Docket <u>A.25-04-001</u>

Exhibit Number : <u>CA-02</u>

Commissioner : <u>John Reynolds</u> Admin. Law Judge : <u>Elaine Lau</u>

Public Advocates :

Office Project Mgr. : <u>Stanley Kuan</u>

Witnesses : <u>S. Kuan, M. Ammermuller,</u>

M. Yeo, K. Lutes, B. Lui,

C. Jenquin



### **PUBLIC ADVOCATES OFFICE**

CALIFORNIA PUBLIC UTILITIES COMMISSION

## **APPENDIX B**

# SUPPORTING ATTACHMENTS TO THE TESTIMONY

(PUBLIC VERSION)

San Francisco, California December 5, 2025

### LIST OF ATTACHMENTS FOR CHAPTER 2

#	Attachment	Description
1	Attachment 2.1 (Confidential)	SCE ERRA 2024 Section D_Price Forecast_CONFIDENTIAL.xlsx (Available via e-mail)
2	Attachment 2.2 (Confidential)	SCE ERRA 2024 Section D_DLAP Awards and Prices_CONFIDENTIAL.xlsx (Available via e-mail)
3	Attachment 2.3 (Confidential)	SCE Responses to Cal Advocates Data Requests CONF.pdf
4	Attachment 2.4 (Confidential)	SCE ERRA 2024 Section D_DLAP Awards and Prices_DR02-Q1_SUPPLEMENT_CONFIDENTIAL.xlsx (Available via e-mail)
5	Attachment 2.5 (Confidential)	SCE ERRA 2024 Section H_Disp Awards- Bids_CONFIDENTIAL.xlsx (Available via e-mail)
6	Attachment 2.6 (Confidential)	Storage Bids CONF.xlsx (Available via e-mail)
7	Attachment 2.7 (Confidential)	SCE ERRA 2024 Section D_RUOES_CONFIDENTIAL (check).xlsx (Available via e-mail)
8	Attachment 2.8 (Confidential)	SCE ERRA 2024 Section H_SS and Market Awards_CONFIDENTIAL.xlsx (Available via e-mail)
9	Attachment 2.9 (Confidential)	SCE ERRA 2024 Section D_Hydro Awards- LMPs_CONFIDENTIAL.xlsx (Available via e-mail)
10	Attachment 2.10	SCE Response to Master Data Request.pdf
11	Attachment 2.11 (Confidential)	SCE ERRA 2024 Section I_DR-CBP-DA_CONFIDENTIAL.xlsx (Available via e-mail)
12	Attachment 2.12 (Confidential)	SCE ERRA 2024 Section I_DR- LCR_ACES_CONFIDENTIAL.xlsx (Available via e-mail)

#	Attachment	Description
13	Attachment 2.13 (Confidential)	SCE ERRA 2024 Section I_DR-LCR_AMS_CONFIDENTIAL.xlsx (Available via e-mail)
14	Attachment 2.14 (Confidential)	SCE ERRA 2024 Section I_DR- LCR_STEM_CONFIDENTIAL.xlsx (Available via e-mail)
15	Attachment 2.15 (Confidential)	SCE ERRA 2024 Section I_DR-SDP_CONFIDENTIAL.xlsx (Available via e-mail)
16	Attachment 2.16 (Confidential)	SCE ERRA 2024 Section I_DR-SEP_CONFIDENTIAL.xlsx (Available via e-mail)
17	Attachment 2.17 (Confidential)	SCE ERRA 2024 CalAdv WP DR Combined CONFIDENTIAL.xlsx (Available via e-mail)
18	Attachment 2.18 (Confidential)	2023 SCE-03 Ch I. Section D.1_DLAP Awards and Prices_CONFIDENTIAL.xlsx (Available via e-mail)

SCE ERRA 2024 Section D\_Price Forecast\_CONFIDENTIAL.xlsx

(Confidential)

## SCE ERRA 2024 Section D\_DLAP Awards and Prices\_CONFIDENTIAL.xlsx

(Confidential)

SCE Responses to Cal Advocates Data Requests CONF.pdf

(Confidential)

### Southern California Edison A,25-04-001 – 2024 ERRA Review

#### DATA REQUEST SET CalAdv-SCE-009

To: Cal Advocates
Prepared by: Adaora Okoro
Job Title: Senior Manager
Received Date: 8/18/2025

**Response Date: 8/29/2025** 

#### **Question 01.a-l:**

In a format like that provided by SCE in response to Cal Advocates DR 01, please provide the hourly DA Award, MWh Delivered, and Variance for the following dates:



#### **Response to Question 01.a-l:**

#### CONFIDENTIAL

The Attachment(s) Are Marked Confidential In Accordance With Applicable Law and Regulation.

Basis for Confidentiality In Accompanying Confidentiality Declaration.

Public Disclosure Restricted.

Please see the tab titled "DR09 - Question 1" in the attached confidential Excel file titled "01\_SCE ERRA 2024 Section D\_DLAP Awards and Prices\_DR09-Q1\_CONFIDENTIAL.xlsx". Note that in this workbook, SCE has also included the "Hourly *Net* MWh Usage" data for the requested period. The net megawatt hour usage data is a more appropriate comparison to the Hourly Award data, as SCE procures demand in the CAISO market to serve net load (e.g. load net of rooftop solar).

In addition to the net megawatt hour usage data provided here, SCE will submit a supplement to workpaper "SCE ERRA 2024 Section D\_DLAP Awards and Prices\_CONFIDENTIAL" as well as a supplement to A.25-04-001 Cal Advocates DR No. 02 to SCE.pdf to include the "Hourly Net MWh Usage" data.

### Southern California Edison A,25-04-001 – 2024 ERRA Review

#### DATA REQUEST SET PubAdv-SCE-014

To: Public Advocates Office Prepared by: Richard Song Job Title: Senior Advisor Received Date: 9/15/2025

**Response Date: 9/29/2025** 

#### **Question Q.06:**

- 6. In response to Cal Advocates DR 09, SCE states "The net megawatt hour usage data is a more appropriate comparison to the Hourly Award data, as SCE procures demand in the CAISO market to serve net load (e.g. load net of rooftop solar)."
- a. Are there other factors besides rooftop solar (e.g. other Behind-the-Meter generation, energy storage, etc.) that influence the "net load"?
- b. If so, what are these other factors?

#### **Response to Question Q.06:**

Rooftop solar is the largest and most significant component influencing net load. All other components together are of minimal impact relative to solar.

Several other technologies are eligible as Renewable Energy Generating Facilities under Net Energy Metering (NEM) or Net Billing Tariff (NBT) definitions. Besides photovoltaic, eligible technologies also include wind, solar thermal, geothermal, and fuel cells using renewable fuels. These and other renewable sources are further defined in the CEC's RPS Guidebook (https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard).

