



QUARTERLY ENERGY PROCUREMENT COMPLIANCE AGREED-UPON PROCEDURES ENGAGEMENT

Southern California Edison Company
Fourth Quarter of 2024 - Advice Letter 5466-E

Utility Audits, Risk and Compliance Division
Utility Audits Branch
June 13, 2025



PUBLIC UTILITIES COMMISSION

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Transmitted via e-mail

June 13, 2025

William V. Walsh, Vice President
Energy Procurement & Management
Southern California Edison Company
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Dear William Walsh:

**Final Report Transmittal Letter – Agreed-Upon Procedures Engagement of
Southern California Edison Company’s Quarterly Energy Procurement
Compliance Report for the Period of October 1, 2024, Through December 31, 2024**

The Utility Audits Branch (UAB) of the California Public Utilities Commission (CPUC) has completed its agreed-upon procedures (AUP) engagement of Southern California Edison Company’s (SCE) Quarterly Energy Procurement Compliance Report (QCR) filed for its Fourth Quarter of 2024 in Advice Letter (AL) 5466-E. The final AUP report is enclosed.

SCE’s response to the AUP report findings are incorporated into this report. As required by Public Utilities Code Section 454.5(g), the confidential market sensitive information contained in the AUP report is redacted. We will post the final redacted audit report on our website at [Audit Reports by Industry \(ca.gov\)](https://www.cpuc.ca.gov/Audit-Reports-by-Industry).

A corrective action plan addressing the findings is required. SCE has already provided the information regarding its corrective actions planned and those responses have been included in the report. However, SCE is still required to file a supplemental AL 5466-E with amended Attachment B and the Greenhouse Gas (GHG) Emission Deals work paper of its QCR by June 27, 2025. Once SCE submits these documents, no further actions will be required.

We appreciate SCE’s assistance and cooperation during the engagement. If you have any questions regarding this report, please contact Tracy Fok, Program and Project Supervisor, at (415) 703-3122 tracy.fok@cpuc.ca.gov.

Sincerely,

Angie Williams

Angie Williams, Director
Utility Audits, Risk and Compliance Division
cc: See next page

William V. Walsh, Vice President
Energy Procurement & Management
Southern California Edison Company
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A digital copy of this report can be found at:

[Audit Reports by Industry \(ca.gov\)](#)

You can contact our office at:

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I. INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES

The Utility Audits Branch (UAB) of the California Public Utilities Commission (CPUC) performed the agreed-upon procedures (AUP) enumerated in Procedures and Findings section of this report for Southern California Edison Company (SCE or the utility) energy procurement compliance reporting period of October 1, 2024, through December 31, 2024, (Q4 2024.) These procedures were agreed to between CPUC's Energy Division (ED) and UAB solely to assist ED in determining whether the three large investor-owned electric utilities are in compliance with certain energy procurement-related state laws and CPUC energy procurement directives. SCE is one of these utilities¹ and is responsible for complying with the energy procurement requirements.

ED engaged UAB to perform this AUP engagement. UAB is required to be independent and to meet other ethical responsibilities in accordance with the relevant ethical requirements related to the AUP engagement. We conducted this engagement in accordance with attestation standards established by the generally accepted government auditing standards (GAGAS). The sufficiency of the AUP procedures is solely the responsibility of ED. ED has agreed to and acknowledged that the procedures performed are appropriate for the intended purpose of the AUP engagement. Consequently, we make no representation regarding the sufficiency of the procedures described herein either for the purpose for which this report has been requested or for any other purpose. The results of the engagement are detailed in the Procedures and Findings section of this report.

We were not engaged to, and did not, perform an examination or review of the subject matter, the objective of which would be the expression of an opinion on SCE's compliance with the energy procurement-related state laws and the CPUC's energy procurement directives. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to ED.

The purpose of this report is to communicate to ED the utility's compliance and the results of the AUP performed. The report may not be suitable for any other purposes. The procedures performed may not address all the items of interest to users other than ED and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

¹ Pacific Gas & Electric Company and San Diego Gas and Electric Company are the other two electric utilities subject to the agreed-upon procedures engagements.

In accordance with CPUC Decision (D.) 12-04-046, Ordering Paragraph (OP) 13, this report shall be made public. As required by Public Utilities (PU) Code Section 454.5(g), the confidential market sensitive information contained in the AUP report is redacted. The redacted report can be found on the CPUC public website through the following link: [Audit Reports by Industry \(ca.gov\)](#).

