

Application No.:	<u>A.25-04-001</u>
Exhibit No.:	<u>SCE-08</u>
Witnesses:	<u>C. Benitez</u>
	<u>C. La Torre</u>
	<u>L. Laven</u>
	<u>E. Molnar</u>
	<u>A. Okoro</u>



(U 338-E)

***Rebuttal Testimony  
Energy Resource Recovery Account (ERRA)  
Review of Operations, 2024***

Before the

**Public Utilities Commission of the State of California**

Rosemead, California  
January 30, 2026

**SCE-08: Rebuttal Testimony Energy Resource Recovery Account (ERRA)  
Review of Operations, 2024**

**Table of Contents**

<b>Section</b>	<b>Page</b>	<b>Witness</b>
I. INTRODUCTION .....	1	C. La Torre
II. REBUTTAL TO CAL ADVOCATES .....	3	A. Okoro
A. Cal Advocates’ Proposal For An IOU Workshop To Potentially Revise LCD Filing Rules To Adapt To The Changing Electricity Market Should Be Coordinated With All Stakeholders.....	3	
1. SCE’s Position .....	3	
2. Cal Advocates’ Position.....	3	
3. SCE’s Rebuttal.....	4	
B. Cal Advocates’ Three Recommendations Related To A Mountainview Generating Station (Mountainview) Outage Are Burdensome, Unnecessary, And Costly And Should Be Rejected.....	4	L. Laven
1. SCE’s Position .....	4	
2. Cal Advocates’ Position.....	5	
3. SCE’s Rebuttal.....	6	
a) Cal Advocates’ Recommendation To Establish A New Procedure For Advisories Is Unnecessary Because This Was An Isolated Incident And SCE Currently Maintains Robust Internal Operations And Maintenance (O&M) Procedures For Equipment Monitoring And Manufacturer Communications For Major Components.....	6	
b) Cal Advocates’ Proposal For SCE To Contact Electroschwitch Corporation And To List Advisories In SCE’s 2026 ERRA Compliance Proceeding Is Burdensome, Unwarranted, And Should Be Denied .....	9	

**SCE-08: Rebuttal Testimony Energy Resource Recovery Account (ERRA)  
Review of Operations, 2024**

**Table of Contents (continued)**

<b>Section</b>	<b>Page</b>	<b>Witness</b>
<ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li>c) Cal Advocates’ Recommendation For SCE To Repair Beckwith M-3425A Relay Is Unnecessary And Should Be Rejected .....10</li> </ul> </li> <li>C. Cal Advocates’ Proposed Disallowance For Interest Related To CARB Administrative Fees Has A Net Zero Impact On Customers And Should Be Rejected.....11</li> <li> <ul style="list-style-type: none"> <li>1. SCE’s Position .....11</li> <li>2. Cal Advocates’ Position.....11</li> <li>3. SCE’s Rebuttal.....12</li> </ul> </li> </ul> </li> <li>III. REBUTTAL TO DIMENSION ENERGY.....14</li> <li> <ul style="list-style-type: none"> <li>A. SCE Is Not Seeking Cost Recovery In This Proceeding; Therefore, Dimension Energy’s Recommendations Are Outside The Scope .....14</li> <li> <ul style="list-style-type: none"> <li>1. SCE’s Position .....14</li> <li>2. Dimension Energy’s Position .....14</li> <li>3. SCE’s Rebuttal.....15</li> </ul> </li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li></li> <li>C. Benitez</li> <li></li> <li>E. Molnar</li> </ul>

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

**I.**

**INTRODUCTION**

Southern California Edison Company (SCE) submits this rebuttal testimony in response to the prepared direct testimony of the California Public Advocates Office at the California Public Utilities Commission (Cal Advocates) and Dimension Energy, LLC (Dimension Energy) submitted in SCE's 2024 Energy Resource Recovery Account (ERRA) Review Application (Application) for Record Period 2024. Cal Advocates' and Dimension Energy's testimonies propose disallowances and makes other recommendations. The California Public Utilities Commission (Commission or CPUC) should reject Cal Advocates' and Dimension Energy's proposed disallowances and recommendations for the reasons set forth herein. SCE responds to Cal Advocates' and Dimension Energy's recommendations by subject as follows:

