

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



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Application of Southern California Edison
Company (U338E) For Approval of Its 2024
ERRA Forecast Proceeding Revenue Requirement.

Application No. 23-06-001

**MOTION OF THE CALIFORNIA COMMUNITY CHOICE ASSOCIATION TO MOVE
EXHIBITS INTO THE RECORD**

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On behalf of
California Community Choice Association

October 27, 2023

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OF THE STATE OF CALIFORNIA**

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Pursuant to California Public Utilities Commission (Commission) Rules of Practice and Procedure Rule 11.1 and Rule 13.7, California Community Choice Association¹ (CalCCA) hereby submits this Motion to Move Exhibit into the Record (Motion) in the above captioned proceeding (Forecast Application). The exhibits at issue, pre-marked as Exhibit CalCCA-05 and Exhibit CalCCA-05C, contain two Responses from Southern California Edison (SCE) to CalCCA Data Requests 7.02 and 7.03.

The exhibits CalCCA seeks to admit into the record directly relate to, and are necessary to resolving, issues raised by the Forecast Application. The data requests pertain to *SCE's Updated Testimony Energy Resource Recovery Account (ERRA) 2024 Forecast of Operations*, pre-marked Exhibits SCE-06, SCE-07, and SCE-08, submitted on October 13, 2023 (October Update) and were issued after SCE served the October Update. The documents include certain of SCE's responses to CalCCA's data requests regarding SCE's data inputs and calculations that impact the

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

Power Charge Indifference Amount (PCIA) rates that are ultimately charged to CalCCA members' customers, and therefore directly relate to resolution of the question of whether SCE's calculation of the PCIA is reasonable, and whether its requested 2024 ERRA forecast revenue requirement is reasonable.² While the data request responses are not expressly cited in the October 27, 2023, *Opening Brief and Comments of the California Community Choice Association*, the responses provide data underlying the updated figures utilized therein. Accordingly, CalCCA respectfully requests that the exhibits be admitted into evidence and entered into the record.

For the foregoing reasons, CalCCA requests that this Motion be granted and that Exhibits CalCCA-05 and CalCCA-05C, as identified in Attachment A hereto, be admitted into evidence and entered into the record.

Respectfully submitted,



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Dated: October 27, 2023

² A.23-06-001, *Assigned Commissioner's Scoping Ruling*, pp. 2-4 (August 14, 2023).

**ATTACHMENT A
CALCCA PROPOSED ADDITIONS TO EXHIBIT LIST**

A.23-06-001 – ALJ Carolyn Sisto

Exhibit No.	Description with Link to CPUC Supporting Document	Sponsoring Party	Date Introduced	Date Entered
CCA-05	SCE Response to CalCCA DRs 7.02 and 7.03 (Public Version)	CalCCA	October 27, 2023	
https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2306001/6835/520613716.pdf				
CCA-05C	SCE Response to CalCCA DRs 7.02 and 7.03 (Confidential Version)	CalCCA	October 27, 2023	
N/A (Sent to ALJ Sisto via Kiteworks on October 27, 2023)				