BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

DELIA LOVELL, Complainant, vs. SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), Defendant.	Case No. C.26-07-006 (Adjudicatory)

COMPLAINANT'S RESPONSE IN OPPOSITION TO SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) MOTION TO DISMISS

Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), Complainant Delia Lovell respectfully submits this Response in Opposition to the Motion to Dismiss filed by Southern California Edison Company (SCE) on August 27, 2026. The Motion should be denied. SCE asks the Commission to dismiss this Complaint with prejudice, yet SCE's own discovery responses, served on August 24, 2026, three days before SCE filed its Motion, affirmatively establish disputed issues of material fact that make dismissal improper. A defendant cannot obtain dismissal by producing records that prove the dispute is real.

I. INTRODUCTION AND SUMMARY OF OPPOSITION

This is a billing dispute. The Complaint alleges that SCE demands $14,713.65 that it cannot substantiate with itemized bills conforming to its filed tariffs, that SCE placed a $12,649.17 balance onto Complainant's account with no documented origin, and that SCE disconnected residential service on February 4, 2026 while an informal complaint was pending. Those allegations state violations of the Public Utilities Code and Commission rules, and they are now corroborated by SCE's own document production.

SCE's Motion rests on three grounds, and each fails on its own terms. First, SCE applies the wrong legal standard: it demands that Complainant "prove by a preponderance of evidence" at the pleading stage, which is the burden of proof at hearing, not the standard for a dispositive motion. Second, SCE treats the non-adjudicatory dispositions of its Consumer Affairs Branch informal complaints as though they preclude a formal adjudicatory complaint; they do not. Third, SCE attacks the damages figure in the prayer for relief, when the settled remedy for any relief outside the Commission's jurisdiction is to limit relief, not to dismiss a well-pleaded billing complaint.

Most importantly, SCE's own August 24, 2026 production does not close this dispute; it confirms it. SCE's own bill labels the disputed $12,649.17 a "Miscellaneous Transfer," not a metered charge tied to any tariff. SCE produced no bills predating December 2022 for a balance that its own records trace to 2022. The $13,601.73 figure that SCE swore in both its Answer and its Motion supported the February 4, 2026 disconnection appears on no document SCE produced. And SCE produced no record of the February 4, 2026 disconnection it admits it carried out. SCE also refused to produce the seven years of itemized bills Complainant expressly demanded, producing nothing before December 2022 and leaving the origin of the demanded balance unsubstantiated. These are precisely the material factual disputes that a motion to dismiss cannot resolve. The Motion should be denied and the matter set for discovery and hearing.

The accompanying Declaration of Delia Lovell and Exhibits 1 through 6 place SCE's own discovery responses before the Commission. They show that SCE, after Complainant expressly demanded seven years of itemized bills and asked that the December 2022 through May 2025 statements be produced again so that the record would be complete, produced no statement dated before December 21, 2022, and objected to all twenty-four of Complainant's data requests. On a motion measured by the summary-judgment standard, the burden is SCE's to show that there is no triable issue of fact. A party that seeks dismissal while withholding the very records that would establish whether its charges are lawful has not carried that burden. It is improper, and contrary to basic principles of fair procedure, to move to dismiss on the pleadings while refusing to produce the evidence that would resolve the dispute.

II. LEGAL STANDARD

A complaint satisfies Public Utilities Code section 1702 when it sets forth an act or thing done or omitted by a public utility, including any rule or charge, claimed to be in violation of any provision of law or of any order or rule of the Commission. SCE's own Motion states the governing standard and, in doing so, defeats itself. SCE cites Decision (D.) 14-03-032 for the rule that a motion to dismiss "requires the Commission to determine whether the party bringing the motion prevails based solely on undisputed facts and matters of law," and that the Commission "treats such motions as a court would treat motions for summary judgment in civil practice." Under that standard, dismissal is appropriate only where the evidence shows no triable issue as to any material fact and the moving party is entitled to judgment as a matter of law.

Two consequences follow, and both favor Complainant. First, as the moving party, SCE bears the burden of demonstrating the absence of any triable issue of material fact. Second, where material facts are genuinely in dispute, the Commission does not resolve them on the pleadings; the proper course is a hearing on the evidence. SCE also invokes the pleading standard from Everyday Energy Corp. v. San Diego Gas & Elec. Co. (D.12-03-037) and Re Western Gas Resources-California, Inc. (D.99-11-023), under which the Commission takes the well-pleaded factual allegations of the Complaint as true and dismisses only where the defendant is entitled to prevail as a matter of law. Under either standard SCE invokes, a genuine dispute of material fact requires denial of the Motion.

SCE's central error is to demand that Complainant "prove by a preponderance of evidence (a majority of 51 percent or more)" before any hearing has occurred. That is the burden of persuasion at an evidentiary hearing on the merits; it is not the standard for defeating a motion to dismiss or a motion for summary judgment. A complainant is not required to prove the case in order to survive a dispositive motion, and no authority SCE cites imposes such a burden. Requiring proof by a preponderance at the pleading stage would deny every complainant the evidentiary hearing that section 1702 contemplates and would convert every motion to dismiss into a trial on a paper record, without discovery and without cross-examination. The Commission should reject that inversion of the standard.

Complainant does not dispute that a complainant bears the burden of proof at an evidentiary hearing. But that burden is discharged at hearing, on a developed record, and discharging it requires the very discovery SCE has refused to provide. On this Motion the burden is different, and it is SCE's: as the moving party under the summary-judgment standard the Commission applies, see California Code of Civil Procedure section 437c and D.14-03-032, SCE must show the absence of any triable issue of material fact. SCE has not made, and on a record it has deliberately kept incomplete cannot make, that showing.

III. ARGUMENT

A. The Complaint Satisfies Section 1702 Because It Alleges Specific Violations of the Public Utilities Code and Commission Rules.

The Complaint alleges, and SCE's production confirms, conduct that, if proven, violates: Public Utilities Code section 451 (charges must be just and reasonable and service adequate); section 532 (a utility may collect only the charges its filed tariff schedules authorize, and no different compensation); SCE Tariff Rule 9 (Rendering and Payment of Bills); SCE Tariff Rule 17 (Adjustment of Bills and Meter Tests, including the three-year limitation on bill adjustments and the customer's right to be present at a meter test); and D.20-06-003 and Resolution E-5114 (residential disconnection protections and the Arrearage Management Plan). Each is a provision of law or a Commission rule. An allegation that SCE billed and sought to collect amounts not conforming to these authorities is exactly what section 1702 requires, and, taken as true, it is sufficient to defeat dismissal.

SCE's contrary assertion that "there is no evidence provided in the Complaint" misstates the standard and the record. It misstates the standard because a complaint pleads; it does not prove. And it misstates the record because the Complaint incorporates a line-by-line billing analysis and, in any event, the evidence of the dispute is now in SCE's own hands: SCE served it on August 24, 2026. A defendant cannot manufacture the disputed facts in discovery and then argue the complaint lacks evidentiary support.

B. SCE Cannot Substantiate the $14,713.65 It Demands, and Its Own Discovery Responses Confirm It Will Not Produce the Records That Would.

