

PUBLIC UTILITIES COMMISSION

SAN FRANCISCO, CA 94102-3298



July 11, 2012

Advice Letter 2593-E

Akbar Jazayeri
Vice President, Regulatory Operations
Southern California Edison Company
P O Box 800
Rosemead, CA 91770

**Subject: Establishment of an Interim Interconnection Procedure for Rule 21
Qualifying Facilities Signing Power Purchase Agreements with SCE**

Dear Mr. Jazayeri:

Advice Letter 2593-E is withdrawn as requested in your letter dated May 18, 2012.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, Director
Energy Division

ADVICE LETTER (AL) SUSPENSION NOTICE
ENERGY DIVISION

Utility Name: SCE
Utility No./Type: U 338-E

Date Utility Notified: July 20, 2011
 E-Mail to: AdviceTariffManager@sce.com,
Karyn.Gansecki@sce.com

Advice Letter No.: 2593-E
Date AL filed: June 17, 2011
Utility Contact Person: Akbar Jazayeri
Utility Phone No.: (626) 302-2930

Fax No.: (626) 302-4829
ED Staff Contact: Rachel Peterson

For Internal Purposes Only:

Date Calendar Clerk Notified ____/____/____

Date Commissioners/Advisors Notified __/__/__

INITIAL SUSPENSION (up to 120 DAYS from the expiration of the initial review period)

This is to notify that the above-indicated Advice Letter is suspended for up to 120 days beginning July 20, 2011 for the following reason(s) below. If the Advice Letter requires a Commission resolution and the Commission's deliberation on the resolution prepared by Energy Division extends beyond the expiration of the initial suspension period, the Advice Letter will be automatically suspended for up to 180 days beyond the initial suspension period.

A Commission Resolution is Required to Dispose of the Advice Letter

Advice Letter Requests a Commission Order

Advice Letter Requires Staff Review

The expected duration of initial suspension period is 120 days

FURTHER SUSPENSION (up to 180 DAYS beyond initial suspension period)

The Advice Letter requires a Commission resolution and the Commission's deliberation on the resolution prepared by Energy Division has extended beyond the expiration of the initial suspension period. The Advice Letter is suspended for up to 180 days beyond the initial suspension period.

If you have any questions regarding this matter, please contact Rachel Peterson at rpl@cpuc.ca.gov.

cc: Maria Salinas
Honesto Gatchalian

June 17, 2011

ADVICE 2593-E
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Establishment of an Interim Interconnection Procedure for
Rule 21 Qualifying Facilities Signing Power Purchase
Agreements With SCE

Southern California Edison Company (SCE) hereby submits for filing the following changes to its Electric Tariff Rule 21. The revised tariff sheets are listed on Attachment A and are attached hereto.

PURPOSE AND REQUEST FOR AUTHORIZATION

The purpose of this Advice Letter is to establish an interim interconnection procedure that will allow SCE to use the California Independent System Operator (CAISO) Tariff or Wholesale Distribution Access Tariff (WDAT) for Rule 21 applicants that have contracted to sell or intend to sell to SCE all exports to the grid and to insert language in SCE's Rule 21 reflecting this procedure.

As recognized in the Rule 21 Working Group meeting on April 29, 2011, reforms to Rule 21 are necessary to meet the technical needs and policy goals of interconnecting distributed generation units. While SCE plans to participate fully in the Rule 21 Working Group to achieve lasting interconnection reform, SCE requests authorization for the interim changes described herein to adequately and immediately address the influx of interconnection applications resulting from the Qualifying Facility and Combined Heat and Power (QF/CHP) Settlement approved in Decision (D.)10-12-035, the Assembly Bill (AB) 1613 Program,¹ and the continued growth in the California Renewable Energy Small Tariff (CREST) Program. SCE's proposal is not intended to call into question the California Public Utilities Commission's (Commission's) jurisdiction over QF interconnections, but rather is to allow the interconnection process to proceed efficiently

¹ Advice 2485-E-A, Establishment of Tariff for Purchase of Excess Electricity from Eligible Combined Heat and Power (CHP) systems, was submitted to the Commission on January 31, 2011.

for new QF procurement programs and the CREST Program. For these reasons and those summarized below, SCE requests that the Commission exercise its jurisdiction and require that specified new interconnections use the existing CAISO and WDAT interconnection procedures on an interim basis.

