

PUBLIC UTILITIES COMMISSION

SAN FRANCISCO, CA 94102-3298



September 8, 2008

Advice Letter 2231-E-A

Akbar Jazayeri  
Vice President, Regulatory Operations  
Southern California Edison Company  
P O Box 800  
Rosemead, CA 91770

Subject: Modification of Rule 18, Supply to Separate Premises and Use  
by Others, to Allow Submetering for Cold-Ironing Loads

Dear Mr. Jazayeri:

Advice Letter 2231-E-A is effective July 7, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean H. Gallagher".

Sean H. Gallagher, Director  
Energy Division

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July 7, 2008

**ADVICE 2231-E-A**  
**(U 338-E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

**SUBJECT:** Modification of Rule 18, Supply to Separate Premises and Use  
By Others, to Allow Submetering for Cold-Ironing Loads

Southern California Edison Company (SCE) hereby submits for filing the following changes to its tariff schedules. The revised tariff sheets are listed on Attachment A and are attached hereto.

**PURPOSE**

Pursuant to Resolution E- 4173, approved on June 23, 2008, this advice letter seeks California Public Utilities Commission (Commission) approval of a modification to Rule 18 to allow SCE master-metered customers (e.g., terminal operators)<sup>1</sup> who are located in the Port of Long Beach (POLB) or the Port of Hueneme in SCE's service territory to submeter and bill "cold-ironing" load. Cold-ironing refers to the use of shore-supplied electricity for the lights, heating, cooling, machinery, and other needs of an ocean-going vessel, while at-berth or otherwise electrically connected, as replacement for the vessel's auxiliary internal combustion engines.<sup>2</sup> This advice letter replaces Advice 2231-E in its entirety.

**BACKGROUND**

The vessels, trucks, trains, and other diesel-powered equipment and harbor craft operating at ports emit air pollutants, including nitrogen oxides (NOx), sulfur oxides (SOx), particulate matter (PM), carbon monoxide, and hydrocarbons. The South Coast Air Quality Management District (SCAQMD) has identified port-related

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<sup>1</sup> SCE expects that terminal operators will generally be the master-metered customers to which the requested deviation would apply.

<sup>2</sup> Although the discussion below focuses specifically on diesel engines and resulting emissions, the deviation proposed herein would apply for "cold-ironing" of any shipboard internal combustion engine.

emissions as a significant source of air pollution in the Los Angeles region.<sup>3</sup> Of particular concern are diesel PM emissions. Diesel PM was identified as a toxic air contaminant by the California Air Resources Board (CARB) in 1998, and long-term exposures to diesel PM increase the risk of developing health problems.<sup>4</sup>

One source of air pollutants at ports are vessels docked at port which use their auxiliary internal combustion engines to meet their onboard power needs for refrigeration, lights, pumps, communications, and other functions while docked. These “hotelling” vessels emit NOx, SOx, PM, and other air pollutants from their internal combustion engines.

One approach to reducing the emission of air pollutants from hotelling vessels is called “cold-ironing.” Cold-ironing refers to the supplying of shoreside electric power for the lights, heating, cooling, machinery, and other needs of an ocean-going vessel while at port, in lieu of using the vessel’s auxiliary internal combustion engines. The CARB estimates that port electrification of a vessel can reduce its emissions of NOx and diesel PM by more than 90%.<sup>5</sup> Moreover, greenhouse gas (GHG) emissions, such as carbon dioxide, are also reduced depending on the source of the electricity provided to the vessel.<sup>6</sup>

The POLB has taken aggressive actions to significantly reduce the health risks posed by air pollution from port-related sources. In 2005, the POLB adopted a Green Port Policy for environmentally friendly port operations. The POLB also dedicated \$100 million to environmental initiatives over five years. Moreover, in 2006, the San Pedro Bay Ports of Long Beach and Los Angeles, in conjunction with the United States Environmental Protection Agency, the CARB, and the SCAQMD, developed a comprehensive and far-reaching plan to significantly reduce air pollution at the POLB and the Port of Los Angeles (POLA). The San Pedro Bay Ports Clean Air Action Plan (Clean Air Action Plan) calls for substantial reductions in air pollution from port-related sources.<sup>7</sup> Under the Clean Air Action Plan, the POLB and the POLA will implement measures that are expected to reduce NOx emissions by approximately 45%, SOx emissions by approximately 52%, and PM emissions by approximately 47%, over the next five years. One measure under the

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<sup>3</sup> See AQMD Chairman Announces Clean Port Initiative (Nov. 4, 2005) (available at <http://www.aqmd.gov/news1/2005/cleanportinitiative.html>) (“The Los Angeles-Long Beach port complex is the nation’s largest and its ocean-going ships, trains, trucks and cargo handling equipment in the aggregate are the No. 1 fixed source of air pollution in the Los Angeles Basin.”).

