EDI-VAN fee from \$0.09 to \$0.05, and further proposed to reduce it from \$0.05 to \$0.02 as part of the 2025 GRC.

**PACIFIC GAS AND ELECTRIC COMPANY
GRC 2025 SCE
Application 23-05-010
Data Response**

PG&E Data Request No.:	CalCCA_002-Q002		
PG&E File Name:	GRC-2025-SCE_DR_CalCCA_002-Q002		
Request Date:	February 2, 2024	Requester DR No.:	002
Date Sent:	February 23, 2024	Requesting Party:	California Community Choice Association
PG&E Witness:	N/A	Requester:	Julia Kantor

SUBJECT: A.23-05-010: CALCCA’S SECOND DATA REQUEST TO PG&E

QUESTION 002

Referring to PG&E’s Responses to CalCCA DR 1.1, and specifically, PG&E’s statement that:

“PG&E backbills in accordance with tariff Rule 17.1 and applicable time limitations therein (three months for residential or micro-businesses and 36 months for commercial, industrial, or agricultural customers). Any amounts incurred beyond those time limits that result in a charge to the customer are removed and recovered through PG&E’s annual true-up filings. Charges on behalf of third parties (community choice aggregator, direct access, or core transport agent) are removed via a shareholder-funded adjustment, which are then remitted to the third party”:

- a. Please confirm or deny that PG&E applies the same backbill time limitations to bundled customers and CCA customers (*i.e.*, three months for residential or micro-businesses and 36 months for commercial, industrial, or agricultural customers). If denied, please explain. If confirmed, when and why did PG&E begin its policy/practice of applying these same time limitations to CCA customers?
- b. Is it PG&E’s position that, pursuant to its Rule 17.1, it may not recover amounts from CCA customers incurred beyond these time limits specified in the rule (*i.e.*, three months for residential or micro-businesses and 36 months for commercial, industrial, or agricultural customers)? Please explain.
- c. Please confirm or deny that the following accurately describes PG&E’s general billing practices when it is issuing a backbill to a CCA customer (and if denied, please explain):

PG&E bills customers such that the customer sees all charges (including all backbill amounts associated with the delayed bill) along with the PG&E credits for both CCA charges and transmission and distribution charges. This customer credit is called the "Customer Satisfaction Adjustment."

When a customer makes a payment, that payment triggers the release of credits from PG&E to the CCA (i.e., the credits associated with the costs incurred beyond the time limits of Rule 17.1). Credits flow through to the CCA once the customer pays the relevant bill.

ANSWER 002

- a. PG&E objects to the extent the question calls for a legal conclusion. Subject to, and notwithstanding this objection, PG&E responds as follows:

PG&E confirms that it applies the same backbilling time limitations to bundled customers and CCA customers (i.e., three months for residential or micro-businesses and 36 months for commercial, industrial, or agricultural customers). This has been PG&E's interpretation since the inception of CCAs within PG&E's service territory.

- b. PG&E objects to the extent the question calls for a legal conclusion. Subject to, and notwithstanding this objection, PG&E responds as follows:

Yes, it is PG&E's position that PG&E may not recover amounts for CCA customers beyond the applicable backbilling limitations.

- c. The credits associated with PG&E's portion of the billable charges beyond the 3-month or 36-month back billing limitations is called a Customer Revenue Adjustment. PG&E confirms that a "Customer Satisfaction Adjustment" credit is applied to CCA charges beyond the backbilling time limitations.

PACIFIC GAS AND ELECTRIC COMPANY
2025 General Rate Case Southern California Edison Company
Application 23-05-010
Data Response

PG&E Data Request No.:	CalCCA_001-Q001-SUPP01		
PG&E File Name:	GRC-2025-Phi_DR_CalCCA_001-Q001-SUPP01		
Request Date:	December 1, 2023	Requester DR No.:	001
Date Sent:	December 22, 2023 Supplemental Response Q1C January 8, 2024	Requesting Party:	California Community Choice Association
PG&E Witness:	N/A	Requester:	Julia Kantor

QUESTION 001

Referring to SCE’s Prepared Testimony at Exh. SCE-03 Vol. 1 at pp. 13- 30 concerning SCE’s Billing Services:

- a. Please describe PG&E’s policy for covering/refunding costs incurred beyond the backbill time limits in Rule 17 (including the mechanics of how PG&E remits credits/adjustments to the relevant customer and/or community choice aggregator).
- b. Are PG&E’s backbilling policies and practices under Rule 17 identical for bundled and unbundled customers (i.e., with respect to how backbill limits and remittance amounts are handled for bundled and unbundled customers’ generation and transmission and distribution charges)? Please explain.
- c. If the answer to part (b) is yes, please explain when and how this policy developed for both bundled and unbundled customers. If the answer to part (b) is no, please explain when and how these policies developed and PG&E’s rationale for the different policies/practices.
- d. To PG&E’s knowledge, are PG&E’s backbilling policies and practices under Rule 17 the same as SCE’s (i.e., with respect to how backbill limits and remittance amounts are handled for bundled and unbundled customers’ generation and transmission and distribution charges)? If not, please explain the reason(s) for any differences.
- e. To PG&E’s knowledge, is it the Commission’s intention that the investor-owned utilities maintain uniform procedures (as between bundled and unbundled customers) with respect to adjustments of bills for billing errors? Please explain.
- f. To PG&E’s knowledge, is it the Commission’s intention that the investor-owned utilities maintain uniform procedures (as between utility service territories) with respect to adjustments of bills for billing errors? Please explain.

ANSWER 001

- a. PG&E backbills in accordance with tariff Rule 17.1 and applicable time limitations therein (three months for residential or micro-businesses and 36 months for commercial, industrial, or agricultural customers). Any amounts incurred beyond

those time limits that result in a charge to the customer are removed and recovered through PG&E's annual true-up filings. Charges on behalf of third parties (community choice aggregator, direct access, or core transport agent) are removed via a shareholder-funded adjustment, which are then remitted to the third party.

- b. No. PG&E's policies under Rule 17.1 are identical for bundled and unbundled customers except with regard to how additional charges are removed from customers' accounts that are beyond the Rule 17.1 backbilling period. Please see PG&E's response to subpart a.
- c. PG&E will provide a response at a later date.
- d. PG&E objects to this request as calling for speculation. Subject to and without waiving this objection, PG&E responds as follows:

To PG&E's knowledge, in general there may be some differences between PG&E's back billing policies and practices and SCE's policies and practices under Rule 17 "with respect to how backbill limits and remittance amounts are handled for bundled and unbundled customers' generation and transmission and distribution charges." However, PG&E is not aware of the details and specifications of SCE's policies and practices. Therefore, PG&E is unable at this time to elaborate on what these differences may be or explain the reason for any differences.

PG&E is aware the Commission is considering this issue in their active CCA Code of Conduct audit.

