

February 21, 2020

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Dear Ms. Bose:

Pursuant to Section 205 of the Federal Power Act and Section 35.13 of the Federal Energy Regulatory Commission's ("Commission" or "FERC") Regulations under the Federal Power Act (18 C.F.R. § 35.13), Southern California Edison Company ("SCE") submits proposed changes to SCE's non-transmission depreciation rates to reflect the California Public Utilities Commission's ("CPUC") 2018 General Rate Case Phase 1 Order ("CPUC Decision").<sup>1</sup> In this filing, SCE is proposing revisions to SCE's formula transmission rate ("Formula Rate") set forth in Schedule 18 of Attachment 2 to Appendix IX of SCE's Transmission Owner Tariff, FERC Electric Tariff, Volume No. 6 ("TO Tariff") in order to conform the Formula Rate non-transmission depreciation rates with the CPUC Decision. These proposed changes to SCE's non-transmission depreciation rates in SCE's Formula Rate are being submitted as a "single-issue" filing pursuant to the protocols of the Formula Rate.<sup>2</sup>

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<sup>1</sup> SCE generally follows a three-year rate GRC cycle at the CPUC. On May 16, 2019 the CPUC issued the CPUC Decision, (Decision. 19-05-020) representing the final GRC decision in Phase 1 of the 2018 test year GRC and setting SCE's total CPUC-jurisdictional revenue requirements.

<sup>2</sup> Section 8e of Appendix IX, Attachment 1 of SCE's TO Tariff.

SCE is required pursuant to the protocols of the Formula Rate to make a single-issue Section 205 filing to revise the General, Intangible, and Distribution depreciation rates stated in the Formula Rate whenever the CPUC issues a final order that changes “depreciation rates for General, Intangible or Distribution plant”:

“SCE will make a single-issue Section 205 filing to change the depreciation rates for General, Intangible or Distribution plant in Schedule 18 upon approval by the CPUC of revised depreciation rates for these plant categories. SCE shall make a filing at the Commission, as set forth in this section, between January 1 and March 1 of the year following the year that the CPUC order became effective.” (Section 8e of Appendix IX, Attachment 1 of SCE’s TO Tariff)

The CPUC Decision makes revisions affecting SCE’s depreciation rates for four General, Intangible or Distribution plant accounts with an effective date of January 1, 2018.<sup>3</sup> Mr. Alan Varvis explains the aspects of the CPUC Decision that affect SCE’s non-transmission depreciation rates in his attached Affidavit (Exhibit A). SCE is submitting this filing to revise its non-transmission depreciation rates to conform to the CPUC Decision and its approved Formula Rate Protocols.

The documents submitted with this filing consist of this letter of transmittal and all attachments hereto; the revised TO Tariff (Appendix IX, Attachment 2) in both clean and redline format, which include tariff sheets effective November 12, 2019; the Declaration of Alan Varvis (Exhibit A); a copy of the relevant portions of the CPUC Decision (Exhibit B); and SCE’s original 2018 GRC Phase 1 application regarding non-transmission depreciation (Exhibit C).

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<sup>3</sup> Since SCE has no Distribution Plant under the California ISO’s Operational Control, the change in the distribution depreciation rates does not affect the formula transmission rate calculation of transmission revenue requirements.

## **I. BACKGROUND**

SCE's currently-effective Formula Rate was submitted to the Commission on April 11, 2019 in Docket No. ER19-1553.<sup>4</sup> On June 11, 2019, the Commission accepted for filing and suspended the Formula Rate, to be effective on November 12, 2019, subject to refund, and hearing and settlement procedures. The Formula Rate is currently in settlement procedures in Docket ER19-1553-000.

SCE's Formula Rate is set forth in Appendix IX of SCE's TO Tariff, and includes an Attachment 1 consisting of the Formula Protocols, and an Attachment 2, the Formula Spreadsheet, consisting of 34 individual schedules that calculate different aspects of SCE's Base TRR and associated rates. Schedule 18 of the Formula Spreadsheet lists SCE's depreciation rates, both non-transmission and transmission. Schedule 17 of the Formula Spreadsheet determines SCE's depreciation expense based on the depreciation rates stated in Schedule 18.

On May 19, 2019, the CPUC issued the CPUC Decision, which adopts SCE's non-transmission depreciation rates. The CPUC Decision revises four non-transmission depreciation rates effective on January 1, 2018. As a result, SCE's non-transmission depreciation rates stated in Schedule 18 of the Formula Rate are currently inconsistent with the CPUC authorized depreciation rates. Pursuant to the Formula Rate Protocols, SCE is making this single-issue Section 205 filing to request the Commission approval to make necessary revisions to the Formula Rate tariff to conform to the non-transmission depreciation rates adopted in the CPUC Decision.<sup>5</sup> The changes to non-transmission depreciation rates stated in Schedule 18 of the Formula Rate are explained in Exhibit A. In this filing, SCE is

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<sup>4</sup> SCE's first formula rate was in effect from January 1, 2012 through December 31, 2017 (Docket No. ER11-3697). SCE's second formula rate was in effect from January 1, 2018 through November 11, 2019 (Docket No. ER18-169).

