

PUBLIC UTILITIES COMMISSION

SAN FRANCISCO, CA 94102-3298



July 29, 2009

Advice Letter 2350-E

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

**Subject: Revision of Rule 17 – Adjustment of Bills and Meter
Tests, Section D – Adjustment of Bills for Billing
Error, in Accordance with D.09-03-025**

Dear Mr. Jazayeri:

Advice Letter 2350-E is effective July 10, 2009.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director
Energy Division

June 10, 2009

ADVICE 2350-E
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Revision of Rule 17 - Adjustment of Bills and Meter Tests,
Section D - Adjustment of Bills for Billing Error, in Accordance
With Decision 09-03-025

In compliance with Decision (D.) 09-03-025,¹ Southern California Edison Company (SCE) hereby submits the following revisions to electric Rule 17 - Adjustment of Bills and Meter Tests, Section D - Adjustment of Bills for Billing Error (Rule 17-D). The revised tariff sheets are listed on Attachment A and are attached hereto.

PURPOSE

The purpose of this advice filing is to comply with Ordering Paragraph 15 of D.09-03-025 which states "SCE shall file an advice letter within 90 days to conform Rule 17-D to Resolution G-3372 and D.05-09-046 in a manner similar to other electric and gas utilities."

BACKGROUND

On November 19, 2007, SCE filed A.07-11-011 requesting, among other things, an increase in its base-related revenue requirements for the 2009 Test Year and 2010 and 2011 Post Test Years. On April 29, 2008, The Utility Reform Network (TURN) submitted testimony on Customer Service, Transmission and Distribution issues. Among the various issues raised by TURN's testimony was a discussion of California Public Utilities Commission (Commission) D.86-06-035, which ordered utilities to set a three-month limit on backbilling for undercharges to residential customers and a

¹ Final Decision in Application (A.)07-11-011 (Phase 1 of Southern California Edison Company's 2009 General Rate Case).

three-year limit for non-residential customers due to billing and meter errors.² The testimony further discussed clarification of billing errors provided by Resolution G-3372 and D.05-09-046 in which the Commission ordered Pacific Gas and Electric Company (PG&E) to insert tariff language governing billing errors in its Rules. The tariff language clarified that delayed bills and estimated bills due to errors of the utility were also “billing errors” and thus subject to the backbilling limits of three months for residential customers and three years for non-residential customers. TURN expressed concern that SCE’s Rule 17-D does not explicitly provide that delayed bills and estimated bills due to utility error are classified as “billing error” and thus subject to limits on backbilling. For purposes of clarity, TURN recommended that the Commission order SCE to conform its Rule 17 to recent Commission-adopted clarifications regarding billing errors, and suggested that SCE’s tariff should incorporate language similar to that of PG&E. TURN additionally stated that San Diego Gas & Electric Company (SDG&E) had also inserted language in its tariffs similar to PG&E’s tariff language (Advice Letter 1950-E-A and 1735-G-A).

In response to TURN’s testimony, SCE indicated that although its existing Rule 17 is consistent with Commission decisions and that the Rule is implemented as such, SCE was amenable to adding clarifying language to Rule 17 if directed to do so. In D.09-03-025, the Commission adopted TURN’s recommendation and ordered that the language on backbilling in SCE’s Rule 17 conform with the language in PG&E’s and other gas and electric utilities’ Rule 17 as adopted by Resolution G-3372 and D.05-09-046. Thus, SCE herein adopts the language proposed by TURN and submits changes in the tariffs attached hereto.³

PROPOSED TARIFF CHANGES

SCE’s proposed tariff amendments to Rule 17-D, as recommended by TURN, are:

A Billing Error is an error by SCE which results in incorrect billing charges to the customer. Billing Errors may include incorrect meter reads or clerical errors by an SCE representative such as applying the wrong rate, wrong billing factor, or an incorrect calculation. **Billing Error shall also include failure to deliver a bill, actual or estimated, in a timely manner in accordance with Rule 9.A.2.**

If estimated bills do not result from inaccessible roads, the customer, the customer’s agent, other occupant, animal or physical condition of the property preventing access to SCE’s facilities on the customer’s Premises, other causes within control of the customer, or a natural or man-made

² Testimony of Gayatri M. Schilberg on Customer Service, Transmission and Distribution Issues, page 13.

³ In Resolution G-3372, the Commission directed PG&E to provide a reason code on the customer bill in cases where the bill was estimated. This requirement does not involve backbilling per Rule 17 and PG&E’s Rule 17 does not include any language on providing a reason code for estimated bills. Thus, SCE’s clarification of its Rule 17 backbilling language does not include a provision for providing an estimated bill reason code.

disaster such as a fire, earthquake, flood, or severe storms, the issuance of estimated bills shall be considered "Billing Error" for the purpose below.