- e. PG&E objects to this request on the ground that the best evidence of the Commission's intention are the Commission's decisions, rules, orders, and related requirements. On a related note, PG&E further objects to the request to the extent it seeks legal conclusions. PG&E also objects to the request to the extent it calls for speculation. Subject to and without waiving these objections, PG&E responds as follows:

PG&E is not aware of the Commission's intention regarding utilities maintaining uniform procedures.

- f. PG&E objects to this request on the ground that the best evidence of the Commission's intention are the Commission's decisions, rules, orders, and related requirements. On a related note, PG&E further objects to the request to the extent it seeks legal conclusions. PG&E also objects to the request to the extent it calls for speculation. Subject to and without waiving these objections, PG&E responds as follows:

See response to subpart e.

ANSWER 001 – SUPPLEMENTAL 01

c. PG&E's policy was implemented in approximately 2003 to overcome limited functionality in its customer care and billing (CC&B) system and the electronic data interface (EDI) used to communicate usage, billing, and customer information to third parties (initially direct access and core transport agents, and later community choice aggregators). These parties could not be provided pertinent calculation details through the EDI process to validate any customer credits issued.

*, Southern California Edison
A.23-05-010 – SCE 2025 GRC*

DATA REQUEST SET CalCCA - SCE - 005

To: CalCCA
Prepared by: Daniel Miller
Job Title: Billing Operations Manager
Received Date: 1/24/2024

Response Date: 2/7/2024

Question 5.4.a-b:

Referring to SCE's Responses to CalCCA DRs 3.16 and 4.08:

a. In the event that a billing error has occurred with a CCA customer, please confirm or deny that SCE's practice is to withdraw any payment it has already made to the CCA associated with that bill, and then refund that CCA only if and when the billing issue has been resolved. If denied, please explain.

b. In the event that a billing error has occurred with a CCA customer, and the CCA requests access to SCE's records on that billing issue, please confirm or deny that SCE's practice is to charge the CCA a fee for access. If confirmed, what is the amount of that fee? If denied, please explain.

Response to Question 5.4.a-b:

- a. When a billing error has occurred with a CCA customer, SCE's practice is to reverse the original bill charges and rebill with the corrected charges, including the CCA charges. SCE reflects reversals to the CCA charges (if already paid) as debits on the CCA's supplier account. Upon final resolution of the revised bill(s) sent to the customer(s), SCE credits the corrected amount of CCA charges (to the extent already paid by the customer) to the CCA as part of a daily batch process. This process is closely coordinated with the CCA's back office processor via EDI 810.
- b. In the event that a billing error has occurred with a CCA customer, and the CCA requests access to SCE's records on that billing issue, SCE is authorized to charge the CCA a fee for access under its Account Assistance Fee, which is time and materials fee.

In practice, SCE currently provides access and a detailed analysis of the error at no charge. If the CCA has further inquiries beyond what is initially provided, or if the CCA requests additional services such as further account analysis, duplicate bills, and/or balance reconciliation, SCE may charge an Account Assistance Fee based on the estimated hours and hourly rates of the SCE experts needed to address the additional requests.

Before SCE proceeds with work for which an Account Assistance Fee would be charged, the CCA would be notified and given an estimate for approval. To date, there have been no

Appendix B

Customer Service Operations Workpapers

**SCE-14, Vol. 01: Rebuttal Testimony on Customer Service Operations
Appendix B Workpapers**

WORKPAPERS	PAGE(S)
SCE-03, Vol 1, pp. 8-11, Frontline Billing Operations – Operational Efficiency Measures O&M Expense Forecast.	B1-B4
SCE-03, Vol 1E4, p. 12E4, Frontline Billing Operations – Net Energy Metering Exception Forecast.	B5
SCE-03, Vol 1, p. 13, Digital Labor O&M Expense Adjustment	B6
SCE-03, Vol 1, p. 14, Mailing Operations O&M Expense Forecast Adjustment.	B7
SCE-03, Vol 1, p. 15, Productivity Tracking O&M Expense Forecast Adjustment.	B8
SCE-03, Vol 1, p. 16, Customer Solutions Integration O&M Expense Forecast Adjustment.	B9
SCE-03, Vol 1, p. 17, Move-In / Move-Out O&M Expense Forecast.	B10
SCE-03, Vol 1, pp. 67-69, Increased NEM, CCA, and Outbound Credit Call Activities Forecast Adjustment.	B11-B13
SCE-03, Vol 1E4, pp. 192E4-193E4, CCA Fees.	B14-B15
SCE-03, Vol 1E4, p. 186E4, CCA MAMF Workpaper.	B16

SUPPLEMENTAL WORKPAPERS
Billing Services
Frontline Billing Operations - Operational Efficiency Measures O&M Expense Forecast
(SCE-03, Vol.1)

REVENUE SERVICES ORGANIZATION
ASSUMPTIONS
TABLE I

TABLE I: ASSUMPTIONS		2018	2019	2020	2021	2022	2023	2024	2025
Line No.	Description								
1	Billing Exception Growth Rate							1%	1%

REVENUE SERVICES ORGANIZATION
INCOMING BILLING EXCEPTION VOLUMES (000,000) [1]
TABLE II

Line No.	Description	Actuals						Forecast			
		2018	2019	2020	2021	2022	2023	2024	2025		
2	Account Maintenance (Partial Balancing Account)	0.318	0.322	0.215	0.211	0.242	0.543	0.549	0.554		
3	Blocks and Locks	N/A	N/A	N/A	0.184	0.024	0.144	0.145	0.147		
4	CC/ADA	0.061	0.148	0.225	0.173	0.282	0.066	0.067	0.068		
5	CISR - Third Party	N/A	N/A	N/A	N/A	N/A	N/A	0.020	0.020		
6	Complex Manual Rates	N/A	N/A	0.030	0.011	0.005	0.003	0.004	0.004		
7	Crossed Meters	N/A	N/A	N/A	N/A	N/A	0.002	0.002	0.002		
8	Customer Account Maintenance	N/A	N/A	N/A	N/A	N/A	0.016	0.016	0.017		
9	Customer Billing Escalation/Issue Resolution	N/A	N/A	N/A	N/A	N/A	0.222	0.224	0.227		
10	End to End	N/A	N/A	N/A	N/A	N/A	0.441	0.446	0.450		
11	ESC Usage Exceptions	1.279	1.235	1.168	0.384	0.104	-	-	-		
12	MDM	N/A	N/A	N/A	N/A	N/A	0.102	0.103	0.104		
13	Meter Order Processing Exceptions	0.085	0.112	0.118	0.109	0.098	0.101	0.102	0.103		
14	Micro Projects	N/A	N/A	0.047	0.002	0.010	0.011	0.011	0.011		
15	NEM Interconnection	0.062	0.053	0.052	0.078	0.115	0.120	0.121	0.122		
16	Net Energy Metering (Includes MASH)	0.103	0.123	0.123	0.182	0.190	0.105	0.106	0.107		
17	Revenue Protection	N/A	N/A	N/A	N/A	N/A	0.000	0.000	0.000		
18	RTEM Interval Usage Exceptions	0.162	0.185	0.180	0.080	0.013	-	-	-		
19	Special Billing	0.137	0.284	0.127	0.335	0.416	0.291	0.294	0.297		
20	SCE network	N/A	N/A	N/A	N/A	N/A	0.084	0.085	0.086		
21	System-Generated Exceptions	0.212	0.238	0.171	0.678	0.573	-	-	-		
22	Taskforce	N/A	N/A	N/A	N/A	N/A	-	-	-		
23	Redundant volume corrections [2]	N/A	N/A	N/A	N/A	(0.321)	(0.000)	0.004	0.004		
24	TOTAL BILLING EXCEPTIONS (000,000)	2.419	2.689	2.456	2.427	2.549	2.275	2.298	2.321		
25	Assigned Exception Processing Resource										
26	SCE Personnel						0.667	0.674	0.692		
27	Third-Party Personnel						1.064	1.075	1.075		
28	Robotics						0.543	0.549	0.554		
29	TOTAL BILLING EXCEPTIONS (000,000)	2.419	2.689	2.456	2.427	2.549	2.275	2.298	2.321		

