SOUTHERN CALIFORNIA EDISON®
An EDISON INTERNATIONAL® Company

James A. Cuillier
Director
FERC Rates & Regulation

March 29, 2013

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Dear Ms. Bose:

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), Southern California Edison Company ("SCE") submits proposed changes to SCE's retail transmission rates to reflect Decision 13-03-031 (the "Phase 2 Order") of the California Public Utilities Commission ("CPUC"), issued on March 21, 2013. Additionally in this filing, SCE is proposing revisions to SCE's formula transmission rate ("Formula Rate") set forth in Attachment 1 to Appendix IX of SCE's Transmission Owner Tariff, FERC Electric Tariff, Third Revised Volume No. 6 ("TO Tariff") in order to conform the Formula Rate calculation of retail transmission rates with the Phase 2 Order. These proposed changes to SCE's retail transmission rates and SCE's Formula Rate are being submitted as a "single-issue" filing pursuant to the Protocols of the Formula Rate.

SCE is required pursuant to the Protocols of the Formula Rate to make a single-issue Section 205 filing to revise its retail transmission rates whenever the CPUC issues a final order that changes "Rate Groups, Rate Schedules, or the design of retail rates applicable to each Rate Schedule".[1]

[1] Section 8 of Appendix IX of SCE's TO Tariff.

P.O. Box 800
2244 Walnut Grove Ave.
Rosemead, CA 91770

> "With respect to the formula determination of retail transmission rates, SCE shall be required to make a single-issue Section 205 filing to revise the formula determination of retail transmission rates to reflect any change in Rate Groups, Rate Schedules, or the design of retail rates applicable to each Rate Schedule subsequent to any Final CPUC Order that affects these aspects of retail transmission rates. In the single-issue Section 205 filing to the Commission, SCE shall propose conforming revisions to its formula determination of retail transmission rates. The effective date of the revisions to the formula determination of retail transmission rates shall be the same date as the CPUC decision became effective." (Section 8 of Appendix IX of SCE's TO Tariff)

The Phase 2 Order makes revisions affecting SCE's retail rate design and the definitions of Rate Groups and Rate Schedules, with an effective date of April 1, 2013. Mr. Robert A. Thomas explains the aspects of the Phase 2 Order that affect SCE's retail transmission rates in his attached Affidavit (Exhibit A). SCE is submitting this filing to revise its retail transmission rates to conform with the order and its currently-effective Protocols.

The documents submitted with this filing consist of this letter of transmittal and all attachments hereto; the revisions to the TO Tariff in both clean and redline format; the affidavit of Robert A. Thomas (Exhibit A); and a copy of the Proposed Phase 2 Order (Exhibit B).[2]

I. BACKGROUND

SCE submitted the Formula Rate to the Commission on June 3, 2011 in Docket No. ER11-3697. On August 2, 2011, the Commission, among other things, accepted for filing and suspended the Formula Rate, to be effective on

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[2] The CPUC approved the Phase 2 Order on March 21, 2013. However, as of the date of this filing, a final copy is unavailable. Exhibit B is the proposed (draft) Phase 2 Order. The final Phase 2 Order included some amendments that have no impact to the Rate Group and Rate Schedule changes discussed in the affidavit of Robert A. Thomas. The amendments address a subject not related to retail transmission rates, the implementation timing of mandatory time-of-use rates with default dynamic pricing for some Rate Groups.

January 1, 2012, subject to refund, hearing and settlement procedures. While settlement procedures continue, SCE's Formula Rate remains in effect.

Pursuant to the Formula Rate update procedures set forth in the Formula Rate Protocols, SCE is required to submit an annual update by each September 15 updating the formula inputs based on updated cost and forecast information, and calculating the Formula Rate outputs including SCE's Retail Base TRR and retail transmission rates. The protocols state that the revised retail Base TRR and associated retail transmission rates become effective each October 1. SCE submitted its first annual update on September 14, 2012, revising the Retail Base TRR to $900 million effective October 1, 2012, as well as revising the retail transmission rates to recover that amount.

SCE's Formula Rate is set forth in Appendix IX of SCE's TO Tariff, and includes an Attachment 1 consisting of many individual schedules that calculate different aspects of SCE's Retail Base TRR and associated rates. Schedule 33 calculates SCE's retail transmission rates. Schedule 33 sets forth the precise set of formulas by which retail transmission rates are calculated given the Retail Base TRR (calculated elsewhere in the Formula Rate) and forecast sales and billing determinants. When Schedule 33 is populated with inputs such as the sales forecast, billing determinants, 12-CP data, and names of Rate Groups and Rate Schedules it yields retail transmission rates that recover the Retail Base TRR.

On March 21, 2013, the CPUC issued the Phase 2 Order, which addresses rate design issues related to SCE's recent final decision in its CPUC General Rate Case ("GRC").[3] The Phase 2 Order revises several aspects of retail rate design effective on April 1, 2013. As a result, SCE's retail transmission rates filed in the September 14, 2012 annual update are now inconsistent with the

[3] SCE generally follows a three-year rate GRC cycle at the CPUC. On November 29, 2012 the CPUC issued the final GRC decision for the 2012 test year (D.12-11-051), setting SCE's total CPUC-jurisdictional revenue requirements. The Phase 2 Order designs CPUC-jurisdictional rates to recover the revenue requirement determined in D.12-11-051, as well as making certain revisions to rate design.

CPUC Phase 2 Order retail rate design. SCE is making this single-issue Section 205 filing to request the Commission approval to make necessary revisions to conform to the rate design reflected in the Phase 2 Order. The changes to the Schedule 33 of the Formula Rate and inputs are explained in Exhibit A, the Affidavit of Mr. Robert A. Thomas. In this filing, SCE is not proposing to revise any other aspect of the Formula Rate other than those necessary to correctly reflect the Phase 2 Order, including Schedule 33 Formula Rate inputs such as the aggregate sales forecast data, or to revise the Retail Base TRR.

