# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Southern California Edison Company's (U 338-E) Application for Approval of Advanced Metering Infrastructure Deployment Strategy and Cost Recovery Mechanism

A.05-03-\_\_\_ (Filed March 30, 2005)

# SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) APPLICATION FOR APPROVAL OF ADVANCED METERING INFRASTRUCTURE DEPLOYMENT STRATEGY AND COST RECOVERY MECHANISM

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Dated: March 30, 2005

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FOR APPROVAL OF ADVANCED METERING INFRASTRUCTURE
DEPLOYMENT STRATEGY AND COST RECOVERY MECHANISMS

I.

#### **INTRODUCTION**

In accordance with the California Public Utilities Commission's ("Commission") directives set forth in the Assigned Commissioner and Administrative Law Judge's Ruling Calling for a Technical Conference to Begin Development of a Reference Design and Delaying Filing Date of Utility Advanced Metering Infrastructure Applications issued on November 24, 2004 ("Ruling") and as modified by the ruling of Administrative Law Judge Michelle Cooke on March 2, 2005, granting SCE's request for an extension of this application until April 1, 2005, Southern California Edison Company ("SCE" or "Company") hereby files this Application seeking approval of its deployment strategy for advanced metering infrastructure ("AMI"). The testimony in support of this Application discusses SCE's vision and deployment strategy for AMI, as well as an analysis of the two best business case scenarios for a full and partial deployment of AMI, including the

methodologies and assumptions used in performing that analysis. The testimony also includes SCE's proposed cost recovery mechanism for the \$31 million costs estimated for the proposed deployment strategy.

#### II.

#### ORGANIZATION OF SCE'S TESTIMONY

The testimony submitted in support of this Application is comprised of three volumes of testimony and one volume of appendices:

Exhibit SCE-1: Business Vision, Management Philosophy, and Summary of Business Case Analysis

**Executive Summary** 

Chapter I: Introduction

Chapter II: SCE's Business Vision for Advanced Metering

Infrastructure

Chapter III: SCE's Management Philosophy for Investment in

Advanced Metering Infrastructure

Chapter IV: Summary of Business Case Analysis

Chapter V: Conclusion

Exhibit SCE-2: Technology and Market Assessment, Deployment Strategy, and Cost Recovery Proposal

Chapter I: Introduction

Chapter II: Current Technology and Market Assessment

Chapter III: Proposed Deployment Strategy

Chapter IV: Cost Recovery Proposal

Exhibit SCE-3: Advanced Metering Infrastructure Business Case Analysis

Chapter I: Introduction

Chapter II: Summary of Results

Chapter III: Overview of Best Full and Partial Deployment Scenarios

Chapter IV: Best Full Deployment Business Case Analysis

Chapter V: Best Partial Deployment Business Case Analysis

Chapter VI: Revenue Requirement and Customer Impact Analysis

### Exhibit SCE-4: Appendices Supporting Business Case Analysis

Appendix A: Witness Qualifications

Appendix B: AMI Technology Assumptions for Business Case

Analysis

Appendix C: Demand Response Approach and Assumptions

Appendix D: Avoided Cost Value Assumptions

Appendix E: Uncertainty and Monte Carlo Analysis Assumptions

Appendix F: Financial Assumptions

Appendix G: Business as Usual Base Case

Appendix H: Summary of Potential Benefits

Appendix I: Estimating Demand Savings from Real Time Pricing

Appendix J: Value of Service Loss Description

Appendix K: Rate Design and Bill Impact Analysis

#### III.

# SUMMARY OF SCE'S ADVANCED INTEGRATED METER DEVELOPMENT PROPOSAL

In compliance with the Ruling, SCE sets forth its proposal for its preferred deployment strategy for AMI in its service territory. This strategy was carefully developed based on a thorough and rigorous business case analysis of current AMI technology using the Commission's required and SCE's alternative assumptions. SCE's findings indicate that an integrated AMI solution that leverages additional commercially-available technologies has the potential to provide an effective platform for enhancing routine customer services, providing more sophisticated alternatives for load management and demand response, and increasing operational efficiencies and benefits. However, these enabling technologies have yet to be costeffectively packaged or integrated into a streamlined meter for application in the United States. Therefore, SCE has concluded that given its operational starting point, an investment in currently-available AMI technology is not cost effective for SCE's customers. Instead, SCE proposes to achieve significant increased operational and demand response benefits through a concerted and aggressive effort to develop an "advanced integrated meter" (AIM) that integrates additional technologies into the next generation of meters.

