

March 26, 2025

Ms. Debbie-Anne Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Dear Ms. Reese:

Pursuant to Section 205 of the Federal Power Act and Section 35.13 of the Federal Energy Regulatory Commission's ("Commission" or "FERC") Regulations under the Federal Power Act (18 C.F.R. § 35.13), and as required by Appendix IX of Southern California Edison Company's ("SCE") Transmission Owner Tariff, FERC Electric Tariff, Third Revised Volume No. 6 ("TO Tariff"),¹ SCE submits its annual update to its Post Retirement Benefits Other than Pensions ("PBOPs") stated amount of the Authorized PBOPs Expense Amount, to be included for recovery in SCE's Formula Transmission Rate ("Formula Rate"). SCE's proposed revision to the Authorized PBOPs Expense Amount is submitted under the "single-issue" filing provisions of SCE's Formula Rate Protocols, which state that "the sole issues that can or shall be addressed are whether the changes

¹ Attachment 1 to Appendix IX is the Formula Rate Protocols, and Attachment 2 to Appendix IX is the Formula Rate Spreadsheet. Section 8.c of the Formula Rate Protocols provides that "SCE shall make a single-issue Section 205 filing by April 1 of each year to revise the Authorized PBOPs Expense Amount, seeking an effective date of January 1 of the year of the filing."

proposed by SCE are consistent with these Protocols and are just and reasonable.”² Accordingly, no other issues should be at issue in this limited single-issue filing.

In this filing, SCE is seeking to reflect an Authorized PBOPs Expense Amount of \$0 to become effective January 1, 2025. This amount of \$0 reflects no change from the currently effective Authorized PBOPS Expense Amount of \$0. This filing is required pursuant to the Formula Rate Protocols, which provide that “SCE shall make a single-issue Section 205 filing by April 1 of each year to revise the Authorized PBOPs Expense Amount, seeking an effective date of January 1 of the year of the filing.”³ SCE is not proposing to revise the currently-effective Retail or Wholesale Base Transmission Revenue Requirement (“TRR”), or any associated rates.

The documents submitted with this filing consist of this letter of transmittal and all attachments hereto, and the revisions to the TO Tariff in both clean and redline format.

I. BACKGROUND

On April 11, 2019, in Docket No. ER19-1553-000, SCE filed to amend the TO2018 Formula Rate (“TO2019A Formula Rate”) proposing tariff changes necessary to reflect dramatic regulatory and financial conditions that had changed since the submission of the TO2018 Formula Rate. On June 11, 2019, the Commission accepted SCE’s TO2019A Formula Rate and related revised 2019 Base TRR, suspended it for a nominal period, to become effective November 12, 2019, subject to refund, and established hearing and settlement judge procedures. On July 1, as amended on July 2, 2020, SCE filed an Offer of Settlement in

² Section 8 of the Formula Rate Protocols.

³ Section 8.c of the Formula Rate Protocols

Docket No. ER19-1553 to resolve all issues set for hearing. On September 23, 2020, the Commission issued a Letter Order approving the settlement.⁴

SCE's Formula Rate Spreadsheet consists of 35 individual schedules that calculate different aspects of SCE's Base TRR and associated rates. PBOPs expenses are included in FERC Account 926 "Employee Pensions and Benefits," an Administrative and General "A&G" account, in accordance with the FERC Uniform System of Accounts. The Formula Rate provides for inclusion of a stated amount of PBOPs expenses, called the "Authorized PBOPs Expense Amount" through the A&G Expense component of the Base TRR.⁵ Any difference between SCE's actual PBOPs expenses and the stated value of the Authorized PBOPs Expense Amount is excluded from recovery, as calculated on Schedule 20 of the Formula Rate Spreadsheet. The Authorized PBOPs Expense Amount is currently \$0, as filed in Docket No. ER24-1627. In accordance with Commission policy, the Authorized PBOPs Expense Amount can only be revised pursuant to Commission approval of a Section 205 filing requesting a new amount.⁶

SCE is required pursuant to the currently effective Formula Rate Protocols to make a single-issue Section 205 filing to revise its stated Authorized PBOPs

⁴ 172 FERC ¶ 61,270. Since the settlement SCE has made several 205 filings to make discrete revisions to the TO2019A Formula Rate, none relate to PBOPs.