<sup>5</sup> SCE submitted similar filings to revise the formula transmission rate non-transmission depreciation rates in Docket No. ER13-1253 on April 8, 2013, accepted by the Commission in a letter order issued May 22, 2013, and Docket No. ER16-686 on January 6, 2016, accepted by the Commission in a letter order issued February 22, 2016.

proposing to revise only those aspects of the Formula Rate that are necessary to correctly reflect the CPUC Decision.

## **II. PROPOSED REVISIONS TO SCE'S DEPRECIATION RATES**

As discussed above, in this single-issue filing SCE is only seeking to revise its non-transmission depreciation rates set forth in the Formula Rate to maintain consistency with the CPUC Decision. SCE is not proposing to revise the currently-effective Base TRR or any aspect of the Formula Rate tariff other than the non-transmission depreciation rates (Schedule 18 of Attachment 2 to Appendix IX).

Attachment 1 to Exhibit A of this filing, page 1 of 2, also compares the proposed depreciation rates with the currently-effective depreciation rates. The revised depreciation rates will not affect SCE's Base TRRs until SCE submits its next Annual Update filing by December 1 of this year. The December 1, 2020 Annual Update filing will utilize the revised Formula Rate tariff, including the proposed revised non-transmission depreciation rates, subject to any further formula rate tariff revisions with an effective date prior to December 1, 2020. The Base TRRs effective January 1, 2021 will reflect these revised non-transmission depreciation rates.

For illustrative purposes, on page 2 of 2 of Attachment 1 of Exhibit A, Mr. Varvis also provides a rough estimate of the future impact of these depreciation rate changes on SCE's Base TRR by applying the proposed revised depreciation rates to SCE's last Annual Update filing in FERC Docket No. ER19-1553, dated November 22, 2019, as a proxy.<sup>6</sup> The

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<sup>6</sup> General and Intangible Depreciation Expenses are allocated to the formula revenue requirement based on the wages and salaries (labor) allocation factor, which was 6.0143% in the TO2019A Annual Update.

resulting illustrative change in revenue is a decrease to the Base TRR of about \$1.11 million or 0.11%.

### **III. EFFECTIVE DATE**

Pursuant to Section 8 of Attachment 1 of Appendix IX of SCE's TO Tariff, SCE requests that the Commission authorize the proposed changes to SCE's non-transmission depreciation rates set forth in SCE's Formula Rate Schedule 18 included in Attachment 2 to Appendix IX of SCE's TO Tariff, to become effective on November 12, 2019, the effective date of SCE's currently-effective Formula Rate.<sup>7</sup> This effective date is prescribed in SCE's Formula Rate Protocols so as to ensure consistency in the application of the CPUC-adopted depreciation rates for FERC-jurisdictional and CPUC-jurisdictional rates.

SCE respectfully requests, pursuant to Section 35.11 (18 C.F.R. §35.11) of the Commission's Regulations, waiver of the 60-day prior notice requirement specified in Section 35.3. Good cause exists for such waiver to be granted for the reasons stated above. Waiver would also be consistent with the Commission's policy set forth in *Central Hudson Gas & Electric Corp., et al.*, 60 FERC 61,106 reh'g denied, 61 FERC 61,089 (1992), in that the proposed tariff and depreciation rate revisions, pursuant to Section 8 of the Formula Rate Protocols, are to become effective on the date that the revised depreciation rates go into effect for CPUC ratemaking purposes.

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<sup>7</sup> The General, Intangible, and Distribution depreciation rates that SCE is proposing to revise in this filing were previously consistently revised in SCE's settlement of the previous Formula Rate (TO2018, the "Second Formula Rate", Docket No. ER18-169). *See* Settlement Term 3.14 of SCE's settlement filed on September 16, 2019 and approved by the Commission in an Order issued On December 3, 2019. These revisions applied to the entire term of the Second Formula Rate, January 1, 2018 through November 11, 2019. Thus, if the Commission approves the revisions proposed in this filing, on the November 12, 2019 effective date proposed by SCE, the proposed depreciation rates will have been in effect beginning on January 1, 2018, consistent with the CPUC GRC decision effective date.

#### **IV. SERVICE**

Copies of this filing have been served on all parties to Docket No. ER18-169, Docket No. EL18-44, and Docket No. ER19-1553, including the CPUC, as well as the California Independent System Operator (“CAISO”).

#### **V. COMMUNICATIONS**

SCE requests that all correspondence, pleadings and other communications concerning this filing be served upon:

Matthew Dwyer  
Senior Attorney  
Southern California Edison Company  
P.O. Box 800  
Rosemead, CA 91770  
Tel. (626) 302-6521

Jeffrey L. Nelson  
Director, FERC Rates & Markets Integration  
Southern California Edison Company  
P.O. Box 800  
Rosemead, CA 91770  
Tel. (626) 302-4834

#### **VI. OTHER FILING REQUIREMENTS**

The illustrative annualized change in revenues resulting from the revised depreciation rates for General, Intangible and Distribution plant proposed in this filing are set forth in Attachment 1 to Exhibit A. This estimated change in revenues will not occur until SCE submits its TO2021 Annual Update Filing by December 1, 2020, for rates effective January 1, 2021. SCE’s currently-effective Retail Base TRR of \$963 million, established in SCE’s TO2020 Annual Update filing dated November 22, 2019, effective January 1, 2020, is not being revised in this filing.

