

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

Application of San Diego & Electric Company (U902E) for Authority to Implement Optional Pilot Program to Increase Customer Access to Solar Generated Electricity.	Application 12-01-008 (Filed January 17, 2012)
In the Matter of the Application of Pacific Gas and Electric Company (U39E) to Establish a Green Option Tariff.	Application 12-04-020 (Filed April 24, 2012)
In the Matter of the Application of Southern California Edison Company (U338E) for Approval of Optional Green Rate.	Application 14-01-007 (Filed January 10, 2014)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL GREEN TARIFF
SHARED RENEWABLES PROGRAM PROGRESS REPORT**

JANET S. COMBS
VIVIAN A. LE

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6093
Facsimile: (626) 302-3990
E-mail: Vivian.Le@sce.com

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TARIFF SHARED RENEWABLES PROGRAM PROGRESS REPORT**

I.

INTRODUCTION

Pursuant to Ordering Paragraph (“OP”) 10 of California Public Utilities Commission (“Commission”) Decision (“D.”) 15-01-051 (the “Decision”), Southern California Edison Company (“SCE”) respectfully submits its Annual Green Tariff Shared Renewables (“GTSR”) Progress Report (“Annual Report”).

II.

BACKGROUND

On September 28, 2013, Governor Brown signed Senate Bill (“SB”) 43 into law.¹ SB 43 enacted the GTSR Program, a 600 megawatt (“MW”) statewide program that allows participating utilities’ customers – including local governments, businesses, schools, homeowners, municipal customers, and renters – to meet up to 100 percent of their energy usage with generation from eligible renewable energy resources. As required by SB 43, all of the Investor-Owned Utilities’ (“IOUs”)² filed applications with the Commission requesting approval of GTSR programs consistent with statute.

On January 29, 2015, the Commission adopted D.15-01-051, implementing a GTSR Program framework and approving the IOUs’ applications with modifications. Among other things, the Commission divided the GTSR Program’s statewide limitation of 600 MW of customer participation among the IOUs. SCE’s share of the statewide limitation is 269 MW.

On May 13, 2015, SCE submitted three advice letters: (1) Advice 3219-E, referred to as the Customer Service Implementation Advice Letter (“CSIAL”), which included a proposed rate design methodology in compliance with the requirements of the Decision and included a calculation of GTSR Program rates for 2015; (2) Advice 3220-E, referred to as the Marketing Implementation Advice Letter (“MIAL”); and (3) Advice 3218-E, referred to as the Joint Procurement Implementation Advice Letter (“JPIAL”), which was jointly filed by the IOUs. On October 1, 2015, the Commission adopted Resolution E-4734 (the “Resolution”), which approved the CSIAL and JPIAL, as modified by the Resolution, and adopted SCE’s rate design methodology and 2015 GTSR Program rates as proposed.³

¹ SB 43 was codified in California Public Utilities Code Section 2831 *et seq.*

² The IOUs include SCE, Pacific Gas and Electric Company, and San Diego Gas & Electric Company.

³ On October 21, 2015, SCE filed Advice 3218-E-A (JPIAL update), 3219-E-A (CSIAL update), and 3297-E (SCE-specific JPIAL tariffs) to comply with the Resolution.

The GTSR Program structure approved by the Commission consists of two elements: (1) a green tariff option (called the “Green Rate” or “GR” by SCE), allowing customers to source a greater share of their energy needs with renewables, and (2) an enhanced community renewables (“ECR” or “CR”) option (called the “Community Renewables Program” by SCE), allowing customers to subscribe to renewable energy from community-based projects.⁴

OP 10 of the Decision directs SCE to file several reports as discussed in Section 8 of the Decision. One of these reports is the Annual Report, which is due on March 15, 2016, 2017, 2018 and 2019 covering the required information for the previous calendar year. SCE filed its Interim Annual GTSR Program Progress Report (the “Interim Report”) on August 17, 2015, and subsequent Annual GTSR Program Progress Reports on March 15, 2016, and March 15, 2017. This Annual Report for the 2017 calendar year covers the following topics:⁵

- A. Enrollment Reporting, including “available capacity” data at the most detailed level feasible, updated monthly, and work to increase the precision of the information over time.
- B. One page summary tracking the amount and cost of generation transferred between the Renewables Portfolio Standard (“RPS”) and GTSR Program.
- C. GTSR Revenue and Cost Reporting summary.
- D. Summary of advisory group or advising network activities, including information regarding frequency of meetings, topics discussed, and any other relevant information.
- E. Marketing Report, containing the elements listed in Section 7 of the Decision.
- F. Community Choice Aggregation (“CCA”) Code of Conduct report, including, if applicable, a summary of any marketing or lobbying efforts that are, or could reasonably be interpreted to be, subject to the CCA Code of Conduct.