⁵ SCE's Formula Rate allocates only a portion of total A&G expenses to the Commission-jurisdictional Base TRR, primarily based on the Labor Allocation Factor, currently about 5.88%. Most A&G expenses, including PBOPs expenses, are recovered through the California Public Utility Commission ("CPUC") jurisdictional rates.

⁶ See Commission's Statement of Policy on PBOPs issued December 17, 1992 in AI93-4. 61 FERC ¶ 61,330 (1992); *order on reh'g*, 65 FERC ¶ 61,035 (1993). The Commission reiterated the policy in *Vermont Yankee Nuclear Power Corp.*, 120 FERC ¶ 61,043 at P8, stating that "[t]he Commission requires companies to file changes in their PBOP expense prior to passing through jurisdictional wholesale rates."

Expense Amount every year, beginning in 2019.⁷ The condition is stated in Section 8b of the currently-effective Formula Rate Protocols:

“With respect to Post-Retirement Benefits Other than Pensions (“PBOPs”), the Formula Rate identifies an Authorized PBOPs Expense Amount in Note 3 on Schedule 20 (Administrative and General Expenses), which is initially stated as \$40,171,333. Beginning in 2019, SCE shall make a single-issue Section 205 filing by April 1 of each year to revise the Authorized PBOPs Expense Amount, seeking an effective date of January 1 of the year of the filing.”

The requirement to submit a PBOPs filing each year by April 1 allows SCE to incorporate the proposed Authorized PBOPs Expense Amount as a cost of service element in SCE’s Annual Update submitted by December 1 of the filing year. Specifically, assuming timely Commission acceptance of SCE’s filed Authorized PBOPs Expense Amount, SCE will include the current value in the TO2026 Annual Update,⁸ to be filed by December 1, 2025.

II. PROPOSED REVISIONS TO SCE’S AUTHORIZED PBOPS EXPENSE AMOUNT

SCE requests that the Commission approve an Authorized PBOPs Expense Amount of \$0 with an effective date of January 1, 2025. SCE’s proposed Authorized PBOPs Expense Amount is supported by SCE’s PBOPs Funding

⁷ The requirement under SCE’s revised Formula Rate Protocols to submit a filing seeking to revise the Authorized PBOPs Expense Amount each year beginning in 2019 is a revision from the mechanism in SCE’s Original Formula Rate (i.e., the formula rate that was in effect from January 1, 2012 through December 31, 2017 pursuant to Docket No. ER11-3697), which required filings every other year, if certain conditions were met. See Section 8b of SCE’s Original Formula Rate Protocols. This revision—to require annual filings—was initially established in SCE’s Formula Rate that was in effect from January 1, 2018 through November 11, 2019 pursuant to Docket No. ER18-169, and continues to be a requirement in SCE’s currently effective Formula Rate Protocols.

⁸ The “TO2026 Annual Update” refers to SCE’s Transmission Owner 2026 Annual Update that will set SCE’s Base Transmission Revenue Requirement and associated rates for the 2026 year.

Memo (Attachment 1 to this filing) and SCE's 2024 Postretirement Health and Life Benefits report (Attachment 2 to this filing). The proposed \$0 value is shown in the PBOPs Funding Memo (Attachment 1), on Line 4 "2024 Rate recovery"⁹ The \$0 2024 Rate recovery Amount shown on Line 4 of the Funding Memo (Attachment 1) results from the negative 2024 Net periodic benefit cost/(income) for both the Represented and the Management groups (Line 1).

Since SCE's proposed Authorized PBOPs Expense Amount is the same as the current amount of \$0, it will result in no change to SCE's Base TRR, if approved by the Commission. SCE's Formula Rate recovers a portion of the total Authorized PBOPs Expense Amount through the Formula Base Transmission Revenue Requirement, with the remainder being recovered through SCE's California Public Utilities Commission jurisdictional rates. The Commission-jurisdictional portion is based on SCE's Formula Rate labor allocation factor, currently about 5.88%. Accordingly, SCE's Formula Rate Base Transmission Revenue Requirement would be the same (\$0 - \$0 times the labor allocation factor of about 5.88%).

