BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of Southern California Edison Company (U 338-E) Regarding Energy Resource Recovery Account Trigger Mechanism; Expedited Treatment Requested.	Application 26-09-019

CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S RESPONSE TO THE APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) REGARDING ENERGY RESOURCE RECOVERY ACCOUNT TRIGGER MECHANISM

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SUMMARY OF RECOMMENDATIONS[1]

- The Commission should consolidate this Application with SCE's pending 2027 ERRA Forecast Application, A.26-05-006, and resolve both applications concurrently in a single decision, rather than dismissing this Application as moot.
- The Commission should issue a ruling consolidating the proceedings as early as practicable, and in any event before the deadline for Comments on SCE's October Update in A.26-05-006, so that parties can address the ERRA Trigger Balance in the same testimony, comments, briefs, and other filings as the 2027 ERRA Forecast.
- The Commission should adopt the procedural schedule already established in A.26-05-006 for the consolidated proceeding and should not adopt a separate schedule for this Application.
- An amended scoping memo for the consolidated proceeding should add the trigger-related issues identified herein.
- CalCCA agrees with SCE's proposed categorization of this proceeding as ratesetting and does not believe separate evidentiary hearings on this Application are necessary at this time.

[1] Acronyms used herein are defined in the body of this document.

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CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S RESPONSE TO THE APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) REGARDING ENERGY RESOURCE RECOVERY ACCOUNT TRIGGER MECHANISM

Pursuant to Rule 2.6 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure,[2] the California Community Choice Association[3] (CalCCA) hereby responds to the *Application of Southern California Edison Company (U 338-E) Regarding Energy Resource Recovery Account Trigger Mechanism; Expedited Treatment Requested* (Application), filed September 30, 2026.[4] This response is timely filed pursuant to Commissioner Baker's October 2, 2026 *Assigned Commissioner's Ruling on Expedited Schedule*

[2] State of California Public Utilities Commission, Rules of Practice and Procedure, California Code of Regulations Title 20, Division 1, Chapter 1.

[3] 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 of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, 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, Valley Clean Energy, and WestLight Energy.

[4] A.26-09-019, *Application of Southern California Edison Company (U 338-E) Regarding Energy Resource Recovery Account Trigger Mechanism; Expedited Treatment Requested* (Sept. 30, 2026) (Application).

Notice of Prehearing Conference and Preliminary Categorization, which set parties Protests and Responses due on October 12, 2026.[5]

In its Application, Southern California Edison Company (SCE) reports that, as of August 31, 2026, its ERRA Trigger Balance—the sum of the Energy Resource Recovery Account (ERRA) Balancing Account (ERRA BA) balance and the bundled service customers' share of the Portfolio Allocation Balancing Account (PABA) balance—was over-collected by $236.864 million, or 5.17 percent of SCE's recorded 2025 generation revenues.[6] That balance exceeds both SCE's 2026 Trigger Point and Trigger Threshold.[7] SCE attributes the overcollection primarily to "lower wholesale power and natural gas prices relative to the forecasts used" to set its 2026 rates.[8] Although SCE's forecast showed the ERRA Trigger Balance self-correcting, SCE stated that it could not reasonably determine that the balance would self-correct within 120 days because the Final 2026 Market Price Benchmarks (MPB), issued on October 1, 2026, could significantly change the balance.[9] The Final 2026 MPBs were drastically lower than the Forecast 2026 MPBs,[10] and will significantly change the trajectory and amount of the expected over-collection. SCE will issue a new forecast balance for the coming months and a new proposed revenue requirement for 2027 in its ERRA Forecast October Update on October 15, 2026, or three days after the filing of this Response.

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5 *Assigned Commissioner's Ruling on Expedited Schedule Notice of Prehearing Conference and Preliminary Categorization* (Oct. 2, 2026) at 2.

6 Application at 3; A.26-09-019, Ex. SCE-01, *Testimony in Support of Expedited Application of Southern California Edison Company (U 338-E) Regarding Energy Resource Recovery Account Trigger Mechanism* (Sept. 30, 2026) (SCE-01) at 8.

7 Application at 2-3.

8 *Id*. at 1, 3; SCE-01 at 8-11.

