Docket No.: A.23-06-001

Exhibit No.: CalCCA-02

Date: September 26, 2023

Sponsor/Witness: Eric Lee (SCE)

EXHIBIT CALCCA-02

SCE Responses to Certain Data Requests Issued in Lieu of Cross Examination – Public

September 26, 2023

Southern California Edison
A.23-06-001 – 2024 ERRA Forecast

DATA REQUEST SET CalCCA-SCE-005

To: CalCCA
Prepared by: Eric Lee
Job Title: Sr. Advisor
Received Date: 9/14/2023

Response Date: 9/20/2023

Question 05.01 :
Referring to SCE-05C at 3:14 – 4:18: For a hypothetical customer that received bundled service from 2011 to 2019, and then departed bundled service in July 2019, please respond to the following:

a. Admit that this customer paid a share of the market value of RPS attributes generated from 2011 through 2018. If deny, please explain.
b. Admit that this customer paid a share of the market value of RECs banked from 2011 through 2018. If deny, please explain.
c. Admit that this customer did not receive the credit paid to departing load customers for the market value of RECs banked from 2011 – 2018. If deny, please explain.
d. Admit that RECs banked from 2011 – 2018, and remaining in the bank in 2019, were not used to meet RPS compliance requirements related to serving this customer's load. If deny, please explain.
e. Admit that once this customer has departed from bundled service, SCE has no RPS compliance requirement related to serving this customer's load. If deny, please explain.
f. Admit that all of the RECs banked from 2011 through 2018 can be used by SCE to meet RPS compliance requirements for remaining bundled customers in 2019 and beyond, after this customer no longer receives bundled service. If deny, please explain.

Response to Question 05.01 :

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Public Disclosure Restricted.

a. SCE admits; however, it is also true that this customer did not fully pay for the cost-shift associated with RECs generated in 2018 that was recovered in bundled service generation rates in 2019 because the pre-2019 PCIA methodology did not include a true-up of the RPS attributes. SCE denies in part for customers that departed prior to 2019 because they received benefits from these banked RECs and bypassed some of the costs of the pre-2019 banked RECs.
b. SCE admits; however, it is also true that this customer did not fully pay for the cost-shift associated with banked RECs generated in 2018 that was recovered in bundled service generation rates in 2019 because the pre-2019 PCIA methodology did not include a true-up of the RPS attributes.
c. SCE admits that this customer did not receive the benefit paid to departing load customers in

2011-2017. SCE denies this customer did not receive benefit applicable for RECs generated and banked in 2018 because the customer avoided a portion of the cost-shift associated with those banked RECs that was recovered in bundled customer rates in 2019.

d. SCE admits.
e. SCE admits provided the customer never returns to bundled service. SCE denies if the customer returns to bundled service.

[redacted]

Southern California Edison
A.23-06-001 – 2024 ERRA Forecast

DATA REQUEST SET CalCCA-SCE-005

To: CalCCA
Prepared by: Eric Lee
Job Title: Sr. Advisor
Received Date: 9/14/2023

Response Date: 9/20/2023

Question 05.02:
Referring to SCE-05C at 3:14 – 4:18: Please explain the extent to which SCE agrees that a higher proportion of its customers received bundled service in 2011 than will receive bundled service in either 2023 or 2024?

Response to Question 05.02:
SCE agrees that a higher proportion of its customers received bundled service in 2011 than will (or are forecast to) receive bundled service in 2023 or 2024 based on load.

Southern California Edison
A.23-06-001 – 2024 ERRA Forecast

DATA REQUEST SET CalCCA-SCE-005

To: CalCCA
Prepared by: Eric Lee
Job Title: Sr. Advisor
Received Date: 9/14/2023

Response Date: 9/20/2023

Question 05.03:
Referring to Confidential_Appendix B_PCIA Workpapers (2024), tab 'Billing Determinants by Vintage': Please explain the extent to which SCE agrees that in each year from 2011 through 2023, additional customers have migrated from bundled service to unbundled service (i.e., constituted new departed load)?

Response to Question 05.03:
SCE agrees that from 2011 through 2023, additional customers (which SCE is interpreting to mean actual number of customer accounts in its billing system) have migrated from bundled service to unbundled service. During that same timeframe, some customer accounts have also reverted back to bundled service.

