

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 30, 2017

**Advice Letter 3258-E-A**

Russell G. Worden  
Director, State Regulatory Operations  
Southern California Edison Company  
8631 Rush Street  
Rosemead, CA 91770

**SUBJECT: Tariff Modifications for On-Bill Repayment Financing Pilots in  
Compliance with D.15-06-008, O.P. 4 and 6**

Dear Mr. Worden:

Advice Letter 3258-E-A is withdrawn per SCE withdrawal letter dated January 12, 2016.

Sincerely,

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

Edward Randolph  
Director, Energy Division

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January 8, 2016

**ADVICE 3258-E-A**  
**(U 338-E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

**SUBJECT:** Supplemental to Advice 3258-E, Tariff Modifications for On-Bill  
Repayment Financing Pilots in Compliance with Decision  
15-06-008, Ordering Paragraphs 4 and 6

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

**PURPOSE**

The purpose of this advice filing is to submit a modified version of Form 14-964, *Energy Efficiency Financing Pilots Program Authorization or Revocation of Authorization to Release Customer Usage Information* (Form 14-964). SCE filed Advice 205-G/3258-E on August 12, 2015, yet is only supplementing the electric advice letter, Advice 3258-E to provide revisions to electric Form 14-964 in response to the request of the Energy Division. SCE is modifying Form 14-964 to simplify the formatting, reduce administrative complexity, and make the form more consistent with similar forms used by the other California investor-owned utilities (IOUs).<sup>1</sup>

These changes are made in accordance with General Order (GO) 96-B, General Rules 7.5.1, which authorizes utilities to make additional changes to an advice filing through the filing of a supplemental advice letter.

This advice filing supplements in part and does not change the substance of the original Advice 205-G/3258-E.

**BACKGROUND**

On May 28, 2015, SCE filed Advice 202-G/3224-E to request approval to establish Form 14-964. Form 14-964 is used with SCE's Energy Efficiency (EE) Financing Pilot

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<sup>1</sup> The Investor Owned Utilities consist of SCE, Southern California Gas Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company.

Programs (Pilots) to enable energy usage data transfer requirements pursuant to Decision (D.)13-09-044<sup>2</sup> and improves the ability of the California Hub for Energy Efficiency Financing (CHEEF) to share energy usage data between the IOUs, CAEATFA, CAEATFA's agents, and participating lenders. The Commission approved Advice 202-G/3224-E on July 14, 2015.

On December 7, 2015, on behalf of CAEATFA, the Energy Division notified the IOUs regarding the need to modify each form established under the advice filings in May 2015. SCE's Form 14-964 was developed specifically to meet the needs of the Pilots and is consistent with the forms used by the other IOUs. CAEATFA's intention is to simplify the data capture process for the Master Servicer (Concord Servicing) who has the responsibility to review and validate the forms. Although the form may vary slightly for each IOU, the format is as consistent as possible.

### **PROPOSED TARIFF CHANGES**

Form 14-964 is modified herein and is replacing in its entirety the form established under Advice 202-G/3224-E. The new version of the form simplifies the data capture process for the Master Servicer.

No cost information is required for this advice filing.

Except as noted above, this filing will not increase any rate or charge, conflict with any other schedule or rule, or cause the withdrawal of service.

### **TIER DESIGNATION**

Pursuant to GO 96-B, Energy Industry Rule 5.2, this advice letter is submitted with a Tier 2 designation, which is the same Tier designation as the original filing, Advice 205-G/3258-E.

### **EFFECTIVE DATE**

This supplemental advice filing will become effective on the same day as the original filing, Advice 205-G/3258-E, which is September 11, 2015.

### **PROTESTS**

SCE asks that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice 205-G/3258-E and not reopen the protest period. The modifications included in this supplemental advice filing do not make substantive changes that would affect the overall evaluation of the filing.

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<sup>2</sup> D.13-09-044, p. 65-66.

**NOTICE**

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, A.12-07-001 et al, and R.13-11-005 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com) or at (626) 302-4039. 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](mailto: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 <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Joni Key at (626) 302-5394 or by electronic mail at [Joni.Key@sce.com](mailto:Joni.Key@sce.com).

**Southern California Edison Company**

/s/ Russell G. Worden  
Russell G. Worden

RGW:jk;jm  
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: Darrah Morgan

Phone #: (626) 302-2086

E-mail: [Darrah.Morgan@sce.com](mailto:Darrah.Morgan@sce.com)

E-mail Disposition Notice to: [AdviceTariffManager@sce.com](mailto: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) #: 3258-E-A

Tier Designation: 2

Subject of AL: Supplemental to Advice 3258-E, Tariff Modifications for On-Bill Repayment Financing Pilots in Compliance With Decision 15-06-008, Ordering Paragraphs 4 and 6

Keywords (choose from CPUC listing): Compliance, Forms

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

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

Decision 15-06-008

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 AL<sup>1</sup>: \_\_\_\_\_

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: 9/11/15

No. of tariff sheets: -3-

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: See Attachment A

Service affected and changes proposed<sup>1</sup>: \_\_\_\_\_

Pending advice letters that revise the same tariff sheets: 3258-E

<sup>1</sup> Discuss in AL if more space is needed.