**Chapter II: Rebuttal to Cal Advocates**

- Chapter II.A.: SCE's response to Cal Advocates' proposal for a workshop with the investor-owned utilities (IOUs) and other interested parties to set revised Least-Cost Dispatch (LCD) filing rules that account for changes to the electricity market.<sup>1</sup>
- Chapter II.B.: SCE's response to Cal Advocates' recommendations related to a Mountainview Generating Station (Mountainview) outage.
- Chapter II.C.: SCE's response to Cal Advocates' proposed disallowance of \$91,413 for accrued interest related to California Air Resources Board (CARB) administrative costs that SCE originally recorded to the ERRA Balancing Account (BA) and New System Generation BA (NSGBA) instead of recording the costs directly to the Base Revenue Requirement BA (BRRBA).

---

<sup>1</sup> See CA-01C, p. 1-3, lines 9-11.

### **Chapter III: Rebuttal to Dimension Energy**

- Chapter III.A.: SCE's response to Dimension Energy's proposed disallowance of \$2.5 million in administrative and billing automation expenses recorded to SCE's Green Tariff Shared Renewables Administrative Costs Memorandum Account (GTSRACMA).

1 II.

2 **REBUTTAL TO CAL ADVOCATES**

3 **A. Cal Advocates' Proposal For An IOU Workshop To Potentially Revise LCD Filing Rules**  
4 **To Adapt To The Changing Electricity Market Should Be Coordinated With All**  
5 **Stakeholders**

6 **1. SCE's Position**

7 In SCE's direct testimony, supporting workpapers, and SCE's responses to Cal  
8 Advocates' data requests, SCE provided qualitative and quantitative documentation. During the Record  
9 Period, SCE consistently followed prudent procurement and bidding processes and practices to satisfy  
10 Standard of Conduct (SOC) 4.<sup>2</sup> SCE's actions met the Commission's LCD Compliance Standard and  
11 complied with the requirements established in Decision (D.)15-05-007. SCE requests the Commission  
12 find that SCE's LCD-related activities in 2024 were reasonable and in compliance with the applicable  
13 Commission standards.

14 **2. Cal Advocates' Position**

15 Cal Advocates reviewed SCE's Application and testimony and analyzed SCE's responses  
16 to the data requests in the areas related to SCE's forecast accuracy, supply bidding strategy, hydro  
17 management, and demand response management. Overall, Cal Advocates does not object to SCE's  
18 conduct, procedures, and market results of economic bidding and scheduling in the 2024 Record  
19 Period.<sup>3</sup> However, Cal Advocates recommends the Commission hold a workshop with the IOUs and  
20 other interested parties to set revised LCD filing rules that account for changes to the electricity market,  
21 since the rules were first developed in 2015, including widespread adoption of rooftop solar and  
22 expanded use of energy storage resources.<sup>4</sup>

---

2 <sup>2</sup> See SCE-03C, p. 28.

3 <sup>3</sup> See CA-01C, p. 2-25, lines 9-10.

4 <sup>4</sup> See CA-01C, p. 1-3, lines 9-13.

1           **3.     SCE’s Rebuttal**

2           SCE appreciates Cal Advocates’ observations regarding the evolving dynamics of the  
3 electricity market and the view that changes to LCD filing should be discussed. However, because Cal  
4 Advocates’ recommendation would affect all three IOUs, advancing it within SCE’s ERRR Review  
5 Application does not provide proper notice to the other IOUs or stakeholders. To provide proper notice,  
6 Cal Advocates can file a Petition for Modification (PFM) of D.15-05-007 or the Commission can open a  
7 rulemaking on the matter, in which case SCE would participate in a Commission-sponsored workshop to  
8 discuss potential updates to LCD filing rules.

9           **B.     Cal Advocates’ Three Recommendations Related To A Mountainview Generating Station**  
10           **(Mountainview) Outage Are Burdensome, Unnecessary, And Costly And Should Be**  
11           **Rejected**

