



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

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Application of Southern California Edison Company (U 338-E) for a Commission Finding that its Procurement-Related and Other Operations for the Record Period January 1 Through December 31, 2022 Complied with its Adopted Procurement Plan; for Verification of its Entries in the Energy Resource Recovery Account and Other Regulatory Accounts; and for Recovery of \$51.442 Million Recorded in Five Accounts.

A.23-04-003

**JOINT MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E),
PUBLIC ADVOCATES OFFICE AT THE CALIFORNIA PUBLIC UTILITIES
COMMISSION, AND CALIFORNIA COMMUNITY CHOICE ASSOCIATION TO
OFFER PREPARED TESTIMONIES AND EXHIBITS INTO EVIDENCE**

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Date: March 22, 2024

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

Application of Southern California Edison Company (U 338-E) for a Commission Finding that its Procurement-Related and Other Operations for the Record Period January 1 Through December 31, 2022 Complied with its Adopted Procurement Plan, for Verification of its Entries in the Energy Resource Recovery Account and Other Regulatory Accounts; and for Recovery of \$51.442 Million Recorded in Five Accounts.

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Pursuant to Rules 11.1, 13.8 and 13.11 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure and Administrative Law Judge Patricia Miles’ *E-Mail Ruling Cancelling Evidentiary Hearings dated March 11, 2024*, Southern California Edison Company (SCE), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), and the California Community Choice Association (CalCCA) (collectively, the Joint Parties) respectfully file this *Joint Motion to Offer Prepared Testimonies and Exhibits into Evidence* (Joint Motion to Offer).¹

The Joint Parties respectfully move that all of the exhibits listed in this Joint Motion to Offer be admitted into evidentiary record of this proceeding on the grounds that the exhibits are relevant to the issues to be determined in this proceeding as set forth in the *Assigned Commissioner’s Amended Scoping Memo and Ruling*, dated January 5, 2024. Attached for

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

convenience as Attachment A to this Joint Motion to Offer is a joint exhibit list, which contains links to the testimony previously served in this proceeding (along with any accompanying attachments), data request responses, and other documents that the Joint Parties are seeking to move into the evidentiary record of this proceeding.

Concurrently with this Joint Motion and pursuant to Rule 11.5(b), the Joint Parties will file a *Joint Motion to Seal the Evidentiary Record* (Joint Motion to Seal) with respect to their confidential exhibits.

SCE

1. SCE hereby moves, and Cal Advocates, and CalCCA do not object, that the Commission receive the following prepared testimony and exhibits into evidence in this proceeding: Exhibit SCE-01, including the confidential and public versions, titled Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-V. SCE moves that the shaded portions of the confidential version, Exhibit SCE-01C, be sealed as set forth in the Joint Motion to Seal.
2. Exhibit SCE-01E, including the confidential and public versions, titled *Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-V ERRATA*. SCE moves that the shaded portions of the confidential version, Exhibit SCE-01CE, be sealed as set forth in the Joint Motion to Seal.
3. Exhibit SCE-02, including the confidential and public versions, titled *Energy Resource Recover Account (ERRA) Review of Operations, 2022 Chapters I-IX*. SCE moves that the shaded portions of the confidential version, Exhibit SCE-02C, be sealed as set forth in the Joint Motion to Seal.
4. Exhibit SCE-03, including the confidential and public versions, titled *Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-II*. SCE moves that the shaded portions of the confidential version, Exhibit SCE-03C, be sealed as set forth in the Joint Motion to Seal.