II. PROPOSED REVISIONS TO SCE'S RETAIL TRANSMISSION RATES

As discussed above, in this single-issue filing SCE is only seeking to revise its retail transmission rates and Formula Rate to maintain consistency with the Phase 2 Order. SCE is not proposing to revise the currently-effective Retail Base TRR or any aspect of the Formula Rate tariff other than the portion that calculates retail transmission rates (Schedule 33 of Attachment 1 to Appendix IX).

Attachment 1 to the affidavit of Robert A. Thomas presents the revised Formula Rate Schedule 33 with all inputs included, as well as tying to the currently effective Retail Base TRR from SCE's September 14, 2012 annual update filing. The inputs to the revised Schedule 33 of the Formula Rate include the Rate Groups and Rate Schedules consistent with the Phase 2 Order, as well as forecast load data and billing determinants associated with the new Rate Groups and Rate Schedules. The forecast load data and billing determinants are in aggregate the same as those included in SCE's September 14, 2012 annual update.

Attachment 2 to the affidavit of Mr. Robert A. Thomas shows the resulting retail transmission rates that SCE is proposing to become effective April 1, as well as the currently-effective retail transmission rates from SCE's annual update filed

September 14, 2012. Since each of these sets of rates is designed to collect SCE's Retail Base TRR, there is no overall change in revenues to be collected. However, because the Phase 2 Order makes some changes to the Rate Groups, and in some instances moves customers between Rate Groups, there are some differences in retail transmission rates and revenues collected for individual Rate Groups or Schedules. Attachment 2 to the Affidavit of Mr. Robert A. Thomas also shows the revenue impacts for each retail Rate Group. In total, the revenues still recover the same $900 million retail Base TRR from SCE's September 14, 2012 annual update, but since the Rate Groups themselves are being revised, there are revenue impacts for individual Rate Groups.

III. EFECTIVE DATE

Pursuant to Section 8 of Appendix IX of SCE's TO Tariff, SCE requests that the Commission authorize the proposed changes to SCE's retail transmission rates, and to Schedule 33 of SCE's Formula Rate included in Attachment 1 to Appendix IX of SCE's TO Tariff, to become effective on April 1, 2013, the date that the Phase 2 Order becomes effective. Section 8 of the Formula Rate Protocols states that the effective date of the revised retail transmission rates and Formula Rate will be "the same date as the CPUC decision became effective". Additionally, an effective date of April 1, 2013 is necessary in order that SCE's retail rate structure, including retail transmission rates as well as CPUC-jurisdictional rate components, remain internally consistent and compatible at the CPUC and at FERC.

SCE respectfully requests, pursuant to Section 35.11 (18 C.F.R. §35.11) of the Commission's Regulations, waiver of the 60-day prior notice requirement specified in Section 35.3. Good cause exists for such waiver to be granted for the reasons stated above, in addition to the fact that the CPUC Phase 2 Order was not issued until March 21, 2013, only eleven days in advance of its effective date.

Waiver would also be consistent with the Commission's policy set forth in *Central Hudson Gas & Electric Cor*p., 60 FERC ¶ 61,106 at 61,338, reh'g denied, 61 FERC ¶ 61,089 (1992), in which the Commission explained that it would "generally grant waiver of the 60-day prior notice requirement for filings that increase rates when the rate change and the effective date are prescribed by contract, such as annual rate revisions required by contract to become effective on a date specified in the contract...." as well as for "uncontested filings that do not change rates." Here, the effective date of the rate change is prescribed by the rate schedule, and the filing does not increase the total revenues to be collected. The filing thus qualifies for waiver of the 60-day prior notice requirement under Commission policy.

IV. COMMUNICATIONS

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

Anna Valdberg
Southern California Edison Company
P.O. Box 800
Rosemead, CA 91770
Tel. (626) 302-1058

James A. Cuillier
Director, FERC Rates & Regulation
Southern California Edison Company
P.O. Box 800
Rosemead, CA 91770

V. SERVICE

Copies of this filing have been served on all parties to Docket No. ER11-3697.

VI. OTHER FILING REQUIREMENTS

The forecast annualized change in revenues resulting from the revised rates proposed in this filing are set forth in Attachment 2 to Exhibit A.

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,

James A. Cuillier

EXHIBIT A

Affidavit of Robert A. Thomas

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Southern California Edison Company) Docket No. ER13-___-000

AFFIDAVIT OF ROBERT A. THOMAS
FOR SOUTHERN CALIFORNIA EDISON COMPANY

I, Robert A. Thomas, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. My name is Robert A. Thomas. I am the Manager of Rate Design in the Regulatory Operations Department at Southern California Edison Company ("SCE"). My business address is 8631 Rush Street, Rosemead, California 91770.

2. I am submitting this affidavit on behalf of SCE. The statements made herein are true and correct to the best of my knowledge and belief, and I adopt them as my sworn testimony in this proceeding.

3. I have worked for SCE for 23 years. In my current position as Manager of Rate Design I am responsible for the development of SCE's retail level rate designs. I have held this position since November 20, 2006. Prior to my present position, my responsibilities have included Manager of the Analysis and Program Support Group within SCE's Business Customer Division, where I was responsible for providing customer specific rate and financial analyses involving self-generation, load growth, contract rates, and hourly pricing options. Prior to this position, I was SCE's Program Manager for the Self Generation Incentive Program ("SGIP"). In this position I was responsible for all aspects of the program including processing of applications, promotion of the program, and dispute resolution.

4. I received a Bachelor of Science and Engineering degree from the University of Arizona, a Professional Engineer License in Mechanical Engineering, and a Masters in Business Administration from California State Polytechnic University, Pomona.

5. I have submitted testimony to this Commission in SCE's 2008 through 2013 Reliability Services filings (Docket Nos. ER08-82, ER09-95, ER10-105, ER11-1974, ER12-201, and ER13-227), and in SCE's TO4, TO5, and TO6 transmission rate case proceedings (Docket Nos. ER08-1343, ER09-1534, and ER11-3697).