A utility may lawfully collect only the charges its filed tariff schedules authorize for service actually rendered. Public Utilities Code section 532 provides that a utility shall collect no more, no less, and no different compensation than the rates on file, and section 451 requires that every charge be just and reasonable. SCE Tariff Rule 9 requires that bills be rendered. It follows, as a matter of California law, that a party demanding payment of $14,713.65 must be able to substantiate that sum with itemized bills that tie the charges to metered service at tariffed rates for the periods billed. SCE cannot do so, and its August 24, 2026 discovery responses prove it.

Complainant's First Set of Data Requests sought precisely the records that would substantiate the balance: seven years of itemized bills (Data Request 1-01); every itemized bill on the origin account from its inception, so that the $12,649.17 could be traced to metered usage and tariff rates (Data Request 1-05); the documents authorizing the September 22, 2025 transfer and the tariff provision relied upon (Data Requests 1-06 and 1-07); the complete meter-reading and consumption history (Data Request 1-08); and a line-item reconciliation from $12,649.17 to $13,601.73 to $14,713.65 (Data Request 1-11). SCE produced none of it. It produced bills only from December 21, 2022 forward, and for every substantiating request it either objected outright or answered "See Attachment to Response DR 1-01" and "DR 1-03," pointing back to the same limited bill set, which does not contain the origin-account bills, the reconciliation, the transfer authorization, or the meter-reading history the requests sought.

The seven-year bill history is the clearest failure. Data Request 1-01 demanded seven years of itemized bills, reaching back to 2019, and Data Request 1-05 demanded every bill on the origin account from its inception. SCE produced nothing before December 21, 2022, and in the informal record it took the position that Complainant's request for the earlier statements "were not previously disputed or sought." SCE, not Complainant, generates and maintains these billing statements. That SCE would refuse to produce, to the very customer who demanded them, the bills underlying the balance SCE seeks to collect is telling: it leaves that balance unverifiable on SCE's own records. As a result, the first documented figure in the chain, the $1,202.95 prior balance appearing on the January 2023 bill, originates in an undocumented 2022 balance, and the origin of the entire $12,649.17 cannot be traced to service rendered on any bill SCE has produced. A charge that cannot be traced to service rendered at a tariffed rate is not substantiated under section 532, and whether SCE can substantiate the balance it demands is, at a minimum, a disputed question of material fact for hearing.

On the summary-judgment standard SCE itself invokes, this is dispositive of the Motion. SCE is the moving party and controls its own billing records. It cannot carry its burden to show the absence of a triable issue while withholding the very documents that would establish whether its charges conform to its tariffs. A utility that will not produce the records substantiating its own charges has not shown that it is entitled to judgment as a matter of law. SCE's own discovery responses are before the Commission as Exhibits 1 through 6 to the accompanying Declaration of Delia Lovell.

C. SCE's Own August 24, 2026 Discovery Responses Establish Disputed Issues of Material Fact That Preclude Dismissal.

A motion to dismiss cannot be granted where the record shows a genuine dispute of material fact. SCE's own production supplies that dispute at least six times over. Each item below is drawn from SCE's own bills, its own discovery responses, or its own pleadings.

1. The $12,649.17 is an undocumented "Miscellaneous Transfer." SCE's bill for the new account (No. 700981814038), prepared September 22, 2025 and produced in response to Data Request 1-03, lists the disputed $12,649.17 as a single line item labeled "Miscellaneous Transfer," with no service period, no meter reading, and no tariff citation. There is no tariff schedule line called "Miscellaneous Transfer." Whether a lump sum bearing that label conforms to SCE's filed tariffs under section 532 is a disputed question of material fact that cannot be resolved on the pleadings. Notably, SCE produced this document while objecting that the request was irrelevant.

2. SCE produced no bills predating December 2022. Data Requests 1-01 and 1-05 sought seven years of itemized bills and every bill on the origin account from its inception. SCE produced statements only from December 21, 2022 forward. The $12,649.17 traces, on SCE's own bills, to a prior balance whose first documented figure ($1,202.95) originates in 2022, yet the records that would document that origin were never produced. The origin of the demanded balance is therefore genuinely disputed, and a “Miscellaneous Transfer” of a balance whose origin was never billed is precisely the charge section 532 does not permit.

3. The $13,601.73 disconnection figure appears nowhere in SCE’s records. SCE’s Answer and its Motion both state that service was disconnected on February 4, 2026 for a past-due amount of $13,601.73. That figure does not appear on any bill, ledger, or notice SCE produced, including the 82-page combined invoice for the new account. SCE has thus asserted, twice, a past-due amount it cannot document, and the reconciliation from $12,649.17 to $13,601.73 to the current $14,713.65 is unproven on SCE’s own records. At present the $13,601.73 is a naked assertion.

4. The 2024 meter change is undocumented, and no meter-test record was produced. SCE’s bills reflect a change of meter in 2024 (from meter 308Z-298216 to meter 222014-690735) with no closing read on the old meter and no opening read on the new one. In response to a request for meter-test records and the notice of the right to be present required by Rule 17, SCE produced only a Consumer Affairs Branch letter reciting that a test occurred, not any test record and no right-to-be-present notice. Metered usage across the change, and the accuracy of the resulting charges, are disputed.

5. The February 4, 2026 disconnection, which SCE admits, is wholly undocumented. SCE admits in its Answer and its Motion that it disconnected service on February 4, 2026. In discovery it produced no disconnection order, no reconnection record, no disconnection notices with proof of mailing, and no record of the pre-disconnection communication it relies upon, and it offered no basis for disconnecting for a disputed balance on the very day informal complaint No. 716635 was filed, February 4, 2026. Compliance with the residential disconnection protections of D.20-06-003 is squarely disputed and cannot be adjudicated on the pleadings. That SCE reconnected the same morning without any upfront payment underscores that the disconnection’s propriety is a contested question for hearing.

6. A January 2025 bill is missing on SCE’s own running balance. SCE’s December 2024 statement closes at $9,189.68 and its February 2025 statement opens at $10,068.59, an increase of $878.91 for which no January 2025 statement was produced. A gap in the utility’s own billing sequence is a disputed material fact bearing directly on the validity of the demanded balance.

In addition, SCE’s own account of the transfer is internally contradictory. SCE’s Answer states that upon Arrearage Management Plan enrollment the prior balance “remains associated with the prior account, which becomes inactive.” But SCE’s own bill shows the opposite: the balance did not remain in place; it was affirmatively moved onto the new account on September 22, 2025 as a “Miscellaneous Transfer.” The mechanism, authority, and timing of that transfer are themselves in dispute.

Any one of these disputes would defeat dismissal. Together they show that the central question in this case, whether the amount SCE demands is lawful and substantiated, cannot be answered without a hearing on the evidence.

D. The Complaint Is Not Duplicative or Moot; the Informal Dispositions SCE Relies Upon Have No Preclusive Effect.

SCE contends the Complaint merely relitigates the informal complaints resolved by the Consumer Affairs Branch (CAB). It does not. The informal complaint process is a non-adjudicatory, staff-level review. A CAB disposition letter does not adjudicate the merits, makes no findings of fact after an evidentiary hearing, takes no discovery, and has no preclusive effect on a formal complaint. Each of the three CAB “not in violation” determinations SCE relies upon was a staff determination made without discovery and without SCE’s August 24, 2026 production. This formal adjudicatory proceeding is the first in which SCE has been required to produce its records, and those records are what create the disputes set out above.