12           **1.     SCE’s Position**

13           As discussed in direct testimony, on July 9, 2024, the 4B CTG 18kV Breaker tripped at  
14 full load.<sup>5</sup> The root cause of the trip was traced to a component failure within the Electros witch 86RE  
15 lockout relay; the direct operational impact was the opening of the generator output breaker. The relay  
16 failure initiated the trip, but the breaker actuation (i.e., moving from closed to open) was the proximate  
17 cause of the unit derate and outage. SCE’s prudent management of the event led to the discovery of an  
18 issue with the Electros witch relay, which was temporarily resolved by disabling the lighted faceplate.<sup>6</sup>  
19 As explained in responses to Cal Advocates’ data requests, there was an issue with older illuminated  
20 models (pre-2008) that could potentially cause unintended actuation of the lockout relay, leading to a  
21 false trip.<sup>7</sup> During the outage investigation, SCE proactively contacted the manufacturer and discovered  
22 that the Electros witch relay was under a manufacturer’s advisory regarding the lighted nameplate.<sup>8</sup> The

---

<sup>5</sup> See SCE-01, pp. 70-71.

<sup>6</sup> See SCE-01, pp. 70-71.

<sup>7</sup> See CA-02C, SCE’s Response to Cal Advocates’ Data Request #17, Questions 85 and 95.

<sup>8</sup> See CA-02C, SCE’s Response to Cal Advocates’ Data Request #17, Question 85.

1 advisory letter was issued by Electroswitch on September 19, 2014. However, SCE was not aware of the  
2 advisory until it contacted Electroswitch while investigating the 86RE relay trip event on January 11,  
3 2024. It should be noted that the manufacturer's advisory was not a mandatory compliance requirement;  
4 rather, a conditional recommendation to consider replacement if certain circumstances had been met.  
5 SCE has no record of the 86RE relay being exposed to elevated voltage or exhibiting symptoms related  
6 to the lighted nameplate and does not believe such conditions were triggered.<sup>9</sup> In fact, SCE did not  
7 experience any operational issues related to the lighted nameplate for almost 10 years from the issuance  
8 of the advisory. Prior to the outage, the relay had passed all previous testing performed during routine  
9 maintenance and was operating within normal expected parameters.<sup>10</sup> Given the parameters related to  
10 this outage, SCE's actions were prudent, reasonable, and consistent with the Reasonable Manager  
11 Standard.

## 12 **2. Cal Advocates' Position**

13 After reviewing SCE's responses to data requests, Cal Advocates asserts that SCE did not  
14 identify all relevant actions comporting to the Commission's Reasonable Manager Standard.<sup>11</sup> Cal  
15 Advocates states SCE did not mention whether it had contacted Electroswitch Corporation or other  
16 manufacturers as to whether there are outstanding advisories that it did not receive, especially in light of  
17 what had happened: there could be other urgent advisories that need paramount attention to prevent  
18 equipment failures and/or power outages.<sup>12</sup> In addition, Cal Advocates asserts that SCE did not mention  
19 whether its in-house purchasing and operational procedures should be changed/modified to require  
20 communication between SCE and all its equipment manufacturers to receive equipment advisories.<sup>13</sup>

---

<sup>9</sup> See CA-02C, SCE's Response to Cal Advocates' Data Request #17, Question 134.

<sup>10</sup> See CA-02C, SCE's Response to Cal Advocates' Data Request #17, Question 134.

<sup>11</sup> See CA-01C, p. 3-7, line 21; and p. 3-8, line 1.

<sup>12</sup> See CA-01C, p. 3-8, lines 1-5.

<sup>13</sup> See CA-01C, p. 3-8, lines 5-7.



Further, Cal Advocates contends that SCE did not mention, in describing its corrective actions, any commitment to repair the Beckwith M-3425A relay, which could not be tested due to technical issues with the testing software.<sup>14</sup> Cal Advocates asserts that, if the relay needed to be tested, it must be important for the integrity of plant operations.<sup>15</sup>

Cal Advocates recommends the Commission order SCE to:

(a) establish a procedure to ensure that it would receive equipment advisories from manufacturers for all plant equipment (not just 86RE relays) that are critical for operational readiness,

(b) contact Electroswitch Corporation, the manufacturer of the failed 86RE relay, to find out whether there had been advisories that it did not receive prior to July 11, 2024 and require SCE to report, in its next ERRR Compliance filing in 2026, the list of those outstanding advisories and SCE's actions on those advisories, and

(c) repair the Beckwith M-3425A relay, which could not be tested currently due to technical issues with the testing software.<sup>16</sup>

### **3. SCE's Rebuttal**

a) Cal Advocates' Recommendation To Establish A New Procedure For Advisories Is Unnecessary Because This Was An Isolated Incident And SCE Currently Maintains Robust Internal Operations And Maintenance (O&M) Procedures For Equipment Monitoring And Manufacturer Communications For Major Components.