III. EFFECTIVE DATE

Pursuant to Section 8b of the Formula Rate Protocols, SCE requests that the Commission authorize the revised Authorized PBOPs Expense Amount of \$0, to become effective January 1, 2025. Acceptance of the proposed amount on the requested effective date will allow SCE to incorporate the same value in the TO2026 Annual Update process setting the Base TRR and associated rates for the 2026 year, including the posting of the TO2026 Draft Annual Update by June 15, 2025, and the filing of the TO2025 Annual Update by December 1, 2025.

⁹ The "2024 Rate recovery" is the amount that is either: (1) used to pay for retiree benefits directly, or (2) contributed to irrevocable benefit trusts relating to PBOPs.

Attached to this filing are clean and redline tariff sheets reflecting the proposed Authorized PBOPs Expense Amount, as shown on Schedule 20, Note 3, Line a of the Formula Rate Spreadsheet. Section 8b of the Formula Rate Protocols states that in the event that SCE makes a Section 205 filing to revise the Authorized PBOPs Expense Amount, the revisions shall become effective for the year in which the filing is being made. The specific revision to the Formula Rate Spreadsheet is to revise Schedule 20 A&G Expenses, Note 3, Line a from the current value of \$0 to the proposed value of \$0.

IV. COMMUNICATIONS

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

Jerry Huerta
Senior Attorney
Southern California Edison Company
P.O. Box 800
Rosemead, CA 91770
Tel. (626) 949-3825

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

V. SERVICE

Copies of this filing have been served on all parties to Docket Nos. ER25-550, ER24-439, and ER19-1553 including the CPUC, as well as the California Independent System Operator (“CAISO”).

VI. OTHER FILING REQUIREMENTS

There are no forecast changes in revenues resulting from the revisions to the Formula Rate proposed in this filing. If the Commission approves the proposed revised Authorized PBOPs Expense Amount for 2025, SCE's TO2026 Base TRR for 2026 will be unaffected by any change in the Authorized PBOPs Expense Amount.

No expenses or costs included in the rates tendered herein have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative or unnecessary costs that are demonstrably the product of discriminatory employment practices.

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

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

Very truly yours,

/s/ Jeffrey L. Nelson

Jeffrey L. Nelson

CERTIFICATE OF SERVICE

I hereby certify that I have, this day, served a true copy of “**REVISION TO FORMULA RATE TARIFF AUTHORIZED 2025 POST RETIREMENT BENEFITS OTHER THAN PENSIONS (PBOPs) OF SOUTHERN CALIFORNIA EDISON COMPANY (“SCE”)**” on the official service list(s) for FERC dockets ER19-1553, ER24-439 and ER25-550 including to the California Public Utilities Commission (“CPUC”), and the California Independent System Operator (“CAISO”). Service was effected by transmitting the copies via email to all parties.

Dated at Rosemead, California this **26th**, day of **March 2025**.

/s/Sandra Sedano

Sandra Sedano
Sr. Specialist, Legal Support
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770
sandra.sedano@sce.com

