Application No.: R.12-06-013
Exhibit No.: SCE-130
Witnesses: B. Anderson
R. Garwacki
J. Lim
A. Ramirez
C. Sorooshian

SOUTHERN CALIFORNIA EDISON®

An *EDISON INTERNATIONAL®* Company

(U 338-E)

Project Timeline Testimony of Southern California Edison Company

Before the

Public Utilities Commission of the State of California

Rosemead, California
December 5, 2014

SCE-130: Project Timeline Testimony

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I.

INTRODUCTION

On November 19, 2014, assigned Administrative Law Judge (ALJ) Jeanne McKinney directed Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E) and San Diego Gas and Electric Company (SDG&E) (jointly, investor-owned utilities, or IOUs) to serve supplemental testimony regarding timelines for specific, defined "Projects" related to proposals made in Rulemaking (R.) 12-06-013. As indicated in ALJ McKinney's ruling, the IOUs are required to show Gantt charts and/or PERT network diagrams for each of the following Projects, including activities and events necessary for project completion, the sequence of events (including predecessor events) for each, and the critical paths:

Projects:

Project 1: A bill comparison using customers' actual interval usage data;[1]
Project 2: A change to the Project 1 bill comparison to reflect a change in rate design;
Project 3: Current rate design proposal;
Project 4: Opt-in TOU (pilot or optional rate, as applicable);
Project 5: Default TOU pilot; and
Project 6: Default TOU.

The November 19 ruling indicates that this supplemental testimony "is intended to reflect some of the possible outcomes of this proceeding, but it should not be interpreted to prejudge the outcome."

[1] On the record of the November 22, 2014 evidentiary hearings, in Volume 22 of the transcript starting at page 3278, ALJ McKinney clarified that for Project 1, the IOUs are to provide estimates for the availability of bill comparison tools independent of the legal requirement in Public Utilities Code Section 745(c)(5) to provide "a summary of available tariff options with a calculation of expected annual bill impacts under each available tariff" before default TOU can be authorized or ordered by the Commission for residential customers.

II.

DISCUSSION

In the following sections, SCE provides a table for each Project that describes its required sub-activities (called "Task IDs"), the forecast timelines to implement the Project based on certain specified assumptions, and internal cross-references under columns labeled "Dependent Upon" and "Critical Path For" for the sub-activities under "Task ID."[2] The Project tables also show the name of the witness sponsoring the timeline testimony. Appendix A offers an overview/simplified Gantt chart in landscape view for ease of reading, together with Project-By-Project stand-alone Gantt charts.[3]

The forecasts for each Project will necessarily be adjusted based on outcomes in this proceeding, operational considerations, and other factors. For example, a key consideration when implementing rate changes is how best to consolidate several rate changes to avoid customer confusion or multiple bill pro rata changes.

A. Project 1: Bill Comparison Using Customers' Actual Interval Usage Data

For this project, SCE anticipates using customers' actual interval data to produce month-by-month and annual bill projections under different tariff options. Currently, SCE has the capability to internally develop customer-specific bill comparisons, but it does not have a customer-facing tool that permits customers to undertake that analysis on their own.

In support of SCE's proposed opt-in, untiered TOU rate proposal—Schedule TOU-D, which is currently the subject of an uncontested settlement pending Commission approval in A.13-12-015—SCE began in September 2014 to conduct TOU bill analyses for a limited number of residential customers on an *ad hoc* basis. SCE plans to undertake similar analyses (for SCE's internal use) to identify neutral and benefiting customers for purposes of marketing Schedule TOU-D rates, and for the TOU campaign

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[2] SCE provides high-level activities lists, which do not include the full details of all activities within each major activity. Additional planning for each activity is expected to occur at the outset of each project.

[3] Dates seens in charts are inclusive of the "Start Date," and exclusive of the "End Date." For example, a start date in May 2017 and an end date in November 2017 is six months of time beginning in May and continuing through October.

efforts that will launch in first quarter of 2015. This process will continue unless and until it is supplanted by a more robust capability that also includes a customer-facing tool that would be designed to produce bill comparisons for all eligible residential customers in connection with any Commission order to default residential customers to TOU rates.

Beginning in May 2017, SCE could also use its current bill comparison approach to address a representative customer sample for a default TOU pilot program that is assumed to launch in the first quarter of 2018 (see Projects 4 and 5 for further details).

