

Docket No. A.24-03-019

Exhibit No. _____

Date January 8, 2025

Witness Mary Neal

**DIRECT TESTIMONY OF MARY NEAL
ON BEHALF OF THE WESTERN MANUFACTURED HOUSING COMMUNITIES
ASSOCIATION IN PHASE 2 OF SOUTHERN CALIFORNIA EDISON'S 2025
GENERAL RATE CASE
APPLICATION 24-03-019**

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I. Introduction and Summary of Testimony

Q. Please state your name, position and business address.

A. My name is Mary Neal. I am a Senior Project Manager at MRW & Associates, LLC (MRW). My business address is 1736 Franklin Street, Suite 700, Oakland California.

Q. Please describe you background, experience and expertise.

A. I have over ten years of experience in energy consulting, advising electric and natural gas industry clients on a wide array of regulatory, policy, and capital planning issues. I have prepared utility cost allocation, revenue requirement, and rate design models and have extensive experience modeling wholesale power markets for price forecasting and asset valuation. Prior to my consulting role, I was a combustion engineer for Solar Turbines, Inc. I have a B.S. in Mechanical Engineering from UC Davis and a M.A. in Energy and Environmental Analysis from Boston University.

Q. Have you previously testified as an expert witness?

A. I previously testified before the California Public Utilities Commission multiple times since 2019, including the past Southern California Edison (SCE) General Rate Case (GRC) Phase 2 proceeding (A.20-10-012). I have also submitted testimony in other jurisdictions, namely Wisconsin, Vermont, New York, and Nova Scotia. My resumé and a full list of my sworn testimony is provided in Attachment A.

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony is to discuss the appropriate level of master meter discount for manufactured housing communities that take service in the SCE service territory, how this discount will be impacted by Decision (D.)24-05-028 that implements residential

1 fixed charges, and appropriate marketing, education, and outreach efforts to submetered
2 manufactured housing communities regarding residential fixed charges.
3

4 **Q. On whose behalf are you testifying?**

5 A. I am testifying on behalf of the Western Manufactured Housing Communities
6 Association (WMA).
7

8 **Q. Please describe WMA.**

9 A. WMA represents the owners/operators of approximately 1,600 manufactured housing
10 communities, which contain about 186,059 mobilehome spaces, distributed throughout
11 California. In total statewide, there are approximately 4,500 manufactured housing
12 communities, with roughly 387,812 mobilehome spaces..¹ These communities provide
13 Californians the opportunity to own their home at low cost compared to traditional
14 foundation-constructed housing, and the flexibility to move their homes around the state.
15 Manufactured housing, or “mobilehomes,” fill an important position in the range of
16 housing options available to California.
17

18 The majority of these communities in the state of California are “master metered.”
19 Utility service, such as electricity and natural gas, is delivered to a single meter at the
20 community, and the service is then delivered to end-users at the individual mobilehome
21 spaces through a private distribution system, which is most often separately
22 “submetered.” About 60 percent of these communities are master metered within the
23 service territories of the four largest utilities, according to utilities’ filings.
24

25 **Q. What are the WMA's interests in this proceeding?**

26 A. WMA is sponsoring testimony in this proceeding to address issues related to SCE’s
27 proposed master meter discount for manufactured home communities that take service as
28 master meter customers under SCE rate Schedule DMS-2.
29

¹ California Housing and Community Development, February 26, 2021.

1 **Q. How is your testimony organized?**

2 A. In Section II, I provide a brief overview of the master meter discount and summarize
3 SCE's proposed master meter discount. I also introduce the impact residential fixed
4 charges will have on this discount, which was overlooked in SCE's Application in this
5 proceeding. In Section III, I provide some recommendations to clarify SCE's master
6 meter discount proposal so it can be properly adopted in the final decision in this
7 proceeding. In Section IV, I discuss appropriate marketing, education and outreach
8 regarding residential fixed charges for submetered mobilehome parks (MHP). Section V
9 concludes my testimony.
10

11 **Q. Please summarize your recommendations.**

12 A. I recommend:

- 13 • The Commission adopt SCE's proposed cost-of-service and line loss components of the
14 master meter discount.
- 15 • The Commission adopt SCE's proposed Diversity Benefit Adjustment and Basic Charge
16 components of the master meter discount, subject to the clarifications offered regarding
17 the implementation of income-graduated residential fixed charges ordered in D.24-05-
18 028 discussed in this testimony, namely that:
 - 19 ○ The final decision in this proceeding should include adoption of a methodology
20 for calculating master meter discounts subsequent to the implementation of the
21 aforementioned income-graduated residential fixed charges.
 - 22 ○ SCE should clarify in its rebuttal testimony in this proceeding that although the
23 cost-of-service and line loss components of the discount do not change with the
24 implementation of new fixed charges, the total master meter discount is impacted
25 by changes to the DBA and the Basic Charge components.
 - 26 ○ SCE should also clarify the total master meter discount does vary by fixed charge
27 rate tier because the Basic Charge component varies by rate tier.
 - 28 ○ SCE should also clarify that by subtracting the new fixed charge of each
29 submetered tenant from the master meter discount, the same fixed charges should
30 not also appear as a charge on the DMS-2 customer bill.

- SCE should convert residential fixed charge monthly values to daily values by dividing by 30.4375.
- Regarding marketing, education, and outreach about income-graduated residential fixed charges:
 - SCE provide a written communication to all DMS-2 customers in advance of the fixed charge implementation explaining the three tiers of charges and how such charges will be billed as a reduction to the master meter discount.
 - SCE provide a written communication to all DMS-2 customers SCE identifies as having DRAH units and include the contact information at SCE for DMS-2 customers to contest the defaulted status and attest to the number DRAH units at the property.
 - DMS-2 bills provide the number of units in each fixed charge tier, including a separate breakdown of the number of units in Tier 2 that are FERA and/or DRAH.
 - To supplement outreach to submetered tenants, SCE provide a form letter that can be posted at each DMS-2 property explaining the new fixed charges with messaging consistent with other SCE customer outreach.

II. Background and Summary of SCE's Master Meter Proposal

Q. What is the purpose of this section of your testimony?

A. In this section, I introduce the master meter discount, summarize SCE's proposal for the master meter discount in this proceeding, and discuss how residential fixed charges will impact master meter discounts.

A. Introduction to the Master Meter Discount

Q. Please describe the master meter discount.

1 A. California Public Utilities Code Section (hereinafter Section or §) 739.5(a)² requires that
2 submetered community residents pay for electric and natural gas service at the
3 “applicable” rate charged by the investor-owned utility which would have otherwise
4 served those residents. This statute also requires the Commission to establish a master
5 meter rate that includes a “sufficient differential to cover the reasonable average costs to
6 master meter customers of providing submetered service.” Commission decisions have
7 established the principle that this “differential” is the exclusive method of recovering
8 submeter system costs as defined by the Commission in D.04-04-043. As a result, the
9 community owners must rely entirely on the due consideration of the Commission to
10 maintain the viability of their private energy utility systems.