#### Southern California Edison A.25-04-001 – 2024 ERRA Review

#### DATA REQUEST SET CalAdv-SCE-011

To: Cal Advocates
Prepared by: Adaora Okoro
Job Title: Senior Manager
Received Date: 8/28/2025

Response Date: 9/12/2025

#### Question Q.01:

In A.23-04-003, SCE's response to Cal Advocates DR 06, Q3 included a description of, among other things, SCE's bidding strategy for stand-alone energy storage charge and discharge bidding (see attached confidential response "PubAdv-SCE-006 - 03 - Answer Confidential.pdf").

a. Please provide any changes or updates to the strategies described in SCE's attached response from 5/30/2023 through the 2024 Record Period.

#### Response to Question Q.01:

#### CONFIDENTIAL

This Response Is Marked Confidential In Accordance With Applicable Law and Regulation.

Basis for Confidentiality In Accompanying Confidentiality Declaration.

Public Disclosure Restricted.

Throughout the record year,	

SCE continues to refine its energy storage bidding strategies as market rules and market conditions change,

### Southern California Edison A.25-04-001 – 2024 ERRA Review

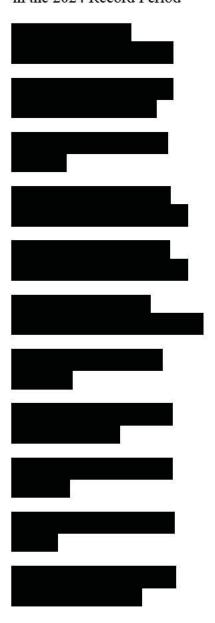
#### DATA REQUEST SET PubAdv-SCE-019

To: Public Advocates Office Prepared by: Philip Schofield Job Title: Senior Manager Received Date: 10/16/2025

Response Date: 10/30/2025

#### Question Q.01:

Please confirm if SCE acted as the Scheduling Coordinator (SC) for these energy storage resources in the 2024 Record Period





### Response to Question Q.01:

SCE confirms that SCE acted as the Scheduling Coordinator for the listed energy storage resources in the 2024 record period.

### Southern California Edison A,25-04-001 – 2024 ERRA Review

#### DATA REQUEST SET PubAdv-SCE-019

To: Public Advocates Office Prepared by: Philip Schofield Job Title: Senior Manager Received Date: 10/16/2025

**Response Date: 10/30/2025** 

#### **Question Q.02:**

Please identify any other energy storage resources not listed above, either owned by SCE or under contract with SCE, for which SCE acted as the SC in the 2024 Record Period.

#### **Response to Question Q.02:**

SCE did not act as Scheduling Coordinator for any other energy storage resources in the 2024 Record Period beyond those listed in Question 1. SCE did incorporate energy schedules from Cathode energy storage resource as a load modifier in the SCE Bundled Customer Load schedule.

## SCE ERRA 2024 Section D\_DLAP Awards and Prices\_DR02-Q1\_SUPPLEMENT\_CONFIDENTIAL.xlsx

(Confidential)

## SCE ERRA 2024 Section H\_Disp Awards-Bids\_CONFIDENTIAL.xlsx

(Confidential)

**Storage Bids CONF.xlsx** 

(Confidential)

SCE ERRA 2024 Section D\_RUOES\_CONFIDENTIAL (check).xlsx

(Confidential)

## SCE ERRA 2024 Section H\_SS and Market Awards\_CONFIDENTIAL.xlsx

(Confidential)

## SCE ERRA 2024 Section D\_Hydro Awards-LMPs\_CONFIDENTIAL.xlsx

(Confidential)

**SCE Response to Master Data Request.pdf** 

#### Southern California Edison A,25-04-001 – 2024 ERRA Review

#### DATA REQUEST SET PubAdv-S CE-001-MDR 1

To: Public Advocates Office
Prepared by: Farimah Shirmohammadi
Job Title: Senior Specialist
Received Date: 2/3/2025

**Response Date: 4/3/2025** 

#### **Question 1.1.11.c:**

For each and every plant of 25 MW capacity or greater, and each unit of such plants with multiple units, which incurred an outage during the Record Period, of 24 hours duration or greater, which such outage was scheduled more than 45 days prior to the commencement of the outage, identify each and every such outage, specifying:

- c) Hydroelectric plants,
- 1. The text label for the plant at which the outage occurred;
- 2. The text label for the unit of the plant at which the outage occurred (if all units were similarly affected, you may identify the unit as "All," and report aggregated data, otherwise list unit outages separately);
- 3. The date, in MS Excel date serial number format, on which this outage for this purpose was first scheduled, if the actual date is not known, then provide a best-effort estimate;
- 4. Identify, with a text entry of "Actual" or "Estimated," the nature of the date provided in response to the previous question;
- 5. The date, in MS Excel date serial number format, on which this outage was initially scheduled to begin, when first scheduled, if the actual date is not known, then provide a best-effort estimate;
- 6. Identify, with a text entry of "Actual" or "Estimated," the nature of the date provided in response to the previous question;
- 7. The time duration, in days, provided in an MS Excel number format, for which this outage was initially scheduled to last, when first scheduled, if the actual, initially-scheduled outage duration is not known, provide a best-effort estimate;
- 8. Identify, with a text entry of "Actual" or "Estimated," the nature of the duration provided in response to the previous question;
- 9. The date and hour ("hour ending" form) the outage actually began, in MS Excel date/time serial format;
- 10. The date and hour ("hour ending" form) the outage actually ended, in MS Excel date/time serial format;
- 11. The NERC cause code for the outage;
- 12. State whether any Root Cause Evaluations or any other outage evaluations of this outage were conducted, or whether any internal audit reports were subsequently generated which addressed any aspect of this outage, given as "Yes" or "No", without quote marks, and provided in an

MS Excel text format:

13. State whether any modifications to preventive maintenance programs or schedules were made, as a result of this outage, given as "Yes" or "No", without quote marks, and provided in an MS Excel text format; and 14. For each facility, provide each of the facility units' appropriate CAISO price node (PNode). If the facility has no multiple units, provide the facility's CAISO PNode.

#### **Response to Question 1.1.11.c:**

Please refer to the file attached to Question 1.1.1.b for the responses to Questions 1.1.11.1 through 1.1.11.2; and 1.1.11.9 through 1.1.11.14. See the tab named Q1.1.11.

The responses to Questions 1.1.11.3 through 1.1.11.8 are no longer required per D.15-03-023; wherein it was ordered that "SCE will provide the NERC Event Code data for all outages incurred at power plants having a rated capacity exceeding 25 MW, in lieu of Master Data Request Questions 1.1.12.3 through 1.1.12.8 and 1.1.14.3 through 1.1.14.8 as SCE does not maintain all of the data required to answer these questions. SCE will also include a description of why SCE chose the particular NERC Event Code."

NOTE: The numbering referenced in D.15-03-023 has been changed; CalPA MDR question 1.1.12 is now 1.1.11 and 1.1.14 is now 1.1.12.