Should the Commission ultimately order default TOU rates, pursuant to California Public Utilities Code Section 745(c)(5), a summary of available options and expected bill impacts must be communicated to customers no less frequently than once per year. SCE estimates that it would need approximately 18 months to build systems necessary to create the bill comparison tool for all residential customers. That system would include an on-line tool (likely linked to My Account on www.sce.com) permitting customers to compare their current rate plan to other available rate options, and to submit a request to switch plans. The rate analysis results would also be provided via other channels depending on the determined need, feasibility and benefit to customers. Because SCE does not have funding for this tool, it would also need to seek authorization from the Commission for cost recovery to develop the tool. SCE requests the Commission to consider whether that authorization should be obtained via a separate application, or whether authorization to establish a memorandum account through a Phase 1 Decision in this proceeding is warranted in order to begin this work.

Table II-1
Project 1

Task ID	Description	Duration (Mo)	Start Date	End Date	Dependent Upon:	Critical Path For:	Witness
1	Project 1: Bill comparison using customer's actual interval usage data		September 2014	Continuous			Sorooshian
1.1	Ad-hoc analysis by Load Research Department for optional TOU campaign		September 2014	Continuous		4.4	Sorooshian
1.2	Analysis, development of presentment of 12 months of historical data for Default TOU Pilot participants	6	May 2017	November 2017		5.7.1; 5.7.2	Sorooshian
1.3	Customer Facing Tool - IT- Systems (Requirements, Design, Build, Test, Launch)	18	June 2015	January 2017	4.3	2	Anderson

B. Project 2: Change to the Project 1 Bill Comparison To Reflect Changes In Rate Design

Project 2 assumes that the web-based customer self-service tool has been developed and implemented as described in Project 1 above. After such initial implementation, routine updates will be needed to support anticipated rate factor/structure changes. Generally, customer-facing system updates to bill presentments (whether on customer bills or online) take 9 to 12 months to reflect structural changes such as a change in the number of tiers or TOU time periods. However, if the changes are simple rate factor or price changes only (such as, for example, changing the price per kilowatt hour for a particular tier), that requires only 1 month of lead time. This system consideration speaks directly to the need for the rate transition plan to be specific and not necessarily dependent on interim, as yet unknown, revenue requirement changes over time.

Table II-2
Project 2

Task ID	Description	Duration (Mo)	Start Date	End Date	Dependent Upon:	Critical Path For:	Witness
2	Project 2: (Assuming customer facing tool only) A change to the Project 1 bill comparison to reflect a change in rate design		January 2017	Continuous			Anderson
2.1	Rate Changes only (30 days prior to effective date)		January 2017	Continuous	1.3; 3.3; 3.5		Anderson
2.2	Structure Changes (9-12 months prior to effective date)		January 2017	Continuous	1.3; 3.4		Anderson

C. Project 3: Implementation of Current Rate Design Proposal

Project 3 assumes Commission approval of SCE's proposed tiered rate changes for 2015 through 2018. Those proposed changes include tier collapsing, tiered rate and fixed charge price adjustments, baseline allocation changes, and income-qualified program pricing changes.

Based on a final decision in the Spring of 2015, SCE provides the following timelines for regulatory activities, systems changes, education and outreach activities to communicate changes to impacted customers, as well as operational readiness activities to ensure that SCE's personnel is prepared to respond to customer inquiries and requests.