11
12 **Q. What purpose does this discount serve for master meter customers?**

13 A. The MHP owner is supposed to be at least on rough parity with the utility in collecting
14 adequate revenues to maintain the community’s private system, and with community
15 owners who have directly-metered service from the utilities. This arises from the
16 residential indifference test. Master metered MHP owners are specifically prohibited
17 under Section 739.5 from charging a rate different from that of the utility. The discount is
18 the only source of revenue for a master metered mobilehome community owner to cover
19 the costs of serving submetered tenants up to the tenants’ meters for the defined utility
20 system.³ The community’s management does not set its own prices in competition with
21 the utility or other providers. This restricts master meter customers to acting as surrogates
22 for the utility in providing distribution service at a comparable rate—the mobilehome
23 community owner is prevented from entering into competition with the utility. Section
24 739.5(a) states the utility’s costs of comparable service represent a ceiling on

² All code references are to the Public Utilities Code unless otherwise noted.

³ D.95-02-090 and D.95-08-056 specified the general requirement. D.04-04-043 completed the requirement laid down in D.95-08-056 to define what is the “utility system.” The latter decision clearly delineated the boundaries of the utility system to correspond with the responsibilities of the serving utility and what costs are recovered through the submeter discount and what costs can be recovered through rents.

1 compensation for community owners, while the costs for community owners only serve
2 as a floor when the owners can show that the differential is insufficient.⁴
3

4 **B. SCE's Proposal in this Proceeding**

5 **Q. Please describe SCE's proposal for the establishment of the electric master meter**
6 **discount in this proceeding.**

7 A. As in past GRCs, SCE proposes a master meter discount that is a combination of four
8 values, each defined below:

- 9 • **Cost of Service:** The estimated cost of equipment and expenses SCE avoids by not
10 providing direct service to submetered tenants.⁵ SCE uses its marginal customer cost
11 study as the basis for this value using the rental method.⁶
- 12 • **Diversity Benefit Adjustment (DBA):** Adjusts to account for the differences in load
13 diversity of the submetered tenants and the master meter. This is a result of SCE's
14 tiered rate structure. The usage billed at the lower, Tier 1 rate for the master meter
15 will not always equal the sum of the Tier 1 usages of the individual submetered
16 tenants.⁷ The DBA is intended to adjust for this difference to correct the inequity in
17 the billing of submetered tenants.⁸ This value decreases the final master meter
18 discount.
- 19 • **Line Loss Adjustment:** Adjusts for the fact that the electricity purchased by the
20 MHP at the master meter is greater than the metered demand at the tenant sub-meters
21 due to line losses. This value increases the final master meter discount.
22
23

⁴ Neither the law nor the Commission has specified a reasonable means for community owners to show how the discount is insufficient.

⁵ Exhibit SCE-04A, Appendix E, pages E-6 to E-7.

⁶ Exhibit SCE-04A, Appendix E, page E-7.

⁷ Exhibit SCE-04A, Appendix E, page E-3.

⁸ D.86-12-091, p. 35 per Exhibit SCE-04A, Appendix E, page E-3.

- **Basic Charge:** This is the daily fixed charge included in SCE Schedule D rates for domestic customers. Because the MHP operator will collect this basic charge from each tenant, but only owes one basic charge to SCE for its master meter bill, the discount value is reduced by this amount.

Q. What is SCE's proposed DMS-2 master meter discount as presented in its amended testimony?

A. SCE proposes to increase the master meter discount from \$0.201/space/day to \$0.329/space/day (equivalent to \$6.12/space/month to \$10.01/space/month), a 64% increase.⁹

Q. Why has SCE proposed to increase the discount?

A. The increase to the discount is a combination of a lower DBA and higher Cost of Service component, as shown in Table 1. SCE proposes to keep the Line Loss Adjustment at the same level. Basic Charges are also assumed not to change, however they will be updated to reflect the imposition of new residential fixed charges as discussed in the next section of this testimony.

Table 1. Comparison of current and SCE-proposed MHP master meter discounts. All values in \$/MHP space/month, except column E, which is \$/MHP space/day.¹⁰

	A	B	C	D	A-B+C-D	E
	Cost of Service	Diversity Benefit Adjustment (DBA)	Line Loss Adjustment	Basic Charge	Net Discount	Daily Equivalent
SCE Proposal	\$12.78	\$2.22	\$0.18	\$0.73	\$10.01	\$0.329
Current	\$9.22	\$2.56	\$0.18	\$0.73	\$6.12	\$0.201

⁹ Exhibit SCE-04A, Appendix E, Table E-1, page E-8.

¹⁰ *Ibid.* Daily values are converted to monthly values by multiplying by 30.4375.

C. Impact of Residential Fixed Charges

Q. Please summarize the residential fixed charges ordered by the Commission in D.24-05-028.

A. The Commission adopted residential fixed charges in response to Assembly Bill (“AB”) 205, which directed implementation of income-graduated fixed charges.¹¹ In D.24-05-028, the Commission ordered a phased approach to fixed charge implementation, which orders charges initially in three tiers:¹²

- Tier 1: Customers enrolled in the California Alternate Rates for Energy (“CARE”) program automatically pay the lowest discounted fixed amount (approximately \$6 per month).
- Tier 2: Customers enrolled in the Family Electric Rate Assistance (“FERA”) program or who live in affordable housing restricted to residents with incomes at or below 80 percent of Area Median Income automatically pay a discounted fixed amount (approximately \$12 per month).
- Tier 3: All other customers will pay a fixed amount of \$24.15 per month.

These charges will apply to master-metered rates with submetering,¹³ including SCE’s schedule DMS-2. SCE will implement these charges in the fourth quarter of 2025.¹⁴

Q. Did SCE present the impact of the fixed charge on the master meter discount in its Amended Testimony in this proceeding?

A. No. However, WMA conducted discovery on this topic and presents the results of SCE’s responses here for inclusion in the record and proper adjudication in this proceeding.

Q. How will these new charges impact the calculation of the master meter discount?

¹¹ D.24-05-028, p. 2.

¹² D.24-05-028, pp. 3-4.

¹³ D.24-05-028, p. 86.

¹⁴ D.24-05-028, p. 3.

A. The new fixed charges impact two of the four components of the master meter discount. First, the Basic Charge increases from its current low level of approximately \$0.73/month to a range of \$6.00-\$24.15/month depending on the tier. Second, the introduction of the fixed charge lowers volumetric rates and also impacts the DBA. Based on data from SCE, the DBA will be reduced to \$1.73/month.¹⁵ The table below summarizes the impact of these changes for each tier of fixed charge. As the table shows, for Tier 2 and Tier 3 fixed charges, the master meter discount becomes a charge, i.e. the sign of the master meter discount in the table changes from a positive to negative value.

Table 2. Impact of residential fixed charges on master meter discount. All values in \$/MHP space/month, except column E, which is \$/MHP space/day.¹⁶

	A	B	C	D	A-B+C-D	E
	Cost of Service	Diversity Benefit Adjustment (DBA)	Line Loss Adjustment	Basic Charge	Net Discount	Daily Equivalent
Before Fixed Charge Increase						
SCE Proposal	\$12.78	\$2.22	\$0.18	\$0.73	\$10.01	\$0.329
After Fixed Charge Increase						
Tier 1	\$12.78	\$1.73	\$0.18	\$6.00	\$5.24	\$0.172
Tier 2	\$12.78	\$1.73	\$0.18	\$12.08	-\$0.85	-\$0.028
Tier 3	\$12.78	\$1.73	\$0.18	\$24.14	-\$12.91	-\$0.424

Q. Does the change of the master meter discount to a charge on a DMS-2 customer bill still allow a DMS-2 customer to collect revenues to pay for the costs of their utilities behind the master meter?

