

Docket: : A.23-05-010
Exhibit Number : CA-01
Commissioner : Douglas
Admin Law Judge : Seybert/Park
Witness : T. Godfrey



PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

Report on the Results of Operations
for
Southern California Edison Company
General Rate Case
Test Year 2025

Executive Summary

San Francisco, California
February 29, 2024

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1 EXECUTIVE SUMMARY

2 I. INTRODUCTION – THE PUBLIC ADVOCATES OFFICE RECOMMENDS
3 LOWER REVENUE INCREASES FOR 2025 THRU 2028 COMPARED TO
4 SOUTHERN CALIFORNIA EDISON COMPANY’S PROPOSED
5 INCREASES

6 The Public Advocates Office at the
7 California Public Utilities Commission (Cal
8 Advocates) submits its report and exhibits in
9 response to Southern California Edison
10 Company’s (SCE) Application (A.) 23-05-010 for
11 a Test Year (TY) 2025 General Rate Case
12 (GRC). SCE proposes a 4-year (2025-2028)
13 GRC term.¹

14 This exhibit presents Cal Advocates’
15 executive summary, and addresses SCE’s
16 proposed revenue increases for TY 2025 and for
17 the 2026, 2027 and 2028 post-test years.

18 SCE requests that the California Public
19 Utilities Commission (Commission or CPUC)
20 authorize a base revenue requirement increase effective January 1, 2025 for the
21 utility’s Electric Operations (Distribution, Generation, and New System Generation)
22 which fall within the CPUC’s ratemaking jurisdiction.²

23 In SCE’s initial filing on May 12, 2023,³ SCE requested \$10.267 billion for
24 2025, which represents a \$1.896 billion, or 22.65 percent⁴ increase over its 2024

In its GRC Application, SCE requests 4-year revenue increases of:

- \$1.875 billion (22.40%) in 2025
- \$608 million (5.93%) in 2026,
- \$654 million (6.02%) in 2027, and
- \$645 million (5.61%) in 2028.

The Public Advocates Office recommends increases of:

- \$917 million (10.95%) in 2025
- \$479 million (5.16%) in 2026,
- \$502 million (5.14%) in 2027 and
- \$507 million (4.93%) in 2028.

¹ SCE’s Application, pp. 1 and 6.

² SCE’s Application, p. 6 and Exhibit (Ex.) SCE-07, Volume (Vol.) 01, p. 6.

³ In SCE’s Application filed on May 12, 2023, Cal Advocates noted that there were frequent references to “a number of errors in its forecast” that SCE had discovered, prior to filing its GRC, and presumably had not corrected. This uncertainty regarding the accuracy of SCE’s data added to the complexity of analyzing SCE’s forecasts (SCE’s Application, p. 19).

⁴ SCE’s Application, p. 6 and Ex. SCE-07, Vol. 01, p. 9.

1 authorized base revenue requirement (ABRR) of \$8.371 billion.⁵ On December 15,
2 2023, SCE issued an errata that revised its requested ABRR to \$10.246 billion⁶ for
3 2025, which represents a \$1.875 billion or 22.40 percent increase over its 2024
4 ABRR of \$8.371 billion. SCE also requested \$95.57 million in one-time
5 memorandum account recovery.⁷

6 Cal Advocates recommends \$9.288 billion⁸ for 2025 ABRR, which represents
7 a \$917 million, or 10.95 percent increase over SCE’s 2024 ABRR of \$8.371 billion
8 (\$958 million less than SCE’s request of \$10.246 billion). Table 1-1 compares Cal
9 Advocates’ and SCE’s forecasts of TY 2025 GRC revenues relative to the utility’s
10 currently authorized level of 2024 revenues.⁹ Cal Advocates proposes \$55.67
11 million in one-time memorandum account recoveries.
12

⁵ SCE’s Application, p. 7, Table 1. Note that SCE’s tables included in its Results of Operation errata (SCE-07, Volume 01) for December 15, 2023 show ABRR for 2024 as \$8.371 million. SCE’s Track 4 Decision (D.23-11-096) shows an authorized 2024 base revenue requirement of \$8.425 billion. SCE’s Advice Letter 5178-E (U 338-E) issued on December 28, 2023, shows an updated 2024 ABRR of \$8.382 billion. SCE’s supplemental data request response to PubAdv-SCE-295-TLG, Q.5, state that “SCE will provide updated RO Model support tables in SCE-07, Vol. 01 during the Updated Testimony phase of the proceeding, consistent with prior GRCs.”

⁶ SCE’s Supplemental data request response to PubAdv-SCE-295-TLG, Question 5.

⁷ SCE’s Application, p. 6.

⁸ Any differences in the numbers are due to rounding.

⁹ See Ex. CA-26 for Cal Advocates’ 2025 revenue requirement forecasts, by functional area.

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Table 1-1
SCE Requests a \$1.875 Billion Revenue Requirement Increase in 2025,
While Cal Advocates Recommends a \$917 Million Increase
(in Millions of Dollars)

| Description (a) | SCE 2024 Adopted Revenues (b) | SCE 2025 Proposed Revenues (c) | SCE Forecasted Increase over 2024 Adopted Revenues (d=c-b) | Cal Advocates 2025 Recommended Revenues (e) | Cal Advocates Recommended Increase over 2024 Adopted Revenues (f=e-b) |
|--------------------|--|---|---|---|--|
| ABRR | \$8,371 | \$10,246 | \$1,875 | \$9,288 | \$917 |

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6 Table 1-2 compares Cal Advocates' and SCE's forecasts of post-test year
7 2026, 2027 and 2028 revenue increases.

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Table 1-2
Comparison of SCE's Proposed Post-Test Year Revenue Increases¹⁰
With Cal Advocates' Recommended Revenue Increases
(in Millions of Dollars)

| Description (a) | SCE Requested 2026 Revenue Increase (b) | SCE Requested 2027 Revenue Increase (c) | SCE Requested 2028 Revenue Increase (d) | Cal Advocates Recommended 2026 Revenue Increase (e) | Cal Advocates Recommended 2027 Revenue Increase (f) | Cal Advocates Recommended 2028 Revenue Increase (g) |
|----------------------------------|--|--|--|---|---|---|
| Attrition Revenue Increase | \$608 | \$654 | \$645 | \$479 | \$502 | \$507 |