Angie Williams

Angie Williams, Director
Utility Audits, Risk and Compliance Division

II. PROCEDURES AND FINDINGS

Below are the results of the AUP performed and associated findings. The sufficiency of these procedures is solely the responsibility of ED. Thus, UAB makes no representation regarding the sufficiency of the following procedures used for this engagement for the purposes for which this report has been requested.

A. Transaction Reconciliation/Analysis

1. Inspected whether the utility's Q4 2024 electric physical (and transmission) transaction details in Attachment A² contained any competitive solicitation transactions, requiring performance of the audit procedures under Section F - Request for Offers (RFO) contracts.

Finding: We found [REDACTED] RFO electric physical contracts reported in Attachment A that required performance of the AUP indicated in Section F of this report.

2. Reconciled to determine whether the utility's Q4 2024 electric physical transaction details in Attachment A agreed to the corresponding transaction summary in Attachment C. Performed mathematical re-calculation and an analysis of 100 percent of transactional average prices, volumes, and notional values for the detection of a reporting anomaly.

Finding: We found no exceptions as a result of this procedure.

3. Reconciled to determine whether the utility's Q4 2024 electric financial transaction details in Attachment A agreed to the corresponding transaction summary in Attachment C. Performed mathematical re-calculation and an analysis of 100 percent of transactional average prices, volumes, and notional values for the detection of a reporting anomaly.

Finding: We found no exceptions as a result of this procedure.

4. Reconciled to determine whether the utility's Q4 2024 gas physical transaction details in Attachment A agreed to the corresponding transaction summary in Attachment D. Performed mathematical re-calculation and an analysis of 100 percent of transactional average prices, volumes, and notional values for the detection of a reporting anomaly.

Finding: We found no exceptions as a result of this procedure.

5. Reconciled to determine whether the utility's Q4 2024 gas financial transaction details in Attachment A agreed to the corresponding transaction summary in Attachment D. Performed mathematical re-calculation and an analysis of 100 percent of transactional average prices, volumes, and notional values for the detection of a reporting anomaly.

Finding: We found no exceptions as a result of this procedure.

² All references to attachments in the list of Procedures and Findings are to the attachments filed with the utility's Quarterly Compliance Report subject to this engagement.

6. Reconciled to determine whether the utility's Q4 2024 transport, storage, park and lend transaction details in Attachment A agreed to the corresponding transaction summary in Attachment D.

Finding: We found no exceptions as a result of this procedure.

7. Compared the utility's spot market (i.e., Day-Ahead, Hour-Ahead, and Real-Time energy) electric physical purchases to its monthly retail energy needs, or energy physical purchase requirement, to determine whether the spot market purchases exceed five percent of the monthly retail energy needs, or energy physical purchase requirement.

Finding: We found no exceptions as a result of this procedure.

B. Quarterly Compliance Report (QCR)

1. Inspected QCR advice letter filing, including the attachments of supporting documentation, to determine whether the filing was accurate and complete.

Finding #1: SCE failed to demonstrate compliance with D.02-10-062, Appendix B, and PU Code Section 581. SCE incorrectly reported vintage years for the [REDACTED] transactions executed with [REDACTED] as [REDACTED] instead of [REDACTED]. For additional information about the finding, please see Finding #1 at procedure D.5 listed below.

SCE's Response: See D.5.

Finding #2: SCE failed to demonstrate compliance with D.02-10-062, Appendix B, and PU Code Section 581. SCE incorrectly reported the collateral type/credit mechanism as [REDACTED] for [REDACTED] instead of [REDACTED] in Attachment B of its QCR. For additional information about the finding, please see Finding #2 at procedure F.7 listed below.

SCE's Response: See F.7.

2. Identified any of the utility's authorized decision-makers that were not listed in QCR.
3. Inspected QCR and associated attachments to determine whether the utility provided its descriptions of and justifications for its procurement processes used to select the transactions.

Finding: We found no exceptions as a result of this procedure.

4. Inspected QCR and associated attachments to determine whether the utility explained or justified the timing of its transactions.

Finding: We found no exceptions as a result of this procedure.

5. Inspected QCR and associated attachments to determine whether the utility discussed the system load requirements/conditions underlying the need for the quarter's transactions.

Finding: We found no exceptions as a result of this procedure.

6. Inspected QCR and associated attachments to determine whether the utility provided a copy of any data of forecasts used by the utility to analyze transactions.

Finding: We found the utility provided a copy of forecast data used to analyze transactions.

7. Inspected QCR and associated attachments to determine whether the utility provided a copy of each of the utility's procurement contracts reported in Attachment H – Contracts Executed/Contracts Amended.