<sup>4</sup> CARB Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Regulations to Reduce Emissions from Diesel Auxiliary Engines on Ocean-Going Vessels While At-Berth at a California Port (Oct. 2007) at ES-2 (available at <http://www.arb.ca.gov/regact/2007/shorepwr07/isor.pdf>).

<sup>5</sup> CARB Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration (Oct. 2007) at B-28-29 (available at [http://www.arb.ca.gov/cc/ccea/meetings/ea\\_final\\_report.pdf](http://www.arb.ca.gov/cc/ccea/meetings/ea_final_report.pdf)).

<sup>6</sup> *Id.*

<sup>7</sup> The Clean Air Action Plan is available at [http://www.polb.com/environment/air\\_quality/clean\\_air\\_action\\_plan.asp](http://www.polb.com/environment/air_quality/clean_air_action_plan.asp).

Clean Air Action Plan is to equip all major container cargo and cruise ship terminals with shoreside electric facilities so that docked vessels can engage in cold-ironing.

Furthermore, the State of California has also taken action to encourage cold-ironing. In September 2006, Governor Schwarzenegger signed into law Assembly Bill 32 (AB 32), also known as the California Global Warming Solutions Act of 2006. This landmark climate change legislation attempts to address the impacts of global warming by requiring that California reduce its GHG emissions to 1990 levels by 2020.<sup>8</sup> As part of the implementation of AB 32, in June and October 2007, the CARB identified 44 early action measures to reduce GHG emissions in California – i.e., GHG reduction measures underway or to be undertaken by the CARB in the 2007 to 2012 timeframe before the main emission limits and reduction measures become operative.

One such early action measure, titled “Green Ports,” is allowing docked ships to shut off their auxiliary engines by plugging into shoreside electrical outlets or other technologies, that is, cold-ironing.<sup>9</sup> The CARB noted that cold-ironing reduces emissions of air pollutants. Although the generation of electricity to supply vessels while docked creates emissions from the power plants that produce the power, “these emissions are much less than those from the auxiliary engines located on the ships.”<sup>10</sup>

At a December 6-7, 2007 meeting, the CARB adopted regulations for California ports and certain ocean-going vessels that visit California in order to reduce emissions from vessels hotelling at a California port. The California ports covered by the regulations include the Port of Hueneme, the POLB, the POLA, the Port of Oakland, the Port of San Diego, and the Port of San Francisco. Among other things, the regulations require vessels to either shut down their auxiliary engines for most of the time while in port or to reduce emissions from those auxiliary engines by specified degrees while docked. Specifically, the vessels’ auxiliary engines must be shut down for 50% of a fleet’s total visits to a California port in 2014 and 80% of a fleet’s total visits in 2020. While the auxiliary engines are shut down, the vessels’ onboard electrical requirements would need to be satisfied by some other source of power, including shore-based sources (i.e., cold-ironing). The CARB estimates that its regulations will reduce hotelling NOx and diesel PM emissions from container ships, passenger ships, and refrigerated cargo ships by 50% and 75% relative to levels expected to be emitted in 2014 and 2020, respectively.<sup>11</sup> The CARB also

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<sup>8</sup> See Cal. Health & Safety Code § 38500 *et seq.*

<sup>9</sup> See CARB Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration (Oct. 2007) at B-28-32.

<sup>10</sup> *Id.* at B-28.

<sup>11</sup> CARB Staff Report: Initial Statement of Reasons for the Proposed Rulemaking, Regulations to Reduce Emissions from Diesel Auxiliary Engines on Ocean-Going Vessels While At-Berth at a California Port (Oct. 2007) at 14.

estimates that hotelling carbon dioxide emissions will be reduced by 122,000 to 242,000 metric tons in 2020.<sup>12</sup>

As discussed above, as part of its comprehensive strategy to significantly reduce the air pollution associated with port-related sources, the POLB has committed to installing facilities at its shipping terminals to allow for cold-ironing. The POLB and SCE have been in discussions concerning needed electrical infrastructure to accommodate cold-ironing load at the port.

