**CPUC Docket:** A.26-01-003 et al.
**Exhibit Number:** TURN-10
**Date:** November 25, 2026

# A.26-01-003 et al.

# Ex. TURN-10

SCE responses to TURN DR 11, Questions 1-6

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

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

**To: TURN**
**Prepared by: Davi Ibarra**
**Job Title: Senior Advisor**
**Received Date: 11/4/2026**

**Response Date: 11/19/2026**

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**Question 01:**
Electrification and bill impact analysis

Pages 27-28 of SCE's Rebuttal Testimony states, "TURN recommends that the specific elements of a coordinated bill-impact methodology be developed through a future stakeholder process. In discovery, TURN confirmed that it did not develop formulas, inputs, assumptions, decision rules, analytical time horizons, or key metrics for the bill-impact methodology it recommends. TURN also did not quantify administrative costs or develop proposed staffing, systems, data-exchange, implementation, project-cycle, or customer-attrition effects. TURN's recommendation therefore identifies a useful objective for further coordination but does not provide a complete methodology that the Commission could adopt now as a program requirement. Because those elements remain undeveloped, any future coordinated methodology or Commission guidance would need to establish transparent analytical principles while preserving sufficient flexibility to account for utility-specific rates, service territories, program designs, data availability, housing conditions, and customer circumstances." Does SCE have any recommendations as to how to preserve sufficient flexibility to account for utility-specific rates, service territories, program designs, data availability, housing conditions, and customer circumstances? If so, please provide these recommendations.

**Response to Question 01:**

Yes. SCE recommends that any coordinated bill-impact methodology establish common analytical principles while preserving each utility's ability to apply those principles based on its applicable rates, service territory, program design, available data, and customer and project circumstances. As SCE previously explained in response to TURN-SCE-007, Question 3, SCE has not yet selected the bill analysis and rate optimization tool for the proposed 2028-2033 ESA Program. Accordingly, SCE recommends preserving flexibility in how common analytical principles are implemented rather than prescribing uniform analytical inputs, tools, or implementation methods across utilities.[1]

[1] Ex. SCE-02, Section IV.B.2.c, pp. 60-63; SCE Response to TURN-SCE-007, Question 3

For SCE, bill and rate analysis would be used as a decision-support tool during the home assessment and development of the customer's scope of work. Affordability would be evaluated at the customer and project level, consistent with SCE's proposed 2028-2033 ESA framework.[2]

[2] Ex. SCE-10, pp. 27–28; Ex. SCE-02, Section IV.B.2.c–d, pp. 60-64

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**Question 02:**
Electrification and bill impact analysis

Page 28 of SCE's Rebuttal Testimony states, "Coordination on analytical methods would not require joint administration or approval of individual customer projects. Each utility would remain responsible for the measures it funds and administers and for the resulting project decisions. At the customer level, SCE would use bill and rate analysis as a decision-support tool during the home assessment, present the resulting scope and estimated impacts to the customer, and allow the customer to decide whether to proceed. When information from another utility is needed to estimate combined bill impacts, the process should identify the required data, customer authorization, privacy and security protections, responsibility for performing and reviewing the analysis, and treatment of incomplete or unavailable information." Does SCE have any recommendations as to how the process can assist with collection of information from other utilities? How can the process best support electric only utilities?

**Response to Question 02:**

To facilitate access to gas usage information needed for bill analysis, SCE proposed that future ESA customers provide consent through the ESA application authorizing the sharing of gas usage data with other IOUs. SCE also requested that the Commission require IOUs to share gas usage data covered by that consent and committed to reciprocal data sharing with gas utilities when authorized, subject to applicable privacy and data-protection requirements.[1]

For an electric-only utility that does not possess a customer's gas usage information, such customer-authorized data-sharing could provide the gas usage information needed to estimate combined electric and gas bill impacts associated with electrification.[2]

[1] Ex. SCE-02, Section IV.B.2.c, p. 63
[2] Ex. SCE-02, Section IV.B.2.c, p. 63.

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**Question 03:**
Electrification and bill impact analysis

In SCE's experience, how often do customers choose to remain on fossil fuels when electrification is the more affordable option?

**Response to Question 03:**
SCE does not maintain data that identifies how often customers choose to retain fossil-fueled equipment specifically where electrification has been determined to be the more affordable option. Accordingly, SCE is unable to quantify the frequency requested.