Notes:
1. Incoming volumes do not include backlog.
2. Adjustments to reflect clean-up efforts to remove redundant volumes due to reporting/tracking anomaly.

SUPPLEMENTAL WORKPAPERS

Billing Services
Frontline Billing Operations - Operational Efficiency Measures O&M Expense Forecast
(SCE-03, Vol. 1)

REVENUE SERVICES ORGANIZATION
HANDLE TIME AND RESOURCE AVAILABILITY
TABLE III

Line No.	Description	Actuals					Forecast		
		2018	2019	2020	2021	2022	2023	2024	2025
30	SCE Average Handle Time (AHT) Pre-CSRP (Minutes)	N/A	N/A	N/A	N/A	N/A	18	18	18
31	SCE Average Handle Time (AHT) Post-CSRP (Minutes)	N/A	N/A	N/A	24	26	16	16	16
32	3rd Party Average Handle Time (AHT) Pre-CSRP (Minutes)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
33	3rd Party Average Handle Time (AHT) Post-CSRP (Minutes)	N/A	N/A	N/A	27	30	19	19	19
34	Work Days					244	244	244	244
35	Work Day Minutes					480	480	480	480
36	Available Work Time (%)					65%	65%	65%	65%
37	SCE Headcount Pre-CSRP					156	158	162	162
38	SCE Headcount Post-CSRP					138	140	143	143
39	Frontline Operational Efficiencies (Line 38)					-20	-20	-20	-20
40	SCE Adjusted Headcount Post-CSRP (Line 38 + 39)	-	-	-	-	119	120	124	124

REVENUE SERVICES ORGANIZATION
TOTAL RESOURCE COUNTS [B]
TABLE IV

Line No.	Description	Actuals					Forecast		
		2018	2019	2020	2021	2022	2023	2024	2025
41	SCE	147	175	192	174	173	138	140	143
42	Flex [4]	13	36	142	113	155	46	46	46
43	Frontline Operational Efficiencies (Line 38)					-20	-20	-20	-20
44	Total SCE (Line 41 + Line 42 + Line 43)	160	211	334	287	328	165	166	170
45	3rd Party	11	11	47	124	166	174	187	187
46	Shifted to 3rd Party Work (See Line 67)						+38	+38	+38
47	Total 3rd Party (Line 45 + Line 46)	11	11	47	124	166	212	225	225
48	Total SCE + 3rd Party (Line 44 + Line 47)	171	222	380	411	495	376	391	395

Notes:
3. Includes all funding sources.
4. 80% of 5-year Historical Actual Average. Flex, or on-demand resources, account for various factors such as unplanned projects, volume seasonality, PPS/SSW latrine event billing support, and mitigation system issues.

REVENUE SERVICES ORGANIZATION
CALCULATED EXPENSES
(Constant 2022 \$1000)
TABLE V

Line No.	Description	Forecast		
		2023	2024	2025
49	SCE Billing Analyst Annual Salary		70	70
50	Total SCE (Labor) (Line 44 x Line 49)		11,524	11,876
51	3rd Party Analyst Annual Salary		44	44
52	Total 3rd Party (Non-Labor) (Line 47 x Line 51)		9,320	9,908
53	Total SCE + 3rd Party (Line 50 + Line 52)		20,844	21,783

Sheet 2 of 4

SUPPLEMENTAL WORKPAPERS
Billing Services
 Frontline Billing Operations - Operational Efficiency Measures O&M Expense Forecast
 (SCE-03, Vol. 1)

REVENUE SERVICES ORGANIZATION
 FORECAST EFFICIENCIES- LABOR
 TABLE VI

Line No.	Description	Forecast		
		2023	2024	2025
54	Frontline Operational Efficiencies - Shifted Work (000)	94	94	94
55	SCE Average Handle Time (AHT) Pre-CSR (Minutes)	24	24	24
56	Work Days	244	244	244
57	Work Day Minutes	480	480	480
58	Headcount Savings	20	20	20
59	SCE Billing Analyst (- Savings) \$000 (Line 49)	(70)	(70)	(70)
60	Frontline Operational Efficiencies - Labor (Constant 2022 \$000) (Line 58 x Line 59)	(1,373)	(1,373)	(1,373)
61	Total Labor (Constant 2022 \$000) (Line 60)	(1,373)	(1,373)	(1,373)

REVENUE SERVICES ORGANIZATION
 INCREMENTAL WORK - NON-LABOR
 TABLE VII

Line No.	Description	Forecast		
		2023	2024	2025
62	Frontline Operational Efficiencies - Shifted Work (000)	94	94	94
63	Frontline Operational Efficiencies - Shifted Work 3rd Party Average Handle Time (AHT)	35	35	35
64	Work Days	244	244	244
65	Work Day Minutes	480	480	480
66	Resource Availability (%)	75%	75%	75%
67	OE Analyst 3rd Party Head Count	38	38	38
68	3rd Party Billing Analyst (+ Expense) \$000 (See line 51)	44	44	44
69	Frontline Operational Efficiencies - Non-Labor (Constant 2022 \$000) (Line 67 x Line 68)	1,672	1,672	1,672
70	Total Non-Labor (Constant 2022 \$000) (Line 69)	1,672	1,672	1,672

Sheet 3 of 4

SUPPLEMENTAL WORKPAPERS
Billing Services
Frontline Billing Operations - Operational Efficiency Measures O&M Expense Forecast
(SCE-03, Vol. 1)

