

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA



**FILED**

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ADMINISTRATIVE LAW JUDGE GARRETT TOY, presiding

	)	EVIDENTIARY
	)	HEARING
Application of Southern California	)	
Edison Company (U338E) for Authority	)	
to Increase Rates for its Class C	)	
Catalina Water Utility and Recover	)	Application
Costs from Water and Electric	)	20-10-018
Customers.	)	
	)	
	)	

REPORTERS' TRANSCRIPT  
Virtual Proceeding  
March 2, 2022  
Pages 454 - 528  
Volume 5

Reported by: Karly Powers, CSR No. 13991  
Rebekah L. DeRosa, CSR No. 8708  
Lisa Welch, CSR No. 10928

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VIRTUAL PROCEEDING

MARCH 2, 2022 - 9:01 A.M.

\* \* \* \* \*

ADMINISTRATIVE LAW JUDGE TOY: We'll go  
on the record.

It's 9:01 a.m. on March 2nd, 2022.  
This is the time and place for the  
continuation of evidentiary hearings in  
Application 20-10-018, Southern California  
Edison's Application for General Rate Case  
for the Catalina Water Utility.

And we have, to start, additional  
exhibits that need to be marked and  
identified, starting with Cal Advocates.

I have an exhibit preliminarily  
marked Cal Advocates-X-11 titled "Excerpt  
From Commission Standard Practice U-7-W."  
And I'll be marking that as Cal  
Advocates-X-11.

(Exhibit No. Cal Advocates-X-11 was  
marked for identification.)

ALJ TOY: I have an exhibit  
preliminarily marked Cal Advocates-X-12  
titled "Resolution W-4665 (SCE Catalina  
General Rate Increase)," and I'll be marking  
that as Cal Advocates-X-12.

(Exhibit No. Cal Advocates-X-12 was  
marked for identification.)

1           ALJ TOY:   And I have an exhibit  
2           preliminarily marked Cal Advocates-X-13  
3           titled "Excerpts from A-" -- excuse me,  
4           "A.10-11-009, Attachment to Joint Motion For  
5           Approval of Settlement (Rate Design Issues),"  
6           and I'll be marking that as Cal  
7           Advocates-X-13.

8                     (Exhibit No. Cal Advocates-X-13 was  
9                     marked for identification.)

10          MS. FISHER:   Your Honor, could I say  
11          something about that exhibit?

12          ALJ TOY:    Sure.

13          MS. FISHER:   This is Emily Fisher.

14                 I've identified that as a proposed  
15          exhibit, just to make sure that it was  
16          acceptable to SCE and the parties. I wanted  
17          to find language from the all-party  
18          settlement from the previous GRC, and the  
19          best I could find yesterday was an attachment  
20          to -- actually, a -- a motion filed by the  
21          parties in that proceeding, rather than an  
22          attachment to the Commission's decision  
23          approving the settlement. So I apologize.  
24          It was a little complicated there, but I  
25          believe the language is similar.

26          ALJ TOY:    Okay. Does SCE have any  
27          comment on that?

28          MR. SUNG:    No, your Honor. We wouldn't

1 object to the marking of this exhibit.

2 ALJ TOY: Okay. Do any of the other  
3 parties have any comments?

4 MR. BISHTON: No problem, your Honor.

5 MS. FISHER: Great. Thank you.

6 ALJ TOY: Okay. Continuing on, we have  
7 an exhibit preliminarily marked CP-16-E2  
8 titled "SCE Water Produced, Water Sold and  
9 System Water Loss, 2004 to 2021." This is on  
10 behalf of the Catalina parties.

11 MR. BISHTON: Yes, your Honor.  
12 Mr. Medenez (phonetic) took to your  
13 suggestion, and attached now to -- it was 16E  
14 that we withdrew all of the schedules from  
15 all of the an -- annual reports, Edison  
16 annual reports, that substantiate that are  
17 reflected in the spreadsheet. They're all  
18 attached to this exhibit. And I personally  
19 verified every number taken from those  
20 schedules.

21 (Reporter clarification.)

22 MR. BISHTON: Your Honor, I -- I had my  
23 IT people check my microphone and everything  
24 else today. I'm speaking right -- right in  
25 front of me. Can she hear me okay now?

26 (Reporter clarification.)

27 MR. BISHTON: Okay. Your Honor, this  
28 exhibit is -- I attached all of the schedules

1 referenced in the exhibit from the annual  
2 reports. They're all attached with a cover  
3 sheet for every one so that they're clearly  
4 identified. I personally checked all of the  
5 numbers. This is the correct exhibit, and we  
6 would appreciate it be marked.

7 ALJ TOY: Okay. Does SCE have any  
8 comment on the exhibit?

9 MR. SUNG: We would not object to the  
10 marking of the exhibit, your Honor, but I --  
11 given that the exhibit itself was not  
12 actually used during Mr. Hite's testimony, we  
13 may -- we will reserve objections to its  
14 admission.

15 ALJ TOY: Okay. I'll mark it as  
16 CP-16-E2, for now.

17 (Exhibit No. CP-16-E2 was marked for  
18 identification.)

19 ALJ TOY: Okay. Off the record.

20 (Off the record.)

21 ALJ TOY: Back on the record.

22 We will now hear the testimony of  
23 Mr. Behlihomji.

24 Could you please state your name,  
25 spelling it, your place of business, and on  
26 whose behalf your testimony is for?

27 MR. BEHLIHOMJI: My full name is Reuben  
28 Behlihomji, R-e-u-b-e-n B-e-h-l-i-h-o-m-j-i.

1 My place of business is 8631 Rush Street for  
2 Southern -- Rosemead, California 90 -- hold  
3 on. I forget the ZIP code.

4 ALJ TOY: You're breaking up a little  
5 bit, Mr. Behlihomji.

6 MR. BEHLIHOMJI: Sorry.

7 Okay. Can you -- can you guys hear  
8 me now? Sorry, your Honor.

9 ALJ TOY: Yes, that's better.

10 MR. BEHLIHOMJI: Okay. I'll start over  
11 again.

12 My name is Reuben Behlihomji,  
13 R-e-u-b-e-n, last name B-e-h-l-i-h-o-m-j-i.  
14 Place of business is 2244 Walnut Grove  
15 Avenue, and I work at Southern California  
16 Edison.

17 ALJ TOY: Thank you. Could you please  
18 read the witness attestation in front of you?

19 MR. BEHLIHOMJI: Yes.

20 I do solemnly state under penalty of  
21 perjury the testimony I give in the case now  
22 pending before this Commission shall be the  
23 truth, the whole truth, and nothing but the  
24 truth.

25 I attest I will testify based on my  
26 knowledge -- my own knowledge and memory,  
27 free from external influences or pressures.

28 I attest I will adhere to all formal

1 requirements of testifying under oath,  
2 including the prohibition against being  
3 coached.

4 I attest I will only refer to any  
5 materials provided by the parties, exhibits  
6 premarked and identified by the parties and  
7 previously shared with the opposing party.

8 I attest I will not make any  
9 recording of the proceeding.

10 I attest I understand that any  
11 recording of a proceeding held by Webex,  
12 including screenshots or other visual copying  
13 of a hearing, is absolutely prohibited.

14 I attest that I understand that  
15 violation of these prohibitions may result in  
16 sanctions, including removal from the  
17 evidentiary hearing, restricted entry to  
18 future hearings, denial of entry to future  
19 hearings, or any other sanction deemed  
20 necessary by the Commission.

21 I attest I will not engage in any  
22 private communications by phone, text or  
23 e-mail, any other mode of communication,  
24 while under oath and being examined.

25 If I witness -- if I experience any  
26 attempts to tamper with my witness testimony,  
27 I will report the occurrence to the presiding  
28 officer immediately.



1 ALJ TOY: Thank you.

2 REUBEN BEHLIHOMJI, called as a  
3 witness by Southern California Edison  
4 Company, having been affirmed,  
5 testified as follows:

6 ALJ TOY: SCE, your witness.

7 MR. SUNG: Thank you, your Honor.

8 DIRECT EXAMINATION

9 BY MR. SUNG:

10 Q Good morning, Mr. Behlihomji.

11 A Good morning, Paul.

12 Q Are you sponsoring written  
13 testimony in this proceeding?

14 A Yes, I am, Mr. Sung.

15 Q Is it correct that you are  
16 sponsoring Section 1-A through C-3 and  
17 Section C-5 through C-10 of SCE's rate  
18 testimony labeled SCE-07, and Section 9 of  
19 SCE's rebuttal testimony labeled SCE-10, as  
20 identified in the table of contents?

21 A Yes, Mr. Sung.

22 Q Was this material prepared by you  
23 or under your direction?

24 A Yes, Mr. Sung.

25 Q And can you -- do you have any  
26 correction -- do you have any corrections  
27 that you'd like to make to your testimony at  
28 this time?

A No, Mr. Sung.

1           Q    To the extent that your testimony  
2   is factual, do you believe it to be true and  
3   correct?

4           A    Yes, Mr. Sung.

5           Q    To the extent your testimony  
6   reflects an opinion or judgment, does it  
7   reflect your best professional opinion or  
8   judgments?

9           A    Yes, Mr. Sung.

10          MR. SUNG: Your Honor, this witness is  
11   available for cross-examination.

12          ALJ TOY: Great. Thank you.

13                Is the Public Advocates Office ready  
14   to conduct their cross?

15          MS. FISHER: Emily Fisher for Public  
16   Advocates. Yes, your Honor.

17          ALJ TOY: And could Ms. Fisher please  
18   be given the presenter status?

19          MS. FISHER: Should I wait for that,  
20   your Honor?

21          ALJ TOY: No, continue, for now.

22          MS. FISHER: Okay.

23                       CROSS-EXAMINATION

24   BY MS. FISHER:

25           Q    Good morning, Mr. Behlihomji.

26           A    Good morning, Ms. Fisher. Can you  
27   hear me?

28           Q    Yes, I can hear you clearly. Thank

1     you.