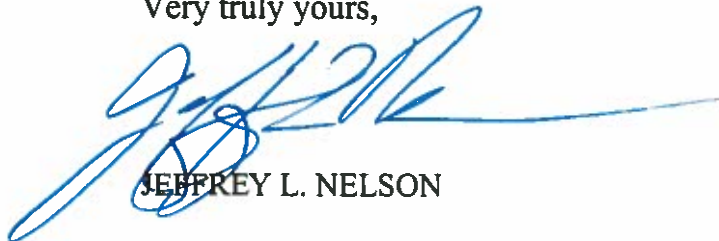
No expenses or costs included in the rates tendered herein have been alleged or judged in any administrative or judicial proceeding to be illegal,

duplicative or unnecessary costs that are demonstrably the product of discriminatory employment practices.

SCE believes that the information contained in this filing provides a sufficient basis upon which to accept this filing; however, to the extent necessary, SCE further requests that the Commission waive its filing requirements contained in Section 35 of its regulations to the extent necessary in order to permit this filing to be made effective as requested.

SCE believes that this filing conforms to any rule of general applicability and to any Commission order specifically applicable to SCE, and has made copies of this filing available for public inspection in SCE's principal office located in Rosemead, California. SCE has provided copies of this filing to those persons whose names appear on the enclosed mailing list.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'J. Nelson', with a long horizontal flourish extending to the right.

JEFFREY L. NELSON

FEDERAL ENERGY REGULATORY COMMISSION

Mailing List

NAME	ADDRESS
California Public Utilities Commission Arocles Aguilar, General Counsel State of California	State Building 505 Van Ness Avenue San Francisco, California 94102 arocles.aguilar@cpuc.ca.gov
California Independent System Operator Corp. Attention: Regulatory Contracts	250 Outcropping Way Folsom, California 95630 regulatorycontracts@caiso.com

\*In addition to the contacts listed above, the additional fourteen (14) pages contain the contact information for Docket No. ER18-169, EL 18-44, and ER19-1553 service list.




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**Service List for ER18-169-000 Southern California Edison Company**

Contacts marked \*\* must be postal served

<b>Party</b>	<b>Primary Person or Counsel of Record to be Served</b>	<b>Other Contact to be Served</b>
California Department of Water Resources State Water Project	Thomas Trauger Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES tom.trauger@spiegelmc.com	Katharine M. Mapes Attorney Spiegel & McDiarmid LLP 1825 Eye Street N.W. 7th Floor Washington, DISTRICT OF COLUMBIA 20006 katharine.mapes@spiegelmc.com
California Department of Water Resources State Water Project		Latif Nurani Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 latif.nurani@spiegelmc.com
California Department of Water Resources State Water Project		Amber L Martin, ESQ Associate Spiegel & McDiarmid LLP Spiegel & McDiarmid LLP 1875 Eye Street, NW, Suite 700 Washington, DISTRICT OF COLUMBIA 20006 amber.martin@spiegelmc.com
California Department of Water Resources State Water Project		E Service Spiegel & McDiarmid LLP 1875 Eye St, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 eService@spiegelmc.com
California Department of Water Resources State Water Project		Michael A Ramsey Mike.Ramsey@water.ca.gov
California Department of Water Resources State Water Project		Matthew J Goldman Deputy Attorney General California Department of Justice 1300 I Street Sacramento, CALIFORNIA 95814 matthew.goldman@doj.ca.gov
California Department of Water Resources State Water Project		Peggy Bernardy Staff Counsel California Department of Water Resources pbernard@water.ca.gov
California Department of Water Resources State Water Project		Masoud Shafa California Department of Water Resources PO Box 942836 Sacramento, 94236 Masoud.Shafa@water.ca.gov

