



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

**FILED**  
12/02/20  
04:59 PM

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.

**Application No. A.20-10-018**  
(Filed October 30, 2020)

**EXHIBIT 3 (of 5)  
TO THE**

**PROTEST OF**

**CITY OF AVALON  
CATALINA ISLAND CHAMBER OF COMMERCE  
SANTA CATALINA ISLAND COMPANY  
SANTA CATALINA ISLAND CONSERVANCY  
GUIDED DISCOVERIES  
HAMILTON COVE HOMEOWNERS ASSOCIATION**

**BISHTON • GUBERNICK**  
Norris J. Bishton, Jr. - SBN 49160  
Jeffrey S. Gubernick - SBN 139590  
6701 Center Drive West, Suite 925  
Los Angeles, CA 90045  
Telephone: (310) 337-4866  
Fax: (310) 337-4860  
E-mail: [norris@bishgub.com](mailto:norris@bishgub.com)  
[bishgub@aol.com](mailto:bishgub@aol.com)

**Attorneys for Protestants**

**EXHIBIT 3**

**ANSWER TO INTERROGATORY NO. 30**



Jan 13 2010  
5:59PM

CARLSMITH BALL LLP  
James Polish (SBN 058034)  
Johnny Q. Tran (SBN 252330)  
444 South Flower Street, 9th Floor  
Los Angeles, CA 90071-2901  
Telephone: 213.955.1200  
Facsimile: 213.623.0032  
Email: [jpolish@carlsmith.com](mailto:jpolish@carlsmith.com)

Leon Bass, Jr. (SBN 127403)  
David B. Coher (SBN 230617)  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 Walnut Grove Avenue, Third Floor  
Rosemead, CA 91770  
Telephone: 626.302.6060  
Facsimile: 626.302-6962  
Email: [david.coher@sce.com](mailto:david.coher@sce.com)

Attorneys for Defendant  
Southern California Edison Company

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES  
*Central Civil West Courthouse*

MARTIN CURTIN et al.,

Plaintiffs,

v.

SOUTHERN CALIFORNIA EDISON  
COMPANY, etc., et al.,

Defendant.

CASE NO. BC417712

Assigned to: Judge Carl J. West  
Department: 311 – Central Civil West

DEFENDANT SOUTHERN CALIFORNIA  
EDISON COMPANY'S RESPONSES TO  
FIRST SET OF SPECIALLY PREPARED  
INTERROGATORIES PROPOUNDED BY  
PLAINTIFFS

Complaint Filed: July 13, 2009

PROPOUNDING PARTIES: Plaintiffs Martin Curtin, Roy C. Rose, Miguel Bonilla,  
and Hamilton Cove Homeowners Association

RESPONDING PARTY: Defendant Southern California Edison Company

SET NO.: ONE [INTERROGATORIES 1-80]

1 Interrogatory 4.

2 **SPECIAL INTERROGATORY NO. 29**

3 From and after the FIRE PROTECTION CHARGE COMMENCEMENT DATE did SCE  
4 indicate on bills sent to water customers on Catalina Island for FIRE PROTECTION that the  
5 justification for the service charge was Schedule W-1, General Metered Fresh Water Service?

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 29**

7 SCE does not have personal knowledge sufficient to respond fully to this interrogatory.  
8 Based on a reasonable and good faith effort to obtain the information, SCE responds as follows:  
9 The billing information available to SCE dating back to 2006 reflects that Schedule W-1 was  
10 specifically referenced. SCE has no information that the practice was different before that date.

11 **SPECIAL INTERROGATORY NO. 30**

12 For each of the years after the FIRE PROTECTION CHARGE COMMENCEMENT  
13 DATE, indicate the amount of money SCE made or lost in connection with its water operation on  
14 Catalina Island.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 30**

16 SCE does not have personal knowledge sufficient to respond fully to this interrogatory.  
17 Based on a reasonable and good faith effort to obtain the information, SCE responds as follows:  
18 The earliest account for SCE fire protection service that SCE has been able to identify was  
19 opened on February 9, 1977. Accordingly, SCE will use 1977 as the first year for the purpose of  
20 responding to this interrogatory. SCE has not yet determined the amount of money made or lost  
21 for 2009.

22

23	<u>Year</u>	<u>Net Operating Income for</u>
24		<u>Water Utility (\$)</u>
25	1977	-102,870
26	1978	-16,561
27	1979	-400,708
28	1980	-190,280

	<u>Year</u>	<u>Net Operating Income for</u> <u>Water Utility (\$)</u>
1		
2		
3	1981	44,531
4	1982	-33,338
5	1983	-67,566
6	1984	228,209
7	1985	283,762
8	1986	320,437
9	1987	323,399
10	1988	287,720
11	1989	297,947
12	1990	219,109
13	1991	-46,670
14	1992	56,539
15	1993	226,487
16	1994	183,648
17	1995	221,200
18	1996	274,227
19	1997	452,381
20	1998	449,969
21	1999	513,150
22	2000	439,920
23	2001	547,819
24	2002	369,808
25	2003	-468,493
26	2004	-528,159
27	2005	-1,306,661
28		

<u>Year</u>	<u>Net Operating Income for</u>
	<u>Water Utility (\$)</u>
2006	-864,929
2007	-726,181
2008	629,001

**SPECIAL INTERROGATORY NO. 31**

IDENTIFY any and all DOCUMENTS that reflect the amount of money SCE made or lost in connection with its water operation on Catalina Island from and after the FIRE PROTECTION CHARGE COMMENCEMENT DATE.

**RESPONSE TO SPECIAL INTERROGATORY NO. 31**

Pursuant to the parties' agreement, this interrogatory has been limited to call for one or more DOCUMENTS that contain the requested information instead of "any and all" DOCUMENTS.

SCE objects to this interrogatory on the grounds that it necessitates a compilation or summary of SCE's records in order to respond to the interrogatory, such a compilation does not presently exist, and the burden or expense of preparing or making it would be substantially the same for the interrogating party as for the responding party. Without waiving this objection, SCE responds as follows:

SCE does not have personal knowledge sufficient to respond fully to this interrogatory. Based on a reasonable and good faith effort to obtain the information, the earliest account for SCE fire protection service that SCE has been able to identify was opened on February 9, 1977. Accordingly, SCE will use 1977 as the first year for the purpose of responding to this interrogatory. SCE has not yet determined the amount of money made or lost for 2009.

In response to Request for Production No. 9 of Plaintiffs' First Set of Request For Production of Documents SCE will produce or make available for inspection records from which the requested information may be obtained for the period 1977 to 2008.

The person most knowledgeable concerning such DOCUMENTS is Walter Wong.