REVENUE SERVICES ORGANIZATION
CSR SAVINGS - LABOR
TABLE VIII

Line No.	Description	Forecast		
		2023	2024	2025
71	SCE Work Volumes (000) (Line 26)			
72	SCE Average Handle Time (AHT) Pre-CSRSP (Minutes)	667	674	692
73	Work Days	18	18	18
74	Work Day Minutes	244	244	244
75	Available Work Time (%)	480	480	480
76	Pre-CSRSP FTE impact of other factors in Calculation framework	65%	65%	65%
77	Pre-CSRSP Headcount	45	45	45
78	SCE Average Handle Time (AHT) Post-CSRSP (Minutes)	201	203	207
79	Work Days	16	16	16
80	Work Day Minutes	244	244	244
81	Available Work Time (%)	480	480	480
82	Post-CSRSP FTE impact of other factors in Calculation framework (Line 42)	65%	65%	65%
83	Post-CSRSP Headcount	46	46	46
84	CSRSP Headcount Reduction (Line 77 - Line 83)	184	186	189
85	SCE Billing Analyst (- Savings) \$000 (Line 49)	17	17	18
86	Total Labor (Constant 2022 \$000) (Line 84 x Line 85)	(70)	(70)	(70)
		(1,184)	(1,197)	(1,229)

REVENUE SERVICES ORGANIZATION
TOTAL ADJUSTMENTS
(Constant 2022 \$000)
TABLE - IX

Line No.	Description	Forecast		
		2023	2024	2025
87	CSRSP Benefits (Billing Services, Realized) - Labor (Constant 2022 \$000) (Line 86)			
88	CSRSP Benefits (Billing Services, Realized) - Non-Labor (Constant 2022 \$000)	(1,184)	(1,197)	(1,229)
89	Total CSRSP Benefits (Constant 2022 \$000) (Line 87 + Line 88)	(1,184)	(1,197)	(1,229)
90	Frontline Operational Efficiencies - Labor (Constant 2022 \$000) (Line 61)	(1,373)	(1,373)	(1,373)
91	Frontline Operational Efficiencies - Non-Labor (Constant 2022 \$000) (Line 70)	1,672	1,672	1,672
92	Total Frontline Operational Efficiencies (Constant 2022 \$000) (Line 90 + Line 91)	299	299	299
93	TOTAL LABOR (Constant 2022 \$000) (Line 87 + Line 90)	(2,557)	(2,570)	(2,602)
94	TOTAL NON-LABOR (Constant 2022 \$000) (Line 88 + Line 91)	1,672	1,672	1,672
95	TOTAL (Constant 2022 \$000) (Line 93 + Line 94)	(885)	(898)	(930)

Sheet 7 of 4

SUPPLEMENTAL WORKPAPERS
Billing Services
Frontline Billing Operations - NEM O&M Forecast Adjustment
(SCE-03, Vol. 1)

544

TABLE I

Line No.	Description	Actuals *					Forecast					
		2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
1	NEM Installations (000)	294	339	385	452	626	637	745	825	880	925	966
2	Initial Monthly Estimated NEM-Related Billing Exceptions (000)	13	14	15	19	22	24	24	24	24	25	25
3	Updated Monthly Exception Rate per NEM Installation	4.5%	4.2%	3.8%	4.3%	3.6%	3.7%	3.6%	3.5%	3.5%	3.4%	3.3%
4	Updated Monthly Estimated NEM-Related Billing Exceptions (000) (Line 1 x Line 3)						24	27	29	31	31	32
5	Updated Monthly Incremental NEM-Related Billing Exceptions (000) (Line 4 - Line 2)						-	2.8	4.9	6.1	6.7	6.9
6	Annualized Incremental Exceptions (000) (Line 5 multiplied by 12 months)						-	34.0	59.2	72.7	80.0	83.0
7	SCE Average Handle Time (Post-CSR)						16	16	16	16	16	16
8	Annual Work Days						244	244	244	244	244	244
9	Total Minutes per Day						480	480	480	480	480	480
10	Productive Time %						65%	65%	65%	65%	65%	65%
11	Incremental Resource Need						-	+7	+12	+15	+17	+17
12	Average Salary (\$000)						70	70	70	70	70	70
13	Annual Incremental Labor Forecast (Constant 2022 \$000)						-	493	859	1,056	1,162	1,206
14	Annual Incremental Labor Forecast - Normalized (Constant 2022 \$000)						-	-	-	1,071	-	-

* 2022 values are a forecast.

SUPPLEMENTAL WORKPAPERS

Billing Services
Digital Labor O&M Expense Forecast
 (SCE-03, Vol. 1)

(Constant 2022 \$000)

Summary

Line No.	Description	Labor	Non-Labor	Total	Comments
1	Capitalization of Labor	(613)	-	(613)	Line 7
2	Software Licenses		330	330	Line 13
3	Misc. Adjustments	35	-	35	Increase in IT coordinator services
4	Total (Line 1 + Line 2 + Line 3)	(578)	330	(248)	

Labor Detail

Line No.	Position	Rate	FTEs	Labor
5	App Dev, Sr. Spec	\$ 115	4.00	\$ (459)
6	Prj Mgr	128	1.20	(153)
7	Total Labor (Line 5 + Line 6) [1]			\$ (613)

Non-Labor Detail

Line No.	Description	Unit Cost Per Year	# of Bots	License Period (Years)	Non-Labor
8	Robotics Software Licenses [2]				
9	2025	\$ 4.4	35	5	770
10	2027	\$ 4.4	25	5	550
11	Total Non-Labor (Normalized; (Line 9 + Line 10) ÷ 4)				330

Notes:

1. Costs for FTEs shown will not be recorded as O&M beginning in 2025.
2. Robotics software licenses are renewed for a period of five years.

SUPPLEMENTAL WORKPAPERS

Billing Services

Mailing Operations O&M Expense Forecast Adjustment

(SCE-03, Vol. 1)

(Constant 2022 \$000)

Line No.	Description	Non-Labor	Comments
1	Elimination of Printer Maintenance Expenses	(190)	Printer maintenance for the forecast period is capitalized in the Mailing Operations Capital Project (WBS CCS00SECORS00002 and CCS00SECORS00003). Cost reduction is based on 2022 recorded maintenance expenses.
2	Elimination of Equipment Usage Fees	(215)	New printing and mailing equipment contract eliminates usage fees.
3	Elimination of Supplemental Workers	(100)	With the implementation of the Mailing Operations Capital Project, SCE will close its Irvine Operations Center (IOC) facility which was used for disaster recovery. This closure will result in the elimination of two supplemental worker positions.
4	Annual Disaster Recovery Expense	110	Costs for a third-party to provide printing and mailing services in the event a disaster prevents SCE from using its facility in Rosemead. Cost estimate is based on \$270,000 in vendor costs less \$160,000 for IOC maintenance expenses that will be eliminated with the closure of the IOC.
5	Total	(395)	

SUPPLEMENTAL WORKPAPERS

Billing Services
Productivity Tracking O&M Expense Forecast Adjustment
 (SCE-03, Vol. 1)

(Constant 2022 \$000)

Non-Labor

Line No.	Description	Cost (\$000)
1	Contract Support for Productivity Tracking Tool [1]	\$ 171
2	Vendor License Fee for 2 Modules [2]	\$ 203
3	Total Non-Labor	\$ 374

Notes:

1. Contract support assumed equivalent to Sr. Specialist at approximately \$41/hr. (\$41 x 2080 hours / year * 2 FTEs = \$171,000).
2. Based on vendor invoice for license fees received in 2023.

