CPUC Docket: A.26-01-003 et al.
Exhibit Number: TURN-08
Date: November 25, 2026

A.26-01-003 et al.

Ex. TURN-08

SCE responses to TURN DR 10, Questions 2 and 4-8

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 1 0

To: TURN
Prepared by: Eugene Ayuyao
Job Title: Senior Advisor
Received Date: 10/30/2026

Response Date: 11/16/2026

Question 02:
SCE rebuttal testimony at p. 49, lines 12-13 states that "the 35 percent input is based on SCE's historical verification experience because direct implementation data are unavailable." Please show all steps in SCE's calculation of the 35 percent figure, including data inputs and an explanation of assumptions.

Response to Question 02:

The 35 percent reduction in forecasted CARE new enrollments consists of (1) a 26 percent historical verification factor and (2) a 9 percentage-point forecast adjustment for additional anticipated attrition not reflected in those historical results. As explained in SCE's response to CalAdv-SCE-006-KH, Question 1, SCE used 2024 and annualized 2025 CARE Traditional Post-Enrollment Verification (PEV) and High Usage Verification (HUV) results as a directional proxy because SCE does not have direct implementation experience with full upfront eligibility verification.[1]

The calculation is as follows:

1. SCE combined 30,396 PEV/HUV verification requests from 2024 and annualized 2025.
2. Of these, 7,627 did not respond and 114 failed verification, for a total of 7,741 non-responses and failures.
3. 7,741 ÷ 30,396 = approximately 25.5 percent, which SCE rounded to 26 percent for forecasting purposes.
4. SCE then added a 9-percentage point forecasting adjustment to account for anticipated enrollment attrition not captured by the historical PEV/HUV results, including customer move-outs, account closures, and other circumstances that may prevent enrollment completion.[2]
5. The 26 percent plus 9 percentage points equals to 35 percent forecasted reduction in new CARE enrollments.

---

[1] SCE Response to CalAdv-SCE-006-KH, Question 1, reproduced in Exhibit SCE-10 Appendix B pp. B1-B2; see also SCE Response to CalAdv-SCE-004-KH, Question 6, Attachment CalAdv-SCE-004-KH_CARE Subsidy_Q6.xlsx.
[2] Ibid.

Accordingly, the total 35 percent represents a forecasting assumption regarding enrollment completion under the proposed upfront eligibility process. It does not represent an estimate that 35 percent of CARE customers are income-ineligible or that 35 percent of otherwise eligible customers will be denied benefits.[3] SCE has consistently applied this forecasting assumption in subsequent discovery, including TURN-SCE-005, Question 21[4] and its supporting enrollment workpaper, and incorporated anticipated upfront eligibility attrition into the CARE participation forecast discussed in TURN-SCE-006, Question 9. [5]

[3] Exhibit SCE-10, p 49.
[4] SCE Response to TURN-SCE-005, Question 21.
[5] SCE Response to TURN-SCE-006, Question 9.

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 1 0

To: TURN
Prepared by: Adam Manke
Job Title: Cust Engy Prgms, Sr Advisor
Received Date: 10/30/2026

Response Date: 11/16/2026

Question 04:
SCE's rebuttal testimony at p. 56 discusses the Base Services Charge (BSC). Please provide SCE's Q3 2026 BSC quarterly implementation metrics, as provided to the Demand Flexibility service list on 10/30/2026.

Response to Question 04:
Please see the attached Excel file, "TURN-SCE-010_Q04_Attachment.xlsx," which provides SCE's Q3 2026 BSC Quarterly Implementation Metrics as provided to the Demand Flexibility Service List.

Southern California Edison
TURN-SCE-010, Question 4

Metric		Q1 2024	Q2 2024	Q3 2024	Q4 2024	Q1 2025	Q2 2025	Q3 2025	Q4 2025	Q1 2026	Q2 2026	Q3 2026[4]
(h)	**ME&O dollars spent**											
h.1	Research	$ -	$ -	$ -	$144,067	$17,363	$7,340	$13,960	$8,665	$0	$11,345	$0
h.2	Web	$ -	$ -	$ -	$125,517	$0	$56,364	$10,386	$4,444	$0	$0	$0
h.3	Collateral	$ -	$ -	$ -	$24,903	$0	$34,804	$2,373	$0	$0	$0	$0
h.4	CBOs	$ -	$ -	$ -	$0	$0	$0	$0	$123,322	($14,837)	$3,893	$37,281
h.5	Paid Media	$ -	$ -	$ -	$5,870	$264,479	$18,412	($248,422)	$327,532	$152,312	$4,589	$6,786
h.6	Bill Messaging	$ -	$ -	$ -	$0	$0	$3,891	$4,213	$69,064	$0	$0	$0
h.7	Direct Communications[1]	$ -	$ -	$ -	$500,725	$0	$28,966	$651,682	$494,156	($548,972)	$25,322	$26,577
h.8	Integrated Communications	$ -	$ -	$ -	$0	$0	$0	$0	$13,965	($35)	$0	$0
h.9	Agency Support[2]	$ -	$ -	$ -	$173,520	$75	$89,283	$104,334	$47,647	$7,335	$14,704	$5,132
h.10	Internal Labor[3]	$ -	$ -	$ -	$0	$0	$66,785	$56,780	$51,395	$0	$74,170	$29,160

Footnotes

[1] In Q4 2025, metrics were updated to include postage costs. This line item contains the posting and reversal of a $0.5M 2024 memo account posting in Q1 2026. Q2-Q3 2026 metrics include DRAH attestation communications costs.