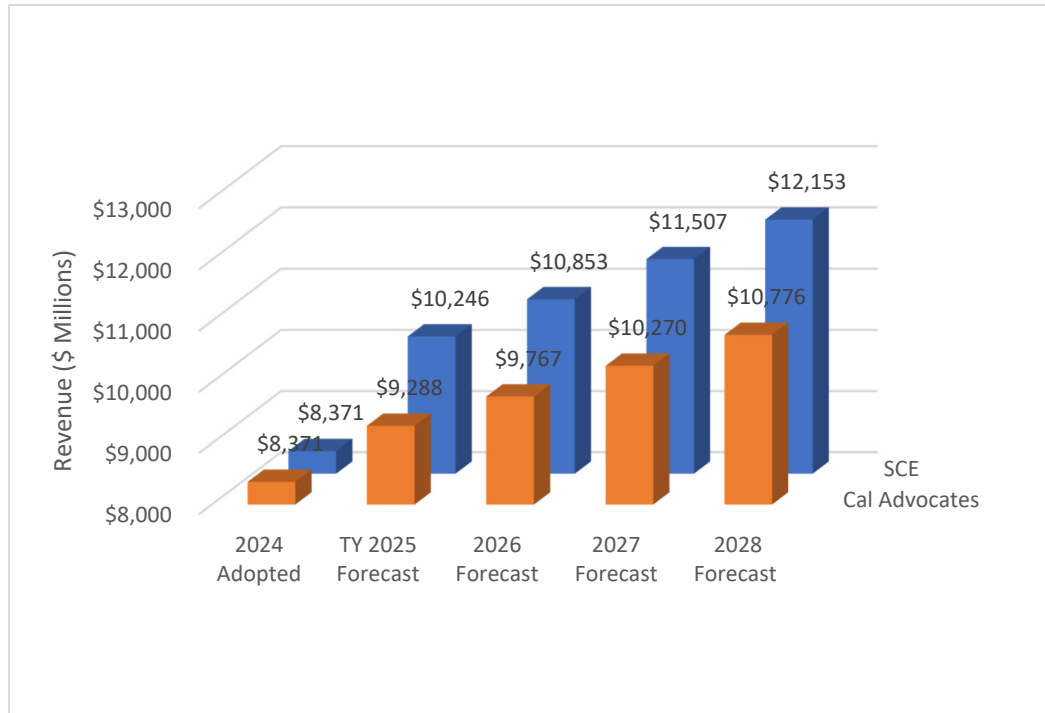
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¹⁰ Cal Advocates calculated SCE's figures from SCE's supplemental data request response to PubAdv-SCE-295-TLG, Q. 5. SCE included attrition revenue increases of \$619 million for 2026, \$664 million for 2027 and \$705 million for 2028 in its May 12, 2023 filing (SCE-07, Vol. 01, p. 9).

1 Figure 1-1 illustrates Cal Advocates' recommended revenue requirement
2 level for 2025 through 2028, compared to SCE's request.

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Figure 1-1



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6 II. OVERVIEW / SUMMARY

7 This section provides an overview and summary of SCE's requests and Cal
8 Advocate' recommendations regarding the utility's 2025 through 2028 revenue
9 requirement.

10 A. SCE Requests a \$1.875 Billion (22.40%) Revenue Increase for 11 2025, and Post-Test Year Revenue Increases of \$608 Million 12 (5.93%) for 2026, \$654 Million (6.02%) for 2027 and an 13 Additional \$645 Million (5.61%) for 2028

14 For its 2025 GRC, SCE requests that the Commission authorize a CPUC-
15 jurisdictional ABRR of \$10.246 billion for the utility's distribution, generation, and
16 new system generation rates, to be effective January 1, 2025. This represents a

1 \$1.875 billion increase in GRC base revenues over the current authorized level of
2 \$8.371 billion for 2024.

3 The Table 1-3 below compares SCE’s forecasts of Test Year 2025 GRC
4 revenues relative to its 2024 authorized revenue requirement.

5 **Table 1-3**
6 **SCE Requests a \$1.875 Billion Increase in GRC Revenues**
7 **Effective January 1, 2025 for CPUC-Jurisdictional Operations**
8 **(in Millions of Dollars)**

| Description (a) | SCE 2024 Adopted Revenues (b) | SCE 2025 Proposed Revenues (c) | \$ Increase over 2024 Adopted Revenues (d=c-b) | % Increase over 2024 Adopted Revenues (e=d/b) |
|--------------------|--|---|--|---|
| ABRR | \$8,371 | \$10,246 | \$1,875 | 22.40% |

9 SCE requests additional revenues in 2025 to cover higher costs associated
10 with, among other things: operating and maintaining its electric system, customer-
11 related expenses (e.g., meter installation, customer records and collection, and
12 responding to customer inquiries), administrative and general expenses (e.g.,
13 employee salaries, benefits, insurance, and outside contractors), and rate base
14 (e.g., net infrastructure investment).

15 SCE requests post-test year revenue increases of \$608 million (5.93%) for
16 2026, \$654 million (6.02%) for 2027 and an additional \$645 million (5.61%) for 2028,
17 broken down as follows in Table 1-4:¹¹

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¹¹ Figures calculated from SCE’s supplemental data request response to PubAdv-SCE-295-TLG, Q. 5.

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Table 1-4
SCE Requests Post-Test Year Revenue Increases of
\$608 Million for 2026, \$654 Million for 2027 and an Additional \$645 Million for 2028
(in Millions of Dollars)

| Description (a) | SCE 2025 Proposed Revenues (b) | SCE 2026 Proposed Revenue Increase (c) | SCE 2026 Proposed Revenues (d=b+c) | % Increase over 2025 Proposed Revenues (e=c/b) | SCE 2027 Proposed Revenue Increase (f) | SCE 2027 Proposed Revenues (g=f+d) | % Increase over 2026 Proposed Revenues (h=f/d) | SCE 2028 Proposed Revenue Increase (i) | SCE 2028 Proposed Revenues (j=g+i) | % Increase over 2027 Proposed Revenues (k=i/g) |
|-----------------|--------------------------------|--|------------------------------------|--|--|------------------------------------|--|--|------------------------------------|--|
| Proposed ABRR | \$10,246 | \$608 | \$10,853 | 5.93% | \$654 | \$11,507 | 6.02% | \$645 | \$12,153 | 5.61% |

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6 SCE proposes a post-test year ratemaking (PTYR) mechanism to account for
7 (1) rate base growth; (2) operations and maintenance (O&M) expense escalation;
8 (3) capital addition escalation; (4) wildfire mitigation capital expenditures associated
9 with Covered Conductor, Undergrounding and other wildfire mitigation activities; and
10 (5) discrete capital adjustments associated with four projects: T&D Training Center,
11 Del Valle Substation, Gorman-Kern River, and Kraemer- Edwards.¹² SCE also
12 proposes continuing the currently authorized Z-factor mechanism (which allows
13 revenue adjustments for exogenous events) adopted in its 2021 GRC, with
14 modifications.¹³

15 **B. SCE’s Proposed Revenue Increases for 2025 through 2028**
16 **Amount to \$11.275 Billion on a Cumulative Basis**

17 If the Commission adopts SCE’s proposals, the utility’s ratepayers would
18 experience a 4-year cumulative revenue increase of \$11.275 billion.¹⁴ Figure 1-2
19 illustrates SCE’s requested revenue requirement levels, and their components, for
20 2025 through 2028.