California Public Utilities Commission	Gregory Heiden California Public Utilities Commission 505 Van Ness Ave. San Francisco, CALIFORNIA 94102 UNITED STATES gregory.heiden@cpuc.ca.gov	Pouneh Ghaffarian Staff Attorney California Public Utilities Commission 505 Van Ness Ave. San Francisco, CALIFORNIA 94102 pouneh.ghaffarian@cpuc.ca.gov
California Public Utilities Commission	Lou Torres 505 Van Ness Avenue San Francisco, CALIFORNIA 94102 UNITED STATES Louis.Torres@cpuc.ca.gov	
California Public Utilities Commission	Stephanie Hoehn Attorney California Public Utilities Commission 505 Van Ness Avenue San Francisco, CALIFORNIA 94102 UNITED STATES stephanie.hoehn@cpuc.ca.gov	
Federal Energy Regulatory Commission	Michael Loatman Commission Staff Counsel 888 First St. NE Washington, DISTRICT OF COLUMBIA 20426 UNITED STATES Michael.Loatman@ferc.gov	Ryan Walsh Commission Staff Counsel Ryan.Walsh@ferc.gov
Golden State Water Company	Phyllis Kimmel McCarter & English, LLP 1717 K Street, NW Suite 900 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES pkimmel@pgklawoffice.com	
Imperial Irrigation District	Michael Postar Attorney Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, N.W., Suite 700 Duncan Weinberg Genzer & Pembroke Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES mrp@dwgp.com	Linda L. Murray-Kimball Legal Assistant Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 lmk@dwgp.com
Imperial Irrigation District	Sean Neal Attorney Duncan, Weinberg, Genzer & Pembroke PC 915 L Street Suite 1410 Sacramento, CALIFORNIA 95814 UNITED STATES smn@dwgp.com	Robert A. Laurie Assistant General Counsel, Ener Imperial Irrigation District P.O. Box 937 Imperial, CALIFORNIA 92251-0937 ralaurie@iid.com
Imperial Irrigation District		Jamie Asbury Imperial Irrigation District Imperial Irrigation District 1561 Main Street El Centro, CALIFORNIA 92243 jlasbury@IID.com
Los Angeles Department of Water & Power	Philip Mone Of Counsel Van Ness Feldman LLP 1050 Thomas Jefferson Street, NW Washington, DISTRICT OF COLUMBIA 20007 UNITED STATES pwm@vnf.com	syndi driscoll Deputy City Attorney Los Angeles Department of Water & Power 221 North Figueroa St LOS ANGELES, CALIFORNIA 91002 syndi.driscoll@ladwp.com

Los Angeles Department of Water & Power		David B Cohen dcohen@navigant.com
Modesto Irrigation District	Sean Neal Attorney Duncan, Weinberg, Genzer & Pembroke PC 915 L Street Suite 1410 Sacramento, CALIFORNIA 95814 UNITED STATES smn@dwgp.com	Linda L. Murray-Kimball Legal Assistant Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 lmk@dwgp.com
Modesto Irrigation District		Gregory E Salyer Resource Planning & Developmen Modesto Irrigation District PO Box 4060 Modesto, CALIFORNIA 95352 GregS@mid.org
Modesto Irrigation District		James McFall jamesm@mid.org
Northern California Power Agency	Lisa Dowden Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES Lisa.Dowden@spiegelmc.com	Katharine M. Mapes Attorney Spiegel & McDiarmid LLP 1825 Eye Street N.W. 7th Floor Washington, DISTRICT OF COLUMBIA 20006 katharine.mapes@spiegelmc.com
Northern California Power Agency		Latif Nurani Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 latif.nurani@spiegelmc.com
Northern California Power Agency		Amber L Martin, ESQ Associate Spiegel & McDiarmid LLP Spiegel & McDiarmid LLP 1875 Eye Street, NW, Suite 700 Washington, DISTRICT OF COLUMBIA 20006 amber.martin@spiegelmc.com
Northern California Power Agency		E Service Spiegel & McDiarmid LLP 1875 Eye St, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 eService@spiegelmc.com
Northern California Power Agency		Randy Howard Northern California Power Agency 651 Commerce Drive Roseville, CALIFORNIA 95678 Randy.Howard@ncpa.com
Pacific Gas and Electric Company	Charles Middlekauff Attorney Pacific Gas and Electric Company PO Box 7442 San Francisco,CALIFORNIA 94120- 7442 UNITED STATES crmd@pge.com	Moshreq Sobhy Principal, Case Manager Transm Pacific Gas and Electric Company 77 Beale St. San Francisco, CALIFORNIA 94105 mzsr@pge.com

San Diego Gas & Electric Company	Ross Fulton Senior Counsel San Diego Gas & Electric 8330 Century Park Court San Diego, CALIFORNIA 92123 UNITED STATES rfulton@sdge.com	Jeff Stein jstein@semprautilities.com
Six Cities CA	Margaret McNaul Attorney Thompson Coburn LLP 1909 K Street, N.W. Suite 600 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES mmcnaul@thompsoncoburn.com	Bonnie Susan Blair Attorney Thompson Coburn LLP 1909 K Street, N.W. Suite 600 Washington, DISTRICT OF COLUMBIA 20006 bblair@thompsoncoburn.com
Six Cities CA		Rebecca Shelton Thompson Coburn LLP 1909 K Street, N.W., Suite 600 Washington, DISTRICT OF COLUMBIA 20006-1167 rshelton@thompsoncoburn.com
Six Cities CA	Thomas (Tom) Miller City of Banning, California tmiller@ci.banning.ca.us	Carrie A Thompson Principal Integrated Resources City of Anaheim, California 201 S. Anaheim Blvd. Suite 802 Anaheim, CALIFORNIA 92805 cathompson@anaheim.net
Six Cities CA		Nicholas T Burki Integrated Resources Planner I ANAHEIM PUBLIC UTILITIES 201 S. Anaheim Blvd. Suite 802 Anaheim, CALIFORNIA 92805 Nburki@anaheim.net
Six Cities CA		David X. Kolk DKolk@ci.colton.ca.us
Six Cities CA		Eric R Klinkner Deputy General Manager City of Pasadena Dept. of Water & Power 150 S. Los Robles Suite 200 Pasadena, CALIFORNIA 91101 eklinkner@cityofpasadena.net
Six Cities CA		MARTIN B OCHOTORENA Contracts/Projects Manager 3435 14th Street Riverside, CALIFORNIA 92501 mochotorena@riversideca.gov
Southern California Edison Company	Rebecca Furman Attorney Southern California Edison Company PO Box 800 Rosemead, CALIFORNIA UNITED STATES rebecca.furman@sce.com	Jeffrey Nelson Manager of Market Design and A Southern California Edison Company 2244 Walnut Grove Ave. Rosemead, CALIFORNIA 91770 jeff.nelson@sce.com
Southern California Edison Company	Matthew Dwyer Southern California Edison Company 2244 Walnut Grove Ave. Rosemead, CALIFORNIA 91770 UNITED STATES matthew.dwyer@sce.com	FERC Case Administration Southern California Edison Company 2244 Walnut Grove Ave. Rosemead, CALIFORNIA 91770 ferccaseadmin@sce.com
State Water Contractors	Bhaveeta Mody Duncan, Weinberg, Genzer &	Linda L. Murray-Kimball Legal Assistant