PubAdv-SCE-001-MDR 1: 1.1.11.c

Page 3 of 3

1.1.11.13	PM Program or Schedule Modifications as a Result of Outage	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	o <sub>Z</sub>	o Z	
1.1.11.12	Root Cause or Other Outage Evaluations Conducted	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	N	N	
1.1.11.11	NERC Cause Code	4899	4840	7121	4840	7121	7050	7121	3620	4840	4590	4899	4840	4899	7140	7140	4899	4840	4899	4535	7008	4840	4551	7050	4840	4602	4602	1
1.1.11.10	End	6/27/2024 12:26	1/26/2024 15:30	Continued into 2025	2/1/2024 16:03	3/14/2024 16:38	5/30/2024 17:21	Continued into 2025	10/25/2024 8:57	2/16/2024 16:58	3/8/2024 12:52	6/12/2024 11:10	2/29/2024 23:59	6/19/2024 11:49	10/2/2024 14:57	3/29/2024 15:44	6/26/2024 12:13	1/25/2024 16:50	7/3/2024 15:28	7/30/2024 7:54	12/13/2024 12:21	2/23/2024 18:16	8/23/2024 9:24	11/26/2024 17:22	3/15/2024 17:09	6/25/2024 13:17	9/10/2024 14:33	
1.1.11.9	Start	6/23/2024 7:44	1/22/2024 7:10	10/14/2024 7:43	1/29/2024 7:22	12/1/2023 0:00	5/29/2024 7:37	10/14/2024 14:28	10/21/2024 7:18	2/5/2024 7:29	3/4/2024 7:00	6/2/2024 7:21	2/12/2024 6:09	6/9/2024 7:19	10/1/2024 7:00	3/25/2024 8:05	6/16/2024 7:11	1/8/2024 11:41	6/23/2024 6:33	4/3/2024 8:06	11/4/2024 7:00	2/12/2024 7:36	8/19/2024 6:10	10/1/2024 7:00	3/4/2024 7:00	6/24/2024 7:48	9/9/2024 7:09	
1.1.11.8	Nature of Initial Time Duration	N/A		N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	
1.1.11.7	Initial Time Duration (hrs)	N/A		N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	
1.1.11.6	Nature of Date Initially Scheduled	N/A		N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	
1.1.11.5	Date Outage Initially Scheduled	N/A		N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	
1.1.11.4	Nature of Date First Scheduled	N/A		N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	
1.1.11.3	Date Outage First Scheduled	N/A		N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	
1.1.11.2	Unit	4	4	1	2	4	2	2	c	1	1	1	2	2	2	e	e	4	4	Ŋ	1	1	1	1	1	1	2	
1.1.11.1	Plant	Big Creek PH 1	Big Creek PH 1	Big Creek PH 2	Big Creek PH 2	Big Creek PH 1	Big Creek PH 2	Big Creek PH 2	Big Creek PH 2	Big Creek PH 3	Big Creek PH 3	Big Creek PH 3	Big Creek PH 3	Big Creek PH 3	Big Creek PH 3	Big Creek PH 3	Big Creek PH 3	Big Creek PH 3	Big Creek PH 3	Big Creek PH 3	Big Creek PH 4	Big Creek PH 8	Eastwood	Eastwood	Mammoth Pool	Mammoth Pool	Mammoth Pool	

CAISO Price Node (Pnode)

| FOU_BIGCRN_Z_EAE3WU-AFIND | POD BIGCRK 2 EXESWD-APIND | POD_BIGCRK_2_EXESWD-APND | POD_EASTWD_7_UNIT-APND | POD_EASTWD_7_UNIT-APND | POD_BIGCRK_2_EXESWD-APND | POD_BIGCRK_2_EXESWD-APND | POD_BIGCRK_2_EXESWD-APND |  |
|---------------------------|---------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|------------------------|------------------------|--------------------------|--------------------------|--------------------------|--|

#### Southern California Edison A,25-04-001 – 2024 ERRA Review

#### DATA REQUEST SET PubAdv-S CE-001-MDR 1

To: Public Advocates Office
Prepared by: Farimah Shirmohammadi
Job Title: Senior Specialist
Received Date: 2/3/2025

**Response Date: 4/3/2025** 

#### **Question 1.1.12.c:**

For each and every plant of 25 MW capacity or greater, and each unit of plants with multiple units, which incurred an outage during the Record Period of 24 hours duration or longer, which such outage was scheduled 45 or fewer days prior to the commencement of the outage, identify each and every such outage, specifying:

- c) Hydroelectric plants,
- 1. The text label for the plant at which the outage occurred;
- 2. The text label for the unit of the plant at which the outage occurred, (if all units were similarly affected, you may identify the unit as "All," otherwise list unit outages separately);
- 3. The date, given in MS Excel date/time serial format, at which this outage was first scheduled, if scheduled in advance, or reported to management, if not scheduled in advance, if the actual date is not known, then provide a best-effort estimate:
- 4. Identify, with a text entry of "Actual" or "Estimated," the nature of the date provided in response to the previous question;
- 5. The date, in MS Excel date serial number format, on which this outage was initially scheduled to begin, when first scheduled, or the MS Excel NA() function, if not scheduled in advance, if the actual date is not known, then provide a best-effort estimate;
- 6. Identify, with a text entry of "Actual" or "Estimated," the nature of the date provided in response to the previous question;
- 7. The time duration, in days, provided in an MS Excel number format, for which this outage was initially scheduled to last, when first scheduled, if scheduled in advance, or as initially estimated, when first reported to management, if not scheduled in advance, if the actual initially-scheduled duration is not known, then provide a best-effort estimate;
- 8. Identify, with a text entry of "Actual" or "Estimated," the nature of the duration provided in response to the previous question;
- 9. The date and hour ("hour ending" form), given in MS Excel date/time serial format, the outage began;
- 10. The date and hour ("hour ending" form), given in MS Excel date/time serial format, the outage ended;
- 11. The NERC cause code for this outage, given in MS Excel text format;
- 12. State whether any Root Cause Evaluations or any other outage

evaluations of this outage were conducted, or whether any internal audit reports were subsequently generated which addressed any aspect of this outage, given as "Yes" or "No", without quote marks, and provided in an MS Excel text format;

13. State whether any modifications to preventive maintenance programs or schedules were made, as a result of this outage, given as "Yes" or "No", without quote marks, and provided in an MS Excel text format; and 14. For each facility, provide each of the facility units' appropriate CAISO price node (PNode). If the facility has no multiple units, provide the facility's CAISO PNode.

### **Response to Question 1.1.12.c:**

Please refer to the file attached to Question 1.1.1.b for the responses to Questions 1.1.12.1 through 1.1.12.2; and 1.1.12.9 through 1.1.12.14. See the tab named Q1.1.12.

The responses to Questions 1.1.12.3 through 1.1.12.8 are no longer required per D.15-03-023; wherein it was ordered that "SCE will provide the NERC Event Code data for all outages incurred at power plants having a rated capacity exceeding 25 MW, in lieu of Master Data Request Questions 1.1.12.3 through 1.1.12.8 and 1.1.14.3 through 1.1.14.8 as SCE does not maintain all of the data required to answer these questions. SCE will also include a description of why SCE chose the particular NERC Event Code."

NOTE: The numbering referenced in D.15-03-023 has been changed; CalPA MDR question 1.1.12 is now 1.1.11 and 1.1.14 is now 1.1.12.