The advisory was not 'urgent' but rather was a conditional recommendation that reads, "Electroswitch has received a *few isolated* reports of incidents concerning Lock Out Relays and Breaker Control Switches with 48 VDC and 125 VDC Lighted Nameplates (LNPs), Model 658, manufactured in years 2000-2008. Reported LNP symptoms have included the nameplate LEDs not lit

---

<sup>14</sup> See CA-01C, p. 3-9, lines 20-22.

<sup>15</sup> See CA-01C, p. 3-9, lines 22-23.

<sup>16</sup> See CA-01C, p. 3-1, lines 7-18.

1 or flashing, the SCADA contact alarm on or intermittent and in a *very few* reported instances, failures  
2 resulting in an unintended breaker “trip/open” operation.”<sup>17</sup> In addition, “Electroswitch suggests that  
3 customers with LNP Model 658 *consider replacement* where their nameplates may have been exposed  
4 to elevated voltage conditions or are exhibiting LNP symptoms...”<sup>18</sup> Given that SCE did not experience  
5 any operational issues related to the lighted nameplate for almost 10 years from the issuance of the  
6 advisory nor were the conditions for replacement met, SCE would not have had cause to replace the  
7 lighted nameplate, even if it had timely notification of the advisory.

8 SCE agrees that maintaining awareness of manufacturer advisories is important to  
9 safe and reliable operations. SCE routinely monitors and engages with manufacturers for major plant  
10 systems—including steam and gas turbines, generators, and their auxiliary equipment—because these  
11 systems have the greatest operational significance. Generating stations contain thousands of individual  
12 components supplied by many manufacturers, each with different roles in plant operation. In practice,  
13 SCE prioritizes its monitoring and maintenance activities based on the operational importance and  
14 engineering characteristics of the equipment, consistent with standard utility practice. Electroswitch  
15 lockout switches are common, commercially available devices that rarely actuate and have historically  
16 performed reliably. As such, they are treated in accordance with standard maintenance practices for  
17 noncritical balance of plant components, which is appropriate given their limited operational impact.

18 In addition, SCE reinforced its oversight protocols following the outage by  
19 ensuring all relay testing, wiring verification, and equipment commissioning activities are reviewed and  
20 approved by Generation Management. SCE coordinated closely with Electrical Systems Testing to  
21 validate relay logic, perform point-to-point wiring checks, and confirm proper operation before returning  
22 the unit to service. Additionally, SCE initiated a station-wide inspection and replacement program for all  
23 affected Electroswitch relays and requested that the manufacturer update its advisory distribution list to  
24 include SCE stakeholders.

---

<sup>17</sup> See CA-01C, p. 3-46 [emphasis added].

<sup>18</sup> *Id.*

1                   The isolated instance cited by Cal Advocates – the Electros witch advisory that  
2 was not received by SCE – was promptly addressed through corrective actions. SCE requested that  
3 Electros witch update its advisory distribution list to include key SCE stakeholders. However,  
4 Electros witch indicated it does not maintain any contact lists. Electros witch personnel explained it  
5 receives orders from panel shops and other intermediaries that incorporate Electros witch components  
6 into products ultimately delivered to end users such as SCE. In those cases, Electros witch provides the  
7 Advisory Notice to the company that issued the purchase order with the expectation it will be forwarded  
8 to the end user. In the case of Mountainview Generating Station, this could have been multiple entities  
9 given that SCE is not the generating station’s first owner. Electros witch indicated there is a strong  
10 likelihood it did not issue an advisory directly to SCE. The affected relay was original equipment from  
11 2005 and was installed prior to SCE’s ownership of Mountainview. As noted, SCE requested that  
12 Electros witch update its advisory distribution list to include SCE stakeholders, and SCE has updated and  
13 continues to update its contacts for all major components at Mountainview. During conversations with  
14 Electros witch, Electros witch confirmed it will review its purchasing records and send an advisory notice  
15 to all buyers of the product.

16                   SCE’s existing protocols, combined with these enhancements, ensure timely  
17 identification and resolution of equipment issues without imposing duplicative or unnecessary  
18 compliance requirements. Mandating an additional formal procedure would not materially improve  
19 system reliability but, on the other hand, would increase administrative and regulatory burden,  
20 operational complexity, and cause increased costs for customers.