The duplication and mootness defenses also fail on the timeline. The two events at the center of this Complaint postdate the earlier informal complaints entirely: the September 22, 2025 “Miscellaneous Transfer” of $12,649.17 and the February 4, 2026 disconnection both occurred after the 2023 and 2024 informal complaints and could not have been “duplicated” in them. Informal complaint No. 716635 was filed on February 4, 2026, the same day as the disconnection, and could not have adjudicated a disconnection that had just occurred or a documentary record SCE did not produce until August 24, 2026. The Complaint raises new facts on a current record, and the mootness and duplication defenses fail.

E. The Commission Has Jurisdiction Over the Core Relief Sought; the Damages Figure in the Prayer Does Not Warrant Dismissal of the Complaint.

The principal relief Complainant seeks is squarely within the Commission’s jurisdiction: an order correcting the account, voiding charges that do not conform to SCE’s tariffs, and directing reparation of amounts collected in violation of law or tariff. The Commission has express authority to order reparations under Public Utilities Code section 734, and to enforce sections 451 and 532, Tariff Rules 9 and 17, and D.20-06-003. The reparation component of the requested relief is within section 734.

To the extent the Motion challenges other components of the prayer, Complainant will conform the requested relief and the challenge does not support dismissal. First, to the extent the Complaint references penalties under Public Utilities Code sections 2101, 2107, and 2108, Complainant does not seek those penalties as a personal award; as SCE correctly observes, such penalties result from Commission enforcement and are directed to the General Fund. Complainant instead respectfully requests that the Commission refer this matter to its Safety and Enforcement Division for consideration of any penalty action, which is the proper vehicle. Second, to the extent the Complaint seeks consequential or tort damages (for injury, distress, or economic loss), the settled rule is that such damages are pursued in a civil court of competent jurisdiction under Public Utilities Code section 2106; Complainant does not ask the Commission to award consequential damages and will conform the prayer accordingly.

That division of authority is a reason to limit relief, not to dismiss the Complaint. SCE cites no authority holding that an over-broad prayer for relief defeats an otherwise well-pleaded billing, tariff, and disconnection claim. The proper course is for the Commission to retain and decide the billing, tariff, metering, transfer, disconnection, and reparation claims within its jurisdiction, and for Complainant to pursue any consequential damages, if at all, in the appropriate forum.

F. The Reference to Disability Discrimination Is Not a Basis to Dismiss the Complaint.

SCE argues that disability discrimination claims are outside the Commission's jurisdiction. Complainant does not ask the Commission to adjudicate discrimination as an independent cause of action, and to the extent any such theory is asserted, Complainant will pursue it in the appropriate forum. That concession does not dismiss the Complaint. The billing, tariff, metering, transfer, and disconnection claims that form the core of this proceeding rest on the Public Utilities Code and Commission rules, not on any discrimination theory, and they remain squarely within the Commission's jurisdiction. The residential disconnection protections of D.20-06-003 apply on utility-regulation grounds regardless of any discrimination allegation. Declining to reach one legal theory outside the Commission's jurisdiction is not a ground to dismiss the claims within it.

G. Dismissing Now, While SCE Withholds Discovery, Would Deny Due Process.

SCE moved to dismiss even as its August 24, 2026 responses objected to all twenty-four of Complainant's data requests and produced no document beyond the limited bill attachments to Responses DR 1-01 and DR 1-03. Seven requests drew pure objections with no production of any kind: the request to explain the non-issuance of bills (Request 2), the disconnection notices with proof of mailing (Request 16), the pre-disconnection communications and voicemail record (Request 18), the account-opening and credit records (Request 20), the CARE enrollment and recertification records (Request 21), the call recordings and account notes, including the calls in which SCE representatives stated they could not access records prior to June 20, 2025 (Request 22), and SCE's document-retention policy (Request 24). For the remaining substantive requests, SCE answered only "See Attachment to Response DR 1-01" or "DR 1-03," pointing back to bills that do not answer the question asked. SCE's objection-only responses are attached as Exhibit 6 to the accompanying Declaration. It is improper for SCE to seek dismissal of this Complaint while simultaneously withholding, on boilerplate relevance objections, the very records that would show whether the charges it demands are lawful. Complainant is entitled to develop the record through discovery before the Commission decides whether SCE's charges are lawful. Granting dismissal now, on a record SCE has deliberately kept incomplete, would reward the withholding and deny Complainant a fair opportunity to be heard. At a minimum, the Commission should deny the Motion, direct SCE to respond fully to the outstanding data requests, and set a schedule for testimony and hearing.

H. Dismissal With Prejudice Is Improper; Any Defect Should Be Cured by Leave to Amend.

SCE seeks dismissal with prejudice, the most drastic disposition available, which would foreclose all relief without a hearing. That remedy is inappropriate here. Genuine disputes of material fact exist on SCE's own records, discovery is ongoing, and any defect the Commission might identify in the pleading could be cured by amendment. Should the Commission identify any defect in the Complaint, the proper course is leave to amend, not dismissal with prejudice.

IV. CONCLUSION

Complainant remains willing to resolve this matter amicably and has asked SCE to meet and confer regarding the outstanding discovery. Dismissal is not a substitute for that process, and it is not warranted on this record. The Commission is respectfully directed to the accompanying Declaration of Delia Lovell and Exhibits 1 through 6, which set out SCE's own discovery responses and the documents SCE produced and withheld.

For the foregoing reasons, Complainant respectfully requests that the Commission: (1) deny SCE's Motion to Dismiss; (2) set a schedule for discovery, the exchange of testimony, and an evidentiary hearing on the disputed billing, metering, transfer, and disconnection issues; (3) direct SCE to respond fully to Complainant's outstanding data requests; and (4) grant such other relief as is just. Should the Commission identify any defect in the Complaint, Complainant requests leave to amend rather than dismissal.

Respectfully submitted,

Signature

Delia Lovell
Complainant, In Propria Persona
Post Office Box 657, Lake Arrowhead, California 92352
Telephone: (310) 770-6026
Email: admin@lovelltrust.com

August 28, 2026
Date

CERTIFICATE OF SERVICE

I certify that on the date signed below, I filed the foregoing COMPLAINANT'S RESPONSE IN OPPOSITION TO SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) MOTION TO DISMISS with the Commission's Docket Office through the Commission's electronic filing system, and served a copy by electronic mail on all parties on the official service list for C.26-07-006. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Signature

Delia Lovell
Complainant, In Propria Persona

August 28, 2026
Date

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

DELIA LOVELL, Complainant, vs. SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), Defendant.	Case No. C.26-07-006 (Adjudicatory)

DECLARATION OF DELIA LOVELL IN SUPPORT OF COMPLAINANT'S RESPONSE IN OPPOSITION TO SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) MOTION TO DISMISS

I, Delia Lovell, declare as follows:

1. I am the Complainant in this proceeding and I represent myself. I have personal knowledge of the facts stated in this declaration, and if called as a witness I could and would testify competently to them.