BACKGROUND AND CURRENT LIMITATIONS OF RULE 21

In response to the passage of the Public Utility Regulatory Policies Act of 1978 (PURPA), the Commission initiated a proceeding to establish rules regarding utility purchase of electricity from QFs under PURPA. As a result, Rule 21 was established. Since that time, there have been a number of important changes in generating facility interconnection and grid management that have not been reflected in Rule 21.

First, significant market changes have occurred as a result of the CAISO assuming operational control of the California grid and responsibility for generator interconnections to the transmission system. The CAISO and the investor-owned utilities (IOUs) have implemented, and the Federal Energy Regulatory Commission (FERC) has approved, a number of new procedures for the management and coordination of the interconnection queues at both transmission and distribution levels. Rule 21 does not appropriately distinguish between the transmission and distribution system. SCE expects that some QFs will interconnect at the transmission level, and clear rules for such interconnections do not exist.

Second, the CAISO procedures address certification for Resource Adequacy credit for eligible QFs. Rule 21 has no provisions to enable eligible QFs to obtain the CAISO Deliverability Studies that are essential to the QFs' ability to provide Resource Adequacy to SCE.

Third, the Rule 21 tariff lacks Commission-approved interconnection and study agreements for the interconnection of QFs making sales to SCE. The tariff also lacks detailed information on how studies will be performed and how the queue for Rule 21 interconnection applicants will be managed with the other interconnection queues maintained by SCE. When the Commission implemented the CREST Program, SCE began developing a process to provide for the study and interconnection of CREST applicants. However, this process was modeled on the then-existing WDAT process that utilized a serial study method, which experience has shown results in long delays, the need for frequent restudy when earlier-queued generators withdraw, and inequitable cost allocation. Not only is the process inadequate to handle the volume of generators seeking interconnection, it ignores the electrical interdependency that exists among generators. Following recent reforms of the CAISO and WDAT tariffs, generators are now either evaluated in a fast track process or studied in an independent study or

cluster study process. This creates a problematic mismatch between the study methods used in the CAISO, WDAT and Rule 21 tariffs.²

PROPOSED INTERIM PROCESS

To address the changes described above, including the advent of the CAISO, the existence of multiple interconnection queues, and interconnection applicants at both transmission and distribution levels, Rule 21 will need to be significantly amended. Because such reform will not occur immediately, SCE requests Commission approval to use the FERC-approved CAISO and WDAT interconnection rules, procedures, and forms on an interim basis.

Interim approval would allow interconnections to proceed while stakeholders conduct a more thorough review of long-term options and revisions to Rule 21. SCE is optimistic that long-term solutions regarding interconnections will result from the Rule 21 Working Group, but the future structure, timing and priorities of the Working Group are still being determined. Approving an interim process would allow the Commission the time to investigate the best interconnection procedures, either through an updated Rule 21, continued use of the WDAT and CAISO processes, or a hybrid approach.

Interim use of the FERC-approved CAISO and WDAT interconnection procedures has several advantages. The CAISO and WDAT procedures are well-established, are familiar to many applicants, have been vetted by stakeholders including the generation community, and most importantly, will ensure a level of consistency between the interconnection procedures for QFs and other wholesale generators. Using WDAT should also satisfy participants at the Rule 21 Workshop calling for greater transparency in the queue process because the WDAT interconnection queue is published on the internet and updated regularly.

Granting interim approval will not result in any major policy changes. In fact, in Resolution E-4299 (Jan 21, 2010) implementing SCE's Solar Photovoltaic Program, the Commission has already considered and approved use of the WDAT procedures on an interim basis:

[T]here is nothing precluding our reliance on the WDAT at this time, and the WDAT, or some permutation of it, could prove to be a useful construct for facilitating the interconnection of these IPP Program projects to SCE's distribution network.