Finding: We found no exceptions as a result of this procedure.

8. Inspected QCR and associated attachments to determine whether the utility provided a reasonable number of analyses, as requested by CPUC or the Procurement Review Group (PRG) and provided the resulting outputs.

Finding: We found no exceptions as a result of this procedure.

9. Inspected QCR and associated attachments to determine whether the utility's QCR included its briefing package provided to the ultimate decision maker.

Finding: We found no exceptions as a result of this procedure.

10. Inspected QCR and associated attachments to determine whether the utility provided the break-even spot prices equivalent to the contracts.

Finding: We found no exceptions as a result of this procedure.

11. Inspected QCR and associated attachments to determine whether the utility provided average price information for non-standard transactions.

Finding: We found no exceptions as a result of this procedure.

12. Inspected QCR and associated attachments to determine whether the utility provided California System Independent Operator (CAISO) procurement information in the utility's QCR.

Finding: We found no exceptions as a result of this procedure.

C. Strong Showing Justification

1. Inspected Attachment A for any transactions subject to strong showing justification and inspected Attachment M – Transactions Subject to Strong Showing to determine whether the transactions were properly justified in Attachment M.

Finding: We found no exceptions as a result of this procedure.

2. Compared the price of bilateral contracts for non-standard products in Attachment A, which are waived from strong showing justification under D.03-06-067, OP 3(d), to the prices of relevant market supporting documentation to determine whether the bilateral contract prices are reasonable based on available and relevant market data. Compared the buy and sell average price in Attachment A to the market high and low prices to ensure a reasonable deal was completed.

Finding: We found no exceptions as a result of this procedure.

3. Inspected Attachment H for any transactions subject to strong showing justification and inspected Attachment M to determine whether the transactions were properly justified in Attachment M.

Finding: We found no exceptions as a result of this procedure.

4. Compared the price of bilateral contracts for non-standard products in Attachment H, which are waived from strong showing justification under D.03-06-067, OP 3(d), to the prices of relevant market supporting documentation to determine whether the bilateral contract prices are reasonable based on available and relevant market data. Compared the buy and sell average price in Attachment H to the market high and low prices to ensure a reasonable deal was completed.

Finding: We found no exceptions as a result of this procedure.

5. Inspected other bilateral transactions in QCR for any transactions subject to strong showing justification and inspected Attachment M to determine whether the transactions were properly justified in Attachment M.

Finding: We found no exceptions as a result of this procedure.

6. Compared the prices of other bilateral contracts for non-standard products that are waived from strong showing justification under D.03-06-067, OP 3(d) to the prices of relevant market supporting documentation to determine whether the bilateral contract prices are reasonable based on available and relevant market data. Compared the buy and sell average price for other transactions to the market high and low prices to ensure a reasonable deal was completed.

Finding: We found no exceptions as a result of this procedure.

D. Bilateral and Broker Contracts

1. Inspected PRG meeting materials to determine whether the utility consulted with its PRG for any contracts with terms over one calendar quarter before they were executed.

Finding: We found no exceptions as a result of this procedure.

2. Inspected counterparties' credit supporting documentation to validate that the contracts were executed bilaterally with investment-grade counterparties or non-investment grade counterparties that were supported with credit protection such as surety bonds, guarantee, collateral, and net provision.

Finding: We found no exceptions as a result of this procedure.

3. Inquired with the utility as to whether the contracts had any impact on the overall Time to Expiration Value at Risk (TeVAR).

Finding: We found no contracts had any impact on the overall TeVAR.

4. Identified any contract related to a new fossil-fuel generation or Power Purchase Agreement (PPA) that was less than five years.

Finding: We did not identify any contract related to a new fossil-fuel generation or PPA that was less than five years.

5. Traced and agreed all bilateral contracts executed during the quarter to supporting documentation ensuring that they were correctly and completely reported in attachments of the utility's QCR.

Finding #1: SCE failed to demonstrate compliance with D.02-10-062, Appendix B, and PU Code Section 581. SCE incorrectly reported vintage years for the [REDACTED] transactions executed with [REDACTED] as [REDACTED] instead of [REDACTED] respectively, as outlined in the table below:

Counterparty (Contract Number)	Execution Date	Product	Reported Vintage Year	Audited Vintage Year
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

SCE's Response:

On May 27, 2025, SCE stated:

SCE inadvertently reported vintage years for [REDACTED] transactions executed during Q4 2024, as Year [REDACTED]. The vintage years should be [REDACTED]. SCE's corrective action will be taken in the form of reinforcing quality-check processes to ensure that SCE includes accurate information in future QCRs.