2. On August 18, 2026, I served my First Set of Data Requests on Southern California Edison Company (SCE). On August 24, 2026, SCE served its written responses and the documents accompanying them. The documents attached as Exhibits 1 through 6 are true and correct copies of SCE's written responses and of the documents SCE produced with those responses.

3. Attached as Exhibit 1 is SCE's response to Data Request 1-03 and the September 22, 2025 billing statement on Account No. 700981814038. That statement records the disputed balance as a single line item labeled "Miscellaneous Transfer $12,649.17," with no service period, no meter reading, and no tariff citation.

4. Attached as Exhibit 2 is SCE's response to Data Requests 1-01 and 1-05. Data Request 1-01 demanded every itemized bill for the seven years preceding SCE's response, that is, from about August 2019 forward, and Data Request 1-05 demanded every bill on the origin account from its inception. In response, SCE produced only the Appeal of Informal Complaint No. 716635, which contains statements from December 21, 2022 forward, and it produced no bill predating December 21, 2022.

5. Attached as Exhibit 3 is SCE's response to Data Requests 1-06, 1-07, and 1-11. SCE did not identify any tariff authority for the September 22, 2025 transfer and did not provide a line-item reconciliation from $12,649.17 to $13,601.73 to $14,713.65. The figure $13,601.73, which SCE states in its Answer and its Motion is the past-due amount that supported the February 4, 2026 disconnection, appears on no statement SCE produced, including the June 2025 to July 2026 combined invoice.

6. Attached as Exhibit 4 is SCE's response to Data Request 1-09. I requested meter-test records and the notice of the right to be present required by Rule 17. SCE produced only the September 18, 2023 Consumer Affairs Branch disposition letter, which recites that a test occurred. SCE produced no meter-test record and no right-to-be-present notice.

7. Attached as Exhibit 5 is SCE's response to Data Requests 1-13, 1-15, and 1-17, together with the June 2025 AMP Application Approval Letter, the July 2025 Missed Payment Letter, and the August 2025 AMP Removal Letter. In response to my request for documents concerning the February 4, 2026 disconnection and same-day reconnection (Data Request 1-17), SCE pointed to these AMP letters and produced no disconnection order, no disconnection notices with proof of mailing, and no reconnection record.

8. Attached as Exhibit 6 is SCE's response to Data Requests 1-02, 1-16, 1-18, 1-20, 1-21, 1-22, and 1-24. SCE objected to each and produced no documents concerning the non-issuance of bills, the disconnection notices it references from October, November, and December 2025, the pre-disconnection communications and voicemail it relies upon, the account-opening and credit records, the CARE enrollment and recertification records, the call recordings and account notes, or its document-retention policy.

9. Across all twenty-four of my data requests, SCE produced no itemized bill predating December 21, 2022, no account ledger or transaction history, no document authorizing the September 22, 2025 transfer, no meter-test record, and no record of the February 4, 2026 disconnection.

10. I make this declaration in support of my Response in Opposition to SCE's Motion to Dismiss in Case No. C.26-07-006.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Lake Arrowhead, California.

Delia Lovell

Signature

Delia Lovell
Complainant, In Propria Persona

August 20, 2026
Date

INDEX OF EXHIBITS

Exhibit 1. SCE's response to Data Request 1-03 and the September 22, 2025 statement on Account No. 700981814038 recording the "Miscellaneous Transfer $12,649.17."

Exhibit 2. SCE's response to Data Requests 1-01 and 1-05 (seven-year and origin-account bill history; nothing produced before December 21, 2022).

Exhibit 3. SCE's response to Data Requests 1-06, 1-07, and 1-11 (no tariff authority for the transfer; no reconciliation; $13,601.73 appears nowhere).

Exhibit 4. SCE's response to Data Request 1-09 (no meter-test record and no right-to-be-present notice; only the September 18, 2023 CAB letter).

Exhibit 5. SCE's response to Data Requests 1-13, 1-15, and 1-17, with the AMP Approval, Missed Payment, and Removal letters (no disconnection records produced).

Exhibit 6. SCE's objection-only responses to Data Requests 1-02, 1-16, 1-18, 1-20, 1-21, 1-22, and 1-24 (no documents produced).

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Delia Lovell v. Southern California Edison Company (U 338-E) | Case No. C.26-07-006

EXHIBIT 1

SCE's DR 1-03 Response and the September 22, 2025 statement
(Account 700981814038) recording the
'Miscellaneous Transfer' of $12,649.17

Attached to and incorporated in the Declaration of Delia Lovell in support of Complainant's Response in Opposition to SCE's Motion to Dismiss

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET Lovell-SCE-Discovery_001

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-03:
Produce the complete account ledger and transaction history for the Active Account for the Relevant Period, showing every charge, payment, credit, adjustment, transfer, late-payment charge, and interest item, with the date, amount, and the Itemized Bill on which each appears. (§§ 451, 532.)

Response to Question DR1-03:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is unduly burdensome, vague and ambiguous, and calls for legal conclusion.

Subject to and without waiving the foregoing objection, SCE responds as follows:

See Attachment to Response DR1-01, which incorporated billing statements for service dates December 21, 2022, through May 27, 2025, for Customer Account Number 700619044849.

Customer Account Number 700981814038 was created upon Arrearage Management Plan (AMP) enrollment.

Please see attachment, which includes billing statements for Customer Account Number 700981814038 for service dates May 28, 2025, through July 22, 2026.

Go paperless at **www.sce.com/ebilling.** It's fast, easy and secure.

SOUTHERN CALIFORNIA EDISON®
An EDISON INTERNATIONAL® Company

For billing and service inquiries
1-800-684-8123
www.sce.com

Your electricity bill

Customer account
700981814038

Rotating outage
Group N001

Amount due $13,035.93

Service account
8020295884
325 EMERALD DRIV
LAKE ARROWHEAD, CA 92352

POD-ID
101760940001762016

Date bill prepared
09/22/25

DISCONNECTION

Your account summary

Your previous balance	$254.67
Past due amount	$254.67
Your new charges	$132.09
Miscellaneous Transfer	$12,649.17
Total amount you owe	**$13,035.93**

Disconnection of service notice.
You must pay the past due amount of $203.42 to avoid disconnection. *If you are not able to pay your bill, call SCE at 1-800-950-2356 to discuss how we can help. You may qualify for bill payment options, including a 12-month payment plan, and financial programs available to assist you such as SCE's CARE and FERA programs, that can help to reduce your bill. We can also connect you with community agencies that can provide additional assistance to you, and you may also qualify for SCE's Energy Savings Assistance (ESA) program which is an energy efficiency program for income-qualified residential customers. To pay in person, call 1-800-747-8908 for locations.*

Your past and current electricity usage

For meter 222014-690735 from 08/21/25 to 09/21/25
Total electricity you used this month in kWh **601**

Your next billing cycle will end on or about 10/20/25.

Please return the payment stub below with your payment and make your check payable to Southern California Edison.
If you want to pay in person, call 1-800-747-8908 for locations, or you can pay online at www.sce.com.

(14-574) Tear here Tear here

SOUTHERN CALIFORNIA EDISON®
An EDISON INTERNATIONAL® Company

Customer account 700981814038
Please write this number on the memo line of your check. Make your check payable to Southern California Edison.

