

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

Application of Southern California Edison
Company (U 338-E) for Approval of Large
Power Dynamic Pricing Rate.

Application 24-06-014
(Filed June 26, 2024)

CONSOLIDATED

Application of Southern California Edison
Company (U 338-E) for Approval of Marginal
Cost-Based Dynamic Pricing Rates In
Compliance With Decision 22-10-022 And
Load Management Standards.

Application 24-12-008
(Filed December 20, 2024)

CERTIFICATE OF SERVICE

I hereby certify that I have served, on this day, a copy of the foregoing **REBUTTAL**
TESTIMONY OF SAM HARPER ON BEHALF OF THE CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION in the above captioned proceeding(s) to be served to all known parties by either
United States mail or electronic mail, to each party named in the attached, official service list
for the consolidated proceedings **Application 24-06-014** and **Application 24-12-008** obtained
from the Commission's website, attached hereto, and pursuant to the Commission's Rules of
Practice and Procedure.

Dated February 17, 2026 at San Francisco, California.



Michael McIntosh



California
Public Utilities
Commission



[CPUC Home](#)

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

**PROCEEDING: A2406014 - APPLICATION OF SOUTH
FILER: SOUTHERN CALIFORNIA EDISON COMPANY
LIST NAME: LIST
LAST CHANGED: FEBRUARY 11, 2026**

Parties

JEANNE ARMSTRONG
SR. ATTORNEY - REGULATORY
SOLAR ENERGY INDUSTRIES ASSOCIATION
EMAIL ONLY
SACRAMENTO, CA 00000
FOR: SOLAR ENERGY INDUSTRIES ASSOCIATION

ROBERT D. SWEETIN
ATTORNEY
DAVISON VAN CLEVE, P.C.
4675 W. TECO AVE., SUITE 230
LAS VEGAS, NV 89118
FOR: ELECTRIFY AMERICA, LLC

MICHAEL DAMASCO
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
320 West 4th Street Suite 500
Los Angeles, CA 90013
FOR: PUBLIC ADVOCATES OFFICE
MARKETS

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
5737 KANAN ROAD, STE. 610
AGOURA HILLS, CA 91301-1601
FOR: ALLIANCE FOR RETAIL ENERGY

JAMES WHOOLEY
SENIOR ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. / PO BOX 800
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY
(FEA)

SCOTT JOHANSEN
COUNSEL
FEDERAL EXECUTIVE AGENCIES
750 PACIFIC HIGHWAY
SAN DIEGO, CA 92132
FOR: FEDERAL EXECUTIVE AGENCIES

HARILAL KRISHNA
SR. ANALYST - REGULATION
HANWHA Q CELLS AMERICA INC
300 SPECTRUM DRIVE, STE. 1250
IRVINE, CA 92618

JENNIFER L. WEBERSKI
LITIGATION SUPERVISOR
SMALL BUSINESS UTILITY ADVOCATES
548 MARKET STREET, SUITE 11200
SAN FRANCISCO, CA 94104

FOR: HANWHA Q CELLS AMERICA INC.
ADVOCATES

KATRINA TOMAS
EARTHJUSTICE
1 SANSOME ST, STE 1700
SAN FRANCISCO, CA 94104
FOR: INDUSTRIOUS LABS

CONSUMERS

ANNA FERO
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
50 CALIFORNIA STREET, 23RD FLR
SAN FRANCISCO, CA 94111
FOR: PACIFIC STEEL GROUP
ALLIANCE

ZACH WOOGEN
EXECUTIVE DIR
VEHICLE-GRID INTEGRATION COUNCIL
1401 21ST ST., SUITE 5409
300 Capitol Mall
SACRAMENTO, CA 95811
FOR: VEHICLE-GRID INTEGRATION COUNCIL

FOR: SMALL BUSINESS UTILITY

(SBUA)

NORA SHERIFF, ESQ.
COUNSEL
BUCHALTER LLP
425 MARKET STREET, 29TH FL.
SAN FRANCISCO, CA 94105
FOR: CALIFORNIA LARGE ENERGY

ASSOCIATION (CLECA)

SCOTT MURTISHAW
EXECUTIVE DIRECTOR
CALIFORNIA ENERGY STORAGE ALLIANCE
808 R STREET, SUITE 209
SACRAMENTO, CA 95811
FOR: CALIFORNIA ENERGY STORAGE