[2] Beginning in Q1 2026, metrics include procurement charges for Q1 2026 and all future reporting periods. The Q1 2026 update also includes previously unreported procurement charges for all prior quarters.

[3] In Q1 2026, labor costs that did not meet the incrementality test were removed from the reported totals for all quarters.

[4] Paid Media, Direct Communications, and Internal Labor (Contingent Worker) do not include all Q3 2026 expenses, as invoices are typically billed two months after work completion. All quarters have been updated to reflect memo account posting dates.

Note: Negative values are the result of accrual reversals.

Southern California Edison
TURN-SCE-010, Question 4

	Metric	Q2 2025 Apr	May	June	Q3 2025 July	Aug	Sep	Q4 2025 Oct	Nov	Dec	Q1 2026 Jan	Feb	Mar	Q2 2026 Apr	May	June	Q3 2026 July	Aug	Sep
(Res1)[1]	**Number of visits to dedicated website[2]**	278	1,035	5,571	16,942	30,612	26,650	46,107	41,038	48,412	11,709	6,197	7,011	5,740	5,435	5,809	6,940	7,334	6,032
(d)	**Number of press article mentions**	0	0	0	0	3	0	1	0	0	0	0	0	0	0	0	0	0	0
(e)	**Impressions and reach of paid media[3]**			5,413	148,232	195,202	273,851	267,635	216,049	171,574		2,236,273	6,550,095	7,687,603	9,153,188	4,707,229			
(f)	**Number and type of outbound targeted communications and bill messages**																		
	Direct Mail - Sent[4]																		
f.1	Tier1 CARE				3,752	73,004	305,845												
f.2	Tier2 FERA				54	930	3,402												
f.3	Tier2 DRAH[7]				6,823	55	3,924									323			
f.4	Tier3				192,547	320,094	194,440												
f.5	All Tiers																		
f.5.1	Multi accounts				221,944	0	0												
f.5.2	Master meter				608	0	0												
	Email Communications[4]																		
f.1	Tier1 CARE - Sent				6,427	202,550	659,985												
f.1.1[1]	Tier1 CARE - Open rate				67%	71%	71%												
f.1.2[1]	Tier1 CARE - Click-through rate				2%	3%	2%												
f.2	Tier2 FERA - Sent				169	7,567	18,767												
f.2.1[1]	Tier2 FERA - Open rate				72%	75%	74%												
f.2.2[1]	Tier2 FERA - Click-through rate				2%	3%	3%												
f.3	Tier2 DRAH - Sent[7]				7,346	137	6,677									317			
f.3.1[1]	Tier2 DRAH - Open rate[7]				59%	63%	65%									66%			
f.3.2[1]	Tier2 DRAH - Click-through rate[7]				9%	9%	3%									22%			
f.4	Tier3 - Sent				456,019	1,350,154	375,775												
f.4.1[1]	Tier3 - Open rate				70%	75%	75%												
f.4.2[1]	Tier3 - Click-through rate				2%	3%	3%												
f.5	All Tiers[5]																		
f.5.1	Multi accounts - Sent																		
f.5.1.1[1]	Multi accounts - Open rates																		
f.5.1.2[1]	Multi accounts - Click-through rates																		
f.5.2	Master meter - Sent																		
f.5.2.1[1]	Master meter - Open rates																		
f.5.2.2[1]	Master meter - Click-through rates																		
	Bill Message																		
f.6.1	On Bill Message							4,632,471	4,634,789	4,633,895									
f.6.2	Bill Insert[6]						161,820	1,431,804											
f.6.3	Bill Onsert																		
f.6.4	Envelope[6]						161,820	1,431,804											

Color Coding
Footnotes

Gray shading: N/A; No metrics available for this period.

[1] Number of visits to dedicated website and Email Open & Click-through rate metrics added in Resolution.

[2] BSC webpage launched 4/21/25.

[3] BSC paid search launched 6/23/25. BSC electrification webpage launched 1/16/26. BSC electrification paid media campaign launched 2/18/26 and concluded on 6/30/26. Quarterly 2026 metrics include only the BSC electrification campaign:
Q1 2026: Impressions – 6,724,251; Reach – 2,062,117; BSC electrification webpage visits – 80,517.
Q2 2026: Impressions – 15,125,687; Reach – 6,422,333; BSC electrification webpage visits – 233,747.
BSC electrification campaign concluded in Q2 2026.