Table II-3
Project 3

Task ID	Description	Duration (Mo)	Start Date	End Date	Dependent Upon:	Critical Path For:	Witness
3	PROJECT 3: Current rate design proposal		December 2014	Continuous			
3.1	CPUC Decision on RROIR Phase 1	< 1	May 2015	May 2015		3.2 - 3.5; 4.3, 5.1	
3.2	**Implement RROIR Phase 1 (Step 1 of 4: 3 tier, 1/1.5/2, $5 FC,CARE/FERA calc)**	12	January 2015	January 2016	3.1	3.3	
3.2.1	File Tier 1 Advice Letter for June Changes	< 1	May 2015	May 2015	3.1		Garwacki
3.2.2	IT- Systems/Billing						
3.2.2.1	Requirements, Design, Build, Test, Launch - Factor Changes Only (Est. 1 month)	1	May 2015	June 2015			Anderson
3.2.2.2	Requirements, Design, Build, Test, Launch - Factor and Structure Changes for Bill Presentment(Est. 9-12 months)	12	January 2015	January 2016			
3.2.3	Marketing - Planning, Execution, Evaluation						
3.2.3.1	Planning - Rate Analysis/Strategy and Creative Development	5	January 2015	June 2015			Lim
3.2.3.2	Execution - General Awareness and Targeted Outreach	2	May 2015	July 2015			Lim
3.2.3.3	Evaluation	2	June 2015	August 2015			Lim
3.2.4	Operational Readiness	10	March 2015	January 2016			Anderson
3.3	**Implement RROIR Phase 1 (Step 2 of 4: 3 tier, 1/1.3/1.6, $7.50 FC/ 50% Baseline Allocation)**	17	August 2015	January 2017	3.2	3.4	
3.3.1	File Tier 1 Advice Letter for Q1 Changes	< 1	December 2015	December 2015	3.1		Garwacki
3.3.2	IT- Systems/Billing						
3.3.2.1	Requirements, Design, Build, Test, Launch) - Factor Changes Only (Est. 1 month)	1	December 2015	January 2016			Anderson
3.3.3	Marketing - Planning, Execution, Evaluation						
3.3.3.1	Planning - Rate Analysis/Strategy and Creative Development	5	August 2015	January 2016			Lim
3.3.3.2	Execution - General Awareness and Targeted Outreach	2	December 2015	February 2016			Lim
3.3.3.3	Evaluation	2	January 2016	March 2016			Lim
3.3.4	Operational Readiness	14	November 2015	January 2017			Anderson
3.4	**Implement RROIR Phase 1 (Step 3 of 4: 2 tier, 1/1.3, $10 FC)**	24	January 2016	January 2018	3.3	3.5	
3.4.1	File Tier 1 Advice Letter for Q1 Changes	< 1	December 2016	December 2016	3.1		Garwacki
3.4.2	IT- Systems/Billing						
3.4.2.1	Requirements, Design, Build, Test, Launch - Factor Changes Only (Est. 1 month)	1	December 2016	January 2017			Anderson
3.4.2.2	Requirements, Design, Build, Test, Launch - Factor and Structure Changes for Bill Presentment(Est. 9-12 months)	12	January 2016	January 2017			Anderson
3.4.3	Marketing - Planning, Execution, Evaluation						
3.4.3.1	Planning - Rate Analysis/Strategy and Creative Development	5	August 2016	January 2017			Lim
3.4.3.2	Execution - General Awareness and Targeted Outreach	2	December 2016	February 2017			Lim
3.4.3.3	Evaluation	2	January 2017	March 2017			Lim
3.4.4	Operational Readiness	14	November 2016	January 2018			Anderson
3.5	**Implement RROIR Phase 1 (Step 4 of 4: 2 tier, 1/1.2, $10+ CC)**		August 2017	Continuous	3.4		
3.5.1	File Tier 1 Advice Letter for Q1 Changes	< 1	December 2017	December 2017	3.1		Garwacki
3.5.2	IT- Systems/Billing						
3.5.2.1	Requirements, Design, Build, Test, Launch) - Factor Changes Only (Est. 1 month)	1	December 2017	January 2018			Anderson
3.5.3	Marketing - Planning, Execution, Evaluation						
3.5.3.1	Planning - Rate Analysis/Strategy and Creative Development	5	August 2017	January 2018			Lim
3.5.3.2	Execution - General Awareness and Targeted Outreach	2	December 2017	February 2018			Lim
3.5.3.3	Evaluation	2	January 2018	March 2018			Lim
3.5.4	Operational Readiness		November 2017	Continuous			Anderson

Beginning in 2015, following issuance of a Phase 1 decision, SCE will file a Tier 1 advice letter to implement rate level and rate structure changes, which for this component of Project 3 assumes implementation effective June 2015. For subsequent structural rate changes authorized by the Phase 1

decision, SCE plans to implement those authorized structural rate changes in January 2016, 2017, and 2018, with any interim rate level changes made subject to a pro-rata type formula similar to that adopted in SCE's GRC Phase 2. Accordingly, SCE would file an advice letter containing those changes in the December prior to the planned implementation.