PubAdv-SCE-001-MDR 1: 1.1.12.c

Page 3 of 3

1.1.12.1	1.1.12.2	1.1.12.3	1.1.12.4	1.1.12.5	1.1.12.6	1.1.12.7	1.1.12.8	1.1.12.9	1.1.12.10	1.1.12.11	1.1.12.12	1.1.12.13	1.1.12.14
1	10-10	Date Outage First	Nature of Date First	Date Outage Initially Nature of Date Initally	Nature of Date Initally		Nature of Time	1	1	NERC Cause	Root Cause or Other	PM Program or Schedule	
Plant	Tino.	Scheduled	Scheduled	Scheduled	Scheduled	Time Duration (hrs)	Duration	Start	End	Code	Outage Evaluations Conducted	Modifications as a Result of Outage	CAISO Price Node (Pnode)
Big Creek PH 8	2	N/A	N/A	N/A	N/A	N/A	N/A	9/5/2020 12:00	Extended into 2025	9010 (OMC)	No	No	POD_BIGCRK_2_EXESWD-APND
Eastwood	1	N/A	N/A	N/A	N/A	N/A	N/A	9/15/2022 10:59	7/15/2024 13:59	4810	No	No	POD_EASTWD_7_UNIT-APND
Nammoth Pool	2	N/A	N/A	N/A	N/A	N/A	N/A	3/3/2023 12:10	5/17/2024 17:36	9036 (OMC)	No	No	POD_BIGCRK_2_EXESWD-APND
ig Creek PH 3	5	N/A	N/A	N/A	N/A	N/A	N/A	11/11/2023 17:00	1/4/2024 12:05	7001	No	No	POD_BIGCRK_2_EXESWD-APND
Big Creek PH 3	ß	N/A	N/A	N/A	N/A	N/A	N/A	2/17/2024 13:22	3/12/2024 15:58	7099	No	No	POD_BIGCRK_2_EXESWD-APNE
Big Creek PH 3	4	N/A	N/A	N/A	N/A	N/A	N/A	3/30/2024 2:00	4/2/2024 16:41	3899	No	No	POD_BIGCRK_2_EXESWD-APND
lammoth Pool	1	N/A	N/A	N/A	N/A	N/A	N/A	4/4/2024 0:00	4/8/2024 0:00	7124	No	No	POD_BIGCRK_2_EXESWD-APND
lammoth Pool	1	N/A	N/A	N/A	N/A	N/A	N/A	4/20/2024 19:08	4/23/2024 18:36	7124	No	No	POD_BIGCRK_2_EXESWD-APND
ig Creek PH 3	1	N/A	N/A	N/A	N/A	N/A	N/A	5/6/2024 13:54	5/17/2024 17:40	4710	No	No	POD_BIGCRK_2_EXESWD-APND
Eastwood	1	N/A	N/A	N/A	N/A	N/A	N/A	9/4/2024 0:00	9/7/2024 13:30	7121	No	No	POD_BIGCRK_2_EXESWD-APND
Eastwood	1	N/A	N/A	N/A	N/A	N/A	N/A	9/18/20248:00	9/20/2024 22:09	7121	No	No	POD_BIGCRK_2_EXESWD-APND
lammoth Pool	2	N/A	N/A	N/A	N/A	N/A	N/A	11/30/2024 21:13	Continued into 2025	4555	No	No	POD_BIGCRK_2_EXESWD-APND
lammoth Pool	1	N/A	N/A	N/A	N/A	N/A	N/A	11/30/2024 21:28	12/3/2024 10:11	4555	No	No	POD_BIGCRK_2_EXESWD-APND
Eastwood	1	N/A	N/A	N/A	N/A	N/A	N/A	12/2/292411:37	12/3/2024 17:49	7140	No	No	POD_BIGCRK_2_EXESWD-APND
Eastwood	<b>+</b>	N/A	N/A	N/A	N/A	N/A	N/A	12/11/2024 15:00	12/12/2024 15:55	7140	No	Š	POD BIGCRK 2 EXESWD-APND

## SCE ERRA 2024 Section I\_DR-CBP-DA\_CONFIDENTIAL.xlsx

(Confidential)

## SCE ERRA 2024 Section I\_DR-LCR\_ACES\_CONFIDENTIAL.xlsx

(Confidential)

## SCE ERRA 2024 Section I\_DR-LCR\_AMS\_CONFIDENTIAL.xlsx

(Confidential)

## SCE ERRA 2024 Section I\_DR-LCR\_STEM\_CONFIDENTIAL.xlsx

(Confidential)

## SCE ERRA 2024 Section I\_DR-SDP\_CONFIDENTIAL.xlsx

(Confidential)

## SCE ERRA 2024 Section I\_DR-SEP\_CONFIDENTIAL.xlsx

(Confidential)

## SCE ERRA 2024 CalAdv WP DR Combined CONFIDENTIAL.xlsx

(Confidential)

## 2023 SCE-03 Ch I. Section D.1\_DLAP Awards and Prices\_CONFIDENTIAL.xlsx

(Confidential)

### LIST OF ATTACHMENTS FOR CHAPTER 3

#	Attachment	Description
1	Attachment 3.1 (Confidential)	SCE's Response to Cal Advocate's Data Request #17, Questions 1-32.
	(Confidential)	
2	Attachment 3.2	SCE's Response to Cal Advocate's Data Request #17,
	(Confidential)	Questions 34-215.
3	Attachment 3.3	SCE's Response to Cal Advocate's Data Request #21,
		Questions 1-4.

### **ATTACHMENT 3.1**

# SCE's Response to Cal Advocate's Data Request #17, Questions 1-32

(Confidential)

### **ATTACHMENT 3.2**

# SCE's Response to Cal Advocate's Data Request #17, Questions 34-215

(Confidential)

### **ATTACHMENT 3.3**

# SCE's Response to Cal Advocate's Data Request #21, Questions 1-4

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.01:**

Cal Advocates submits the following requests to clarify certain responses provided by SCE to Cal Advocates' Data Request No. 17, served on October 2, 2025. In regard to Data Request 17, Question 045, the images of the following JPG file names were provided in SCE response to question # 045:

- a. 45 U4 STG Protective Relays.jpg
- b. 45 U4B 18kv Breaker 1.jpg
- c. 45\_U4B 18kv Breaker 2.jpg
- d. 45\_U4B 18kv Breaker 3.jpg
- e. 45 U4B 18kv Protection Relays 1.jpg
- f. 45 U4B 18kv Protection Relays 2.jpg
- g. 45 U4B 18kv Protection Relays 3.jpg

However, the images received by Cal Advocates were not labeled. As a result, it is not discernible from the images as what equipment to which SCE is referring in each image, and what the differences are among the images. For example, image "a" looks similar to image "e" to image "g", and images, "b", "c" and "d", all look similar.

1. Where in the above images are the following items as referenced in the DR responses?

### **Response to Question Q.01:**

Reference images/documents attached.