(CESA)

CORWIN HOCKEMA
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION

Sacramento, CA 95814
FOR: PUBLIC ADVOCATES OFFICE

Information Only

BOBBY SILICANI
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

KAROLINA MASLANKA
CALIF ENERGY STORAGE ALLIANCE (CESA)
EMAIL ONLY
EMAIL ONLY, CA 00000

SMITA GUPTA
CALMTA
EMAIL ONLY
EMAIL ONLY, CA 00000

STEPHEN BRIGHT

CENTRAL FILES
SEMPRA ENERGY UTILITIES
EMAIL ONLY
EMAIL ONLY, CA 00000

RUSSELL ARCHER
SOUTHERN CALIFORNIA EDISON COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

KAY DAVOODI

SR. COUNSEL
ELECTRIFY AMERICA, LLC
1950 OPPORTUNITY WAY, STE. 1500
RESTON, VA 20191
5065

FEDERAL EXECUTIVE AGENCIES
UTILITY RATES AND STUDIES OFFICE
1322 PATTERSON AVE SE, SUITE 1000
WASHINGTON NAVY YARD, DC 20374-

LARRY ALLEN
UTILITY RATES & STUDIES OFFICE
UNITED STATES NAVY / FED EXE. AGENCIES
1322 PATTERSON AVE SE SUITE 1000
WASHINGTON NAVY YARD, CA 20374-5065

BLAKE ELDER
EQ RESEARCH LLC
1155 KILDAIRE FARM ROAD, SUITE 203
CARY, NC 27511

JASON HOYLE
EQ RESEARCH
1155 KILDAIRE FARM ROAD, STE 203
CARY, NC 27511

TERESA CHANG
INDUSTRIOUS LABS
530 WALNUT STREET, SUITE 200
CINCINNATI, OH 45202

TERESA CHENG
INDUSTRIOUS LABS
530 WALNUT STREET, SUITE 200
CINCINNATI, OH 45202

TERESA CHENG
INDUSTRIOUS LABS
530 WALNUT STREET, STE. 200
CINCINNATI, OH 45202

CEM TURHAL
DIRECT ENERGY BUSINESS, LLC
910 LOUISIANA STREET, SUITE B200
HOUSTON, TX 77002

ELYSIA VANNOY
NRG - DIRECT ENERGY
910 LOUISIANA STREET
HOUSTON, TX 77002

SAM HARPER
CONSULTANT
HARPER ADVISORY LLC
1401 LAKE PLAZA DR SUITE 200-107
SPRING, TX 77389

C.C. SONG
DIR - REGULATORY
CLEAN POWER ALLIANCE
555 W. 5TH STREET, 35TH FLOOR
LOS ANGELES, CA 90013

PATRICIA HASHIMOTO
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
PROGRAM
320 West 4th Street Suite 500
Los Angeles, CA 90013

VANESSA MARTINEZ
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER
PROGRAM
320 West 4th Street Suite 500
Los Angeles, CA 90013

SARA GERSEN
SR. ATTORNEY
EARTHJUSTICE
707 WILSHIRE BLVD., SUITE 4300
LOS ANGELES, CA 90017

GREGORY KLATT
ATTORNEY
DOUGLASS, LIDDELL & KLATT
411 E. HUNTINGTON DRIVE, STE. 107
ARCADIA, CA 91006

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET

MONICA SHORS
SR ADVISOR
SOUTHERN CALIFORNIA EDISON COMPANY

ROSEMEAD, CA 91770

RATES OPERATIONS
8631 RUSH STREET
ROSEMEAD, CA 91770

REUBEN BEHLIOMJI
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA 91770

SAN EA
SOUTHERN CALIFORNIA EDISON
8631 RUSH STREET
ROSEMEAD, CA 91770

JENNIFER MUELLER
PARALEGAL SPECIALIST
NAVAL F. E. S. COMMAND, SW
750 PACIFIC HIGHWAY
SAN DIEGO, CA 92132

BRANDON GERSTLE
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
ROOM 5115
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHRISTOPHER HOGAN
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
AND
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CLINTON CHAN
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC RATES, CUSTOMER GENERATION
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

GREGORY HEIDEN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
PROGRAM
AREA 5-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LAUREN SCHENCK
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