2                     Mr. Behlihomji, it's -- it's your  
3     position that -- in testimony that SCE  
4     largely proposes to maintain the rate  
5     structures and principles adopted in its  
6     previous two general rate cases. Is that  
7     correct? ]

8             A     Yes. That is correct, Ms. Fisher.

9             Q     And, first, I would like to just  
10    follow up on an issue that arose last  
11    Thursday during my cross-examination of Ms.  
12    Barcinas. We got over into your territory a  
13    little bit, talking about residential and  
14    non-residential customer rates.

15                    So, could you please turn to  
16    Exhibit SCE-07, page 2?

17             A     Yes, I am there.

18             Q     And starting at line 7, you state  
19    that:

20                             Rate design for Catalina aligns  
21                             revenue recovery with average  
22                             usage -- excuse me -- average  
23                             usage distribution among customer  
24                             classes.

25                             Is that correct?

26             A     That is correct.

27             Q     And this means that SCE's rates are  
28    already set up so that commercial customers

1 can pass the cost of water on to the  
2 visitors; is that right?

3 A I think from a purpose of revenue  
4 allocation, the rates are set up in a manner  
5 to ensure that revenue allocation follows the  
6 distribution between residential and  
7 non-residential customers. And in so much as  
8 non-residential customers -- which is the  
9 commercial class -- is exposed to a  
10 tourist-based economy with visitors coming to  
11 the island, then, yes, there is the  
12 propensity of that passthrough mechanism of  
13 what we experience in rates to visitors  
14 visiting the island.

15 Q Thank you. And along those lines,  
16 at line 8 on that page, you indicate that  
17 under the rate design, commercial customers  
18 can flow through increases in water rates to  
19 visitors who benefit from SCE's water system  
20 during their trips to Catalina; is that  
21 correct?

22 A Correct. Yes, Ms. Fisher.

23 Q So doesn't this mean then that  
24 visitors to the island already pay for the  
25 water use when they pay their restaurant and  
26 lodging bills?

27 MR. SUNG: Objection. Calls for  
28 speculation.

1 MS. FISHER: I'll rephrase.

2 Q If commercial customers can flow  
3 through increases in water rates to visitors,  
4 -- isn't it reasonable to expect that the  
5 commercial customers would be passing on the  
6 costs of their water to their customers?

7 A So there is a propensity for that,  
8 Ms. Fisher. I don't know the specifics of  
9 how their business models are set up. But in  
10 so much as they experience those costs, and  
11 then so choose, as part of their business  
12 models, to flow through those costs to the  
13 visitors, then, yes, that is accurate.

14 Q Thank you.

15 And the restaurant and lodging  
16 clientele are not hypothetical visitors; but  
17 they would be known, actual visitors to the  
18 island who are directly benefitting from  
19 Catalina water services; is that correct?

20 MR. SUNG: Objection, your Honor. This  
21 goes beyond the scope of Mr. Behlihomji's  
22 testimony. He's here to testify about the  
23 rate design, not the types of customers on  
24 Catalina Island or types of lodging.

25 ALJ TOY: Do you have a response, Ms.  
26 Fisher?

27 MS. FISHER: I'll withdraw that  
28 question.

1           Q    Okay. Mr. Behlihomji, could you  
2           please refer to Exhibit SCE-07, page 9?

3           A    I'm there, Ms. Fisher.

4           Q    And starting at line 1, on page 9,  
5           you state that:

6                     Catalina Water customers are  
7                     strict practitioners of water  
8                     conservation.

9                     Is that correct?

10          A    That is correct, Ms. Fisher.

11          Q    And you would agree that  
12          conservation is one of the key goals of rate  
13          design; is that correct?

14          A    It is one of the many principles we  
15          try to design rates to, yes.

16          Q    But would you agree that on  
17          Catalina Island, conservation is particularly  
18          important?

19          A    I would say: Yes, it is.

20          Q    And would you agree that one of the  
21          mechanisms for incentivizing conservation is  
22          through the rate tiers?

23          A    The rate tiers are our mechanism  
24          for incentivizing a conservation signal, in  
25          so much as we designed those tiers in such a  
26          manner that is viewed in conjunction with the  
27          other principles of rate design, yes.

28          Q    So would you agree then that the

1 rate tiers promote conservation by  
2 incentivizing decreased usage?

3 A I would say in planning block tiers  
4 as a policy, yes, they do incentivize  
5 customers to conserve and reduce consumption,  
6 so as not to be exposed to the higher tiers.

7 Q Thank you.

8 And Tier 3, or SCE's highest-priced  
9 tier, is currently triggered at 6500 gallons;  
10 is that correct?

11 A That is correct, Ms. Fisher.

12 Q Mr. Behlihomji, if Tier 3 -- if the  
13 Tier 3 threshold were lower, wouldn't --  
14 wouldn't more customers be included in that  
15 tier?

16 A I think when we establish tiers,  
17 it's a cumulative distribution function of  
18 usage. So I would say that the volume, if  
19 you lowered the tier threshold, you would get  
20 a lower volume in that higher tier. I would  
21 be speculating to guess, at this point, if  
22 more customers or less customers would be  
23 included, based on how each -- how the  
24 customer distribution flows across that  
25 volume distribution. But a lot of the tier  
26 setting that we do is volume-based.

27 Q But you would agree that with a  
28 lower tier threshold, the potential to

1 capture a greater number of customers is  
2 higher?

3 A I would say the potential to  
4 capture a greater volume of customers' usage  
5 is higher. That's how I would phrase it.

6 Q Okay. So then if Tier 3 were  
7 lowered to 6,000 gallons, rather than 6500,  
8 would that send a price signal to more  
9 customers to reduce consumption?

10 A Well, I think the issue, Ms.  
11 Fisher, when you're thinking about these  
12 things is, you have bring into consideration  
13 all the aspects of rate design. And it's how  
14 you design your fixed charges, balanced with  
15 how you design your volumetric recovery  
16 through the rates, how you want to design  
17 your season, I think it's the combination of  
18 all of these factors that drive  
19 eventually will be that so-called high tier  
20 price signal. Now, in so much as you're  
21 reducing the tier threshold for Tier 3, then  
22 the combination of all those effects, as then  
23 effectuated in the price of that Tier 2,  
24 would then make the determination of whether  
25 it's a good enough incentive, a reasonable  
26 incentive, or should you move the incentive a  
27 little bit further from a price standpoint.

28 Q Thank you.



1                   Is it true, Mr. Behlihomji, that  
2                   SCE relies on Public Utilities Code 739.1  
3                   regarding electrical pricing?

4                   A     Yes, Ms. Fisher.

5                   Q     But isn't there a more recent  
6                   Commission decision regarding appropriate  
7                   water that would be applicable to water  
8                   utilities, rather than using an electric  
9                   utility statute?

10                  A     Could you help clarify that?

11                             Are you talking about it specific  
12                   from a standpoint of setting the tier levels,  
13                   Ms. Fisher?

14                  Q     This applies to the tier  
15                   breakpoints for volumetric rates.

16                  A     Okay.

17                  Q     And you agree that SCE relies on  
18                   Public Utilities Code Section 739.1?

19                  A     For setting our electric rates,  
20                   yes.

21                  Q     Does SCE also rely on this statute  
22                   for water utility purposes?

23                  A     I think we use it as a guide to  
24                   fashion our thinking on trying to determine  
25                   what we think is an appropriate volume. And  
26                   it's a range, obviously; when you're thinking  
27                   about these things, Ms. Fisher, it's a range.  
28                   So when you're trying to determine what your

1 Tier 1 volume of usage can -- can be  
2 reasonably set at, we use that as a guide.  
3 In so much as we're within that range, we  
4 think it's appropriate. Because you want --  
5 you want to set Tier 1 volumes, Tier 2  
6 volumes, and Tier 3 volumes in a manner that  
7 reasonably designs the price incentive of the  
8 customers that you're trying to design rates  
9 from.

10 Q Okay. But isn't there a more  
11 recent applicable Commission decision that  
12 determines affordability for water utilities,  
13 as far as tiered rate points?

14 A Are you referring, Ms. Fisher, to  
15 D.20-07-032?

16 Q That is correct.

17 A Okay. Yes. In that decision,  
18 there was a set level for essential use  
19 established by the Commission.

20 Q Thank you.

21 If you could please refer to  
22 page 88 (sic) of Exhibit SCE-10,  
23 Mr. Behlihomji?

24 ALJ TOY: Sorry, Ms. Fisher. Could you  
25 please repeat the page number?

26 MS. FISHER: Sure. Page 98 of SCE --  
27 Exhibit SCE-10.

28 THE WITNESS: Yes, Ms. Fisher. I'm

1       there.

2       BY MS. FISHER:

3               Q     Okay.  And starting at line 15 on  
4     page 98, you refer to Resolution W-4665,  
5     which was the Commission's decision in the  
6     Catalina general rate proceeding the time  
7     before last; correct?

8               A     That is correct.  Yes.

9               Q     And you state that:

10                       Based on resolution -- based on  
11                       this resolution, Catalina should  
12                       not be forced to adhere with the  
13                       progressive ratios recommended by  
14                       Standard Practice U-7-W.

15                       Is that correct?

16               A     That is correct.  Yes.  That is  
17     correct.

18               Q     Thank you.

19                       Is it your understanding that the  
20     reasoning for this in the resolution was that  
21     applying the progressive ratios would lead to  
22     some customers receiving more than twice the  
23     annual increase for the whole system?