- U4B 18kV Breaker 1 Labeled.jpg
- U4B 18kV Breaker 2 Labeled.jpg
- U4B 18kV Breaker 3 Labeled.jpg
- U4B 18kV Protection Relays 1 Labeled.jpg
- U4B 18kV Protection Relays 2 Labeled.jpg
- U4B 18kV Protection Relays 3 Labeled.jpg
- U4 STG Protection Relays Labeled.jpg

As part of this response, SCE is also providing the following documents, which were previously provided in data request PubAdv-SCE-017, in response to 2. i, j, k, and n.

- LNP Advisory Clarification Photos.pdf
- Electroswitch LockOut Relay Diagram.pdf
- Mountainview U4 1.docx

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.02.a:**

- 2. Please resubmit the images identified above and label them to clearly show:
- a. 18 kV breaker (referenced in the response to question #040)

### **Response to Question Q.02.a:**

- U4B 18kV Breaker 1 Labeled.jpg
- U4B 18kV Breaker 2 Labeled.jpg
- U4B 18kV Breaker 3 Labeled.jpg

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### Question Q.02.b:

- 2. Please resubmit the images identified above and label them to clearly show:
- b. 86RE relay/86 device (referenced in the response to question #040, 063, 068, 069, 075)

### **Response to Question Q.02.b:**

- U4B 18kV Protection Relays 2 Labeled.jpg
- U4B 18kV Protection Relays 3 Labeled.jpg
- U4 STG Protection Relays Labeled.jpg

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.02.c:**

- 2. Please resubmit the images identified above and label them to clearly show:
- c. Beckwith relay (referenced in the response to question #072, 075)

### **Response to Question Q.02.c:**

- U4B 18kV Protection Relays 1 Labeled.jpg
- U4B 18kV Protection Relays 3 Labeled.jpg
- U4 STG Protection Relays Labeled.jpg

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.02.d:**

- 2. Please resubmit the images identified above and label them to clearly show:
- d. Basler relay (referenced in the response to question #075)

### **Response to Question Q.02.d:**

The Basler relay on the impacted unit is located inside the U4B 18kV Generator Circuit Breaker cabinet shown in image U4B 18kV Breaker 3 Labeled.jpg attached to question 1 of this data request.

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.02.e:**

- 2. Please resubmit the images identified above and label them to clearly show:
- e. CTG 18 kV breaker relay (referenced in the response to question #062)

### **Response to Question Q.02.e:**

The CTG 18kV Breaker Relay equipment is captured and labeled under the following images attached to question 1 of this data request.

- U4B 18kV Protection Relays 1 Labeled.jpg LEFT SIDE PANEL VIEW
- U4B 18kV Protection Relays 2 Labeled.jpg RIGHT SIDE PANEL VIEW
- U4B 18kV Protection Relays 3 Labeled.jpg FULL PANEL (LEFT AND RIGHT TOGETHER) VIEW

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.02.f:**

- 2. Please resubmit the images identified above and label them to clearly show:
- f. Electroswitch relay (referenced in the response to question #066, 075)

### **Response to Question Q.02.f:**

Electroswitch is an equipment manufacturer. All 86 lockout devices related to this incident are manufactured by Electroswitch.

- U4B 18kV Protection Relays 2 Labeled.jpg
- U4B 18kV Protection Relays 3 Labeled.jpg
- U4 STG Protection Relays Labeled.jpg

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.02.g:**

- 2. Please resubmit the images identified above and label them to clearly show:
- g. General Electric DBF relay (referenced in the response to question #075)

### Response to Question Q.02.g:

Reference the following images/documents attached to question 1 of this data request.

• U4B 18kV Protection Relays 1 Labeled.jpg

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.02.h:**

- 2. Please resubmit the images identified above and label them to clearly show:
- h. General Electric IFV51 relay (referenced in the response to question #075)

### Response to Question Q.02.h:

Reference the following images/documents attached to question 1 of this data request.

• U4B 18kV Protection Relays 2 Labeled.jpg

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.02.i:**

- 2. Please resubmit the images identified above and label them to clearly show:
- i. Lighted face plate (referenced in the response to question #089)

### Response to Question Q.02.i:

- U4B 18kV Protection Relays 2 Labeled.jpg
- U4B 18kV Protection Relays 3 Labeled.jpg
- U4 STG Protection Relays Labeled.jpg
- LNP Advisory Clarification Photos.pdf, Page 3 "New LNP for LORs Post 2008"
- Electroswitch LockOut Relay Diagram.pdf

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### Question Q.02.j:

- 2. Please resubmit the images identified above and label them to clearly show:
- j. Main transformer (referenced in the response to question #040)

### Response to Question Q.02.j:

This information was previously provided in the document titled Mountainview U4\_1.docx, which has been attached to question 1 of this data request.

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.02.k:**

- 2. Please resubmit the images identified above and label them to clearly show:
- k. PECC (referenced in the response to question #046)

### Response to Question Q.02.k:

This information was previously provided in the document titled Mountainview U4\_1.docx, which has been attached to question 1 of this data request.

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.02.1:**

- 2. Please resubmit the images identified above and label them to clearly show:
- 1. Protective relay ((referenced in the response to question #067)

### **Response to Question Q.02.1:**

All protective relay equipment is captured and labeled under the following images/documents attached to question 1 of this data request.

- U4B 18kV Protection Relays 1 Labeled.jpg
- U4B 18kV Protection Relays 2 Labeled.jpg
- U4B 18kV Protection Relays 3 Labeled.jpg
- U4 STG Protection Relays Labeled.jpg

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.02.m:**

2. Please resubmit the images identified above and label them to clearly show:

m. SEL 300G relay (referenced in the response to question #071, 075)

### **Response to Question Q.02.m:**

- U4B 18kV Protection Relays 1 Labeled.jpg
- U4 STG Protection Relays Labeled.jpg

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### Question Q.02.n:

- 2. Please resubmit the images identified above and label them to clearly show:
- n. STABB (referenced in the response to question #046)

### **Response to Question Q.02.n:**

This information was previously provided in the document titled Mountainview U4\_1.docx, which has been attached to question 1 of this data request.

Note: SCE inadvertently referred to this as **STABB** in its response to data request PubAdv-SCE-017. The correct reference is STAB.

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.03:**

3. In the images that are resubmitted with the above items identified, please also label all other appurtenances not mentioned above that are relevant to the July 2024 Mountainview GS Unit 4B outage incident.

### **Response to Question Q.03:**

All appurtenances relevant to the July 2024 Mountainview GS Unit 4B outage incident have been identified in the images provided in this data request.

### DATA REQUEST SET PubAdv-SCE-021

To: Public Advocates Office Prepared by: Lyle Laven Job Title: Senior Manager Received Date: 11/10/2025

**Response Date: 11/18/2025** 

### **Question Q.04:**

4. In regard to Data Request 17, Question 046, what do the abbreviations, PEECC and STABB, stand for?

### **Response to Question Q.04:**

PEECC (Packaged Electronic/Electrical Control Compartment)

The PEECC is a secure, environmentally controlled enclosure that houses critical electrical and control systems for the gas turbine auxiliaries. It typically contains turbine control panels, motor control centers, protective relays, battery and direct current (DC) power systems, chargers, uninterruptible power supply (UPS) units, and associated monitoring and communication equipment. These systems ensure reliable operation, protection, and control of the gas turbine and its auxiliary components. There are a total of four PEECCs at Mountainview: 3A PEECC, 3B PEECC, 4A PEECC, and 4B PEECC.