OTTO NICHOLS
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
AND
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PARIMALRAM A. MADDURI
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC RATES, CUSTOMER GENERATION
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PRIYA E. MISRA
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
PROGRAM
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SHELLY LYSER
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

XIAN "CINDY" LI
CALIF PUBLIC UTILITIES COMMISSION

JAMES BIRKELUND
GENERAL COUNSEL

ELECTRICITY PRICING AND CUSTOMER PROGRAM
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SMALL BUSINESS UTILITY ADVOCATES
548 MARKET STREET, STE 11200
SAN FRANCISCO, CA 94104

JOSEPH GRIFFIN
EARTHJUSTICE
1 SANSOME STREET, SUITE 1700
SAN FRANCISCO, CA 94104

LILLY B. MCKENNA
ATTORNEY
STOEL RIVES LLP
ONE MONTGOMERY STREET, STE 3230
SAN FRANCISCO, CA 94104

RACHEL BIRD
FOREFRONT POWER
100 MONTGOMERY STREET, STE. 725
SAN FRANCISCO, CA 94104

SAMIR A. HAFEZ, ESQ.
ATTORNEY
BUCHALTER LLP
425 MARKET STREET, 29TH FLOOR
SAN FRANCISCO, CA 94105-2491

CHASITY HENDREN
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
50 CALIFORNIA STREET, STE. 2300
SAN FRANCISCO, CA 94111

VIDHYA PRABHAKARAN
ATTORNEY
DAVIS WRIGHT TREMAINE LLP
50 CALIFORNIA STREET, 23RD FLR
SAN FRANCISCO, CA 94111

DAVIS WRIGHT TREMAINE LLP
50 CALIFORNIA STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111

MEGAN M. MYERS
ATTORNEY
LAW OFFICES OF MEGAN M. MYERS
110 OXFORD STREET
SAN FRANCISCO, CA 94134

RACHEL BIRD
RACHEL BIRD STRATEGIES, INC.
1223 PARU STREET
ALAMEDA, CA 94501

LUKE TOUGAS
CONSULTANT
CLEAN ENERGY REGULATORY RESEARCH
849 E. STANLEY BLVD NO.264
LIVERMORE, CA 94550

CATHERINE E. YAP
BARKOVICH & YAP, INC.
PO BOX 11031
OAKLAND, CA 94611

CHRIS MCROBERTS
PACIFIC GAS AND ELECTRIC COMPANY
300 LAKESIDE DRIVE
OAKLAND, CA 94612

RACHEL SWEETNAM
ATTORNEY
CENTER FOR ACCESSIBLE TECHNOLOGY
3075 ADELINE STREET, SUITE 220
BERKELEY, CA 94703

R. THOMAS BEACH
PRINCIPAL CONSULTANT
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710-2557

DANIEL HORAN
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC RATES, CUSTOMER GENERATION AND

SCOTT BLAISING
ATTORNEY
BRAUN BLAISING & WYNNE, P.C.

300 Capitol Mall
Sacramento, CA 95814

MANAL YAMOUT MCDERMID
CALIBER STRATEGIES
PO BOX 160724
SACRAMENTO, CA 95816

ANDREW B. BROWN
ATTORNEY AT LAW
BIERING & BROWN LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5931

RONALD LIEBERT
ATTORNEY AT LAW
BIERING & BROWN, LLP
2600 CAPITOL AVENUE, STE. 400
SACRAMENTO, CA 95816-5931

555 CAPITOL MALL, SUITE 570
SACRAMENTO, CA 95814

REGULATORY CLERK
BRAUN BLAISING & WYNNE, PC (BB&W)
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816

BRIAN S. BIERING
ATTORNEY
BIERING & BROWN, LLP
2600 CAPITOL AVE., STE. 400
SACRAMENTO, CA 95816-5931

JENNIFER FRY
FERC SPECIALIST / PRACTICE ASSIST.
STOEL RIVES LLP
760 SW NINTH AVENUE, SUITE 3000
PORTLAND, OR 97205



California
Public Utilities
Commission



[CPUC Home](#)

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: A2412008 - APPLICATION OF SOUTH
FILER: SOUTHERN CALIFORNIA EDISON COMPANY
LIST NAME: NIOPOST
LAST CHANGED: JANUARY 6, 2026

Parties

JEANNE ARMSTRONG
SR. ATTORNEY - REGULATORY
SOLAR ENERGY INDUSTRIES ASSOCIATION
EMAIL ONLY
SACRAMENTO, CA 00000
FOR: SOLAR ENERGY INDUSTRIES ASSOCIATION