SCE's business vision for AMI seeks to undertake a deliberate, yet fast-paced effort to design and develop a new AIM platform that will better meet SCE's and its customer needs by integrating additional proven technologies. The goal of the AIM project will be to add significantly more functionality at the same or lower cost as today's solutions, in order to significantly increase benefits over the current AMI business case.

The AIM development will take a "clean sheet" approach to design a meter that provides additional functional capabilities not available in currently-available metering solutions, including the possible integration of load control, demand limiting, two-way communications, customer information displays, data storage, and/or other proven stand-alone technologies. SCE seeks to significantly increase overall durability and versatility of AMI by using open, extensible and multifunctional meter and communications platforms. The AIM project is expected to leverage commercially-available components through an open design for both the meter device and communications, to provide a flexible and sustainable technology platform during its long lifecycle. This is essential given recent and anticipated future technology developments in home connectivity, distribution grid intelligence, distributed generation, and broadband over power lines, all of which may interface with the AIM technology.

SCE has developed a detailed strategy and aggressive timeline for the AIM development project that allows for integrated meter design, prototype development, beta production, and pilot test before a new business case would be prepared for Commission approval of full deployment. If there are no major obstacles and the AIM technology delivers its promised improvements to the business case analysis, SCE envisions completing full deployment of the new AIM system no later than one to two years after the time that full deployment of today's AMI technology could be completed. SCE's customers would nevertheless be advantaged, despite this slight delay, given the superior attributes of the proposed AIM technology, including more durability, versatility and the ability to deliver significant improvements in system reliability, customer billing and service options, outage management and operational efficiencies.

This Application seeks authorization of the first two phases of this AIM development effort: Phase I (design and development of the meter) and Phase II

(beta development and pilot deployment). SCE estimates that the cost of Phase I will be approximately \$12 million and Phase II will be approximately \$19 million, for a total cost of \$31 million for the activities that are the subject of this Application. These phases will be followed by one subsequent phase, namely Phase III, which is actual deployment of the new meters following Commission approval of a new business case application to be submitted at the end of Phase II.

#### IV.

#### SUMMARY OF SCE'S RATEMAKING PROPOSAL

SCE seeks Commission approval of its cost recovery proposal. SCE seeks to establish the Advanced Integrated Meter Balancing Account ("AIMBA") to provide for the recovery of Phase I and Phase II recorded costs effective upon a Commission decision on this application. Similar to ratemaking principles applicable to other Commission-approved balancing accounts, the proposed operation of the AIMBA will ensure that no more and no less than SCE's recorded AIM-related revenue requirements for Phase I and Phase II activities are ultimately collected from customers. In the AIMBA each month, SCE will record the difference between the actual capital-related revenue requirement and the actual O&M costs incurred for AIM Phase I and Phase II activities and the Commission-authorized AIM-related revenue requirement collected in rates. Any under- or over-collections in the AIMBA will be returned to, or collected from, customers in the following year.

SCE proposes that the AIM-related revenue requirements will be collected in rates as one component of SCE's total distribution revenue requirement through SCE distribution rate levels. Regardless of the effective date of the Commission's decision on this application, SCE proposes to begin the actual rate recovery of the AIM-related revenue requirement on January 1, 2006, when all other authorized rate changes are consolidated. SCE will present its January 1st AIM-related revenue requirements to the Commission for approval at least 60 days in advance by Advice Letter. SCE proposes to consolidate the changes to its distribution rate levels to reflect the updated annual AMI-related revenue requirements in conjunction with other rate level changes in the annual Energy Resources Recovery Account ("ERRA") applications.