E. Request for Offers (RFO) Process

We requested and inspected copies of RFO documents, criteria, evaluation supporting documentation, bids received, and other relevant supporting documentation and performed the following procedures:

1. Inquired with the utility and inspected evidence to determine whether the utility developed its RFO bid documents under oversight of its Independent Evaluator (IE), vetted through its PRG and any differences were resolved by ED staff in advance of public issuance of the RFO bid document.

Finding: We found no exceptions as a result of this procedure.

2. Inquired with the utility and inspected evidence to determine whether the utility consulted with its IE, PRG and ED to outline its plans and solicited feedback prior to drafting RFO bid document so that the RFO process was improved by the identification of data gaps, confirmation of the fairness of the confidential components of the RFO, and in compliance with the letter and spirit of CPUC policies on procurement practices.

Finding: We found no exceptions as a result of this procedure.

3. Inquired with the utility and inspected evidence to determine whether the RFO process was competitive and consistent with the spirit of competitive solicitation.

Finding: We found no exceptions as a result of this procedure.

4. Inquired with the utility and inspected evidence to determine whether the utility addressed any concerns raised by its PRG members, ED staff, and IE regarding the RFO.

Finding: We found no exceptions as a result of this procedure and outlined additional information relating to procedure E.4 below.

On February 19, 2025, the Public Advocate Office (PAO) filed a protest against a [REDACTED] [REDACTED] executed with [REDACTED] that was reported in SCE's Q4 2024 QCR advice letter filing for approval.

PAO asserted that SCE did not use recent market data to develop reasonable forecasted market prices for calculating Net Present Value (NPV), a key factor in selecting winning contracts. PAO contended that SCE used outdated [REDACTED] which incorporated inaccurate and inflated data. As a result, PAO argued that the contract prices executed with [REDACTED] were unreasonable and should be rejected by the CPUC and removed from the QCR.

On February 26, 2025, SCE filed a rebuttal in response to PAO's protest asserting that PAO was mistaken regarding SCE's use of the [REDACTED] as the crucial component of the NPV calculation. SCE affirmed that its NPV analysis was instead based on recent market data and submitted supporting evidence to substantiate its position.

On March 27, 2025, UAB conducted a meeting with ED and PAO to discuss the issue. ED requested UAB to conduct a review of SCE's 2024 Q3Q4 RA RFO process in response to the PAO's protest and SCE's subsequent rebuttal.

UAB's additional review as requested by ED included performing the following additional AUPs supplementing procedures as follows:

- a. Inspected source documentation to determine whether the market data cited in SCE's rebuttal was the actual data used in its NPV calculation for selecting the RA contract executed with [REDACTED].

Finding: We found the market data included in SCE's rebuttal was indeed the same data used in SCE's NPV analysis for the contract award to Sunrise.

- b. Inspected supporting documentation to determine whether the aforementioned market data was supported by verifiable source documentation.

Finding: We found this market data was fully substantiated by supporting source documentation.

- c. Inquired with the utility and inspected the methodology used by SCE to perform its NPV analysis and evaluated whether the methodology was correctly applied.

Finding: We found SCE's NPV methodology involved calculating the average market quotes (benefit) minus the bid prices (cost) and then discounting the difference at the current interest rate to derive NPV. The methodology was correctly applied to select winning contracts.

- d. Compared whether the broker quotes presented on Slide 18/25 of October 25, 2024, PRG meeting presentation were consistent with the referenced market data and the contract price with [REDACTED]

Finding: We found the broker quotes were consistent with both the referenced market data and [REDACTED] contract price.

- e. Inspected supporting documentation to determine whether the broker quotes were supported by source documentation.

Finding: We found the broker quotes were supported by appropriate source documentation.

- f. Inspected and evaluated all relevant supporting data and information to determine whether the contract executed with [REDACTED] was based on recent market data and not on the [REDACTED]. Additionally, determined whether the contract price was consistent with market broker quotes and whether the contract was valid and justified for the CPUC's approval.

Finding: We found SCE based its NPV analysis on recent market data, not on its [REDACTED] prices. Additionally, we found the contract price with [REDACTED] is consistent with the market broker quotes. We found no evidence opposing that the contract executed with [REDACTED] appears valid and justified for the CPUC's approval.

5. Inquired with the utility and inspected evidence to determine whether the RFO bid criteria included the measures recommended by CPUC and were consistent with the CPUC's requirements.