6. The purpose of my affidavit is to describe SCE's proposed revisions to the retail rate module of the SCE's formula transmission rate ("Formula Rate") necessary to implement the California Public Utilities Commission ("CPUC") decision on SCE's retail rate design issued on March 21, 2013. Additionally, I describe the determination of revised retail rates that SCE proposes to become effective on April 1, 2013 pursuant to this proposed retail rate module.

7. My affidavit is organized as follows:

- In Section II, I provide background on SCE's Formula Rate and the calculation of retail transmission rates under the Formula Rate;
- In Section III, I describe the CPUC Phase 2 decision on retail rate design issued on March 21, 2013;
- In Section IV, I describe the revisions to the retail rate module of the Formula Rate necessary to conform to the CPUC Phase 2 decision on retail rate design; and
- In Section V, I present SCE's proposed retail transmission rates determined pursuant to the revised retail transmission rate module of the Formula Rate.

II. BACKGROUND ON SCE'S FORMULA RATE

8. SCE filed the currently-effective Formula Rate in June of 2011 in Docket No. ER11-3697. In an order issued on August 2, 2011, the Commission accepted for filing and suspended the Formula Rate, to be effective on January 1, 2012, subject to refund, hearing and settlement procedures. Additionally, the Commission ordered SCE to make a compliance filing revising the Return on Equity component of the Formula Rate, which SCE submitted on September 1, 2011. The Commission accepted SCE's compliance filing in an Order issued on November 30, 2011, subject to the outcome of the pending hearing and settlement procedures. The Formula Rate is currently in settlement. While the settlement process continues, SCE's Formula Rate as filed in the compliance filing[1] submitted on September 1, 2011 remains in effect.

9. Included in the Formula Rate is a module that determines SCE's retail transmission rates, based on the retail Base Transmission Revenue Requirement ("Base TRR") and SCE's forecast sales and billing determinants. This retail rate determination module is contained in Schedule 33 of the Formula Rate. Schedule 33 of the Formula Rate is designed to determine retail rates based on the 12-CP cost allocation method, consistent with Commission policy. Schedule 33 also is designed to be consistent with the current CPUC retail rate design, which was determined in SCE's 2012 General Rate Case. My testimony in SCE's Formula Rate filing in Docket No. ER11-3697 explains the filed and currently-effective Schedule 33.

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[1] The ROE issue is, however, currently subject to the outcome of an appeal pending at the D.C. Circuit.

10. Pursuant to Section 8 of the Protocols of the Formula Rate, when the CPUC issues a Final CPUC Order affecting retail rate design, SCE must then make a "single issue" Section 205 filing to the Commission proposing to revise its retail rates in conformance with the CPUC Final Order:

> "With respect to the formula determination of retail transmission rates, SCE shall be required to make a single-issue Section 205 filing to revise the formula determination of retail transmission rates to reflect any change in Rate Groups, Rate Schedules, or the design of retail rates applicable to each Rate Schedule subsequent to any Final CPUC Order that affects these aspects of retail transmission rates. In the single-issue Section 205 filing to the Commission, SCE shall propose conforming revisions to its formula determination of retail transmission rates. The effective date of the revisions to the formula determination of retail transmission rates shall be the same date as the CPUC decision became effective." (Section 8 of Appendix IX of SCE's Transmission Owner Tariff)

III. THE CPUC RETAIL RATE DESIGN DECISION

11. On March 21, 2013, the California Public Utilities Commission (CPUC) issued Decision (D.) 13-03-031 in SCE's 2012 GRC Phase 2 proceeding. The Decision adopts six settlement agreements[2] addressing marginal costs, revenue allocation, and rate design. Three of the agreements, discussed below, adopt new Rate Groups and eliminate some existing Rate Groups thus necessitating a change to the Formula Rate. Additionally, SCE will implement rates in accordance with the 2012 GRC Phase 2 on April 1, 2013. Consistent with the Formula Rate protocols, SCE proposes the revised retail transmission rates become effective on this same date.

12. In the Small Commercial and Industrial Rates Settlement Agreement, the CPUC adopts a new demand based TOU rate, Schedule TOU-GS-1 Option B, which includes a non-time differentiated facilities demand component comprised of transmission charges for the small

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[2] Settlement agreements were reached in the following areas: Marginal Cost and Revenue Allocation; Residential Rate Design; Small Commercial and Industrial Rates; Medium and Large Commercial and Industrial Rates, Agriculture and Pumping Rates and; Streetlight and Traffic Control Rates.

commercial and industrial class. Previously customers in this class could only take service on a flat seasonal rate or a non-demand based TOU rate. Both of these options recover transmission revenues through $/kWh charges. Because the current Formula Rate does not calculate a demand ($/kW) charge for the small commercial and industrial class, SCE is adjusting the Formula Rate to calculate a demand charge for TOU-GS-1-B customers. The new demand based retail rate will be applied to the customers' non-time-related peak demand, as is the practice for all other retail transmission demand charges.

13. The second agreement driving a change to the Formula Rate is the Medium and Large Commercial Industrial Rate settlement agreement, where the CPUC adopted separate voltage differentiated Rate Groups for customers with onsite generation units, referred to as Standby customers and those without on-site generation, referred to as non-Standby. Currently both types of customers are represented in combined Rate Groups for each voltage level. The service voltage levels applicable to the new Standby and non-Standby classes are the same as those applied to the existing combined classes[3]. These new groups apply to customers with peak demands greater than 500 kW. SCE is adjusting the Formula Rate to reflect three Standby voltage differentiated Rate Groups (TOU-8 Standby-SEC, TOU-8-Standby-PRI, and TOU-8-Standby-SUB), and three non-Standby voltage differentiated Rate Groups (TOU-8-SEC, TOU-8 -PRI, and TOU-8 -SUB). Retail transmission charges will continue to be applied to customers' non-time-related monthly peak demand on a $/kW basis.

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[3] Secondary service (SEC): Service metered at voltage below 2kV; Primary service (PRI); Service metered at voltages from 2kV to 50kV and; Sub-transmission service (SUB); Service metered at voltage above 50kV. SCE also provides Distribution level voltage discount for customers receiving service at voltages above 150kV.