9 Application at 1 n.1; SCE-01 at 12-13.

10 Cal. Pub. Util. Comm., *Market Price Benchmark Calculations 2026* (Oct. 1, 2026).

In this Application, SCE does not propose an immediate rate change. Instead, SCE requests authority to maintain its ERRA-related rates at current levels and to address the ERRA Trigger Balance through the 2026 year-end balances that will be incorporated into its 2027 ERRA Forecast rates, which SCE expects to implement on January 1, 2027.[11] To that end, SCE asks the Commission to consolidate this Application with its pending 2027 ERRA Forecast Application, A.26-05-006, or, alternatively, to dismiss this Application as moot.[12]

CalCCA supports SCE's request to consolidate this Application with A.26-05-006, consistent with the Commission's approach to similar Trigger Applications in past years. Both proceedings concern the same balancing accounts, the same Final 2026 MPBs, the same year-end balances, and the same January 1, 2027, rate change. Consolidation will allow the Commission to resolve the ERRA Trigger Balance on a single, complete record, avoid duplicative litigation, and prevent inconsistent treatment of balances that will directly affect both bundled service customers and the community choice aggregator (CCA) customers who pay the Power Charge Indifference Adjustment (PCIA). For the reasons below, the Commission should grant SCE's request to consolidate the proceedings and should resolve both applications concurrently under the schedule already adopted in A.26-05-006.

CalCCA does not oppose the alternate relief SCE requests, which is to dismiss this Application as moot, provided no party challenges the Administrative Law Judge's order directing SCE to "incorporate all analysis related to A.26-09-019 in its October Update in A.26-05-006" and that parties should "address any matters from A.26-09-019 in comments and/or briefs for A.26-05-006."[13]

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11 Application at 1-2, 5; SCE-01 at 16.
12 Application at 4-5.
13 A.26-05-006, *Email Ruling Addressing Trigger Application* (Oct. 5, 2026).

I. CALCCA'S INTEREST IN THE APPLICATION

CalCCA's participation in this proceeding is warranted to protect the interests of the CCAs it represents and the interests of those CCAs' customers. While CalCCA represents 24 CCAs across California, it represents a total of twelve CCAs that serve SCE's delivery service customers: California Choice Energy Authority (a hybrid joint powers authority with eight CCA associate members),[14] Central Coast Community Energy, Clean Power Alliance of Southern California, Desert Community Energy, and Orange County Power Authority. Each of those organizations is governed by a Board of Directors comprised of elected officials who represent the individual cities and counties the CCA serves, or an elected City Council. While CalCCA's advocacy frequently benefits both bundled and unbundled customers, the CCAs are the sole advocates for their customers and their local energy programs before this Commission.

CCA customers receive generation services from their local CCA and receive transmission, distribution, billing, and other services from SCE. CCA customers pay CCA-specific generation rates, which vary and are partially influenced by local mandates to increase electric vehicle use, procure and maintain clean electricity portfolios that in many cases exceed state requirements for renewable generation, and achieve other local goals. CCA and other unbundled customers are also subject to several non-bypassable charges, including the PCIA, the future levels of which will be determined in SCE's 2027 ERRA Forecast proceeding.

This Application bears directly on those interests. The ERRA Trigger Balance is not limited to costs borne solely by bundled service customers; it includes the bundled share of the PABA, the balancing account that records the costs and market value of SCE's PCIA-eligible

[14] California Choice Energy Authority has eight associate member CCAs: Apple Valley Choice Energy, Energy for Palmdale's Independent Choice, Lancaster Energy, Pomona Choice Energy, Pico Rivera Innovative Municipal Energy, Rancho Mirage Energy Authority, San Jacinto Power, and Santa Barbara Clean Energy.

resources and that is shared between bundled service and departing load customers on a vintaged basis.[15] As of August 31, 2026, the overcollection that SCE reports reflects an ERRA BA overcollection of $589.493 million, offset in part by an under-collection in the PABA.[16] SCE further explains that the Final 2026 MPBs could cause "significant swings" in both the ERRA BA and PABA balances.[17] SCE also states that a decrease in the Renewable Portfolio Standard (RPS) MPB, for example, would increase the PABA under-collection borne by both bundled and departing load customers while increasing the ERRA BA overcollection credited solely to bundled service customers.[18] In the days after SCE's Trigger Application, the RPS MPB did experience an expected massive decrease,[19] and CalCCA expects the results SCE predicted for the PABA and ERRA BA balances to be reflected in SCE's forthcoming ERRA Forecast October Update.