STAB (Steam Turbine Auxiliary Building)

The Steam Turbine Auxiliary Building is a secure, environmentally controlled facility that houses critical electrical and control systems for the steam turbine and generator. It typically contains generator and transformer protection equipment, switchgear and circuit breakers, turbine and excitation control systems, battery and DC power systems, UPS units, and communication and monitoring infrastructure. These systems ensure reliable operation, protection, and control of the turbine-generator unit and its associated electrical components. There are a total of two STABs at Mountainview: Unit 3 STAB and Unit 4 STAB.

Note: SCE inadvertently referred to this as STABB in its response to data request PubAdv-SCE-017. The correct reference is STAB.

### LIST OF ATTACHMENTS FOR CHAPTER 4

#	Attachment	Description
1	Attachment 4.1 (Confidential)	SCE's Response to Cal Advocate's Data Request Set CalAdv-SCE-016, Question 2.
2	Attachment 4.2 (Confidential)	SCE's Response to Cal Advocate's Data Request Set CalAdv-SCE-016, Question 3.
3	Attachment 4.3 (Confidential)	SCE's Response to Cal Advocate's Data Request Set CalAdv-SCE-016, Question 4.
4	Attachment 4.4 (Confidential)	SCE's Response to Cal Advocate's Data Request Set CalAdv-SCE-020, Question 2.
5	Attachment 4.5 (Confidential)	SCE's Response to Cal Advocate's Data Request Set CalAdv-SCE-020, Question 3.

# **ATTACHMENT 4.1**

# SCE's Response to Cal Advocate's Data Request Set CalAdv-SCE-016, Question 2

(Confidential)

### DATA REQUEST SET CalAdv-SCE-016

To: Public Advocates Office
Prepared by: Nicole Avendano
Job Title: Energy Trading Contract Administrator
Received Date: 9/29/2025

Response Date: 10/14/2025

### Question Q.02:

SCE-03, Ch. II, at 88 references a Letter Agreement with MM Tulare Energy, LLC: "SCE and 8 MM Tulare Energy, LLC executed a Letter Agreement on February 12, 2024 to establish a monthly payment plan for the Guaranteed Energy Production Damages due SCE for Performance Measurement Period 5."

- a. State the total amount of Guaranteed Energy Production Damages assessed for Performance Measurement Period 5 prior to the amendment.
- b. Provide the calculation of damages, including all supporting workpapers that show how damages were determined.
  - c. Provide the agreed-upon payment schedule (monthly amounts, term length, start/end dates).
  - d. Identify whether interest, late fees, or other financial adjustments apply under the plan.
- e. Explain how the monthly payment plan affects ratepayers compared to a lump-sum damages payment.

### Response to Question Q.02:

### CONFIDENTIAL

This Response And The Attachment(s) Are Marked Confidential In Accordance With Applicable Law and Regulation. Basis for Confidentiality In Accompanying Confidentiality Declaration. Public Disclosure Restricted.

2.

- a. The total amount of Guaranteed Energy Production Damages assessed for Performance Measurement Period 5, prior to the amendment, is
- b. See attached file titled "CONFIDENTIAL-1245\_Guaranteed Energy Production Damages Period 5 (08 23 21-08 22 23).xlsx".
- c. Under the Letter Agreement, SCE shall subtract per month from the amounts that would otherwise be due MM Tulare Energy, LLC for each of the months of SCE shall subtract a final payment of the remaining balance of from the amount that would otherwise be due MM Tulare Energy, LLC for the month of Italian In the Interest Inte

any subsequent monthly payment invoice or separately invoiced to MM Tulare Energy, LLC. Within 60 days after the payment in full of total damages, SCE shall calculate the simple interest accrued on the damages at the interest rate specified in the contract, beginning on the Letter Agreement effective date and continuing to but excluding the date the damages are paid in full. SCE shall provide notice of the interest payment owed by MM Tulare Energy, LLC and shall net the interest payment from the amounts that would otherwise be due to MM Tulare Energy, LLC under the contract. The interest payment was calculated to be

- d. As stated in the response to part c. above, simple interest accrued on the damages at the interest rate specified in the contract, beginning on the Letter Agreement effective date and continuing to but excluding the date the damages are paid in full, apply under the plan.
- e. Acknowledging that a lump sum payment could be more favorable to ratepayers than a payment plan all other things being equal, a lump sum in this situation would bring substantial risk that the project would not remain financially viable because the damage amount is significantly more than its average generation payment. Thus, the payment plan allows the project to continue operations, meeting its financial obligations, while ratepayers benefit from payment of the full replacement damage amount with interest.

# **ATTACHMENT 4.2**

# SCE's Response to Cal Advocate's Data Request Set CalAdv-SCE-016, Question 3

(Confidential)

### DATA REQUEST SET CalAdv-SCE-016

To: Public Advocates Office
Prepared by: Nicole Avendano
Job Title: Energy Trading Contract Administrator
Received Date: 9/29/2025

Response Date: 10/14/2025

### Question Q.03:

SCE-03, Ch. II, at 93 references a Letter Agreement with Antelope DSR 3, LLC: "SCE and Antelope DSR 3 executed a Letter Agreement on May 14, 2024 to "establish a monthly payment plan for a Product Replacement Damage Amount due SCE for the Calculation Period ending September 30, 2023."

- a. State the total amount of Product Replacement Damages established in the amendment, as well as what was assessed prior to the amendment.
- b. Provide the calculation of damages, including all supporting workpapers that show how damages were determined.
  - c. Provide the agreed-upon payment schedule (monthly amounts, term length, start/end dates).
  - d. Identify whether interest, late fees, or other financial adjustments apply under the plan.
- e. Explain how the monthly payment plan affects ratepayers compared to a lump-sum damages payment.

### Response to Question Q.03:

### CONFIDENTIAL

This Response And The Attachment(s) Are Marked Confidential In Accordance With Applicable Law and Regulation. Basis for Confidentiality In Accompanying Confidentiality Declaration. Public Disclosure Restricted.

3.

- a. The total Product Replacement Damages amount assessed prior to execution of the amendment was \_\_\_\_\_\_ This amount was collected over 11 months following execution of the amendment, commencing with SCE's payment to Seller for April 2024. Applicable interest was also assessed subsequent to execution of the amendment in the amount of \_\_\_\_\_\_ with the final 11<sup>th</sup> payment.
- b. Please see attached file titled "CONFIDENTIAL 5262 Antelope DSR 3 Guaranteed Energy Production Damages Details.xlsx".
- c. Seller agreed to pay 10 monthly payments of (commencing with SCE's April 2024 statement) and a final 11<sup>th</sup> payment in the amount of plus, plus applicable interest of (commencing with SCE's plus).