5. Exhibit SCE-04, including the confidential and public versions, titled *Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapter I*. SCE moves that the shaded portions of the confidential version, Exhibit SCE-04C, be sealed as set forth in the Joint Motion to Seal.
6. Exhibit SCE-05, titled *Energy Resource Recovery Account (ERRA) Compliance Requirement Chapter I*.
7. Exhibit SCE-06, titled *Energy Resource Recovery Account (ERRA) Review of operations, 2022 Witness Qualifications and Declarations re: Confidentiality*.
8. Exhibit SCE-07, including the confidential and public versions, titled *Energy Resource Recovery Account (ERRA) Review of operations, 2022 SCE-01 and SCE-02 Appendices*. SCE moves that the shaded portions of the confidential version, Exhibit SCE-07C, be sealed as set forth in the Joint Motion to Seal.
9. Exhibit SCE-08, including the confidential and public versions, titled *Supplemental Testimony of Southern California Edison Company in Support of Its 2022 Energy Resource Recovery Account Review Application*. SCE moves that the shaded portions of the confidential version, Exhibit SCE-08C, be sealed as set forth in the Joint Motion to Seal.
10. Exhibit SCE-09A, including the confidential and public versions, titled *Amended Rebuttal Testimony of Southern California Edison Company in Support of Its 2022 Energy Resource Recovery Account Review Application*. SCE moves that the shaded portions of the confidential version, Exhibit SCE-09CA, be sealed as set forth in the Joint Motion to Seal.

Cal Advocates

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

Exhibit CA-01, including the confidential and public versions, titled *Amended Testimony on Application of Southern California Edison Company for a Commission Finding that its Procurement-Related and Other Operations for the Record Period January 1 through December 31, 2022 Complied with its Adopted Procurement Plan; for Verification of its Entries in the Energy Resource Recovery Account and Other Regulatory Accounts; and for Recovery of \$51.442 Million Recorded in Five Accounts*, served on March 1, 2024. Cal Advocates moves that the shaded portions of the confidential version, Exhibit CA-01C, be sealed as set forth in the Joint Motion to Seal.

CalCCA

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

1. CalCCA-01, including the confidential and public versions, titled *Prepared Direct Testimony of Brian Shuey on behalf of CalCCA in Southern California Edison Company's 2022 ERRR Compliance Proceeding*.
2. CalCCA-02, including the confidential and public versions, titled *SCE Responses to CalCCA Data Requests Sets 3 and 4*.

These exhibits have been served prior to the filing of this Motion on Honorable Administrative Law Judge Patricia Miles and, in the cases of the public versions of the testimony, on other 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
DANIEL R. CULHANE

/s/ Daniel R. Culhane

By: Daniel R. Culhane

California admission pending

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Dated: March 22, 2024

Appendix A

Joint Exhibit List

Proceeding No.
A.23-04-003

Joint Exhibit List
SCE 2022 ERRA COMPLIANCE
March 22, 2024

ALJ
Patricia Miles

Exh. No.	Witness/ Sponsor	Description	Entered into Evidence	Link on CPUC Supporting Documents Website
SCE EXHIBITS				
SCE-01	Various	Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-V **PUBLIC VERSION**		SCE-01 (Public)
SCE-01C	Various	Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-V **CONFIDENTIAL VERSION**		Not applicable.
SCE-01E		Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-V ERRATA **PUBLIC VERSION**		SCE-01E (Public)
SCE-01CE		Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-V ERRATA **CONFIDENTIAL VERSION**		Not applicable
SCE-02	Various	Energy Resource Recover Account (ERRA) Review of Operations, 2022 Chapters I-IX **PUBLIC VERSION**		SCE-02 (Public)
SCE-02C	Various	Energy Resource Recover Account (ERRA) Review of Operations, 2022 Chapters I-IX **CONFIDENTIAL VERSION**		Not applicable.
SCE-03	Various	Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-II **PUBLIC VERSION**		SCE-03 (Public)
SCE-03C	Various	Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-II **CONFIDENTIAL VERSION**		Not applicable.
SCE-04	Various	Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapter I **PUBLIC VERSION**		SCE-04 (Public)