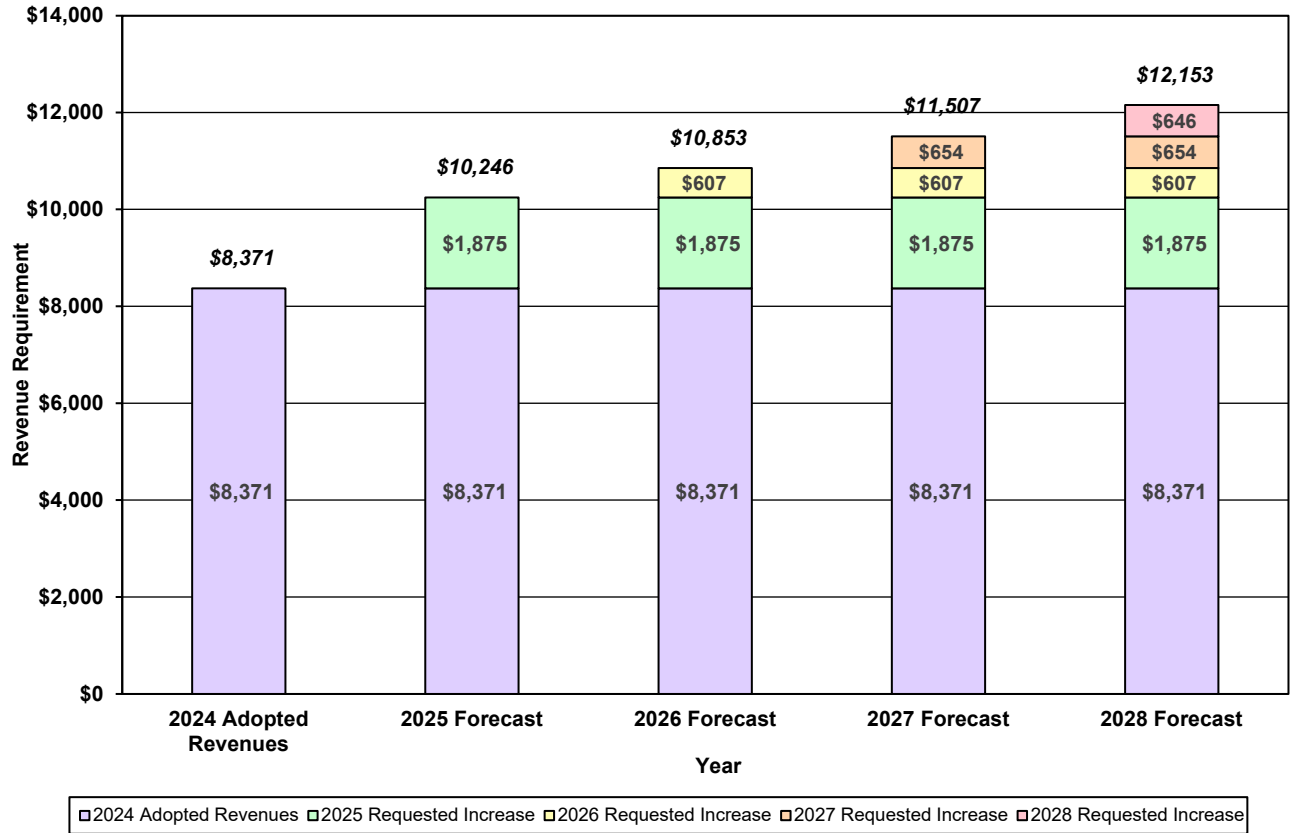
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¹² Ex. SCE-07, Vol. 04, pp. 22, 36 and 37.

¹³ Ex. SCE-07, Vol. 04, p. 38.

¹⁴ For this 4-year rate case cycle: (a) the \$1.875 billion increase in 2025 would be in effect for four years—2025, 2026, 2027 and 2028; (b) the \$607 million increase in 2026 would be in effect for three years—2026, 2027 and 2028; (c) the \$654 million increase in 2027 would be in effect for two years—2027 and 2028, and (d) the \$646 million increase would be in effect for just one year - 2028.

**Figure 1-2
SCE's Requested Revenue Requirement for 2025 through 2028
(In Millions of Dollars)**



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C. The Commission Should Reject SCE's Revenue Increases That Are Not Justified, and Adopt Cal Advocates' Recommendations

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Cal Advocates recommends that the Commission authorize \$9.288 billion in 2025 GRC base revenues for SCE compared to the utility's request for \$10.246 billion. Cal Advocates' proposed 2025 GRC revenue requirement is \$917 million (10.95%) higher than the 2024 authorized level, as shown in Table 1-5.

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Table 1-5
Cal Advocates Recommends an \$917 Million (10.95%) Increase in
GRC Revenues Effective January 1, 2025 for CPUC-Jurisdictional Operations
(in Millions of Dollars)

| Description (a) | SCE 2024 Adopted Revenues (b) | Cal Advocates 2025 Recommended Revenues (c) | Cal Advocates Recommended \$ Increase over 2024 Adopted Revenues (d=c-b) | Cal Advocates Recommended % Increase over 2024 Adopted Revenues (e=d/b) |
|-----------------|-------------------------------|---|--|---|
| ABRR | \$8,371 | \$9,288 | \$917 | 10.95% |

5 Cal Advocates recommends a post-test year revenue increase of \$479 million
6 (5.16%) for 2026, \$502 million (5.14%) for 2027 and \$507 million (4.93%) for 2028,
7 as shown in Table 1-6.

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Table 1-6
Cal Advocates' Post-Test Year Revenue Changes
(in Millions of Dollars)

| Description (a) | Cal Advocates 2025 Revenue Forecast (b) | Cal Advocates 2026 Revenue Increase (c) | Cal Advocates 2026 Revenue Forecast (d=b+c) | % Increase over 2025 Revenue Forecast (e=c/b) | Cal Advocates 2027 Revenue Increase (f) | Cal Advocates 2027 Revenue Forecast (g=f+d) | % Increase over 2026 Revenue Forecast (h=f/d) | Cal Advocates 2028 Revenue Increase (i) | Cal Advocates 2028 Revenue Forecast (j=g+i) | % Increase over 2027 Revenue Forecast (k=i/g) |
|-----------------|---|---|---|---|---|---|---|---|---|---|
| ABRR | \$9,288 | \$479 | \$9,767 | 5.16% | 502 | \$10,269 | 5.14% | \$507 | \$10,776 | 4.93% |

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12 **D. Cal Advocates' Recommended Revenue Increases for 2025**
13 **through 2028**

14 Cal Advocates' test year and post-test year forecasts would result in a 4-year
15 cumulative increase of \$6.616 billion,¹⁵ which is \$4.659 billion less than SCE's
16 request for a \$11.275 billion cumulative increase. If the Commission adopts Cal
17 Advocates forecasts, customers will experience smaller bill impacts over the 4-year
18 period from 2025-2028 relative to the SCE requests.

¹⁵ For this 4-year rate case cycle, Cal Advocates' test year and post-test year forecasts are as follows: (a) the \$917 million increase in 2025 would be in effect for four years—2025, 2026, 2027 and 2028; (b) the \$479 million increase in 2026 would be in effect for three years—2026, 2027 and 2028; (c) the \$502 million increase in 2027 would be in effect for two years—2027 and 2028, and (d) the \$507 million increase would be in effect for just one year – 2028.

1 **III. PROCEDURAL BACKGROUND AND SCHEDULE**

2 On May 12, 2023, SCE filed its Test Year 2025 GRC Application, A.23-05-
3 010, with the Commission. SCE's Application was first noticed on the Commission's
4 Daily Calendar on May 15, 2023. Cal Advocates submitted a timely Protest to the
5 Application on June 14, 2023. SCE submitted its Reply to Protests and Responses
6 on June 26, 2023.