Disconnection - pay immediately	$203.42
Past due charges - pay by 10/13/25	$51.25
New charges - pay by 10/13/25	$12,781.26
Total amount you owe	**$13,035.93**
Amount enclosed	$

STMT 09222025 P

LOVELL, DELIA
BOX 657
325 EMERALD
LAKE ARROWHEAD CA 92352

P.O. BOX 600
ROSEMEAD, CA 91771-0002

700981814038 0000168 000025467001278126001303593

Ways to contact us

Request a large print bill 1-800-655-4555

Customer service numbers	*Relay calls accepted*
General Services (U.S. & Canada)	1-800-655-4555
Payments, Extensions or Payment Options	1-800-950-2356
Emergency Services & Outages	1-800-611-1911
California Alternate Rates for Energy (CARE)	1-800-447-6620
Energy Theft Hotline	1-800-227-3901
Hearing & Speech Impaired (TTY)	1-800-352-8580

Multicultural services	
Cambodian / ខ្មែរ	1-800-843-1309
Chinese / 中文	1-800-843-8343
Korean / 한국어	1-800-628-3061
Vietnamese / Tiếng Việt	1-800-327-3031
Spanish / Español	1-800-441-2233

Correspondence:
Southern California Edison
P.O. Box 6400
Rancho Cucamonga, CA
91729-6400

www.sce.com

Important information

What are my options for paying my bill?

On-line	Pay one-time or recurring on **www.sce.com/bill**	
Mail-in	Check or Money order	
In Person	Authorized payment locations	1-800-747-8908
Phone	QuickCheck	1-800-950-2356
	Debit & credit card	1-833-425-1440
Other	PayPal, Venmo, Apple Pay and Google Pay	

Electronic check processing

Your check payment will be processed as a one-time Electronic Fund Transfer (EFT). With EFTs, funds may be withdrawn from your account the day we receive your payment. Your check will not be returned, but will appear on your financial statement.

Rates and applicable rules: Available at www.sce.com or upon request.

Past due bills

When is my bill past due? It is past due 20 days after the preparation date, which was 09/22/25.

- Reconnecting service that has been disconnected requires a Service Connection payment (non-residential only).
- Unable to pay: If payment arrangements were not extended to you by SCE pursuant to SCE's filed tariffs, you may contact the California Public Utilities Commission.
- For safety reasons, if service is disconnected, please ensure any sensitive or potentially hazardous equipment is unplugged on the day of reconnection. For additional home safety tips, visit www.sce.com/safety or call SCE at 1-800-655-4555.

What is the Late Payment Charge (LPC)?

0.6% will be applied to the total unpaid balance if payment is not received by the due date on this bill (except for CARE and state agency accounts).

What is a rotating outage?

Rotating outages are controlled electrical outages used to avoid widespread or uncontrolled blackouts. Your Rotating Outage Group number is located on page 1, upper left, of your SCE bill. Your rotating outage group number may change at any time. For more information, visit www.sce.com/rotating outage.

What is the Power Charge Indifference Adjustment (PCIA)?

The PCIA is a charge to ensure that both SCE customers and those who have left SCE service to purchase electricity from other providers pay for the above market costs for electric generation resources that were procured by SCE on their behalf. 'Above market' refers to the difference between what the utility pays for electric generation and current market prices for the sale of those resources.

Disputed bills

If you believe there is an error on your bill *or have a question about your service, please call* ***Southern California Edison (SCE)*** *customer support at* ***1-800-655-4555****. If you are not satisfied with SCE's response, submit a complaint to the California Public Utilities Commission (CPUC) at www.cpuc.ca.gov/complaints/. The CPUC's Consumer Affairs Branch (CAB) handles billing and service complaints and can be reached by:*
Telephone 1-800-649-7570 (8:30 AM - 4:30 PM, Monday - Friday)
Mail CPUC, Consumer Affairs Branch, 505 Van Ness Ave., Room 2003, San Francisco, CA 94102
If you have limitations hearing or speaking, contact the California Relay Service, which is for those needing assistance relaying telephone conversations. Dial 711 or one of the numbers below to be routed to a California Relay Service provider in your preferred mode of communication.

Type of Call	*English*	*Spanish*
TTY/VCO/HCO to Voice	*1-800-735-2929*	*1-800-855-3000*
Voice to TTY/VCO/HCO	*1-800-735-2922*	*1-800-855-3000*
Speech-to-Speech Relay	*1-800-854-7784*	*1-800-854-7784*

To avoid having service turned off while waiting for the outcome of a complaint to the CPUC regarding the accuracy of your bill, contact CAB for assistance. If your case meets the eligibility criteria, CAB will instruct you on how to mail a check or money order to be impounded pending resolution of your case. You must continue to pay your current charges while your complaint is reviewed to keep your service turned on.

Definitions

- **Baseline Credit:** The baseline credit provides reduced electricity rates on electricity used up to the baseline allocation for the region that you live in.
- **CA Climate Credit:** Credit from state effort to fight climate change. Applied monthly to eligible businesses and semi-annually to residents.
- **Wildfire Fund Charge:** Supports the California Wildfire Fund which covers costs associated with catastrophic wildfires, including payment of bonds issued by the California Department of Water Resources (DWR)
- **Public Purpose Programs Charge:** Funds state-mandated programs for low income discounts, energy efficiency, renewable energy and R&D.
- **SCE Generation:** For recovering energy procurement and generation costs for that portion of your energy provided by SCE.

To change your contact information or enroll in SCE's payment option, complete the form below and return it in the enclosed envelope.

Change of mailing address: 700981814038

STREET#	STREET NAME		APARTMENT #
CITY		STATE	ZIP CODE
TELEPHONE #	E-MAIL ADDRESS		

Direct Payment (Automatic Debit) Enrollment: 700981814038

I hereby authorize SCE and my financial institution to automatically deduct my monthly payment from the checking account as shown on my enclosed check, ten calendar days after my bill is mailed.

Signature ________________________ Date ____________

To change your checking account information or to be removed from the Direct Payment program please call SCE at 1-800-655-4555.

Energy Assistance Fund (EAF): I want to help people pay their energy bill through EAF. For info visit www.sce.com/eaf or call (800) 205-8596.