A. Yes. Each submetered customer will be assessed the fixed charge and the MHP owner/operator will keep the difference between the fixed charge amount the submetered tenant pays and the amount paid to SCE in the master meter “discount” that has now

¹⁵ SCE Response to WMA-SCE-005 Q1.

¹⁶ SCE Response to WMA-SCE-006 Q1. Daily values are converted to monthly values by multiplying by 30.4375.

1 become a charge.¹⁷ This approach, however, is contingent on SCE appropriately
2 accounting for the fixed charge tier of each submetered customer on schedule DMS-2,
3 which is discussed further in the next section of this testimony.

4 **III. Recommendations Regarding SCE's Proposed Master** 5 **Meter Discount**

6 **Q. Do you accept SCE's proposed cost of service and line loss components of the master**
7 **meter discount?**

8 A. Yes. An important change to SCE's methodology in this GRC Phase 2 is that it uses
9 single-family home costs as the basis for the cost of service component of the discount¹⁸
10 when in the past it had used the cost of service for apartment buildings. Because
11 mobilehomes are detached homes, the costs to serve them better resemble single-family
12 detached homes than apartment buildings. I also accept the proposed line loss adjustment,
13 which SCE proposes to keep at the same level as the previous GRC.

15 **Q. Do you accept SCE's proposal for the other two components of the master meter**
16 **discount, namely the DBA and Basic Charge?**

17 A. Yes, subject to some clarifications to account for the upcoming implementation of
18 residential income-graduated fixed charges. As discussed in more detail below, I make
19 recommendations on the following issues: (a) appropriate adjudication of the method for
20 accounting for changes in the master meter discount due to the implementation of
21 residential income-graduated fixed charges; (b) clarification of the record on how SCE
22 proposes to bill master meter fixed charges (c) clarifying the correct way to convert
23 between fixed charge monthly and daily values for calculating the master meter discount;
24 and (d) SCE's proposal to default all non-CARE submetered customers to Tier 2 fixed
25 charges.

¹⁷ SCE Response to WMA-SCE-004 Q2a.

¹⁸ Exhibit SCE-04A, Appendix E, page E-3.

1 **A. Adjudication of the Impact of Residential Fixed Charges on Master**
2 **Meter Discount**

3 **Q. You mentioned that SCE did not present testimony on the impact of new income-**
4 **graduated residential fixed charges on the master meter discount. Has SCE justified**
5 **this?**

6 A. No. It appears to be an oversight by SCE because as discussed earlier, SCE plans to
7 implement income-graduated fixed charges in the fourth quarter of 2025, certainly within
8 the window of this GRC Phase 2 proceeding.

9
10 **Q. What do you recommend regarding this issue?**

11 A. I recommend the Commission in its final decision in this proceeding includes adoption of
12 a methodology for calculating master meter discounts subsequent to the implementation
13 of the residential fixed charges ordered in D.24-05-028. I summarized SCE's proposal for
14 this methodology in the previous section of my testimony.

15 **B. Clarification of the Record on SCE's Master Meter Discount**
16 **Proposal**

17 **Q. In the previous section of your testimony, you summarized SCE's master meter**
18 **discount proposal post implementation of new residential fixed charges based on**
19 **SCE responses to data requests. Are all SCE data request responses on this topic**
20 **consistent with your testimony as presented?**

21 A. No. SCE makes many confusing statements in responses to data requests that new
22 residential fixed charges will not impact the master meter discount because the discount
23 is based on marginal costs and also stating that the master meter discount does not
24 depend on the fixed charge rate tier.¹⁹

25
26

¹⁹ SCE Responses to WMA-SCE-002, Q1; WMA-SCE-004, Q2; WMA-SCE-007, Q1b; WMA-SCE-007, Q1c.

1 **Q. How do you respond?**

2 A. SCE appears to conflating the cost of service component of the master meter discount,
3 which is based on marginal costs, and the *total* master meter discount, which is the
4 summation of four different components as described in Section II.B of my testimony.
5 SCE should clarify in its rebuttal testimony in this proceeding that although the cost of
6 service and line loss components of the discount do not change with the implementation
7 of new fixed charges, the total master meter discount is impacted by changes to the DBA
8 and the Basic Charge components.

9
10 SCE should also clarify the *total* master meter discount does vary by fixed charge rate
11 tier because the Basic Charge component varies by rate tier. Finally, SCE should also
12 clarify that by subtracting the new fixed charge of each submetered tenant from the
13 master meter discount, the same fixed charges should not also appear as a charge on the
14 DMS-2 customer bill. Doing so would double bill DMS-2 customers for the fixed
15 charges.

16 **C. Conversion Between Monthly and Daily Fixed Charge Values**

17 **Q. SCE's tariff presents master meter discounts as daily values whereas residential**
18 **fixed charges in D.24-05-028 are presented as monthly values. How does SCE**
19 **propose to convert fixed charge monthly values to daily values for purposes of**
20 **calculating the master meter discount?**

21 A. It is not entirely clear. In response to a data request, SCE originally converted the
22 monthly fixed charges in D.24-05-028 by dividing by 30 days.²⁰ But this ignores the fact
23 that not all months have 30 days. In a subsequent data request, WMA suggested a better
24 way to convert the values would be to divide by 30.417 (equal to 365/12), which is also
25 consistent with how other utilities convert between daily and monthly values for
26 calculating the master meter discount. However, in response to the data request, SCE

²⁰ SCE Response to WMA-SCE-005, Q1.

1 instead divided the monthly values by 30.4375 (equal to 1461/48) to account for leap
2 year.²¹

3
4 **Q. What method do you recommend for performing the numerical conversion?**

5 A. I accept the method SCE presented in which monthly values are divided by 30.4375. All
6 tables presented in my testimony use this conversion method. I recommend the final
7 decision in this proceeding adopt this method of conversion.

8 **IV. Marketing, Education, and Outreach For Fixed**
9 **Residential Charges and Associated Changes to Master**
10 **Meter Discount**

11 **Q. Please provide background on marketing, education, and outreach (“ME&O”) for**
12 **DMS-2 customers facing changes to the master meter discount after implementation**
13 **of income-graduated fixed charges.**

14 A. As indicated earlier in this testimony, SCE did not provide testimony on changes to the
15 master meter discount due to income-graduated fixed charges, which meant there was no
16 discussion of ME&O on this topic. An ME&O plan was filed as an attachment to advice
17 letter 5358-E, but this plan did not discuss master meter discount changes or any specific
18 outreach to DMS-2 customers. Therefore, WMA is making some recommendations
19 regarding ME&O here for adjudication in this proceeding.²²

20
21 **Q. What general concerns do you have regarding ME&O for residential fixed charges**
22 **and associated master meter discount changes?**

23 A. I am concerned about the large change in master meter discount amount, including its
24 change to a charge for many DMS-2 customers, which may be confusing. In addition, the

²¹ SCE Response to WMA-SCE-006, Q1.