[4] Direct mail and email communications deployed 7/15/25-9/18/25.

[5] SCE did not send emails to multi or master metered accounts.

[6] Bill insert/envelope deployment dates and quantities have been updated to 9/29/25-10/27/25, which differs from what was reported in the Q3 2025 report.

[7] In June 2026, DRAH attestation communications were sent by direct mail and email to CARE/FERA customers who had not received the original communication. These metrics were not included in the Q2 2026 report.

Southern California Edison
TURN-SCE-010, Question 4



Average Customer Bill Impacts

	Metric		Q4 2025	Q4 2025[1]	Q1 2026[3]	Q1 2026	Q2 2026[2]	Q2 2026	Q3 2026	Q3 2026	
	Rates Effective		Oct 1 2025								
	Implied Volumetric Rate Reductions		**Avg kWh Use**	**$/kWh**	**Avg kWh Use**	**$/kWh**	**Avg kWh Use**	**$/kWh**	**Avg kWh Use**	**$/kWh**	
	NonCARE Residential Average Rate - With BSC			0.36		0.35		0.35		0.35	Non-CARE
	NonCARE Residential Average Rate - Without BSC (Estimated)			0.41		0.39		0.39		0.40	Non-CARE
	NonCARE Residential Average Rate - Volumetric Rate Reduction (Implied)		Res Avg kWh	-0.05		-0.05	-	-0.05		-0.05	Non-CARE
	Estimated Monthly Bill Impact	**Customers**	**Avg kWh Use**	**Mo $ Chg**	**Avg kWh Use**	**Mo $ Chg**	**Avg kWh Use**	**Mo $ Chg**	**Avg kWh Use**	**Mo $ Chg**	
c.1	**Tier1 CARE**	1,348,445			426	$ (4.04)	420	$ (3.86)	768	$ (11.86)	Res avg usa
	Zone 5	54	568	$ (6.92)	697	$ (9.80)	496	$ (5.49)	497	$ (5.90)	
	Zone 6	152,328	362	$ (2.45)	365	$ (2.74)	325	$ (1.85)	446	$ (4.78)	
	Zone 8	318,906	396	$ (3.18)	383	$ (3.12)	364	$ (2.66)	588	$ (7.91)	
	Zone 9	271,092	448	$ (4.32)	430	$ (4.13)	421	$ (3.88)	749	$ (11.44)	
	Zone 10	332,881	510	$ (5.65)	457	$ (4.70)	471	$ (4.94)	963	$ (16.16)	
	Zone 13	81,409	491	$ (5.24)	444	$ (4.42)	486	$ (5.27)	937	$ (15.59)	
	Zone 14	140,122	486	$ (5.15)	496	$ (5.53)	442	$ (4.33)	911	$ (15.02)	
	Zone 15	34,235	538	$ (6.26)	379	$ (3.05)	614	$ (7.98)	1,261	$ (22.70)	
	Zone 16	17,417	492	$ (5.28)	553	$ (6.74)	428	$ (4.04)	603	$ (8.24)	
c.2	**Tier2 FERA**	49,499			440	$ (5.24)	421	$ (4.40)	786	$ (18.65)	
	Zone 5	<15	542	$ (9.56)	570	$ (10.05)					
	Blended Zone 5 and Zone 6	5,541	419	$ (4.83)	401	$ (3.79)	354	$ (1.93)	486	$ (7.26)	
	Zone 8	12,877	434	$ (5.39)	404	$ (3.90)	381	$ (2.93)	624	$ (12.49)	
	Zone 9	10,169	494	$ (7.72)	457	$ (5.85)	441	$ (5.14)	797	$ (19.06)	
	Zone 10	12,892	535	$ (9.29)	465	$ (6.16)	455	$ (5.66)	975	$ (25.78)	
	Zone 13	2,133	526	$ (8.93)	451	$ (5.64)	466	$ (6.07)	960	$ (25.21)	
	Zone 14	4,132	482	$ (7.26)	470	$ (6.34)	408	$ (3.94)	920	$ (23.71)	
	Zone 15	1,042	534	$ (9.23)	359	$ (2.26)	576	$ (10.15)	1,256	$ (36.42)	
	Zone 16	713	542	$ (9.53)	585	$ (10.59)	465	$ (6.06)	676	$ (14.45)	
c.3	**Tier2 DRAH**	12,787			192	$ 2.36	198	$ 2.24	339	$ (4.54)	
	Zone 5	N/A									
	Zone 6	3,011	189	$ 2.40	186	$ 2.62	169	$ 3.50	237	$ 0.17	
	Zone 8	3,286	210	$ 1.42	199	$ 2.05	190	$ 2.57	299	$ (2.69)	
	Zone 9	1,811	184	$ 2.61	175	$ 3.13	177	$ 3.17	293	$ (2.41)	
	Zone 10	2,206	207	$ 1.55	182	$ 2.83	172	$ 3.37	357	$ (5.33)	
	Zone 13	545	299	$ (2.77)	240	$ 0.22	310	$ (2.82)	474	$ (10.74)	
	Zone 14	1,103	265	$ (1.15)	243	$ 0.06	276	$ (1.30)	478	$ (10.92)	
	Zone 15	732	257	$ (0.77)	153	$ 4.13	277	$ (1.36)	693	$ (20.87)	
	Zone 16	95	124	$ 5.43	167	$ 3.51	162	$ 3.84	330	$ (4.11)	
c.4	**Tier3**	3,269,058			400	$ 4.87	360	$ 6.92	693	$ (8.84)	
	Zone 5	598	535	$ (1.62)	599	$ (4.08)	472	$ 1.90	530	$ (1.34)	
	Zone 6	716,861	404	$ 4.53	401	$ 4.83	348	$ 7.48	504	$ (0.14)	
	Zone 8	766,669	406	$ 4.44	385	$ 5.57	353	$ 7.23	627	$ (5.82)	
	Zone 9	664,497	461	$ 1.87	441	$ 3.01	403	$ 5.00	767	$ (12.30)	
	Zone 10	643,172	429	$ 3.34	384	$ 5.58	345	$ 7.60	829	$ (15.16)	
	Zone 13	96,455	426	$ 3.49	376	$ 5.96	346	$ 7.57	809	$ (14.24)	
	Zone 14	193,534	355	$ 6.82	362	$ 6.58	272	$ 10.89	731	$ (10.60)	
	Zone 15	104,968	466	$ 1.62	385	$ 5.56	522	$ (0.37)	1,132	$ (29.14)	
	Zone 16	82,304	391	$ 5.11	470	$ 1.73	327	$ 8.40	477	$ 1.13	