2025 PBOPs FILING SERVICE LIST

<p>Aguirre & Severson, LLP Michael Aguirre 501 West Broadway Suite 1050 San Diego, CALIFORNIA 92101 maguirre@amslawyers.com</p>	<p>Aguirre & Severson, LLP Maria Byrnes Legal Assistant, 501 West Broadway Suite 1050 San Diego, CALIFORNIA 92101 mbyrnes@amslawyers.com</p>
<p>Aguirre & Severson, LLP Maria Severson 501 West Broadway Suite 1050 San Diego, CALIFORNIA 92101 mseverson@amslawyers.com</p>	<p>Bear Valley Electric Service, Inc. Randolph Elliott McCarter & English, LLP 1301 K Street N.W. Washington, DISTRICT OF COLUMBIA 20005 UNITED STATES relliott@mccarter.com</p>
<p>Bear Valley Electric Service, Inc. Julie Roberts Energy Supply Specialist Bear Valley Electric Service 42020 GARSTIN DR BIG BEAR LAKE, CALIFORNIA 92315 julie.roberts@bvesinc.com</p>	<p>California Department of Water Resources State Water Project Thomas Trauger Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DC 20006 tom.trauger@spiegelmc.com</p>
<p>California Department of Water Resources Trong Bui PO Box 899 Sacramento, CALIFORNIA UNITED STATES Trong.Bui@water.ca.gov</p>	<p>California Department of Water Resources Amanda C. Drennen Attorney Spiegel & McDiarmid LLP 1818 N Street, NW 8th Floor WASHINGTON, DISTRICT OF COLUMBIA 20036 amanda.drennen@spiegelmc.com</p>
<p>California Department of Water Resources State Water Project Lisa Dowden Senior Counsel Spiegel & McDiarmid LLP 1818 N Street, NW 8th Floor WASHINGTON, DISTRICT OF COLUMBIA 20036 UNITED STATES Lisa.Dowden@spiegelmc.com</p>	<p>California Department of Water Resources State Water Project E Service Spiegel & McDiarmid LLP 1875 Eye St, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 eService@spiegelmc.com</p>

<p>California Department of Water Resources State Water Project Matthew J Goldman Deputy Attorney General California Department of Justice PO Box 944255 Sacramento, CALIFORNIA matthew.goldman@doj.ca.gov</p>	<p>California Department of Water Resources State Water Project Masoud Shafa California Department of Water Resources PO Box 889 Sacramento, 94236 Masoud.Shafa@water.ca.gov</p>
<p>California Department of Water Resources State Water Project Samuel B. Whillans Spiegel & McDiarmid LLP 1818 N ST NW 8TH Floor WASHINGTON, DISTRICT OF COLUMBIA 20036 samuel.whillans@spiegelmc.com</p>	<p>California Department of Water Resources State Water Project Robert S Hedrick Office of the General Counsel PO Box 899 SACRAMENTO, Robert.Hedrick@water.ca.gov</p>
<p>California Department of Water Resources State Water Project Robin Hennessy Office of the General Counsel California Department of Water Resources PO Box 899 SACRAMENTO, CALIFORNIA UNITED STATES robin.hennessy@water.ca.gov</p>	<p>California Department of Water Resources State Water Project Stephen C. Pearson Spiegel & McDiarmid LLP 1818 N Street, NW 8th Floor WASHINGTON, DISTRICT OF COLUMBIA 20036 steve.pearson@spiegelmc.com</p>
<p>California Public Utilities Commission Gregory Heiden 505 Van Ness Ave. San Francisco, CALIFORNIA 94102 UNITED STATES gregory.heiden@cpuc.ca.gov</p>	<p>California Public Utilities Commission David Fermino 505 Van Ness Avenue San Francisco, CALIFORNIA 94102 UNITED STATES david.fermino@cpuc.ca.gov</p>
<p>California Public Utilities Commission Christine Jun Hammond Attorney- Legal Division 505 Van Ness Ave. San Francisco, CALIFORNIA 94102-3298 christine.hammond@cpuc.ca.gov</p>	<p>California Public Utilities Commission Lee Cordner GridSME LLC 487 Lanthorn Ln Gearhart, OREGON 97138 UNITED STATES lcordner@gridsme.com</p>
<p>California Public Utilities Commission Simon Hurd Supervisor 505 VAN NESS AVE SAN FRANCISCO, CALIFORNIA 94102 Simon.Hurd@cpuc.ca.gov</p>	<p>California Public Utilities Commission Louis Torres 505 VAN NESS AVE Room 4-A SAN FRANCISCO, CALIFORNIA 94102 UNITED STATES Louis.Torres@cpuc.ca.gov</p>