²² While Resolution E-5356, which approved SCE Advice Letter 5358-E with modifications,
“encourage[s] WMA to participate in the [Implementation working group]” to address
M&O issues, I believe that the issues addressed here are in the scope of this proceeding.

1 use of three tiers of residential charges means for the first time, SCE will have more than
2 one discount amount per residential space, which DMS-2 customers need to understand
3 to ensure they can review the accuracy of their bills. Moreover, DMS-2 customers that
4 have submetered customers defaulted to DRAH status need appropriate communications
5 that would allow them to attest to a different DRAH status if more accurate. Finally, SCE
6 plans no outreach directly to submetered tenants of DMS-2 customers regarding fixed
7 charges as SCE does not have their contact information.²³ However, it would still be
8 beneficial for submetered tenants to have appropriate outreach materials. Given fixed
9 charges of this magnitude are new for SCE customers and SCE's own research indicated
10 customers have negative feelings about these charges and misunderstand their purpose,²⁴
11 customer education is a sensitive and important issue. Master-metered customers can
12 assist with this outreach, but it would be best if their messaging was consistent with
13 SCE's.

14
15 **Q. What do you recommend regarding ME&O issues?**

16 **A.** I recommend:

- 17 • SCE provide a written communication to all DMS-2 customers in advance of the fixed
18 charge implementation explaining the three tiers of charges and how such charges will be
19 billed as a reduction to the master meter discount.
- 20 • SCE provide a written communication to all DMS-2 customers SCE identifies as having
21 DRAH units and include the contact information at SCE for DMS-2 customers to contest
22 the defaulted status and attest to the number DRAH units at the property.
- 23 • DMS-2 bills provide the number of units in each fixed charge tier, including a separate
24 breakdown of the number of units in Tier 2 that are FERA and/or DRAH.
- 25 • To supplement outreach to submetered tenants, SCE provide a form letter that can be
26 posted at each DMS-2 property explaining the new fixed charges with messaging
27 consistent with other SCE customer outreach. SCE provided an example of such a letter

²³ SCE Response to WMA-SCE-006, Q2d.

²⁴ SCE, Advice Letter 5358-E, Appendix A, p. 10.

1 used to explain the California Climate Credit.²⁵ I recommend a similar approach be used
2 here.

3 **V. Conclusion**

4 **Q. Does this conclude your testimony?**

5 A. Yes.

²⁵ SCE Response to WMA-SCE-006, Q2c.

MARY NEAL

PROFESSIONAL EXPERIENCE

Senior Project Manager MRW & Associates, LLC (2018)

Conduct technical analysis of electric and gas utility rate cases and other regulatory filings and serve as expert witness in regulatory proceedings. Perform integrated resource planning on behalf of Community Choice Aggregators and Electric Service Providers in California. Construct and critique models for utility cost allocation, rate design, retail rate forecasts, and benefits of distributed generation facilities. Evaluate energy procurement options and provide analytical and strategic support for business decisions and litigation on electric and gas issues.

Senior Consultant Daymark Energy Advisors, Inc. (2009-2017)

Advised electric and gas industry clients on resource planning, utility rates, and market design issues. Testified before multiple state and Canadian provincial regulatory agencies on issues related to electric market modeling, fuel cost forecasting, cost allocation, rate design, and electric utility capital planning. Prepared and critiqued numerous electric and gas utility allocated cost of service, revenue requirement and rate design models. Led modeling team for Daymark Energy Advisors' AURORAxmp Northeast electric market model.

Engineer Solar Turbines, Inc. (2005-2008)

Designed dry low-emission combustion systems for Mars SoLoNOx gas turbines. Led development of fuel injectors for landfill gas and aftermarket retrofit applications.

EDUCATION

M.A., Energy and Environmental Analysis, Boston University, 2010
B.S. Mechanical Engineering, University of California, Davis, 2005

Prepared Testimony

1. Nova Scotia Utility and Review Board Matter No. 04600
Direct Testimony of Mary Neal on Behalf of the Nova Scotia Small Business Advocate Concerning Nova Scotia Power's 2012 Annual Capital Expenditure Plan. January 13, 2012.
2. Public Service Commission of Wisconsin Docket No. 3270-UR-118
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning Madison Gas & Electric's Application for Authority to Change Electric and Natural Gas Rates. August 27, 2012.
3. Public Service Commission of Wisconsin Docket No. 6690-UR-123
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning Wisconsin Public Service Corporation's Application to Adjust Electric and Natural Gas Rates. August 13, 2014.
4. Nova Scotia Utility and Review Board Matter No. 06514
Direct Testimony of Mary Neal on Behalf of the Nova Scotia Small Business Advocate Concerning Nova Scotia Power's 2015 Annual Capital Expenditure Plan. January 16, 2015.
5. Public Service Commission of Wisconsin Docket No. 05-CE-145/05-CE-147
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning the Joint Application of Wisconsin Electric Power Company, Madison Gas and Electric Company, and WPPI Energy for a Certificate of Authority to Upgrade Various Power Block Equipment at Elm Road Generating Station Units to Facilitate the Use of Sub-Bituminous or Powder River Basin Coals as a Fuel Source/Construct a Site Bulk Material Handling Project at Oak Creek and Elm Road Generating Station. February 24, 2015.
6. Public Service Commission of Wisconsin Docket No. 6690-UR-124
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board of Wisconsin Concerning Wisconsin Public Service Corporation's Application to Adjust Electric and Natural Gas Rates. September 2, 2015.
7. Nova Scotia Utility and Review Board Matter No. 07176
Direct Testimony of Mary Neal on Behalf of the Nova Scotia Small Business Advocate Concerning Nova Scotia Power's 2016 Annual Capital Expenditure Plan. February 17, 2016.
8. New York Public Service Commission Case No. 16-E-0060
Direct Testimony of the Electric Rate Panel on Behalf of the New York Utility Intervention Unit Concerning the Rates, Charges, Rules and Regulations of Consolidated

Edison Company of New York, Inc. for Electric Service (with Lee Smith and Danielle Panko). May 27, 2016.

9. Vermont Public Service Board
Testimony of Mary Neal on Behalf of Swanton Village Electric Concerning Swanton Village Electric's Proposed Electric Vehicle Charging Station Pilot Program (with assistance from Vermont Public Power Supply Authority). June 2016.
10. CPUC Application 18-07-024
Testimony on Behalf of The City of Long Beach, Energy Resources Department. April 12, 2019.
11. Public Service Commission of Wisconsin Docket No. 5-CE-146
Direct Testimony of Mary Neal on Behalf of Citizens Utility Board. April 26, 2019.
12. Public Service Commission of Wisconsin Docket No. 5-CE-146
Supplemental Direct Testimony of Mary Neal on Behalf of Citizens Utility Board. May 3, 2019.
13. Public Service Commission of Wisconsin Docket No. 5-CE-146
Rebuttal Testimony of Mary Neal on Behalf of Citizens Utility Board. May 28, 2019.
14. Public Service Commission of Wisconsin Docket No. 5-CE-146
Surrebuttal Testimony of Mary Neal on Behalf of Citizens Utility Board. May 28, 2019.
15. Public Service Commission of Wisconsin Docket No. 6690-UR-126
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board, Clean Wisconsin & Wisconsin Industrial Energy Group. August 23, 2019.
16. Public Service Commission of Wisconsin Docket No. 6690-UR-126
Supplemental Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board, Clean Wisconsin & Wisconsin Industrial Energy Group. August 28, 2019.
17. Public Service Commission of Wisconsin Docket No. 6690-UR-126
Surrebuttal Testimony of Mary Neal on Behalf of the Citizens Utility Board, Clean Wisconsin & Wisconsin Industrial Energy Group. October 4, 2019.
18. CPUC Application 19-03-002
Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. April 6, 2020.
19. CPUC Application 19-03-002
Rebuttal Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. May 4, 2020.