24               A     I think that's one of the concerns.  
25     And the other concern is, I think, that when  
26     you look at Standard Practice Manual U-7  
27     (sic), it gives you a guidance on what we  
28     should do for the -- setting those ratios

1 from a recovery standpoint. But, yes, one of  
2 the -- one of the concerns is the violation  
3 of that principle.

4 Q But didn't -- didn't the resolution  
5 also indicate that with each successive rate  
6 increase, the Commission expected Catalina to  
7 approach the ratios in Standard Practice  
8 U-7-W?

9 A Yes. The resolution does state  
10 that, Ms. Fisher. ]

11 MS. FISHER: Your Honor, could I go off  
12 the record for just a minute.

13 ALJ TOY: Sure. Off the record.

14 (Off the record.)

15 ALJ TOY: Back on the record.

16 Please continue, Ms. Fisher.

17 BY MS. FISHER:

18 Q I would like to share Cal Advocates  
19 cross-exhibit Cal Advocates-X-13. And let me  
20 pull that up.

21 Is that showing up? I can't --

22 ALJ TOY: Off the record.

23 (Off the record.)

24 ALJ TOY: Back on the record.

25 BY MS. FISHER:

26 Q So, Mr. Behlihomji, I'm sharing  
27 what has been marked as Cal Advocates-X-13.  
28 And this consists of attachments to a joint

1 motion of parties in the previous general  
2 case that contains a summary and language  
3 from the all-party settlement.

4 And I am going to turn to page --  
5 pages 3 and 4. They show up as pages 6 and 7  
6 of the actual exhibit.

7 You're on page -- on page 4 it  
8 states that "An increase in the fixed charge  
9 will insure that residential ratepayers who  
10 only occupy their residences for part of the  
11 year will bear a more equitable share of the  
12 fixed costs."

13 Can you see that, Mr. Behlihomji?

14 A Yes, I can, Ms. Fisher.

15 Q And SCE's current fixed versus  
16 volumetric allocation allocates 70 percent  
17 volumetric to 30 percent fixed. Is that  
18 correct?

19 A That is correct.

20 Q And you said earlier that you  
21 are -- it's your recommendation that the  
22 Commission adopt largely the rate design  
23 principals from the previous rate  
24 proceedings -- the previous rate cases; is  
25 that correct?

26 A I think in those discussions,  
27 Ms. Fisher, the broader considerations of all  
28 parameters of rate design were taken into the

1 discussion in terms of I think the issues  
2 that were discussed in that settlement were  
3 pretty much consistent with some of the  
4 issues we're facing today in terms of the  
5 fixed versus volumetric, the allocation  
6 between residential and non-residential, the  
7 ratio in terms of how you want to set the  
8 tiers at the baseline level. A lot of those  
9 same discussions happen in those settlements.  
10 And so we've largely adhered to the same  
11 principals and the setting of rates in this  
12 proceeding as well.

13 Q But do you agree with the statement  
14 made in the previous rate proceeding that  
15 increased -- increases in the fixed charge  
16 insures equity between residential customers  
17 who are part-time on the island versus  
18 year-round?

19 A Yes. When viewed in isolation,  
20 conceptionally the increase in fixed charge  
21 will insure equity, yes.

22 Q And in addition to the fixed versus  
23 volumetric charges, is it your understanding  
24 that seasonal rates for residential customers  
25 as currently exists in SCE's rate design  
26 doubles the volumetric rate for low-income  
27 customers during the summer session?

28 A Can I go back to my testimony on

1 the -- the impacts that we presented and just  
2 review that with you?

3 Q Actually, if we could turn to -- I  
4 believe it's Appendix B to Exhibit SCE-07.

5 A And I was specifically referring to  
6 in SCE-07.

7 Now, you're looking at the care  
8 schedule, Ms. Fisher?

9 Q That's correct. It's page B-2.  
10 And in the middle of the page it shows per  
11 meter per month December season and winter  
12 season.

13 A One second. I'm just getting  
14 there. Yes, I see that.

15 Q And do you agree then that this --  
16 according to this schedule during the summer  
17 season rates for Care customers approximately  
18 double?

19 A That is correct, yes.

20 MS. FISHER: And if I could ask to go  
21 off the record just one more time briefly,  
22 your Honor.

23 ALJ TOY: Off the record.

24 (Off the record.)

25 ALJ TOY: Back on the record.

26 Please continue.

27 MS. FISHER: This is Emily Fisher with  
28 Public Advocates.

1                   No further questions at this time.

2                   Thank you, Mr. Behlihomji.

3                   WITNESS BEHLIHOMJI: Thank you,  
4                   Ms. Fisher.

5                   ALJ TOY: Does SCE have redirect?

6                   MR. SUNG: Yes, your Honor.

7                   ALJ TOY: Continue when ready.

8                   REDIRECT EXAMINATION

9                   BY MR. SUNG:

10                  Q     Mr. Behlihomji, in Resolution 4665  
11                   referenced by Ms. Fisher, the Commission  
12                   found that foreseeing adherence with the  
13                   progressive ratios found in Standard  
14                   Practice 7 would lead to the violation of the  
15                   principle that no customer would receive more  
16                   than twice the average increase for the whole  
17                   stem. Correct?

18                  A     That is correct, Mr. Sung, yes.

19                  Q     And why doesn't it make sense, in  
20                   your opinion, to go to the progressive ratios  
21                   that's been recommended by the Cal Advocates?

22                  A     In my opinion, Mr. Sung, when you  
23                   are designing rates and you're trying to look  
24                   at the impact of revenue increases and how  
25                   those revenue increases then effectuate  
26                   through the process of rate design, you're  
27                   thinking about the continuum of choices and  
28                   the continuum of parameters that go into the



1 design of rates and trying to balance the  
2 impact of each perimeter on a customer's  
3 bill. So in so much as looking at one  
4 particular aspect in this particular case,  
5 the ratios for the fixed charges and then  
6 increasing it to the standard practice manual  
7 we feel would be too much or too expansive a  
8 stretch in terms of the movements from where  
9 we are to where Cal Advocates is proposing as  
10 part of their testimony.

11 Q Mr. Behlihomji, have you had a  
12 chance to review the Cal Advocates'  
13 recommended ratios which are consistent with  
14 Standard Practice 7?

15 A Yes, I have.

16 Q And if the Commission were to adopt  
17 Cal Advocates' recommended ratios, would that  
18 lead to a violation of this principle we  
19 discussed?

20 A Yes, it would. For -- I think the  
21 first three line items or pipe sizes would  
22 generally be within the bandwidth, but all of  
23 the others would exceed the greater than two  
24 times impact.

25 Q Now, referring your attention to  
26 the Cal Advocates Exhibit 13 which is an  
27 excerpt from the all-party motion.  
28 Ms. Fisher read off a portion of the language

1     regarding full-time residents paying more for  
2     the fixed charges in the event of the ratio  
3     between fixed charges and volumetric charges  
4     would be adjusted. Is that correct?

5             A     Yes, that is correct, Mr. Sung.

6             Q     And you had mentioned that when  
7     viewed in isolation, that principle that  
8     Ms. Fisher had stated would be accurate. But  
9     I'm wondering what are the impacts of seeing  
10    just this factor in isolation in a vacuum?  
11    What would be the issue or the problem of  
12    viewing just this one component of the rate  
13    design piece in isolation that Ms. Fisher had  
14    referenced?

15            A     So I think there are a couple of --  
16    there are a couple of concerns when you think  
17    about fixed charges. I think fixed charges  
18    have the affect of trying to -- trying to  
19    draw to some equitable cost recovery as  
20    you're trying to manage the equity between  
21    low-usage customers and high-usage customers.  
22    And I specifically note your low usage versus  
23    high usage as opposed to part-time residences  
24    and full-time residences because you could  
25    also have full-time customers as well low-use  
26    customers. And in setting those fixed  
27    charges you want to be cognizance of the  
28    impact of higher fixed charges on those

1 customers. ]

2 In addition to that, I think when  
3 you're -- when you're trying to look at  
4 the -- the blend between fixed charges, the  
5 conservation signal that we are trying to  
6 promote through rate design, and then the  
7 efficacy of -- of both allocation as well as  
8 how you design rates for that -- the -- the  
9 spread or the continuum of customers, it is  
10 the fixed charges in concert with the season  
11 rates in concert with what you set your tiers  
12 at. It is -- it is all of those three  
13 parameters that then decide whether you --  
14 your designs are equitable or not. So I  
15 think the concern that I would caution or --  
16 or request that we be prudent on this, just  
17 leaning on one particular component in  
18 isolation as you're viewing fixed charges,  
19 and then drawing conclusion on that, would --  
20 would probably be inappropriate

21 Q Thank you, Mr. Behlihomji.

22 No further questions.

23 ALJ TOY: Ms. Fisher, do you have any  
24 recross?

25 MS. FISHER: Yes, your Honor, just a  
26 few questions.

27 ALJ TOY: Continue, when ready.

28

RECROSS-EXAMINATION

BY MS. FISHER:

Q Mr. Behlihomji, isn't it true that -- given Cal Advocates' recommended revenue requirements, wouldn't the increase to all customers, taking into consideration Cal Advocates' rate design, still be less of a percentage increase than what SCE has proposed at the time rates are fully implemented?

A I think the key -- the key to that particular determination, Ms. Fisher, is that starting point of what Cal Advocates' revenue requirement is, and I think when you -- when you're looking at rate design, you should be careful to not put the cart before the horse, and I think, from my perspective, you're looking at how do revenue requirements baked into the -- the design of your rates actually get you to prudent cost recovery? I think noting that, given a substantially or materially lower revenue requirement from where we are today, and then viewing that in concert with the designs that Cal Advocates proposed, I would -- I would lend some caution to viewing it in that manner.