	Pembroke PC 1667 K Street, N.W. Suite 700 Washington, D.C., DISTRICT OF COLUMBIA 20006 UNITED STATES bkm@dwgp.com	Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 lmk@dwgp.com
State Water Contractors		Eric Chapman Deputy General Manager State Water Contractors 1121 L Street Suite 1050 Sacramento, CALIFORNIA 95814 echapman@swc.org
The City of Santa Clara, California and the M-S-R Public Power Agency	Peter Scanlon Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES pjs@dwgp.com	Linda L. Murray-Kimball Legal Assistant Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 lmk@dwgp.com
The City of Santa Clara, California and the M-S-R Public Power Agency	Lisa Gast Attorney Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES lsg@dwgp.com	
The City of Santa Clara, California and the M-S-R Public Power Agency	Joshua Adrian INDIVIDUAL 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES jea@dwgp.com	
Transmission Agency of Northern California	Michael Postar Attorney Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, N.W., Suite 700 Duncan Weinberg Genzer & Pembroke Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES mrp@dwgp.com	Linda L. Murray-Kimball Legal Assistant Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 lmk@dwgp.com
Transmission Agency of Northern California	Bhaveeta Mody Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, N.W. Suite 700 Washington, D.C., DISTRICT OF COLUMBIA 20006 UNITED STATES bkm@dwgp.com	

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Contacts marked \*\* must be postal served

<b>Party</b>	<b>Primary Person or Counsel of Record to be Served</b>	<b>Other Contact to be Served</b>
California Department of Water Resources State Water Project		Masoud Shafa California Department of Water Resources PO Box 942836 Sacramento, 94236 Masoud.Shafa@water.ca.gov
California Public Utilities Commission	Stephanie Hoehn Attorney California Public Utilities Commission 505 Van Ness Avenue San Francisco, CALIFORNIA 94102 UNITED STATES stephanie.hoehn@cpuc.ca.gov	
City of Los Angeles Department of Water and Power	Philip Mone Of Counsel Van Ness Feldman LLP 1050 Thomas Jefferson Street, NW Washington, DISTRICT OF COLUMBIA 20007 UNITED STATES pwm@vnf.com	
City of Los Angeles Department of Water and Power		denis obiang Deputy City Attorney--LADWP Los Angeles Department of Water & Power 111 NORTH HOPE ST, ROOM 1246 LOS ANGELES, CALIFORNIA 91002 denis.obiang@ladwp.com
City of Los Angeles Department of Water and Power		David B Cohen dcohen@navigant.com
Federal Energy Regulatory Commission	Michael Loatman 888 First St. NE Washington, DISTRICT OF COLUMBIA 20426 UNITED STATES Michael.Loatman@ferc.gov	Ryan Walsh Commission Staff Counsel Ryan.Walsh@ferc.gov
Golden State Water Company	Phyllis Kimmel McCarter & English, LLP 1717 K Street, NW Suite 900 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES pkimmel@pgklawoffice.com	
Pacific Gas and Electric Company	Charles Middlekauff Attorney Pacific Gas and Electric Company PO Box 7442 San Francisco,CALIFORNIA 94120-7442 UNITED STATES crmd@pge.com	

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### Service List for ER19-1553-000 Southern California Edison Company