14. The Agriculture and Pumping Settlement Agreement is the final agreement affecting the Formula Rate. In this agreement, the CPUC adopts the creation of two new Rate Groups, TOU-PA-2 and TOU-PA-3, and the elimination of the TOU-AG and TOU-PA-5 Rate Groups. Customers from the eliminated groups were migrated into the new Rate Groups based on size. Those with demands of less than 200 kW were migrated into the TOU-PA-2 Rate Group, and those with demands between 200kW and 500kW were migrated into the TOU-PA-3 group. Customers on the existing PA-1 and PA-2 rate schedules will remain on those schedules until the first stage of mandatory TOU rates for Agriculture and Pumping customers is implemented in February of 2014. The full migration to mandatory TOU rates is expected to be complete by the second or third quarter of 2015. Allocated revenues associated with the current PA-1 and PA-2 Rate Groups are reflected in the TOU-PA-2 Rate Group revenue requirement. The retail transmission charges for Schedules PA-2, TOU-PA-2, and TOU-PA-3 will be applied to customers' non-time-related monthly peak demand on a $/kW basis, consistent with current practice on current Agriculture and Pumping Rate Schedules.

IV. REVISIONS TO THE FORMULA RATE TO CONFORM TO THE CPUC RETAIL RATE DESIGN DECISION

15. Schedule 33 is designed with the flexibility to handle changes to certain aspects of CPUC-authorized retail rate design without making a revision to the Formula Rate itself. For example, if the CPUC creates new Rate Groups or Rate Schedules, the Formula Rate can accept the new or revised Rate Groups or Schedules without revising the Formula Rate itself, because the names of the Rate Groups and Schedules are designated as inputs to the Formula Rate. However, not all aspects of prospective retail rate design can be anticipated and incorporated in a formula format. Accordingly, if the CPUC revises its rate design such that changes to the

Formula Rate itself are necessitated in order to remain consistent with the CPUC rate design, then SCE must revise the Formula Rate.

16. The Phase 2 Order summarized above affects some aspects of retail rate design that will require revisions to inputs in the Formula Rate, but not to the Formula Rate itself. These include:

a) Additional billing determinants for the optional time-of-use demand based rates within the GS-1 Rate Group;

b) Separation of the Standby billing determinants from the current Large Power Rate Groups into voltage differentiated Standby Rate Groups; and

c) Combining the billing determinants from the current Agricultural Rate Groups into TOU-PA-2 and TOU-PA-3 respectively, for demand less than 200 kW and 200 kW to 499 kW.

17. Additionally, the Phase 2 Order revised some aspects of retail rate design that will require revisions to be made to the Formula Rate itself. These include:

a) Creation of the Standby and Supplemental demand rates for the Optional time-of-use demand rates within the GS-1 Rate Group;

b) Creation of the Standby and Supplemental demand rates for the new Standby Rate Groups; and

c) Creation of the Standby and Supplemental demand rates for the new TOU-PA-2 and TOU-PA-3 Rate Groups.

18. SCE has revised Schedule 33 to include the above revisions necessary to reflect the Phase 2 Order. Attachment 1 to Exhibit A shows the proposed revised Schedule 33 of the Formula Rate Schedule 33 with inputs populated. All proposed retail transmission rates are calculated in this Attachment 1 to Exhibit A.

V. SCE'S PROPOSED RETAIL TRANSMISSION RATES

19. The following table illustrates SCE's proposed retail transmission rates determined pursuant to the revised retail transmission rate module of the Formula Rate.

Southern California Edison

Proposed FERC Retail Transmission Rates

Effective date: April 1, 2013

CPUC Rate Group	Regular Service $/kWh	Regular Service $/kW-month	Regular Service $/HP-month	Standby / Backup Service $/kW-month	Standby / Backup Service $/HP-month
Domestic [1]	0.01213				
LSMP					
GS-1 [2]	0.01218	2.24 - see Note [2]		2.08 - see Note [2]	
TC-1 [3]	0.00726				
GS-2 [4]		3.22		2.08	
TOU-GS-3 [5]		3.58		2.08	
Large Power					
TOU-8-Sec [6]		3.75			
TOU-8-Pri [6]		3.58			
TOU-8-Sub [6]		3.71			
TOU-8-Standby-Sec [7]		3.64		2.08	
TOU-8-Standby-Pri [7]		4.54		1.58	
TOU-8-Standby-Sub [7]		3.45		0.65	
Ag. & Pumping					
TOU-PA-2 [8]		1.07	0.8 - see Note [8]	1.07	0.8 - see Note [8]
TOU-PA-3 [9]		2.31		2.08	
Total Street Lights [10]	0.00482				

Notes

[1] Includes Schedules D, D-CARE, D-FERA,TOU-D-T, TOU-EV-1, TOU-D-TEV, DE, D-SDP, D-SDP-O, DM, DMS-1, DMS-2, DMS-3, and DS.

[2] Includes Schedules GS-1, TOU-EV-3, and TOU-GS-1 (Option A, B, RTP, CPP, Standby, GS-APS, and GS-APS-E). Note: The $/kW-month charge applies to the Optional demand rate schedules.

[3] Includes Schedules TC-1, Wi-Fi-1, and WTR.

[4] Includes Schedules GS-2, TOU-EV-4, and TOU-GS-2 (Option A, B, R, RTP, CPP, Standby, GS-APS, and GS-APS-E).

[5] Includes Schedules TOU-GS-3-CPP, and TOU-GS-3 (Option A, B, R, RTP, SOP, Standby, TOU-BIP, GS-APS, and GS-APS-E).

[6] Includes Schedules TOU-8-CPP, TOU-8-RBU, and TOU-8 (Option A, B, R, RTP, TOU-BIP, GS-APS, and GS-APS-E).

[7] Includes Schedules TOU-8-Standby (Option B, RTP, TOU-BIP, GS-APS, and GS-APS-E).