Pursuant to Commission-adopted review procedures for other SCE balancing accounts, SCE proposes that the recorded operation of the AIMBA be reviewed by the Commission in SCE's annual ERRA reasonableness applications to ensure that all entries to the account are stated correctly and are consistent with Commission decisions. Due to the uncertainties surrounding a successful outcome of our AIM Project as we proceed through the Phase I and Phase II tasks, or the possibility that a future Commission may change its view about deployment of AMI, Commission reasonableness review of the AIMBA should be limited to ensuring that all recorded costs are associated with Phase I and Phase II activities as defined and adopted by the Commission in this proceeding.

#### V.

#### **SUMMARY OF REQUESTS**

This Application seeks Commission approval of SCE's proposed AIM Project and cost recovery for expenditures incurred therein. SCE respectfully requests that the Commission:

- (1) Authorize SCE to design a customized advanced meter integrating additional functionality;
- (2) Authorize SCE to develop working prototypes of the new meter design;
- (3) Authorize SCE to conduct a beta test of production of the new meter design;
- (4) Authorize SCE to conduct a pilot deployment of the new meter design;
- (5) Authorize SCE to establish the Advanced Integrated Meter Balancing Account to provide for the recovery of Phase I and Phase II recorded costs effective upon a Commission decision on this application;
- (6) Authorize rate recovery, through distribution rate levels, of our forecast AIM-related revenue requirement for Phase I and Phase II activities beginning on January 1, 2006 and continuing through the completion of Phase II; and
- (7) Limit reasonableness review of the Advanced Integrated Meter Balancing Account to ensuring all recorded costs are associated with Phase I and Phase II activities as defined and adopted by the Commission in this proceeding.

#### VI.

#### STATUTORY AND PROCEDURAL REQUIREMENTS

#### A. Statutory and Procedural Authority

This application is made pursuant to the Commission's Rules of Practice and Procedure, the California Public Utilities Code, the Assigned Commissioner and Administrative Law Judge's Ruling Calling for a Technical Conference to Begin Development of a Reference Design and Delaying Filing of Utility Advanced Metering Infrastructure Applications issued on November 24, 2004, and the ruling of Administrative Law Judge Michelle Cooke on March 2, 2005, granting SCE's request for an extension of this application until April 1, 2005.

SCE's authority for this request is Sections 399.2, 451, 454, 491, 701, 728, and 729 of the Public Utilities Code of the State of California. SCE's request complies with Rules 2 through 2.5, which specify the procedures for the filing of documents, specifically:1

- 1. Form and size of tendered documents (Rule 2);
- 2. Caption, title, and docket number (Rule 2.1);
- 3. Signatures (Rule 2.2);
- 4. Service (Rule 2.3);
- 5. Verification (Rule 2.4); and
- 6. Copies (Rule 2.5).

Because this is a new application, no service list has yet been established. SCE is serving this application in accordance with the service directives on the service list established for R.02-06-001.

In addition, this request complies with Rules 6, 15, 16, 23, 24, 42, and prior decisions, orders and resolutions of this Commission.

#### B. SB 960 Requirements - Rule 6(a)(1)

Rule 6(a)(1) requires that applications filed after January 1, 1998 "shall state the proposed category for the proceeding, the need for hearings, the issues to be considered, and a proposed schedule." These requirements are discussed below.

#### C. <u>Proposed Categorization</u>

SCE proposes to characterize this proceeding as "ratesetting" as defined in Rule 5(c).

#### D. Need For Hearings and Proposed Schedule For Resolution of Issues

Given the time necessary to develop the new AIM product before SCE could file a new business case for a full deployment of AMI, SCE proposes that these issues be addressed as expeditiously as possible so that it may begin its meter design and development activities. Our proposed schedule assumes that there will be evidentiary hearings and briefing, although SCE anticipates that many of the issues addressed in this application may be resolved through settlement or stipulation or through written comments, depending on whether intervening parties dispute factual issues.