Billing Error does not include a Meter Error or Unauthorized Use, nor any error in billing resulting from meter dial over caused by other than SCE; switched or mismarked meters by other than SCE; improper customer wiring; blown fuse in one energized conductor; inaccessible meter; failure of the customer to notify SCE of changes in the customer's equipment or operation; or failure of the customer to take advantage of a rate or condition of service for which the customer is eligible; **or failure to issue a bill in accordance with Rule 9.A.2. due to a natural or man-made disaster such as fire, earthquake, flood, or severe storms.**

No cost information is required for this advice filing.

This advice filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

TIER DESIGNATION

Pursuant to D.07-01-024, Energy Industry Rule 5.2, this advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

This advice filing will become effective on July 10, 2009, the 30th calendar day after the date filed.

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 and 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

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) 929-5540
E-mail: 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 and A.07-11-011 service lists. Address change requests to the GO 96-B service lists should be directed by electronic mail to 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.

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 Lisa Vellanoweth at (626) 302-2021 or by electronic mail at Lisa.Vellanoweth@sce.com.

Southern California Edison Company

Akbar Jazayeri

AJ:lv: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

E-mail Disposition Notice to: 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) #: 2350-E

Tier Designation: 2

Subject of AL: Revision of Rule 17 - Adjustment of Bills and Meter Tests, Section D - Adjustment of Bills for Billing Error, in Accordance With Decision 09-03-025

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

AL filing type: Monthly Quarterly Annual One-Time Other

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

D.09-03-025

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 AL¹: _____

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: 7/10/09

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 17 and Table of Contents

Service affected and changes proposed¹: _____

Pending advice letters that revise the same tariff sheets: _____

¹ 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 and mas@cpuc.ca.gov

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

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) 929-5540
E-mail: Karyn.Gansecki@sce.com

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
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Revised 45366-E*	Table of Contents	Revised 45349-E
Revised 45367-E*	Table of Contents	Revised 45106-E

Rule 17
ADJUSTMENT OF BILLS AND METER TESTS

Sheet 3

(Continued)

D. Adjustment of Bills for Billing Error.

A Billing Error is an error by SCE which results in incorrect billing charges to the customer. Billing Errors may include incorrect meter reads or clerical errors by an SCE representative such as applying the wrong rate, wrong billing factor, or an incorrect calculation. Billing Error shall also include failure to deliver a bill, actual or estimated, in a timely manner in accordance with Rule 9.A.2. (T)

If estimated bills do not result from inaccessible roads, the customer, the customer's agent, other occupant, animal or physical condition of the property preventing access to SCE's facilities on the customer's Premises, other causes within control of the customer, or a natural or man-made disaster such as a fire, earthquake, flood, or severe storms, the issuance of estimated bills shall be considered "Billing Error" for the purpose below. (T)

Billing Error does not include a Meter Error or Unauthorized Use, nor any error in billing resulting from meter dial over caused by other than SCE; switched or mismarked meters by other than SCE; improper customer wiring; blown fuse in one energized conductor; inaccessible meter; failure of the customer to notify SCE of changes in the customer's equipment or operation; or failure of the customer to take advantage of a rate or condition of service for which the customer is eligible; or failure to issue a bill in accordance with Rule 9.A.2. due to a natural or man-made disaster such as fire, earthquake, flood, or severe storms. (T)

Where SCE overcharges or undercharges a customer as the result of a Billing Error, SCE may render an adjusted bill for the amount of the undercharge, and shall issue a refund or credit to the customer for the amount of the overcharge for the period of the Billing Error, but not exceeding three years in the case of an overcharge, and, in the case of an undercharge, not exceeding three months for residential service to a SCE-metered Single-Family Dwelling or Accommodation as defined in Rule 1, Definitions, and three years for all other service. (T)

E. Adjustment of Bills for Unauthorized Use.

Unauthorized Use is the use of energy in noncompliance with SCE's tariffs or applicable law. It includes, but is not limited to, meter tampering, unauthorized connection or reconnection, theft, fraud, intentional or unintentional use of energy whereby SCE is denied full compensation for electric service provided.

Where SCE determines that there has been Unauthorized Use of electric service, SCE may bill the customer for SCE's estimate of such unauthorized use. However, such estimated bill shall indicate unauthorized use for the most recent three years and, separately, unauthorized use beyond the three-year period for collection as provided by law.

Nothing in this Rule shall be interpreted as limiting SCE's rights under any provisions of any applicable law.

(Continued)

(To be inserted by utility)

Advice 2350-E
Decision 09-03-025

Issued by
Akbar Jazayeri
Vice President

(To be inserted by Cal. PUC)

Date Filed Jun 10, 2009
Effective Jul 10, 2009
Resolution _____



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(To be inserted by utility)
 Advice 2350-E
 Decision 09-03-025

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Vice President

(To be inserted by Cal. PUC)
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(To be inserted by utility)

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