



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

**FILED**

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Application of Southern California Edison  
Company (U 338-E) for Authority to Increase  
Rates for its Class C Catalina Water Utility and  
Recover Costs from Water and Electric Customers

A.20-10-018

**SOUTHERN CALIFORNIA EDISON COMPANY'S**  
**(U 338-E) AFTER-THE-FACT NOTICE OF EX PARTE COMMUNICATION**

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Dated: **December 11, 2023**

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STATE OF CALIFORNIA**

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Company (U 338-E) for Authority to Increase  
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**SOUTHERN CALIFORNIA EDISON COMPANY’S  
(U 338-E) AFTER-THE-FACT NOTICE OF EX PARTE COMMUNICATION**

Southern California Edison Company (SCE) hereby gives notice pursuant to Rule 8.4(a) of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission) of the following communication.

**DATE and TIME OF COMMUNICATION:** December 7, 2023 from 3:00 p.m. to 3:30 p.m.

**LOCATION:** Webex

**WHO INITIATED COMMUNICATION:** SCE

**NAMES AND TITLES OF NON-CPUC PERSONS PRESENT:**

- (1) Russell Archer, Director, General Rate Case
- (2) Marissa Blunschi, Principal Manager, State Regulatory Relations

**NAMES AND TITLES OF CPUC PERSONS PRESENT:**

- (1) Ritta Merza, Legal and Policy Advisor to Commissioner Genevieve Shiroma

**BRIEF DESCRIPTION OF COMMUNICATION:**

SCE explained that the proposed 10- and 15-year amortization periods financed with a 90-day commercial paper interest rate was inconsistent with how SCE would have to finance these costs, and that the Commission should instead permit SCE to recover these costs at the Commission authorized weighted average cost of capital. SCE also noted the importance of

making clear that any decision on cost recovery in this proceeding is non-precedential and limited to the unique circumstances present only at Catalina.

SCE then recommended that the Commission should adhere to the Standard Practice and continue to classify Catalina Water as a Class C water utility. SCE noted that classifying Catalina as a Class B water utility was unnecessary and would result in higher costs for water customers because of increased regulatory requirements. SCE also explained that requiring a separate water loss application for Catalina was unnecessary and unprecedented, and that Catalina should not be held to the 7% water loss standard meant for Class A water utilities. Finally, SCE recommended that the Commission permit full recovery of the costs recorded in SCE's drought-related memorandum accounts. SCE explained that these costs were necessarily incurred to provide safe and reliable water to customers through a historic drought and should be recoverable.

**WRITTEN MATERIALS PROVIDED:** None

Respectfully submitted,

CLAIRE E. TORCHIA  
PAUL I. SUNG

/s/ Paul I. Sung

By: Paul I. Sung

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