If the Commission believes evidentiary hearings are necessary, then SCE proposes the following schedule, which is extremely aggressive but provides the minimal amount of time necessary to allow SCE to begin its design and development activities by January 2006. Any delay to the following schedule would affect SCE's ability to begin these important tasks and would further delay SCE's eventual filing of a new business case and full deployment of AMI.

SCE files Application	March 30, 2005
Daily Calendar Notice Appears	April 2005
Prehearing Conference	April 15, 2005
ORA and Intervenors File Opening Testimony	May 6, 2005
SCE Reply Testimony Due	May 20, 2005
Hearings	May 30-June 3, 2005
Concurrent Opening Briefs Due	June 20, 2005
Concurrent Reply Briefs Due	July 1, 2005
Commission Issues Proposed Decision Due	August 1, 2005
Comments to Proposed Decision Due	August 21, 2005
Replies to Comments to Proposed Decision	September 1, 2005
Commission issues Final Decision	September 8, 2005

#### E. <u>Issues to be Considered</u>

The issues to be considered in this proceeding are described above and set forth in much greater detail in the attached Prepared Testimony. Major issues include:

- Whether to adopt SCE's deployment strategy, including SCE's efforts
  to undertake development of a customized "Advanced Integrated
  Meter" through a pilot deployment; and
- 2. Whether to adopt SCE's proposed ratemaking treatment for the recovery of the associated costs of SCE's proposed deployment strategy.

#### F. Legal Name and Correspondence – Rules 15(a) and 15(b)

Southern California Edison Company is an electric public utility organized and existing under the laws of the State of California. The location of SCE's principal place of business is 2244 Walnut Grove Avenue, Post Office Box 800, Rosemead, California 91770. SCE's attorneys in this matter are Jennifer

Hasbrouck and Laura Genao. Correspondence or communications regarding this application should be addressed to:

Jennifer R. Hasbrouck Senior Attorney Southern California Edison Company P.O. Box 800 2244 Walnut Grove Avenue Rosemead, California 91770 Telephone: (626) 302-1040

Facsimile: (626) 302-7740

e-mail: jennifer.hasbrouck@sce.com

To request a copy of this application, please contact:

Meraj Rizvi Southern California Edison Company P.O. Box 800 2244 Walnut Grove Avenue Rosemead, California 91770 Telephone: (626) 302-1063

Facsimile: (626) 302-1063 Facsimile: (626) 302-1048 E-mail: caseadmin@sce.com

#### G. Articles Of Incorporation – Rule 16

A copy of SCE's Restated Articles of Incorporation, as amended, and as presently in effect, certified by the California Secretary of State, was filed with the Commission on June 15, 1993, in connection with Application 93-06-022<sup>2</sup> and is incorporated herein by reference pursuant to Rule 16 of the Commission's Rules of Practice and Procedure.

A certificate of correction to the Restated Articles of Incorporation, amending Paragraph 5 of Exhibit I to the Articles, was filed with the Commission on

A.93-06-022, filed June 15, 1993, regarding approval of a Self-Generation Deferral Agreement between Mobil Oil Corporation, Torrance Refinery, and SCE.

September 19, 1997, in connection with Application 97-09-038, and is also incorporated herein by reference pursuant to Rule 16.

SCE's Articles of Incorporation were again amended on January 12, 2005, and were certified by the California Secretary of State. A copy of the certified amended Articles of Incorporation was filed with the Commission on January 20, 2005, in connection with Application 05-01-018,4 and is also incorporated herein by reference pursuant to Rule 16.

#### H. Balance Sheet and Income Statement - Rule 23(a)

Appendix A to this application contains copies of SCE's balance sheet as of December 31, 2004, and income statement for the period ended September 30, 2004, the most recent period available.

#### I. Present and Proposed Rates – Rule 23(b) and Rule 23(c)

The cost recovery mechanism proposal and the AIMBA's projected impact on rates are addressed in Exhibit SCE-2, incorporated herein by reference.