**All other correspondence regarding this AL, unless otherwise authorized by the Commission, shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Ave.,  
San Francisco, CA 94102  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Russell G. Worden  
Managing Director, State Regulatory Operations  
Southern California Edison Company  
8631 Rush Street  
Rosemead, California 91770  
Facsimile: (626) 302-4829  
E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

Michael R. Hoover  
Director, State 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](mailto:Karyn.Gansecki@sce.com)

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 58445-E	Form 14-964	Original 56930-E
Revised 58456-E	Table of Contents	Revised 58421-E
Revised 58457-E	Table of Contents	Revised 58044-E



Southern California Edison  
Rosemead, California (U 338-E)

Revised Cal. PUC Sheet No. 58445-E  
Cancelling Original Cal. PUC Sheet No. 56930-E

Sheet 1

ENERGY EFFICIENCY FINANCING PILOT PROGRAMS AUTHORIZATION OR  
REVOCATION OF AUTHORIZATION TO RELEASE CUSTOMER USAGE  
INFORMATION

Form-14-964

(To be inserted by utility)

Advice 3258-E-A  
Decision 15-06-008

Issued by  
R.O. Nichols  
Senior Vice President

(To be inserted by Cal. PUC)

Date Filed Jan 8, 2016  
Effective Jan 12, 2016  
Resolution \_\_\_\_\_



## ENERGY EFFICIENCY FINANCING PILOT PROGRAMS AUTHORIZATION OR REVOCATION OF AUTHORIZATION TO RELEASE CUSTOMER USAGE INFORMATION

### Introduction & Definitions Section

(N)

**This Authorization or Revocation of Authorization to Release Customer Usage Information (“Authorization”): (1) authorizes Southern California Edison Company (SCE) to release your energy usage data to the Master Servicer, which will release such data to the Data Manager and Contractor Manager, all in accordance with the rules of, and as a condition of your participation in SCE’s Energy Efficiency Financing Pilot Programs (“Programs”), as administered by CAEATFA, or (2) revokes an existing Authorization.**

**If you do not wish to share your energy usage data as described herein, you are not required to fill out this Authorization, but you will be unable to participate in the Programs.**

**You may also revoke your authorization at any time after signing this Authorization, but such revocation may lead to the termination of your participation in the Programs and may breach the terms and conditions of your loan or lease agreement with your lender.**

#### **Definitions:**

“CAEATFA”: The California Alternative Energy and Advanced Transportation Financing Authority, a public instrumentality of the State of California, or its agents, that administer the Programs for the California investor-owned utilities, or any successor administrator approved by the California Public Utilities Commission (CPUC).

“Contractor Manager”: An entity hired by and under contract with CAEATFA to manage qualified contractor activity under the Programs. The Contractor Manager will perform quality assurance procedures for which it may require the customer contact information and the installed project information. The Contractor Manager’s contract with CAEATFA will require the Contractor Manager to protect the confidentiality of your contact and project information and prevent unauthorized contact and project information from being released to any other entity. CAEATFA may assume the obligations of the Contractor Manager.

“Data Manager”: An entity hired by and under contract with CAEATFA solely to collect statewide energy usage data and data regarding the financial products provided to customers participating in the Programs and build a database for the aggregated and anonymized data provided by the Master Servicer. The Data Manager’s contract with CAEATFA will require the Data Manager to protect the confidentiality of your usage data and prevent unauthorized disclosure of your usage data to any other entity. CAEATFA may assume the obligations of the Data Manager.

“Master Servicer”: An entity hired by and under contract with CAEATFA. The Master Servicer will use customer energy usage data solely to: (1) establish a master file including project and financial product data for each loan and lease enrolled in the Programs; and (2) develop and update financial product servicing data files to be maintained throughout the term during which the loans and leases are enrolled in the Programs. The Master Servicer’s contract with CAEATFA requires the Master Servicer to protect the confidentiality of your usage data and prevent unauthorized disclosure of your usage data to any other entity. The Master Servicer will aggregate and anonymize the data for the purpose of evaluating the Programs. CAEATFA may assume the obligations of the Master Servicer.