<p>California Public Utilities Commission Elaine Sison-Lebrilla elaine.sison-lebrilla@cpuc.ca.gov</p>	<p>California Public Utilities Commission Geneva Looker Senior Associate Whitfield Russell Associates 4232 King Street Alexandria, VIRGINIA 22302 UNITED STATES glooker@wrassoc.com</p>
<p>California Public Utilities Commission Kelsey Choing 505 Van Ness Avenue San Francisco, CALIFORNIA 94102 kelsey.choing@cpuc.ca.gov</p>	<p>California Public Utilities Commission Clark Palmer GridSME LLC 145 Parkshore Drive Folsom, CALIFORNIA 95630 UNITED STATES cpalmer@gridsme.com</p>
<p>California Public Utilities Commission Matthew Kahal mkahal@comcast.net</p>	<p>California Public Utilities Commission Tim Mason GridSME LLC 145 Parkshore Drive Folsom, CALIFORNIA 95630 UNITED STATES tmason@gridsme.com</p>
<p>California Public Utilities Commission Inna Vinogradov 505 VAN NESS AVENUE SAN FRANCISCO, CALIFORNIA 94102 inna.vinogradov@cpuc.ca.gov</p>	<p>California Public Utilities Commission Jan Mitchell GridSME LLC 145 Parkshore Drive Folsom, CALIFORNIA 95630 UNITED STATES jmittchell@gridsme.com</p>
<p>California Public Utilities Commission Yasemin Akay 505 Van Ness Ave San Francisco, CALIFORNIA 94102 yasemin.akay@cpuc.ca.gov</p>	<p>California Public Utilities Commission John Gavin GridSME LLC 145 Parkshore Drive Folsom, CALIFORNIA 95630 UNITED STATES jgavin@gridsme.com</p>
<p>California Public Utilities Commission Christofer Nolan 505 VAN NESS AVE SAN FRANCISCO, CALIFORNIA 94102 christofer.nolan@cpuc.ca.gov</p>	<p>California Public Utilities Commission Pouneh Ghaffarian 505 Van Ness Avenue San Francisco, CALIFORNIA 94102 pouneh.ghaffarian@cpuc.ca.gov</p>
<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Joshua Adrian Attorney</p>	<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Jenna E. Cliatt Attorney</p>

<p>Thompson Coburn LLP 1909 K ST NW STE 600 WASHINGTON, DC 20006 UNITED STATES jadrian@thompsoncoburn.com</p>	<p>Thompson Coburn LLP 1909 K St NW Suite 600 Washington, DISTRICT OF COLUMBIA 20006 jcliatt@thompsoncoburn.com</p>
<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Margaret Elizabeth McNaul Attorney Thompson Coburn LLP 1909 K Street, N.W. Suite 600 Washington, DISTRICT OF COLUMBIA 20006 mmcnaul@thompsoncoburn.com</p>	<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Rebecca Shelton Thompson Coburn LLP 1909 K Street NW Suite 600 Washington, DISTRICT OF COLUMBIA 20006 rshelton@thompsoncoburn.com</p>
<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Griffin Rice Attorney Thompson Coburn LLP 1909 K Street NW Suite 600 WASHINGTON, DISTRICT OF COLUMBIA 20006 UNITED STATES grice@thompsoncoburn.com</p>	<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Thomas (Tom) A. Miller tmiller@ci.banning.ca.us</p>
<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Jim Steffens City of Banning, California 176 East Lincoln BANNING, CALIFORNIA 92220 jsteffens@banningca.gov</p>	<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Joe Hoffman GDS Associates, Inc. 111 N. Orange Avenue #710 Orlando, FLORIDA 32801 UNITED STATES joe.hoffman@gdsassociates.com</p>
<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Breandan Mac Mathuna GDS Associates, Inc. 1850 PARKWAY PL STE 800 MARIETTA, GEORGIA 30067</p>	<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Patrick Brin Senior Project Manager GDS Associates, Inc. 111 N. Orange Avenue, Suite 750 Orlando, FLORIDA 32801</p>