SUPPLEMENTAL WORKPAPERS

Billing

Customer Solutions Integration O&M Expense Forecast Adjustment

(SCE-03, Vol. 1)

(Constant 2022 \$000)

Line No.	Title	# of FTEs	2022 Standard Labor Rate (\$000)	Labor (\$000)	Non-Labor (\$000)	2025 Forecast (\$000)
1	Labor					
2	Bus Ops Anlys, Principal Manager	1.0	\$ 205	\$ 205		
3	Bus Process Imprvmt, Advisor	1.0	115	115		
4	Client Svc Del Mgmt, Advisor	2.0	122	244		
5	Client Svc Del Mgmt, Senior Advisor	4.0	168	672		
6	Proj Cntrl Svcs Sr Project Manager	0.9	156	139		
7	Labor Total (Rounded)			\$ 1,375		\$ 1,375
8	Non-Labor					
9	Employee-related expenses, meal, training, conferences, etc. (approx. 8.7% of Labor)				\$ 120	\$ 120
10	Grand Total (2025-2028) [1]			\$ 1,375	\$ 120	\$ 1,494
11	50% CCC			687	60	747
12	50% RSO			687	60	747
13	Grand Total Normalized (Line 10 ÷ 4)			\$ 344	\$ 30	\$ 747
14	50% CCC (Rounded; Line 13 x 0.5)			172	15	187
15	50% Billing (Rounded; Line 13 x 0.5)			172	15	187

Note [1] SCE forecasts no expenses for 2026-2028.

SUPPLEMENTAL WORKPAPERS

Billing Services**Move-In / Move-Out O&M Expense Forecast Adjustment**
(SCE-03, Vol. 1)

Line No.	Description	Value	Forecast Amount (Constant 2022 \$000)
1	Move-In / Move-Out Meter Activity		
2	2022	30,849	
3	2025 Forecast [1]	34,548	
4	Increase in Activity above Base Year (Line 3 - Line 2)	3,699	
5	Labor Cost Per Meter Trip (2022 Recorded [2])	\$ 86.31	
6	Incremental Labor Forecast (Line 4 x Line 5)		319
7	Incremental Non-Labor Forecast [3]		22
8	Total (Line 6 + Line 7)		341

Notes

1. SCE expects a 12% increase in Move-in / Move-Out Meter activity in 2025.
2. Cost per meter trip based on recorded data for 2022 through July.
3. Non-labor expenses include incremental allocations for vehicle expenses, tools, and materials.

SUPPLEMENTAL WORKPAPERS

**Customer Contact Center
Increased NEM, CCA, and Credit Outbound Call Activities
(SCE-03, Vol. 1)**

Overview and Key Assumptions

1. Increased call volume and Average Handle Times (AHT) are a result of increased Solar adoption and program offerings (NEM enrollment, NEM billing, EV Sub-Metering), increased growth of CCA customers, and ongoing support for credit outbound calls to support Disconnect OIR required program offerings, as well as increasing complexity of discussions with customers for these call types. See testimony for details regarding SCE's expected AHT increase and incremental call volume.
2. All calls are handled by SCE ENAs.
3. Recorded (2019) and forecast (2025) call volumes and AHTs are shown in Table I below for NEM, CCA, and Credit Outbound calls.
4. The forecast increase in resources to handle the increased call volumes and AHTs shown in Table I is presented in Table II.
5. The Test Year forecast adjustment is shown in Table III.

Table I – NEM, CCA, and Credit Outbound Call Volumes and Average Handle Times				
Line No.	Description	2019 Recorded A	2025 Forecast B	Comments
1	NEM			
2	Call Volume	344,000	365,000	
3	AHT (Seconds)	380	703	
4	Total Call Time (Seconds)	130,720,000	256,595,000	Line 2 x Line 3
5	CCA			
6	Call Volume	29,000	48,000	
7	AHT (Seconds)	398	506	
8	Total Call Time (Seconds)	11,542,000	24,288,000	Line 6 x Line 7
9	Credit			
10	Call Volume	-	119,000	
11	AHT (Seconds)	-	746	
12	Total Call Time (Seconds)	-	88,774,000	Line 10 x Line 11
13	Total (NEM, CCA and Outbound Credit)			
14	Call Volume	373,000	532,000	Line 2 + Line 6 + Line 10
15	AHT (Seconds)	381	695	Weighted Average (Line 16 ÷ Line 14)
16	Total Call Time (Seconds)	142,262,000	369,657,000	Line 4 + Line 8 + Line 12

Sheet 1 of 3

SUPPLEMENTAL WORKPAPERS
Customer Contact Center
Increased NEM, CCA, and Credit Outbound Call Activities
 (SCE-03, Vol. 1)

Table II - Incremental Staffing Requirements			
Line No.	Description	Amount	Comments
17	Incremental Call Volume	159,000	Line 14 Column B - Column A
18	Average Handle Time	695	Line 15, Column B
19	Total Forecasted Incremental Call Seconds	110,480,194	Line 17 x Line 18
20	Total Forecasted Incremental Call Hours	30,689	Line 19 ÷ 3,600
21	Available annual work hours/ FTE	1,144	2080 x 0.55; Based on historical averages and accounts for time away from work due to vacations, sick time, or on the job administrative tasks that remove resources from answering calls (e.g., meetings and training).
22	Conversion to ENA FTEs	26.8	Line 20 ÷ Line 21
23	Occupancy	4.0	Line 22 x 0.15; Historical average of 85% occupancy rate which expresses the amount of time spent by the agents actually answering calls compared to the total time (which might include idle periods for the agents). 15% increase in FTEs is required to account for utilization.
24	Other Factors	4.1	SCE Modeling; Other factors included in calculation framework include probability of wait time, target service levels, seasonal factors, monthly variations, and several other factors. Combined, the additional factors produce a refined calculation of operational FTE requirements. The calculation follows Erlang C methodology, leveraging call center industry standards.
25	Total ENAs Required	35.0	Line 22 + Line 23 + Line 24; Rounded
ENA Staffing Levels			
27	ENA 1	13.3	Line 25 x 36.08% of ENAs are ENA 1
28	ENA 2	22.4	Line 25 x 63.92% of ENAs are ENA 2
Supervision and Support			
30	ENA 3	3.5	10:1 Ratio based on Line 25
31	Sr. Supervisor	2.3	15:1 Ratio based on Line 25
32	QA Specialist	2.5	14:1 Ratio based on Line 25

Sheet 2 of 3

SUPPLEMENTAL WORKPAPERS
 Customer Contact Center
 Increased NEM, CCA, and Credit Outbound Call Activities
 (SCE-03, Vol. 1)