Exh. No.	Witness/ Sponsor	Description	Entered into Evidence	Link on CPUC Supporting Documents Website
SCE-04C	Various	Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapter I **CONFIDENTIAL VERSION**		Not applicable.
SCE-05	Baldwin	Energy Resource Recovery Account (ERRA) Compliance Requirement Chapter I		SCE-05
SCE-06	Various	Energy Resource Recovery Account (ERRA) Review of operations, 2022 Witness Qualifications and Declarations re: Confidentiality		SCE-06 Wit Quals and Conf Decls
SCE-07		Energy Resource Recovery Account (ERRA) Review of operations, 2022 SCE-01 and SCE- 02 Appendices **PUBLIC VERSION**		SCE-07 Appendices (Public)
SCE-07C		Energy Resource Recovery Account (ERRA) Review of operations, 2022 SCE-01 and SCE- 02 Appendices **CONFIDENTIAL VERSION**		Not applicable.
SCE-08	Various	Supplemental Testimony of Southern California Edison Company in Support of Its 2022 Energy Resource Recovery Account Review Application **PUBLIC VERSION**		SCE-08 Supplemental Testimony (Public)
SCE-08C	Various	Supplemental Testimony of Southern California Edison Company in Support of Its 2022 Energy Resource Recovery Account Review Application **CONFIDENTIAL VERSION**		Not applicable.
SCE-09A	Various	Amended Rebuttal Testimony of Southern California Edison Company in Support of Its 2022 Energy Resource Recovery Account Review Application **PUBLIC VERSION**		SCE-09A Amended Rebuttal Testimony (Public)

Exh. No.	Witness/ Sponsor	Description	Entered into Evidence	Link on CPUC Supporting Documents Website
SCE-09C	Various	Amended Rebuttal Testimony of Southern California Edison Company in Support of Its 2022 Energy Resource Recovery Account Review Application **CONFIDENTIAL VERSION**		Not applicable.

Proceeding No.
A.23-04-003

**Joint Exhibit List
SCE 2022 ERRRA COMPLIANCE
March 22, 2024**

ALJ
Patricia Miles

Exh. No.	Witness/ Sponsor	Description	Entered into Evidence	Link on CPUC Supporting Documents Website
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CAL ADVOCATES EXHIBITS				
CA-01	Various	Amended Testimony on Application of Southern California Edison Company for a Commission Finding that its Procurement-Related and Other Operations for the Record Period January 1 through December 31, 2022 Complied with its Adopted Procurement Plan; for Verification of its Entries in the Energy Resource Recovery Account and Other Regulatory Accounts; and for Recovery of \$51.442 Million Recorded in Five Accounts (March 1, 2024) **PUBLIC VERSION**		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2304003/7095/526504567.pdf
CA-01C	Various	Amended Testimony on Application of Southern California Edison Company for a Commission Finding that its Procurement-Related and Other Operations for the Record Period January 1 through December 31, 2022 Complied with its Adopted Procurement Plan; for Verification of its Entries in the Energy Resource Recovery Account and Other Regulatory Accounts; and for Recovery of \$51.442 Million Recorded in Five Accounts (March 1, 2024) **CONFIDENTIAL VERSION**		Not applicable.

Proceeding No.
A.23-04-003

**Joint Exhibit List
SCE 2022 ERRA COMPLIANCE
March 22, 2024**

ALJ
Patricia Miles

Exh. No.	Witness/ Sponsor	Description	Entered into Evidence	Link on CPUC Supporting Documents Website
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CalCCA EXHIBITS				
CalCCA-01		Prepared Direct Testimony of Brian Shuey on behalf of CalCCA in Southern California Edison Company's 2022 ERRA Compliance Proceeding (December 5, 2023) **PUBLIC VERSION**		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2304003/6920/521260177.pdf
CalCCA-01C		Prepared Direct Testimony of Brian Shuey on behalf of CalCCA in Southern California Edison Company's 2022 ERRA Compliance Proceeding (December 5, 2023) **CONFIDENTIAL VERSION**		Not applicable.
CalCCA-02		SCE Responses to CalCCA Data Requests Sets 3 and 4 **PUBLIC VERSION**		https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2304003/7145/527220893.pdf
CalCCA-02C		SCE Responses to CalCCA Data Requests Sets 3 and 4 **CONFIDENTIAL VERSION**		Not applicable.