[8] Includes Schedules PA-1, PA-2, TOU-PA-ICE, and TOU-PA-2 (Option A, B, RTP, SOP-1, SOP-2, CPP, Standby, and AP-I). Note: The $/HP-month charge applies to horsepower rates such as PA-1.

[9] Includes Schedules TOU-PA-3-CPP, and TOU-PA-3 (Option A, B, RTP, SOP-1, SOP-2, Standby, and AP-I).

[10] Includes Schedules AL-2, DWL, LS-1, LS-2, LS-3, and OL-1.

VI. CONCLUSION

20. My affidavit demonstrates that the revisions SCE is proposing to Schedule 33 of the formula transmission rate are necessary to properly reflect the Phase 2 Order. Additionally, the retail transmission rates calculated utilizing the revised Schedule 33 presented in Attachment 1, and also summarized above, are correctly calculated utilizing the revised Schedule 33 and should be allowed to become effective on April 1, 2013 by the Commission in accordance with SCE's Formula Rate Protocols.

I declare under penalty of perjury that the foregoing statements are true to the best of my knowledge, information, and belief. Executed this 28 day of March, 2013, at Rosemead, California.

Robert A. Thomas

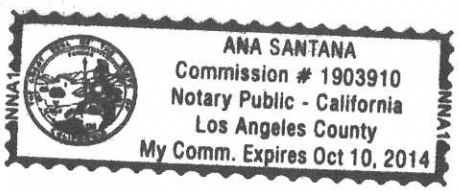
State of California)
County of Los Angeles)

On March 28, 2013, before me, ANA SANTANA, personally appeared Robert A. Thomas, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature of Notary Public



Dated: March 28, 2013

EXHIBIT A

Attachment 1

Proposed Schedule 33 with Inputs

Calculation of SCE Retail Transmission Rates

		Source
Retail Base TRR:	899,888,718	BaseTRR WS, Line 86

Input cells are shaded yellow

1) Derivation of "Total Demand Rate" and "Total Energy Rate":

Line		Col 1 Note 1	Col 2	Col 3 Note 2	Col 4 Note 3	Col 5 Note 4	Col 6	Col 7	Col 8 Note 5	Col 9 Note 5	Col 10 Note 5	Col 11
				Sales Forecast Billing Determinants:					Recorded Billing Determinants: to be applied to the Supplemental kW demand charges, and the Contracted Standby kW demand charges			
			= Retail Base TRR * Line1:Col1	Applies to kWh charges	Applies to supplemental kW demand charges	Applies to contracted standby kW demand charges	= Line1:Col2 / (Line1:Col3*10^6)	= Line1:Col2 / ((Line1:Col 4 + Line1:Col5)*10^3)				
	CPUC Rate Group	**12-CP factors**	**Total Allocated costs**	**GWh**	**Maximum demand - MW**	**Standby demand - MW**	**Total energy rate - $/kWh**	**Total demand rate - $/kW-month**	**GWh**	**Maximum demand - MW**	**Standby demand - MW**	**Notes**
1a	Domestic	39.34%	$354,011,573	29,173	0	0	$0.01213					
1b	GS-1	6.81%	$61,279,582	5,031	0	1	$0.01218		4,206	22,840	1	
1b$_2$	GS-1 continued							$2.24	$51,232,678		$2.24	Note 6
1c	TC-1	0.05%	$477,338	66	0	0	$0.00726					
1d	GS-2	18.97%	$170,742,357	15,280	52,936	36		$3.22				
1e	TOU-GS-3	9.77%	$87,944,835	8,537	24,506	90		$3.58				
1f	TOU-8-SEC	9.45%	$85,042,932	8,958	22,703			$3.75				
1g	TOU-8-PRI	5.42%	$48,740,124	5,778	13,627			$3.58				
1h	TOU-8-SUB	4.80%	$43,190,601	6,306	11,632			$3.71				
1i	TOU-8-Standby-SEC	0.23%	$2,064,968	251	303	464		$2.69				
1j	TOU-8-Standby-PRI	0.71%	$6,410,173	655	879	1,532		$2.66				
1k	TOU-8-Standby-SUB	1.62%	$14,608,616	1,869	2,597	8,739		$1.29				
1l	TOU-PA-2	1.20%	$10,754,082	1,743	10,082	6		$1.07				
1m	TOU-PA-3	1.23%	$11,108,300	1,201	4,797	5		$2.31				
1n	Street Lighting	0.39%	$3,513,236	728	0	0	$0.00482					
1o	---											
2	Totals:	100.00%	$899,888,718	85,577	144,060	10,872						

2) Determination of Standby Demand Rates for Rate Groups

		Col 1	Col 2	Col 3	Col 4	Col 5	Col 6	Col 7
		from Line1:Col2	from Line44:Col3	from Line44:Col4	= Line9:Col2 / Line9:Col3	= Line9:Col1 * Line9:Col4	from Lin1:Col5	= Line9:Col5 / Line9:Col6 / 10^3
9	**CPUC Rate Group**	**Total Allocated costs**	**Adjusted 12-CP at backup load**	**Adjusted 12-CP at total load**	**Backup allocation factors**	**Backup revenue requirement**	**Standby demand - MW**	**Contracted standby kW demand Charge - $/kW**
9a	TOU-8-Standby-SEC	$2,064,968	199	428	0.47	$962,884	464	2.08
9b	TOU-8-Standby-PRI	$6,410,173	501	1327	0.38	$2,420,229	1532	1.58
9c	TOU-8-Standby-SUB	$14,608,616	1169	3025	0.39	$5,646,055	8739	0.65
9d	---							