Consistent with State policy encouraging the development of cold-ironing, SCE seeks to modify Rule 18 to allow master-metered customers to submeter cold-ironing load in an effort to promote cold-ironing.

### **SUBMETERING OF COLD-IRONING LOADS**

SCE proposes a modification to the Rule 18 limitation that prohibits the resale of electricity received by a customer and used by another. The modification would allow SCE master-metered customers who are located in the POLB and the Port of Hueneme to submeter and bill cold-ironing load. Rule 18.E specifies in part:

A customer shall not charge for electricity received from SCE and used by another person.

SCE's proposed rule modification allows master-metered customers in SCE's service territory to submeter and bill a tenant vessel's cold-ironing load. Rule 18 is revised to include the following:

A master-metered customer may submeter a tenant's cold-ironing load aboard an ocean-going vessel at the Port of Long Beach or the Port of Hueneme but may not submeter any other load or any land-based facility.

If the master-metered customer submeters cold-ironing load to an ocean-going vessel, the rates and charges to the submetered user for services supplied by SCE must not exceed the rates and charges the master-metered customer is billed by SCE for such services.

Cold-ironing load is defined as the use of shore-supplied electricity for the lights, heating, cooling, machinery, and other needs of an ocean-going vessel, while at-berth or otherwise electrically connected, as replacement for the vessel's auxiliary internal combustion engines.

This revised Rule 18 is required to allow master-metered customers greater flexibility in managing their electric costs to further promote and encourage cold-ironing of tenant vessels. Tenant vessels are typically in port for only a short period of time (e.g., one or two days) and are likely to have great diversity in their individual cold-ironing load. Therefore, it is not practical for the master-metered

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<sup>12</sup> *Id.* at 14.

customer to charge a set fee to all tenant vessels for cold-ironing load. The master-metered customer can more accurately bill tenant vessels by submetering their cold-ironing load, and bill the vessels based upon their individual electric load.

Furthermore, it would be inefficient and unnecessarily expensive for SCE to directly meter and bill these tenant vessels. There are a large number of tenant vessels, with no established customer relationship with SCE, who will be in port and electrically connected for purposes of cold-ironing for only short periods of time. Creating a customer relationship with each of these vessels, and metering and billing their individual cold-ironing load would be a significant and costly administrative burden for SCE. It is much more efficient for the master-metered customers (presumably the terminal operators), who have existing commercial relationships with these tenant vessels, to submeter and bill the vessels for their cold-ironing load.

Finally, SCE's proposed rule modification requires that the rates and charges billed by the master-metered customer to the submetered user for services supplied by SCE must not exceed the rates and charges the master-metered customer is billed by SCE for such services. This limitation is similar to the provision in Rule 18.F for operators of a small boat marina or harbor who are allowed to submeter tenant load aboard a boat. Rule 18.F states:

Privately or Publicly Owned Boat Marinas. SCE will furnish electrical service to a master-meter customer at a privately or publicly owned boat marina or small craft harbor. The master-meter customer may submeter tenant load aboard a vessel moored in an individual slip or berth at the marina or harbor but may not submeter any other tenant or any land-based facility.

If the master-meter marina customer submeters and furnishes electricity to an individual boat slip or berth for tenant load aboard a vessel, the rates and charges to the user must not exceed those that would apply if the user were purchasing such electricity directly from SCE.

The submetering modification will be applicable to SCE master-metered customers located at the POLB and the Port of Hueneme, consistent with the aforementioned CARB regulations, and will be restricted to cold-ironing load.

### **REQUEST FOR COMMISSION APPROVAL**

On April 1, 2008, SCE filed Advice 2231-E requesting a deviation to Rule 18 to allow submetering of cold-ironing load at POLB and Port of Hueneme. In Resolution E-4173, the Commission approved SCE's proposal to allow submetering of cold-ironing load as a modification to Rule 18, as opposed to the requested deviation.

Therefore, SCE requests Commission approval of the new revised Section G of Rule 18, Supply To Separate Premises And Use By Others, as noted above and included in the revised rule attached hereto in Attachment A.

### **TIER DESIGNATION**

Pursuant to D.07-01-024, Energy Industry Rule 5.1(1), this advice letter is submitted with a Tier 1 designation.

### **EFFECTIVE DATE**

Pursuant to Resolution E-4173, this supplemental advice letter shall be effective the date filed, subject to Energy Division's determination that it is in compliance with that Resolution.