7 A Prehearing Conference (PHC) was held on July 12, 2023. The Assigned
8 Commissioner's Scoping Memo and Ruling (Scoping Memo) was issued on
9 September 5, 2023 and established the procedural schedule. On July 14, 2023,
10 August 14, 2023, November 9, 2023, November 20, 2023, and December 15, 2023
11 SCE filed Errata Testimony. On December 22, 2023, SCE filed Supplemental
12 testimony. On January 4, 2024, the Administrative Law Judges (ALJs) issued their
13 E-mail ruling setting dates and times for four remote and two in-person Public
14 Participation Hearings (PPHs). The Memo/Ruling procedural schedule for SCE's
15 2025 GRC is shown below in Table 1-7.

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17 **Table 1-7**
18 **Procedural Schedule for Southern California Edison Company's**
19 **Test Year 2025 General Rate Case, A.23-05-010**

| Event | Date |
|--|--|
| Intervenor Testimony | February 29, 2024 |
| 2023 recorded expenditures served by SCE | March 11, 2024 |
| Rebuttal Testimony | April 15, 2024 |
| Evidentiary Hearings (virtual) | May 6-24, 2024 |
| Update testimony served | June 7, 2024 |
| Hearings on update testimony (virtual), if necessary | June 17, 2024 |
| Opening Briefs | July 8, 2024 |
| Reply Briefs | July 29, 2024 |
| Proposed Decision | Within 90 days after submission |
| Commission Decision | No sooner than 30 days after proposed decision |

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1 The procedural schedule requires intervenors to serve their testimony by
2 February 29, 2024. Cal Advocates fulfills the requirement by serving its testimony
3 today.

4 **IV. CAL ADVOCATES' DIRECT TESTIMONY**

5 Cal Advocates responds to SCE's TY 2025 GRC Application, A.23-05-010, by
6 issuing its "Report on the Results of Operations for Southern California Edison
7 Company Test Year 2025 General Rate Case," comprising of 30 exhibits. Cal
8 Advocates' team for this case consists of almost 50 staff responsible for the project
9 coordination, support, financial review, and analytical responsibilities needed to
10 process SCE's GRC application. Cal Advocates submitted over 377 data request
11 sets to SCE.

12 **A. Organization of Cal Advocates' Exhibits**

13 Table 1-8 shows the specific exhibit(s) and subject matter(s) for which each
14 Cal Advocates witness is responsible.
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**Table 1-8
Cal Advocates Exhibits with Corresponding
Subject Matter and Witnesses**

| Exhibit No. | Subject | Witness |
|--------------------|---|---------------------|
| CA-01 | Executive Summary | Tamera Godfrey |
| CA-02 | Distribution Grid Expenses | Ry Andresen |
| CA-03 | Distribution Infrastructure Replacement, Distribution Inspections & Maintenance, and Capital-Related, Part 1 of 7 | Greg Wilson |
| CA-04 | Meter Activities, New Service Connections and Customer Requested System Modifications, Poles, Part 2 of 7 | Refat Amin |
| CA-05 | Grid Modernization, Grid Technology, and Energy Storage, Part 3 of 7 | Marc Hutton |
| CA-06 | Grid Modernization, Grid Technology, and Energy Storage, Part 4 of 7 | Stephen Neal |
| CA-07 | Load Growth, Transmission Projects, and Engineering, Part 5 of 7 | Michelaina Johnson |
| CA-08 | Load Growth, Transmission Projects, and Engineering, Part 6 of 7 | Ellie Van Skike |
| CA-09 | Transmission Grid, Substations, Part 7 of 7 | Kaj Peterson |
| CA-10 | Wildfire Management Expenses | Dao Phan |
| CA-11 | Wildfire Management Capital Expenditures | Lindsay Loethen |
| CA-12 | Customer Service Operations | Mariana Campbell |
| CA-13 | Business Customer Services, Customer Programs and Services | Bridget Horan |
| CA-14 | Business Continuation, Emergency Management | Brennen Gallagher |
| CA-15 | Cybersecurity, Physical Security | Paul Worhach |
| CA-16 | Energy Procurement, Generation | Nahal Mirfendereski |
| CA-17 | Enterprise Technology and Enterprise Planning & Governance | Mark Waterworth |
| CA-18 | Enterprise Planning & Governance | Bernard Ayanruoh |
| CA-19 | Employee Benefits, Training and Support, Part 1 of 2 | Clair Emerson |
| CA-20 | Employee Benefits, Training and Support, Part 2 of 2 | Leah Rassam |
| CA-21 | Environmental Services, Audit, Ethics and Compliance, and Safety Programs | Fauzia Nawaz |
| CA-22 | Enterprise Operations | Monica Weaver |
| CA-23 | Policy, External Engagement, and Ratemaking | Truman Burns |
| CA-24 | Depreciation Expense, Asset Depreciation Study | Brandon Benitez |
| CA-25 | Rate Base, Working Capital | Phillip McNeil |
| CA-26 | Results of Operations, Other Operating Revenue, Taxes | Jerry Oh |
| CA-27 | Sales, Customers, and New Meter Connections, Mobilehome Park Costs | Maricela Sierra |
| CA-28 | Post Test Year Ratemaking and Productivity Adjustment | Tamera Godfrey |
| CA-29 | Financial Examination | Sophie Chia |
| CA-30 | Risk Policy | Miles Gordon |

1 **B. Summary of Cal Advocates' Recommendations**

2 The following briefly summarizes the recommendations contained within each
3 of Cal Advocates' exhibits that address SCE's application.

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|---|
| CA-01 Executive Summary |
| This exhibit provides a brief overview of SCE's request; presents the overall organization of Cal Advocates' exhibits; and summarizes some of the differences between Cal Advocates' and SCE's Test Year 2025 and Post-Test Year revenue requirement forecasts. |

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| CA-02 Distribution Grid O&M Expenses |
| This exhibit addresses SCE's Distribution Grid operations and maintenance (O&M) expenses for 2025. <ul style="list-style-type: none">• Cal Advocates recommends \$189.408 million for Distribution Inspections & Maintenance and Capital-Related, which is \$12.126 million lower than SCE's Test Year forecast of \$201.534 million.• Cal Advocates recommends \$131.465 million for Substation, which is \$43.522 million lower than SCE's Test Year forecast of \$174.987 million.• Cal Advocates recommends \$14.642 million for Grid Modernization, Grid Technology, and Energy Storage, which is \$22.925 million lower than SCE's Test Year forecast of \$37.567 million.• Cal Advocates recommends \$523.682 million for Vegetation Management, which is \$130.710 million lower than SCE's Test Year forecast of \$654.572 million. |

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| CA-03 Distribution Infrastructure Replacement, Distribution Inspections & Maintenance, and Capital-Related, Part 1 of 7 |
| This exhibit addresses SCE's Distribution Grid capital expenditures for the 3-year period 2023 to 2025. <ul style="list-style-type: none">• Cal Advocates recommends \$190.127 million for 2023, \$190.976 million for 2024, and \$661.749 million for 2025 for SCE's Distribution Infrastructure Replacement capital programs. Those forecasts are lower than SCE's by \$0.070 million for 2023, \$14.447 million for 2024, and \$139.288 million for 2025.• Cal Advocates recommends \$589.611 million for 2023, \$658.190 million for 2024, and \$717.544 million for 2025 for SCE's Distribution Inspection and Maintenance and Capital Related capital programs. Those forecasts are lower than SCE's by \$39.464 million for 2023, \$41.112 million for 2024, and \$42.294 million for 2025. |

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CA-04

Meter Activities, New Service Connections and Customer Requested System Modifications, Poles, Part 2 of 7

This exhibit addresses SCE's Distribution Grid capital expenditures for the 3-year period 2023 to 2025.