Changes QtoQ

	Metric			Q4 2025[1]	Q1 2026	Q1 2026	Q2 2026[2]	Q2 2026	Q3 2026	Q3 2026
	Rates Effective									
	Implied Volumetric Rate Reductions			**$/kWh**		**$/kWh**		**$/kWh**		**$/kWh**
	NonCARE Residential Average Rate - With BSC					(0.01)				
	NonCARE Residential Average Rate - Without BSC (Estimated)					(0.01)				
	NonCARE Residential Average Rate - Volumetric Rate Reduction (Implied)					0.00				
	Estimated Monthly Bill Impact	**Customers**		**Mo $ Chg**	**Usage Chg (kWh)**	**Mo $ Chg**	**Usage Chg (kWh)**	**Mo $ Chg**	**Usage Chg (kWh)**	**Mo $ Chg**
c.1	**Tier1 CARE**	1,348,445					(6)	$ 0.19	348	$ (8.00)
	Zone 5	54			129	$ (2.88)	(200)	$ 4.31	0	$ (0.41)
	Zone 6	152,328			3	$ (0.29)	(40)	$ 0.90	121	$ (2.94)
	Zone 8	318,906			(13)	$ 0.06	(19)	$ 0.46	225	$ (5.25)
	Zone 9	271,092			(18)	$ 0.19	(9)	$ 0.25	328	$ (7.57)
	Zone 10	332,881			(53)	$ 0.95	14	$ (0.23)	492	$ (11.22)
	Zone 13	81,409			(47)	$ 0.81	42	$ (0.84)	451	$ (10.32)
	Zone 14	140,122			10	$ (0.38)	(54)	$ 1.20	469	$ (10.69)
	Zone 15	34,235			(159)	$ 3.22	235	$ (4.93)	647	$ (14.72)
	Zone 16	17,417			61	$ (1.47)	(125)	$ 2.70	175	$ (4.20)
c.2	**Tier2 FERA**	-					(19)	$ 0.84	366	$ (14.25)
	Zone 5	<15			28	$ (0.49)	-	$ -	-	$ -
	Blended Zone 5 and Zone 6	5,539			(18)	$ 1.04	(47)	$ 1.86	132	$ (5.32)
	Zone 8	12,877			(30)	$ 1.49	(23)	$ 0.97	243	$ (9.56)
	Zone 9	10,169			(38)	$ 1.86	(16)	$ 0.72	357	$ (13.92)
	Zone 10	12,892			(70)	$ 3.12	(10)	$ 0.51	520	$ (20.12)
	Zone 13	2,133			(75)	$ 3.29	15	$ (0.44)	494	$ (19.14)
	Zone 14	4,132			(13)	$ 0.92	(62)	$ 2.40	512	$ (19.77)
	Zone 15	1,042			(174)	$ 6.97	217	$ (7.90)	679	$ (26.27)
	Zone 16	713			43	$ (1.05)	(119)	$ 4.53	210	$ (8.39)
c.3	**Tier2 DRAH**	20,347					6	$ (0.13)	142	$ (6.78)
	Zone 5	-			-	-	-	-	-	-
	Zone 6	4,752			(3)	$ 0.22	(17)	$ 0.88	68	$ (3.33)
	Zone 8	5,219			(11)	$ 0.63	(9)	$ 0.52	109	$ (5.27)
	Zone 9	3,425			(9)	$ 0.52	2	$ 0.04	117	$ (5.58)
	Zone 10	2,960			(25)	$ 1.28	(9)	$ 0.53	184	$ (8.70)
	Zone 13	963			(60)	$ 2.99	70	$ (3.03)	164	$ (7.92)
	Zone 14	1,892			(22)	$ 1.21	33	$ (1.36)	202	$ (9.62)
	Zone 15	998			(104)	$ 4.90	125	$ (5.49)	416	$ (19.51)
	Zone 16	133			43	$ (1.92)	(5)	$ 0.33	168	$ (7.96)
c.4	**Tier3**	3,261,498					(40)	$ 2.04	332	$ (15.76)
	Zone 5	593			64	$ (2.46)	(127)	$ 5.98	59	$ (3.24)
	Zone 6	715,120			(3)	$ 0.30	(53)	$ 2.65	156	$ (7.62)
	Zone 8	764,735			(21)	$ 1.13	(31)	$ 1.67	274	$ (13.06)
	Zone 9	662,883			(19)	$ 1.15	(38)	$ 1.99	365	$ (17.30)
	Zone 10	642,418			(45)	$ 2.24	(39)	$ 2.01	484	$ (22.76)
	Zone 13	96,037			(50)	$ 2.47	(30)	$ 1.61	464	$ (21.81)
	Zone 14	192,745			7	$ (0.24)	(90)	$ 4.31	459	$ (21.49)
	Zone 15	104,702			(81)	$ 3.94	137	$ (5.93)	610	$ (28.77)
	Zone 16	82,265			79	$ (3.38)	(142)	$ 6.67	149	$ (7.26)