# J. <u>Description of SCE's Service Territory and Utility System - Rule</u> 23(d)

Because this submittal is not a general rate application, this requirement is not applicable.

#### K. Summary of Earnings – Rule 23(e)

Rule 23(e) requires:

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A.97-09-038, filed September 19, 1997, regarding expedited and *ex parte* approval of negotiated termination of certain Interim Standard Offer No. 4 Power Purchase Contracts.

<sup>4</sup> A.05-01-018, filed January 20, 2005, regarding default critical peak pricing rate design for large customers.

A summary of earnings (rate of return summary) on a depreciated rate base for the test period or periods upon which applicant bases its justification for an increase.

A Summary of Earnings was provided in SCE's General Rate Case Application, A.02-05-004, filed with the Commission on May 3, 2002, and is incorporated herein by this reference.

# L. Index of the Exhibits and Appendices to This Application – Rule 23(g)

SCE's submissions in support of this application include the following, which are incorporated herein by reference:

#### Appendices to Application

Appendix B List of Cities and Counties

#### Exhibits to Application

SCE-1	Business Vision, Management Philosophy, and Summary
	of Business Case Analysis
SCE-2	Technology and Market Assessment, Deployment
	Strategy, and Cost Recovery Proposal
SCE-3	Advanced Metering Infrastructure Business Case
	Analysis
SCE-4	Appendices to Testimony

#### M. <u>Depreciation - Rule 23(h)</u>

Because this submittal is not a general rate application, this requirement is not applicable.

#### N. Capital Stock and Proxy Statement - Rule 23(i)

Because this submittal is not a general rate application, this requirement is not applicable.

#### O. Statement Pursuant to Rule 23(1)

Rule 23(I) requires the applicant to state whether its request is limited to passing through to customers "only increased costs to the corporation for the services or commodities furnished by it." This application seeks only to pass through to SCE's customers the costs incurred by SCE in Phase I and II of its proposed AIM Project.

#### P. Service of Notice - Rule 24

A list of the cities and counties affected by the rate changes resulting from this application is attached as Appendix B. The State of California is also an SCE customer whose rates would be affected by the proposed revisions.

As provided in Rule 24, notice of filing of this application will be: (1) mailed to the appropriate officials of the state and the counties and cities listed in Appendix B; (2) published in a newspaper of general circulation in each county in SCE's service territory within which the rate changes would be effective; and (3) mailed to all customers affected by the proposed changes.

#### Q. Service List

SCE is serving this Application and its exhibits on all parties on the Commission's service list for proceeding R.02-06-001.

#### VII.

#### **CONCLUSION**

SCE has attached to this application all of the data required to support it and will provide orally or in writing any other information the Commission finds necessary to act on it. SCE respectfully requests that the Commission review this application on an expedited basis, according to the schedule proposed above.

Dated this 29th day of March, 2005, at Rosemead, California.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: Pamela A. Bass

Senior Vice President

MICHAEL D. MONTOYA JENNIFER R. HASBROUCK LAURA GENAO

By: Jennifer R. Hasbrouck

Attorneys for

SOUTHERN CALIFORNIA EDISON COMPANY

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E-mail: jennifer.hasbrouck@SCE.com

March 29, 2005

#### **VERIFICATION**

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of March, 2005, at Rosemead, California.

Pamela A. Bass Senior Vice President SOUTHERN CALIFORNIA EDISON COMPANY

**2244 Walnut Grove Avenue Post Office Box 800**Rosemead, California 91770

#### CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA** EDISON COMPANY'S (U 338-E) APPLICATION FOR APPROVAL OF ADVANCED METERING INFRASTRUCTURE DEPLOYMENT STRATEGY AND COST RECOVERY MECHANISMS on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

C 1150(1	betwee was effected by one of more means material below.			
	Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.			
	Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Commission or other addressee(s).			
	Placing copies in properly addressed sealed envelopes and depositing such copies in the United States mail with first-class postage prepaid to all parties.			
	Directing Prographics to place the copies in properly addressed sealed envelopes and to deposit such envelopes in the United States mail with first-class postage prepaid to all parties.			
Execu	ed this 30th Day of March, 2005, at Rosemead, California.			
	Meraj Rizvi			
	Case Analyst			
	SOUTHERN CALIFORNIA EDISON COMPANY			