CalCCA is an active party in A.26-05-006 and has been closely examining SCE's PCIA calculations, including its treatment of MPBs and the year-end PABA balance. Because the Commission's resolution of this Application will necessarily affect the balancing account balances and revenue requirements at issue in A.26-05-006, CalCCA and its members have a real, present, tangible, and pecuniary interest in this proceeding.

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15 Application at 6-7; SCE-01 at 3-4. SCE states that in 2026, bundled service customers were responsible for approximately 64 percent of the costs forecast to be recorded to the PABA, with departing load customers responsible for the remainder. *Id*.

16 SCE-01 at 8, 11-12.

17 *Id.* at 12-13.

18 *Ibid*.

19 Cal. Pub. Util. Comm., *Market Price Benchmark Calculations 2026* (Oct. 1, 2026) (2026 MPBs decreasing from a forecast of $62.45 to $30.88, with 2027 forecasted to be $12.69).

II. THE COMMISSION SHOULD CONSOLIDATE THIS APPLICATION WITH SCE'S 2027 ERRA FORECAST PROCEEDING

A. The Trigger Application and the 2027 ERRA Forecast Application Involve Related Questions of Law and Fact

Rule 7.4 of the Commission's Rules of Practice and Procedure permits consolidation of "[p]roceedings involving related questions of law or fact."[20] This Application and A.26-05-006 plainly meet that standard. SCE's trigger obligation arises under Public Utilities Code Section 454.5(d)(3) and the Commission's trigger decisions,[21] but the relief SCE seeks is entirely dependent on the 2027 ERRA Forecast proceeding. As SCE explains, its ERRA Trigger Balance will fall below the Trigger Point and Threshold after SCE implements its 2027 ERRA Forecast rates "because recovery of the final 2026 year-end balances that comprise the ERRA Trigger Balance are put into rates as part of the 2027 ERRA Forecast rate implementation."[22]

The factual overlap is substantial. Both proceedings will depend on: (1) the recorded and forecast 2026 year-end balances in the ERRA BA and PABA; (2) the effect of the Final 2026 MPBs on those balances; and (3) the allocation and amortization of those balances in rates that go into effect on January 1, 2027. SCE agrees that the ERRA Trigger Balance "is expected to be impacted by the issuance of the Final 2026 MPBs on October 1, 2026, and should be included in rates concurrent with the implementation of the 2027 ERRA Forecast rates, along with all of the other components that comprise the 2027 ERRA Forecast rates."[23] Those same MPBs and year-end balances will be reflected in SCE's October Update in A.26-05-006 and will be the subject of party comments and briefing in that proceeding. Indeed, SCE proposes to amortize the ERRA Trigger Balance over 12 months "consistent with the recovery period for the 2027 ERRA rates"

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20 Rule 7.4.
21 *See* Application at 1.
22 *Id*. at 1-2; *see also* SCE-01 at 1.
23 SCE-01 at 15.

that SCE anticipates.[24] There is no practical way to evaluate this Application without evaluating the very balances at issue in A.26-05-006.

B. Consolidation Promotes Administrative Efficiency and Avoids Inconsistent Outcomes

Consolidation will conserve the resources of the Commission and parties. As SCE notes, timely consolidation "promotes administrative efficiency and preserves the resources of the Commission, and parties by avoiding duplicative proceedings addressing the same or substantially related issues."[25] CalCCA agrees. Absent consolidation, parties would need to build parallel records in two concurrent proceedings concerning the same balancing accounts and the same benchmark true-ups, on overlapping expedited timelines. Consolidation allows the record developed in A.26-05-006 to support the resolution of this Application and permits parties to address both applications in the same comments, briefs, and other filings.

Consolidation also avoids the risk of inconsistent determinations. Any findings in this proceeding regarding how SCE has recorded the Final 2026 MPB true-up, or the amount and allocation of the year-end balances, would bear directly on the PCIA revenue requirement and rates adopted in A.26-05-006 because the ERRA Trigger Balance includes the bundled share of the PABA. Resolving those questions in a single decision ensures that the ERRA BA and PABA balances incorporated into bundled generation rates and PCIA rates (that parties expect to go into effect on January 1, 2027) are treated consistently.

Finally, consolidation is consistent with the purpose of the trigger mechanism, which is to "balance the utilities' need for timely cost recovery and the consequences of frequent rate adjustments on consumer behavior."[26] SCE explains that even an expedited decision on this

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[24] *Id*. at 16.
[25] Application at 11.
[26] D.02-10-062 at 71, Finding of Fact (FOF) 24.