Similarly, in its Order Instituting Rulemaking to Continue Implementation and Administration of California Renewables Portfolio Standard Program, the Commission

² To understand this issue, consider that Rule 21 generators may well be connecting to the very same areas as generators connecting under the WDAT or CAISO tariff. In such a situation, the two groups should be studied together to understand their combined impact on the system and on each other. Absent this, Rule 21 studies may be delayed awaiting the results of the current cluster study. This problem will be exacerbated as the number and size of Rule 21 applicants increase.

ruled that “Respondents shall follow their FERC-approved SGIP [small generator interconnection procedure], or Commission-approved Rule 21, as appropriate and applicable for each particular situation regarding an interconnection agreement.” D.07-07-027 (July 26, 2007).

For these reasons, SCE requests Commission approval to allow SCE to use the CAISO and WDAT procedures, rules and applications for an interim period. Accordingly, this Advice Letter modifies SCE’s Electric Rule 21 by including language directing applicants to use the applicable currently effective CAISO or WDAT interconnection procedures for new applications. This Advice Letter does not affect any generator that has submitted an application under Rule 21 prior to the effective date of this Advice Letter.

PROPOSED TARIFF CHANGES

SCE proposes to add the following language to Rule 21 Section A, *Applicability*, authorizing the use of the CAISO and WDAT Generation Interconnection Procedures, rules and applications on an interim basis:

For an interim period until otherwise ordered by the Commission, the Commission directs SCE to use the currently effective interconnection procedure contained in the California Independent System Operator (CAISO) Tariff or SCE’s Wholesale Distribution Access Tariff (WDAT) for applicants for the interconnection of a Generating Facility that has contracted to sell or intends to sell all its exports to the grid to SCE under (1) a Public Utility Regulatory Policies Act (PURPA) power purchase agreement, (2) the California Renewable Energy Small Tariff (CREST), or (3) other procurement programs that allow applicants to interconnect under this Rule. A net energy metering (NEM) customer’s generating facility is exempt from this provision and may be interconnected pursuant to the other provisions of this Rule.

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.3, this Advice Letter is submitted with a Tier 3 designation.

EFFECTIVE DATE

This Advice Letter will become effective upon Commission adoption of a resolution approving the Advice Letter.

NOTICE

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be mailed to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: inj@cpuc.ca.gov and mas@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this Advice Letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Akbar Jazayeri
Vice President of Regulatory Operations
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Bruce Foster
Senior Vice President, Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5540
E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

In accordance with Section 4 of GO 96-B, SCE is serving copies of this advice filing to the interested parties shown on the attached GO 96-B, R.08-06-024, and R.11-05-005 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-2930. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice filing at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at <http://www.sce.com/AboutSCE/Regulatory/adviceletters>.

For questions, please contact Cindy Jacobs at (626) 302-4316 or by electronic mail at Cindy.Jacobs@sce.com.

Southern California Edison Company

Akbar Jazayeri

AJ:cj:sq
Enclosures

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: James Yee

Phone #: (626) 302-2509

E-mail: James.Yee@sce.com

E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
 PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2593-E Tier Designation: 3

Subject of AL: Establishment of an Interim Interconnection Procedure for Rule 21 Qualifying Facilities Signing Power Purchase Agreements With SCE

Keywords (choose from CPUC listing): Rules, Qualifying Facility

AL filing type: Monthly Quarterly Annual One-Time Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: _____

Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement.