Finding: We found no exceptions as a result of this procedure.

6. Inquired with the utility and inspected evidence to determine whether the RFO bid criteria were clearly described and defined.

Finding: We found no exceptions as a result of this procedure.

7. Inquired with the utility and inspected evidence to determine whether the rationale for the RFO bid criteria was clearly explained.

Finding: We found no exceptions as a result of this procedure.

8. Inquired with the utility and inspected evidence to determine whether project viability was part of the RFO bid criteria.

Finding: We found no exceptions as a result of this procedure.

9. Inquired with the utility and inspected evidence to determine whether the winning contract met the utility's RFO evaluation criteria.

Finding: We found no exceptions as a result of this procedure.

10. Inquired with the utility and inspected evidence to determine whether the utility's decisions to accept and reject offers are clearly provided.

Finding: We found no exceptions as a result of this procedure.

11. Inquired with the utility and inspected evidence to determine whether the utility presented its RFO candidates in its PRG meetings for feedback from PRG members, ED staff, and IE.

Finding: We found no exceptions as a result of this procedure.

12. Inquired with the utility and inspected evidence to determine whether the utility created any false barriers to participation in the RFO or to attempt limiting the competitive process by manipulating the RFO products and/or process.

Finding: We found no exceptions as a result of this procedure.

13. Inquired with the utility and inspected evidence to determine whether the utility issued RFO seeking bids for both PPAs and utility build bids.

Finding: We found no exceptions as a result of this procedure.

14. Inquired with the utility and inspected evidence to determine whether the utility considered the use of Brownfield sites first and took full advantage of their location before it considered building new generation on Greenfield site in those cases when the RFO solicited fossil-fuel generation contracts less than five years.

Finding: We found that the RFO did not solicit fossil-fuel generation contracts less than five years.

15. Inquired with the utility and inspected evidence to determine whether the RFO was evaluated by an IE regardless of contract duration if the RFO involved affiliates or utility bidders.

Finding: We found no exceptions as a result of this procedure.

16. Inquired with the utility and inspected evidence to determine whether the utility recognized the effects of debt equivalence when comparing PPA against PPAs in their bid evaluations, but not when a utility-owned generation (UOG) project was being considered, in those cases when the RFO solicited PPA with a term of less than five years.

Finding: We found that the RFO did not solicit PPA with a term of less than five years.

F. Request for Offers (RFO) Contracts

1. Inspected the utility's Q4 2024 electric physical transactions included in Attachment A to determine if there were any RFO or other competitive solicitation transactions.

Finding: We found [REDACTED] electronic solicitation electric physical transactions reported in Attachment A as a result of this procedure. We performed the required AUP for these transactions along with other competitive solicitation contracts reported in Attachment H following the procedures in this section.

2. Inspected PRG meeting documentation to determine whether the utility consulted with its PRG for any contracts with terms that exceeded one calendar quarter before they were executed.

Finding: We found no exceptions as a result of this procedure. .

3. Inspected the utility's IE report to determine whether IE evaluated any contracts executed with affiliate(s) or any contracts with terms greater than two years.

Finding: We found no exceptions as a result of this procedure.

4. Inspected counterparties' credit supporting documentation to validate that the contracts derived from the RFO selection process were executed with investment-grade counterparties or non-investment grade counterparties that were supported with credit protection such as surety bonds, guarantee, collateral, and net provision.

Finding: We found no exceptions as a result of this procedure.

5. Inquired with the utility as to whether the contracts had any impact on the overall TeVAR.

Finding: No contracts had any impact on the overall TeVAR.

6. Identified any contract related to a new fossil-fuel generation or PPA with a term of less than five years.

Finding: We did not identify any contract related to a new fossil-fuel generation or PPA with a term of less than five years.

7. Traced and agreed all RFO contracts executed during the quarter to supporting documentation to ensure that they were correctly and completely reported in attachments of the utility's QCR.

Finding #2: SCE failed to demonstrate compliance with D.02-10-062, Appendix B, and PU Code Section 581. SCE incorrectly reported the collateral type/credit mechanism as [REDACTED] for [REDACTED] instead of [REDACTED] in Attachment B of its QCR.

SCE's Response:

On May 6, 2025, SCE stated:

SCE inadvertently reported the collateral type/credit mechanism for [REDACTED] as [REDACTED] on Attachment B. The collateral type/credit mechanism listed on Attachment B for this counterparty should be [REDACTED]. SCE's corrective action will be taken in the form of reinforcing quality-check processes to ensure that SCE includes correct and accurate information in future QCRs.