(D)

**Please select the action you wish to take:**

- [ ] CREATE A NEW AUTHORIZATION – Please Complete SECTION A - 1, 2, and 3 (T)
- [ ] REVOKE AN EXISTING AUTHORIZATION – Please Complete SECTION B (skip to page 5) (T)

**SECTION A: CREATE A NEW AUTHORIZATION – Must be completed by Account Holder (T)**

**1. Contact Information**

- (A) First Name \_\_\_\_\_ (T)
- (B) Last Name \_\_\_\_\_ (T)
- (C) Business Name (if applicable or enter N/A) \_\_\_\_\_ (T)
- (D) Title of Signer (if applicable) \_\_\_\_\_ (T)
- (E) Mailing Address \_\_\_\_\_ (T)
- (F) Phone Number \_\_\_\_\_ (T)
- (G) Email Address \_\_\_\_\_ (T)

*(The email address you provide here will be used for all transactional emails relating to this Authorization. If you don't have an email address, please indicate N/A))* (T)

**2. Authorization Period** (T)

This Authorization is effective upon your execution and authorizes SCE to release and provide ongoing access to your monthly energy usage data to the Master Servicer (which will release such data to the Data Manager and Contractor Manager in accordance with the rules of the Programs) for the period commencing on the date that is twelve (12) months before the date that you sign this Authorization and ending on (j) \_\_\_\_\_ [Please check with your lender to confirm the end of your loan or lease term]. (T)

**TO CREATE A NEW AUTHORIZATION** (T)

(P) I, \_\_\_\_\_ [print name of authorized signatory], authorize SCE to provide the Master Servicer access to the energy usage data from the designated service accounts in accordance with these terms and conditions. I understand that, pursuant to such authorization and in accordance with the rules of the Programs, the Master Servicer will release such energy usage data to the Data Manager and the Contractor Manager.

By signing below, I declare under penalty of perjury under the laws of the State of California that I am authorized to execute this document on behalf of the Customer and that I have authority to financially bind the Customer. I understand SCE reserves the right to verify any authorization request submitted before releasing information or taking any action on my behalf. [This Authorization must be signed by someone who has authority to financially bind the customer (for example, CFO of a company or City Manager of a municipality)]. (N)

\_\_\_\_\_  
(Q) AUTHORIZED CUSTOMER SIGNATURE (R) SIGNATURE DATE (N)

3. Service and Customer Account Numbers to be Authorized

(T)

**Residential/Multifamily Accounts**

Please specify the Service Address, Service Account Number, and Customer Account Number for which you are authorizing the Master Servicer, Data Manager and Contractor Manager to access your energy usage data. (The Service Account Number is 10 digits long and begins with the number 3; the Customer Account Number is 10 digits long and begins with the number 2. Both can be found on the top right hand corner on page 1 of your bill).

(L1) Service Address \_\_\_\_\_  
(M1) Service Account 3- \_\_\_\_\_  
(N1) Customer Account 2- \_\_\_\_\_

(T)

**Commercial (Non-Residential) Accounts**

Please list all Service Addresses where you had Energy Efficiency work done as part of your financing agreement. Include all Service Account and Customer Account Numbers for those addresses for which you are authorizing the Master Servicer, Data Manager and Contractor Manager to access your energy usage data. For more than 3 service addresses, please use an additional form. (The Service Account Number is 10 digits long and begins with the number 3; the Customer Account Number is 10 digits long and begins with the number 2. Both can be found on the top right hand corner on page 1 of your bill).

(L1) **Service Address#1** \_\_\_\_\_  
(M1) Service Account 3- \_\_\_\_\_  
(N1) Customer Account 2- \_\_\_\_\_

(L2) **Service Address#2** \_\_\_\_\_  
(M2) Service Account 3- \_\_\_\_\_  
(N2) Customer Account 2- \_\_\_\_\_

(L3) **Service Address#3** \_\_\_\_\_  
(M3) Service Account 3- \_\_\_\_\_  
(N3) Customer Account 2- \_\_\_\_\_

(T)

#### 4. AGREE TO TERMS & CONDITIONS

(T)

**Important information: Please read carefully. This is a legally binding agreement.**

**By signing this Authorization, you are authorizing the Master Servicer, Data Manager and Contractor Manager for the Programs to have access to your SCE energy usage data, consisting of your electricity and natural gas usage data, for the property(ies) where you have installed eligible Program measures. Your SCE energy usage data is independent from any information that a bank or other lender may require you to provide as a condition of your participation in the Programs.**

(T)

Once you authorize the release of your energy usage data to the Master Servicer, the Data Manager and the Contractor Manager; these entities and not SCE or your lender, are responsible for ensuring the safety and security of your information.