Bill impacts are illustrative in nature and leverage average consumption by quarter - Individual customer bills may differ materially and vary based on a variety of factors including individual usage and pricing plan. Data represents a

Color Coding ***Gray shading: N/A; No metrics available for this period.***

Footnotes

[1] Bill impact comparisons will be provided one quarter after BSC implementation.

[2] A simplifying assumption was used to utilize Q1 2026 rate levels as customers experienced "January 1" rates for April and May, and June rate levels decreased slightly by 2%. Thus, both Q1 and Q2 revenue requirements are assumed to be the same.

[3] Customer count data as of Q2 2026 from billing system.

Southern California Edison
TURN-SCE-010, Question 4

	Metric	Q4 2024	Q1 2025	Q2 2025	Q3 2025[3]	Q4 2025[1]	Q1 2026	Q2 2026	Q3 2026
(a)	**Number of customers in each tier**								
a.1	Tier1 CARE					1,364,107	1,379,649	1,373,720	1,330,516
a.2	Tier2 FERA					45,641	49,392	52,062	55,651
a.3	Tier2 DRAH[7]					20,347	20,196	20,691	21,550
a.4	Tier3					3,247,370	3,293,424	3,261,154	3,374,604
(b)	**Number of customers who change tiers**								
b.1	Changed to Tier1 (New enrollments in CARE)[5]					64,783	62,771	64,368	90,786
b.2	Changed to Tier2 (New Enrollments in FERA)[5]					6,900	4,819	4,027	6,864
b.3	Changed to Tier2 (New Enrollments in DRAH)					153	184	141	198
b.4	Changed to Tier3 (Unenrollment in CARE/FERA/DRAH)					17,021	55,877	87,427	123,363
(g)	**Number of related calls OR emails received[2]**								
g.1	Number of related calls			0	2,789	3,097	17,445	15,722	11,218
g.2	Number of emails received[4]								
(i)	**Number of customers who were asked to verify their incomes through the CARE and FERA programs[6]**								
i.1	CARE					7,469	10,739	11,412	12,882
i.2	FERA					284	524	705	726
(j)	**Number of customers who successfully verified their incomes through the CARE and FERA programs**								
j.1	CARE					3,959	6,360	5,157	4,718
j.2	FERA					114	190	205	180

Color Coding ***Gray shading: N/A; No metrics available for this period.***

Footnotes

[1] Most Operational data will be provided starting in Q4 2025.
[2] Based on the IOU's discretion either calls **OR** emails will be reported.
[3] A total of 11,124 calls were received through the direct BSC phone number but were not all BSC related.
[4] There is no email channel for customer service.
[5] This is representative of new enrollments and does not account for attrition.
[6] Number of customer verifications that were sent during quarter to verify incomes or provide proof of categorical program eligibility.
[7] DRAH numbers reflect a correction made.