Contacts marked \*\* must be postal served

Party	Primary Person or Counsel of Record to be Served	Other Contact to be Served
Aguirre & Severson, LLP	Michael Aguirre Aguirre & Severson, LLP 501 West Broadway Suite 1050 San Diego, CALIFORNIA 92101 UNITED STATES maguirre@amslawyers.com	Maria Byrnes Legal Assistant, Aguirre & Severson, LLP 501 West Broadway Suite 1050 San Diego, CALIFORNIA 92101 mbyrnes@amslawyers.com
Aguirre & Severson, LLP		Maria Severson Aguirre & Severson, LLP 501 West Broadway Suite 1050 San Diego, CALIFORNIA 92101 mseverson@amslawyers.com
California Department of Water Resources State Water Project	Katharine Mapes Attorney Spiegel & McDiarmid LLP 1825 Eye Street N.W. 7th Floor Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES katharine.mapes@spiegelmc.com	Thomas Trauger Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 tom.trauger@spiegelmc.com
California Department of Water Resources State Water Project		Latif Nurani Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 latif.nurani@spiegelmc.com
California Department of Water Resources State Water Project		Benjamin N. Reiter Attorney Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 benjamin.reiter@spiegelmc.com
California Department of Water Resources State Water Project		E Service Spiegel & McDiarmid LLP 1875 Eye St, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 eService@spiegelmc.com
California Department of Water Resources State Water Project		Matthew J Goldman Deputy Attorney General California Department of Justice 1300 I Street Sacramento, CALIFORNIA 95814 matthew.goldman@doj.ca.gov
California Department of Water Resources State Water Project		Masoud Shafa California Department of Water Resources PO Box 942836 Sacramento, 94236 Masoud.Shafa@water.ca.gov
Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California	Margaret McNaul Attorney Thompson Coburn LLP 1909 K Street, N.W. Suite 600	Bonnie Susan Blair Attorney Thompson Coburn LLP 1909 K Street, N.W. Suite 600



	Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES mmcnaul@thompsoncoburn.com	Washington, DISTRICT OF COLUMBIA 20006 bblair@thompsoncoburn.com
Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California		Rebecca Shelton Thompson Coburn LLP 1909 K Street, N.W., Suite 600 Washington, DISTRICT OF COLUMBIA 20006-1167 rshelton@thompsoncoburn.com
Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California		Kayla Grant Thompson Coburn LLP 1909 K Street NW Suite 600 Washington, DISTRICT OF COLUMBIA 20006 kgrant@thompsoncoburn.com
Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California		Carrie A Thompson Principal Integrated Resources City of Anaheim, California 201 S. Anaheim Blvd. Suite 802 Anaheim, CALIFORNIA 92805 cathompson@anaheim.net
Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California		Nicholas T Burki Integrated Resources Planner I ANAHEIM PUBLIC UTILITIES 201 S. Anaheim Blvd. Suite 802 Anaheim, CALIFORNIA 92805 Nburki@anaheim.net
Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California		Thomas (Tom) A. Miller tmiller@ci.banning.ca.us
Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California		David X. Kolk DKolk@ci.colton.ca.us
Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California		Eric R Klinkner Deputy General Manager City of Pasadena Dept. of Water & Power 150 S. Los Robles Suite 200 Pasadena, CALIFORNIA 91101 eklinkner@cityofpasadena.net
Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California		MARTIN B OCHOTORENA Contracts/Projects Manager 3435 14th Street Riverside, CALIFORNIA 92501 mochotorena@riversideca.gov
City and County of San Francisco	Katharine Mapes Attorney Spiegel & McDiarmid LLP 1825 Eye Street N.W. 7th Floor Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES katharine.mapes@spiegelmc.com	Latif Nurani Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 latif.nurani@spiegelmc.com
City and County of San Francisco		Benjamin N. Reiter Attorney Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 benjamin.reiter@spiegelmc.com
City and County of San Francisco		E Service Spiegel & McDiarmid LLP 1875 Eye St, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 eService@spiegelmc.com

City and County of San Francisco		Theresa L Mueller Deputy City Attorney City Attorney's Office City Hall, Room 234 1 Dr. Carlton B. Goodlett Place San Francisco, CALIFORNIA 94102 theresa.mueller@sfcityatty.org
City and County of San Francisco		Dan Willis Sr. Regulatory and Legislative San Francisco Public Utilities Comm. 525 Golden Gate Ave San Francisco, CALIFORNIA 94102 dwillis@sfwater.org
City of Santa Clara, California and M-S-R Public Power Agency	Martin Hopper General Manager msr.general.manager@gmail.com	Nena D Robinson Legal Assistant Duncan, Weinberg, Genzer & Pembroke PC DUNCAN WEINBERG GENZER & PEMBROKE PC 1667 K STREET, NW SUITE 700 WASHINGTON, DISTRICT OF COLUMBIA 20006 ndr@dwgp.com
City of Santa Clara, California and M-S-R Public Power Agency	Peter Scanlon Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES pjs@dwgp.com	
City of Santa Clara, California and M-S-R Public Power Agency	Lisa Gast Attorney Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES lsg@dwgp.com	
City of Santa Clara, California and M-S-R Public Power Agency	Joshua Adrian Duncan, Weinberg, Genzer & Pembroke, P.C. 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES jea@dwgp.com	
City of Santa Clara, California and M-S-R Public Power Agency	Manuel Pineda MPineda@SantaClaraCA.gov	
CPUC	Gregory Heiden California Public Utilities Commission 505 Van Ness Ave. San Francisco, CALIFORNIA 94102 UNITED STATES gregory.heidencpuc.ca.gov	Christine Jun Hammond Attorney California Public Utilities Commission California Public Utilities Commission 505 Van Ness Ave. - Legal Division San Francisco, CALIFORNIA 94102-3298 christine.hammond@cpuc.ca.gov
CPUC	Pouneh Ghaffarian Staff Attorney California Public Utilities Commission 505 Van Ness Ave. San Francisco, CALIFORNIA 94102	Simon Hurd California Public Utilities Commission 505 Van Ness Avenue San Francisco, CALIFORNIA 94102 Simon.Hurd@cpuc.ca.gov