⁴ See D.15-01-051 at 3-4.

⁵ See *id.*, at 141-142.

- G. Supplier diversity.
- H. Summary of California Alternate Rates for Energy (“CARE”) enrollment figures including: location; location of CARE customers in relation to areas eligible for Environmental Justice Projects and in relation to planned or existing Environmental Justice Projects.
- I. Reports of fraud or misleading advertisements received through meetings with an advisory group of advising network.
- J. Summary of enrollment figures for low-income customers and subscribers who speak a language other than English at home, if customer profile information is available.

Pursuant to D.15-01-051, SCE respectfully files this Annual GTSR Report.

III.

REPORT COMPONENTS

A. Enrollment Reporting

At the end of 2017, SCE had 796 active accounts representing an overall program retention rate of 86 percent. From January 1, 2017 to December 31, 2017, SCE enrolled a total of 321 customers in the GR program, of which 315 were residential and 6 were non-residential.

2017 GTSR Enrollment

Customer Type	50% Subscription	100% Subscription	Total Customers Enrolled
Residential	72	243	315
Non-Residential	2	4	6
			321

During this period, eight accounts changed subscription rate levels. Of those eight accounts, six increased subscription rates from 50 percent to 100 percent and two decreased from 100 percent to 50 percent.

In 2017, SCE lost 114 customers due to de-enrollments and closed accounts. Three of the residential customers were automatically removed from the program due to CCA conversions. CCA customers are unable to participate in the GR program.

SCE has no enrollments in the CR Program.

2017 GTSR Retention Rate

Customer Type	Customers De-Enrolled in 2017	Closed Accounts in 2017	Retention Rate
Residential	23	88	88%
Non-Residential	0	3	99%

The Decision requires “available capacity” data at the most detailed level feasible, updated monthly, to be reported with precision of the information increasing over time.

In D.15-01-051, the Commission set a target capacity for SCE’s GTSR Program of 269 MW, inclusive of 45 MW reserved for Environmental Justice (“EJ”) facilities. Because no capacity was procured in 2017 for the GTSR program, the current solar capacity procured specifically for the GR and CR components of the GTSR Program presented in Table 1.1 remains unchanged from SCE’s GTSR Annual Report for 2016. Customer demand for SCE’s Green Rate program will be met through the Interim Pool, in all or in part, until sufficient Green Rate resources are online.

TABLE 1.1: GTSR PROCUREMENT (in MW)

Category	Target Capacity	GR Procured from GTSR Launch through Dec. 31, 2017	CR Procured from GTSR Launch through Dec. 31, 2017	GR Online through Dec. 31, 2017	CR Online through Dec. 31, 2017	Capacity Remaining as of Dec. 31, 2017
Unrestricted	224	60				164
Reserved for EJ	45					45
Total	269					209

Capacity Remaining as used in Table 1.1 is defined as available capacity, calculated as Target Capacity less GR Procured from GTSR Launch (February 25, 2016) through Dec. 31, 2017 less CR Procured from GTSR Launch through Dec. 31, 2017. No capacity was procured for either GR or CR in 2017.

Customer enrollment data for the GTSR Program for 2017 is presented in Tables 2.1 and 2.2. They provide subscribed capacity for the GR and CR programs.