3) End-User Transmission Rates

	Col 1	Col 2	Col 3	Col 4	Col 5	Col 6	Col 7	Col 8	Col 9	Col 10
	from Line1:Col2	= Line16:Col1 - Line16:Col3	= Line16:Col7 * Line1:Col5 *10^3		= Line16:Col2 / (Line1:Col3 * 10^6)	= Line16:Col2 / Line1:Col4 / 10^3	from Line9:Col7	= Line16:Col6 * 0.746	= Line16:Col7 * 0.746	
			Note 7			Note 8	Note 9			
CPUC Rate Group	Total Allocated costs	Revenue associated with Supplemental Demand or Energy	Standby Demand Revenue		Energy Charge - $/kWh	Supplemental Demand Charge - $/kW-month	Contracted standby kW demand Charge - $/kW-month	Supplemental Demand Charge - $/HP-month	Contracted standby kW demand Charge - $/HP-month	Notes
Domestic	$354,011,573	$354,011,573			$0.01213					
GS-1	$61,279,582	$61,278,062	$1,520		$0.01218	$2.24	$2.08			Note 10
TC-1	$477,338	$477,338			$0.00726					
GS-2	$170,742,357	$170,666,938	$75,420			$3.22	$2.08			
TOU-GS-3	$87,944,835	$87,758,604	$186,231			$3.58	$2.08			
TOU-8-SEC	$85,042,932	$85,042,932				$3.75				
TOU-8-PRI	$48,740,124	$48,740,124				$3.58				
TOU-8-SUB	$43,190,601	$43,190,601				$3.71				
TOU-8-Standby-SEC	$2,064,968	$1,102,084	$962,884			$3.64	$2.08			
TOU-8-Standby-PRI	$6,410,173	$3,989,945	$2,420,229			$4.54	$1.58			
TOU-8-Standby-SUB	$14,608,616	$8,962,561	$5,646,055			$3.45	$0.65			
TOU-PA-2	$10,754,082	$10,747,775	$6,307			$1.07	$1.07	$0.80	$0.80	Note 11
TOU-PA-3	$11,108,300	$11,098,555	$9,745			$2.31	$2.08			
Street Lighting	$3,513,236	$3,513,236			$0.00482					

Totals:	$899,888,718	$890,580,328	$9,308,391							

Notes:

1) See Col 9 of Lines 35a, 35b, 35c, etc.
2) Sales forecast in total Giga-watt hours usage - applies to non-demand charge schedules, represents the customers' total annual GWh usage
3) Sales forecast pertaining to the sum of monthly maximum supplemental Mega-watt demand, applies to demand charge schedules
4) Sales forecast pertaining to the sum of monthly contracted standby Mega-watt demand, applies to standby schedules
5) Recorded sales from Sample meters adjusted for population - use to set the total demand rate for the optional time-of-use schedules within the GS-1 rate group
6) Total demand rate for the optional time-of-use schedules within the GS-1 rate group, = (Line1b:Col6 * Line1b:Col8 *10^6) / ((Line1b:Col9 + Line1b:Col10) * 10^3). Line $1b_2$:Col8 = Line 1b:Col6 * Line 1b:Col8 * 10^6.
7) For optional time-of-use schedules within the GS-1 rate group, = (Line16:Col7 * Line1b:Col10 *10^3)
8) For optional time-of-use schedules within the GS-1 rate group (Line16b:Col6), = (Line$1b_2$:Col8 - Line16:Col3) / Line1b:Col9 / 10^3
9) For the non TOU-8-Standby rate group, it is the minimum of Line16i:Col7, or the total demand rate in Line1:Col7
10) Applicable to time-of-use schedules within the GS-1 rate group
11) Applicable to the optional schedules that contain horse power charge such as PA-1

Rate Schedules in each CPUC Rate Group:

CPUC Rate Group	Rate Schedules included in Each Rate Group in the Rate Effective Period
Domestic	Includes Schedules D, D-CARE, D-FERA,TOU-D-T, TOU-EV-1, TOU-D-TEV, DE, D-SDP, D-SDP-O, DM, DMS-1, DMS-2, DMS-3, and DS.
GS-1	Includes Schedules GS-1, TOU-EV-3, and TOU-GS-1 (Option A, B, RTP, CPP, Standby, GS-APS, and GS-APS-E).
TC-1	Includes Schedules TC-1, Wi-Fi-1, and WTR.
GS-2	Includes Schedules GS-2, TOU-EV-4, and TOU-GS-2 (Option A, B, R, RTP, CPP, Standby, GS-APS, and GS-APS-E).
TOU-GS-3	Includes Schedules TOU-GS-3-CPP, and TOU-GS-3 (Option A, B, R, RTP, SOP, Standby, TOU-BIP, GS-APS, and GS-APS-E).
TOU-8-SEC	Includes Schedules TOU-8-CPP, TOU-8-RBU, and TOU-8 (Option A, B, R, RTP, TOU-BIP, GS-APS, and GS-APS-E).
TOU-8-PRI	Includes Schedules TOU-8-CPP, TOU-8-RBU, and TOU-8 (Option A, B, R, RTP, TOU-BIP, GS-APS, and GS-APS-E).
TOU-8-SUB	Includes Schedules TOU-8-CPP, TOU-8-RBU, and TOU-8 (Option A, B, R, RTP, TOU-BIP, GS-APS, and GS-APS-E).
TOU-8-Standby-SEC	Includes Schedules TOU-8-Standby (Option B, RTP, TOU-BIP, GS-APS, and GS-APS-E).
TOU-8-Standby-PRI	Includes Schedules TOU-8-Standby (Option B, RTP, TOU-BIP, GS-APS, and GS-APS-E).
TOU-8-Standby-SUB	Includes Schedules TOU-8-Standby (Option B, RTP, TOU-BIP, GS-APS, and GS-APS-E).
TOU-PA-2	Includes Schedules PA-1, PA-2, TOU-PA-ICE, and TOU-PA-2 (Option A, B, RTP, SOP-1, SOP-2, CPP, Standby, and AP-I).
TOU-PA-3	Includes Schedules TOU-PA-3-CPP, and TOU-PA-3 (Option A, B, RTP, SOP-1, SOP-2, Standby, and AP-I).
Street Lighting	Includes Schedules AL-2, DWL, LS-1, LS-2, LS-3, and OL-1.