From a systems perspective, lead time is required for SCE to modify its back-office billing system and other systems, such as SCE's website, to implement the annual changes. These system changes would go through a standard development cycle, which includes activities such as requirements collection, designing, building, testing and launching. When the changes are relatively minor, such as price changes only, then revised rates typically can be implemented within 30 days. Thus, the 30-day timeframe is assumed for rate changes implemented in 2016 and 2018. However, for more extensive changes, such as tier-collapsing, a longer timeframe (estimated to be 9 to 12 months) is typically required. Accordingly, this longer timeframe is assumed for the 2017 rate changes.[4]

From a marketing perspective, SCE will first estimate the level of customer bill impacts.[5] Based on these estimated impacts, SCE will plan and execute a marketing campaign that leverages both general awareness and targeted outreach tactics. General awareness would include tactics such as bill messaging, content on SCE's website, and mass media. Targeted outreach tactics such as direct mail or e-mail would be used to reach customers who are projected to be highly impacted by the rate changes. These education and outreach campaigns would be implemented approximately one month prior to making the rate changes and would typically require approximately 5 months lead time.[6]

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[4] For the 2015 rate changes, SCE will have two systems implementations to enable the changes. The pricing changes will be effective in June 2015. Actual structural changes, including customer bill presentment, are expected to be effective in December 2015.

[5] SCE would expect to follow an approach of notifying specific customers of their anticipated bill impacts, similar to the process that was used for the summer 2014 rate changes.

[6] SCE notes that, as a result of the Phase 2 settlement provisions authorized in this proceeding, the maximum tiered rate differentials are expected to be roughly equivalent to that proposed by SCE for 2015 (at approximately 2.0 to 1), minimizing bill impacts for this first step of the transition.

From an operational readiness perspective, it is critical to develop and implement a plan to ensure that all customer-facing personnel are trained and have the appropriate tools to handle customer inquiries and requests. SCE's Customer Contact Center representatives will receive annual training aligned with the timing of SCE's marketing campaign. Additionally, field personnel who have contacts with customers will have informational cards to be handed out to customers, which will provide an overview of the rate changes and how customers can receive additional information. Finally, collateral material, including in-language collateral, will be made available to SCE's Local Public Affairs representatives as well as Community Based Organizations and Faith-Based Organizations in our service territory so they can have resources to provide their clients.

Once the rate changes are implemented, SCE will conduct evaluations of education and outreach campaigns and, as deemed necessary based on customer feedback, improve its website and other channels. These evaluations may include customer surveys as well as assessments of customer call and website volumes. Additionally, SCE would assess opportunities to modify customer-facing processes as needed to appropriately respond to customer needs.

D. Project 4: Optional TOU Rate Implementation

Table II-4
Project 4

Task ID	Description	Duration (Mo)	Start Date	End Date	Dependent Upon:	Critical Path For:	Witness
4	PROJECT 4: Opt-In TOU (Implementation of Optional TOU Rates)		March 2014	Continuous			
4.1	CPUC Final Decision in 2013 RDW (A.13-12-015)	< 1	December 2014	December 2014		4.2 - 4.4	
4.1.1	File Tier 1 Advice Letter to Implement Rates in Q1 2015	< 1	December 2014	December 2014			Garwacki
4.2	IT- Systems/Billing (Requirements, Design, Build, Test, Launch) - Factor and Structure Changes (Est. 9-12 months)	10	March 2014	January 2015	4.1		Anderson
4.3	File for Memo Account To Record Costs Related to Opt-In Program Beyond Q1 2015	< 1	June 2015	June 2015	3.1; 4.1	1.3	Anderson
4.4	Marketing - Planning, Execution, Evaluation & Operational Readiness	12	October 2014	October 2015			Lim
4.4.1	**2015 Q1 Campaign**	12	October 2014	October 2015	4.1		
4.4.1.1	Planning - Rate Analysis/Strategy and Creative Development	3	October 2014	January 2015	1.1		Lim
4.4.1.2	General Awareness and Targeted Outreach + Summer Aftercare	6	January 2015	July 2015			Lim
4.4.1.3	Evaluation of Campaign and Customer Behavior	7	March 2015	October 2015			Sorooshian
4.4.2	**2015 Q4 to Q1 2016 Campaign:**	15	July 2015	October 2016	4.1		
4.4.2.1	Planning - Rate Analysis/Strategy and Creative Development	3	July 2015	October 2015	1.1		Lim
4.4.2.2	General Awareness and Targeted Outreach	5	October 2015	March 2016			Lim
4.4.2.3	Summer Aftercare	4	May 2016	September 2016			Lim
4.4.2.4	Evaluation of Campaign and Customer Behavior	7	March 2016	October 2016			Sorooshian
4.4.3	**2016 Q4 to Q1 2017 Campaign:**	15	July 2016	October 2017	4.1		
4.4.3.1	Planning - Rate Analysis/Strategy and Creative Development	3	July 2016	October 2016	1.1		Lim
4.4.3.2	General Awareness and Targeted Outreach	5	October 2016	March 2017			Lim
4.4.3.3	Summer Aftercare	4	May 2017	September 2017			Lim
4.4.3.4	Evaluation of Campaign and Customer Behavior	7	March 2017	October 2017			Sorooshian
4.4.4	**2017 Q4 to Q1 2018 Campaign**		July 2017	Continuous	4.1		
4.4.4.1	Planning - Rate Analysis/Strategy and Creative Development	3	July 2017	October 2017	1.1		Lim
4.4.4.2	General Awareness and Targeted Outreach	5	October 2017	March 2018			Lim
4.4.4.3	Summer Aftercare	4	May 2018	September 2018			Lim
4.4.4.4	Evaluation of Campaign and Customer Behavior	7	March 2018	October 2018			Sorooshian
4.4.5	Operational Readiness		November 2014	Continuous			Anderson