- Cal Advocates' 2023-2025 forecasts are \$84.861 million lower than SCE's 2023-2025 capital expenditures forecasts for Meter Activities, New Service Connections, and Customer Requested System Modification activities, and Poles Activities.
- Cal Advocates recommends \$26.892 million in 2023, \$40.259 million in 2024 and \$38.269 million in TY 2025 for Meter Activities, which are \$3.259 million lower than SCE's request of \$30.151 million in 2023, \$7.747 million lower than SCE's request of \$48.006 million in 2024, and \$7.854 million lower than SCE's request of \$46.123 million in TY 2025.
- Cal Advocates recommends \$521.487 million in 2023, \$592.539 million in 2024 and \$573.021 million in TY 2025 for New Service Connections, and Customer Requested System Modification Activities, which are \$12.108 million lower than SCE's request of \$533.595 million in 2023, \$17.042 million lower than SCE's request of \$609.581 million in 2024, and \$24.884 million lower than SCE's request of \$597.905 million in TY 2025.
- Cal Advocates recommends \$335.522 million in 2024 for Poles Activities, which is \$11.967 million lower than SCE's request of \$335.522 million in 2024.

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CA-05

Grid Modernization, Grid Technology, and Energy Storage, Part 3 of 7

This exhibit addresses SCE's Distribution Grid capital expenditures for the 3-year period 2023 to 2025.

- Cal Advocates does not oppose SCE's requests for Distribution Grid capital expenditures associated with Grid Modernization.
- Cal Advocates recommends that the Long-Term Planning Tool (LTPT), System Modelling Tool (SMT), and Distribution Resources Plan External Portal (DRPEP) use the Blanket-Specific in-service date designation in the RO model.

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CA-06

Grid Modernization, Grid Technology, and Energy Storage, Part 4 of 7

This exhibit addresses SCE's Distribution Grid capital expenditures for the 3-year period 2023 to 2025 and attrition years 2026 through 2028.

- Cal Advocates recommends \$0 for capital expenditures for Capital Pilot Projects, which is \$46.954 million lower than SCE's request of \$46.954 million.
- Cal Advocates recommends \$38.647 million for capital expenditures for Energy Storage in 2023-2028, which is \$82.555 million lower than SCE's request of \$121.202 million.
- Cal Advocates does not oppose SCE's request of \$24.714 million for capital expenditures for Grid Technology Laboratories in 2023-2028.

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CA-07

Load Growth, Transmission Projects, and Engineering, Part 5 of 7

This exhibit addresses SCE's Distribution Grid capital expenditures for the 3-year period 2023 to 2025 and attrition years 2026 through 2028.

- Cal Advocates recommends Baseline¹⁶ capital expenditure of \$96.8 million in 2023, \$143.6 million in 2024, \$165.8 million in 2025, \$286.9 million in 2026, \$265.2 million in 2027, and \$215.4 million in 2028, which are \$116.7 million lower than SCE's forecast in 2023, \$122.6 million lower than SCE's forecast in 2024, \$108.8 million lower than SCE's forecast in 2025, \$122.8 million lower than SCE's forecast in 2026, \$138.9 million lower than SCE's forecast in 2027, and \$143.5 million lower than SCE's forecast in 2028. Cal Advocates' Baseline recommendations reflect the reductions proposed in both Ex. CA-07 and Ex. CA-08.
- Cal Advocates recommends \$21.1 million in 2023, \$44.3 million in 2024, and \$38.6 million in 2025 for Transmission Projects, which are \$8.7 million lower than SCE's forecast in 2023, \$8.1 million lower than SCE's forecast in 2024, and \$5.7 million lower than SCE's forecast in 2025.

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CA-08

Load Growth, Transmission Projects, and Engineering, Part 6 of 7

This exhibit addresses SCE's Distribution Grid capital expenditures for the 3-year period 2023 to 2025 and attrition years 2026 through 2028.

- Cal Advocates recommends \$0 million in 2023, \$0 million in 2024, \$0 million in 2025, \$0 million in 2026, \$0 million in 2027 and \$0 million in 2028 for Transportation Electrification Grid Readiness (TEGR) compared to SCE's forecasts of \$0 million for 2023, \$32.7 million for 2024, \$131.9 million for 2025, \$168.8 million for 2026, \$242.2 million for 2027, and \$240.5 million for 2028.

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¹⁶ The Baseline Forecast capital categories consist of the Distribution Substation Plan (DSP), Transmission Substation Plan (TSP), System Improvement Programs, Land Rights Management, and Climate Driven Circuit Ties (Ex. SCE-02, Vol. 07, p. 42).

CA-09

Transmission Grid, Substations Part 7 of 7

This exhibit addresses SCE’s Distribution Grid capital expenditures for the 3-year period 2023 to 2025.

- Cal Advocates recommends \$18.339 million for the Transmission Infrastructure Replacement (TIR) Program for TY 2025, which is \$43.330 million less than SCE’s request of \$61.668 million; and SCE be required to demonstrate the cost-effectiveness of the new approach via a Tier 2 Advice Letter for further recovery.
- Cal Advocates recommends memorandum-account treatment for incremental costs arising from the shift to a proactive approach in the TIR program.
- If the Commission does not adopt Cal Advocates’ primary recommendation regarding the TIR program mentioned above, Cal Advocates recommends \$778,977 for the Pothead Replacement Program in TY 2025, which is \$175,831 lower than SCE’s TY 2025 request of \$954,808. If the Commission adopts this recommendation for the TIR program, this adjustment should instead be considered in the recommended Advice Letter process.
- Cal Advocates recommends an in-service date for the Gorman-Kern-River (GKR) TLRR project of August 2028; an in-service date for the Control-Silver Peak (CSP) TLRR project of April 2029; and an in-service date for the Ivanpah-Control (IC) TLRR project of August 2030, to reflect the most recent, up-to-date timelines.
- Cal Advocates recommends a TY 2025 expenditure of \$30.047 million for the TLRR program, which is \$43.043 million lower than SCE’s request of \$73.090 million.
- Cal Advocates recommends \$17.656 million as the contingency for the Gorman-Kern River (GKR) TLRR project, which is \$41.641 million less than SCE’s request of \$59.297 million.
- Cal Advocates recommends a TY 2025 expenditure of \$55.024 million for the Transformer Bank Replacement Program, which is \$6.891 million lower than SCE’s request of \$61.915 million.
- Cal Advocates recommends memorandum-account treatment for capital expenditure associated with T&D Equipment for the Edison Training Academy. This results in a recommended expenditure of \$41.611 million for TY 2025 Substation Preventative Maintenance, which is \$3.482 million lower than SCE’s \$45.093 million request, but provides the potential for cost recovery of the adjusted amount in future rate cases.