Recorded 12-CP Load Data by Rate Group (MW)

	Col 1	Col 2	Col 3	Col 4 = Line35:(Col1+Col2 +Col3)/3	Col 5	Col 6	Col 7 from Line1:Col3	Col 8 = Line35:(Col4*Col5/ Col6*Col7)	Col 9 = Line35:(Col8 / total of Col8)
	12-CP MW								
CPUC Rate Group	2008	2009	2010	3-Year Average	Line losses	Recorded GWh (2008-2010 Average)	Sales Forecast - GWh	Loss Adjusted Average 12-CP	12-CP Allocation factors
Domestic	70,407	68,373	63,488	67,423	1.0975	29,449	29,173	73,303	39.34%
GS-1	11,486	10,675	10,675	10,946	1.0977	4,763	5,031	12,689	6.81%
TC-1	94	93	91	93	1.0987	68	66	99	0.05%
GS-2	34,335	32,332	33,001	33,223	1.0974	15,757	15,280	35,355	18.97%
TOU-GS-3	17,095	15,964	16,556	16,538	1.0969	8,505	8,537	18,210	9.77%
TOU-8-SEC	17,080	15,834	15,647	16,187	1.0979	9,040	8,958	17,609	9.45%
TOU-8-PRI	9,841	9,521	9,421	9,594	1.0688	5,871	5,778	10,092	5.42%
TOU-8-SUB	8,918	8,382	8,121	8,474	1.0335	6,175	6,306	8,943	4.80%
TOU-8-Standby-SEC	374	383	423	393	1.0979	253	251	428	0.23%
TOU-8-Standby-PRI	1,357	1,248	1,181	1,262	1.0688	666	655	1,327	0.71%
TOU-8-Standby-SUB	2,792	2,669	3,138	2,866	1.0335	1,830	1,869	3,025	1.62%
TOU-PA-2	1,348	2,842	2,569	2,253	1.0967	1,934	1,743	2,227	1.20%
TOU-PA-3	3,266	1,609	1,539	2,138	1.0954	1,223	1,201	2,300	1.23%
Street Lighting	682	790	472	648	1.1014	715	728	727	0.39%

Totals:	179,075	170,714	166,321	172,037		86,250	85,577	186,335	100.00%

Allocation Factors for Backup Rates:

	Col 1	Col 2	Col 3 =Line44:Col1 * Line44:Col2	Col 4 from Line35:Col8
CPUC Rate Group	12 CP at Backup Load	Line losses	Adjusted 12-CP at backup load	Adjusted 12-CP at total load
TOU-8-Standby-SEC	182	1.0979	199	428
TOU-8-Standby-PRI	469	1.0688	501	1327
TOU-8-Standby-SUB	1,131	1.0335	1,169	3025

EXHIBIT A

Attachment 2

Summary of Proposed and Current Rates and Revenues

Southern California Edison

Proposed FERC Retail Transmission Rates

Effective date: April 1, 2013

CPUC Rate Group	Regular Service $/kWh	Regular Service $/kW-month	Regular Service $/HP-month	Standby / Backup Service $/kW-month	Standby / Backup Service $/HP-month
Domestic [1]	0.01213				
LSMP					
GS-1 [2]	0.01218	2.24 - see Note [2]		2.08 - see Note [2]	
TC-1 [3]	0.00726				
GS-2 [4]		3.22		2.08	
TOU-GS-3 [5]		3.58		2.08	
Large Power					
TOU-8-Sec [6]		3.75			
TOU-8-Pri [6]		3.58			
TOU-8-Sub [6]		3.71			
TOU-8-Standby-Sec [7]		3.64		2.08	
TOU-8-Standby-Pri [7]		4.54		1.58	
TOU-8-Standby-Sub [7]		3.45		0.65	
Ag. & Pumping					
TOU-PA-2 [8]		1.07	0.8 - see Note [8]	1.07	0.8 - see Note [8]
TOU-PA-3 [9]		2.31		2.08	
Total Street Lights [10]	0.00482				

Notes

[1] Includes Schedules D, D-CARE, D-FERA,TOU-D-T, TOU-EV-1, TOU-D-TEV, DE, D-SDP, D-SDP-O, DM, DMS-1, DMS-2, DMS-3, and DS.

[2] Includes Schedules GS-1, TOU-EV-3, and TOU-GS-1 (Option A, B, RTP, CPP, Standby, GS-APS, and GS-APS-E). Note: The $/kW-month charge applies to the Optional demand rate schedules.

[3] Includes Schedules TC-1, Wi-Fi-1, and WTR.

[4] Includes Schedules GS-2, TOU-EV-4, and TOU-GS-2 (Option A, B, R, RTP, CPP, Standby, GS-APS, and GS-APS-E).

[5] Includes Schedules TOU-GS-3-CPP, and TOU-GS-3 (Option A, B, R, RTP, SOP, Standby, TOU-BIP, GS-APS, and GS-APS-E).

[6] Includes Schedules TOU-8-CPP, TOU-8-RBU, and TOU-8 (Option A, B, R, RTP, TOU-BIP, GS-APS, and GS-APS-E).

[7] Includes Schedules TOU-8-Standby (Option B, RTP, TOU-BIP, GS-APS, and GS-APS-E).

[8] Includes Schedules PA-1, PA-2, TOU-PA-ICE, and TOU-PA-2 (Option A, B, RTP, SOP-1, SOP-2, CPP, Standby, and AP-I). Note: The $/HP-month charge applies to horsepower rates such as PA-1.

[9] Includes Schedules TOU-PA-3-CPP, and TOU-PA-3 (Option A, B, RTP, SOP-1, SOP-2, Standby, and AP-I).

[10] Includes Schedules AL-2, DWL, LS-1, LS-2, LS-3, and OL-1.