CalAdv-SCE-016: Q.03 Page **2** of **2** 

d. Seller agreed to applicable interest in exchange for SCE agreeing to Seller paying the damage amount over 11 months.

e. Acknowledging that a lump sum payment could be more favorable to ratepayers than a payment plan all other things being equal, a lump sum in this situation would bring with it the substantial risk that the project would not remain financially viable because the damage amount is significantly more than its average generation payment. Thus, the payment plan allows for the project to continue operation, meeting its financial obligations, while ratepayers benefit from payment of the full replacement damage amount with interest on the monthly payments.

# **ATTACHMENT 4.3**

# SCE's Response to Cal Advocate's Data Request Set CalAdv-SCE-016, Question 4

(Confidential)

### DATA REQUEST SET CalAdv-SCE-016

To: Public Advocates Office
Prepared by: Nicole Avendano
Job Title: Energy Trading Contract Administrator
Received Date: 9/29/2025

**Response Date: 10/14/2025** 

### **Question Q.04:**

SCE-03, Ch. II, Table II-27 references a Force Majeure claim made by Calleguas Municipal Water District: "On March 14, 2024, SCE denied the Force Majeure claim. Seller notified SCE of disagreement with denial of claim. SCE is currently in review of the situation."

- a. State the specific contract provisions cited by Calleguas in making the claim.
- b. Provide a timeline of SCE's "ongoing review," including current status, anticipated next steps, and expected resolution date.
  - c. Quantify the potential financial impact of the claim, if granted.

### **Response to Question Q.04:**

#### CONFIDENTIAL

This Response Is Marked Confidential In Accordance With Applicable Law and Regulation.

Basis for Confidentiality In Accompanying Confidentiality Declaration.

Public Disclosure Restricted.

4.

- a. Calleguas cited paragraph 11.4 Termination and the definition of Force Majeure appearing in Appendix A of the contract.
  - i. 11.4 Termination. Either Party may terminate this Agreement on at least five (5) Business Days' prior Notice, in the event of Force Majeure which materially interferes with such Party's ability to perform it obligations under this Agreement and which (a) extends for more than 365 consecutive days, (b) extends for more than a total of 365 days in any consecutive 540-day period, or (c) causes the Commercial Operation Date to fail to be demonstrated by the Guaranteed Commercial Operation Date.
  - ii. "Force Majeure" means any occurrence that was not anticipated as of the Execution Date that:
    - 1. In whole or in part:
      - a. Delays a Party's performance under this Agreement;
      - b. Causes a Party to be unable to perform its obligations; or
      - c. Prevents a Party from complying with or satisfying the conditions of this Agreement;
    - 2. Is not within the control of that Party; and

3. The Party has been unable to overcome by the exercise of due diligence, including an act of God, flood, drought, earthquake, storm, fire, pestilence, lightning and other natural catastrophes, epidemic, war, riot, civil disturbance or disobedience, terrorism, sabotage, strike or labor dispute, or curtailment or reduction in deliveries at the direction of a Transmission/Distribution Owner or the CAISO (except as set forth below).

### iii. Force Majeure does not include:

- 1. The lack of wind, sun or other fuel source of an inherently intermittent nature:
- 2. Reductions in generation from the Facility resulting from ordinary wear and tear, deferred maintenance or operator error;
- 3. Curtailment or reduction in deliveries at the direction of a Transmission/Distribution Owner or the CAISO when the basis of the curtailment or reduction in deliveries ordered by a Transmission/Distribution Owner or the CAISO is congestion arising in the ordinary course of operations of the Transmission/Distribution Owner's system or the CAISO Grid, including congestion caused by outages or capacity reductions for maintenance, construction or repair; or
- 4. Any delay in providing, or cancellation of, interconnection service by a Transmission/Distribution Owner or the CAISO, except to the extent such delay or cancellation is the result of a force majeure claimed by the Transmission/Distribution Owner or the CAISO.
- b. On March 19, 2025, SCE presented an option for Calleguas to shift the project from the existing Re-MAT contract to a PURPA Standard Offer Contract (SOC), which does not contain a Guaranteed Energy Production Damages provision. The shift would be effectuated via the execution of a new PURPA SOC concurrently with the mutual termination of the existing Re-MAT contract. On April 21, 2025, Calleguas confirmed that it desired to move forward with this option, and Calleguas is currently in the process of collecting the information necessary to submit a PURPA application to SCE to initiate the contracting process.
- c. As the Calleguas project was no longer anticipated to provide sufficient generation to meet the contract's guaranteed energy production threshold, Calleguas was expected to continue to receive financial penalties, which, because of the magnitude of the penalties in comparison to the contract revenue, Calleguas was not expected to be able to pay. Therefore, the assumption, under this base case scenario, was that the Calleguas project would not remain financially viable and would default under the contract, in which case SCE would retain the cash collateral currently in its possession in the amount of the contract, with SCE likely returning the cash

CalAdv-SCE-016: Q.04 Page 3 of 3

collateral, leading to a loss of of value. However, under the proposed framework to move Calleguas from Re-MAT to PURPA, described in part b. above, SCE calculated the PURPA contract to yield of value to SCE customers, on a net present value basis, which equates to a net benefit of as compared to the scenario under which Calleguas would default under the contract.

# **ATTACHMENT 4.4**

# SCE's Response to Cal Advocate's Data Request Set CalAdv-SCE-020, Question 2

(Confidential)

### DATA REQUEST SET PubAdv-SCE-020

To: Public Advocates Office Prepared by: Nicole Avendano Job Title: Specialist Received Date: 10/16/2025

**Response Date: 10/30/2025** 

### **Question Q.02:**

SCE03C, Ch. II, Table II 20 references an amendment to increase capacity price in a contract with Watson Cogeneration Company in order to be in line with the RA market price.

a. What was the original capacity price and what was it increased to?

### **Response to Question Q.02:**

### CONFIDENTIAL

This Response Is Marked Confidential In Accordance With Applicable Law and Regulation.

Basis for Confidentiality In Accompanying Confidentiality Declaration.

Public Disclosure Restricted.

# **ATTACHMENT 4.5**

# SCE's Response to Cal Advocate's Data Request Set CalAdv-SCE-020, Question 3

(Confidential)

### DATA REQUEST SET PubAdv-SCE-020

To: Public Advocates Office Prepared by: Nicole Avendano Job Title: Specialist Received Date: 10/16/2025

**Response Date: 10/30/2025** 

### **Question Q.03:**

SCE03C, Ch. II, at p.122 references an amendment to a contract with Peregrine Energy Storage LLC in order to address a "price increase to manage increased costs."

- a. What was the price increased on?
- b. What was the original price and what was it increased to?

### **Response to Question Q.03:**

### CONFIDENTIAL

This Response Is Marked Confidential In Accordance With Applicable Law and Regulation.

Basis for Confidentiality In Accompanying Confidentiality Declaration.

Public Disclosure Restricted.

a.	The price increase was on the Monthly RA Capacity Price.
b.	