### **NOTICE**

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be mailed to:

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, California 94102  
E-mail: [inj@cpuc.ca.gov](mailto:inj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Akbar Jazayeri  
Vice President of Regulatory Operations  
Southern California Edison Company  
2244 Walnut Grove Avenue  
Rosemead, California 91770  
Facsimile: (626) 302-4829  
E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

Bruce Foster  
Senior Vice President, Regulatory Affairs  
c/o Karyn Gansecki  
Southern California Edison Company  
601 Van Ness Avenue, Suite 2040  
San Francisco, California 94102  
Facsimile: (415) 673-1116  
E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

In accordance with Section 4 of General Order No. (GO) 96-B, SCE is serving copies of this advice filing to the interested parties shown on the attached GO 96-B service list. Address change requests to the GO 96-B service list should be directed by electronic mail to [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com) or at (626) 302-2930. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice filing at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at <http://www.sce.com/AboutSCE/Regulatory/adviceletters>.

For questions, please contact Thomas Diaz at (626) 302-4823 or by electronic mail at [Thomas.Diaz@sce.com](mailto:Thomas.Diaz@sce.com).

**Southern California Edison Company**

Akbar Jazayeri

AJ:td:sq  
Enclosures

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

- ELC       GAS  
 PLC       HEAT       WATER

Contact Person: James Yee

Phone #: (626) 302-2509

E-mail: [James.Yee@sce.com](mailto:James.Yee@sce.com)

E-mail Disposition Notice to: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas  
 PLC = Pipeline      HEAT = Heat      WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2231-E-A

Tier Designation: 1

Subject of AL: Modification of Rule 18, Supply to Separate Premises and Use By Others, to Allow Submetering for Cold-Ironing Loads

Keywords (choose from CPUC listing): Compliance, Rules, Metering

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

E-4173

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: \_\_\_\_\_

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: \_\_\_\_\_

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement.

Name and contact information to request nondisclosure agreement/access to confidential information:

Resolution Required?  Yes  No

Requested effective date: 7/7/08      No. of tariff sheets: -3-

Estimated system annual revenue effect: (%): \_\_\_\_\_

Estimated system average rate effect (%): \_\_\_\_\_

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: Rule 18 and Table of Contents

Service affected and changes proposed<sup>1</sup>: \_\_\_\_\_

Pending advice letters that revise the same tariff sheets: \_\_\_\_\_

<sup>1</sup> Discuss in AL if more space is needed.

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Ave.,  
San Francisco, CA 94102  
[inj@cpuc.ca.gov](mailto:inj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)

Akbar Jazayeri  
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E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

Bruce Foster  
Senior Vice President, Regulatory Affairs  
c/o Karyn Gansecki  
Southern California Edison Company  
601 Van Ness Avenue, Suite 2040  
San Francisco, California 94102  
Facsimile: (415) 673-1116  
E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

| Cal. P.U.C.<br>Sheet No.            | Title of Sheet                         | Cancelling Cal.<br>P.U.C. Sheet No. |
|-------------------------------------|--|-------------------------------------|
| Revised 44118-E<br>Revised 44119-E* | Rules 18<br>Rules 18                   | Revised 40769-E<br>Revised 24436-E  |
| Revised 44120-E<br>Revised 44121-E* | Table of Contents<br>Table of Contents | Revised 44030-E<br>Revised 43794-E  |

Rule 18  
SUPPLY TO SEPARATE PREMISES AND USE BY OTHERS

Sheet 1

A. Separate Metering. Separate Premises will not be supplied through the same meter nor will the electric loads of such separately metered Premises be aggregated physically, electronically or otherwise, except as may be specifically provided for in the tariff schedules.

B. Nonresidential Loads. In accordance with Rule 16, electric service shall be individually metered to each tenant in a non-residential building or group of buildings or other development on a single Premises with multiple tenants or enterprises. However, where, in the opinion of SCE, it is impractical to meter each tenant individually or where the Commission has authorized SCE to supply electric service through a single meter, SCE may provide service through a single meter subject to the provisions of Sections E and H below.

(T)

Buildings originally constructed for a non-residential purpose that subsequently converted to residential use on or after December 7, 1981 without the need for a building permit shall be eligible to convert from their prior rate schedule to an existing applicable domestic service submetering rate schedule. Any non-residential building converted to residential use, for which a building permit was required on or after July 1, 1982, must be separately metered by SCE.