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CA-10

Wildfire Management O&M Expenses

This exhibit addresses SCE's Wildfire Management operations and maintenance (O&M) expenses for 2025.

- Cal Advocates recommends \$109.247 million for High Fire Risk Inspections and Remediations which is \$21.771 million lower than SCE's Test Year forecast of \$131.018 million.
- Cal Advocates recommends \$4.240 million for Wildfire Mitigation and Vegetation Management Technology Solutions which is \$2.501 million lower than SCE's Test Year forecast of \$6.741 million.
- Cal Advocates recommends \$16.107 million for PSPS Execution which is \$4.834 million lower than SCE's Test Year forecast of \$20.941 million.
- Cal Advocates recommends \$29.741 million for PSPS Customer Support which is \$6.354 million lower than SCE's Test Year forecast of \$36.095 million.
- Cal Advocates recommends \$26.516 million for Aerial Suppression which is \$8.484 million lower than SCE's Test Year forecast of \$35 million.
- Cal Advocates recommends \$6.454 million for Enhanced Situational Awareness which is \$3.602 million lower than SCE's Test Year forecast of \$10.056 million.

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CA-11

Wildfire Management Capital Expenditures

This exhibit addresses SCE's Wildfire Management capital expenditures for the 3-year period 2023 to 2025 and attrition years 2026 through 2028.

- Cal Advocates does not oppose SCE's request of \$25.6 million in 2023 and \$48.9 million in 2024 for the Targeted Undergrounding Program.
- Cal Advocates recommends \$197.8 million in 2025 compared to SCE's request of \$305.0 million, \$608.1 million in 2026 compared to SCE's request of \$851.6 million, \$928.4 million in 2027 compared to SCE's request of \$1,143.4 million, and \$831.4 million in 2028 compared to SCE's request of \$966.7 million for the Targeted Undergrounding Program.
- Cal Advocates recommends \$604.8 million in 2023 compared to SCE's request of \$840.5 million, \$681.9 million in 2024 compared to SCE's request of \$879.8 million, \$557.8 million in 2025 compared to SCE's request of \$638.5 million, \$190.4 million in 2026 compared to SCE's request of \$222.9 million, \$24.0 million in 2027 compared to SCE's request of \$29.7 million, and \$23.7 million in 2028 compared to SCE's request of \$30.0 million for the Wildfire Covered Conductor Program.

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CA-12
Customer Service Operations

This exhibit addresses SCE's Customer Service Operations O&M expenses for 2025 and capital expenditures for the 3-year period 2023 to 2025.

- Cal Advocates recommends \$46.13 million for Billing Services, which is \$2.02 million lower than SCE's Test Year forecast of \$48.15 million.
- Cal Advocates recommends \$49.80 million for Customer Contact Center which is \$8.0 million lower than SCE's Test Year forecast of \$57.8 million.
- Cal Advocates opposes SCE's proposed New Paper-bill Fee.
- Cal Advocates does not oppose SCE's Uncollectible factor of 0.191%.

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CA-13
Business Customer Services, Customer Programs and Services

This exhibit addresses SCE's Business Customer Services, Customer Programs and Services O&M expenses for 2025 and capital expenditures for the 3-year period 2023 to 2025.

- Cal Advocates recommends \$22.760 million for Business Customer Services, which is \$3.380 million lower than SCE's Test Year forecast of \$26.140 million.
- Cal Advocates recommends \$29.308 million for Customer Programs & Services, which is \$5.270 million lower than SCE's Test Year forecast of \$34.578 million.

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CA-14
Business Continuation and Emergency Management

This exhibit addresses SCE's Business Continuation and Emergency Management O&M expenses for 2025 and capital expenditures for the 3-year period 2023 to 2025.

- Cal Advocates recommends \$27.299 million for Emergency Management O&M expenses, which is \$0.884 million less than SCE's request of \$28.183 million.
- Cal Advocates recommends capital expenditures of \$105.271 million for 2023, \$117.229 million for 2024 and \$122.868 million for 2025 for SCE's Business Continuation and Emergency Management.

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CA-15
Cybersecurity and Physical Security

This exhibit addresses SCE's Cybersecurity and Physical Security O&M expenses for 2025 and capital expenditures for the 3-year period 2023 to 2025.

- Cal Advocates recommends \$31.501 million for Cybersecurity O&M expenses, which is \$10.063 million lower than SCE's TY forecast of \$41.564 million.

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CA-16

Energy Procurement, Generation

This exhibit addresses SCE’s Energy Procurement and Generation O&M expenses for 2025 and capital expenditures for the 3-year period 2023 to 2025.

- Cal Advocates recommends \$26.763 million for TY 2025 for SCE’s Energy Procurement O&M expenses, which is \$2.948 million lower than SCE’s request of \$29.711 million.
- Cal Advocates recommends \$45.067 million for TY 2025 for SCE’s Hydro O&M expenses, which is \$8.408 million lower than SCE’s TY 2025 request of \$53.475 million.
- Cal Advocates does not oppose SCE’s requests for Fossil Fuel O&M expenses of \$44.109 million, Solar O&M expenses of \$4.347 million, and Nuclear (Palo Verde) O&M expenses of \$83.104 million.
- For Hydro capital expenditures, Cal Advocates recommends \$32.072 million for 2023 which is \$72.260 million lower than SCE’s request of \$104.331 million for 2023; \$38.684 million for 2024, which is \$40.852 million lower than SCE’s request of \$79.536 million, and \$73.646 million for 2025, which is \$6.455 million more than SCE’s request of \$67.191 million.
- Cal Advocates does not oppose SCE’s request for Fossil Fuel capital expenditures, Solar capital expenditures, and Nuclear (Palo Verde) capital expenditures for 2023, 2024, and 2025.

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CA-17

Enterprise Technology, Enterprise Technology -OU Capitalized Software and Enterprise Planning & Governance

This exhibit addresses issues related to SCE’s Enterprise Technology, Enterprise Technology – OU Capitalized Software, Enterprise Planning & Governance O&M expenses for 2025 and capital expenditures for the 3-year period 2023 to 2025.

- Cal Advocates recommends \$227.1 million for Enterprise Technology O&M expenses, which is \$61.1 million lower than SCE’s forecast of \$288.2 million.
- Cal Advocates recommends \$431.0 million for Enterprise Planning & Governance O&M expenses, which is \$13.0 million lower than SCE’s forecast of \$444.0 million.
- Cal Advocates recommends \$736.9 million for capital expenditures for Enterprise Technology in 2023-2025, which is \$204.6 million lower than SCE’s request of \$941.5 million.

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CA-18

Enterprise Planning & Governance

This exhibit addresses issues related to SCE's Enterprise Planning & Governance O&M expenses for 2025.