Add this amount for EAF $ ____________

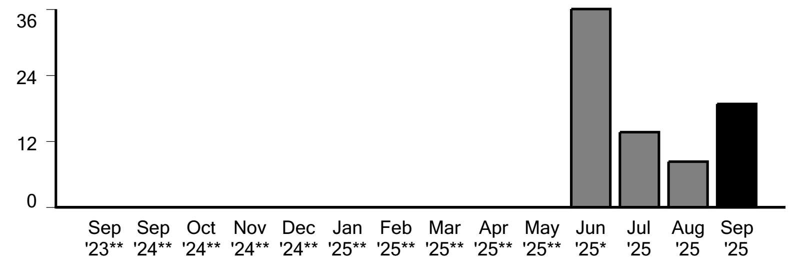
Select one box only and sign below for EAF:

☐ Every Month ☐ One Month only

____

Your daily average electricity usage (kWh)

2 Years ago: N/A Last year: N/A This year: 18.78



* Irregular billing period
** No data available

Details of your new charges

Your rate: D-CARE
Billing period: 08/21/25 to 09/21/25 (32 days)

Delivery charges - *Cost to deliver your electricity*		
Basic charge	32 days x $0.03100	$0.99
Energy-Summer		
Tier 1 (within baseline)	470 kWh x $0.19160	$90.05
Tier 2 (over baseline)	131 kWh x $0.28410	$37.22
CARE discount		-$63.28
Generation charges - *Cost to generate your electricity*		
SCE		
Energy-Summer		
Tier 1 (within baseline)	470 kWh x $0.11136	$52.34
Tier 2 (over baseline)	131 kWh x $0.11136	$14.59
Subtotal of your new charges		$131.91
State tax	601 kWh x $0.00030	$0.18
Your new charges		**$132.09**

Your Delivery charges include:
- *$14.13 transmission charges*
- *$103.36 distribution charges*
- *-$8.23 conservation incentive adjustment*
- *$12.64 public purpose programs charge*
- *$5.88 new system generation charge*

Your Generation charges include:
- *-$0.35 competition transition charge*
- *-$20.68 power charge indifference adjustment (PCIA)*

Your overall energy charges include:
- *$1.22 franchise fees*

Additional information:
- *Service voltage: 240 volts*
- *Your summer baseline allowance: 470.0 kWh*

Your Total Usage: **601 kWh**	Tier 1	Tier 2
Understanding Your Bill... *Your usage for the billing period falls into **Tier 2**. For most customers, the price you pay increases as you use more energy. The average cost per kilowatt (kWh) in the chart to the right is based on averages. Actual prices may vary.*	470 kWh	131 kWh
	$0.30/kWh	$0.40/kWh
		Your Total Usage 601 kWh

Things you should know

Fixed Recovery Charge

SCE has been permitted to issue bonds that enable it to recover more quickly certain costs related to preventing and mitigating catastrophic wildfires. Your bill for electric service includes a Fixed Recovery Charge that has been approved by the CPUC to repay those bonds. The right to recover the Fixed Recovery Charge has been transferred to a separate entity (called the Special Purpose Entity) that issued the bonds and does not belong to SCE. SCE is collecting the Fixed Recovery Charge on behalf of the Special Purpose Entity.

Stay in Control

If you're behind on payments, enrolled in a payment plan, or facing disconnection, we offer options and energy management solutions to help you stay in control of your bill and costs. Learn more at www.sce.com/billsupport.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Delia Lovell v. Southern California Edison Company (U 338-E) | Case No. C.26-07-006

EXHIBIT 2

SCE's DR 1-01 and DR 1-05 Responses
(seven-year and origin-account bill history;
nothing produced before December 21, 2022)

Attached to and incorporated in the Declaration of Delia Lovell in support of Complainant's Response in Opposition to SCE's Motion to Dismiss

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET Lovell-SCE-Discovery_001

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-01:
Produce every Itemized Bill rendered on the Active Account for the full seven (7) years preceding the date of Your response, that is, on or about August 2019 through the present, one for each consecutive monthly or bi-monthly billing or service period, with no gaps. This request specifically includes, and is not limited to, the period from December 21, 2022 through May 27, 2025 that SCE represents in its Answer it already provided; produce those statements again here so the billing record before the Commission is complete. (Rule 9; §§ 451, 532.)

Response to Question DR1-01:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence and on the grounds that this request is overly broad and unduly burdensome and calls for legal conclusion.

Subject to and without waiving the foregoing objection, SCE responds as follows:

See attached Appeal of Informal Complaint No. 716635, which incorporated billing statements for service dates December 21, 2022, through May 27, 2025, for Customer Account Number 700619044849 as well as a March 9, 2026, email from SCE explaining the Arrearage Management Plan (AMP) and other issues.

See also Attachment to Response DR1-03, which includes billing statements from June 2025 to July 2026.

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-05:
Produce every Itemized Bill rendered on the Origin Account from its inception through its closure or transfer, so that the $12,649.17 can be traced to metered usage and tariff rates for stated service periods. (Rule 9; §§ 451, 532.)

Response to Question DR1-05:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is unduly burdensome, vague and ambiguous and calls for legal conclusion.

Subject to and without waiving the foregoing objection, SCE responds as follows:

See Attachment to Response DR1-01.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Delia Lovell v. Southern California Edison Company (U 338-E) | Case No. C.26-07-006

EXHIBIT 3

SCE's DR 1-06, DR 1-07, and DR 1-11 Responses
(no tariff authority for the transfer; no reconciliation;
the $13,601.73 figure appears nowhere)

Attached to and incorporated in the Declaration of Delia Lovell in support of Complainant's Response in Opposition to SCE's Motion to Dismiss

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-06:
Produce all Documents evidencing the transfer of $12,649.17 (or any amount) from the Origin Account to the Active Account on or about September 22, 2025, including the authorization for the transfer, the billing-system record memorializing it, the tariff provision relied upon, and the identity of the SCE personnel who directed and executed it. Case No. C.26-07-006

Response to Question DR1-06:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is unduly burdensome, vague and ambiguous, misstates facts, and calls for legal conclusion.

Subject to and without waiving the foregoing objection, SCE responds as follows:

See Attachment to Response DR1-01.

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-07:
State the tariff rule or Commission authority under which SCE transferred a balance from one account to another, and state whether the three-year limitation of Rule 17 was applied to the transferred amount. If it was not applied, explain in detail why not. (Rule 17.)

Response to Question DR1-07:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is vague and ambiguous, and calls for legal conclusion

Subject to and without waiving the foregoing objection, SCE responds as follows:

SCE reviewed the account history and confirmed that monthly billing statements were issued on a timely basis and accurately reflected the account balance, payments, and ongoing charges. Because the account was not subject to delayed billing or previously unbilled service, SCE determined that the billing protections and adjustment provisions contained in Rule 17 are not applicable to the circumstances presented in this complaint.

Please see also the Attachment to Response DR1-01.

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-11:
Provide a line-item reconciliation showing how the balance moved from $12,649.17 (the sum SCE states accrued before AMP enrollment) to $13,601.73 (the past-due amount SCE states supported the February 4, 2026 disconnection) to $14,713.65 (the current balance SCE states in its Answer), identifying each intervening charge, fee, and interest item by date, amount, tariff authority, and the Itemized Bill on which it appears. (§§ 451, 532.)

Response to Question DR1-11:

SCE objects to this request as overly broad and unduly burdensome and calls for legal conclusion.

Subject to and without waiving the foregoing objection, SCE responds as follows:

See Attachments to Response DR1-01 and DR1-03.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Delia Lovell v. Southern California Edison Company (U 338-E) | Case No. C.26-07-006

EXHIBIT 4

SCE's DR 1-09 Response and the

September 18, 2023 CAB Disposition

(no meter-test record; no right-to-be-present notice)

Attached to and incorporated in the Declaration of Delia Lovell in support of Complainant's Response in Opposition to SCE's Motion to Dismiss

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-09:
Produce all meter-test records for any meter serving the Service Property, including the test SCE states was performed on or about August 24, 2023, together with any notice provided to Complainant of the right to be present for a meter test. (Rule 17.)