<p>UNITED STATES breandan.macmathuna@gdsassociates.com</p>	<p>UNITED STATES patrick.brin@gdsassociates.com</p>
<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Steven Hunt GDS Associates, Inc. 6005 BRICKER RD DAYTON, MARYLAND 21036 UNITED STATES steven.hunt@gdsassociates.com</p>	<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Ren Zhang Utilities Planning Manager City of Colton, California 650 N. La Cadena Drive COLTON, CALIFORNIA 92324 UNITED STATES rzhang@coltonca.gov</p>
<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Marvin Moon AGM Power Delivery City of Pasadena, California 100 N. Garfield Avenue PASADENA, CALIFORNIA 91101 UNITED STATES mmoon@cityofpasadena.net</p>	<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Kelly Nguyen City of Pasadena, California 100 N. Garfield Avenue PASADENA, CALIFORNIA 91101 UNITED STATES kellynguyen@cityofpasadena.net</p>
<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Susan Wilson City of Riverside, California 3900 Main Street Riverside, CALIFORNIA 92522 UNITED STATES swilson@riversideca.gov</p>	<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Cindi Cohen City of Riverside, California 3435 14th Street Riverside, CALIFORNIA 92501 UNITED STATES ccohen@riversideca.gov</p>
<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Scott Lesch City of Riverside, California 3901 Orange Street Riverside, CALIFORNIA 92501 UNITED STATES slesch@riversideca.gov</p>	<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Richard Torres City of Azusa, California 729 N. Azusa Ave Azusa, CALIFORNIA 91702 UNITED STATES rtorres@azusaca.gov</p>
<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Neng Xu Utility Principal Resource Anl CITY OF RIVERSIDE PUBLIC UTIL</p>	<p>Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Alfred Busbee Sr. Project Mgr GDS Associates, Inc.</p>

DEPT 3435 14th Street Riverside, CALIFORNIA 92501 nxu@riversideca.gov	1850 PARKWAY PL SE STE 800 MARIETTA, GEORGIA 30067 UNITED STATES alfred.busbee@gdsassociates.com
Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Carrie A Thompson Principal Integrated Resources City of Anaheim, California 201 S ANAHEIM BLVD STE 802 ANAHEIM, CALIFORNIA 92805 cathompson@anaheim.net	Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California Nicholas T Burki Integrated Resources Planner I ANAHEIM PUBLIC UTILITIES 201 S. Anaheim Blvd. Suite 802 Anaheim, CALIFORNIA 92805 Nburki@anaheim.net
City and County of San Francisco Theresa L Mueller Deputy City Attorney City Attorney's Office 1390 MARKET ST FL 4 SAN FRANCISCO, CALIFORNIA 94102 theresa.mueller@sfcityatty.org	City and County of San Francisco E Service Spiegel & McDiarmid LLP 1875 Eye St, NW Suite 700 Washington, DC 20006 eService@spiegelmc.com
City and County of San Francisco Dan Willis Sr. Regulatory and Legislative San Francisco Public Utilities Comm. 525 Golden Gate Ave San Francisco, CALIFORNIA 94102 dwillis@sflower.org	City of Santa Clara, California and M-S-R Public Power Agency Manuel Pineda MPineda@SantaClaraCA.gov
City of Santa Clara, California and M-S-R Public Power Agency Peter Scanlon Partner Duncan, Weinberg, Genzer & Pembroke PC 1667 K ST NW STE 700 WASHINGTON, DC 20006 UNITED STATES pjs@dwgp.com	City of Santa Clara, California and M-S-R Public Power Agency Martin Hopper General Manager msr.general.manager@gmail.com
City of Santa Clara, California Kevin Kurzeja Duncan Weinberg Genzer & Pembroke, PC 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006	City of Santa Clara, California and M-S-R Public Power Agency Lisa Gast Attorney Duncan, Weinberg, Genzer & Pembroke PC 1667 K ST NW STE 700 WASHINGTON, DC 20006