	UNITED STATES pouneh.ghaffarian@cpuc.ca.gov	
CPUC	Lou Torres California Public Utilities Commission 505 Van Ness Avenue San Francisco, CALIFORNIA 94102 UNITED STATES Louis.Torres@cpuc.ca.gov	Elaine Sison-Lebrilla California Public Utilities Commission elaine.sison-lebrilla@cpuc.ca.gov
CPUC	Kelsey Choing California Public Utilities Commission kelsey.choing@cpuc.ca.gov	Geneva G Looker Whitfield Russell Associates glooker@wrassoc.com
CPUC	**HOWARD LUBOW EX. V. PRES. Overland Consulting SUITE 400 8325 Lenexa Dr Lenexa, KANSAS 662141654 UNITED STATES	
CPUC		Matthew Kahal mkahal@comcast.net
Energy Producers & Users Coalition		Maurice Brubaker Managing Principal Brubaker & Associates, Inc. PO Box 412000 Chesterfield, 63141-2000 Saint Louis mbrubaker@consultbai.com
Federal Energy Regulatory Commission	Michael Loatman Commission Staff Counsel 888 First St. NE Washington, DISTRICT OF COLUMBIA 20426 UNITED STATES Michael.Loatman@ferc.gov	Ryan Walsh Commission Staff Counsel Ryan.Walsh@ferc.gov
Federal Energy Regulatory Commission		Thomas Bridges Commission Staff Counsel 888 1st St., NE Washington, DISTRICT OF COLUMBIA 20426 Thomas.Bridges@ferc.gov
Golden State Water Company	Phyllis Kimmel McCarter & English, LLP 1717 K Street, NW Suite 900 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES pkimmel@pgklawoffice.com	
GridLiance West LLC	Jay Carriere Vice President, Federal Govern Gridliance 964 Featherstone Street Gaithersburg, MARYLAND 20878 UNITED STATES jcarriere@gridliance.com	
Imperial Irrigation District	Robert Laurie Assistant General Counsel, Ener Imperial Irrigation District P.O. Box 937 Imperial, CALIFORNIA 92251- 0937 UNITED STATES ralaurie@iid.com	Nena D Robinson Legal Assistant Duncan, Weinberg, Genzer & Pembroke PC DUNCAN WEINBERG GENZER & PEMBROKE PC 1667 K STREET, NW SUITE 700 WASHINGTON, DISTRICT OF COLUMBIA 20006 ndr@dwgp.com
Imperial Irrigation District	Jamie Asbury Imperial Irrigation District Imperial Irrigation District 1561 Main Street El Centro, CALIFORNIA 92243 UNITED STATES jlasbury@IID.com	

Imperial Irrigation District	Michael Postar Attorney Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, N.W., Suite 700 Duncan Weinberg Genzer & Pembroke Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES mrp@dwgp.com	Clarence R Hawkes, III Duncan, Weinberg, Genzer & Pembroke, P.C. 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 crh@dwgp.com
Imperial Irrigation District	Sean Neal Attorney Duncan, Weinberg, Genzer & Pembroke PC 915 L Street Suite 1410 Sacramento, CALIFORNIA 95814 UNITED STATES smn@dwgp.com	
Los Angeles Department of Water & Power	Philip Mone Of Counsel Van Ness Feldman LLP 1050 Thomas Jefferson Street, NW Washington, DISTRICT OF COLUMBIA 20007 UNITED STATES pwm@vnf.com	
Los Angeles Department of Water & Power		syndi driscoll Deputy City Attorney 221 North Figueroa St LOS ANGELES, CALIFORNIA 91002 syndi.driscoll@ladwp.com
Modesto Irrigation District	Martin Caballero Modesto Irrigation District P.O. Box 4060 Modesto, CALIFORNIA 95352 UNITED STATES martin.caballero@mid.org	Nena D Robinson Legal Assistant Duncan, Weinberg, Genzer & Pembroke PC DUNCAN WEINBERG GENZER & PEMBROKE PC 1667 K STREET, NW SUITE 700 WASHINGTON, DISTRICT OF COLUMBIA 20006 ndr@dwgp.com
Modesto Irrigation District	Sean Neal Attorney Duncan, Weinberg, Genzer & Pembroke PC 915 L Street Suite 1410 Sacramento, CALIFORNIA 95814 UNITED STATES smn@dwgp.com	James McFall jamesm@mid.org
Modesto Irrigation District	Lauren Perkins Duncan Weinberg Genzer Pembroke Duncan Weinberg Genzer & Pembroke, PC 915 L Street, Suite 1410 Sacramento, CALIFORNIA 95814 UNITED STATES lmp@dwgp.com	
Northern California Power Agency	Katharine Mapes Attorney Spiegel & McDiarmid LLP 1825 Eye Street N.W. 7th Floor Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES katharine.mapes@spiegelmc.com	Lisa Dowden Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 Lisa.Dowden@spiegelmc.com
Northern California Power Agency		Latif Nurani Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700