Q Okay. But, it was essentially a -- a yes or no question, is it -- whether Cal

1 Advocates' recommended revenue requirements  
2 wouldn't -- given those requirements,  
3 wouldn't the increase to all customers,  
4 taking into -- Cal Advocates' rate design,  
5 still be less of a percentage increase than  
6 what SCE has proposed at the time that rates  
7 are fully implemented. Would you say yes or  
8 no to that?

9 A Yes, because Cal Advocates' revenue  
10 requirement is a lot lower, yes.

11 Q Thank you.

12 No other questions.

13 ALJ TOY: Mr. Behlihomji, this is the  
14 ALJ.

15 Just building sort of off that  
16 discussion, if, say, the fixed rates were  
17 adjusted to Cal Advocates' ratios of, I  
18 believe, 50 percent fixed, 50 percent  
19 volumetric, how would you expect Edison to  
20 design the -- "A," the volumetric rates, "B,"  
21 the seasonal rates, and I guess "C," the  
22 tiers? How would those adjust in response?

23 THE WITNESS: I'm just going to note  
24 them down in sequence, your Honor, if you  
25 don't mind.

26 ALJ TOY: Sure; no problem.

27 THE WITNESS: You said "A" was the  
28 volumetric rates.

1           ALJ TOY: "B," the seasonal changes,  
2           and then "C," the tiers.

3           THE WITNESS: Tiers.

4           ALJ TOY: If -- if at all.

5           THE WITNESS: So I think with the --  
6           with the increase in fixed charges, your  
7           Honor, you would see a reduction in the  
8           amount or the volume of -- of revenue that  
9           would be recovered through volumetric rates,  
10          and because you're going to a materially  
11          higher level of fixed charges, you would have  
12          to necessarily dilute some of the seasonal  
13          differences, if -- if -- if that is  
14          warranted, and then from a tier standpoint,  
15          it becomes -- it becomes a -- a situation of  
16          your -- your being in a conundrum, because  
17          you've now -- you now have very high fixed  
18          charges, and so you're left with limited  
19          revenue that you can then recover in the  
20          seasonal tier ratios, and -- I mean in the --  
21          sorry, in the -- in the tier ratios and the  
22          tier rates themselves. And so you -- you  
23          would tend to -- a higher fixed charges would  
24          tend to spike up the rate itself, but flatten  
25          the overall composite rate, because what you  
26          would then essentially be left with is a high  
27          fixed charge, and just a flat -- like a  
28          flatter tier structure, from an effected --

1 effectual standpoint; so your price will be  
2 high, but when you weigh against the volume  
3 in each of those tiers, you get a flatter  
4 rate.

5 ALJ TOY: Okay. Thank you.

6 Mr. Bishton, are you ready to  
7 conduct your cross?

8 MR. BISHTON: Yes, I am, your Honor.

9 ALJ TOY: Actually, why don't we take a  
10 five-minute break first?

11 MR. BISHTON: Thank you.

12 ALJ TOY: So we'll come back at 9:56.

13 Off the record.

14 (Off the record.)

15 ALJ TOY: We'll go back on the record.

16 We will now have the  
17 cross-examination of Mr. Behlihomji by the  
18 Catalina parties.

19 Mr. Bishton, please proceed when  
20 you're ready.

21 CROSS-EXAMINATION

22 BY MR. BISHTON:

23 Q Mr. Behlihomji, my name is Norris  
24 Bishton. I represent the Catalina parties,  
25 which is made up of both residential and  
26 un-residential customers of Edison.

27 I direct your attention to the  
28 exhibit you looked at with --

1           ALJ TOY: Mr. -- Mr. Bishton, could you  
2 please speak a little bit louder?

3 BY MR. BISHTON:

4           Q I direct your attention to Exhibit  
5 Cal X -- Cal Advocates-X-13, which is on the  
6 screen in front of you, particularly to page  
7 A-4 and to the full language there, the Joint  
8 Parties recognized the goals of equitable  
9 cost recovery and conservation could be  
10 achieved by adjusting, one, the amount of  
11 revenue recovered through fixed charges as  
12 opposed to volumetric charges, two, the  
13 allocation of volumetric revenue recovered  
14 from the residential and non-residential  
15 classes, and three, the differential between  
16 the summer and winter volumetric rates. By  
17 adjusting these parameters, the Joint Parties  
18 ensure the overall revenue allocation is  
19 representative of the usage distribution  
20 across the rate classes, where 49 percent of  
21 the water is used by the residential class,  
22 and the remaining 51 percent used by the  
23 non-residential class. The overall revenue  
24 allocation in the settlement is in --  
25 49 percent of the revenue is recovered from  
26 the residential class, with the balance  
27 recovered from the non-residential classes.

28           In the rate design that you're



1 presenting in the current GRC, did you follow  
2 all of those principles, or any of them?

3 A So we -- we followed the principles  
4 as listed over year, adjusted for the -- you  
5 know, in Resolution 5192, we also adjusted  
6 the residential versus non-residential  
7 revenue allocation. So we -- we baked that  
8 into the consideration of the design for  
9 rates in this proceeding, as well.

10 Q Does it come out to 51 percent for  
11 the non-residential classes, and 49 percent  
12 for the revenue -- for the residential  
13 classes?

14 A It's at -- it's at a 60/40 split  
15 right now between residential and  
16 non-residential, with 40 residential, and 60  
17 non-residential.

18 Q So you shifted a greater amount for  
19 the -- the design shifts a greater burden on  
20 non-residential, as compared to present  
21 rates?

22 A I think the -- the revenue -- the  
23 revenue allocation process as agreed to in  
24 principle in this particular settlement, and  
25 then flowing through how usage distribution  
26 has changed between the residential and the  
27 non-residential classes, resulted in the  
28 60/40 split. I -- the rate design doesn't do

1     that.  The rate design just looks at in --  
2     intraclass equity.  But, in terms of  
3     interclass equity, it's the process of  
4     revenue allocation and the usage distribution  
5     that decides the proportion of cost recovery  
6     between the classes.

7           Q     When you look at the residential  
8     users in Catalina Island, there are some that  
9     are full-time year-round residential users,  
10    and they're some that are only part-time  
11    residential users.  Is that correct?

12          A     That is my understanding, yes.

13          Q     As -- as -- have you attempt --  
14    tried to quantify and differentiate between  
15    the full-time residents and part-time  
16    residents?

17          A     If I understand your question, are  
18    you -- are you asking me have we -- have we  
19    uniquely identified full-time versus  
20    part-time residents?  Is that your question,  
21    sir?

22          Q     Yes.

23          A     So, no, not -- not for the purposes  
24    of our rate design.  When -- when we do our  
25    rate design, we -- we look at the entirety of  
26    the class, as a whole, and then, based on the  
27    usage distribution in the class, determine  
28    the appropriate methods and processes to

1 arrive at a rate design for the classes.

2 Q If someone is a part-time user,  
3 say, uses their residence only in the summer  
4 months, six or five months of the year, they  
5 pay the fixed charges in the remaining seven  
6 months. Is that correct?

7 A Did I -- I didn't quite hear you,  
8 sir. Can you repeat that?

9 Q A residential customer who owns  
10 property on Catalina Island, owns a  
11 residence, and uses it in the summer months,  
12 approximately five months, and doesn't use it  
13 at all in the seven months, that seven months  
14 period of time they pay only the fixed  
15 charge?

16 A That is correct, yes.

17 Q By increasing the fixed charge,  
18 that would increase what is paid by the --  
19 such a person, such a user, for  
20 non-residential months that they are not  
21 using any water, and contributing to covering  
22 the cost, but on the other hand, they are  
23 paying to have the water available to them  
24 when they come?

25 A Yeah, but that -- we also have  
26 seasonal rates for that purpose, Mr. Bishton,  
27 and so the -- the -- the difference in the  
28 seasonal rates, complemented by how we set

1 the tiers, effectuates and -- the purpose.  
2 And in my discussion with Ms. Fisher, it's --  
3 I like to always have conversations on rate  
4 design by looking at this -- this -- what I  
5 call the portfolio of parameters, because  
6 when we start to view things in isolation or  
7 in one piece or segment, I think we miss the  
8 picture of the broader picture of what rate  
9 design is trying to achieve. And so in this  
10 particular case, yes, they'll be there in the  
11 summer, but then they're also paying higher  
12 volumetric rates, and then, you know,  
13 depending on where they flow, of where they  
14 fall in the continuum of usage, they could  
15 be, you know, Tier 2, Tier 3 customers. I  
16 think it's -- it's this blend of all of these  
17 principles that makes rate design work.

18 Q Directing your attention to SCE-07,  
19 page 26, which I put up on the screen --

20 A Okay.

21 Q -- in your -- this picture  
22 referenced, and you testified that there is a  
23 Commission-adopted baseline, and it's  
24 referenced in the top sentence there,  
25 D.20-07-032, the Commission adopted a  
26 baseline quantity for water service at  
27 600 cubic feet, 4,488 gallons, per month.  
28 This equates to approximately 50 gallons per

1 person per day for a three-person household.

2 A Can you -- can you guide me to  
3 the -- the specific page number of this?

4 Sorry, Mr. Bishton. I'm --

5 Q It's page 26, and under Essential  
6 Water Services on Catalina Island --

7 A SCE-07. Right?

8 Q Yes.

9 A Can we -- can I ask a question?

10 Paul, this question is directed at  
11 you. This -- I think page 26 is referenced  
12 under the affordability of proposed rates.