C. Other Uses or Premises. A customer shall not use electricity received from SCE upon other Premises, except for SCE's operating convenience, nor for other purposes than those specified in the customer's application or in the rate schedule applied.

D. Customer with Multiple Service Accounts/Meters at a Single Premises. When a customer (single enterprise) occupies a single Premises with multiple service accounts/meters, the readings of such meters shall not be combined for billing purposes except as provided for in Rule 9.B. However, if the customer physically aggregates the electric loads of such multiple service accounts/meters into a single service account (master-meter), the account will be provided service under an applicable rate schedule.

E. Use by Others. A customer shall not charge for electricity received from SCE and used by another person, except:

1. Where energy is purchased at rates specifically applicable to resale service; or
2. Where the charge to domestic or nondomestic tenants is absorbed in the rental for the Premises or space occupied, is not separately identified, and does not vary with electrical usage. In such cases, where a customer subsequently converts to and receives service under an applicable submetering rate schedule, tenant rental charges shall be reduced for the duration of the lease to reflect removal of the energy related charges.
3. Where the customer is the owner, lessee, or operator of a multifamily accommodation and submeters electricity furnished for use by a domestic tenant in a single-family dwelling at the same rates that SCE would charge for the service if supplied directly and such customer's account is eligible for service under Schedule DMS-1 or DMS-2. In such cases, said owner, lessee, or operator shall furnish, install, maintain, and test the submeters. This electrical usage applies only to the single-family dwellings and excludes other electrical usage such as for swimming pools, recreation rooms, or laundry facilities which are used in common by tenants. In addition, said owner, lessee, or operator served under Schedule DMS-2 may elect to have SCE perform mobilehome park bill calculation services in accordance with the provisions contained within Schedule DMS-2 and Form 14-774, Bill Calculation Service Agreement.

(Continued)

(To be inserted by utility)  
Advice 2231-E-A  
Decision \_\_\_\_\_

Issued by  
Akbar Jazayeri  
Vice President

(To be inserted by Cal. PUC)  
Date Filed Jul 7, 2008  
Effective Jul 7, 2008  
Resolution E-4173



Rule 18  
SUPPLY TO SEPARATE PREMISES AND USE BY OTHERS

Sheet 2

(Continued)

E. Use by Others. (Continued)

4. As provided in Sections F and G below. (T)

All energy use, including use by others, supplied through a single SCE meter is the responsibility of the customer of record.

- F. Privately or Publicly Owned Boat Marinas. SCE will furnish electrical service to a master-meter customer at a privately or publicly owned boat marina or small craft harbor. The master-meter customer may submeter tenant usage aboard a vessel moored in an individual slip or berth at the marina or harbor but may not submeter any other tenant or any land-based facility.

If the master-meter marina customer submeters and furnishes electricity to an individual boat slip or berth for tenant usage aboard a vessel, the rates and charges to the user must not exceed those that would apply if the user were purchasing such electricity directly from SCE.

- G. Cold-Ironing Load. A master-metered customer may submeter a tenant's cold-ironing load aboard an ocean-going vessel at the Port of Long Beach or the Port of Hueneme but may not submeter any other load or land-based facility. (N)

If the master-metered customer submeters cold-ironing load to an ocean-going vessel, the rates and charges to the submetered user for services supplied by SCE must not exceed the rates and charges the master-metered customer is billed by SCE for such services.

Cold-ironing load is defined as the use of shore-supplied electricity for the lights, heating, cooling, machinery, and other needs of an ocean-going vessel while at berth or otherwise electrically connected, as replacement for the vessel's auxiliary internal combustion engines. (N)

- H. Resale of Electricity. Resale of electricity or submetering of electricity for the purpose of resale is prohibited, except as provided for under Section E.3, F, or G above. (T)

Violation of any provision of this Rule shall result in discontinuance of electricity, or refusal to provide service, in accordance with Rule 11.G. (T)

- I. Direct Access. When SCE delivers electric power purchased by an ESP to a master-metered Direct Access Customer, such Customer is subject to the provisions of Section E, F, or G above regarding SCE's charges for such delivery. (T)

(To be inserted by utility)  
 Advice 2231-E-A  
 Decision \_\_\_\_\_

Issued by  
Akbar Jazayeri  
Vice President

(To be inserted by Cal. PUC)  
 Date Filed Jul 7, 2008  
 Effective Jul 7, 2008  
 Resolution E-4173



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(To be inserted by utility)  
Advice 2231-E-A  
Decision \_\_\_\_\_