TABLE 2.1: 2017 GTSR ENROLLMENT (in MW)

Category	GR Enrolled Capacity (MW)	CR Enrolled Capacity (MW)	Total by Customer Type (MW)
Residential Customers	4.35	0	4.35
Non-Residential Customers	1.28	0	1.28
Total by Program	5.63	0	5.63

**TABLE 2.2: 2017 GTSR ENROLLMENT BY MONTH
& CUMULATIVE ENROLLMENT (in MW)**

Month	GR Enrolled Capacity			CR Enrolled Capacity			Total GTSR Enrolled by Month
	Residential Customers	Non-Residential Customers	Total GR by Month	Residential Customers	Non-Residential Customers	Total CR by Month	
January	0.35	0.10	0.45	0	0	0	0.45
February	0.37	0.11	0.48	0	0	0	0.48
March	0.33	0.10	0.43	0	0	0	0.43
April	0.32	0.10	0.42	0	0	0	0.42
May	0.31	0.10	0.41	0	0	0	0.41
June	0.35	0.10	0.45	0	0	0	0.45
July	0.37	0.11	0.48	0	0	0	0.48
August	0.39	0.11	0.50	0	0	0	0.50
September	0.42	0.12	0.54	0	0	0	0.54
October	0.37	0.11	0.48	0	0	0	0.48
November	0.37	0.11	0.48	0	0	0	0.48
December	0.40	0.11	0.51	0	0	0	0.51
2017	Total GR Residential: 4.35	Total GR Non-Residential: 1.28	Total GR: 5.63	Total CR Residential: 0	Total CR Non-Residential: 0	Total CR: 0	5.63
2016	Total GR Residential: 1.65	Total GR Non-Residential: 0.76	Total GR: 2.41	Total CR Residential: 0	Total CR Non-Residential: 0	Total CR: 0	2.41
Total	Total GR Residential: 6.00	Total GR Non-Residential: 2.04	Total GR: 8.04	Total CR Residential: 0	Total CR Non-Residential: 0	Total CR: 0	8.04
	Total GR Enrollment: 6.00			Total CR Enrollment: 2.04			

The capacity shown above in Tables 2.1 and 2.2 is through December 31, 2017. Capacity is defined as coincident system peak load.

B. The Amount and Cost of Generation Transferred between the RPS and GTSR Program

There was no generation transferred from RPS to the GTSR in 2017.

C. GTSR Revenue and Cost Reporting

In 2017, SCE recorded approximately \$352,002 in billed revenues, net of franchise fees and uncollectibles (FF&U)⁶, from customers served under the GTSR-GR tariff option. SCE recorded \$335,398 in interim pool resources expenses to procure power for the Green Rate program. Both the billed revenues and expenses were recorded to SCE’s Green Tariff Shared Renewables Balancing Account “(GTSRBA”).

Table 3.1 below summarizes the revenues and expenses recorded in the GTSRBA for 2017.

**TABLE 3.1: GREEN TARIFF SHARED RENEWABLES BALANCING ACCOUNT
January through December 2017**

	<u>Total</u>
(a) Beginning Balance	(\$799)
(b) Renewable Power Rate (RPR)	(\$356,089)
(c) Franchise Fees	\$3,239
(d) <u>Uncollectibles</u>	<u>\$848</u>
(e) Net RPR Revenue	(\$352,003)
(f) Total RPR Expenses	\$335,398
(g) Interest	<u>(\$67)</u>
(h) Ending Balance (a+e+f+g)	(\$17,470)

Cost Reporting:

To date, SCE has incurred \$911,145 in expenses in order to develop, implement, and market the GTSR program, of which \$53,135 incurred in 2017. Labor corrections from 2016 in

⁶ These revenues were recorded in Renewable Power Rate (“RPR”) subaccount in the Green Tariff Shared Renewables Balancing Account (“GTSRBA”), pursuant to Preliminary Statement Part GG, section 3.a. Administrative and marketing revenues and costs are recorded in stand-alone memorandum accounts.

the amount of \$30,638 helped to offset some of the 2017 administrative costs, as noted in Table 3.2 below. The GTSR program expenses can be broken down into three major categories: Green Rate operations and maintenance; Community Renewables operations and maintenance; and Administrative costs, which include information technology, billing system and customer call center operation costs, and Green-e certification. The recorded expenses, by category, are shown in Table 3.2. The expenses were recorded into a memorandum account in accordance with D.15-01-051. SCE implemented tracking of administrative and marketing costs through the use of internal order numbers in order to maintain non-participant indifference of such costs.