13 Q Page 26 at the bottom, I'm looking  
14 at --

15 A I'm happy to -- I'm happy to go  
16 through the questions, but I just wanted to  
17 confirm process.

18 Q I -- I'm asking you whether that --  
19 first of all, can you read what I just read?  
20 Is that available to you?

21 A Yeah. Yes, I did, Mr. Bishton.

22 Q And what -- the baseline set by the  
23 Commission is for a -- a residential  
24 household of three people. That's how they  
25 arrived at a typical baseline number,  
26 50 gallons per person, approximately 5,000  
27 gallons or 4,500 gallons a month.

28 A Okay.

1 Q And --

2 ALJ TOY: Mr. Bishton -- sorry. This  
3 is the ALJ cutting in. This is not  
4 Mr. Behlihomji's testimony, which is what  
5 he's pointing out. You can certainly ask him  
6 the question regarding what's listed, but  
7 he's not the person that wrote this, that is  
8 representing it.

9 MR. BISHTON: I agree.

10 ALJ TOY: Keep -- keep that in mind  
11 when you ask your question.

12 MR. BISHTON: He -- he testified as to  
13 this particular provision during Ms. Fisher's  
14 cross-examination.

15 THE WITNESS: So I was -- I was  
16 referring to -- Mr. Bishton, I was referring  
17 to the discussion in -- going back to the  
18 page number where we talk about this. Give  
19 me a second.

20 So it was on page 8, I believe. On  
21 page 8, line 2, we -- we reference  
22 D.20-07-032, and that's -- that's what I was  
23 trying to draw Ms. Fisher's attention to when  
24 she was asking me about the specific  
25 Commission decision.

26 BY MR. BISHTON:

27 Q Going further down on this page, it  
28 says: For example, in 2019, Catalina Water

1 residential single-family accounts consumed  
2 only 1,466 gallons per month, on average, or  
3 one-third of the baseline quantity adopted in  
4 the D.20-07-032.

5 My question is -- is: Did you use  
6 that number, 1,466, in coming up with a  
7 baseline residential usage in -- in the rate  
8 design?

9 A So now, for the purposes of rate  
10 design, Mr. Bishton, we kept the -- the tier  
11 levels pretty much consistent with what we  
12 had as an outcome of the settlement  
13 discussions. So, you know, as we described  
14 the tier levels for Tier 1, Tier 2 and Tier  
15 3, we kept those levels pretty much the same.  
16 Actually, I shouldn't say, "pretty much," but  
17 we kept them the same in this particular  
18 application. The determination of the one  
19 four -- I can't -- I can't speak to the --  
20 the -- the specific purpose of what this  
21 section of testimony is -- is -- is driving  
22 at with that determination, but I'll tell you  
23 that for setting Tier 1, or the baseline  
24 level of usage, we generally try to  
25 accommodate a perspective that set the volume  
26 of usage for Tier 1 in the 55 to 60 percent  
27 range, the 55 to 60 percent range meaning the  
28 55 to 60 percent range of total residential

1 customers -- I mean consumption. So what  
2 we're saying is, if you had total residential  
3 consumption at a hundred gallons, then 55 to  
4 60 seems to be, in -- in my opinion, a proven  
5 way of designing Tier 1 rates, or a  
6 prudent -- prudent volume of -- of recovery  
7 for Tier 1 rates.

8 Q How many gallons per month would  
9 that be for a residential user?

10 A And so we -- we describe that on  
11 page 8 at -- at 2000 gallons for Tier 1.

12 Q 1,466 is only probably 22 gallons  
13 for a three-person household, 2000 is like 25  
14 or 26.

15 Is it your testimony that the  
16 average full-time resident household of three  
17 would use 26 -- only 26 gallons a month per  
18 resident per day, the per day usage?

19 A Can you repeat that --

20 (Crosstalk.)

21 THE WITNESS: Sorry. Go on.

22 ALJ TOY: Based on what assumptions is  
23 that? How many --

24 THE WITNESS: Yeah.

25 (Crosstalk.)

26 ALJ TOY: How many --

27 THE WITNESS: Can you repeat the --  
28 the -- the calculations --



1 MR. BISHTON: I'll -- let me --  
2 (Crosstalk.)

3 BY MR. BISHTON:

4 Q If you use 2000 gallons per  
5 month --

6 A Uh-huh.

7 Q -- as an estimate, is that for a  
8 household of three?

9 A So we -- we determine that,  
10 Mr. Bishton, looking at the volume of total  
11 residential rates. So like we're --  
12 we're not going down to years what our  
13 assumptions are on a three-person household  
14 versus a four-person household.

15 So broadly speaking, when we do  
16 our -- when we do baseline analysis, and this  
17 is what I was describing earlier, we do a  
18 cumulative distribution function, and based  
19 on the cumulative distribution function of  
20 total residential use, we then determine an  
21 appropriate level of how much volume in that  
22 cumulative distribution function falls in  
23 Tier 1; and the appropriateness measure that  
24 we described before is this 55 to 60 percent  
25 range, and when we do the math, it then  
26 arrives at 2000 gallons a month.

27 Q But, the math is by looking at the  
28 average consumption of all users, including

1 full-time users, residential --

2 A All of --

3 Q -- users, and part-time --

4 A All residential --

5 Q -- users?

6 A All residential consumption is used  
7 in that -- in that function, yes.

8 MR. BISHTON: I have no further  
9 questions.

10 ALJ TOY: Does SCE have any redirect?

11 MR. SUNG: Yes, your Honor.

12 ALJ TOY: Proceed, when ready.

13 REDIRECT EXAMINATION

14 BY MR. SUNG:

15 Q Mr. Behlihomji, you testified that  
16 SCE doesn't adopt a three-person or four  
17 part -- four-person household level of  
18 granularity, and that, instead, SCE adopts a  
19 55 to 60 percent range of total residential  
20 customer volume. Could you just elaborate  
21 that one further time, for -- for the benefit  
22 of the Commission, as to that methodology,  
23 and why that is preferable, and why that  
24 makes sense as to, you know, SCE's proposal?

25 A And -- and, Mr. Sung, it's  
26 generally what we do, even on the electric  
27 side, like when you're -- when you're  
28 establishing, because we recognize that --

1     you know, when you think about the principles  
2     of rate design, you're thinking about  
3     affordability, as a -- as a hallmark concern,  
4     you're thinking about equitable cost  
5     recovery, and you're thinking about the  
6     process of which you manage the -- the  
7     allocation between the classes. Tiers  
8     becomes an important discussion when you are  
9     thinking about how do you want to spread  
10    equity within a class? And I call -- I  
11    just -- I normally describe that as  
12    intraclass equity. Right? And in the  
13    determination of intraclass equity, when  
14    we -- when we design these tiers, we derive a  
15    cumulative distribution function, because a  
16    cumulative distribute -- distribution  
17    function that includes all customers,  
18    part-time or full-time, be it the  
19    determination of three people in the  
20    household or four people in a household, in  
21    effect, considers and includes all of the  
22    idiosyncrasies of your class, and as it  
23    includes all of these different parameters  
24    that are now baked into your class, it gives  
25    you this -- this holistic view of what this  
26    usage function looks like to then say where  
27    is the steepness of the curve, how is the  
28    curve -- is -- you know, effectuating itself

1 as you're going from the lowest usage into  
2 the highest usage, and then establishing a  
3 threshold based on that, in my opinion, is a  
4 more robust way, because you're -- you're --  
5 you're setting your tiers given all factors.  
6 Right? You're saying, given all factors that  
7 are currently baked into my population, what  
8 is the best way this function describes  
9 usage, and how and where do I want to set  
10 that tier level?

11 Q In having done that type of  
12 analysis, is it your testimony that SCE's  
13 proposal takes that into account and -- when  
14 setting the tier break points?

15 A Yes, it does. And in -- in  
16 addition to the fact that we -- you know, we  
17 recognize that Catalina is unique, because  
18 we -- we know that Catalina -- that a large  
19 volume of sanitation -- I mean a large volume  
20 of water use is saltwater sanitation use.  
21 And so, given all of the parameters that we  
22 know that are baked into the usage profile  
23 that are unique to Catalina, it is my  
24 opinion, then, the 2000 gallons is  
25 appropriate.

26 MR. SUNG: Thank you. No further  
27 questions.

28 ALJ TOY: Mr. Bishton, do you have any

1 additional cross-examination?

2 MR. BISHTON: No further questions.

3 ALJ TOY: Thank you.

4 Just one question, Mr. Behlihomji.  
5 In SCE-7, on page 21, you talk a little bit  
6 about the CARE program, and then you note, on  
7 line 9, that SCE's proposing to raise the  
8 discount from 20 to 32 and a half percent.

9 THE WITNESS: That is correct, your  
10 Honor.

11 ALJ TOY: What sort of discussion or  
12 analysis went into raising it to 32 and a  
13 half percent, or making the change?

14 THE WITNESS: I think we recognize  
15 two -- two parameters that we considered. We  
16 recognize that we're -- we're going in with a  
17 material increase in -- in our request for  
18 revenue requirement, and then the second  
19 aspect of the -- the consideration was  
20 aligning it with what we have on the electric  
21 side. So on the electric side, the effective  
22 CARE discount rests at 32.5 percent, given  
23 the revenue requirement increase, and in  
24 order to maintain that alignment, we felt  
25 bringing Catalina customers' CARE discount up  
26 to measure at 32.5 would also make sense.

27 ALJ TOY: Okay. So it wasn't based on  
28 any sort of analysis such that perhaps the

1 discount were to keep rates for CARE  
2 customers around the same rates that they are  
3 now?

4 THE WITNESS: In -- in effect, I think  
5 you -- you would have to -- so, your -- your  
6 Honor, I'm conceptually thinking out loud, so  
7 please note that.