Assuming the Commission adopts the settlement agreement for SCE's tiered and untiered TOU rate structures (see A.13-12-015), SCE could file an advice letter to make the rates effective as soon as January 2015. Lead time was required for SCE to modify its back-office billing and other systems. Thus, the systems activities for these new TOU rate offerings were initiated in March 2014 and are on schedule to be implemented as soon as January 2015.

In the first quarter of 2015, there will be two primary focuses for marketing, education and outreach. First, coinciding with the closure of the Tiered Electric Vehicle Rate (TEV), SCE will notify our current TEV customers of their transition to one of the new TOU options based on rate analysis of the most beneficial option for the customer. Second, SCE will conduct a limited launch of the new offerings with a targeted group of customers that would either benefit by or be neutrally impacted by the

new TOU-D rate options. Planning for this limited launch began in October 2014 and acquisition efforts are expected to begin in January 2015. Once customers enroll in TOU, after-care education efforts will continue into the summer season. These efforts are designed to help residential customers who are new to TOU rates manage their bills during summer months. SCE anticipates that this limited launch will provide valuable information about optimal acquisition strategies, which will be used to inform the subsequent, larger-scale marketing efforts.

After the limited TOU launch in Q1 of 2015, SCE anticipates that it will focus its on-going marketing efforts for TOU in the first and fourth quarters of each year. Based on SCE's experience with its current optional TOU rate, customer experience and attrition issues can arise when customers enroll on TOU immediately before or during the summer season. Focusing enrollments efforts in the first and fourth quarters of each year will allow sufficient time for SCE to educate customers about their new rate option prior to the summer season when on-peak pricing is in effect. Each year, SCE plans to evaluate and improve its methodologies and customer targeting as well as its "after-care" tactics. SCE also plans to regularly conduct internal evaluations of customer acceptance and any behavior modifications resulting from the new rate options.

Operational readiness is also a critical component to ensure the success of Project 4. Accordingly, SCE will develop and implement a plan to ensure that customer-facing personnel are trained and have the appropriate tools to handle customer inquiries and requests. For SCE's Customer Contact Center, representatives will receive training on an annual basis aligned with when the marketing campaign is implemented.

Given the limited scope of the Q1 2015 campaign, SCE has identified available funding to support the limited launch. However, SCE anticipates requesting cost recovery for the planning and execution of subsequent larger-scale optional TOU campaigns that are scheduled to begin in mid- to late 2015. An initial step for incremental cost recovery is an order for the establishment of a memorandum account, which could be included in a Phase 1 Decision.