TABLE 3.2: TOTAL AMOUNT SPENT ON GTSR PROGRAM

Green Tariff Shared Renewables Memorandum Accounts		
January through December 2017		
Description		Amount
Beginning Balance		\$850,759
Beginning Balance Adjustment*		\$4,481
Green Rate O&M		\$53,135
Community Renewables O&M		\$14,201
Administrative		\$19,200
Labor Corrections		(\$30,638)
Interest		\$8
Ending Balance		\$911,145

*The figure for the Beginning Balance used in this table derives from SCE’s latest Corporate Finance report. The Beginning Balance Adjustment is the difference between the beginning balance figures from Corporate Finance and SCE’s GTSR Customer Service Group’s internal reporting, the latter of which reflects the most recent and current number.

D. Advising Network Activities

SCE did not hold an information session with a Small Business Advisory Panel this year, but participated in numerous other Advising Network Activities, as described in this section.

In 2017, SCE participated in numerous tradeshows, conferences, and events throughout its service territory as an exhibitor. Through these events, SCE provided thousands of customers and industry professionals with educational materials on going solar and met with those looking to exchange ideas, discuss lessons learned, and learn about solutions in the power and renewable energy industry. Some of the conferences SCE attended include Solar Power International; VerdeXchange; Net Zero 17 Energy, Water, and Waste Conference, California University of Riverside Solar Conference; California Association of Community Managers Expo; and the California Realtor Association Expo. An important element in SCE's continued outreach was to provide both residential and commercial customers with clean energy options and sustainable practices that included fact sheets on SCE's Green Rate and Community Renewables.

As a leader in the solar industry, SCE was invited to speak at local events to educate its customers and industry professionals about its renewable portfolio, which included the GTSR program. SCE spoke at local clean energy non-profit meetings, local government and community events such as Chino Valley Chamber of Commerce, "An Evening with SCE" in the City of Claremont, the San Gabriel Valley Council of Governments 2017 General Assembly, and the 2017 Women's Forum. In October, SCE met with staff members from Santa Barbara County, City of Santa Barbara, Carpinteria, and Goleta to present the Green Tariff Shared Renewables program details as a potential pathway for them to pursue their renewable goals.

E. Marketing

On May 13, 2015, SCE filed Advice 3220-E, the GTSR Program MIAL. On August 14, 2015, SCE filed a supplemental advice letter, Advice 3220-E-A, which was approved by the Commission on October 6, 2015. On October 28, 2016, SCE filed Advice 3496-E to update its MIAL for 2017, which was approved by the Commission on November 27, 2016. SCE filed Advice 3678-E on October 16, 2017 to update its MIAL for 2018, and filed a supplemental Advice 3678-E-A on December 7, 2017. As of the date of this filing, Advices 3678-E and 3678 E-A are pending.

2017 Strategic Approach:

With the successful launching of the GTSR program in February 2016, so ensued the Marketing, Education and Outreach (“ME&O”) plan. The plan was designed to drive customer awareness and participation in the GTSR program and encourage behavior changes that save energy, reduce greenhouse gas emissions associated with electricity, and support clean energy solutions. SCE researched and identified areas in its service territory that SCE believed best targeted potential GTSR customers, namely, the largest SCE segment with the strongest green and technology affinity, as well as the greatest affordability measures, known as the Green Elite segment. SCE directed its marketing efforts toward this Green Elite segment and other smaller segments likely to subscribe to the GTSR program through broad based and targeted marketing channels. SCE conducted direct mail and email campaigns to both residential and business customers, and also conducted digital banner ads and social media campaigns. Despite these costly marketing efforts, SCE had approximately 600 active customers enrolled at the end of 2016.

In 2017, SCE used the previous year’s messaging approach of instilling program enrollment benefits of helping the environment, educating customers on clean energy options and sustainable practices, and setting a target preference to those most likely to become participants. Efforts employed were low cost/no cost methods to mitigate future impact for GTSR existing customers. Throughout the year, SCE conducted a variety of recruitment activities by way of trying to increase enrollment effectiveness without increasing costs. The activities are detailed as follows.

E-Mail Campaign:

SCE conducted two email campaigns targeting a total of 71,452 residential customers. SCE identified recipients through customer segmentation efforts, and selected Green Elites and Connected customers in Climate Zones 6, 8 and 9. The email campaigns resulted in 7 residential enrollments (.009 percent conversion).