20. CPUC Application 19-10-012
Testimony of Substitute Witness Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application to Extend and Modify the Power Your Drive Pilot Approved by Decision 16-01-045. May 18, 2020.
21. CPUC Application 19-10-012
Rebuttal Testimony of Substitute Witness Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application to Extend and Modify the Power Your Drive Pilot Approved by Decision 16-01-045. June 19, 2020.
22. CPUC Application 19-09-014
Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Phase 2 Opening Testimony. August 21, 2020.
23. CPUC Application 19-11-019
Direct Testimony of Mary Neal on Behalf of the Western Manufactured Housing Communities Association in Pacific Gas & Electric's 2020 Electric Cost Allocation and Rate Design Proceeding. November 20, 2020.
24. CPUC Application 20-10-012
Direct Testimony of Mary Neal on Behalf of the Western Manufactured Housing Communities Association in Phase 2 of Southern California Edison's 2021 General Rate Case Application. July 26, 2021.
25. CPUC Application 21-08-010
Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Approval of its 2022 Electric Sales Forecast. October 1, 2021.
26. CPUC Application 21-08-010
Rebuttal Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Approval of its 2022 Electric Sales Forecast. October 8, 2021.
27. CPUC Application 21-12-006
Direct Testimony of Mary Neal on Behalf of The Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Approval of Real Time Pricing Pilot Rate. December 30, 2022.
28. CPUC Application 21-12-006
Rebuttal Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Approval of Real Time Pricing Pilot Rate. January 30, 2023.

29. CPUC Application 22-09-015
Testimony of Mary Neal on Behalf of Long Beach Utilities. June 12, 2023.
30. CPUC Application 22-09-015
Rebuttal Testimony of Mary Neal on Behalf of the Western Manufactured Housing Communities Association in Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G) Gas Cost Allocation Proceeding. July 28, 2023.
31. Public Service Commission of Wisconsin Docket No. 4220-CE-185
Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board and Clean Wisconsin. November 29, 2023.
32. Public Service Commission of Wisconsin Docket No. 4220-CE-185
Rebuttal Direct Testimony of Mary Neal on Behalf of the Citizens Utility Board and Clean Wisconsin. December 21, 2023.
33. CPUC Application 23-01-008
Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. January 8, 2024.
34. Public Service Commission of Wisconsin Docket No. 4220-CE-185
Surrebuttal Testimony of Mary Neal on Behalf of Citizens Utility Board and Clean Wisconsin January 16, 2024.
35. CPUC Application 23-01-008
Rebuttal Direct Testimony of Mary Neal on Behalf of the Utility Consumers' Action Network Concerning San Diego Gas & Electric Company's Application for Authority to Update Marginal Costs, Cost Allocation, and Electric Rate Design. February 7, 2024.

Southern California Edison
A.24-03-019 – 2025 SCE GRC Phase 2

DATA REQUEST SET W M A - S C E - 0 0 6

To: WMA
Prepared by: Andre Ramirez
Job Title: Sr Advisor
Received Date: 10/31/2024

Response Date: 11/14/2024

Question 02.a-d:

Regarding income graduated fixed charges planned in response to D.24-05-028:

- a. Please provide a description of SCE's marketing, education, and outreach plan for DMS-2 customers and include all plans to educate customers on changes to the submeter discount.
- b. Please describe the process SCE will use to determine the correct tier of fixed charge for all submetered customers behind DMS-2 master meters in order to calculate the submeter discount correctly.
- c. Please provide a copy of all marketing, education, and outreach mailers and/or bill inserts that have been prepared for customers on the following rates, to the extent available:
 - i. DMS-2
 - ii. D
 - iii. D-CARE
 - iv. D-FERA
- d. Does SCE intend to provide marketing, education, and outreach aimed at submetered tenants behind DMS-2 master meters? If so, please describe this plan.

Response to Question 02.a-d:

a. Please provide a description of SCE's marketing, education, and outreach plan for DMS-2 customers and include all plans to educate customers on changes to the submeter discount.

SCE's marketing plan includes a specific communication regarding the fixed charge that will be directed to SCE account holders, the landlords or managers of sub-metered residents.

b. Please describe the process SCE will use to determine the correct tier of fixed charge for all submetered customers behind DMS-2 master meters in order to calculate the submeter discount correctly.

Customers under DMS are eligible for programs such as CARE and FERA as well as the possible designation for customers living in deed-restricted affordable housing (DRAH). SCE then bills the master metered account based off of the number of customers in each category for CARE and FERA. SCE would also not have information about which unit/tenant would be on a DRAH therefore SCE will apply DRAH identification to all units that are not CARE or FERA. Thus, SCE will render one master metered bill with the information available to us. For instance, for an account with 100 customers, where SCE is aware of, 40 are CARE, 10 are FERA, and the remainder 30 are non-CARE, SCE would assume the following:

- 40 CARE will be treated like CARE

- 10 FERA will be treated as FERA
- Remaining 50 non-CARE/non-FERA will be treated like DRAH

The submeter discount does not change based off of customer programs such as CARE/FERA and this process will continue as is today.

c. Please provide a copy of all marketing, education, and outreach mailers and/or bill inserts that have been prepared for customers on the following rates, to the extent available:

i. DMS-2

ii. D

iii. D-CARE

iv. D-FERA

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that the burden, expense and intrusiveness of this request clearly outweighs the likelihood that the information sought will lead to the discovery of admissible evidence. The discussion of ME&O related to the fixed charge is the subject of a Tier 3 advice letter in compliance with D.24-05-020, which is part of Track A of proceeding R.22-07-005. Subject to and without waiving the foregoing objection, SCE responds as follows:

Please see the attached documents for examples from SCE's Time-of-Use (TOU) acquisition campaign targeting Domestic (page 1-2) and CARE/FERA customers (page 3-4). This campaign did not include DMS customers. Additionally, attached are examples for The California Climate Credit targeting DMS single- and multi-account customers.

d. Does SCE intend to provide marketing, education, and outreach aimed at submetered tenants behind DMS-2 master meters? If so, please describe this plan.

SCE does not have contact information for individual sub-metered tenants and does not provide specific communications to them directly. SCE will communicate with the account holders, the landlords or managers of sub-metered residents. Individual sub-metered tenants have the ability to visit sce.com for more information.

However, overall education and information pertaining to fixed charge is still in the planning process.