Table III - Incremental Staffing Requirements

Line No.	Labor Category	FTEs (Rounded)	Annual Wage Rate (2022 \$000)	Total Forecast (2022 \$000)
33	SCE ENA 1	13.0	\$ 67	\$ 874
34	SCE ENA 2	22.0	78	1,714
35	SCE ENA 3	4.0	83	332
36	Business Operations Sr. Supervisor	2.0	103	206
37	Quality Assurance Specialist	3.0	76	229
38	Total			\$ 3,355

Sheet 3 of 3

Supplemental Workpaper
Community Choice Aggregation (CCA) Fees

CCA Volume Forecast Recorded Revenues (\$000s)	Recorded					Forecast At Current Rates					Proposed Rates	
	2018	2019	2020	2021	2022	2023	2024	2025	2024	2025	2024	2025
Number of CCAs	6	6	10	11	12	12	12	12	12	12	12	12
Number of SAs (EOY)	119,414	990,005	1,318,953	1,318,900	1,638,576	1,696,681	1,696,681	1,696,681	1,696,681	1,696,681	1,696,681	1,696,681
Number of SAs (EOY) net of Opt-out 6% rate	115,646	932,041	1,284,632	1,301,352	1,575,030	1,600,642	1,600,642	1,600,642	1,600,642	1,600,642	1,600,642	1,600,642
Number of Phase In	115,646	523,844	1,108,337	1,292,992	1,438,191	1,587,836	1,600,642	1,600,642	1,600,642	1,600,642	1,600,642	1,600,642
Number of SAs (Monthly)	3,768	58,464	34,321	17,548	83,496	96,039	96,039	96,039	96,039	96,039	96,039	96,039
Number of SA Opt-Outs	391	1,477	2,638	1,619	2,485	3,397,000	3,366,000	3,366,000	3,366,000	3,366,000	3,366,000	3,366,000
Revenues												
Assumptions:												

-Assuming no growth, and zero phase in for 2024 and beyond.
 -Volume data forecasts based on factors including number of CCA's, number of Service Accounts (after 6% Opt-out rate applied), and historical averages.

\$5,203,000
 \$5,210,000
~~\$5,475,000~~

\$18,463
 \$10,498
 \$154,276
 \$31,476

\$12.00
 \$0.62
 \$0.60
 \$0.60
 \$0.60
 \$0.60
 \$0.60

Line No.	Fee Description	Current Fees	Proposed Fees	Volume Forecast					Forecast At Current Rates					Proposed Rates			
				2023	2024	2025	2024	2025	2023	2024	2025	2024	2025	2024	2025		
1	CCA Establishment - CCA Service Establishment	\$ 228,000	CON	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	EDI Testing	T&M	CON	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	CCA Establishment - CCA Credit Establishment Fee	\$ 27,000	ELM	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Mass Enrollment - Per Event	\$ 2,055,000	CON	2	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Mass Enrollment - Per Service Account	\$ 4,400	CON	25,612,000	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Opt-Out Requests - Customer Contact Opt-out	\$ 4,600	CON	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Opt-Out Requests - Voice Response Unit (IVR) Opt-out	\$ 0.55	\$	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Opt-Out Requests - Internet Opt-out	\$ 0.47	\$	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Community Choice Aggregation Service Request (CCASR) - CCASR Fee	\$ 0.66	\$	30,607.71	30,607.71	30,607.71	30,607.71	30,607.71	30,607.71	30,607.71	30,607.71	30,607.71	30,607.71	30,607.71	30,607.71	30,607.71	30,607.71
10	Community Choice Aggregation Service Request (CCASR) - Customer Re-entry	\$ 0.47	\$	17,403.77	17,403.77	17,403.77	17,403.77	17,403.77	17,403.77	17,403.77	17,403.77	17,403.77	17,403.77	17,403.77	17,403.77	17,403.77	17,403.77
11	Community Choice Aggregation Service Request (CCASR) - Cancellation Fee	\$ 2.00	ELM	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Community Choice Aggregation Service Request (CCASR) - New Customer	\$ 2.30	\$	255,762.00	255,762.00	255,762.00	255,762.00	255,762.00	255,762.00	255,762.00	255,762.00	255,762.00	255,762.00	255,762.00	255,762.00	255,762.00	255,762.00
13	Community Choice Aggregation Service Request (CCASR) - Opt-out CCASR Fee	\$ 0.66	\$	52,181.00	52,181.00	52,181.00	52,181.00	52,181.00	52,181.00	52,181.00	52,181.00	52,181.00	52,181.00	52,181.00	52,181.00	52,181.00	52,181.00
14	Consolidated Bill Ready Billing Services - Additional Page Charge	\$ 7.00	ELM	144	144	144	144	144	144	144	144	144	144	144	144	144	144
15	CCA Non-Energy Billing Receivable Fee	\$ 9.00	ELM	144	144	144	144	144	144	144	144	144	144	144	144	144	144
16	CCA Termination of Service - Voluntary Termination Fee - Per Event	\$ 2,055,000	CON	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	CCA Termination of Service - Voluntary Termination Fee - Per Service Account	\$ 0.40	CON	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	CCA Termination of Service - Involuntary Service Change or Termination of CCA	T&M	CON	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	CCA Meter and Data Management Agent (MDMA) Fee (renamed)	\$ 0.04	\$	19,207.704	19,207.704	19,207.704	19,207.704	19,207.704	19,207.704	19,207.704	19,207.704	19,207.704	19,207.704	19,207.704	19,207.704	19,207.704	19,207.704
20	Special Services Request (rescoped fee)	T&M	CON	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Monthly Account Maintenance Fee - Per CCA (Fixed)	\$ 269.00	CON	144	144	144	144	144	144	144	144	144	144	144	144	144	144
22	Standard Phase In - Mass Enrollment Fee - Per Phase	\$ 2,055,000	CON	2	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Standard Phase In - Mass Enrollment Fee - Per Service Account	\$ 0.48	CON	49,210	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Special Requirements Data - Aggregate Annual Usage Report, Standard File	\$ 114,000	\$	12	12	12	12	12	12	12	12	12	12	12	12	12	12
25	Special Requirements Data - Monthly Energy Efficiency Participation Data Provided for	\$ 289,000	\$	12	12	12	12	12	12	12	12	12	12	12	12	12	12
26	Additional Information - Mapping of Rate Schedules by Rate Group	No Charge	No Charge	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	Additional Information - Mapping of Rate Schedules by Rate Group	No Charge	No Charge	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	Additional Information - Public Goods Charge - Residential Tier Data, Generation Revenue Information	No Charge	No Charge	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Aggregate Annual Usage Report (Section A Report) Fee	\$ 40.00	ELM	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Reposting of Usage Data Files Fee	\$ 41.00	ELM	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	EDI VAN Charge	\$ 0.05	\$	19,054.032	19,054.032	19,054.032	19,054.032	19,054.032	19,054.032	19,054.032	19,054.032	19,054.032	19,054.032	19,054.032	19,054.032	19,054.032	19,054.032
32	Additional Metering Related Services - Engineering Estimate or Job Design	\$ 58.00	CON	3	3	3	3	3	3	3	3	3	3	3	3	3	3
33	Additional Metering Related Services - Incomplete Trip Fee	\$ 101.00	CON	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34	Additional Metering Related Services - Pulse Adapter Equipment and Installation Charge	\$ 28.00	CON	16	16	16	16	16	16	16	16	16	16	16	16	16	16
35	Timing Charge DR Meter	\$ 190,000	CON	-	-	-	-	-	-	-	-	-	-	-	-	-	-
36	Customer Information Standardized Request (CISR) - CISR Base Processing Fee	\$ 9.00	\$	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00
37	Customer Information Standardized Request (CISR) - Usage Data Base Fee (Non-Interval) - Opt 1	\$ 9.00	\$	7.00	7.00	7.00	7.00	7.00	7.00	7.00	7.00	7.00	7.00	7.00	7.00	7.00	7.00
38	Customer Information Standardized Request (CISR) - Usage Data Base Fee (Interval) - Opt 3	\$ 15.00	\$	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00	9.00
39	CCA CSR Rate Change Request-Option 7	\$ 4.30	ELM	-	-	-	-	-	-	-	-	-	-	-	-	-	-
40	FSC Meter with Pulse Output Fee	\$ 454.00	CON	2	2	2	2	2	2	2	2	2	2	2	2	2	2
41	Meter Replacement Service Fee	\$ 234.00	CON	-	-	-	-	-	-	-	-	-	-	-	-	-	-
42	CCA Requested Opt-Out Fee	\$ 4.90	ELM	-	-	-	-	-	-	-	-	-	-	-	-	-	-