- Cal Advocates recommends \$28.338 million, which is \$1.368 million lower than SCE's Test Year forecast of \$29.706 million for its In-House Legal.
- Cal Advocates recommends \$13.231 million for SCE's Outside-Legal expenses, which is \$1.687 million lower than SCE's forecast of \$14.918 million.
- Cal Advocates recommends \$11.655 million for SCE's Claims, Injuries & Other Damages, which is \$4.245 million lower than SCE's forecast of \$15.900 million.
- Cal Advocates recommends \$9.621 million for SCE's Claims Write-Offs, which is \$1.486 million lower than SCE's forecast of \$11.107 million.
- Cal Advocates recommends \$32.751 million for SCE's Business Planning, which is \$4.482 million lower than SCE's forecast of \$37.233 million.
- Cal Advocates recommends \$23.994 million for SCE's Corporate Services, which is \$0.356 million lower than SCE's forecast of \$24.350 million.
- Cal Advocates recommends a TY forecast of \$5.908 million, which is \$2.494 million lower than SCE's forecast for Modeling, Analysis and Forecasting.
- Cal Advocates recommends \$3.275 million for SCE's Supplier Diversity Development, which is \$0.321 million lower than SCE's forecast of \$3.596 million.

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CA-19

Employee Benefits, Training and Support, Part 1 of 2

This exhibit addresses issues related to SCE's Employee Benefits and Programs O&M expenses for 2025.

- Cal Advocates recommends \$43.195 million for SCE's Short-Term Incentive Program (STIP), which is \$71.991 million lower than SCE's TY request of \$115.186 million.
- Cal Advocates recommends no ratepayer funding for SCE's Long-Term Incentive Program (LTI), which is \$22.017 million lower than SCE's TY request of \$22.017 million.
- Cal Advocates recommends \$14.394 million for SCE's Executive Compensation, which is \$3.044 million lower than SCE's TY request of \$17.438 million.
- Cal Advocates recommends \$126.312 million for SCE's Medical Programs, which is \$16.703 million lower than SCE's TY request of \$143.015 million.
- Cal Advocates recommends \$8.336 million for SCE's Executive Benefits, which is \$8.336 million lower than SCE's TY request of \$16.672 million.
- Cal Advocates recommends no ratepayer funding for SCE's Recognition Programs, which is \$0.411 million lower than SCE's TY request of \$0.411 million.

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CA-20

Employee Benefits, Training and Support, Part 2 of 2

This exhibit addresses issues related to SCE's Employee Support and Employee Training O&M expenses for 2025.

- Cal Advocates recommends \$35.078 million for Operating Unit Support Services, which is \$5.990 million lower than SCE's TY forecast of \$41.068 million.
- Cal Advocates recommends \$10.758 million for Talent Solutions, which is \$1.502 million lower than SCE's TY forecast of \$12.260 million.
- Cal Advocates recommends \$17.997 million for Employee Training and Development, which is \$7.595 million lower than SCE's TY forecast of \$25.592 million.
- Cal Advocates recommends \$25.309 million for Transmission & Distribution – Training Seat Time which is \$11.714 million lower than SCE's TY forecast of \$37.023 million.
- Cal Advocates recommends \$16.431 million for Transmission & Distribution – Employee Training Delivery and Development, which is \$6.767 million lower than SCE's TY forecast of \$23.198 million.

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CA-21

Environmental Services, Audit, Ethics and Compliance, and Safety Programs

This exhibit addresses issues related to SCE's Environmental Services, Audit, Ethics & Compliance (E&C), and Safety Programs O&M expenses for 2025 and capital expenditures for the 3-year period 2023 to 2025.

- Cal Advocates recommends \$34.834 million for Environmental Services, which is \$8.201 million lower than SCE's Test Year forecast of \$43.035 million.
- Cal Advocates recommends \$25.615 million for Safety Programs, which is \$5.546 million lower than SCE's Test Year forecast of \$31.161 million.
- Cal Advocates recommends \$21.614 million for Audit, Ethics & Compliance, which is \$3.592 million lower than SCE's Test Year forecast of \$25.206 million.
- Programmatic Permits: Cal Advocates recommends \$0.268 million for 2023, which is \$3.997 million lower than SCE's 2023 request of \$4.266 million, \$1.223 million for 2024, which is \$3.129 million lower than SCE's 2024 request of \$4.351 million, \$1.247 million for 2025, which is \$3.191 million lower than SCE's request of \$4.439 million.
- Safety Strategy & Transformation: Cal Advocates recommends \$0.700 million for 2025, which is \$2.099 million lower than SCE's 2025 request of \$2.799 million.

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CA-22
Enterprise Operations

This exhibit addresses issues related to SCE's Enterprise Operations O&M expenses for 2025 and capital expenditures for the 3-year period 2023 to 2025.

- For Facility and Land Operations Total capital expenditures, SCE requests \$151.716 million, \$201.903 million, and \$287.654 million in 2023, 2024, and 2025, respectively. Cal Advocates recommends \$128.035 million in 2023, \$166.674 million in 2024, and \$220.307 million in 2025, respectively. Cal Advocates' recommendation is lower than SCE's request by \$23.681 million in 2023, \$35.229 million in 2024, and \$67.347 million in 2025.

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CA-23
Policy, External Engagement, and Ratemaking

This exhibit addresses issues related to SCE's Policy, External Engagement and Ratemaking O&M expenses for 2025.

- Cal Advocates recommends \$0.220 million for Professional Development & Education, which is \$1.893 million lower than SCE's Test Year forecast of \$2.113 million. This represents a 100% reduction to SCE's Edison Electric Institute (EEI) dues.
- Cal Advocates does not oppose SCE's O&M forecasts of \$19.838 million for Develop and Manage Policy & Initiatives, \$7.723 million for Education, Safety and Operations, and \$5.361 million for Implement Ratemaking Cost Recovery activities.

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CA-24
Depreciation Expense, Asset Depreciation Study

This exhibit addresses issues related to SCE's depreciation expense and asset depreciation study for 2025.

- Cal Advocates recommends no change to the currently authorized negative net salvage rates for FERC Accounts 362, 365, 366, 367 and 368.
- Cal Advocates forecasts an annual small hydro decommissioning accrual of \$26.95 million, in contrast to SCE's proposed \$62.1 million.

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CA-25
Rate Base and Working Capital

This exhibit addresses issues related to SCE's Rate Base and Working Capital for Test Year 2025. Cal Advocates' adjustments include the following:

- Apply a 5-year compound annual growth rate of 2.24% to develop the forecast for the TY 2025 Mountainview Emission Credit balance.
- A revenue lag day of 49.5 days instead of 57.5 days as SCE proposes.
- A payment order lag day of 45 days instead of 42 days as SCE proposes.
- A Federal Income Tax lag day of 365 days instead of 54 days as SCE proposes.
- A California State Corporation Franchise Tax lag day of 328.5 days instead of 40 days as SCE proposes.
- Apply a Non-Labor O&M Escalation Rate to SCE's Customer Advances from the base year to develop the test year forecast.
- Treat SCE's Customer Deposits consistent with the requirements set forth under the Commission's original Standard Practice U-16.