UNITED STATES KMK@dwgp.com	UNITED STATES lsg@dwgp.com
Energy Producers & Users Coalition Maurice Brubaker, Managing Principal Brubaker & Associates, Inc. PO Box 412000 Chesterfield, CALIFORNIA 63141-2000 Saint Louis mbrubaker@consultbai.com	Energy Producers & Users Coalition NORA SHERIFF Energy Producers & Users Coalition 55 Second St., 17th Fl. San Francisco, CALIFORNIA 94105 nsheriff@buchalter.com
Federal Energy Regulatory Commission Ryan Walsh Commission Staff Counsel Ryan.Walsh@ferc.gov	Federal Energy Regulatory Commission Michael Loatman Commission Staff Counsel 888 First St. NE Washington, DC 20426 Michael.Loatman@ferc.gov
Golden State Water Company Allen O'Neil, Partner McCarter & English, LLP 1301 K Street, NW Suite 1000 West Washington, DC 20005 aoneil@mccarter.com	GridLiance West LLC Jay Carriere Vice President, Federal Govern Gridliance 201 East John Carpenter Freeway Suite 900 Irving, TEXAS 75062 UNITED STATES jcarriere@gridliance.com
Imperial Irrigation District Jamie Asbury Imperial Irrigation District 1561 Main Street El Centro, CALIFORNIA 92243 jlasbury@IID.com	Imperial Irrigation District Michael Postar, Attorney Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, N.W., Suite 700 Washington, DC 20006 mrp@dwgp.com
Imperial Irrigation District Harry Dupre Senior Paralegal 1667 K Street, NW Suite 700 Washington, DC 20006 had@dwgp.com	Imperial Irrigation District Sean Neal, Attorney Duncan, Weinberg, Genzer & Pembroke PC 915 L Street Suite 1410 Sacramento, CALIFORNIA 95814 smn@dwgp.com
Los Angeles Department of Water & Power Syndi Driscoll Deputy City Attorney 221 North Figueroa St LOS ANGELES, CALIFORNIA 91002 syndi.driscoll@ladwp.com	Los Angeles Department of Water & Power Suzanne Keppeler McBride Van Ness Feldman LLP 2000 PENNSYLVANIA AVE NW STE 6000 WASHINGTON, DISTRICT OF COLUMBIA 20006 UNITED STATES

	skm@vnf.com
Los Angeles Department of Water & Power Faranak Sarbaz Electrical Engineer, Grid Plan LADWP 111 N. Hope Street, Room 1246 Los Angeles, CALIFORNIA 90012 UNITED STATES faranak.sarbaz@ladwp.com	Los Angeles Department of Water & Power David Cohen CEO DBC Consulting Economist Corp. 2855 SW SCENIC DR PORTLAND, OREGON 97225 UNITED STATES dbcohen13@gmail.com
Modesto Irrigation District Martin Caballero Modesto Irrigation District P.O. Box 4060 Modesto, CALIFORNIA 95352 UNITED STATES martin.caballero@mid.org	Modesto Irrigation District James McFall jamesm@mid.org
Modesto Irrigation District Sean Neal, Attorney Duncan, Weinberg, Genzer & Pembroke PC 915 L Street Suite 1410 Sacramento, CALIFORNIA 95814 smn@dwgp.com	Modesto Irrigation District Lauren Perkins Duncan Weinberg Genzer & Pembroke, PC 915 L Street, Suite 1410 Sacramento, CALIFORNIA 95814 lmp@dwgp.com
Northern California Power Agency Michael Postar Attorney Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, N.W., Suite 700 Duncan Weinberg Genzer & Pembroke Washington, DC20006 UNITED STATES mrp@dwgp.com	Northern California Power Agency Lisa Dowden Senior Counsel Spiegel & McDiarmid LLP 1875 Eye Street, NW Suite 700 Washington, DC 20006 Lisa.Dowden@spiegelmc.com
Northern California Power Agency Gelane Diamond 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES gld@dwgp.com	Northern California Power Agency Julie L Smith Legal Assistant Duncan, Weinberg, Genzer & Pembroke, P.C. 1667 K Street, N.W., Suite 700 Washington, DISTRICT OF COLUMBIA 20006 JLS@dwgp.com
Northern California Power Agency E Service Spiegel & McDiarmid LLP	Northern California Power Agency Sylwia Dakowicz