Southern California Edison
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DATA REQUEST SET W M A - S C E - 0 0 7

To: WMA
Prepared by: Isabel Correa-Zaragoza
Job Title: Rates Senior Advisor
Received Date: 11/15/2024

Response Date: 12/2/2024

Question 01.a_c:

Regarding SCE's response to WMA-SCE-006 Q02.b, which discusses how SCE will determine the correct tier for income graduated fixed charges needed to calculate the submeter discount:

a. SCE states that "SCE would also not have information about which unit/tenant would be on a DRAH therefore SCE will apply [DeedRestricted Affordable Housing (DRAH)] identification to all units that are not CARE or FERA ." Please explain why the California Housing Partnership data described on page 5 of Appendix A to Advice Letter 5358-E does not provide any information on the DRAH status of DMS-2 accounts. (Isabel)

c. Please confirm that SCE plans to treat all non-CARE/non-FERA DMS-2 submetered accounts as DRAH for purposes of calculating the submeter discount and that Tier 3 fixed charges would never be used in the submeter discount calculation or else explain how Tier 3 fixed charges would be included in the calculation.

Response to Question 01.a_c:

a. SCE was ordered to use the California Housing Partnership (CHP) database to determine which premises are Deed-Restricted Affordable Housing. The CHP database addresses are at the sites provided by DRAH applicants. The database does not have unit-level addresses or service plans for any of the sites. SCE must map the sites to service addresses in our billing system to identify the address as DRAH. Once this mapping activity is complete, SCE will be able to determine how many addresses are DMS-2 accounts.

c. SCE will apply the DRAH status to all non CARE non FERA accounts when the location has been identified as having Deed Restricted Affordable Housing in the California Housing Partnership database. This status will be used for calculating the Base Services Charge amount, not the submeter discount. The submeter discount is marginal cost based and is not tied to any levels of the Base Services Charge.

Southern California Edison
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DATA REQUEST SET W M A - S C E - 0 0 7

To: WMA
Prepared by: Melissa Amador
Job Title: Senior Advisor
Received Date: 11/15/2024

Response Date: 12/2/2024

Question 01.b:

01.b Regarding SCE's response to WMA-SCE-006 Q02.b, which discusses how SCE will determine the correct tier for income graduated fixed charges needed to calculate the submeter discount:

b. Does SCE plan to do any outreach to DMS-2 customers regarding DRAH status of the MHPs served as DMS-2? If so, please describe this outreach

Response to Question 01.b:

SCE will communicate with the account holders, landlords or managers of sub-metered residents, and the content of that communication has not yet been finalized. The submeter discount is not impacted by tier level. SCE does not have contact information for individual sub-metered tenants and does not provide specific communications to them directly, but sub-metered customers do have the ability to visit sce.com for more information. Overall fixed charge education and outreach plans are pending finalization through Commission draft resolution E-5356.

Southern California Edison
A.24-03-019 – 2025 SCE GRC Phase 2

DATA REQUEST SET W M A - S C E - 0 0 7

To: WMA

Prepared by: Melissa Amador

Job Title: Senior Advisor

Received Date: 11/15/2024

Response Date: 12/2/2024

Question 01.b:

01.b Regarding SCE's response to WMA-SCE-006 Q02.b, which discusses how SCE will determine the correct tier for income graduated fixed charges needed to calculate the submeter discount:

b. Does SCE plan to do any outreach to DMS-2 customers regarding DRAH status of the MHPs served as DMS-2? If so, please describe this outreach

Response to Question 01.b:

SCE will communicate with the account holders, landlords or managers of sub-metered residents, and the content of that communication has not yet been finalized. The submeter discount is not impacted by tier level. SCE does not have contact information for individual sub-metered tenants and does not provide specific communications to them directly, but sub-metered customers do have the ability to visit sce.com for more information. Overall fixed charge education and outreach plans are pending finalization through Commission draft resolution E-5356.

Southern California Edison
A.24-03-019 – 2025 SCE GRC Phase 2

DATA REQUEST SET W M A - S C E - 0 0 6

To: WMA
Prepared by: Steve Verdon
Job Title: Advisor
Received Date: 10/31/2024

Response Date: 11/14/2024

Question 01:

Regarding SCE's response to data request WMA-SCE-005, which provides updated tables showing changes to the submeter discount in response to D.24-05-028 which implements an income graduated fixed charge for residential customers: in converting the fixed charge monthly values into daily values, SCE appears to divide the monthly values by 30 days. Since not all months have 30 days, would SCE agree a more accurate way to convert the amount is to multiply the monthly value by 12 and divide by 365? If so please update the tables accordingly.

Response to Question 01: SCE's billing system has a 30 day cycle. Performing the formulaic calculations as requested results in a very small change of approximately 1.45% decrease (in absolute value). It should be noted that the tables were recreated using an average number of days in a month assuming years with 365 days and a leap year for every fourth year as well – The excel file attached with formulae intact illustrates this approach of converting the FC to a daily number.

Table E-1
Present and Proposed Master Meter Adjustments Non-CARE

Line No.	Rate Schedule	Adjustments	2021 GRC Settlement Daily \$/Space	Proposed Rate Daily \$/Space
1	DM	Diversity	-0.084	-0.057
2				
3	DMS-1	Diversity	-0.084	-0.057
4		Discount: Cost of Service	1.212	0.118
5		Line Loss	0	0
6		Energy Theft	0	0
7		Basic Charge	-0.024	-0.793
8				
9		Total Discount	1.1040	-0.7318
10				
11	DMS-2	Diversity	-0.084	-0.057
12		Discount: Cost of Service	0.303	0.420
13		Line Loss	0.006	0.006
14		Energy Theft	0	0
15		Basic Charge	-0.024	-0.793
16				
17		Total Discount	0.201	-0.424
18				
19	DMS-3	Diversity	0.000	-0.057
20	DMS-3	Basic Charge	-0.024	-0.793
21				
22		Total Discount	-0.024	-0.850

Table E-1
Present and Proposed Master Meter Adjustments FERA

Line No.	Rate Schedule	Adjustments	2021 GRC Settlement Daily \$/Space	Proposed Rate Daily \$/Space
1	DM	Diversity	-0.084	-0.057
2				
3	DMS-1	Diversity	-0.084	-0.057
4		Discount: Cost of Service	1.212	0.118
5		Line Loss	0	0
6		Energy Theft	0	0
7		Basic Charge	-0.024	-0.397
8				
9		Total Discount	1.1040	-0.3358
10				
11	DMS-2	Diversity	-0.084	-0.057
12		Discount: Cost of Service	0.303	0.420
13		Line Loss	0.006	0.006
14		Energy Theft	0	0
		Basic Charge	-0.024	-0.397
1				
2		Total Discount	0.201	-0.028
3				
4	DMS-3	Diversity	0.000	-0.057
5	DMS-3	Basic Charge	-0.024	-0.397
6				
7		Total Discount	-0.024	-0.454