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 1 0

To: TURN
Prepared by: Eugene Ayuyao
Job Title: Senior Advisor
Received Date: 10/30/2026

Response Date: 11/16/2026

Question 05:
SCE's rebuttal testimony at p. 57, lines 7-8 states that "The 30 percent goal is not a ceiling" for FERA enrollment. Does SCE consider its 92% year-end goal for CARE (rebuttal testimony p. B13) to be a ceiling for CARE enrollment? Please explain why or why not.

Response to Question 05:

No. SCE does not consider the 92 percent year-end CARE enrollment goal to be a ceiling. The 92 percent represents an enrollment performance goal, not a maximum number or percentage of eligible customers that SCE will enroll. SCE would continue enrolling customers who establish CARE eligibility even if CARE participation meets or exceeds the 92 percent goal.

The distinction between a goal and a ceiling is important. SCE uses program enrollment goals to establish a measurable performance objective for its enrollment, outreach, customer assistance, and retention activities. Reaching the goal does not cause SCE to stop accepting CARE applications, decline otherwise eligible customers, or reduce outreach solely because the target has been achieved.

The 2026 CARE/FERA Marketing Plan included in Exhibit SCE-10 Appendix B identifies a 92 percent CARE year-end goal, while showing an enrollment rate above 100 percent at the time.[1] This demonstrates that the 92 percent figure functions as a program-performance benchmark rather than an enrollment cap. At the same time, SCE's objective is not simply to maximize the numerical enrollment rate. SCE seeks to maximize enrollment of customers who satisfy applicable CARE eligibility requirements while maintaining accurate eligibility determinations and responsible administration of ratepayer-funded benefits.

[1] SCE Response to CforAT-SCE-001, Question 4 (2026 Marketing Plan), reproduced in Exhibit SCE-10 Appendix B p. B13.

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 1 0

To: TURN
Prepared by: Eugene Ayuyao
Job Title: Senior Advisor
Received Date: 10/30/2026

Response Date: 11/16/2026

Question 06:
SCE's rebuttal testimony at p. 57, lines 21-22 states that for the Commission's consideration of a standalone FERA application form, "The relevant question is whether the proposal addresses a documented program problem."

a. What documented program problem does SCE believe a standalone FERA application form will address?
b. Does SCE contend that a standalone FERA application form will increase FERA enrollment relative to the counterfactual of a combined CARE/FERA form? Please explain why or why not.
c. In SCE's view, is it possible that a standalone FERA enrollment form may decrease FERA enrollment? Please explain why or why not.
d. How would SCE evaluate whether a standalone FERA application form has increased or decreased FERA enrollment relative to the counterfactual of a combined CARE/FERA form?

Response to Question 06:

a. What documented program problem does SCE believe a standalone FERA application form will address?

The documented program problem is persistent FERA under-enrollment associated with barriers to identifying, reaching, and enrolling eligible customers. These barriers include limited program awareness, FERA's narrow income band, difficulty self-assessing eligibility, and confusion between CARE and FERA enrollment pathways. Despite extensive outreach, FERA participation has remained substantially below Commission-established targets. SCE's testimony explains that these barriers are persistent and that the existing shared CARE/FERA enrollment structure may further contribute to customer confusion, misclassification, and FERA under-enrollment.[1]

The record provides quantitative support for the magnitude of these barriers. The FERA Barriers Study cited in SCE's testimony found that only 57 percent of eligible households perceived themselves as likely to qualify for FERA and that marketing expenditures per dollar of FERA

[1] Exhibit SCE-03, pp. 71-72, 79-82.

benefit were 31 times higher than for CARE, demonstrating the greater difficulty of identifying and enrolling FERA-eligible households.[2] SCE's testimony further explains that FERA serves a narrow income band, does not permit categorical eligibility, and historically has been marketed with CARE through shared channels, which can obscure the distinction between the two programs.

The standalone FERA application is therefore intended to directly address these documented enrollment barriers by creating a clearer, FERA-specific pathway that distinguishes FERA from CARE and aligns the enrollment experience with FERA-specific outreach. It is not proposed as a stand-alone solution to FERA under-enrollment, but as part of SCE's broader strategy that includes targeted messaging, micro-campaigns, demographic and geographic targeting, geo-fencing, cross-promotion, third-party canvassing, and enhanced capitation support. The dedicated pathway also provides a means to measure FERA-specific application starts, completion, approval, abandonment, processing time, and acquisition source, allowing SCE to evaluate and refine the approach based on actual results.[3]

b. Does SCE contend that a standalone FERA application form will increase FERA enrollment relative to the counterfactual of a combined CARE/FERA form? Please explain why or why not.

SCE expects that a standalone FERA application may support increased FERA enrollment relative to the combined CARE/FERA form, but SCE cannot quantify the incremental enrollment effect before implementation.