Social Media:

SCE's social media campaign included social posts to both Facebook and Twitter. Social media helped support GTSR communications by using paid social targeting options via the SCE Rates Communications Marketing campaign. The primary goal of this channel was to create broad based awareness of the different rates that SCE has to offer to customers, including the Green Rate option. The campaign was not designed to track enrollments.

Renewable Conferences & Events:

SCE highlighted the GTSR program at numerous conferences and events to increase adoption, which are cited under "Advising Network Activities" above. Promotions included presentations, fact sheets, paper enrollment forms, etc., and customers were encouraged to visit SCE's website to enroll in the program.

Welcome Kits:

Throughout the year, SCE distributed 598 welcome kits to date in accordance with Advice Letter 3220-E. These kits included a welcome letter as well as the requisite product content label and terms & conditions.

Bill Onserts:

Bill Onserts are an internal / no cost marketing tool that allows SCE to provide all Bundled Service Customers with Green Rate specific program information in a designated section of their bill, and encourage customers to visit SCE's website to enroll in the program. Bill Onsert messaging was provided within the March and April billing cycles.

Other Marketing Efforts:

Additional marketing efforts included placing digital banner ads promoting the GTSR program on SCE's employee portal, as well as on Symon screens (digital signage kiosks) within its office and the offices of partnerships/municipalities. Floor-type display banners were placed within SCE's office buildings. A comprehensive two-day clean energy program training session was held for non-residential Account Managers. Training materials included the GTSR program. This training better prepared the business account managers to promote the program by utilizing

their relationships with commercial customers. Energy Partnerships' and Local Partnerships' representatives reached out to city partners and community-based organizations to educate customers on the renewable rate options that support a cleaner, healthier environment and support renewable goals; and call center representatives suggested Green Rate as an offering to callers. An advertisement was published in the US Green Building Council's newsletter highlighting how customers earn Leadership in Energy and Environmental Design ("LEED") points for participating in the Green Rate program.

Quantitative Results:

Since SCE's GTSR launch on February 25, 2016, SCE enrolled a gross total count of 922 customers in the Green Rate program, of which 321 enrolled in 2017.

Customer Type	50% Subscription	100% Subscription	Total Customers Enrolled
Residential	248	648	896
Non-Residential	3	23	26
			922

The two highest months of conversions were in May 2017 and October 2017 with 53 and 52 enrollments, respectively. SCE believes the May volume was influenced by the bill inserts sent in the March and April billing cycles. A portion of the October enrollments may be contributed to multi-channel tactics, such as the late September email deployment which coincided with the digital rate communications marketing campaigns.

F. CCA Code of Conduct

SCE did not conduct any marketing efforts that could be reasonably interpreted to be in violation of the CCA Code of Conduct by unfairly targeting CCA customers for enrollment into SCE's GTSR Program. SCE adhered to the CCA Code of Conduct with respect to all GTSR Program activities. SCE's marketing efforts were not targeted to customers in a CCA territory nor did outreach materials developed include any mention of CCA's or CCA green tariff programs.

G. Supplier Diversity

It is SCE’s goal to continue collaborating with its internal and external partners to advance supplier diversity. Supplier diversity is critical to SCE’s mission to safely provide reliable, clean, and affordable energy to customers. SCE’s supplier diversity spend results in 2017 demonstrate its commitment to maintaining a diverse supplier base. In 2017, SCE spent more than \$1.72 billion, or 43.92% of its total purchases, procuring goods and services from diverse businesses, including women, minority, disabled veteran, lesbian, gay, bisexual, and transgender business enterprises. This represents the fifth consecutive year SCE exceeded its 40% aspirational spend goal with diverse suppliers; however, no GTSR projects counted toward its supplier diversity goals.

H. CARE Enrollment

In 2017, 25 customers enrolled in SCE’s CARE program (21 CARE-Domestic⁷ and 4 CARE-SDP⁸), bringing SCE’s cumulative CARE program enrollment number to 61 customers. The Table below provides the locations of the CARE customers.