Issued by  
Akbar Jazayeri  
Vice President

(To be inserted by Cal. PUC)  
Date Filed Jul 7, 2008  
Effective Jul 7, 2008  
Resolution E-4173



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Sheet 8

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**RULES**

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| 11              | Discontinuance and Restoration of Service .....                              | 22964-22965-22966-22967-22968-E<br>22969-22970-22971-40768-E  |
| 12              | Rates and Optional Rates .....   | 40634-35618-E   |
| 13              | Temporary Service .....  | 24683-E   |
| 14              | Shortage of Supply and Interruption of Delivery .....                        | 22976-26339-E   |
| 15              | Distribution Line Extensions .....   | 24684-24685-24686-43167-27026-27027-27028-E<br>43168-28091-33598-33599-33600-33601-43169-43170-37283-33605-E  |
| 16              | Service Extensions .....   | 24700-24701-27143-24703-24704-24705-27144-E<br>24707-24708-24709-24710-24711-33962-33963-24714-24715-24716-24717-E  |
| 17              | Adjustment of Bills and Meter Tests .....                                    | 19616-19617-19618-19619-19620-E   |
| 18              | Supply to Separate Premises and Use by Others .....                          | 44118-44119-E (T)   |
| 20              | Replacement of Overhead With Underground Electric Facilities .....           | 31867-23019-23020-31868-26177-31869-E   |
| 21              | Generating Facility Interconnections .....                                   | 36865-36866-39415-36868-41287-41288-41289-E<br>41290-41291-41292-41293-41294-41295-41296-41297-41298-41299-41300-41301-E<br>41302-41303-41304-41305-41306-41307-41308-41309-41310-41311-41312-41313-E<br>41314-41315-41316-41317-41318-41319-41320-41321-41322-41323-41324-41325-E<br>41326-41327-41328-41329-41330-41331-41332-41333-E |
| 22              | Direct Access .....  | 40020-24285-24286-24287-31056-27752-31057-30002-30003-24293-E<br>24294-25943-25114-24297-25944-24299-25818-25819-25820-25821-25822-25823-E<br>24306-24307-25824-25825-24310-24311-24312-24313-31058-24315-24316-24317-E<br>24318-24319-24320-24852-24322-24853-24324-40021-24326-24327-24328-24329-E<br>24330-24331-24332-24333-E       |
| 22.1            | Switching Exemption Guidelines .....   | 40956-35620-40957-40958-40959-35624-E   |
| 22.2            | Direct Access Service for Qualified Nonprofit Charitable Organizations ..... | 41804-E   |
| 23              | Community Choice Aggregation .....   | 40024-40025-40026-40027-40028-40029-E<br>40030-40031-40032-40033-40034-40035-40036-40037-43670-40039-40040-40041-E<br>40042-40043-40044-40045-40046-40047-40048-40049-40050-40051-40052-40053-E<br>40054-40055-40056-40057-40058-40059-40060-40061-E  |
| 23.2            | Community Choice Aggregation Open Season .....                               | 40062-40063-43671-43672-E   |

(Continued)

(To be inserted by utility)  
 Advice 2231-E-A  
 Decision \_\_\_\_\_

Issued by  
Akbar Jazayeri  
Vice President

(To be inserted by Cal. PUC)  
 Date Filed Jul 7, 2008  
 Effective Jul 7, 2008  
 Resolution E-4173



An EDISON INTERNATIONAL Company

Lisa Vellanoweth  
Manager of Tariffs

July 10, 2008

California Public Utilities Commission  
505 Van Ness Avenue, Room 4005  
San Francisco, CA 94102

Attn: Honesto Gatchalian  
Energy Division

Re: Substitute Sheets for Advice 2231-E-A

Dear Mr. Gatchalian:

Enclosed are an original and four copies of Attachment A in pertinent part and Substitute Sheet Numbers 44118-E, 44119-E\*, and 44121-E\* for Advice 2231-E-A. This Substitute Sheet is necessary so that the various sections of Rule 18 properly reference Paragraph G as containing the ordered language to allow master-metered customers in SCE's service territory to submeter and bill a tenant vessel's cold-ironing load.

Please include the enclosed sheets in your master Advice 2231-E-A and distribute the copies to the appropriate people reviewing Advice 2231-E-A. If you have any questions, please contact Lisa Foulds at (626) 302-2010.

Sincerely,

Lisa Vellanoweth

Enclosures  
2231-EASub1.doc

cc: GO 96-B