Southern California Edison
A.23-06-001 – 2024 ERRA Forecast

DATA REQUEST SET CalCCA-SCE-005

To: CalCCA
Prepared by: Eric Lee
Job Title: Sr. Advisor
Received Date: 9/14/2023

Response Date: 9/20/2023

Question 05.04:
Referring to SCE-05C at 3:14 – 4:18: Admit that each bundled customer in a given year pays only for a share of the RECs generated and banked in that year. If deny, please explain.

Response to Question 05.04:
SCE finds the question ambiguous and confusing. The testimony referenced in the question addresses pre-2019 banked RECs. Under the pre-2019 PCIA methodology, bundled service customers paid for 100 percent of the RECs generated and banked in a given year. In that same given year, bundled service customers also paid for the cost-shift associated with the prior year's generated and banked RECs – meaning that they did not *only* pay for *current* year RECs. If the question is asking if each individual bundled service customer account paid for the cost of the RECs described in the preceding two sentences based on its individual consumption in the given year, then the answer is yes because the bundled rates are set to recover the revenue requirement from the entire bundled service population sales forecast for that given year.

Southern California Edison
A.23-06-001 – 2024 ERRA Forecast

DATA REQUEST SET CalCCA-SCE-005

To: CalCCA
Prepared by: Eric Lee
Job Title: Sr. Advisor
Received Date: 9/14/2023

Response Date: 9/20/2023

Question 05.05:
Referring to SCE-05C at 3:14 – 4:18: Admit that the number of bundled service customers that paid for RECs each year from 2011-2018 is greater than the number of bundled customers SCE served each year in 2019 and later. If deny, please explain.

Response to Question 05.05:
Assuming the question is referring to the actual number of customer accounts in its billing system, SCE admits.

Southern California Edison
A.23-06-001 – 2024 ERRA Forecast

DATA REQUEST SET C a l C C A - S C E - 0 0 5

To: CalCCA
Prepared by: Eric Lee
Job Title: Sr. Advisor
Received Date: 9/14/2023

Response Date: 9/20/2023

Question 05.06:
Referring to SCE-05C at 3:14 – 4:18: Admit that a customer who was bundled in 2018, but is now a departed load customer, paid for a proportionate share of the RECs banked during 2018. If deny, please explain.

Response to Question 05.06:
SCE admits that a January through December 2018 bundled service customer paid for RECs banked in 2018; however, if that same customer departed in January 2019, they would not have paid for any cost-shift associated with those banked RECs that was recovered in bundled generation rates in 2019, and would not have paid for some of that cost-shift if they departed in any other month in 2019.

Southern California Edison
A.23-06-001 – 2024 ERRA Forecast

DATA REQUEST SET CalCCA-SCE-005

To: CalCCA
Prepared by: Eric Lee
Job Title: Sr. Advisor
Received Date: 9/14/2023

Response Date: 9/20/2023

Question 05.09:
Referring to SCE-05C at 3:14 – 4:18: Please respond to the following:

a. Please quantify the number of RECs deposited in the bank during 2018.
b. Please provide the RPS Market Price Benchmark price paid by bundled customers to purchase the RPS attributes generated in 2018.
c. Please quantify the actual annual retail sales MWh to customers in SCE's service territory during 2018 that
1) received bundled service from SCE, 2) received generation service from a CCA, and 3) received generation service from a direct access provider.
d. Please quantify the actual annual retail sales MWh to customers in SCE's service territory during 2022 that
1) received bundled service from SCE, 2) received generation service from a CCA, and 3) received generation service from a direct access provider.
e. Please quantify the forecast annual retail sales MWh to customers in SCE's service territory during 2024 projected to 1) receive bundled service from SCE, 2)generation service from a CCA, and 3) receive generation service from a direct access provider.

Response to Question 05.09:

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a. As shown in Table 3 in CalCCA's testimony, which was based on SCE's response to CalCCA's data request 2.04, [redacted]

b. In 2018, the RPS Market Price Benchmark (or RPS "Adder") used in the calculation of PCIA rates was $25.11/MWh. SCE calculated this by subtracting the load weighted average price of $32.37/MWh from the weighted average renewable benchmark of $57.48/MWh to isolate the weighted average renewable premium.