The standalone application, however, is not proposed as a stand-alone solution to FERA under-enrollment. It is one component of SCE's broader FERA enrollment strategy, which includes FERA-specific messaging, targeted micro-campaigns, demographic and geographic targeting, geo-fencing, cross-promotion, additional data sources, third-party canvassing, and enhanced capitation support.[4] These measures are intended to work together to address persistent FERA awareness and participation barriers and increase sustainable FERA participation.

Because SCE has not previously implemented a dedicated FERA application, SCE does not have implementation data establishing the incremental enrollment effect of the standalone form relative to the combined form. Accordingly, SCE is not asserting that the standalone application, by itself, will cause a specific increase in FERA enrollment. Implementation will provide the data necessary to evaluate that effect.

c. In SCE's view, is it possible that a standalone FERA enrollment form may decrease FERA enrollment? Please explain why or why not.

Yes. Because SCE has not previously implemented a standalone FERA application, SCE cannot rule out the possibility that FERA enrollment could decrease following implementation. The actual

[2] Exhibit SCE-03, pp. 75-76.
[3] Exhibit SCE-10, pp. 57-59.
[4] Exhibit SCE-10, pp. 56-59; Exhibit SCE-03, pp.97,104-106.

impact cannot be determined until the standalone application is implemented and sufficient customer-response and enrollment data are available. SCE considers a decrease unlikely because the standalone application is designed to address documented enrollment barriers by providing a clearer FERA-specific pathway, reducing potential confusion between CARE and FERA, and better aligning the enrollment experience with FERA-specific outreach.[5]

SCE also proposes safeguards to minimize the risk of losing eligible customers. Customers who enter through one program pathway but appear eligible for the other would be evaluated using information and documentation already provided, reducing duplicative submissions and unnecessary customer burden.[6]

Finally, as discussed in response to Question 6(b), the standalone application is not intended as a stand-alone solution to FERA under-enrollment, but as one component of SCE's broader strategy to increase FERA participation. Accordingly, its impact should be evaluated in conjunction with SCE's broader FERA enrollment and outreach efforts.[7]

d. How would SCE evaluate whether a standalone FERA application form has increased or decreased FERA enrollment relative to the counterfactual of a combined CARE/FERA form?

SCE would evaluate the standalone FERA application by comparing pre- and post-implementation enrollment and application performance with relevant historical results under the combined CARE/FERA process. This comparison would assess whether the dedicated pathway is associated with increased or decreased FERA enrollment and improved application completion.[8]

The evaluation would include available measures such as application starts, completion and abandonment, approvals, acquisition source, and other digital-channel and campaign analytics. SCE would also consider customer feedback to identify potential confusion, usability issues, or other barriers affecting enrollment. These measures are consistent with SCE's data-driven marketing, measurement, and optimization framework.[9]

Because the standalone application is one component of SCE's broader FERA enrollment strategy, SCE would consider other factors that may affect enrollment rather than attribute changes solely to the application form, including FERA-specific outreach, targeted campaigns, SB 1130 eligibility expansion, and other program changes.

[5] Exhibit SCE-03, pp. 71-72, 79-82.
[6] Exhibit SCE-10, pp. 57-59.
[7] Exhibit SCE-03, pp. 97-105; Exhibit SCE-10, pp. 56-59.
[8] Exhibit SCE-10, pp. 57-59.
[9] Exhibit SCE-03, pp. 100-105.

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 1 0

To: TURN
Prepared by: Eugene Ayuyao
Job Title: Senior Advisor
Received Date: 10/30/2026

Response Date: 11/16/2026

Question 07:
SCE's rebuttal testimony at p. 57 discusses its proposal for a standalone FERA application form.

a. Under SCE's proposal, what are the isolated costs of the standalone FERA application form in each year of the IQPs cycle? Please identify the one-time set-up costs and ongoing annual costs of the standalone form, as compared to the combined CARE/FERA application form.
b. Under SCE's proposal, what are the other costs associated with the standalone FERA application form, such as costs to educate customers about the new form? Please identify all costs associated with the standalone form, and identify which budget category (e.g. FERA outreach) each cost falls into.

Response to Question 07:

a. Under SCE's proposal, what are the isolated costs of the standalone FERA application form in each year of the IQPs cycle? Please identify the one-time set-up costs and ongoing annual costs of the standalone form, as compared to the combined CARE/FERA application form.

SCE's proposal assumes separate CARE and FERA application forms. Consistent with that proposal, SCE's workpapers separately forecast Form Redesign and Reprint costs for each program. The isolated costs for the standalone FERA application are reflected in the FERA Form Redesign and Reprint budget within SCE's forecasted General Marketing and Outreach costs, totaling $580,000 before escalation.[1]

SCE did not separately classify these amounts as one-time setup versus ongoing costs. However, ongoing printing costs are expected to be generally comparable to those of a combined CARE/FERA application because printing volumes are driven primarily by the number of customers targeted for enrollment, rather than whether the forms are combined or separate. Accordingly, the primary incremental cost of separate applications is the initial design and setup of two forms instead of one. These setup costs are embedded within the Form Redesign and Reprint budgets and are minimal relative to the broader FERA Marketing and Outreach strategy. SCE considers this incremental investment reasonable because a standalone FERA application establishes a distinct enrollment pathway and supports more targeted, FERA-specific outreach.