By signing above you attest that you have read, understood, agree and authorize SCE to release the requested information on your account(s) to the Master Servicer (which will release such data to the Data Manager and the Contractor Manager in accordance with the rules of the Programs), and you hereby release, hold harmless and indemnify SCE from any liability, claims, demands, causes of action, damages or expenses arising out of or in connection with:

(T)

1. Any release of information to the Master Servicer and/or the Data Manager and/or Contractor Manager pursuant to this Authorization;
2. The unauthorized use of this information by the Master Servicer and/or the Data Manager and/or the Contractor Manager; and/or
3. Any actions taken by the Master Servicer and/or the Data Manager and/or the Contractor Manager pursuant to their receipt of your energy usage data.

You also understand and acknowledge that you may revoke this Authorization at any time by completing and submitting to SCE Section B of this Authorization or via email if you have provided an email address. Your participation in the Programs may be terminated if you revoke this Authorization during your participation in the Programs, and such revocation may breach the terms and conditions of your loan or lease agreement with your lender.

Finally, you consent to receive transactional emails regarding this Authorization.

#### **Instructions to submit a new authorization**

**Instructions for lenders** – Please include an executed Authorization with your loan enrollment or project pre-approval request to CAEATFA per Program instructions. Additional information can be found on CAEATFA's website: [www.treasurer.ca.gov/CAEATFA/cheef](http://www.treasurer.ca.gov/CAEATFA/cheef).

**SECTION B: REVOKE AN EXISTING AUTHORIZATION**

**5 Service and Customer Account Numbers to be Revoked**

(T)

I, \_\_\_\_\_ [print name of authorized signatory], instruct SCE to cease to provide the Master Servicer access to the energy usage data from the designated service accounts in accordance with these terms and conditions.

By signing below, I declare under penalty of perjury under the laws of the State of California that I am authorized to execute this document on behalf of the Customer and that I have authority to financially bind the Customer. I understand SCE reserves the right, but is not obligated, to verify any revocation of authorization request submitted before releasing information or taking any action on my behalf. [This Authorization must be signed by someone who has authority to financially bind the customer (for example, CFO of a company or City Manager of a municipality).].

**Residential/Multifamily Accounts**

Please specify the Service Address, Service Account Number, and Customer Account Number for which you are revoking authorization for the Master Servicer, Data Manager and Contractor Manager to access your energy usage data. (The Service Account Number is 10 digits long and begins with the number 3; the Customer Account Number is 10 digits long and begins with the number 2. Both can be found on the top right hand corner on page 1 of your bill).

(L) Service Address \_\_\_\_\_  
(M1) Service Account 3- \_\_\_\_\_  
(N1) Customer Account 2- \_\_\_\_\_

**Commercial (Non-Residential) Accounts**

Include all Service Account and Customer Account Numbers for those addresses for which you are revoking authorization for the Master Servicer, Data Manager and Contractor Manager to access your energy usage data. For more than 3 service addresses, please use an additional form. (The Service Account Number is 10 digits long and begins with the number 3; the Customer Account Number is 10 digits long and begins with the number 2. Both can be found on the top right hand corner on page 1 of your bill).

(L1) Service Address#1 \_\_\_\_\_  
(M1) Service Account 3- \_\_\_\_\_  
(N1) Customer Account 2- \_\_\_\_\_

(L2) Service Address#2 \_\_\_\_\_  
(M2) Service Account 3- \_\_\_\_\_  
(N2) Customer Account 2- \_\_\_\_\_

(L3) Service Address#3 \_\_\_\_\_  
(M3) Service Account 3- \_\_\_\_\_  
(N3) Customer Account 2- \_\_\_\_\_

\_\_\_\_\_  
AUTHORIZED CUSTOMER

\_\_\_\_\_  
SIGNATURE DATE

(T)

(T)

(N)

(D)

Instructions for customers to revoke an existing Authorization – Please send the executed Authorization by email to [3RDPARTY@sce.com](mailto:3RDPARTY@sce.com), or by mail to:

Southern California Edison  
3rd Party Authorizations  
P.O. Box 800  
Rosemead, CA 91770

(T)  
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(T)



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(To be inserted by utility)  
Advice 3258-E-A  
Decision 15-06-008

Issued by  
R.O. Nichols  
Senior Vice President

(To be inserted by Cal. PUC)  
Date Filed Jan 8, 2016  
Effective Jan 12, 2016  
Resolution \_\_\_\_\_



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Sheet 12

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(Continued)

(To be inserted by utility)  
 Advice 3258-E-A  
 Decision 15-06-008

Issued by  
R.O. Nichols  
 Senior Vice President

(To be inserted by Cal. PUC)  
 Date Filed Jan 8, 2016  
 Effective Jan 12, 2016  
 Resolution \_\_\_\_\_