43	CCA Hourly Historical Usage Data (HUD) Report Per Event	\$	253,001	\$	241,000	12	12	12	\$	3,036	\$	3,036	\$	3,036	\$	3,036	\$	2,892						
44	CCA Account Assurance Fee	T&M				1	1	1	\$	300	\$	300	\$	300	\$	300	\$	300						
45	CCA Project Management Fee	T&M							\$		\$		\$		\$		\$							
46	Additional Metering Related Services - Third Party Un-Returned Meter Penalty Change	T&M							\$		\$		\$		\$		\$							
47	Additional Metering Related Services - Acceptance Testing of Customer-owned Meter	T&M							\$		\$		\$		\$		\$							
48	Additional Metering Related Services - Investigation and Scheduling Change	T&M							\$		\$		\$		\$		\$							
49	Additional Metering Related Services - Material Handling Change	T&M							\$		\$		\$		\$		\$							
50	Additional Metering Related Services - Dual Socket Adapter Device Change	T&M							\$		\$		\$		\$		\$							
51	CCA Monthly Account Maintenance Fee- per SA	T&M	0.04	\$	0.22	19,207,704	19,207,704	19,207,704	\$	768,308	\$	768,308	\$	768,308	\$	768,308	\$	4,274,202						
52	Meter Related Services	New							\$		\$		\$		\$		\$	5,770						
53	System Set Up and EDJ Testing	New							\$		\$		\$		\$		\$							
54	Enrollment & Reversion Project Fee	New							\$		\$		\$		\$		\$							
55	CCA Monthly Bank Fee per SA	New							\$		\$		\$		\$		\$							
56	T&M Time and Material	New			0.01			19,207,704	\$		\$		\$		\$		\$	249,845						
Total CCA Revenue Forecast															\$	3,397,000	\$	3,366,000	\$	3,366,000	\$	3,366,000	\$	5,733,000

3,999,648

4,006,661

\$5,475,000

\$5,210,000

\$5,203,000

0.21

Supplemental Workpaper
CCA Monthly Account Maintenance per SA
Community Choice Aggregation (CCA) Fees
(Nominal \$)

Line No.	Fee	Activity	Sub Activity	Occurrence per Month	Time	Unit	Cites	Rate/Unit	Cost per SA	Notes
1										
2		CCA Monthly Account Maintenance per SA								
3		CCA Assistance and Account Exception Processing - Customer Choice Services (CCS) Related								
4		BCD CCS Support Request: CCA Inquiries		1,405.00	7.10 mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0093	
5		CCA Final Bill Not Received		1,117.00	8.72 mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0090	
6		CCA Switch Failure		775.00	8.55 mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0062	
7		General Process Error Resolutions (PE)		921.00	12.23 mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0105	
8		CCA B14 Outbound Failure		168.00	11.70 mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0016	
9		CCA DROP Failure		84.00	4.25 mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0003	
10		Validating Rate		60.08	8.4 mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0005	
11		Missed Resend-Missing Usage		38.66	9.6-mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0005	
12		Missing Opt-Out		27.30	12.0 mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0003	
13		Opt Out Not Connecting		24.17	10.4 mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0002	
14		Reconciliation of Balances/Statements		23.17	14.3 mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0003	
15		CCA Account Exception Processing - Billing Related								
16		CCA Account Billing Current/Complete		2,585.00	23.33 mins		CS0935_P2_NE_RSO	\$ 1.24	\$ 0.0474	
17		CCA Account Billing Current/Complete		534.00	26.22 mins		CS0935_P2_NE_RSO	\$ 1.24	\$ 0.0110	
18		CCA Account Billing Current/Complete		504.60	11.20 mins		CS0935_P2_NE_RSO	\$ 1.24	\$ 0.0044	
19		CCA Billing Inquiries		380.00	42.65 mins		CS0935_P2_NE_RSO	\$ 1.24	\$ 0.0127	
20		CCASR Bill Reversal Failed		320.00	9.33 mins		CS0935_P2_NE_RSO	\$ 1.24	\$ 0.0023	
21		CCA Assistance and Account Exception Processing - Information Technology Related								
22		INDEX IT Data - Priority 3		960.00	2.40 mins		MSP	\$ 0.69	\$ 0.0010	
23		INDEX IT Data - Priority 4		510.00	6.40 mins		MSP	\$ 0.69	\$ 0.0014	
24		INDEX IT Data - Priority 4		282.00	168.60 mins		MSP	\$ 0.69	\$ 0.0210	
25		Operational Activities - Customer Call Center (CCC) Related								
26		CCS operational meetings - CCC Analyst		5.00	60.00 mins		BOP905_P2_NE_BCD_CCC	\$ 1.43	\$ 0.0003	
27		CCS operational meetings - CCC Project Manager		5.00	60.00 mins		PRJ910_R4_E_CCC	\$ 2.34	\$ 0.0004	
28		Operational Activities - Customer Choice Services (CCS) Related								
29		CCS operations - Sr. Specialists		1,656.66	60.00 mins		BOP905_P3_E	\$ 1.85	\$ 0.0024	
30		CCS operations - Specialists		101.90	60.00 mins		BOP905_P2_NE_BCD	\$ 1.46	\$ 0.0057	
31		CCS operations - Manager		30.40	60.00 mins		BOP900_M2_E_BCD	\$ 2.47	\$ 0.0029	
32		CCS operations - Advisor, Act Manager		24.40	60.00 mins		ADM910_P4_E	\$ 2.27	\$ 0.0021	
33		CCS operations - Project Manager		19.76	60.00 mins		PRJ910_R4_E	\$ 2.40	\$ 0.0042	
34		Operational Activities - Information Technology Related								
35		IT operations - MSP		8.00	60.00 mins		PRJ910_R5_E	\$ 2.89	\$ 0.0009	
36		IT operations - Advisor		392.00	60.00 mins		MSP	\$ 2.69	\$ 0.0402	
37		IT operations - Quality Advisor		182.00	60.00 mins		IT940_P4_E	\$ 0.69	\$ 0.0048	
38		IT operations - Sr. Advisor		38.00	60.00 mins		ITSCA	\$ 4.69	\$ 0.0024	
39		Operational Activities - Billing Related								
40		Billing operations - Billing Related		17.75	60.00 mins		ALL173_P5_E	\$ 2.80	\$ 0.0019	
41		Billing operations - Specialists		174.74	60.00 mins		CS0935_P2_NE_RSO	\$ 1.24	\$ 0.0082	
42		Billing operations - Advisor		10.40	60.00 mins		BOP905_P4_E	\$ 2.18	\$ 0.0009	
43		Billing operations - Manager		12.40	60.00 mins		BOP900_M2_E_RSO	\$ 2.42	\$ 0.0011	
44		Billing operations - Sr. Specialist		9.40	60.00 mins		BOP905_P3_E_RSO	\$ 1.81	\$ 0.0006	
45		Billing operations - Sr. Supervisor		10.40	60.00 mins		CS0935_S2_E	\$ 1.89	\$ 0.0007	
46		CCA Monthly Account Maintenance per SA Total							\$ 0.2324	
47		2023 Proposed Fee (Rounded)							\$ 0.22	
48		DESCRIPTION: This fee will apply on a monthly basis for each service account that is participating in a CCA's program. This fee is based on the incremental costs of managing and processing CCA transactions. This includes activities relating to any CCA inquiries, system exceptions, billing related exceptions, routine reporting, and routine operational work. CCA SA Estimated based on 2022 Service Accounts: 1,575,030.								
49										