### LIST OF ATTACHMENTS FOR CHAPTER 5

#	Attachment	Description
1	Attachment 5.1	SCE Responses to Data Requests.pdf
	Attachment 5.2	DR18 Q1 – HIDERCFBA.xlsx
2		(Available via Email)
	Attachment 5.3	Response to 2024 ERRA Review DR8 Q2-BRRBA.xlsx
3		(Available via Email)
	Attachment 5.4	BRRBA Closing Sheet – Confidential
4	(Confidential)	(Available via Email)

# ATTACHMENT 5.1 SCE Responses to Data Requests

### DATA REQUEST SET PubAdv-SCE-003

To: Public Advocates Office Prepared by: Edison Wong Job Title: Accounting Advisor Received Date: 6/23/2025

Response Date: 7/8/2025

### **Question 17:**

In Workpaper "2024 HiDERCFBA GL Details", there is \$19,163 recorded to G/L account 591050 for "Overhead."

a. Please explain how the Overhead costs are related to consulting services.

### **Response to Question 17:**

The overhead costs were unrelated to the consulting services and were inadvertently recorded. SCE will correct the error in Record Year 2025.

### DATA REQUEST SET PubAdv-SCE-018

To: Public Advocates Office Prepared by: Alexandra C Szetoyu Job Title: Senior Accountant Received Date: 10/8/2025

**Response Date: 10/22/2025** 

### **Question Q.01:**

In response to Cal Advocates DR 03, Question 17, SCE stated "The overhead costs [in the HiDERCFBA] were unrelated to the consulting services and were inadvertently recorded. SCE will correct the error in Record Year 2025."

- a. Please confirm if this correction was made after the date of SCE's response (7/8/25).
- b. If so, please provide support (screenshots, journal entries, etc.) of this correction.

### **Response to Question Q.01:**

The overhead costs were corrected in July 2025.

See attached "DR18 Q1 - HIDERCFBA.xlsx".

### DATA REQUEST SET PubAdv-SCE-008

To: Public Advocates Office Prepared by: Edison Wong Job Title: Accounting Advisor Received Date: 7/30/2025

**Response Date: 8/13/2025** 

### **Question 02:**

- 2. In SCE's response to DR 03, Q 12, SCE states that the \$1.276M CARB costs "were inadvertently recorded to other accounts."
- a. Please provide the "other accounts" these costs were recorded, the length of time these costs we recorded in these "other accounts," and relevant interest calculations for the inadvertently recorded costs.

### **Response to Question 02:**

Please see the attached file "Response to 2024 ERRA Review DR8 Q2-BRRBA.xlsx."

### DATA REQUEST SET PubAdv-SCE-001-MDR 1

To: Public Advocates Office Prepared by: Kimwuana Blebu Job Title: Senior Advisor Received Date: 2/3/2025

**Response Date: 4/3/2025** 

#### Question 1.3.3:

Provide a brief summary (e.g., one page) of the significant accounting controls applicable to each BA/MA submitted in this proceeding.

### **Response to Question 1.3.3:**

### **Review of Balancing Account Charges (Process 7.8/Control #4)**

RA&A accountants generate monthly balancing account closing worksheets that include all revenues and recoverable expenses included in the balancing accounts. Source documents for the worksheets are maintained including SAP closing tool worksheet (T-code ZFI\_BA\_CLOSE), billed and unbilled revenue schedules, BEX or AFE reports for O&M expenses, and Capital Models. RA&A accountants verify the SAP closing tool worksheet tie to supporting worksheets/reports. After a reasonableness review, the RA&A Accountants park the balancing account journal entries in SAP.

The RA&A Manager compares the costs and revenues in the various balancing accounts against the supporting documents and ensures all revenues and recoverable expenses are recorded in the proper category in the net revenue sheet. The RA&A Manager verifies the accuracy of the calculations and corresponding journal entries and posts them to the General Ledger as approval.

# Review of Balancing Account Billed and Unbilled Revenue (Process 7.8/Control# 34, 17, 28, 21)

On a monthly basis, the RA&A Manager reviews total billed revenues (SCE and CDWR) on the billed revenue spreadsheets against the base and unbundled total billed revenue report and the revenue control report from SAP BW. If the amounts do not agree, the RA&A Manager works with Reg. Ops and other appropriate parties to resolve any differences.

At the end of the month, the Manager – Regulatory Accounting generates and reviews the Unbilled Revenue Report and the NEM Revenue Report from BW to validate the monthly unbilled revenue accrual is reasonable prior to the journal entries being posted in SAP ECC. Any adjustment that is required is reviewed and approved by the Principal Manager - Regulatory Accounting.

On a monthly basis, State Regulatory Operations generates the unbundled billed revenue report from SAP BW and reviews it for inconsistency with the forecasted unbundled revenue. Any material variance is noted and correction actions are performed.

During the month-end close process, the Principal Manager – Regulatory Operations reviews and approves the unbilled revenue accrual prior to the journal entries being posted in SAP ECC. Any issues are investigated prior to approval.

### **Review of Interest Rate (Process 7.8/Control #5)**

The interest calculation is automated in the tool which is driven by the (T-code) ZFI\_BA\_INT\_RATE. Interest rates are updated each month based on the 3-month nonfinancial commercial paper rate and FERC annual rate. Interest rates are maintained for Interest Codes for specific period. The interest rate methodology to be used for each balancing account is included in the preliminary statement. The assigned RA&A Accountant will update the interest rate table and obtain approval from the RA&A Manager.

### DATA REQUEST SET CalAdv-SCE-015

To: Cal Advocates
Prepared by: Kimwuana Blebu
Job Title: Senior Advisor
Received Date: 9/17/2025

**Response Date: 10/1/2025** 

### **Question Q.01-Q.02:**

- 1. In response to Cal Advocates Master Data Request, Question 1.3.3, SCE stated "RA&A accountants generate monthly balancing account closing worksheets that include all revenues and recoverable expenses included in the balancing accounts."
- a. Please explain if "recoverable expenses" includes interest?
- 2. In response to Cal Advocates Master Data Request, Question 1.3.3, SCE stated "The RA&A Manager verifies the accuracy of the calculations and corresponding journal entries and posts them to the General Ledger as approval."
- a. Please explain if this verification of accuracy includes ensuring the account for which the interest is calculated is the correct balancing or memorandum account for which the interest should be recorded.

### **Response to Question Q.01-Q.02:**

- la. The term "recoverable expenses," as referenced in the monthly balancing account closing worksheets, pertains specifically to revenue and expenses recorded in the balancing accounts and does not include interest. However, when SCE seeks recovery of the balancing account balances, interest is included as part of the overall recovery request through the balancing account mechanism.
- 2a. Yes, for the verification process, the Manager reviews and verifies that the account interest calculation is accurate and correctly recorded to the appropriate balancing or memorandum account.

# ATTACHMENT 5.2 DR18 Q1 – HIDERCFBA

(Available via Email)

# **ATTACHMENT 5.3**

# Response to 2024 ERRA Review DR8 Q2-BRRBA

(Available via Email)

# **ATTACHMENT 5.4**

**BRRBA Closing Sheet** 

(Available via Email)

(Confidential)