<p>1875 Eye St, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 eService@spiegelmc.com</p>	<p>Duncan Weinberg Genzer & Pembroke, PC 1036 Vanderbilt Way Sacramento, CALIFORNIA 95825 UNITED STATES sd@dwgp.com</p>
<p>Northern California Power Agency Randy Howard Northern California Power Agency 651 Commerce Drive Roseville, CALIFORNIA 95678 Randy.Howard@ncpa.com</p>	<p>Pacific Gas and Electric Company Charles Middlekauff, Attorney Pacific Gas and Electric Company PO Box 7442 San Francisco, CA 94120-7442 crmd@pge.com</p>
<p>Pacific Gas and Electric Company Moshreq Sobhy Principal Analyst Pacific Gas and Electric Company FERC Electric Proceedings Department 300 Lakeside Dr. OAKLAND, CALIFORNIA 94612 Moshreq.Sobhy@pge.com</p>	<p>Pacific Gas and Electric Company PG&E Law Dept FERC Cases INDIVIDUAL 300 Lakeside Drive Suite 210 Oakland, CALIFORNIA 94612 lawferccases@pge.com</p>
<p>PUBLIC CITIZEN, INC Tyson Slocum, Director Public Citizen's Energy Program 215 Pennsylvania Ave SE Washington, DC 20003 UNITED STATES tslocum@citizen.org</p>	<p>San Diego Gas & Electric Company Ross Fulton, Senior Counsel 8330 Century Park Court San Diego, CALIFORNIA 92123 UNITED STATES rfulton@sdge.com</p>
<p>State Water Contractors Bhaveeta Mody Duncan, Weinberg, Genzer & Pembroke PC 1667 K ST NW STE 700 WASHINGTON, DISTRICT OF COLUMBIA 20006 UNITED STATES bkm@dwgp.com</p>	<p>State Water Contractors Jonathan Young State Water Contractors 1121 L ST STE 1050 SACRAMENTO, CALIFORNIA 95814 jyoung@swc.org</p>
<p>State Water Contractors Sean Neal Attorney Duncan, Weinberg, Genzer & Pembroke PC 915 L ST STE 1410 SACRAMENTO, CALIFORNIA 95814 UNITED STATES smn@dwgp.com</p>	<p>State Water Contractors Julie L Smith Legal Assistant Duncan, Weinberg, Genzer & Pembroke, P.C. 1667 K Street, N.W., Suite 700 Washington, DISTRICT OF COLUMBIA 20006 JLS@dwgp.com</p>

<p>State Water Contractors Lauren Perkins Duncan Weinberg Genzer & Pembroke, PC 915 L Street, Suite 1410 Sacramento, CALIFORNIA 95814 lmp@dwgp.com</p>	<p>State Water Contractors Sylwia Dakowicz Duncan Weinberg Genzer & Pembroke, PC 1036 Vanderbilt Way Sacramento, CALIFORNIA 95825 UNITED STATES sd@dwgp.com</p>
<p>State Water Contractors Gelane Diamond 1667 K Street, NW Suite 700 Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES gld@dwgp.com</p>	<p>Transmission Agency of Northern California Michael Postar, Attorney Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, N.W., Suite 700 Duncan Weinberg Genzer & Pembroke Washington, DISTRICT OF COLUMBIA 20006 UNITED STATES mrp@dwgp.com</p>
<p>Transmission Agency of Northern California Bhaveeta Mody Duncan, Weinberg, Genzer & Pembroke PC 1667 K Street, N.W. Suite 700 Washington, D.C., DC 20006 bkm@dwgp.com</p>	<p>Transmission Agency of Northern California Clarence R Hawkes, III Duncan, Weinberg, Genzer & Pembroke, P.C. 1667 K Street, NW, Suite 700 Washington, DC 20006 crh@dwgp.com</p>
<p>California Independent System Operator Corporation Regulatory Contracts regulatorycontracts@caiso.com</p>	<p>California Independent System Operator Corporation caisotariff@caiso.com</p>