Name and contact information to request nondisclosure agreement/access to confidential information:

Resolution Required? Yes No

Requested effective date: upon approval by a resolution No. of tariff sheets: -4-

Estimated system annual revenue effect: (%): _____

Estimated system average rate effect (%): _____

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: Rule 21 and Table of Contents

Service affected and changes proposed¹: _____

Pending advice letters that revise the same tariff sheets: _____

¹ Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave.,
San Francisco, CA 94102
inj@cpuc.ca.gov and mas@cpuc.ca.gov

Akbar Jazayeri
Vice President of Regulatory Operations
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Bruce Foster
Senior Vice President, Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5540
E-mail: Karyn.Gansecki@sce.com

| Cal. P.U.C. Sheet No. | Title of Sheet | Cancelling Cal. P.U.C. Sheet No. |
|------------------------------------|--|---|
| Revised 48680-E Revised 48681-E | Rule 21 Rule 21 | Revised 36865-E** Revised 36865-E** Revised 36866-E |
| Revised 48682-E Revised 48693-E | Table of Contents Table of Contents | Revised 48545-E Revised 47777-E |



Rule 21
GENERATING FACILITY INTERCONNECTIONS

Sheet 2

(Continued)

B. General, Rules, Rights and Obligations (Continued)

those rights.

- 4. Compliance with Laws, Rules, and Tariff Schedules: A Producer shall ascertain and comply with applicable Commission-approved tariffs of SCE; applicable Federal Energy Regulatory Commission (FERC) approved rules, tariffs, and regulations; and any local, state or federal law, statute or regulation which applies to the design, siting, construction, installation, operation, or any other aspect of the Producer's Generating Facility and Interconnection Facilities.
- 5. Design Reviews and Inspections: SCE shall have the right to review the design of a Producer's Generating and Interconnection Facilities and to inspect a Producer's Generating and/or Interconnection Facilities prior to the commencement of Parallel Operation with SCE's Distribution System. SCE may require a Producer to make modifications as necessary to comply with the requirements of this Rule. SCE's review and authorization for Parallel Operation shall not be construed as confirming or endorsing the Producer's design or as warranting the Generating and/or Interconnection Facilities safety, durability or reliability. SCE shall not, by reason of such review or lack of review, be responsible for the strength, adequacy, or capacity of such equipment.
- 6. Right to Access: A Producer's Generating Facility and/or Interconnection Facilities shall be reasonably accessible to SCE personnel as necessary for SCE to perform its duties and exercise its rights under its tariffs approved by the Commission, and any Interconnection Agreement between SCE and the Producer.
- 7. Confidentiality of Information: Any information pertaining to Generating and/or Interconnection Facilities provided to SCE by a Producer shall be treated by SCE in a confidential manner. SCE shall not use information contained in the Application to propose discounted tariffs to the Customer unless authorized to do so by the Customer or the information is provided to SCE by the Customer through other means.
- 8. Prudent Operation and Maintenance Required: A Producer shall operate and maintain its Generating Facility and Interconnection Facilities in accordance with Prudent Electrical Practices and shall maintain compliance with this Rule.
- 9. Curtailment and Disconnection: SCE may limit the operation or disconnect or require the disconnection of a Producer's Generating Facility from SCE's Distribution System at any time, with or without notice, in the event of an Emergency, or to correct Unsafe Operating Conditions. SCE may also limit the operation or disconnect or require the disconnection of a Producer's Generating Facility from SCE's Distribution System upon the provision of reasonable written notice: 1) to allow for routine maintenance, repairs or modifications to SCE's Distribution System; 2) upon SCE's determination that a Producer's Generating Facility is not in compliance with this Rule; or 3) upon termination of the Interconnection Agreement. Upon the Producer's written request, SCE shall provide a written explanation of the reason for such curtailment or disconnection.

(L)

(L)

(Continued)

(To be inserted by utility)

Advice 2593-E
Decision _____

Issued by
Akbar Jazayeri
Vice President

(To be inserted by Cal. PUC)

Date Filed Jun 17, 2011
Effective _____
Resolution _____



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(To be inserted by utility)
 Advice 2593-E
 Decision _____

Issued by
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Vice President

(To be inserted by Cal. PUC)
 Date Filed Jun 17, 2011
 Effective _____
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(Continued)

(To be inserted by utility)

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Decision _____

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(To be inserted by Cal. PUC)

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