Application would likely be adopted in December 2026, making January 1, 2027—the same date SCE expects to implement its 2027 ERRA Forecast rates—"the earliest practical opportunity to implement any resulting rate change."[27] Addressing the ERRA Trigger Balance through the January 1, 2027, rate change avoids an additional, separate rate adjustment in close proximity to that change, while still returning the overcollection to customers promptly. CalCCA therefore does not oppose SCE's request to maintain its ERRA-related rates at current levels pending the January 1, 2027, implementation of its 2027 ERRA Forecast rates, subject to the Commission's review of the final year-end balances in the consolidated proceeding.[28]

C. The Commission Has Routinely Resolved ERRA Trigger Applications Together with Pending ERRA Forecast Applications

Consolidating this Application with A.26-05-006 would follow well-established Commission practice. In 2021, the assigned Commissioner consolidated SCE's 2021 ERRA Trigger Application, A.21-10-011, with its 2022 ERRA Forecast Application, A.21-06-003, and the Commission resolved both in Decision (D.) 22-01-003.[29] In 2022, the Commission resolved SCE's 2022 ERRA Trigger Application, A.22-09-017, together with SCE's 2023 ERRA Forecast Application, A.22-05-014, in D.22-12-012.[30] The Commission has taken the same approach with Pacific Gas and Electric Company (PG&E), most recently consolidating PG&E's 2023 ERRA

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[27] SCE-01 at 14.

[28] CalCCA's position is limited to the procedural relief and timing SCE requests. CalCCA reserves the right to address the reasonableness of SCE's recorded and forecast balances, including the treatment of the Final 2026 MPBs, in the consolidated proceeding. CalCCA takes no position at this time on SCE's interpretation of Ordering Paragraph (OP) 6 of D.24-08-015 regarding customer notice under Rule 3.2. *See* SCE-01 at 6-7.

[29] D.22-01-003, *Decision Approving Southern California Edison Company's 2022 Energy Resource Recovery Account-Related Forecast Revenue Requirement and 2021 Trigger Mechanism Balance*, A.21-06-003; A.21-10-011 (Jan 13, 2022), at FOF 47-52, OP 9.

[30] D.22-12-012, *Decision Approving Southern California Edison Company's 2023 Energy Resource Recovery Account Related Forecast Revenue Requirement and 2022 Trigger Mechanism Balance*, A.22-05-014; A.22-09-017 (Dec. 1, 2022), at FOF 47-50, OP 9.

Trigger Application with its 2024 ERRA Forecast Application and resolving both in D.23-12-022.[31]

By contrast, the Commission resolved SCE's 2024 ERRA Trigger Application on a standalone basis in D.24-08-015, which authorized a mid-year refund to bundled service customers.[32] That application, however, was filed in May, leaving ample time for a separate decision and rate change well before the following year's ERRA Forecast rates took effect. Here, there is no meaningful window for a separate rate change before January 1, 2027.[33] The circumstances here align squarely with those in which the Commission has resolved trigger applications together with the pending ERRA Forecast proceeding.

D. Consolidation Is Preferable to Dismissal of the Application as Moot

SCE alternatively requests that the Commission dismiss this Application as moot in light of A.26-05-006.[34] The Commission should instead grant SCE's initial request and consolidate the proceedings. The Application is not moot: SCE's recorded ERRA Trigger Balance currently exceeds both the Trigger Point and the Trigger Threshold, and SCE states that it could not reasonably determine that the balance will self-correct within 120 days.[35] The magnitude of the balance that will ultimately be returned to customers remains uncertain and depends on the Final

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[31] D.23-12-022, *Decision Adopting the Electric Revenue Requirements and Rates Associated with the 2024 Energy Resource Recovery Account and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation and the 2024 Electric Sales Forecast for Pacific Gas and Electric Company as well as the Resolution of the 2023 Trigger Application for an Undercollection of the Energy Resource Recovery Account*, A.23-05-012; A.23-07-012 (Dec. 14, 2023), at 2-3 (noting that "[t]he 2023 Trigger was consolidated with the 2024 ERRA Forecast").

[32] D.24-08-015, *Decision Approving the Energy Resource Recovery Account Trigger Application of Southern California Edison Company*, A.24-05-025 (Aug. 1, 2024), at 1.

[33] SCE-01 at 13-14.

[34] Application at 4-5.

[35] Application at 1, 3.