   SCE agrees that under the PCIA methodology in place when the 2018 ERRA Forecast rates were set resulted in SCE's bundled service customers purchasing all the RECs generated in 2018 at the 2018 RPS Market Price Benchmark. Any cost-shift associated with the use of this benchmark was recovered via bundled generation rates in 2019 because there was no true-up in place for the renewable value in 2018.

c.

Description	2018 Load in 2020 ERRA Forecast Application (GWh)
Direct Access Sales (@meter)	11,160,000
CCA Sales (@meter)	2,166,000
Bundled Service Sales (@meter)	71,950,000

d.

Description	2022 Load in 2024 ERRA Forecast Application (MWh)
Direct Access Sales (@meter)	12,467,000
CCA Sales (@meter)	16,017,000
Bundled Service Sales (@meter)	57,442,000

e.

Description	2024 Load Forecast in 2024 ERRA Forecast Application (MWh)
Direct Access Sales (@meter)	[redacted]
CCA Sales (@meter)	[redacted]
Bundled Service Sales (@meter)	[redacted]

Southern California Edison
A.23-06-001 – 2024 ERRA Forecast

DATA REQUEST SET C a l C C A - S C E - 0 0 5

To: CalCCA
Prepared by: Simei He
Job Title: Accounting Advisor
Received Date: 9/14/2023

Response Date: 9/20/2023

Question 05.10:
Referring to SCE-05C at 6:10-24: Please confirm that SCE used post- 2018 banked RECs to meet the annual Retained RPS requirement for 2021, 2022, and 2023. If not confirmed, please explain.

Response to Question 05.10:

SCE objects to this question because it is outside the scope of this proceeding. The question involves recorded, not forecast, costs, which are reviewed in SCE's annual ERRA Compliance applications. Without waiving SCE's objection, SCE responds as follows.

Confirmed, as explained in SCE's Rebuttal testimony (*see* SCE-05C at p. 6, lines 20-24).

Southern California Edison
A.23-06-001 – 2024 ERRA Forecast

DATA REQUEST SET CalCCA-SCE-005

To: CalCCA
Prepared by: Simei He
Job Title: Accounting Advisor
Received Date: 9/14/2023

Response Date: 9/20/2023

Question 05.11:
Referring to SCE-05C at 6:10-24: Please provide all documentation, including journal entries, demonstrating that SCE credited PABA in 2021, 2022, and 2023 for the value of post-2018 banked RECs used for Retained RPS.

Response to Question 05.11:

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SCE objects to this question because it is outside the scope of this proceeding. The question involves recorded, not forecast, costs, which are reviewed in SCE's annual ERRA Compliance applications. Without waiving SCE's objection, SCE responds as follows.

SCE is providing copies of its 12/31/2021, 12/31/2022 and 8/31/2023 monthly report to the CPUC (all of which have also been previously provided to Mr. Brian Dickman, the reviewing representative of CalCCA), which demonstrates that SCE's full bundled RPS compliance requirement has been paid for at the RPS Adder market price benchmark and credited to either the PABA or the BMNBCBA. Please see the product calculation at:

- "2021 RPS CPUC Report" tab: see cell C26.
- "2022 RPS CPUC Report" tab: see cell C26.
- "YTD Aug2023 RPS CPUC Report" tab: see cell C36.

Southern California Edison
A.23-06-001 – 2024 ERRA Forecast

DATA REQUEST SET CalCCA-SCE-005

To: CalCCA
Prepared by: Eric Lee
Job Title: Sr. Advisor
Received Date: 9/14/2023

Response Date: 9/20/2023

Question 05.12:
Referring to SCE-05C at 6:10-24:
a. Confirm that there are insufficient post-2018 banked RECs to meet the 2024 Retained RPS requirement. If not confirmed please explain.
b. Please explain whether SCE will continue to use post-2018 banked RECs to count toward 2024 Retained RPS until the post-2018 banked RECs are exhausted, and then, at that point, use pre-2019 RECs to count toward the remaining Retained RPS requirement? If not, why not?

Response to Question 05.12:

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[redacted]