21                   Moreover, a blanket requirement to contact all manufacturers for advisories,  
22 based on an isolated event, is unduly burdensome. As discussed above, the Mountainview Generating  
23 Station units are comprised of thousands of individual components such as relays, wires, bolts, and  
24 nameplates. Currently, SCE does not have the necessary resources to contact all equipment  
25 manufacturers to determine whether there are advisories that SCE has not received as SCE would have

1 to contact thousands of manufacturers. This unnecessary mandate that would divert critical resources  
2 from higher-priority reliability initiatives.

3 Further, it is not necessary to require SCE to include a ‘communication protocol’  
4 in its equipment purchase orders and/or service contracts. This was an isolated, one-time event that  
5 occurred almost a decade after the manufacturer issued a conditional recommendation advisory. On a  
6 regular basis, SCE receives Technical Information Letters (TIL) from General Electric (GE) notifying  
7 SCE of maintenance, compliance or safety-related advisories. GE is the manufacturer of the major plant  
8 systems: the steam turbine, the gas turbine, and the generator. SCE will continue to reach out to  
9 manufacturers, as needed, as SCE becomes aware of advisories. A new requirement is unwarranted and  
10 Cal Advocates’ recommendation should be rejected.

11 b) Cal Advocates’ Proposal For SCE To Contact Electroswitch Corporation And To  
12 List Advisories In SCE’s 2026 ERRR Compliance Proceeding Is Burdensome,  
13 Unwarranted, And Should Be Denied

14 SCE acknowledges the importance of manufacturer advisories and has already  
15 taken corrective actions following the isolated instance cited by Cal Advocates. However, imposing a  
16 formal requirement to provide a list of outdated advisories related to an outage that has already been  
17 resolved – and to report that list in a future ERRR Review – would create an unnecessary administrative  
18 burden and increase costs for customers without providing any meaningful reliability benefits, given that  
19 the underlying issue has already been resolved. As stated above, during conversations with  
20 Electroswitch, it was confirmed that if an advisory notice is issued in the future for any product,  
21 Electroswitch will review its purchasing records and send an advisory notice to all buyers of the product.

22 Further, SCE initiated a replacement program for all lighted nameplates for  
23 Electroswitch 86 relays of the same vintage (pre-2008) as the 86RE relay that tripped.<sup>19</sup> This proactive  
24 replacement program was implemented to mitigate future risk. The program included scheduled  
25 replacement, verification of wiring, and bypassing illumination circuits where necessary to prevent false

---

<sup>19</sup> See CA-02C, SCE’s Response to Cal Advocates’ Data Request #17, Question 120.

trips.<sup>20</sup> There is no need for SCE to request vintage advisories for a product that is no longer in use at the Mountainview Generating Station.

Mandating a universal requirement for SCE to contact all equipment manufacturers, regarding retrospective advisories for equipment that is no longer used at Mountainview, would inappropriately redirect resources away from more critical reliability initiatives. SCE asserts that its current practices are reasonable and consistent with prudent utility operations and the Commission's Reasonable Manager Standard.

Cal Advocates' recommendation that SCE contact Electroswitch Corporation to determine whether there had been advisories that SCE did not receive for equipment that is no longer used at Mountainview Generating Station and report the findings in SCE's 2026 ERRR Review Application is moot and should be rejected.

c) Cal Advocates' Recommendation For SCE To Repair Beckwith M-3425A Relay Is Unnecessary And Should Be Rejected

The Beckwith M-3425A relay serves as a backup generator protection relay, providing redundancy for fault detection and trip initiation. While technical issues with the testing software initially prevented a full test, SCE verified wiring and absence of fault indications before returning the relay to service in AUTO mode. Further, during this event, the 86RE relay was the only lockout relay that was actuated, and there were no alarm or event indications on any of the protective relays (*i.e.*, the Beckwith M-3425A relays).<sup>21</sup> As previously discussed, SCE implemented a proactive replacement program for similar relays to mitigate future risk, reflecting its commitment to safeguarding equipment reliability, minimizing operational risk, and protecting customer interests. While Cal Advocates is correct that SCE was unable to test the Beckwith M-3425A relay at the time, its failure was not the cause of the outage. The trip was caused by a component failure in the 86RE lockout relay

---

<sup>20</sup> See CA-02C, SCE's Response to Cal Advocates' Data Request #17, Question 120.