TABLE 4: LOCATIONS OF CARE CUSTOMERS WHO ENROLLED IN 2017

Barstow	Menifee	San Gabriel
Beaumont	Ontario	Santa Ana
Fullerton	Palm Springs	Santa Barbara
Hemet	Palmdale	Santa Monica
Inyokern	Rancho Cucamonga	Ventura
La Puente	Rancho Mirage	Victorville
Los Angeles	San Bernardino	Whittier

SB 43 requires that 100 MW of the GTSR Program be reserved for facilities that are no larger than 1 MW and are located in “the most impacted and disadvantaged communities” as

⁷ SCE’s CARE-Domestic Schedule, or Schedule D-CARE, is accessible at <https://www.sce.com/NR/sc3/tm2/pdf/ce93-12.pdf>.

⁸ Customers enrolling in Schedule D-CARE have the option to combine Schedule D-CARE with certain other schedules, such as Schedule D-SDP (Domestic Summer Discount Plan). See Schedule D-CARE (Special Conditions, Item 8). SCE’s Schedule D-SDP is accessible at <https://www.sce.com/NR/sc3/tm2/pdf/ce342.pdf>.

identified by CalEPA.⁹ This mandate is referred to as the EJ Reservation, and to the facilities as the EJ Projects. EJ Projects must be located in the 20 percent most impacted communities based on the results from the methodology in the CalEnviroScreen (“CES”) 3.0, the Office of Environmental Health Hazard Assessment’s environmental health screening tool using census tract information.¹⁰

Seven of the 25 CARE customers enrolled in 2017 have a “Disadvantaged Community” indication as they are located in the 20 percent most impacted communities eligible for EJ Projects and in relation to planned or existing EJ Projects; however, SCE does not have any projects in these communities. For those seven CARE customers, Table 4.1 illustrates each customer’s location’s potential percentile range in the EJ locations.

TABLE 4.1: CUSTOMER LOCATION’S PERCENTILE RANGE IN EJ LOCATIONS

CITY	CES 3.0 PERCENTILE RANGE
LOS ANGELES	86-90%
ONTARIO	86-90%
LA PUENTE	86-90%
SAN BERNARDINO	81-85%
SANTA ANA	81-85%
LA PUENTE	81-85%
SAN BERNARDINO	76-80%

I. Reports of Fraud or Misleading Advertisement

To date, SCE has not received any reports of fraud or misleading advertisements related to the GTSR Program.

J. Enrollment Figures for Low-Income Customers and Subscribers Who Speak a Language Other than English at Home

The CARE and the Family Electric Rate Assistance (“FERA”) programs are collectively referred to as Income Qualified Programs (“IQPs”). These IQPs are funded from surcharges on all service accounts that are not enrolled in them.

⁹ SB 43 §1, codified in Cal. Pub. Util. Code § 2833(d)(1)(A).

¹⁰ The data is accessible at <https://oehha.ca.gov/media/downloads/calenviroscreen/document/ces3results.xlsx>.

Customers enrolled in the programs receive the following discounts on electrical rates:

- CARE provides a 30 percent discount on domestic regular rates for qualifying customers, and
- FERA allows qualifying households with three or more persons to receive a 12 percent discount on domestic regular rates for qualifying customers.

There are a number of eligibility requirements that must be met including household income. The Commission sets guidelines for the maximum annual household income that qualifies for CARE, FERA, and other energy assistance programs. These guidelines, which are adjusted each year, are based on U.S. Department of Health and Human Services standards for family income (sometimes called the “Federal Poverty Level”).

SCE did not carry out an active low income targeting marketing effort in 2017. However, SCE used general outreach tactics such as the Rate Communications Marketing Campaign that reached low income customers. 25 Low Income customers were enrolled in 2017, representing 8 percent of all new enrollments for 2017. All 25 customers were enrolled in CARE (described in Section H). There were no new enrollments in FERA.

Of those 25 low income customers, based on the CARE/FERA language profile, two preferred Spanish, one preferred Chinese/Mandarin, and one preferred Korean over English.

IV.

CONCLUSION

SCE respectfully files the foregoing Annual Report pursuant to OP 10 of D.15-01-051.

Respectfully submitted,

JANET S. COMBS
VIVIAN A. LE

/s/ Vivian A. Le

By: Vivian A. Le

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6093
Facsimile: (626) 302-3990
E-mail: Vivian.Le@sce.com

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