



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

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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)  
AND CALIFORNIA COMMUNITY CHOICE ASSOCIATION TO SEAL A PORTION  
OF THE EVIDENTIARY RECORD**

JANET S. COMBS

TIM LINDL

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, CA 91770  
Telephone: (626) 302-1524  
Email: Janet.Combs@sce.com

Keyes & Fox LLP  
580 California Street, 12<sup>th</sup> Floor  
San Francisco, CA 94104  
Telephone: (510) 314-8385  
Email: tlindl@keyesfox.com

Attorney for  
Southern California Edison Company

Attorney for  
California Community Choice Association

**Date: September 26, 2023**

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

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Pursuant to Rule 11.5 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) and California Community Choice Association (CalCCA) (collectively, the Parties) respectfully file this Joint Motion to Seal a Portion of the Evidentiary Record (Joint Motion to Seal). SCE and CalCCA are joining the concurrent filing of the *Joint Motion to Offer Prepared Testimonies and Exhibits into Evidence* in this proceeding pursuant to Rules 11.1 and 13.8, and 13.11 of the Commission’s Rules of Practice and Procedure.<sup>1</sup>

By this Joint Motion to Seal, SCE and CalCCA move the Commission for an order granting confidential treatment to portions identified by gray shading in the confidential version of the following exhibits:

**A. SCE**

1. **Exhibit SCE-01C**, titled *Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations*.
2. **Exhibit SCE-02C**, titled *Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations – (Local CPE)*.

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<sup>1</sup> Pursuant to Rule 1.8(d), SCE confirms that counsel for CalCCA has authorized SCE to file this Motion on its behalf.

3. **Exhibit SCE-04C**, titled *Supplemental Testimony Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations*.
4. **Exhibit SCE-04C-E**, titled *Supplemental Testimony Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations ERRATA*.
5. **Exhibit SCE-05C**, titled *Rebuttal Testimony of Southern California Edison Company in Support of Its Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations*.

**B. CalCCA**

1. **Exhibit CalCCA-01C**, 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-02C**, titled *SCE Responses to Certain Data Requests Issued in Lieu of Cross Examination*.

SCE and CalCCA have each served confidential versions of their respective foregoing documents on Honorable Judge Sisto and parties in this proceeding that executed the Commission's model non-disclosure agreement or otherwise have access to confidential information in this proceeding. The service list was served with redacted, public versions of the aforementioned exhibits. The exhibits have been verified by the signed declarations and/or qualification statements of the sponsoring witnesses, as appropriate.

**I.**

**PREPARED TESTIMONY AND EXHIBITS OF SCE AND CALCCA AND ATTACHED APPENDICES CONTAIN CONFIDENTIAL AND/OR MARKET SENSITIVE INFORMATION**

In D.06-06-066, the Commission set forth standards for designating information as confidential in Commission proceedings. As part of that decision, the Commission set forth in the attached Appendix 1 a matrix that identified several categories of data and the level of confidentiality granted to each category. Specifically, the Commission stated in Ordering Paragraph 2 that “[w]here a party seeks

confidentiality protection for data contained in the Matrix, its burden shall be to prove that the data match the Matrix category. Once it does so, it is entitled to the protection the Matrix provides for that category.<sup>2</sup>

SCE and CalCCA are seeking confidential protection of certain confidential information contained in the above-referenced exhibits. The confidential information, which has been shaded in gray in the confidential versions of the exhibits, is confidential pursuant to the D.06-06-066 matrix or is otherwise entitled to confidential protection by the Commission as set forth in the accompanying confidentiality declarations.

The tables provided in the witness confidentiality declarations contained in **Exhibit SCE-03**, *Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations Witness Qualifications and Declarations re: Confidentiality*, **Exhibit-04C**, *Supplemental Testimony*, **Exhibit-04C-E Errata**, **Exhibit SCE-05C**, *Rebuttal Testimony of Southern California Edison Company in Support of Its Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations* and **Exhibit CalCCA-02C**, *SCE Responses to Certain Data Requests Issued in Lieu of Cross Examination*, indicate where the information is found in SCE's exhibits, a short description of the information, and the corresponding category in the matrix that grants confidentiality (or support for why the information is otherwise confidential). This information is not already public, and cannot be aggregated, redacted, summarized, or otherwise protected in a way that allows partial disclosure. CalCCA seeks to protect the information identified as confidential in its confidential exhibits based on SCE's confidentiality declarations.

## II.

### CONCLUSION

For these reasons, SCE and CalCCA respectfully request that the Commission seal portions of the evidentiary record identified by gray shading in the confidential versions of the exhibits listed above.

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<sup>2</sup> D.06-06-006, p.80.

Respectfully submitted on behalf of the Parties,

JANET S. COMBS

*/s/ Janet S. Combs*

By: JANET S. COMBS

Attorney for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-1524  
E-mail: Janet.Combs@sce.com

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