[1] SCE Response to CforAT-SCE-001, Question 4c, reproduced in Exhibit SCE-10 Appendix B pp. B36-B37.

b. Under SCE's proposal, what are the other costs associated with the standalone FERA application form, such as costs to educate customers about the new form? Please identify all costs associated with the standalone form, and identify which budget category (e.g. FERA outreach) each cost falls into.

Other costs associated with implementing and communicating the standalone FERA application, including customer education and related outreach, will be absorbed within the FERA Form Redesign and Reprint as well as the General Marketing and Outreach budget. These activities are expected to be a small percentage of the cost relative to the overall FERA outreach budget and therefore were not separately forecasted or itemized as standalone-form costs.

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 1 0

To: TURN
Prepared by: Desiree Dunn
Job Title: Program Advisor
Received Date: 10/30/2026

Response Date: 11/16/2026

Question 08:
SCE's rebuttal testimony at p. 62 discusses its determination of capitation payments for CARE and FERA based on estimated outreach, labor, and processing expenses.

a. In the previous IQPs cycle, what was the average outreach cost per enrollee for enrollees introduced to (i) CARE and (ii) FERA through SCE's general marketing? Please provide underlying cost data and assumptions.
b. In the previous IQPs cycle, what was the outreach cost per enrollee for enrollees introduced to (i) CARE and (ii) FERA through CBO capitation?
c. If the answers to (a) and (b) differ, please explain why this might be the case. In SCE's view, why is outreach through SCE or CBOs generally more or less costly on a per-enrollee basis?

Response to Question 08:

a. SCE does not have information establishing a directly comparable average outreach cost per successful CARE or FERA enrollee attributable solely to SCE's general marketing during the 2021-2026 IQP cycle. SCE's reported Outreach expenditures encompass multiple activities and cost components rather than only costs associated with acquiring new enrollees. For example, SCE's historical reporting describes the Outreach category as including bill inserts, advertising, application printing and mailing, posters, brochures and flyers, postage, other outreach, staff labor, outbound dialing, the toll-free number, and the Capitation Fee Project.

   Accordingly, dividing total reported Outreach expenditures by total CARE or FERA enrollments would not provide a reliable measure of the cost of introducing and enrolling a customer through SCE general marketing. The numerator would include activities not solely attributable to customer acquisition, while the denominator would include enrollments that cannot necessarily be attributed to a particular marketing activity.

   This attribution issue is particularly relevant to FERA because certain outreach activities have historically been conducted jointly with CARE. For example, SCE's 2024 reporting states that dual-branded CARE/FERA media and ancillary communication costs were largely allocated to CARE and that FERA direct marketing was suspended during part of the year while annual solicitation activities were conducted.

b. SCE took an anecdotal approach for the CBO Capitation program. Under the capitation program, the authorized payment during the 2021-2026 cycle was $30 for each successful enrollment. This was an increase from $20 to account for cost-of-living increases as well as incentivizing CBO's efforts to enroll those in hard-to-reach populations, which require increased number of touches to identify those who have not yet been served.

   This was consistent with the prior rate of increases the commission previously adopted D.12-08-044, A history of the CARE capitation fees shows that the increase from $20 to $30 after eight years of being at the same rate offers a similar growth rate to past capitation rate increases:

   - 2001: $12 Capitation Fee originally set. D.01-05-033, OP 6-88
   - 2006: $15 Capitation Fee (25 percent increase after five years, average increase of 5 percent per year). D.06-12-038, OP 22-75
   - 2012: $20 Capitation Fee (33 percent increase after six years, average increase of 5.5 percent per year). D.12-08-044, OP 105-403
   - 2021: $30 Capitation Fee (50 percent increase after nine years, average increase of 5.5 percent per year).

c. SCE does not believe the general-marketing and capitation figures should be interpreted as directly comparable measures of channel efficiency because the two figures measure different things.

   General Outreach expenditures support a broad portfolio of customer-facing activities, including advertising, print and mail, outreach materials, outbound calling, and other activities. In contrast, the capitation payment is tied to a successful enrollment, making the expenditure directly identifiable on a per-enrollment basis.

   CBO outreach may also involve additional individualized effort. SCE's prior discovery response (24_TURN-SCE-005 Q24) explains that capitation agencies provide input and support regarding enrollment activities, customer education, document review, application processing, outreach challenges, and customer-assistance requirements.

   This distinction is particularly important for FERA. SCE's prior discovery response (24_TURN-SCE-005 Q24) explains that FERA requires greater outreach intensity because of lower customer awareness, narrower eligibility criteria, and the need for more targeted and sustained outreach**.**