Response to Question DR1-09:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is unduly burdensome, vague and ambiguous, and calls for legal conclusion

Subject to and without waiving the foregoing objection, SCE responds as follows:

See Attachment, September 18, 2023, Commission Disposition Letter to Informal Complaint No. 594987.

PUBLIC UTILITIES COMMISSION
320 W. 4th STREET, SUITE 520
LOS ANGELES, CA 90013

September 18, 2023

Delia Lovell
468 N Camden Dr
Beverly Hills CA 90210

Subject: Commission File No: 594987 for Complaint with Southern California Edison Company

Dear Delia Lovell:

The Consumer Affairs Branch (CAB) of the California Public Utilities Commission (CPUC) has completed its review of your complaint against **Southern California Edison Company (SCE)**. As part of the review, CAB considered the information that you provided, the information that **SCE** provided to us about your account and applicable codes, orders and tariffs.

In your complaint to CAB, you stated that your January 3, 2023 bill was $1,202.95 vs your previous bill on December 10, 2022 of $97.62. You stated on January 25, 2023 your bill then increased 2000 times more to $2,335.06. You contend there has been no change in your usage pattern and/or equipment that would explain these increases. You stated you received a disconnection notice for May 24, 2023 if the amount due of $4,395.75 wasn't paid. You stated the loss of power would cause physical harm as you are disabled. You expressed that you felt this is a racially motivated hate crime.

SCE investigated and reported to CAB that their Senior Supervisor, Leticia Hernandez indicated she spoke with you on August 23, 2023 in regard to your concerns. Ms. Hernandez states you opted out of the Smart Meter therefore your meter is read bi-monthly; some months the reads are low, but are then followed by higher than normal bill the next month. Ms. Hernandez states a meter test was issued followed by a subsequent request to have the Billing Department review your monthly statement. Ms. Hernandez states you agreed with this action plan and stated that you did not have an issue paying the bill, but wanted to confirm the charges were accurate.

Further, Ms. Hernandez states she received the results for the meter test that found the meter is operating appropriately and registering consumption accurately within the guidelines of the CPUC. Ms. Hernandez states late payment charges accrued in the amount of $112.40 from March 6, 2023 – August 17, 2023 were reversed to your account as well as being granted a 30-day extension for the balance currently on the account.

Lastly, Ms. Hernandez states the aforementioned information was provided to you via email on September 12, 2023, along with her direct contact information should you have additional questions regarding this matter.

Based on the review of this information, CAB has determined that **SCE** is not in violation of the rules or regulations of the CPUC. If you disagree with this result, you may either provide new evidence or appeal. Detailed instructions for sending new evidence or an appeal are attached. You must file within 15 days of this letter and include supporting documentation. Please provide any information you believe contradicts the utility's representations.

PUBLIC UTILITIES COMMISSION
320 W. 4th STREET, SUITE 520
LOS ANGELES, CA 90013

Sincerely,

Keya S.
Consumer Affairs Branch
1-800-649-7570

Enclosure: informal appeal procedure

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Delia Lovell v. Southern California Edison Company (U 338-E) | Case No. C.26-07-006

EXHIBIT 5

SCE's DR 1-13, DR 1-15, and DR 1-17 Responses with the
AMP Approval, Missed-Payment, and Removal letters
(no disconnection records produced)

Attached to and incorporated in the Declaration of Delia Lovell in support of Complainant's Response in Opposition to SCE's Motion to Dismiss

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-13:
Produce all Documents evidencing Complainant's enrollment in AMP, including the signed or recorded consent or authorization, the enrollment date, and the enrolled arrearage amount, consistent with D.20-06-003 and Resolution E-5114.

Response to Question DR1-13:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is unduly burdensome and calls for legal conclusion.

Subject to and without waiving the foregoing objection, SCE responds as follows:

See Attachment; SCE mailed an AMP application approval letter on June 4, 2025, explaining the AMP program and details about the past-due account balance.

See also Attachments to Response DR1-01 and DR1-03.

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET Lovell-SCE-Discovery_001

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-15:
Produce all Documents evidencing the missed AMP payments SCE alleges ($202.21 due July 10, 2025, and $94.38 due August 12, 2025), every notice of default or removal SCE issued, and the date SCE removed Complainant from AMP. Case No. C.26-07-006

Response to Question DR1-15:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is unduly burdensome, vague and ambiguous, misstates facts, and calls for legal conclusion.

Subject to and without waiving the foregoing objection, SCE responds as follows:

See Attachments, July 2025 Missed Payment Letter and August 2025 AMP Removal Letter.

See Attachments to Response DR1-01 and DR1-03.

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-17:
Produce all Documents concerning the February 4, 2026 disconnection and same-day reconnection, including whether Complainant was enrolled in, or eligible for, AMP disconnection protection at that time, and SCE's basis for disconnecting while informal complaint No. 716635 was pending. (D.20-06-003.)

Response to Question DR1-17:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is unduly burdensome and calls for legal conclusion.

Subject to and without waiving the foregoing objection, SCE responds as follows:

See Attachments to Response DR1-01, DR1-03, DR1-13, and DR1-15.

SOUTHERN CALIFORNIA
EDISON
Energy for What's Ahead

June 04, 2025

IMPORTANT INFORMATION ABOUT YOUR ARREARAGE MANAGEMENT PLAN (AMP) APPLICATION

Delia Lovell
325 Emerald
Lake Arrowhead, CA 92352-9235

for Customer Account Number
700981814038

at Service Address
325 EMERALD DRIV

Dear Valued Customer,

Thank you for applying for the Arrearage Management Plan (AMP). We have approved your application, and you have taken the first step toward reducing your past-due account balance.

How AMP works.

AMP provides our eligible customers a maximum of $8,000 in past-due debt forgiveness. However, because your current past-due amount of $12,649.17 exceeds this maximum, you are responsible for paying $4,649.17. You may choose (but are not required) to make monthly payments toward this amount, in addition to your current monthly bill, while you are enrolled in AMP.

Each month, when you pay your current bill in full and by the due date, we will credit your account $666.67. At the end of 12 months, after you've successfully paid your monthly bills on time, a total of $8,000 will have been credited toward your past-due balance. Any balance due at the end of the 12 months will still be your responsibility.

After your third, sixth, and ninth on-time payment, we will send you a summary of your payments, your applied program credits, and your remaining past-due balance. Your future bills will show this new Customer Account Number: 700981814038. Please be sure to reference this new account number when making your payments.

It is important to pay your bill on time.

To stay enrolled in AMP, it is important for you to continue making your payments on time. We will remove your account from AMP if:

- You do not pay two consecutive bills by the due date, or
- You do not pay three non-consecutive bills by the due date.

If we remove your account from AMP, you will have to pay your remaining past-due balance in full to continue receiving SCE service. Any amount already credited will not be charged back.

If we remove your account from AMP and you would like to re-enroll, there is a 12-month waiting period, if you are eligible. We also have other payment options available to help you. To learn more, please visit **sce.com/billhelp**.

We look forward to you reaching the maximum amount of debt forgiveness from the AMP program. If you have questions, please call us at **1-800-655-4555**, Monday - Friday, 8 a.m. - 5 p.m., and a Customer Service representative will be glad to assist you. For more information, please visit **sce.com/amp**.