2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770



March 30, 2005

Docket Clerk California Public Utilities Commission 505 Van Ness Avenue San Francisco, California 94102

RE: A.05-03-\_\_\_

Dear Docket Clerk:

Enclosed for filing with the Commission are the original and eight copies of the SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) APPLICATION FOR APPROVAL OF ADVANCED METERING INFRASTRUCTURE DEPLOYMENT STRATEGY AND COST RECOVERY MECHANISMS in the above-referenced proceeding.

We request that a copy of this document be file-stamped and returned for our records. A self-addressed, stamped envelope is enclosed for your convenience.

Your courtesy in this matter is appreciated.

Very truly yours,

Jennifer R. Hasbrouck

JRH:LW050680017.doc

Enclosures

cc: All Parties of Record in R.02-06-001

(U 338-E)

# APPENDIX A Southern California Edison Company's Balance Sheet and Income Statement

#### **BALANCE SHEET**

# **DECEMBER 31, 2004**

### ASSETS

(Millions of Dollars)

#### **UTILITY PLANT:**

Less - Accumulated depreciation and decommissioning	(4,506) 12,535
3	
Construction work in progress	789
Nuclear fuel, at amortized cost	151
	13,475
OTHER PROPERTY AND INVESTMENTS:	
Nonutility property, at cost - less accumulated provision	
for depreciation of \$34	583
Property of variable interest entities - net	377
Nuclear decommissioning trusts, at cost	2,757
Other Investments	170
	3,887
CURRENT ASSETS:	
Cash and equivalents	122
Restricted cash	61
Receivables, including unbilled revenues,	
less reserves of \$31 for uncollectible accounts	938
Fuel inventory	8
Materials and supplies	188
Accumulated deferred income taxes - net	134
Regulatory assets	553
Prepayments and other current assets	72
DEFERRED CHARGES:	2,076
DEFERINCE OF ITALOGUE.	
Regulatory assets	3,285
Other deferred charges	567
Ŭ	3,852
	\$23,290
APPENDIX A	

#### **BALANCE SHEET**

# DECEMBER 31, 2004

### **CAPITALIZATION AND LIABILITIES**

(Millions of Dollars)

#### CAPITALIZATION:

Common stock Additional paid-in capital Accumulated other comprehensive loss Retained Earnings Common shareholder's equity Preferred stock without mandatory redemption requirements Preferred stock with mandatory	\$2,168 350 (17) 2,020 4,521
redemption requirements	139
Long-term debt	<u>5,225</u> 10,014
OURDENT LIARUITIES	
CURRENT LIABILITIES:	
Preferred stock to be redeemed within one year	9
Long-term debt due within one year	246
Short-term debt	88
Accounts payable Accrued taxes	700 357
Accrued interest	115
Customer deposits	168
Book overdrafts	232
Regulatory liabilities - net	490
Other current liabilities	643
DEFERRED CREDITS:	3,048
Assumed the distance of the same states and	0.005
Accumulated deferred income taxes - net  Accumulated deferred investment tax credits	2,865 126
Customer advances and other deferred credits	510
Power purchase contracts	130
Accumulated provision for pensions and benefits	417
Asset retirement obligations	2,183
Regulatory liabilities	3,356
Other long-term liabilities	232
Other long term habilities	9,819
Minority interest	409
	\$23,290

### STATEMENT OF INCOME

### YEAR ENDED DECEMBER 31, 2004

# (Millions of Dollars)

OPERATING REVENUE	\$8,448
OPERATING EXPENSES:	
Fuel	810
Purchased power	2,332
Provisions for regulatory adjustment clauses - net	(201)
Other operation and maintenance expenses	2,457
Depreciation, decommissioning and amortization	860
Property and other taxes	177
Total operating expenses	6,435
OPERATING INCOME	2,013
Interest and dividend income	20
Other nonoperating income	84
Interest expense - net of amounts capitalized	(409)
Other nonoperating deductions	(69)
INCOME BEFORE TAX AND MINORITY INTEREST	1,639
INCOME TAX	438
MINORITY INTEREST	280
NET INCOME	921
DIVIDENDS ON PREFERRED STOCK - NOT SUBJECT TO	
MANDATORY REDEMPTION	6
EARNINGS AVAILABLE FOR COMMON STOCK	\$915

