

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 8, 2019

Advice Letter 3910-E

Gary A. Stern
Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, CA 91770

SUBJECT: Modification to Southern California Edison Company's Preliminary Statement Part YY, Base Revenue Requirement Balancing Account, to Recover Audit Costs Consistent with Order Instituting Rulemaking 17-05-010

Dear Mr. Stern:

Advice Letter 3910-E is withdrawn as requested per your letter dated April 3, 2019.

Sincerely,

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

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

April 3, 2019

**ADVICE 3910-E
(U 338-E)**

Energy Division
Attn: Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Re: Withdrawal of Southern California Edison Company's Advice 3910-E

Dear Energy Division Tariff Unit:

Pursuant to conversations with Energy Division staff, Southern California Edison Company (SCE) is requesting the withdrawal of Advice 3910-E, Modification to SCE's Preliminary Statement Part YY, Base Revenue Requirement Balancing Account, to Recover Audit Costs Consistent With Order Instituting Rulemaking 17-05-010.¹

SCE submits this request for withdrawal in accordance with General Order (GO) 96-B, General Rule 5.3. SCE asks that a confirmation letter be returned regarding this withdrawal.

Should you have any questions, please contact me.

Sincerely,

/s/ Gary A. Stern
Gary A. Stern, Ph.D.

GAS:kb:cm

Copy: Edward Randolph, Director, CPUC Energy Division
Franz Cheng, CPUC Energy Division
Michael Zelazo, CPUC Energy Division
Service Lists GO 96-B and R.17-05-010

¹ Advice 3910-E was submitted on December 7, 2018.

December 7, 2018

**ADVICE 3910-E
(U 338-E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Modification to Southern California Edison Company's Preliminary Statement Part YY, Base Revenue Requirement Balancing Account, to Recover Audit Costs Consistent With Order Instituting Rulemaking 17-05-010

Southern California Edison Company (SCE) hereby submits for approval by the California Public Utilities Commission (Commission) the following changes to its tariffs. The revised tariffs are listed on Attachment A and are attached hereto.

PURPOSE

This advice letter modifies SCE's existing Preliminary Statement Part YY, Base Revenue Requirement Balancing Account (BRRBA), to allow for the recovery of Order Instituting Rulemaking 17-05-010 Rule 20 independent audit costs.

BACKGROUND

On May 19, 2017, the Commission issued Order Instituting Rulemaking 17-05-010 to revise or modify Electric Tariff Rule 20 based on the Commission's assessment of which option is most likely to enhance the fair, efficient allocation of customer funds to communities for the undergrounding of electric infrastructure in specified locations and circumstances. Pursuant to Rulemaking 17-05-010 each Investor Owned Utilities (IOU's) shall file and serve a programmatic and financial audit of its administration of its Rule 20A program, conducted by an independent firm in consultation with the Commission's Utility Audit Finance & Compliance Branch and Energy Division. The audit will review compliance with the Commission's prior decisions, as well as review for the proper financial oversight of the use of Rule 20A ratepayer funds. In this advice letter, SCE requests authorization to recover its actual Rule 20A independent audit expenses into the distribution subaccount of the BRRBA.

PROPOSED TARIFF CHANGES

As discussed above, and consistent with Rulemaking 17-05-010, SCE herein modifies Preliminary Statement Part YY, BRRBA, to record the independent audit firm

expenses associated with Rule 20 independent audits into the distribution subaccount of the BRRBA.

The recorded operation of the BRRBA, which will include the independent audit firm expenses, is reviewed annually by the Commission in SCE's Energy Resource Recovery Account (ERRA) Review proceeding to ensure that the entries made in the BRRBA are stated correctly and are consistent with Commission decisions.

No cost information is required for this advice letter.

This advice letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2, this Advice Letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

SCE requests that this advice letter become effective January 6, 2019, which is 30 days from the date submitted.

NOTICE

Anyone wishing to protest this advice letter 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 letter. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102
Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests should also be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-9645
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Laura Genao
Managing Director, State Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of General Order (GO) 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B and R.17-05-010 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) 302-4039. For changes to all other service lists, please contact the CPUC'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 submitting and keeping the advice letter at SCE's corporate headquarters. To view other SCE advice letters submitted with the CPUC, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Kimwuana Blebu at (626) 302-2403 or by electronic mail at Kimwuana.Blebu@sce.com.

Southern California Edison Company

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.

GAS:kb:jm
Enclosures



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted 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 AL:

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:

No. of tariff sheets:

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:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss 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 submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 65215-E	Preliminary Statement Part YY	Revised 64191-E
Revised 65216-E	Table of Contents	Revised 65099-E
Revised 65217-E	Table of Contents	Revised 64439-E

PRELIMINARY STATEMENT

Sheet 11

(Continued)

YY. Base Revenue Requirement Balancing Account (BRRBA) (Continued)

4. Distribution Sub-account: (Continued)

- (18) Debit entry to record SCE's share of 21st Century Energy Systems cyber security research project (CES-21) expenses, not to exceed \$14.350 million including (FF & U) over a five-year period.
- (19) Debit entry to record Customer Data Privacy and Security Practices independent audit costs.
- (20) Debit entry to record Safety and Reliability Investment Incentive Mechanism (SRIIM) independent audit costs.
- (21) Credit entry to record fees paid by customers participating in the CAISO's NGR market pilot program
- (22) Debit entry to record Customer Data Access (CDA) Project revenue requirements.
- (23) Debit entry to annually record the transfer of the December 31st balance from the Mobilehome Park Master Meter Balancing Account (MMMBA).
- (24) Credit entry to record User Fees paid by participants in the PEV Workplace Charging Pilot.
- (25) Debit or credit entry to annually transfer the balance in the Pole Loading and Deteriorated Pole Balancing Account (PLDPBA).
- (26) Debit or credit entry to annually transfer the distribution related balance in the Tax Accounting Memorandum Account (TAMA).
- (27) A debit or credit entry to record the monthly transfer from the Distribution Sub-account of the Local Capacity Requirements Products Balancing Account (LCRPBA).
- (28) Credit entry to record revenues associated with the Tehachapi Storage Project (e.g., revenues related to energy and ancillary services).
- (29) Debit entry to record Operation and Maintenance (O&M) expenses related to the continued operations of the Tehachapi Storage Project.
- (30) Debit entry to record Residential Rate Reform Bill protection revenue shortfalls.
- (31) Debit entry to record independent auditor(s) expenses associated with Rule 20 independent audits in accordance with Rulemaking 17-05-010. (N)
(N)

The sum of (1) through (31) equals the activity recorded in the Distribution Sub-account of the BRRBA. (T)

Interest Expense shall be calculated monthly by applying the Interest Rate to the average balance of the beginning-of-month and the end-of-month balances in the Distribution Sub-account.

5. Generation Sub-account:

The purpose of the Generation Sub-account of the BRRBA is to record on a monthly basis SCE's: (1) BRRBA Generation Revenue; (2) Authorized Generation Base Revenue Requirement (AGBRR), and other authorized revenue requirements, (e.g., Demand Response); and (3) other authorized costs and transfers approved by the Commission.

(Continued)

(To be inserted by utility)

Advice 3910-E
Decision _____

Issued by

Caroline Choi
Senior Vice President

(To be inserted by Cal. PUC)

Date Filed Dec 7, 2018
Effective Apr 3, 2019
Resolution _____



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