8 But, I think, given to -- to make  
9 that consideration, you would have to  
10 backwards solve for how much of an increase  
11 coupled with -- I mean how much of an  
12 increase in revenue requirements coupled with  
13 how much of movement on the CARE discount  
14 would land you at -- at the same effective  
15 average rate. But, you could do the analysis  
16 that was -- we -- we didn't go down that  
17 specific path. It was more of we have a  
18 sizable increase, we want to align with  
19 the -- the electric side, and let's land on  
20 the 32.5 percent discount.

21 ALJ TOY: Okay. Thank you. Seeing --  
22 I have no further questions.

23 So Mr. Behlihomji, you are dismissed  
24 today.

25 THE WITNESS: Thank you, your Honor.

26 ALJ TOY: Thank you.

27 THE WITNESS: Thank you, Mr. Sung.

28 ALJ TOY: Off the record.

1 (Off the record.)

2 ALJ TOY: Back on the record.

3 We will now proceed with the  
4 testimony of Mr. Fox.

5 Mr. Fox, please state your full name  
6 and place of business, for the record.

7 MR. FOX: David Fox, D-a-v-i-d F-o-x,  
8 Raftelis, 24 Superior Drive, Natick,  
9 Massachusetts 01545.

10 ALJ TOY: And is your testimony on  
11 behalf of Southern California Edison?

12 MR. FOX: Yes, it is.

13 ALJ TOY: Thank you. Could you please  
14 read the witness attestation?

15 MR. FOX: Yes.

16 I, David Fox, do solemnly state  
17 under penalty of perjury that the testimony I  
18 give in this case now pending before this  
19 commission shall be the truth, the whole  
20 truth, and nothing but the truth.

21 I, David Fox, attest I will testify  
22 based on my own knowledge and memory, free  
23 from external influences or pressures.

24 I, David Fox, attest I will adhere  
25 to all formal requirements of testifying  
26 under oath, including the prohibition against  
27 being coached.

28 I, David Fox, attest I will only

1 refer to and -- materials provided by the  
2 parties, exhibits premarked and identified by  
3 the parties, and previously shared with the  
4 opposing party.

5 I, David Fox, attest I will not make  
6 any recordings of the proceeding. I attest I  
7 understand that any recording of the  
8 proceeding held by Webex, including  
9 screenshots or other visual copying of a  
10 hearing, is absolutely prohibited.

11 I, David Fox, attest that I  
12 understand a violation of these prohibitions  
13 may result in sanctions, including removal  
14 from the evidentiary hearings, restricted  
15 entry to future evident -- future hearings,  
16 denial of entry to future hearings, or any  
17 other sanctions deemed necessary by the  
18 Commission. ]

19 I, David Fox, attest I will not  
20 engage in any private communications by  
21 phone, text, or e-mail, or any other mode of  
22 communication, while under oath and being  
23 examined;

24 If I, David Fox, experience any  
25 attempts to tamper with my witness testimony,  
26 I will report the occurrence to the Presiding  
27 Officer immediately.

28 ALJ TOY: Thank you.



1 Ms. Fisher -- excuse me.

2 SCE, your witness.

3 MR. SUNG: Thank you, your Honor.

4 DAVID FOX, called as a witness by  
5 Southern California Edison Company,  
6 having been sworn, testified as  
7 follows:

8 DIRECT EXAMINATION

9 BY MR. SUNG:

10 Q Mr. Fox, are you sponsoring written  
11 testimony today in this proceeding?

12 A Yes.

13 Q Is it correct that you are  
14 sponsoring Appendix B, Raftelis Memorandum on  
15 Alternative Funding Mechanisms of SCE's  
16 Supplemental Testimony, labeled SCE-09, as  
17 identified in the Table of Contents?

18 A Yes.

19 Q Was this material prepared by you  
20 or under your direction?

21 A Yes.

22 Q Do you have any corrections that  
23 you would like to make to your testimony at  
24 this time?

25 A No.

26 Q To the extent your testimony is  
27 factual, do you believe it to be true and  
28 correct?

A Yes.

1           Q    To the extent your testimony  
2 reflects an opinion or judgment, does it  
3 reflect your best professional opinion or  
4 judgment?

5           A    Yes.

6           MR. SUNG: Your Honor, this witness is  
7 available for cross-examination.

8           ALJ TOY: Thank you.

9           Ms. Fisher, on behalf of Public  
10 Advocates, please start your cross when  
11 you're ready.

12          MS. FISHER: Thank you, your Honor.

13                   CROSS-EXAMINATION

14          BY MS. FISHER:

15           Q    Emily Fisher, with Public  
16 Advocates. And it's still morning -- good  
17 morning, Mr. Fox.

18                   So your firm, Raftelis, is an  
19 independent, third-party consultant that SCE  
20 employed to evaluate the cost-recovery  
21 options; is that correct?

22          A    That is correct. Yes.

23           Q    And Raftelis performed a study  
24 along those lines to evaluate potential  
25 alternative funding or cost-recovery  
26 mechanisms for the Catalina Water Utility; is  
27 that correct?

28          A    Yes.

1           Q    Could you please turn to page B-2  
2   of Exhibit SCE-09, Appendix B.

3           A    Sure. Give me just one second.  
4                Okay.

5           Q    And this page lists the various  
6   funding strategies that Raftelis evaluated;  
7   is that correct?

8           A    Yes. It leads onto B-3, as well;  
9   but, yes.

10          Q    Okay. And one of the strategies  
11   listed is SCE's proposed strategy of  
12   ratemaking consolidation with electric  
13   customers; is that right?

14          A    Yes.

15          Q    Is it your understanding that  
16   ratemaking consolidation, or a cross subsidy,  
17   is SCE's preferred strategy?

18          A    Yes.

19          Q    And in your opinion, having  
20   conducted the study and prepared this memo,  
21   is rate consolidation the best option?

22          A    Yes.

23          Q    Near the bottom of that same page,  
24   B-2, you state that:

25                Edison electric customers compose  
26                an estimated 70 percent of  
27                visitors to Catalina.

28                Is that correct?

1           A     That is correct.

2           Q     In your opinion, is that an  
3 accurate statement?

4           A     It is the most accurate assessment  
5 that I've seen. If I were to get a little  
6 bit deeper, I would say that it's probably  
7 not exactly 70 percent. I don't think  
8 anybody can prove that. But I think on the  
9 spectrum of 0 to 100 percent, within that, 70  
10 is closer to 100 than 0.

11          Q     Okay. Please turn to page B-8 of  
12 Exhibit SCE-09 of Appendix B.

13          A     Okay.

14          Q     And in the paragraph under the  
15 heading "Ratemaking Consolidation," you state  
16 that:

17                     In the case of rate consolidated  
18                     Class A utilities, there is no  
19                     nexus between the service  
20                     populations, other than that  
21                     corporate entity that owns them.

22                     Is that correct?

23          A     That is correct.

24          Q     Wouldn't you agree that in Class A  
25 water utilities, the utility is providing  
26 water service to all of its service  
27 populations?

28          A     Yes, I would.

1           Q    So, would you agree that all of the  
2   Class A's utility customers are being billed  
3   for water service that they actually receive?

4           A    Yes, I would.  But I would caveat  
5   that, though, if there are two separate  
6   service areas completely distinct and  
7   separate.  Those two separate areas, the  
8   customers within them, are receiving very  
9   different services potentially.

10          Q    And further down in the same  
11   paragraph, you state that:

12                   SCE Water has argued that Edison's  
13                   electric customers compose  
14                   approximately 70 percent of the  
15                   visitors to Catalina, as we  
16                   discussed --

17          A    Yes.

18          Q    Did the Raftelis study evaluate  
19   that argument or attempt to verify it?

20          A    Only through the verification of  
21   where that 70 percent came from -- and I  
22   don't have the title of the report in front  
23   of me -- but I think it was a 2017 or 2018,  
24   which basically stated that 70 percent of the  
25   annual visitors to Catalina Island come from  
26   Southern California.

27          Q    So is it accurate to say that the  
28   study did not independently evaluate any of

1 SCE's claims about visitors to Catalina being  
2 Edison electric customers?

3 A Other than verifying the 70 percent  
4 from its source document, that is correct.

5 Q And the source document you're  
6 referring to, I believe, is cited in SCE's  
7 testimony elsewhere?

8 A I believe that it is. I believe  
9 it's the economic impact of -- I can look it  
10 up and tell you exactly what it is, if that  
11 would be helpful?

12 Q So Raftelis is an independent,  
13 third-party consultant. But where the cross  
14 subsidy or rate consolidation option was  
15 concerned, would it be fair to say that you  
16 took SCE's word for it?

17 A Word for what, Ms. Fisher?

18 Q For the -- for the 70 percent  
19 figure -- excuse me -- of electric customers  
20 visiting the island? Excuse me.

21 A No. I don't think it's fair to say  
22 that we took SCE's word for it in -- in a  
23 bubble, by confirming where the 70-percent  
24 number came from. And, again, I recognize  
25 that it's not exactly 70 percent of visitors  
26 to Catalina Island are all SCE electric  
27 customers. But I think it's the most  
28 reasonable approximation that we've been able

1 to find.

2 Q But apart from -- apart from the  
3 document referenced in SCE's testimony,  
4 Raftelis did not do any additional research;  
5 is that correct?

6 A That is correct.

7 Q Thank you.

8 No -- no more questions.

9 ALJ TOY: Does SCE have any redirect?

10 MR. SUNG: Yes, your Honor.

11 ALJ TOY: Continue when ready.

12 REDIRECT EXAMINATION

13 BY MR. SUNG:

14 Q Mr. Fox, Ms. Fisher had mentioned  
15 that for certain Class A utilities, other  
16 than corporate ownership, the services being  
17 provided are very dissimilar, as you put it;  
18 correct?