Table E-1
Present and Proposed Master Meter Adjustments CARE

Line No.	Rate Schedule	Adjustments	2021 GRC Settlement Daily \$/Space	Proposed Rate Daily \$/Space
1	DM	Diversity	-0.084	-0.057
2				
3	DMS-1	Diversity	-0.084	-0.057
4		Discount: Cost of Service	0.000	0.118
5		Line Loss	0	0
6		Energy Theft	0	0
7		Basic Charge	-0.024	-0.197
8				
9		Total Discount	-0.1080	-0.1358
10				
11	DMS-2	Diversity	-0.084	-0.057
12		Discount: Cost of Service	0.303	0.420
13		Line Loss	0.006	0.006
14		Energy Theft	0	0
		Basic Charge	-0.024	-0.197
1				
2		Total Discount	0.201	0.172
3				
4	DMS-3	Diversity	0.000	-0.057
5	DMS-3	Basic Charge	-0.024	-0.197
6				
7		Total Discount	-0.024	-0.254

Southern California Edison
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DATA REQUEST SET W M A - S C E - 0 0 5

To: WMA
Prepared by: Steve Verdon
Job Title: Advisor
Received Date: 10/4/2024

Response Date: 10/18/2024

Question 01:

In response to WMA-SCE-004 Question 2a, SCE states that, “SCE has yet to determine the appropriate approach on incorporating the impact of the fixed charge into the nonexempt rates shown in Table E-1 from SCE-04A, which will be resolved as part of this proceeding”

Please supplement your response with a revised Table E-1 or tables (since there are multiple fixed charges depending on CARE/FERA status) or indicate when SCE expects to have completed such table(s).

Response to Question 01: Below are the three versions of the proposed table E-1 corresponding to Non-CARE, FERA and CARE Fixed Charges and the proposed updated Diversity Benefit Adjustment (DBA). Note that the fixed charge has been converted to a daily value consistent with table E-1. Additionally, the DBA is a single value for all applicable DMS type customers.

Amended Table E-1:

Table E-1
Present and Proposed Master-Meter Adjustments

Line No.	Rate Schedule	Adjustments	2021 GRC Settlement Daily \$/Space	Proposed Rate Daily \$/Space
1	DM	Diversity	-0.094	-0.073
2				
3	DMS-1	Diversity	-0.084	-0.073
4		Discount: Cost of Service	0.085	0.118
5		Line Loss	0	0
6		Energy Theft	0	0
7		Basic Charge	-0.024	-0.024
8				
9		Total Discount	-0.0227	0.022
10				
11	DMS-2	Diversity	-0.084	-0.073
12		Discount: Cost of Service	0.303	0.420
13		Line Loss	0.006	0.006
14		Energy Theft	0	0
15		Basic Charge	-0.024	-0.024
16				
17		Total Discount	0.201	0.329
18				
19	DMS-3	Diversity	0.000	-0.073
20	DMS-3	Basic Charge	-0.024	-0.024
21				
22		Total Discount	-0.024	-0.097

Note: The basic charge listed is the non-CARE basic charge however, if a tenant is on the CARE rate then the CARE basic charge will be used.

Supplemental Tables with FC Update:*Table E-1***Present and Proposed Master Meter Adjustments Non-CARE**

Line No.	Rate Schedule	Adjustments	2021 GRC Settlement Daily S/Space	Proposed Rate Daily S/Space
1	DM	Diversity	-0.084	-0.057
2				
3	DMS-1	Diversity	-0.084	-0.057
4		Discount: Cost of Service	1.212	0.118
5		Line Loss	0	0
6		Energy Theft	0	0
7		Basic Charge	-0.024	-0.805
8				
9		Total Discount	1.1040	-0.7438
10				
11	DMS-2	Diversity	-0.084	-0.057
12		Discount: Cost of Service	0.303	0.420
13		Line Loss	0.006	0.006
14		Energy Theft	0	0
15		Basic Charge	-0.024	-0.805
16				
17		Total Discount	0.201	-0.436
18				
19	DMS-3	Diversity	0.000	-0.057
20	DMS-3	Basic Charge	-0.024	-0.805
21				
22		Total Discount	-0.024	-0.862

Table E-1
Present and Proposed Master Meter Adjustments FERA

Line No.	Rate Schedule	Adjustments	2021 GRC Settlement Daily \$/Space	Proposed Rate Daily \$/Space
1	DM	Diversity	-0.084	-0.057
2				
3	DMS-1	Diversity	-0.084	-0.057
4		Discount: Cost of Service	1.212	0.118
5		Line Loss	0	0
6		Energy Theft	0	0
7		Basic Charge	-0.024	-0.024
8				
9		Total Discount	1.1040	0.0372
10				
11	DMS-2	Diversity	-0.084	-0.057
12		Discount: Cost of Service	0.303	0.420
13		Line Loss	0.006	0.006
14		Energy Theft	0	0
15		Basic Charge	-0.024	-0.403
16				
17		Total Discount	0.201	-0.034
18				
19	DMS-3	Diversity	0.000	-0.057
20	DMS-3	Basic Charge	-0.024	-0.024
21				
22		Total Discount	-0.024	-0.081

Table E-1
Present and Proposed Master Meter Adjustments CARE

Line No.	Rate Schedule	Adjustments	2021 GRC Settlement Daily S/Space	Proposed Rate Daily S/Space
1	DM	Diversity	-0.084	-0.057
2				
3	DMS-1	Diversity	-0.084	-0.057
4		Discount: Cost of Service	0.000	0.118
5		Line Loss	0	0
6		Energy Theft	0	0
7		Basic Charge	-0.024	-0.024
8				
9		Total Discount	-0.1080	0.0372
10				
11	DMS-2	Diversity	-0.084	-0.057
12		Discount: Cost of Service	0.303	0.420
13		Line Loss	0.006	0.006
14		Energy Theft	0	0
15		Basic Charge	-0.024	-0.200
16				
17		Total Discount	0.201	0.169
18				
19	DMS-3	Diversity	0.000	-0.057
20	DMS-3	Basic Charge	-0.024	-0.024
21				
22		Total Discount	-0.024	-0.081

Southern California Edison
A.24-03-019 – 2025 SCE GRC Phase 2

DATA REQUEST SET W M A - S C E - 0 0 7

To: WMA
Prepared by: Melissa Amador
Job Title: Marketing Senior Advisor
Received Date: 11/15/2024

Response Date: 12/2/2024

Question 02:

02. SCE's response to WMA-SCE-006 Q02.c provided a sample outreach letter that could be posted at a DMS-2 property regarding the California Climate Credit. Does SCE plan to provide a similar letter regarding income-graduated fixed charges implemented in response to D.24-05-028?

Response to Question 02:

SCE has not yet made a determination about communicating specifically to DMS customers similar to the Climate Credit communication.

Southern California Edison
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DATA REQUEST SET W M A - S C E - 0 0 1

To: WMA
Prepared by: Steve Verdon
Job Title: Advisor
Received Date: 4/10/2024

Response Date: 4/23/2024

Question 02:

Table E-1 lists a current master meter adjustment for rate schedule DMS-2 of \$0.201/space/day. However, the DMS-2 tariff lists a discount of \$0.195/space/day. (Refer to tariff Sheet 74497-E). Please explain this discrepancy, including an explanation of whether the line loss adjustment was excluded from the amount listed in the tariff.