APPENDIX B List of Cities and Counties

Citizens or some of the citizens of the following counties and municipal corporations will or may be affected by the changes in rates proposed herein.

		COUNTIES		
Fresno	Kings	Orange	Tuolumne*	
Imperial	Los Angeles	Riverside	Tulare	
Inyo	Madera	San Bernardino	Ventura	
Kern	Mono	Santa Barbara		

MUNICIPAL CORPORATIONS					
Adelanto	Cudahy	La Habra	Ojai	Santa Monica	
Agoura Hills	Culver City	La Habra Heights	Ontario	Santa Paula	
Alhambra	Cypress	La Mirada	Orange	Seal Beach	
Aliso Viejo	Delano	La Palma	Oxnard	Sierra Madre	
Apple Valley	Desert Hot Springs	La Puente	Palm Desert	Signal Hill	
Arcadia	Diamond Bar	La Verne	Palm Springs	Simi Valley	
Artesia	Downey	Laguna Beach	Palmdale	South El Monte	
Avalon	Duarte	Laguna Hills	Palos Verdes Estates	South Gate	
Baldwin Park	El Monte	Laguna Niguel	Paramount	South Pasadena	
Barstow	El Segundo	Laguna Woods	Perris	Stanton	
Beaumont	Exeter	Lake Elsinore	Pico Rivera	Tehachapi	
Bell	Farmersville	Lake Forest	Placentia	Temecula	
Bell Gardens	Fillmore	Lakewood	Pomona	Temple City	
Bellflower	Fontana	Lancaster	Port Hueneme	Thousand Oaks	
Beverly Hills	Fountain Valley	Lawndale	Porterville	Torrance	
Bishop	Fullerton	Lindsay	Rancho Cucamonga	Tulare	
Blythe	Garden Grove	Loma Linda	Rancho Mirage	Tustin	
Bradbury	Gardena	Lomita	Rancho Palos Verdes	Twentynine Palms	
Brea	Glendora	Long Beach	Rancho Santa Margarita	Upland	
Buena Park	Goleta	Los Alamitos	Redlands	Victorville	
Calabasas	Grand Terrace	Lynwood	Redondo Beach	Villa Park	
California City	Hanford	Malibu	Rialto	Visalia	
Calimesa	Hawaiian Gardens	Mammoth Lakes	Ridgecrest	Walnut	
Camarillo	Hawthorne	Manhattan Beach	Rolling Hills	West Covina	
Canyon Lake	Hemet	Maywood	Rolling Hills Estates	West Hollywood	
Carpinteria	Hermosa Beach	McFarland	Rosemead	Westlake Village	
Carson	Hesperia	Mission Viejo	San Bernardino	Westminster	
Cathedral City	Hidden Hills	Monrovia	San Buenaventura	Whittier	
Cerritos	Highland	Montclair	San Dimas	Woodlake	
Chino	Huntington Beach	Montebello	San Fernando	Yorba Linda	
Chino Hills	Huntington Park	Monterey Park	San Gabriel	Yucaipa	
Claremont	Indian Wells	Moorpark	San Jacinto	Yucca Valley	
Commerce	Industry	Moreno Valley	San Marino		
Compton	Inglewood	Murrieta	Santa Ana		
Corona	Irvine	Newport Beach	Santa Barbara		
Costa Mesa	Irwindale	Norco	Santa Clarita		
Covina	La Canada Flintridge	Norwalk	Santa Fe Springs		

\*SCE provides electric service to a small number of customer accounts in Tuolumne County and is not subject to franchise requirements.