		Washington, DISTRICT OF COLUMBIA 20006 latif.nurani@spiegelmc.com
Northern California Power Agency		Benjamin N. Reiter Attorney Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 benjamin.reiter@spiegelmc.com
Northern California Power Agency		E Service Spiegel & McDiarmid LLP 1875 Eye St, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 eService@spiegelmc.com
Northern California Power Agency		Randy Howard Northern California Power Agency 651 Commerce Drive Roseville, CALIFORNIA 95678 Randy.Howard@ncpa.com
Pacific Gas and Electric Company	Charles Middlekauff Attorney Pacific Gas and Electric Company PO Box 7442 San Francisco, CALIFORNIA 94120-7442 UNITED STATES crmd@pge.com	Moshreq Sobhy Principal, Case Manager Transm Pacific Gas and Electric Company 77 Beale St. San Francisco, CALIFORNIA 94105 mzsr@pge.com
Pacific Gas and Electric Company		PG&E Law Dept FERC Cases INDIVIDUAL 77 Beale Street San Francisco, CALIFORNIA 94105 lawferccases@pge.com
PUBLIC CITIZEN, INC	Tyson Slocum Director Public Citizen's Energy Program 215 Pennsylvania Ave SE Washington, DISTRICT OF COLUMBIA 20003 UNITED STATES tslocum@citizen.org	
PUBLIC CITIZEN, INC	Tyson Slocum Director Public Citizen's Energy Program 215 Pennsylvania Ave SE Washington, DISTRICT OF COLUMBIA 20003 UNITED STATES tslocum@citizen.org	
San Diego Gas & Electric Company	Ross Fulton Senior Counsel San Diego Gas & Electric 8330 Century Park Court San Diego, CALIFORNIA 92123 UNITED STATES rfulton@sdge.com	Will Fuller CONTROLLER 8326 Century Park Ct San Diego, CALIFORNIA 92123 Middlesex wfuller@semprautilities.com
Southern California Edison Company	Rebecca Furman Attorney Southern California Edison Company PO Box 800 Rosemead, CALIFORNIA UNITED STATES rebecca.furman@sce.com	Jeffrey Nelson Manager of Market Design and A Southern California Edison Company 2244 Walnut Grove Ave. Rosemead, CALIFORNIA 91770 jeff.nelson@sce.com
Southern California Edison Company	Matthew Dwyer Southern California Edison Company 2244 Walnut Grove Ave. Rosemead, CALIFORNIA 91770	FERC Case Administration Southern California Edison Company 2244 Walnut Grove Ave.

	UNITED STATES matthew.dwyer@sce.com	Rosemead, CALIFORNIA 91770 ferccaseadmin@sce.com
State Water Contractors	Bhaveeta Mody Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, N.W. Suite 700 Washington, D.C., DISTRICT OF COLUMBIA 20006 UNITED STATES bkm@dwgp.com	Eric Chapman Deputy General Manager State Water Contractors 1121 L Street Suite 1050 Sacramento, CALIFORNIA 95814 echapman@swc.org
State Water Contractors	Lauren Perkins Duncan Weinberg Genzer Pembrok Duncan Weinberg Genzer & Pembroke, PC 915 L Street, Suite 1410 Sacramento, CALIFORNIA 95814 UNITED STATES Imp@dwgp.com	Nena D Robinson Legal Assistant Duncan, Weinberg, Genzer & Pembroke PC DUNCAN WEINBERG GENZER & PEMBROKE PC 1667 K STREET, NW SUITE 700 WASHINGTON, DISTRICT OF COLUMBIA 20006 ndr@dwgp.com
The Utility Reform Network (TURN)	Marcel Hawiger INDIVIDUAL marcel@turn.org	
Transmission Agency of Northern California	Michael Postar Attorney Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, N.W., Suite 700 Duncan Weinberg Genzer & Pembroke Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES mrp@dwgp.com	Nena D Robinson Legal Assistant Duncan, Weinberg, Genzer & Pembroke PC DUNCAN WEINBERG GENZER & PEMBROKE PC 1667 K STREET, NW SUITE 700 WASHINGTON, DISTRICT OF COLUMBIA 20006 ndr@dwgp.com
Transmission Agency of Northern California	Bhaveeta Mody Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, N.W. Suite 700 Washington, D.C., DISTRICT OF COLUMBIA 20006 UNITED STATES bkm@dwgp.com	
Transmission Agency of Northern California		Clarence R Hawkes, III Duncan, Weinberg, Genzer & Pembroke, P.C. 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 crh@dwgp.com

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