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
5737 KANAN ROAD, STE. 610
AGOURA HILLS, CA 91301-1601
FOR: ALLIANCE FOR RETAIL ENERGY MARKETS

JAMES WHOOLEY
SENIOR ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. / PO BOX 800
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

JENNIFER L. WEBERSKI
LITIGATION SUPERVISOR
SMALL BUSINESS UTILITY ADVOCATES
548 MARKET STREET, SUITE 11200
SAN FRANCISCO, CA 94104
FOR: SMALL BUSINESS UTILITY ADVOCATES
(SBUA)

NORA SHERIFF
COUNSEL
BUCHALTER LLP
425 MARKET STREET, 29TH FLR
SAN FRANCISCO, CA 94105-2491
FOR: CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION

SCOTT MURTISHAW
EXECUTIVE DIRECTOR
CALIFORNIA ENERGY STORAGE ALLIANCE
808 R STREET, SUITE 209
SACRAMENTO, CA 95811
FOR: CALIFORNIA ENERGY STORAGE ALLIANCE
(CESA)

CORWIN HOCKEMA
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
300 Capitol Mall
Sacramento, CA 95814

SCOTT BLAISING
ATTORNEY
BRAUN BLAISING & WYNNE, P.C.
555 CAPITOL MALL, SUITE 570
SACRAMENTO, CA 95814

FOR: PUBLIC ADVOCATES OFFICE

FOR: CALIFORNIA CHOICE ENERGY AUTHORITY

Information Only

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

JASON HOYLE
EQ RESEARCH
1155 KILDAIRE FARM ROAD, STE 203
CARY, NC 27511

VANESSA MARTINEZ
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
320 West 4th Street Suite 500
Los Angeles, CA 90013

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
8631 RUSH STREET
ROSEMEAD, CA 91770

BRANDON GERSTLE
CALIF PUBLIC UTILITIES COMMISSION
ADMINISTRATIVE LAW JUDGE DIVISION
ROOM 5115
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHRISTOPHER HOGAN
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

GREGORY HEIDEN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
AREA 5-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LAUREN SCHENCK
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
AREA
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

XIAN "CINDY" LI
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JAMES BIRKELUND
GENERAL COUNSEL
SMALL BUSINESS UTILITY ADVOCATES
548 MARKET STREET, STE 11200
SAN FRANCISCO, CA 94104

SAMIR A. HAFEZ, ESQ.
ATTORNEY
BUCHALTER LLP
425 MARKET STREET, 29TH FLOOR
SAN FRANCISCO, CA 94105-2491

MEGAN M. MYERS
ATTORNEY
LAW OFFICES OF MEGAN M. MYERS
110 OXFORD STREET
SAN FRANCISCO, CA 94134

RACHEL BIRD
RACHEL BIRD STRATEGIES, INC.
1223 PARU STREET
ALAMEDA, CA 94501

LUKE TOUGAS
CONSULTANT
CLEAN ENERGY REGULATORY RESEARCH
849 E. STANLEY BLVD NO.264

LIVERMORE, CA 94550

CHRIS MCROBERTS
PACIFIC GAS AND ELECTRIC COMPANY
300 LAKESIDE DRIVE
OAKLAND, CA 94612

RACHEL SWEETNAM
ATTORNEY
CENTER FOR ACCESSIBLE TECHNOLOGY
3075 ADELINE STREET, SUITE 220
BERKELEY, CA 94703

R. THOMAS BEACH
PRINCIPAL CONSULTANT
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710-2557

MANAL YAMOUT MCDERMID
CALIBER STRATEGIES
PO BOX 160724
SACRAMENTO, CA 95816

REGULATORY CLERK
BRAUN BLAISING & WYNNE, PC (BB&W)
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816

ANDREW B. BROWN
ATTORNEY AT LAW
BIERING & BROWN LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5931

BRIAN S. BIERING
ATTORNEY
BIERING & BROWN, LLP
2600 CAPITOL AVE., STE. 400
SACRAMENTO, CA 95816-5931

RONALD LIEBERT
ATTORNEY AT LAW
BIERING & BROWN, LLP
2600 CAPITOL AVENUE, STE. 400
SACRAMENTO, CA 95816-5931
