

May 28, 2020

Via Email

Administrative Law Judge Sophia Park
Sophia.Park@cpuc.ca.gov
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear Administrative Law Judge Park:

**Re: Southern California Edison Company's Comments on Draft
Resolution ALJ-381 (Agenda ID #18447)**

Pursuant to the California Public Utilities Commission's (CPUC) Rule 14.5,¹ Southern California Edison Company (SCE) submits the following comments on draft Resolution ALJ-381 (Agenda ID #18447), issued May 14, 2020, which would amend the Commission's Rules of Practice and Procedure.

SCE acknowledges and appreciates the Policy & Governance Committee's and the ALJ Division's dedication and efforts in developing the thoughtful proposed amendments set forth in Appendix A to the draft resolution. Many of the revisions SCE provided in informal comments following the April 22, 2020 webinar were incorporated into the draft resolution. The one below is new, and it was inspired by Items 6 (relating to Rules 1.13 and 1.14) and 29 (relating to Rule 15.3) in the draft resolution, in addition to SCE's recent experience with effectuating public posting requirements at a time when several of our customer service offices are closed or facing closure.

Specifically, SCE believes a modification to Rule 13.1(b) is needed with respect to the public posting requirement for rate increases and public participation hearings. SCE has typically complied with this provision by posting notice at its customer service offices, which is where customers had in the past come into contact with SCE customer service representatives. However, because of the closures over time of most of our

¹ Although the first page of the draft resolution refers to a 45-day comment period, SCE is providing its comments within the time period prescribed by Rule 14.5, which provides for comments on draft resolutions within 20 days of the date notice of the resolution appears on the Commission's Daily Calendar. This is to facilitate inclusion of the suggested modification to the Draft Resolution before it is made final.

customer service offices, and the impending closure of the rest of them,² SCE reached out to the CPUC's Public Advisor's Office in connection with our 2021 General Rate Case public participation and evidentiary hearings. We received permission to satisfy Rule 13.1(b)'s public posting requirement by (1) publishing notice on SCE's website (not currently required under the rules), and (2) sending notice to the cities and counties service list that we and other utilities use to comply with CPUC Rule 3.2(b).

As such, SCE respectfully requests that Rule 13.1(b) be modified to indicate that the requirement to post in public places may be satisfied by the utility posting notice on its website and by sending notices to the cities and counties service list. SCE's proposed modification would not only be consistent with the permission SCE has recently obtained from the Public Advisor's Office, but also would comport with the spirit of proposed Rule 15.3 (Item 29) in the draft resolution, which recognizes that the publication of the CPUC's agenda item documents on the CPUC's website obviates the need for hard copies to be available at some of the Commission's offices, including the San Diego office which has been closed for several years.

We thank you in advance for your considering this one additional change.

Sincerely,

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.

GAS/gmi:jm

cc: PolicyandGovernance@cpuc.ca.gov
Service List for ALJ-381

² As of April 10, 2020, SCE has only three customer service centers remaining, and after April 12, 2021, all customer service centers will be closed. Currently, because of the COVID-19 situation, SCE's three customer service centers are temporarily closed.