



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

**FILED**

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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  
SEAL A PORTION OF THE EVIDENTIARY RECORD**

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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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SEAL A PORTION OF THE EVIDENTIARY RECORD**

Pursuant to Rule 11.5 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 Seal a Portion of the Evidentiary Record* (Joint Motion to Seal). The Joint Parties are filing this Joint Motion to Seal concurrently with the filing of the *Joint Motion to Offer Prepared Testimony and Exhibits into Evidence* in this proceeding, which is being filed pursuant to Rules 11.1 and 13.8, and 13.11 of the Commission’s Rules of Practice and Procedure.<sup>1</sup>

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<sup>1</sup> 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.

By this Joint Motion to Seal, SCE Cal Advocates, 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:

**SCE**

1. Exhibit SCE-01C, titled *Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-V.*
2. Exhibit SCE-01CE, titled *Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-V ERRATA.*
3. Exhibit SCE-02C, titled *Energy Resource Recover Account (ERRA) Review of Operations, 2022 Chapters I-IX.*
4. Exhibit SCE-03C, titled *Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapters I-II.*
5. Exhibit SCE-04C, titled *Energy Resource Recovery Account (ERRA) Review of Operations, 2022 Chapter I.*
6. Exhibit SCE-07C, titled *Energy Resource Recovery Account (ERRA) Review of operations, 2022 SCE-01 and SCE-02 Appendices.*
7. Exhibit SCE-08C, titled *Supplemental Testimony of Southern California Edison Company in Support of Its 2022 Energy Resource Recovery Account Review Application*
8. Exhibit SCE-09CA, titled *Amended Rebuttal Testimony of Southern California Edison Company in Support of Its 2022 Energy Resource Recovery Account Review Application.*

**Cal Advocates**

1. Exhibit CA-01C, 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.*

**CalCCA**

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

SCE, Cal Advocates, and CalCCA have each served confidential versions of their respective foregoing documents on Honorable Administrative Law Judge Patricia Miles and, where applicable, parties in this proceeding that executed the Commission's model non-disclosure agreement. 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, CALCCA, AND CAL  
ADVOCATES AND ATTACHED APPENDICES CONTAIN CONFIDENTIAL AND/OR  
MARKET SENSITIVE INFORMATION**

In Decision (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 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, CalCCA, and Cal Advocates are seeking confidential protection of certain information contained in the above-referenced exhibits. The information, which has been shaded in gray in the confidential versions of the exhibits, has been marked as confidential by SCE pursuant to the D.06-06-066 matrix or SCE otherwise considers confidential.

The tables provided in the witness confidentiality declarations contained in Exhibit SCE-06, titled *Energy Resource Recovery Account (ERRA) Review of operations, 2022 Witness Qualifications and Declarations re: Confidentiality*, indicate where the information marked as confidential by SCE 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. SCE, Cal Advocates and CalCCA seek to protect the information identified as confidential in its confidential exhibits based on SCE's confidentiality declarations.

## II.

### CONCLUSION

For these reasons, SCE, Cal Advocates, 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> Decision 06-06-066, p.80.

Respectfully submitted on behalf of the Joint Parties,

JANET S. COMBS  
DANIEL R. CULHANE

*/s/ Daniel R. Culhane*

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By: Daniel R. Culhane

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*California admission pending*

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**Dated: March 22, 2024**