



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

**FILED**

09/26/23

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A2306001

Application of Southern California Edison  
Company (U 338-E) For Approval of Its 2024  
ERRA Forecast Proceeding Revenue  
Requirement

A.23-06-001

**JOINT MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U-338-E),  
PUBLIC ADVOCATES OFFICE, CALIFORNIA COMMUNITY CHOICE ASSOCIATION,  
AND DIRECT ACCESS CUSTOMER COALITION TO OFFER PREPARED TESTIMONIES  
AND EXHIBITS INTO EVIDENCE**

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Direct Access Customer Coalition

**Date: September 26, 2023**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

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Company (U 338-E) For Approval of Its 2024  
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**JOINT MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U-338-E),  
PUBLIC ADVOCATES OFFICE, CALIFORNIA COMMUNITY CHOICE ASSOCIATION,  
AND DIRECT ACCESS CUSTOMER COALITION TO OFFER PREPARED TESTIMONIES  
AND EXHIBITS INTO EVIDENCE**

Pursuant to the California Public Utilities Commission’s Rules of Practice and Procedure (Rules) 11.1, 13.8, and 13.11, Southern California Edison Company (SCE), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), California Community Choice Association (CalCCA), and Direct Access Customer Coalition (DACC) (collectively, the Joint Parties) respectfully file *this Joint Motion to Offer Prepared Testimonies and Exhibits into Evidence* (Joint Motion).<sup>1</sup> An Exhibit Index is attached hereto as Appendix A.

Concurrently with this Joint Motion and pursuant to Rule 11.5(b), SCE and CalCCA will file a *Joint Motion to Seal the Evidentiary Record* (Joint Motion to Seal) to move that the shaded portions of their respective confidential exhibits be sealed.

**A. SCE**

SCE hereby moves, and Cal Advocates, CalCCA, and DACC do not object, that the Commission receive the following prepared testimony and exhibits into evidence in this proceeding:

1. **Exhibit SCE-01**, including the confidential and public versions, titled *Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations*.

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<sup>1</sup> Pursuant to Rule 1.8(d), SCE confirms that counsel for Cal Advocates, CalCCA, and DACC have authorized SCE to file this Motion on their behalf.

2. **Exhibit SCE-02**, including the confidential and public versions, titled *Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations – (Local CPE)*.
3. **Exhibit SCE-03**, titled *Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations Witness Qualifications and Declarations re: Confidentiality*.<sup>2</sup>
4. **Exhibit SCE-04**, including the confidential and public versions, titled *Supplemental Testimony Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations*.
5. **Exhibit SCE-04-E**, including the confidential and public versions, titled *Supplemental Testimony Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations ERRATA*.
6. **Exhibit SCE-05**, including the confidential and public versions, titled *Rebuttal Testimony of Southern California Edison Company in Support of Its Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations*.

## **B. CalCCA**

CalCCA hereby moves, and SCE, Cal Advocates, and DACC do not object, that the Commission receive the following prepared testimony and exhibits into evidence in this proceeding:

1. **Exhibit CalCCA-01**, including the confidential and public versions, titled *Prepared Direct Testimony of Brian Dickman on Behalf of the California Community Choice Association in Southern California Edison Company's 2024 ERRA Forecast Proceeding*.
2. **Exhibit CalCCA-02**, including the confidential and public versions, titled *SCE Responses to Certain Data Requests Issued in Lieu of Cross Examination*.
3. **Exhibit CalCCA-03**, titled *Select Passages of Prepared Testimony from A.22-05-029 (PG&E's 2023 ERRA Forecast Case)*.<sup>3</sup>
4. **Exhibit CalCCA-04**, titled *Select Passages of Prepared from A.22-05-012 (PG&E's 2024 ERRA Forecast Case)*.<sup>4</sup>

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<sup>2</sup> Exhibit SCE-03 does not have a confidential counterpart.

<sup>3</sup> Exhibit CalCCA-03 does not have a confidential counterpart.

<sup>4</sup> Exhibit CalCCA-04 does not have a confidential counterpart.

These exhibits have been served on Honorable Judge Sisto and on parties that executed the Commission's model non-disclosure agreement or otherwise have access to confidential information in this proceeding prior to or concurrent with the filing of this Motion on and, in the cases of the public versions of the testimony, on parties to the service list. The exhibits have been verified by the signed declarations and/or qualification statements of the sponsoring witnesses, as appropriate.