2026 MPBs, which SCE describes as having the "potential for large shifts in the ERRA Trigger Balance projections."[36]

Consolidation ensures that the Commission's decision in the consolidated proceeding expressly resolves SCE's statutory trigger obligation, the reasonableness of SCE's proposal to address the ERRA Trigger Balance through 2027 rates, and the treatment of the underlying ERRA BA and PABA balances, on a record in which parties have had the opportunity to participate. Dismissal, by contrast, would leave those determinations to be made implicitly, if at all, and could invite later disputes about whether issues specific to the trigger were properly heard before the Commission in A.26-05-006. Consolidation achieves the same efficiency SCE seeks through dismissal while preserving a clear record and an explicit Commission determination.

However, the Administrative Law Judge in SCE's ERRA Forecast case has ordered SCE to "incorporate all analysis related to A.26-09-019 in its October Update in A.26-05-006" and parties in that proceeding to "address any matters from A.26-09-019 in comments and/or briefs for A.26-05-006."[37] CalCCA does not object to that instruction, and provided all parties in that proceeding accept the ALJ's ruling in that proceeding, CalCCA will not oppose the alternate relief requested or dismissing this Application as moot.

[36] SCE-01 at 13.

[37] A.26-05-006, *Email Ruling Addressing Trigger Application* (Oct. 5, 2026).

III. SCOPE, CATEGORIZATION, NEED FOR HEARINGS, AND SCHEDULE

A. Scope

CalCCA does not object to the issues SCE identifies in its Application.[38] To ensure that the consolidated proceeding fully addresses the trigger, CalCCA recommends that an amended scoping memo for the consolidated proceeding add the following issues to those already within the scope of A.26-05-006:

1) Whether SCE complied with the law and Commission orders, including D.02-10-062, D.04-12-048, D.06-06-051, D.19-12-001, and D.22-01-023 in filing its Trigger Application;
2) Whether the ERRA trigger point-related balance exceeded the trigger point, and whether it was likely that the balance would self-correct within 120 days of the trigger point balance exceedance;
3) The causes of the under-collection SCE reported (excluding reasonableness review or compliance with SCE's bundled procurement plan); and
4) Whether it is reasonable for SCE to maintain its ERRA-related rates at current levels and to address the ERRA Trigger Balance through the 2026 year-end balances incorporated into its 2027 ERRA Forecast rates, including SCE's proposed 12-month amortization period, and whether this results in just and reasonable rates.

These issues complement, and are largely subsumed within, the existing scope of A.26-05-006, which includes the reasonableness of SCE's balancing account true-ups and its calculation of the year-end PABA balance.[39]

B. Categorization and Need for Hearings

CalCCA agrees with SCE's proposed categorization of this proceeding as ratesetting.[40] CalCCA does not believe that separate evidentiary hearings on this Application are necessary at this time, provided the proceedings are consolidated, and parties may address trigger-related

[38] Application at 12 (identifying issues to be considered by reference to Section I of the Application and SCE's supporting testimony).
[39] *See* A.26-05-006, *Assigned Commissioner's Scoping Memo and Ruling* (July 22, 2026) at 2-4.
[40] Application at 10.

issues through the comments, briefs, and other filings already scheduled in A.26-05-006. CalCCA reserves the right to request hearings should material disputed facts arise regarding the ERRA Trigger Balance.

C. Schedule

SCE proposes that the consolidated proceeding follow the schedule adopted in A.26-05-006, which currently contemplates a proposed decision no later than November 24, 2026, a final decision on December 17, 2026, and implementation of updated rates on January 1, 2027.[41] CalCCA supports that approach and recommends that the Commission not adopt a separate procedural schedule for this Application.

IV. COMMUNICATIONS AND SERVICE

CalCCA consents to "email only" service and requests that the following individuals be added to the service list for A.26-09-019 on behalf of CalCCA:

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[41] Application at 11 & n.21 (citing A.26-05-006, *Assigned Commissioner's Scoping Memo and Ruling* (July 22, 2026)).

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V. CONCLUSION

For the foregoing reasons, CalCCA respectfully requests that the Commission: (1) consolidate this Application with SCE's 2027 ERRA Forecast Application, A.26-05-006, rather than dismiss it as moot; (2) issue the consolidation ruling as early as practicable, and before Comments on SCE's October Update are due; (3) add the trigger-related issues identified above to the scope of the consolidated proceeding; (4) adopt the schedule established in A.26-05-006 for the consolidated proceeding; and (5) adopt SCE's proposed categorization of this proceeding as ratesetting.

Respectfully submitted,

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