For the ESA Building Electrification Pilot, the Pilot implementer's bill analysis tool incorporates historical energy usage, projected bill impacts, and applicable rate options, and provides an estimated annual bill impact for the proposed project.[1] SCE does not track customer declinations at the individual-measure level or the customer's reason for declining an individual measure. Accordingly, SCE cannot determine from its Pilot data the frequency requested.

[1] SCE Response to TURN-SCE-007, Question 3; Ex. SCE-02, Section IV.B.2.c, pp. 60-63.

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**Job Title: Advisor**
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**Question 04:**
Fund shifting and unspent funds

Page 15 of SCE's Rebuttal testimony states, "TURN similarly did not analyze the effect of its annual-offset proposal on the timing of collections or the ability to complete projects spanning program years, and it did not prepare a worked example applying the proposal to SCE's 2028–2033 budgets. TURN explains that it intends to continue the existing treatment of unspent and uncommitted funds. But applying that policy requires reliable differentiation between genuine, uncommitted balances and funding associated with executed contracts, approved projects, work in progress, encumbrances, invoices under review, and other multiyear obligations." Can SCE continue to differentiate unspent and uncommitted funds from spent and committed funds? If not, why not?

**Response to Question 04:**

Yes. SCE can differentiate unspent and uncommitted funds from amounts associated with existing program obligations. The concern identified in SCE's rebuttal is not SCE's ability to make that distinction, but the timing and reliability of the information needed to apply towards an annual offset.

Amounts associated with contracts, customer projects, work in progress, accruals, invoices under review, and other existing obligations may continue to be reconciled after the point at which the following year's collection request must be developed. As a result, a preliminary year-end balance may change as those obligations are completed and reconciled.

Accordingly, while SCE can identify and ultimately reconcile unspent and uncommitted funds, the final amount available for an offset may not be sufficiently known at the time the annual offset would need to be calculated. Applying an offset based on a preliminary balance therefore could reduce collections for amounts that are subsequently determined to be necessary to satisfy existing authorized program obligations.

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**Question 05:**
Fund shifting and unspent funds

Page 22 of SCE's Rebuttal Testimony states, "SCE supports transparent reporting, prudent fund management, and Commission oversight, but disagrees that predetermined limits or automatic adjustments would improve accountability. ESA costs and expenditures may vary across program years because of changes in equipment, material, and labor costs; project and contractual obligations; permitting and inspection schedules; equipment availability; contractor capacity; and invoicing timing. The Commission should preserve reasonable cycle-level budget flexibility while requiring SCE to report expenditures, obligations, implementation progress, and material transfers of funds between program years, consistent with applicable requirements."

a. Please provide examples of instances when SCE needed higher ESA portfolio budgets in a plan year than what was initially approved. Please describe the causes of each of these instances.

b. Please identify which of these instances required an increase in the ESA portfolio budget in excess of 10 percent of future year budgets.

**Response to Question 05:**

a. SCE identified one instance during the 2021–2026 program cycle when additional funding was needed above the amount initially available for an ESA Portfolio budget's plan year. In 2022, SCE filed Advice 4702-E, later supplemented by Advice 4702-E-A, to shift unused 2021 MF CAM funds to supplement the 2022 ESA Main budget, thus increasing the 2022 ESA Portfolio budget. The additional funds supported pending installations and SCE's transition and ramp-down of the prior ESA program model.

b. The approximately $14.7 million made available to supplement the 2022 ESA Portfolio budget exceeded 10 percent of SCE's authorized 2023 ESA Portfolio budget of $69.1 million. Advice 4702-E-A's $14.7 million fund shift represents 21.3% of the 2023 ESA Portfolio budget of $69.1 million.

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**Question 06:**
HCS measures

Page 22 of SCE's Rebuttal Testimony states, "SCE classifies certain measures across the appliance, domestic hot water, HVAC, maintenance, lighting, and miscellaneous categories as HCS because many of these measures have less than one annual therm savings, even though their annual kWh savings are greater than one."

a. Please identify the measures in the plan that have less than one annual kWh of electric savings and less than one annual therm savings (similar to the way other utilities are characterizing HCS measures).

b. Please provide the budget, savings, benefits, and cost-effectiveness for these measures by year and across all years of the plan.

**Response to Question 06:**

A. SCE does not have any measures in the plan that are characterized as HCS measures as having less than one annual kWh of electric savings and less than one annual therm savings.
B. Please see the above response to Question 6.a.