Respectfully submitted on behalf of the Joint Parties,

JANET S. COMBS

*/s/ Janet S. Combs*

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By: JANET S. COMBS

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**September 26, 2023**

**Appendix A**  
**EXHIBIT INDEX**

<b>Proceeding No.</b>
A.23-06-001

<b>ALJ</b>
Sisto

## EXHIBIT INDEX

Exh. No.	Date		Sponsor/Witness	Description	link
	Ident.	Recd.			
CalCCA-01			Brian Dickman	Prepared Direct Testimony of Brian Dickman on behalf of the California Community Choice Association in Southern California Edison Company's 2024 ERRA Forecast Proceeding – Public	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6619/518875491.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6619/518875491.pdf</a>
CalCCA-01C			Brian Dickman	Prepared Direct Testimony of Brian Dickman on behalf of the California Community Choice Association in Southern California Edison Company's 2024 ERRA Forecast Proceeding – Confidential	N/A [Sent to ALJ Sisto via Kiteworks on September 19, 2023]
CalCCA-02			Eric Lee (SCE)	SCE Responses to Certain Data Requests Issued in Lieu of Cross Examination – Public	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6715/520483941.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6715/520483941.pdf</a>
CalCCA-02C			Eric Lee (SCE)	SCE Responses to Certain Data Requests Issued in Lieu of Cross Examination – Confidential	N/A [Sent to ALJ Sisto via Kiteworks on September 22, 2023]
CalCCA-03			Eric Lee (SCE)	Select Passages of Prepared Testimony from A.22-05-029 (PG&E's 2023 ERRA Forecast Case)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6713/520482287.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6713/520482287.pdf</a>
CalCCA-04			Eric Lee (SCE)	Select Passages of Prepared from A.22-05-012 (PG&E's 2024 ERRA Forecast Case)	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6713/520480456.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6713/520480456.pdf</a>
SCE-01			T. Cameron T. Salisbury D. Coher K. Seeto R. Hite H. Sheng M. Khouzam M. Sheriff E. Lee R. Thomas	SCE's Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations – Public	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6135/510461198.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6135/510461198.pdf</a>

			R. Liang A. Wong C. Louie		
SCE-01C			T. Cameron T. Salisbury D. Coher K. Seeto R. Hite H. Sheng M. Khouzam M. Sheriff E. Lee R. Thomas R. Liang A. Wong C. Louie	SCE's Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations – Confidential	N/A [Sent to Chief ALJ Cooke via Kiteworks on June 1, 2023]
SCE-02			E. Lee M. Litos	Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations – (Local CPE) – Public	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6141/510287689.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6141/510287689.pdf</a>
SCE-02C			E. Lee M. Litos	Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations – (Local CPE) – Confidential	N/A [Sent to Chief ALJ Cooke via Kiteworks on June 1, 2023]
SCE-03			T. Cameron T. Salisbury D. Coher K. Seeto R. Hite H. Sheng M. Khouzam M. Sheriff E. Lee R. Thomas R. Liang A. Wong M. Litos C. Louie	Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations Witness Qualifications and Declarations re: Confidentiality.	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6138/510444334.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6138/510444334.pdf</a>
SCE-04			E. Lavik	Supplemental Testimony Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations – Public	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6564/517407803.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6564/517407803.pdf</a>
SCE-04C			E. Lavik	Supplemental Testimony Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations – Confidential	N/A [Sent to ALJ O'Rourke via Kiteworks on August 15, 2023]
SCE-04E			E. Lavik	Supplemental Testimony Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations ERRATA – Public	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6693/520107257.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6693/520107257.pdf</a>

SCE-04CE			E. Lavik	Supplemental Testimony Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations ERRATA – Confidential	N/A [Sent to ALJ Sisto via Kiteworks on September 12, 2023]
SCE-05			E. Lee T. Salisbury	Rebuttal Testimony of Southern California Edison Company in Support of Its Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations – Public	<a href="https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6694/520118707.pdf">https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6694/520118707.pdf</a>
SCE-05C			E. Lee T. Salisbury	Rebuttal Testimony of Southern California Edison Company in Support of Its Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations – Confidential	N/A [Sent to ALJ Sisto via Kiteworks on September 12, 2023]