Southern California Edison

Current FERC Retail Transmission Rates

Effective date: October 1, 2012

CPUC Rate Schedules	Regular Service $/kWh	Regular Service $/kW	Regular Service $/HP	Standby Service $/kW	Standby Service $/HP
Total Residential [1]	0.01214				
LSMP					
GS-1 [2]	0.01219				
TC-1 [3]	0.00727				
GS-2 [4]		3.23		2.06	
TOU-GS-3 [5]		3.58		2.06	
Large Power					
TOU-8-Sec [6]		3.75		2.06	
TOU-8-Pri [6]		3.64		1.56	
TOU-8-Sub [6]		3.68		0.63	
TOU-8-220 kV [6]		1.16		0.74	
Ag. & Pumping					
PA-1 [7]			0.46		0.46
PA-2 [8]		2.01		2.01	
AG-TOU [9]		1.65	1.24	1.65	1.24
TOU-PA-5 [10]		3.01		2.06	
Total Street Lights [11]	0.00483				

Notes

[1] Includes Schedules D, D-APS, D-APS-E, D-CARE, DE, D-FERA, DM, DMS-1, DMS-2, DMS-3, DS, TOU-D-1, TOU-D-2, TOU-D-T, TOU-EV-1, and TOU-D-TEV.

[2] Includes Schedules GS-1, GS-APS, GS-APS-E, TOU-EV-3, and TOU-GS-1.

[3] Includes Schedules TC-1, Wi-Fi-1, and WTR.

[4] Includes Schedules GS-2, GS-APS, GS-APS-E, and TOU-EV-4.

[5] Includes Schedules TOU-GS-3, TOU-GS-3-CPP, TOU-GS-3-SOP, TOU-BIP, GS-APS, and GS-APS-E.

[6] Includes Schedules TOU-8, TOU-8-CPP, TOU-8-RBU, RTP-2, TOU-BIP, GS-APS, and GS-APS-E.

[7] Includes Schedule PA-1, and AP-I.

[8] Includes Schedule PA-2, and AP-I.

[9] Includes Schedules TOU-PA, PA-RTP, TOU-PA-SOP, TOU-PA-ICE, and AP-I.

[10] Includes Schedule TOU-PA-5, and AP-I.

[11] Includes Schedules AL-2, DWL, LS-1, LS-2, LS-3, and OL-1.

Southern California Edison

FERC Transmission Retail Rates Impact

Proposed April 1, 2013 less Current Rates

CPUC Rate Group	Regular Service $/kWh	Regular Service $/kW-month	Regular Service $/HP-month	Standby / Backup Service $/kW-month	Standby / Backup Service $/HP-month
Domestic [1]	(0.00001)				
LSMP					
GS-1 [2]	(0.00001)	New: 2.24 - see Note [2]		New: 2.08 - see Note [2]	
TC-1 [3]	(0.00001)				
GS-2 [4]		(0.01)		0.02	
TOU-GS-3 [5]		0.00		0.02	
Large Power					
TOU-8-Sec [6]		0.00			
TOU-8-Pri [6]		(0.06)			
TOU-8-Sub [6]		0.03			
New group: TOU-8-Standby-Sec [7]		(0.11)		0.02	
New group: TOU-8-Standby-Pri [7]		0.90		0.02	
New group: TOU-8-Standby-Sub [7]		(0.23)		0.02	
Ag. & Pumping					
New group: TOU-PA-2 [8]		New: 1.07	New: 0.80 - see Note [8]	New: 1.07	New: 0.80 - see Note [8]
New group: TOU-PA-3 [9]		New: 2.31		New: 2.08	
Total Street Lights [10]	(0.00001)				

Notes

[1] Includes Schedules D, D-CARE, D-FERA,TOU-D-T, TOU-EV-1, TOU-D-TEV, DE, D-SDP, D-SDP-O, DM, DMS-1, DMS-2, DMS-3, and DS.

[2] Includes Schedules GS-1, TOU-EV-3, and TOU-GS-1 (Option A, B, RTP, CPP, Standby, GS-APS, and GS-APS-E). NOTE2: The $/kW-month charge applies to the Optional demand rate schedules.

[3] Includes Schedules TC-1, Wi-Fi-1, and WTR.

[4] Includes Schedules GS-2, TOU-EV-4, and TOU-GS-2 (Option A, B, R, RTP, CPP, Standby, GS-APS, and GS-APS-E).

[5] Includes Schedules TOU-GS-3-CPP, and TOU-GS-3 (Option A, B, R, RTP, SOP, Standby, TOU-BIP, GS-APS, and GS-APS-E).

[6] Includes Schedules TOU-8-CPP, TOU-8-RBU, and TOU-8 (Option A, B, R, RTP, TOU-BIP, GS-APS, and GS-APS-E).

[7] Includes Schedules TOU-8-Standby (Option B, RTP, TOU-BIP, GS-APS, and GS-APS-E).

[8] Includes Schedules PA-1, PA-2, TOU-PA-ICE, and TOU-PA-2 (Option A, B, RTP, SOP-1, SOP-2, CPP, Standby, and AP-I). NOTE8: The $/HP-month charge applies to horsepower rate such as PA-1.

[9] Includes Schedules TOU-PA-3-CPP, and TOU-PA-3 (Option A, B, RTP, SOP-1, SOP-2, Standby, and AP-I).

[10] Includes Schedules AL-2, DWL, LS-1, LS-2, LS-3, and OL-1.

Southern California Edison
FERC Transmission Revenue Allocation

Comparison between Current Rates and Proposed April 1, 2013 Rates

CPUC Rate Group	Current	Proposed April 1, 2013
Domestic	354,264,713	354,011,573
LSMP		
GS-1	61,323,407	61,279,582
TC-1	477,714	477,338
GS-2	170,864,448	170,742,357
TOU-GS-3	88,007,765	87,944,835
Large Power		
TOU-8-Sec	87,170,214	85,042,932
TOU-8-Pri	55,189,824	48,740,124
TOU-8-Sub	57,840,569	43,190,601
New group: TOU-8-Standby-Sec		2,064,968
New group: TOU-8-Standby-Pri		6,410,173
New group: TOU-8-Standby-Sub		14,608,616
Ag. & Pumping		
PA-1	2,576,563	
PA-2	2,189,557	
TOU-AG	15,201,272	
TOU-PA-5	1,267,395	
New group: TOU-PA-2		10,754,082
New group: TOU-PA-3		11,108,300
Total Street Lights	3,515,279	3,513,236
Totals	$899,888,718	$899,888,718