Response to Question 02: The discrepancy is due to an error. The difference between the parties' settlement of \$0.201/space/day and the tariff sheet appears to be the omission of line losses. The discount typically contains -\$0.303 and -\$0.06 less both \$0.84 and \$0.024: these values are the cost-of-service discount (\$0.303), the line losses adder (\$0.06), the diversity adjustment (\$0.84) and multi – family basic charge (\$0.024) respectively, which add up to a total discount of \$0.201/space/day.

$$-\$0.303 + -\$0.006 + \$0.084 + \$0.0024 = -\$0.201/\text{space/day}.$$

Southern California Edison
A.24-03-019 – 2025 SCE GRC Phase 2

DATA REQUEST SET W M A - S C E - 0 0 1

To: WMA
Prepared by: Steve Verdon
Job Title: Advisor
Received Date: 4/10/2024
Response Date: 4/23/2024

Question 01:

Please provide all workpapers relied on for the master meter discount calculations provided in Appendix E to SCE-04-Rate Design Proposals.

Response to Question 01: SCE submitted its work paper for the customer marginal cost portion of the discount in the file titled, "SCE 02_I.C.3_CMC Study". The rest, the line losses and diversity adjustment, are either a settlement-based number based on a study provided by WMA in the 2009 GRC (line losses) or a SAS program with confidential data at the individual customer level. The customer marginal cost excel is attached. See the tab "O|Summary". SCE will provide WMA a copy of the SAS program and confidential data upon receipt of an executed nondisclosure agreement.

Southern California Edison
A.24-03-019 – 2025 SCE GRC Phase 2

DATA REQUEST SET W M A - S C E - 0 0 2

To: WMA
Prepared by: Steve Verdon
Job Title: Advisor
Received Date: 7/2/2024

Response Date: 7/16/2024

Question 01.a-b:

Regarding D.24-05-028 which implements an income graduated fixed charge for residential customers.

a. Please describe how, if at all, SCE proposes to adjust the submeter discount described in Appendix E to Exhibit SCE-04 upon implementation of the fixed charge.

b. Please provide workpapers showing the proposed updated submeter discount calculation post implementation of the fixed charge.

Response to Question 01.a-b:

Part a: While the fixed charge will increase the proportion of revenue recovered on a \$/account basis it will not impact the Submetering Discount, which is based on marginal cost as described in SCE-04, Appendix E – Master Meter Rate Adjustments. The Appendix contains detailed discussion and analysis on the Diversity Adjustment and the Submetering discount as used the calculation of the total discount for the specified DMS customers.

Part b: Please see response above. Given there is no impact, there is no corresponding workpaper.

Southern California Edison
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DATA REQUEST SET W M A - S C E - 0 0 3

To: WMA
Prepared by: Steve Verdon
Job Title: Advisor
Received Date: 7/17/2024

Response Date: 7/31/2024

Question 01.a-b:

Regarding SCE's response to data request WMA-SCE-002, which discusses SCE's plan not to update the submeter discount in response to D.24-05-028 which implements an income graduated fixed charge for residential customers.

a. The data request response referred to above discusses that the submeter discount is based on marginal cost. However, the final submeter discount also subtracts out SCE's current Basic Charge of \$0.024/unit/day. Will this Basic Charge still be in existence post implementation of the new fixed charge? If not, how will the new fixed charge structure impact the final calculation of the submetering discount?

b. Please confirm, as indicated in the data request response, that SCE has no plans to recalculate the proposed Diversity Benefit Adjustment due to implementation of the new fixed charge structure.

Response to Question 01.a-b:

01.a. No, SCE will use the new fixed charge as appropriate

01.b. As part of the GRC Phase II process, SCE will recalculate the Diversity Benefit Adjustment when it files ERRATA.

Southern California Edison
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DATA REQUEST SET W M A - S C E - 0 0 4

To: WMA
Prepared by: Steve Verdon
Job Title: Advisor
Received Date: 9/18/2024

Response Date: 10/2/2024

Question 01:

Please explain the reasons for the proposed increase in the diversity benefit adjustment presented in SCE-04A: Amended Rate Design Proposals compared to the original value presented in SCE-04. The diversity benefit adjustment increased from \$0.067/space/day to \$0.073/space/day.

Response to Question 01: Because of an underlying change in the rates included in SCE's amended filing, the DBA will also change. In particular with the new rates, the Individual Park bills go up due to the common area revenue going up, which is assumed to be on the TOU-GS-1 rate for the directly metered parks, but is treated as domestic usage for the master metered park calculation thus increasing the value of diversity by 1.66%.

Southern California Edison
A.24-03-019 – 2025 SCE GRC Phase 2

DATA REQUEST SET W M A - S C E - 0 0 4

To: WMA
Prepared by: Ray Liang
Job Title: Advisor
Received Date: 9/18/2024

Response Date: 10/2/2024

Question 02.b:

Regarding SCE's response to data request WMA-SCE-003, which discusses potential changes to the submeter discount in response to D.24-05-028 which implements an income graduated fixed charge for residential customers:

b. Does SCE propose to change the submetering bill credit in DMS-2 from a rate discount to a rate adder after implementation of the fixed charge ordered in D.24-05-028 because the Basic Charge will exceed the sum of the other components of the submetering discount? If so, why is this reasonable?

Response to Question 02.b:

SCE expects the DMS-2 submetering discount to not be impacted by implementation of the IGFC. The current submetering discount of \$0.303 / unit / day represents SCE's cost saving for not needing to install meters for DMS tenants and is already set on marginal cost basis. The discount was in no way tied to the current residential basic charges rate design and thus will not be impacted by implementation of IGFC.

Southern California Edison
A.24-03-019 – 2025 SCE GRC Phase 2

DATA REQUEST SET W M A - S C E - 0 0 4

To: WMA
Prepared by: Steve Verdon
Job Title: Advisor
Received Date: 9/18/2024

Response Date: 10/2/2024

Question 02.a:

Regarding SCE's response to data request WMA-SCE-003, which discusses potential changes to the submeter discount in response to D.24-05-028 which implements an income graduated fixed charge for residential customers:

a. The data request response indicates that the submetering discount may change due to a change in Basic Charge upon implementation of the new fixed charge. If so, please provide a version of Table E-1 from SCE-04A that reflects the expected new Basic Charge after D.24-05-028 is implemented.

Response to Question 02.a:

The specific submetering discount will not change. The submetering discount is based on single family underground *marginal cost* and that *marginal cost* is not affected by the design of the income graduated fixed charge (IGFC).

Table E-1 from SCE-04A will reflect the new fixed charge, but the submetering discount in that table will not change. The sum in that table will also change, but the customer charge (basic charge or fixed charge) is a straight pass-through and any increase in the master metered bill due to the fixed charge will be exactly offset by the fixed charge revenues charged to the master metered tenants. Thus, the overall submetering discount is not materially impacted. SCE has yet to determine the appropriate approach on incorporating the impact of the fixed charge into the non-exempt rates shown in Table E-1 from SCE-04A, which will be resolved as part of this proceeding.

Southern California Edison
A.24-03-019 – 2025 SCE GRC Phase 2

DATA REQUEST SET W M A - S C E - 0 0 4

To: WMA
Prepared by: Andre Ramirez
Job Title: Senior Advisor
Received Date: 9/18/2024

Response Date: 10/2/2024

Question 03:

When does SCE intend to implement the fixed charge ordered in D.24-05-028?

Response to Question 03:

Per the Decision, SCE intends to implement in Q4 2025, beginning on or about October 1, 2025.