

January 22, 2021

Executive Division
Attention: Rachel Peterson
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Comments of Southern California Edison Company on Draft Resolution M-4849 Authorization and Order Directing Utilities to Extend Emergency Customer Protections to Support California Customers Through June 30, 2021, and to File Transition Plans for the Expiration of the Emergency Customer Protections

Dear Executive Division,

Pursuant to Rule 14.5 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), Southern California Edison Company (SCE) hereby submits its Comments on Draft Resolution M-4849 (Draft Resolution). The Draft Resolution proposes to extend Emergency Customer Protections through June 30, 2021 and to order the utilities to develop transition plans to address the eventual expiration of the Emergency Customer Protections.

SCE does not oppose the Draft Resolution's proposal to extend Emergency Consumer Protections for residential and small business customers through June 30, 2021 and agrees that extending the memorandum accounts established pursuant to Resolution M-4842 to track incremental costs associated with complying with this Draft Resolution is appropriate and necessary to support the extension contemplated by the Commission.

I. BACKGROUND

On March 4, 2020, Governor Newsom declared a statewide emergency due to the COVID-19 pandemic.¹ In response, SCE voluntarily suspended disconnections for

¹ <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>

nonpayment and implemented flexible payment plans for all residential and non-residential customers. On March 17, 2020, the Commission's Executive Director sent a letter to SCE and other Commission-regulated utilities stating the Commission's expectation that they "extend the same applicable consumer protections directed in D.19-07-015 and D.19-08-025 to customers," retroactive to March 4, 2020.

On March 19, 2020, in response to a directive in the March 17 letter, SCE submitted Advice Letter (AL) 230-G/4174-E to implement emergency consumer protection measures, writing it had implemented a moratorium on disconnections for nonpayment for all customers regardless of type or size. On April 16, 2020, the Commission adopted Resolution M-4842, Emergency Authorization and Order Directing Utilities to Implement Emergency Customer Protections to Support California Customers During the Covid-19 Pandemic, which ratified the directives in the Executive Director's March 17 letter. Resolution M-4842 also directed utilities to submit Tier 2 ALs to implement the requirements of Resolution M-4842 and to recover the associated expenses through a to-be-established COVID-19 Pandemic Protections Memorandum Account (CPPMA).

On May 1, 2020, SCE submitted AL 233-G/4205-E to comply with the Commission's directives in Ordering Paragraph (OP) 2 and 4 of Resolution M-4842 by: (1) supplementing the protections provided in its previous AL, as required by the Commission, and (2) requesting authorization to track in the CPPMA the incremental costs associated with compliance of Resolution M-4842. On May 27, 2020, SCE submitted a supplemental AL 233-G-A/4205-E-A, which removed proposed emergency protections for medium and large business customers, waived all deposits for residential and small business customers, described potential capital-related revenue requirements to be tracked in the CPPMA, and clarify the tracking of incremental uncollectible expense and reductions in other operating revenue (OOR) by customer class in the CPPMA for future cost recovery purposes.

On January 15, 2021, the Draft Resolution was issued proposing an extension of the current customer protections adopted in Resolution M-4842 through June 30, 2021 and requiring the utilities to submit transition plans detailing how they will prepare customers for the expiration of the customer protections.

II. DISCUSSION

A. SCE Does Not Oppose the Extension of Emergency Consumer Protections

SCE recognizes the continued impact that the COVID-19 pandemic is having on customers. With more than 99 percent of the population of California currently in the most restrictive reopening tier,² SCE agrees with the Commission's assertion that "California's economy is still months away from recovery."³ With an estimate that

² <https://covid19.ca.gov/stay-home-except-for-essential-needs/>

³ Draft Resolution, p. 3.

supplies of the approved COVID-19 vaccines to be available to “most Californians in all 58 counties by summer 2021,”⁴ an extension of the current Emergency Consumer Protections and the associated cost recovery mechanism for residential and small business customers through June 30, 2021 is not unreasonable. Depending on circumstances going forward, SCE recognizes that there may be consideration for further extension of the customer protections put in place by the Commission and/or the utilities may require time to “undue” the measures. Should additional extensions of these customer protections be contemplated, it will be necessary to consider any such extension in light of impacts to utility cash flow and the measures that may be necessary to address such impacts. SCE appreciates the opportunity to revisit and address the potential cash flow impacts, and any other unintended consequences, should that be warranted if any additional extensions are considered.

III. CONCLUSION

SCE appreciates the opportunity to submit these comments.

Southern California Edison Company

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

GAS:el:cm

cc: April Mulqueen, CPUC
Service Lists for A.20-03-014, A.19-11-003, A.19-09-014, R.18-07-006,
R.18-07-005, R.18-03-011, R.17-06-024, R.15-03-010, and R.12-06-013

⁴ <https://covid19.ca.gov/vaccines/>