19 A That is correct.

20 (Court reporter clarification.)

21 THE WITNESS: Yes. That is correct.  
22 The cost of the services being provided to  
23 very disconnected and dissimilar service  
24 areas could be vastly different as well.

25 BY MR. SUNG:

26 Q And why -- why is it your  
27 contention that SCE's proposed class subsidy  
28 represents a stronger nexus than corporate

1 ownership of two disconnected or dissimilar  
2 service areas of a Class A water utility?

3 A Sure. So we know that at least  
4 some of the visitors to Catalina Island on an  
5 annual basis are SCE electric customers.  
6 It's probably not the fully 70 percent, as I  
7 just attested to, with my responses to Ms.  
8 Fisher. But it is not zero; it's something  
9 above that. And then there's at least a  
10 nexus there between visitors coming to the  
11 island, who are SCE electric customers, who  
12 are placing a demand on the water system by  
13 visiting the island.

14 I would argue that with a Class A  
15 utility, which has two very disconnected and  
16 dissimilar service areas and different  
17 geographical regions, that are -- one is more  
18 expensive to operate; and one is less  
19 expensive to operate; and there's cost  
20 sharing amongst the two -- there's almost no  
21 nexus whatsoever between the cost sharing  
22 there.

23 Q Thank you.

24 And directing your attention to  
25 the -- Raftelis itself. SCE hired Raftelis  
26 to conduct an independent survey of the class  
27 recovery options; is that correct?

28 A That is correct.



1           Q   And could you provide us, and the  
2 Commission, more detail on the kind of  
3 expertise that Raftelis has with water  
4 utilities in California or across the nation?

5           A   Sure. Raftelis has been in  
6 business for about 28 or 29 years now. Our  
7 predominant focus is on the rate, pricing,  
8 and financial management consulting services  
9 for the water industry. Within California,  
10 we have offices in Murrieta, L.A., and we  
11 also have staff in Santa Barbara. We've  
12 provided rate financial services to over 100  
13 different agencies within California.

14               We also have a nationwide practice  
15 and presence as well. Within the last year  
16 alone, we've conducted over a thousand  
17 different studies for 600 agencies in, I  
18 think, 46 different states.

19               My experience: I've been doing  
20 this for over a decade in rate and cost  
21 recovery for water utilities. I've done work  
22 for utilities with less than 50 customers,  
23 all the way up to about a million, and  
24 everything in between.

25           Q   So given your extensive experience  
26 and expertise in this area, is it your  
27 contention that SCE's proposed cost  
28 subsidization is the most reasonable means of

1 cost recovery at Catalina Island today?

2 A Yes, I do. I know it's a unique  
3 situation, and a unique response and  
4 solution; but Catalina Island's water utility  
5 is very unique in and of itself. I've done  
6 over probably a hundred different rate  
7 studies or financial studies for water  
8 utilities across my career, and I've never --  
9 and many of those actually visited their  
10 operations -- and I've never seen an  
11 operation like Catalina Water's.

12 I've visited the island. I was  
13 given a tour of all the operations. The  
14 infrastructure, it's very unique in its own  
15 right. And I would be hard pressed to find  
16 another example like it.

17 Q Thank you.

18 No further questions.

19 ALJ TOY: Ms. Fisher, do you have any  
20 recross?

21 MS. FISHER: Yes, your Honor.

22 ALJ TOY: Continue when ready.

23 RECROSS-EXAMINATION

24 BY MS. FISHER:

25 Q Mr. Fox, you mentioned that the  
26 services provided by a Class A water utility  
27 to different areas can be completely  
28 dissimilar; is that correct?

1           A     Yes.

2           Q     But wouldn't those service areas  
3 both be subject to the same Water Division  
4 standard practices?

5           A     What do you mean by that,  
6 Ms. Fisher?

7           Q     As far as regulation by the  
8 Commission, wouldn't both service areas be  
9 subject to the same standard practices?

10          A     Yes.

11          Q     And wouldn't the service areas be  
12 also subject to the same statewide water  
13 quality standards?

14          A     Yes.

15          Q     And wouldn't they also be subject  
16 to the same federal EPA water quality  
17 standards?

18          A     Yes.

19          Q     And wouldn't they also be subject  
20 to the same costs associated with the  
21 complying with the CPUC's general orders  
22 pertaining to water quality service?

23          A     I don't know.

24          Q     But you still contend that water  
25 services provided by a Class A water utility  
26 to different service areas are significantly  
27 dissimilar?

28          A     Not necessarily. They don't have

1 to be significantly dissimilar, but they can  
2 be. They can have very different cost  
3 structures in their operations and cost  
4 levels at their different operations. One  
5 can be a very, you know, low-cost operation  
6 by -- could be a proxy of more customers to  
7 spread those costs over. Another service  
8 area could be a high-cost area just by proxy  
9 of not having very many customers to spread  
10 those costs over. So in that sense, I would  
11 say they are very dissimilar in types of  
12 their cost structure to provide service to  
13 those two different service areas.

14 Q Yet they -- they have all the  
15 similarities that you previously agreed  
16 exist?

17 A Yes. But that does not mean they  
18 have the same similar costs associated with  
19 running the two systems.

20 Q Would --

21 THE REPORTER: Mr. Fox, this is the  
22 reporter. Sorry for the interruption. I'm  
23 just going to ask if you could just slow down  
24 just a tiny bit for me, please?

25 Thank you.

26 THE WITNESS: Sorry. Too much coffee  
27 this morning.

28 MS. FISHER: Lucky.

1 THE WITNESS: Actually, it's 1:30 here.  
2 So this afternoon --

3 BY MS. FISHER:

4 Q Okay. Fair enough.  
5 Would you agree though --  
6 (Crosstalk.)

7 THE WITNESS: I'm sorry. Could you  
8 please repeat the question, if there was a  
9 question before?

10 BY MS. FISHER:

11 Q Sure. I'm about to pose it.  
12 Would you agree though that no  
13 matter how -- in what ways two water service  
14 areas may be dissimilar, there is still more  
15 similarity between water services than  
16 between water and electric service?

17 A With regard to the service  
18 provided?

19 Q Right.

20 A Yes.

21 Q Thank you.

22 No more questions.

23 ALJ TOY: Does SCE have any redirect?

24 MR. SUNG: No, your Honor.

25 ALJ TOY: Thank you, Ms. Fisher.

26 Off the record.

27 (Off the record.)

28 ALJ TOY: Back on the record.

1                   We will now proceed with the cross  
2 of Mr. Fox by TURN.

3                   MR. FINKELSTEIN: Thank you, your  
4 Honor.

5                   CROSS-EXAMINATION

6 BY MR. FINKELSTEIN:

7                   Q Good -- I guess, good morning and  
8 afternoon, Mr. Fox. I'm Bob Finkelstein,  
9 representing TURN in this matter.

10                  A Morning.

11                  Q Let me start by following up with  
12 something I heard in your response to a  
13 question from Ms. Fisher --

14                  A Mm-hm.

15                  Q -- with regard to the  
16 70-percent-of-Catalina-visitors-being-Edison-  
17 customers figure that you discussed with her,  
18 I thought I heard you say that you're aware  
19 that the 70-percent figure may not be exactly  
20 accurate; but you think it's closer to a  
21 hundred percent than it is to zero percent.

22                         Did I get that right?

23                  A Yes.

24                  Q So in saying that, is it your  
25 assertion that you're confident that it's  
26 more than 50 percent of the visitors are  
27 people that are served by Edison's electric  
28 utility services?

1           A     That's my best estimate, yes.

2           Q     And for that best estimate, how did  
3     you treat the customers that were listed in  
4     the study that you relied on as being just  
5     generally from Los Angeles?

6           A     Can you ask that question again,  
7     Mr. Finkelstein?

8           Q     Well, let me try it this way, Mr.  
9     Fox:  You're, aware are you not, that Los  
10    Angeles is served both by Southern California  
11    Edison and by the Los Angeles Department of  
12    Water and Power?

13          A     I'm aware of that, yes.

14          Q     Okay.  So for purposes of assessing  
15    the figure that came out of the study that  
16    you relied on, how did you treat those  
17    customers, in terms of making some sort of  
18    determination as to whether or not they ought  
19    to be treated as Edison customers for  
20    electric service, or if they ought to be  
21    treated as LADWP customers for electric  
22    service?

23          A     Thank you.  I understand your  
24    question now.  We did not make a formal  
25    assessment or determination.

26          Q     Okay.  And then, similarly, for  
27    customers -- I mean, the 70-percent figure  
28    was a figure representing customers that are

1 from Southern California; is that correct?

2 A Yes.

3 Q And it included customers from San  
4 Diego?

5 A No.

6 Q Okay. So it was Southern  
7 California exclusive of San Diego, was your  
8 understanding?

9 A Yes.

10 Q Okay. Thank you, Mr. Fox.

11 Your Honor, that's all I have at  
12 this time.

13 ALJ TOY: Does SCE have any redirect?

14 MR. SUNG: No, your Honor. Thank you.

15 ALJ TOY: Okay. I just had a couple  
16 questions, Mr. Fox.

17 EXAMINATION

18 BY ALJ TOY:

19 Q Going back to the list from pages  
20 B-2 to B-3, SCE-09, was that list generated  
21 by Raftelis? Or was it a list generated by  
22 SCE for Raftelis to analyze?

23 A Raftelis generated this list.

24 Q Okay. Thank you.

25 And were these options at all  
26 discussed with the general population of  
27 businesses and residents of Catalina?

28 A Not by Raftelis, no.



1           Q    Thank you.

2                   I have no further questions.  So,  
3   Mr. Fox, you are dismissed.

4           THE WITNESS:  Thank you.

5           ALJ TOY:  Off the record for a second.

6                   (Off the record.)