<sup>21</sup> See CA-02C, SCE's Response to Cal Advocates' Data Request #17, Question 80.

1 control circuit.<sup>22</sup> The 86RE relay was the only lockout relay that actuated during the event and no  
2 protective relay elements were triggered, and no trip signals were issued from the SEL or Beckwith  
3 relays.<sup>23</sup> As such, there is no need for SCE to “repair” the fully operational Beckwith M-3425A relay(s).  
4 Cal Advocates’ recommendation to repair the Beckwith M-3425A relay is unnecessary and should be  
5 rejected.

6 **C. Cal Advocates’ Proposed Disallowance For Interest Related To CARB Administrative Fees**  
7 **Has A Net Zero Impact On Customers And Should Be Rejected**

8 **1. SCE’s Position**

9 Assembly Bill 32 (AB 32), enacted in 2006, requires electric utilities to pay annual fees  
10 to fund the state’s administration of AB 32 programs. From 2021-2023, SCE recorded these CARB  
11 administrative fees in the ERRA BA and the NSGBA. As stated in SCE’s 2023 ERRA Forecast  
12 testimony and approved in the respective decision, SCE stated it would record the CARB administrative  
13 costs into the distribution subaccount of the Base Revenue Requirement Balancing Account (BRRBA-  
14 D).<sup>24</sup> However, SCE inadvertently omitted these costs in the BRRBA from 2021 through 2023 and,  
15 instead, recorded them in the ERRA BA and the NSGBA. In 2024, SCE corrected the accounting entries  
16 by recording a \$1.276 million debit (including interest) in the BRRBA-D to correct the inadvertent error  
17 and an off-setting credit entry in the ERRA BA and the NSGBA.

18 **2. Cal Advocates’ Position**

19 Cal Advocates recommends the Commission disallow the calculated interest of  
20 \$91,412.54 related to the CARB transactions recorded in the BRRBA. Cal Advocates believes that if  
21 SCE originally recorded the CARB administrative fee costs in the BRRBA, the interest would have only  
22 been calculated through December 31, 2021 as part of the BRRBA year-end balance and then included

---

<sup>22</sup> See CA-02C, SCE’s Response to Cal Advocates’ Data Request #17, Question 95.

<sup>23</sup> See CA-02C, SCE’s response to Cal Advocates’ Data Request #17, Question 129.

<sup>24</sup> See D.20-12-035, D.22-01-003, D.22-12-012.

1 in rates the following year (i.e., 2022).<sup>25</sup> Therefore, “Cal Advocates recommends a disallowance of  
2 \$91,412.54, the calculated interest from the inadvertently recorded CARB administrative costs in the  
3 ERRA BA and the NSGBA, from the BRRBA.”<sup>26</sup>.

### 4 **3. SCE’s Rebuttal**

5 SCE should not be disallowed from collecting the accrued interest that would have still  
6 been collected from customers even if the costs were originally recorded in the BRRBA-D. As it relates  
7 to the interest calculation, it is inconsequential whether the costs were recorded in the ERRA BA, the  
8 NSGBA, or the BRRBA because the interest recorded in all three of these accounts is calculated by  
9 using the same interest rate. Importantly, as discussed below, SCE’s correcting entries resulted in a net  
10 \$0 impact to customers.

11 SCE has a consistent approach for determining and applying the interest rate calculation  
12 for all accounts that are subject to interest. As stated in Preliminary Statement Part YY – BRRBA,  
13 Preliminary Statement Part ZZ – ERRA BA, and Preliminary Statement Part RR – NSGBA, the interest  
14 rate shall be one-twelfth of the Federal Reserve three-month Commercial Paper Rate – Non-Financial,  
15 from the Federal Reserve Statistical Release H.15. The interest rate used for the calculation is consistent  
16 – exactly the same – among the three balancing accounts, and entries recorded into each of these  
17 accounts continue to accrue interest, even after a transfer is made into that account. In addition, all three  
18 accounts are incorporated in SCE’s year-end consolidated revenue requirement and rate change advice  
19 letter at the beginning of the following year to recover the prior year’s balance from customers. Cal  
20 Advocates’ suggestion that any portion of the interest should be excluded is unfounded.