0.0016
 0.0128
 0.69 0.0103
 2.11 0.0146
 2.35 0.0034
 0.2082 0.21

181.05

18

Appendix C

Other Information

**SCE-14, Vol. 01: Rebuttal Testimony on Customer Service Operations
Appendix C Other Information**

Other Information	PAGE(S)
Other Service Providers' Paper Bill Fees	C1
Excerpt of SCE's February 8, 2024 Report on CPA's Missing Usage Reconciliation	C2

Other Service Providers' Paper Bill Fees

The following is a list of companies that charge some sort of paper bill fee based on SCE's research as of March 2024.

Note the banks listed below either charge the fee per paper bill, or offer online overviews for free but charge the fee to customers for more detailed paper statements.

Company	Fee	Source (As of March 2024)
Telecom Companies		
AT&T	\$2.00	https://www.att.com/legal/terms.attPhoneFeeSchedule.html
Verizon	\$2.00	https://www.allbusiness.com/is-it-right-for-carriers-to-charge-for-paper-billing-12838325-1.html
T Mobile	\$1.50	https://www.t-mobile.com/support/account/whats-impacting-your-bill
Frontier Communications	\$2.99	https://beachcomber.news/content/finding-frontier's-newly-increased-pricing/scheme
Comporium Communications	\$2.00	https://www.wcnc.com/video/money/consumer/comporium-charging-fee-for-customers-to-get-paper-bills/275-8192114
Banking Industry		
Chase Bank	\$6.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
Bank of America	\$5.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
Capital One	\$5.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
Wells Fargo	\$5.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
Union Bank	\$3.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
Truist Bank	\$3.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
BMO Harris Bank	\$3.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
Santander Bank	\$3.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
Citizens Bank	\$2.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
PNC Bank	\$2.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
U.S. Bank	\$2.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
Regions Bank	\$2.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326
TD Bank	\$1.00	https://www.mybanktracker.com/checking/faq/paper-statement-fees-286326

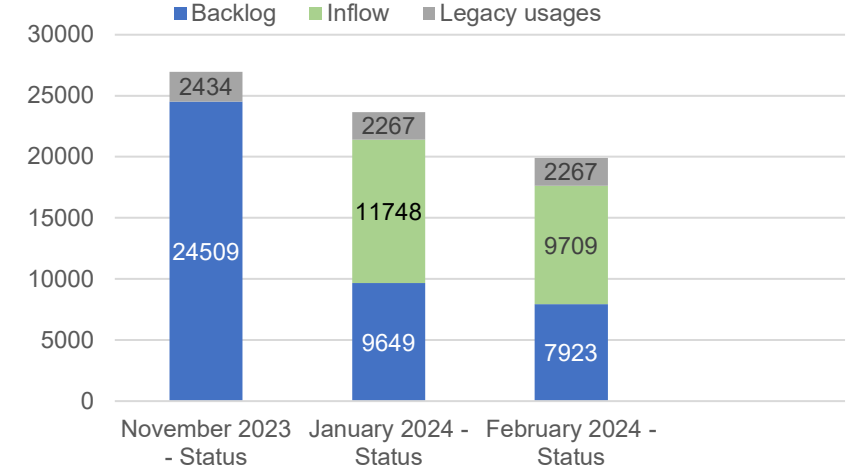
CPA's Missing Usage Reconciliation –Reported on 02.08.24

Issue Category	Action Item / Assigned to	Current Status	Count by Bill period
Latest usages already shared EDI810 Charges already posted Bill period mismatch – start or end date issues, usages shared Bill period mismatch – start or end date issues, charges posted full or partial etc.	Calpine	Calpine analysis in progress	1821
LDC Combination does exist, but <u>never</u> with CPA for the given Bill period LDC Combination does exist but not with CPA for the given bill period LDC Combination does not exist	Calpine	Calpine analysis in progress	1607
Bill Period Mismatch - start date, end date not matching Bill Period Mismatch – only End date matching , Bili. doc reversed Bill document already created (EDI REFID to be provided) Delayed Billing – SCE Analysis	SCE	SCE Analysis /fix in progress	7923
SCE New –Inflow of CPA's Missing usages	SCE	SCE Analysis/fix in Progress	9709 (Inflow)
Bill Period belongs to Legacy	SCE & Calpine	No Action needed by IT	2267

Aging / Number of days delayed(Count by Bill Period)

Assigned group	1-30 days	31-60 days	61-90 Days	90-180 days	> 180 days
SCE Backlog analysis	0	0	0	1454	6468
SCE-New Inflow	0	0	6309	2944	456
Calpine	0	0	892	455	2081
Total count by Bill period	0	0	7201	4853	9005

CPA's Missing usage status



Bill Period Count by Aging Group