7           ALJ TOY:  We'll go back on the record.

8                   Off the record, we were discussing  
9   scheduling issues regarding future dates for  
10   evidentiary hearing.  We discussed possibly  
11   moving TURN's testimony up to March 7th.  And  
12   SCE also had a couple issues flagged that  
13   they would like to discuss.

14          MR. SUNG:  Thank you, your Honor.

15                  So because SCE has concluded its  
16   presentation of its witnesses, and as the  
17   cross estimates currently stand, the Catalina  
18   Parties have requested three total hours of  
19   cross-exam time of Cal Advocates's witnesses,  
20   Jeff Roberts and Chris Ronco.  And Cal  
21   Advocates has requested 30 minutes of time  
22   with Catalina Parties' witnesses, Ms.  
23   Rogers -- Ms. Vicki Rogers.

24                  The problem is that, you know, what  
25   we see here, your Honor, is that the only  
26   questions that the Catalina parties and Cal  
27   Advocates would have for each other's  
28   witnesses would constitute improper friendly

1 cross-examination. Because SCE has not  
2 requested any time at all with these  
3 witnesses, there really is no need for these  
4 witnesses to be -- to appear at all. So our  
5 request would be that your Honor would  
6 prohibit the practice of friendly  
7 cross-examination and -- mainly, because  
8 there really is no contested or disputed  
9 areas of factual issues.

10 As your Honor's own January e-mail  
11 ruling makes clear, the identification of  
12 material with disputed factual issues is  
13 required for every witness participating.  
14 Absent the showing of any genuine dispute of  
15 material fact, and absent adversity on the  
16 alignment of these issues, cross-examination  
17 should not be used to clarify previously  
18 submitted testimony exhibits. Discovery  
19 through data requests should have been  
20 undertaken before evidentiary hearings, to  
21 the extent clarification would be wanted.

22 And it seems like Mr. Finkelstein  
23 would be amenable to appearing for  
24 cross-examination on March the 7th. And it  
25 would appear, you know, given where the  
26 schedule is now, that we would not need to  
27 appear on the 14th, which would save the  
28 parties and the Commission time and resources

1 as well. But more importantly, this really  
2 would avoid the improper practice of friendly  
3 cross-examination.

4 And SCE submits that if Cal  
5 Advocates and the Catalina Parties wish to  
6 call each other's respective witnesses, then  
7 the burden would be on them, on those  
8 parties, to show the need for and warrant the  
9 hearings. So I believe it's fair for your  
10 Honor to ask Cal Advocates and the Catalina  
11 Parties to show, now, what factual disputes  
12 or adversity actually exists, with respect to  
13 these witnesses, that would necessitate the  
14 need for their testimony on the stand.

15 ALJ TOY: Does the Public Advocates  
16 Office have a response with regards to Ms.  
17 Rogers and what they plan to ask Ms. Rogers?

18 MS. FISHER: Emily Fisher with Public  
19 Advocates. At this time, having reviewed, we  
20 have -- as I mentioned off the record, we  
21 have decided to waive cross of Ms. Rogers.

22 ALJ TOY: Okay. Thank you.

23 And does the Catalina Parties have a  
24 response with regards to the cross for  
25 Mr. Roberts and Mr. Ronco?

26 MR. BISHTON: First of all, your Honor,  
27 we don't oppose eliminating the testimony by  
28 Vicki Rogers. We can agree to that. There's

1 no problem on that.

2 ALJ TOY: Mister --

3 (Crosstalk.)

4 (Court reporter clarification.)

5 MR. BISHTON: I can't get any closer to  
6 this microphone. I'll try.

7 Catalina Parties would agree to the  
8 suggestion of Catalina -- of Cal Advocates to  
9 eliminate the testimony and the need to  
10 schedule Vicki Rodgers. If they are not  
11 going to cross-examine that witness, then it  
12 should be off the schedule.

13 As to the other witnesses, the  
14 position of Catalina Parties and the position  
15 of Cal Advocates is not necessarily the same.  
16 There's differences between the two groups,  
17 and those can be addressed in  
18 cross-examination. It won't be as long as I  
19 think the time is reserved. My attention is  
20 to deal with differences between the  
21 positions taken by Cal Advocates and the  
22 position taken by Catalina Parties.

23 ALJ TOY: Does SCE have a response?

24 MR. SUNG: Yes, your Honor. Given our  
25 review and study of the intervenor  
26 testimonies and the positions of the parties,  
27 there really is no adversity on these issues,  
28 nor are there factual disputes. So I think

1 it would be fair for your Honor to ask the  
2 Catalina Parties to what extent what  
3 issues -- without revealing litigation  
4 strategy, like, what issues and what  
5 adversity are there on specific items? I  
6 really can't see any.

7 And if that's the case, then Cal  
8 Advocates' witnesses are going to appear.  
9 And it will be a line of questioning that  
10 will be -- just be objected to and, most  
11 likely, sustained, given that the  
12 cross-examination procedure would be thwarted  
13 and not being used in the proper procedure.

14 ALJ TOY: Mr. Bishton, do you have a  
15 response with regards to the specific issues?

16 MR. BISHTON: I'm not prepared today,  
17 your Honor. I didn't prepare to address  
18 that, so I can't address it specifically.  
19 Those objections can be made during the  
20 cross-examination. And until you see the --  
21 and hear the actual questions being asked,  
22 it's hard to determine whether they are  
23 proper or not. But we have different  
24 positions on certain items between the two  
25 entities. ]

26 ALJ TOY: Okay.

27 MR. FINKELSTEIN: Your Honor, Bob  
28 Finkelstein for TURN.

1                   Could I be heard on this?

2                   ALJ TOY:   Sure.

3                   MR. FINKELSTEIN:   TURN doesn't have a  
4   horse in this race, as they say, but I'd  
5   point out that in several decades of  
6   experience before the Commission I've never  
7   been in a proceeding where there is any sort  
8   of blanket prohibition on witnesses even  
9   appearing because of the potential for  
10   friendly cross-examination.

11                  I understand Mr. Sung's point that  
12   there might be more objections than we've  
13   heard up to this point in the hearings and  
14   there might be a need to limit the  
15   cross-examination as it's happening, but I --  
16   it would be unheard of, at least in my  
17   experience, to make some sort of  
18   before-the-fact prohibition on that basis.

19                  The other thing I'd point out as to  
20   this need to establish adversity is the  
21   Commission's process is different than --  
22   just to state the obvious, the Commission's  
23   process is different than private litigation  
24   where the goal here is at least partly is to  
25   make sure the Commission has as well of a  
26   developed record as it can get for purposes  
27   of its decision-making process.  And to the  
28   extent that the Catalina parties cross of Cal

1 Advocates' witnesses can help clarify that  
2 record, I think the Commission ought to be  
3 fully welcoming of that kind of development.

4           It sounds like Mr. Bishton that  
5 that's at worst the kind of cross that he  
6 has. Mr. Bishton is clearly a very  
7 experienced practitioner. If he -- he knows  
8 better than to stray into friendly cross.  
9 And if he crosses that line and does so,  
10 Edison's fully capable of objecting at that  
11 time.

12           So I'd urge you to just let the  
13 hearings go forward and let these witnesses  
14 appear and let Mr. Bishton do his  
15 cross-examination and we'll see how it turns  
16 out.

17           ALJ TOY: Yeah, in reviewing the  
18 documents I see that Cal Advocates and the  
19 Catalina parties do certainly have different  
20 stances on particular issues.

21           The current plan will be to allow  
22 the current schedule to go through and allow  
23 Catalina parties to cross Mr. Roberts and  
24 Mr. Ronco. And SCE is certainly allowed to  
25 make its objections if necessary.

26           So the current plan is to move up  
27 Mr. Finkelstein's testimony to the 7th and to  
28 eliminate the cross of Ms. Rogers that was

1 planned for the 14th meaning we will conduct  
2 the cross of Mr. Roberts and Mr. Ronco for  
3 Public Advocates and Mr. Finkelstein on  
4 behalf of TURN on the 7th. That should be  
5 the last day of evidentiary hearings.

6 Do any of the parties have any  
7 further comments starting with SCE?

8 MR. SUNG: No, your Honor.

9 ALJ TOY: Thank you.

10 Public Advocates?

11 MR. FISHER: No other comments, your  
12 Honor.

13 ALJ TOY: Thank you.

14 TURN?

15 MR. FINKELSTEIN: No other comments,  
16 your Honor. Thank you.

17 ALJ TOY: Mr. Bishton?

18 MR. BISHTON: No other comments, your  
19 Honor.

20 ALJ TOY: Thank you. I will adjourn  
21 the evidentiary hearing for today. Thank you  
22 all for your participation.

23 Off the record. ]

24 (Whereupon, at the hour of 10:55  
25 a.m. this matter having been continued  
26 to 9:00 a.m. March 7, 2022, via Webex,  
the Commission then adjourned.)

27 \* \* \* \* \*

28



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE  
STATE OF CALIFORNIA

CERTIFICATION OF TRANSCRIPT OF PROCEEDING

I, KARLY POWERS, CERTIFIED SHORTHAND REPORTER  
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CSR NO. #13991

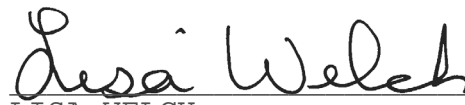
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A handwritten signature in black ink that reads "Lisa Welch". The signature is written in a cursive, flowing style.

LISA WELCH  
CSR NO. 10928


BEFORE THE PUBLIC UTILITIES COMMISSION  
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REBEKAH L. DE ROSA  
CSR NO. 8708

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