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CA-26
Results of Operations, Other Operating Revenue, Taxes

This exhibit addresses issues related to SCE's Summary of Earnings for 2025, Results of Operations, Other Operating Revenues and Payroll, Property and Income Taxes.

- RO Model: Cal Advocates used SCE's December 15, 2023 version of the RO model with some manual inputs and modifications.
- Cal Advocates does not oppose SCE's forecast for Other Operating Revenue.
- Cal Advocates does not oppose SCE's method by which SCE calculates state and federal income taxes, payroll and other taxes, and Ad Valorem Taxes.
- Cal Advocates does not oppose SCE's proposal to continue the Tax Accounting Memorandum Account in this rate case cycle.

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CA-27
Sales, Customers, and New Meter Connections, Mobilehome Park Costs

This exhibit addresses issues related to SCE's Sales, Customers, and New Meter Connections for 2025. This exhibit also reviews SCE's Mobilehome Park costs.

- Cal Advocates recommends 4,561,585 for 2023, 4,588,897 for 2024, and 4,616,850 for TY 2025 for Residential Customers.
- Cal Advocates recommends 33,084 for 2023, 31,142 for 2024, and 31,798 for TY 2025 for the New Meter Connections forecast.
- Cal Advocates recommends that SCE be directed to provide all raw data for all variables in workpapers and the monthly forecasted results from EViews for all equations as part of its workpapers in its next GRC.
- Cal Advocates does not take issue with SCE's Mobilehome Park Costs for TY2025.

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CA-28

Post Test-Year Ratemaking and Productivity Adjustment

This exhibit addresses issues related to SCE's Post Test Year Ratemaking proposals for 2026, 2027 and 2028.

- Cal Advocates recommends post-test year revenue increases of \$479 million (5.16%) in 2026, \$502 million (5.14%) in 2027 and \$507 million in 2028 (4.93%), compared to SCE's requested increases of \$608 million (5.93%), \$654 million (6.02%) and \$645 million (5.61%), respectively.
- Cal Advocates proposes that a productivity factor of 1% be implemented each year beginning in the test year and in the post-test years. Given the increased pressure on rates, SCE's management should be expected to operate more efficiently.
- Cal Advocates opposes SCE's request to apply Z-factor adjustments in the test year.

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CA-29

Financial Examination

This exhibit presents the results of examination and recommendations relating to SCE's financial and accounting records.

- Cal Advocates recommends removing the audit costs to perform the internal audits that SCE asserts are protected by attorney-client privilege. Cal Advocates recommends the removal of \$731,000 in 2018; \$2.257 million in 2019; \$587,000 in 2020; \$219,000 in 2021; and \$601,000 in 2022 from SCE's recorded Audit costs for GRC forecasting purposes.
- Cal Advocates recommends an adjustment of \$3.088 million to 2021 recorded A&G non-labor expenses to SCE's Employee and Contractor Safety for transactions that are one-time expenses for GRC forecasting purposes.
- SCE requests recovery of \$95.570 million in eleven memorandum accounts while Cal Advocates recommends recovery of \$55.671 million. SCE proposes to recover the December 31, 2024 balances for costs recorded through December 31, 2022 and forecast 2023 and 2024 costs yet to be actually incurred and recorded in the memorandum accounts to be approved in this TY 2025 GRC proceeding. The forecast 2023 and 2024 memorandum costs that SCE proposes to recover are estimates and are not actual recorded costs. Cal Advocates does not oppose the recovery of actual recorded costs through December 31, 2022 of \$55.671 million but opposes the recovery of SCE's forecast of 2023 and 2024 costs of \$39.899 million which are not actually incurred and recorded in the memorandum accounts. SCE can request recovery of actual recorded 2023 and 2024 memorandum account costs in the next GRC proceeding or other appropriate application.
- Cal Advocates recommends that the Customer Service Re-Platform Memorandum Account, the Seismic Retrofit for Non-Electric Facilities Memorandum Account, and the NEM Online Application System Memorandum Account remain open.

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CA-30
Risk Policy

This exhibit presents the analyses and recommendations associated with SCE's policies and processes pertaining to Enterprise Risk Management.

- The Commission should direct Southern California Edison to revise its Integrated Wildfire Mitigation Strategy (IWMS) to: Prioritize and locate its undergrounding projects in areas with the greatest wildfire and Public Safety Power Shutoff (PSPS) risks; Modify its mitigation selection process in its designated Severe Risk Areas to analyze alternatives to undergrounding. SCE's current mitigation selection process fails to analyze, compare, and select more cost-effective alternatives to undergrounding when available.
- The Commission should direct SCE to identify and plan its undergrounding projects in areas with the greatest wildfire and PSPS risk. SCE currently proposes to select costly undergrounding wildfire mitigation even in areas with relatively low likelihood of wildfire and PSPS events. In these areas alternatives to undergrounding are likely more cost-effective.
- The Commission should establish a reporting requirement to allow Commission evaluation of SCE's wildfire mitigation program risk reduction effectiveness to support Commission oversight and utility accountability.
- The Commission should require SCE to submit its evaluation of the combined effectiveness of Rapid Earth Fault Current Limiter (REFCL) + Covered Conductor at reducing ignitions to Safety Policy Division and the current GRC service list. This information is necessary for the Commission to evaluate the cost, risk reduction, and mitigation effectiveness of this wildfire mitigation.

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1 **V. WITNESS QUALIFICATIONS- TAMERA L. GODFREY**

2 My name is Tamera L. Godfrey. My business address is 505 Van Ness
3 Avenue, San Francisco, California San Francisco, California. I am employed by the
4 Public Advocates Office (Cal Advocates) as a Program and Project Supervisor in the
5 Energy Cost of Service and Natural Gas Branch. I am Project Coordinator for Cal
6 Advocates' activities regarding SCE's 2025 GRC.

7 I received a Master's Degree in Public Administration and a Bachelor of Arts
8 Degree in Political Science from California State University, Hayward.

9 Since joining Cal Advocates in 1998, I have worked on numerous General
10 Rate Cases (GRCs) and Reasonableness Reviews. I have been an expert witness
11 and prepared testimony in the following areas and proceedings: Administrative &
12 General expenses, Total Compensation, Employee Benefits expenses (excluding
13 Pension and PBOPs), Incentive Compensation, Transmission and Distribution
14 Operations and Maintenance (O&M) expenses, Short-Term Incentive Plan
15 expenses, Energy Supply O&M expenses, Customer Services O&M expenses, SCE
16 Results Sharing Associated with PBR Performance Incentives and Related
17 Adjustments in Order Instituting Investigation (I).06-06-014, Pipeline Records
18 Integration Program Costs for PG&E's Pipeline Safety Enhancement Plan, in Order
19 Instituting Rulemaking (R.) 11-02-019, Shared Services costs, Other Operating
20 Revenues, Electric Distribution O&M expenses, and Wildfire Management O&M
21 expenses.

22 I have served as project coordinator and assistant project coordinator and
23 have testified numerous times before the California Public Utilities Commission.

24 This completes my prepared testimony.