21 In its testimony,<sup>27</sup> Cal Advocates implies that if SCE would have recorded the 2021  
22 CARB administrative costs in November 2021 in the BRRBA-D, rather than the ERRA BA, interest  
23 would have only been calculated through December 31, 2021 as part of the BRRBA year-end balance,

---

<sup>25</sup> See CA-01C, p. 5-9, lines 10-14.

<sup>26</sup> See CA-01C, p. 5-11, lines 7-9.

<sup>27</sup> See CA-01C, p. 5-9, lines 10-14.

then collected in rates the following year, and no additional interest would have accrued beyond December 31, 2021. As stated above, regardless of whether costs are recorded in the BRRBA, the ERRA BA, and/or the NSGBA, all three accounts use the same interest rate as part of the interest calculation. Once a transfer is made between accounts, the transfer amount continues to accrue interest at the same rate and does not stop accruing interest after the transfer is initiated. Further, all three accounts are typically included in SCE's January 1 rate change; therefore, it is incorrect that interest would somehow be different if the costs were originally recorded in the BRRBA.

The correcting entries that transferred the CARB administration fees from the ERRA BA and the NSGBA to the BRRBA-D have a net zero impact on customers. SCE debited the BRRBA to correct and record the CARB fees and made corresponding credit entries in both the ERRA BA and the NSGBA. As shown in Table II-1 below, the net true-ups for the CARB administrative fees across the accounts total zero.

***Table II-1  
Summary of Accounting Adjustments  
Recorded in September 2024***

	<b>Reg. Acct.</b>	<b>Principle</b>	<b>Interest</b>	<b>Total</b>
<b>BRRBA</b>	1412110	1,176,638	99,352	1,275,990
<b>ERRA</b>	2412010	(349,505)	(37,820)	(387,325)
<b>NSGBA</b>	1412690	(827,133)	(61,532)	(888,665)
<b>Total</b>		0	(0)	(0)

The net impact to customers is \$0 given that (1) SCE accrues interest at the same rate in all three accounts, (2) all three accounts are implemented in rates each year (typically at the same time on January 1), and (3) SCE recorded a debit entry in the BRRBA and off-setting credit entries in the ERRA BA and the NSGBA, resulting in a net \$0 impact to customers. For these reasons, Cal Advocates' recommendation should be rejected.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

III.

**REBUTTAL TO DIMENSION ENERGY**

**A. SCE Is Not Seeking Cost Recovery In This Proceeding; Therefore, Dimension Energy's Recommendations Are Outside The Scope**

**1. SCE's Position**

As discussed in SCE's Application and testimony as well as in SCE's responses to Dimension Energy's data requests related to SCE's Green Tariff Shared Renewables (GTSR) Administrative Costs Memorandum Account (GTSRACMA), SCE is simply "request[ing] the Commission to find that the entries in the GTSRACMA were properly recorded and consistent with applicable Commission decisions."<sup>28</sup> SCE is not seeking reasonableness review of the expenses or recovery of the costs recorded in the GTSRACMA, including billing automation costs, in this proceeding. As explained in SCE's testimony, the GTSRACMA records the difference between revenues collected through the GTSR Administrative Charge and the incremental administrative costs incurred to implement the Commission-approved GTSR program, as outlined in D.15-01-051. During the 2024 Record Year, SCE recorded \$1.985 million in administrative costs, including Green-e certification fees, billing automation, program administration, and other related activities, which SCE affirms were necessary for the program's implementation and operation. However, SCE is not requesting cost recovery of these expenses in this proceeding. Rather, SCE requests a Commission finding that the recorded entries in the GTSRACMA "are appropriate, correctly stated, and in compliance with Commission decisions."<sup>29</sup>

**2. Dimension Energy's Position**

Dimension Energy stated the purpose of its testimony "is to evaluate the reasonableness of SCE's administrative and billing automation costs associated with the GTSR program, with particular

---

<sup>28</sup> See SCE-02C, p. 98, lines 11-12.

<sup>29</sup> See SCE-02C, p. 97, lines 13-14.