Sincerely,

Veronica Saakyan

Veronica Saakyan
Principal Manager, Customer Programs & Services
Southern California Edison

SOUTHERN CALIFORNIA
EDISON
Energy for What's Ahead

July 23, 2025

YOUR ACTION IS REQUIRED

IMPORTANT INFORMATION ABOUT YOUR ARREARAGE MANAGEMENT PLAN (AMP) PAYMENT

Delia Lovell
325 Emerald
Lake Arrowhead, CA 92352-9235

for Customer Account Number
700981814038

at Service Address
325 EMERALD DRIV

Dear Valued Customer,

We understand it may sometimes be challenging to pay bills on time. When we approved your account for the Arrearage Management Plan (AMP) on 5/28/2025, you agreed to pay the full amount of each regular monthly bill on or before the due date.

As of 7/22/2025, we have not received full payment of your 6/20/2025 bill for $202.21. For your convenience, you may call us at **1-800-655-4555** to make your payment, or pay online at **sce.com/paybill.**

Your AMP Status Update

To date, you have paid 0 monthly bills on time. We have credited your past-due account balance a total of $0.00, and your past-due account balance is now $12,649.17. This balance will continue to earn the 1/12th adjustment amount each month your current bill is paid by the due date shown on the bill.

It Is Important to Pay on Time

To continue receiving debt forgiveness from the AMP program, it is important for you to make your payments on time. Your current payment status is:

- [x] You have missed or paid late one payment. If you miss or pay late two consecutive payments, we will remove your account from the program.
- [ ] You have missed or paid late two non-consecutive payments. If you miss or pay late a third payment, we will remove your account from the program.

If we remove your account from AMP, you will have to pay the remaining past-due balance in full to continue receiving SCE service. Any amount already credited will not be charged back.

If we remove your account from AMP and you would like to re-enroll, there is a 12-month waiting period, if you are eligible. We also have other payment options available to help you. Please visit **sce.com/billhelp** for more information.

You are a valued customer, and we look forward to receiving your payment so you can continue to benefit from AMP. If you have questions, or if you need help understanding your options and identifying any programs and/or resources that may help you get back on track with your payments, please call us at **1-800-655-4555**, Monday – Friday, 8 a.m.– 5 p.m., and a Customer Service representative will be glad to assist you. For more information, please visit sce.com/residential/assistance.

Sincerely,

Southern California Edison

* When removed from AMP, you may enroll again after a 12-month waiting period, assuming eligibility requirements are met. Should you leave AMP, you may be eligible for a 12-month payment plan for the remainder of your arrears.

SOUTHERN CALIFORNIA
EDISON
Energy for What's Ahead

August 27, 2025

IMPORTANT INFORMATION ABOUT YOUR ARREARAGE MANAGEMENT PLAN (AMP) PARTICIPATION

Delia Lovell
325 Emerald
Lake Arrowhead, CA 92352-9235

for Customer Account Number
700981814038

at Service Address
325 EMERALD DRIV

Dear Valued Customer,

On 5/22/2025, you applied for the Arrearage Management Plan (AMP) program* and agreed to pay your monthly bills on or before the due date. In return, we agreed to credit your AMP account 1/12th of the AMP account amount each time you paid your regular monthly bill on time.

Your enrollment status has changed.
Our records show you were unable to make two or more payments on time. Because of the missed payments, we have removed your account from the AMP program.

What happens next.
Your remaining AMP account balance is now due, in addition to any other past-due amounts. Please pay the remaining AMP account balance in full. There will be no impact to any credits already applied to the AMP account balance

If you would like to re-enroll in AMP and you are eligible, there is a 12-month waiting period; however, we have other payment options available to help you. Please visit **sce.com/billhelp** to learn about additional programs for which you may qualify.

We're here to help you. If you have questions, please call us at **1-800-655-4555**, Monday – Friday, 8 a.m. – 5 p.m., and a Customer Service representative will be glad to assist you.

Sincerely,

Southern California Edison

* The maximum eligible amount for AMP forgiveness per instance of customer enrollment is $8,000. Once you leave AMP, you may be eligible for a 12-month payment plan for the remainder of your arrears.

EXHIBIT 6

SCE's objection-only Responses to DR 1-02, 1-16,
1-18, 1-20, 1-21, 1-22, and 1-24
(no documents produced)

Attached to and incorporated in the Declaration of Delia Lovell in support of Complainant's Response in Opposition to SCE's Motion to Dismiss

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-02:
For each billing or service period within the Relevant Period for which no Itemized Bill was issued to Complainant on or near the ordinary billing date, identify the period and state in detail why no bill was issued and whether SCE treats that non-issuance as a billing error under Rule 17. (Rule 9; Rule 17.)

Response to Question DR1-02:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is unduly burdensome, vague and ambiguous, misstates facts, and calls for legal conclusion.

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-16:
Produce every disconnection notice issued to Complainant during the Relevant Period, including the notices SCE references from October, November, and December 2025, with proof of mailing or delivery and the amount stated on each. (D.20-06-003.)

Response to Question DR1-16:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is overly broad and unduly burdensome, vague and ambiguous and calls for legal conclusion.

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET Lovell-SCE-Discovery_001

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-18:
Identify each Communication, including the voicemail SCE references, that SCE contends satisfied its pre-disconnection notice obligations, and produce the recording, log, or record of each. (D.20-06-003.)

Response to Question DR1-18:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is unduly burdensome, vague and ambiguous, and calls for legal conclusion.

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-20:
Produce all credit applications, service-establishment records, and account-opening Documents associated with Complainant or the Service Property for the Relevant Period, including any that gave rise to the Origin Account.

Response to Question DR1-20:
SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is overly broad and unduly burdensome, and vague and ambiguous.

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-21:
Produce all Documents concerning Complainant's enrollment in, recertification for, and any removal from the California Alternate Rates for Energy (CARE) program, including every verification or recertification form SCE relies upon and each communication in which SCE addressed CARE eligibility.

Response to Question DR1-21:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence and is overly broad and unduly burdensome.

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-22:
Produce all call recordings, call logs, and account notes of SCE's Communications with Complainant during the Relevant Period, including the calls in which SCE representatives stated they could not access records prior to June 20, 2025.

Response to Question DR1-22:
SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is overly broad and unduly burdensome, and vague and ambiguous.

Southern California Edison
C.26-07-006 – Lovell vs SCE

DATA REQUEST SET L o v e l l - S C E - D i s c o v e r y _ 0 0 1

To: Lovell
Prepared by: Leticia Hernandez
Job Title: Manager
Received Date: 8/18/2026

Response Date: 8/24/2026

Question DR1-24:
State SCE's document-retention policy applicable to the records sought, and identify any responsive record that has been destroyed, purged, archived off-system, or is otherwise unavailable, with the date and reason for each. (§§ 451, 532.)

Response to Question DR1-24:

SCE objects to this request under Rule 10.1 of the Commission's Rules of Practice and Procedure to the extent it seeks production of information that is neither relevant to the subject matter involved in the pending proceeding nor is likely reasonably calculated to lead to the discovery of admissible evidence, is overly broad and unduly burdensome, vague and ambiguous, and calls for legal conclusion..