1 focus on the Enhanced Community Renewables (GTSR-ECR) component.”<sup>30</sup> According to Dimension  
2 Energy, its testimony “examines SCE’s reported expenditures and proposed cost recovery mechanisms  
3 for these programs, compares SCE’s administrative and billing costs to those of comparable community  
4 solar programs operated by other utilities, and assesses whether the level of spending and the chosen  
5 recovery structure are reasonable and aligned with Commission policy and legislative intent.”<sup>31</sup>

6           Dimension Energy acknowledges that the Commission has raised cost recovery in the  
7 community renewables consolidated applications (A.22-05-022 *et al.*) but states that the reasonableness  
8 of GTSR costs for recovery in rates should be included in SCE’s ERRA Review proceeding.

9           Dimension Energy proposes the Commission disallow recovery of SCE’s GTSR billing  
10 automation and administrative expenses, totaling \$2.5 million, or alternatively to consider cost recovery  
11 over longer periods of time or through broader, equity-based mechanisms.<sup>32</sup>

### 12           **3. SCE’s Rebuttal**

13           Dimension Energy’s proposed recommendations are outside the scope of this proceeding.  
14 SCE did not, in this proceeding, request recovery of any GTSR costs or put forth an affirmative  
15 reasonableness showing for cost recovery of the incremental administrative and billing automation costs  
16 recorded in the GTSRACMA because the Commission in Resolution E-5028 rejected SCE’s request to  
17 seek GTSR incremental cost recovery in the ERRA Review. And yet, almost the entirety of Dimension  
18 Energy’s testimony is focused on the reasonableness of these costs for recovery in rates.

19           Dimension Energy’s proposed disallowance is premature, improper, and is not relevant to  
20 the issues before the Commission in this proceeding. SCE objected to numerous data requests served by  
21 Dimension Energy on the grounds that they sought information that is outside the scope of this  
22 proceeding, not relevant to the subject matter of this proceeding, nor reasonably calculated to lead to the  
23 discovery of admissible evidence. However, without waiving its objection, SCE provided responses to

---

<sup>30</sup> See Dimension-01, p. 4, lines 9-12.

<sup>31</sup> See Dimension-01, p. 4, lines 12-17.

<sup>32</sup> See Dimension-01, p. 4-5, lines 22-23 and line 1.

1 each question. And as explained in response to Dimension Energy’s data request, “SCE is not seeking to  
2 recover ECR billing automation costs in this proceeding. Rather, SCE is requesting a Commission  
3 finding that the entries recorded in the GTSR Administrative Costs Memorandum Account  
4 (GTSRACMA) were properly recorded and consistent with applicable Commission decisions. On March  
5 15, 2023, SCE first discussed how Green Tariff Shared Renewables (GTSR) costs should be recovered  
6 in its Amended Supplemental Testimony of the Green Access Program (GAP) proceeding (A.22-05-022  
7 *et al.*) As the GAP proceeding remains open, SCE has been proactive in sharing potential cost recovery  
8 proposals and reiterating its request for Commission guidance on this matter, including in its July 10,  
9 2024 response to a June 5, 2024 Administrative Law Judge’s Ruling as well as an April 28, 2025  
10 response to an April 1, 2025 Administrative Law Judge’s Ruling. The Commission has not yet ruled on  
11 a recovery mechanism for the costs recorded in the GTSRACMA. Thus, details of SCE’s plans for  
12 recovering billing automation costs are premature, absent a Commission decision on a GTSR cost  
13 recovery mechanism.”<sup>33</sup>

14 On January 12, 2026, SCE held a meet-and-confer with Dimension Energy to address  
15 their testimony, informing them that the issues they raise fall outside the scope of this proceeding  
16 because the Commission has not yet identified a proper venue in which to consider a request by SCE to  
17 recover its incremental GTSR costs. During the meet-and-confer, SCE requested Dimension Energy  
18 withdraw its testimony; however, Dimension Energy declined to do so.

19 As such, on January 28, 2026, SCE filed a *Motion to Strike Portions of the Direct*  
20 *Testimony of Robert Brandon Smithwood on Behalf of Dimension Energy LLC* on grounds that it  
21 exceeds the scope of this application because SCE is not entitled to seek, and therefore is not seeking,  
22 recovery of any GTSR costs in this application.

23 Dimension Energy’s recommendations are outside the scope of this proceeding and its  
24 testimony regarding proposed disallowances and alternatives should be disregarded and stricken from  
25 the record.

---

<sup>33</sup> See Dimension-01, Exhibit 3, SCE’s Response to Data Request: Dimension-SCE-002, Question 7.a-c.