E. Project 5: Default TOU pilot

Table II-5
Project 5

Task ID	Description	Duration (Mo)	Start Date	End Date	Dependent Upon:	Critical Path For:	Witness
5	PROJECT 5: Default TOU Pilot	59	May 2015	April 2020			
5.1	CPUC Decision on RROIR Phase 1 - Ordering Default TOU Pilot (and adopting collaboration and reporting guidelines)	< 1	May 2015	May 2015	3.1	5.2 - 5.9	
5.2	Collaboration of stakeholders on pilot elements and implementation details	13	June 2015	July 2016	5.1		Ramirez
5.3	Workshops to discuss pilot elements and implementation details	< 1	June 2016	June 2016	5.1	5.4	Ramirez
5.4	IT- Systems (Requirements, Design, Build, Test, Launch): Assuming general consensus on implementation details	18	July 2016	January 2018	5.1; 5.3	5.9	Anderson
5.5	Prepare and file Default TOU Pilot proposal (Tier 3 Advice Letter) including cost recovery mechanism	5	June 2016	November 2016	5.1	5.6	Ramirez/Anderson
5.6	Default TOU Pilot Resolution	< 1	March 2017	March 2017	5.5	5.7 - 5.9	
5.7	Refine execution plan for pilot	1	March 2017	April 2017	1.2; 5.6		Ramirez
5.7.1	Identify a representative sample, control groups for pilot.	1	May 2017	June 2017	1.2	5.9	Sorooshian
5.7.2	Conduct load research to estimate impacts based on 12-mo historical use	1	October 2017	October 2017	1.2	5.9	Sorooshian
5.8	Develop and test education and outreach collateral	3	June 2017	September 2017	5.7	5.9	Lim
5.9	Launch Pilot Program	24	January 2018	January 2020	5.1; 5.3 - 5.8	6.1	
5.9.1	Year 1 analysis and preliminary report	1	January 2019	February 2019	5.9	6.1.1	Sorooshian
5.9.2	Mid-Year adjustments	1	March 2019	April 2019			Lim
5.9.3	Workshop to Discuss Final Report Requirements	< 1	November 2019	November 2019			Ramirez
5.9.4	Year 2 (complete analysis)	3	January 2020	April 2020			Sorooshian
5.9.5	File final report including impacts on customers outlined in AB327 and SB1090	< 1	April 2020	April 2020	5.9.4	6.1.2; 6.2	Ramirez

Assuming the Commission directs SCE to conduct a default TOU pilot program, the earliest a default pilot TOU program can begin is January 2018. Given that assumption, SCE provides the following details, which align with the Joint Filed Exhibit 101 (JFE), which has not been moved into evidence, but that is subject to a pending motion to do so, filed on December 2).

SCE anticipates engaging in a collaborative process with stakeholders and Commission staff beginning June 2015, or 30 days after a Phase 1 Decision, to define the objectives and design of a default TOU pilot program. Per the JFE, SCE anticipates that this initial process will conclude no later than the end of June 2016 and will yield consensus on pilot design and implementation details such as the number of customers that will be included in the pilot program, the demographics and usage characteristics of the participating customers, the role of bill protection, the types of data that will be gathered through the pilot, estimated expenses, and the cost recovery mechanism(s). Following the conclusion of this collaborative process, SCE assumes it will prepare and file its request (via Tier 3

Advice Filing for a default TOU pilot program and associated cost recovery no later than November 2016.

SCE is estimating an 18-month lead time to allow for sufficient time to make the system changes needed to support the pilot. As such, SCE will plan to begin the systems development lifecycle activities in June 2016 and will target implementation on January 2018, giving due consideration to minimizing implementation complexity, incremental costs to ratepayers, system capabilities to support a pilot, and evaluating the role of bill protection in the TOU pilot program. Through the collaborative process and for a pilot program basis, bill protection functions may be provided through other rate alternatives such as average rate limiters.

The development of the pilot program will be refined once Commission approval is secured. SCE anticipates it could launch a default TOU pilot in early 2018, or approximately nine months following a Commission Resolution approving the Tier 3 Advice Letter. An early 2018 pilot program implementation date is preferable to later implementation. Because SCE does not believe it is prudent to enroll customers on TOU rates immediately preceding the start of the summer season, enrolling customers in early 2018 will allow sufficient time for SCE to educate customers about TOU rates prior to the typical higher kWh consumption during the summer season and the onset of higher on-peak pricing. These plans will be informed by the lessons learned from SCE's Opt-In TOU project (see Project 4).

SCE anticipates that the pilot will run for two years. SCE anticipates producing reports after the first and second year of the pilot, which would inform the Commission's evaluation of default TOU for all residential customers in a separate phase of R.12-06-013.

F. Project 6: Default TOU

Table II-6
Project 6

Task ID	Description	Duration (Mo)	Start Date	End Date	Dependent Upon:	Critical Path For:	Witness
6	PROJECT 6: Default TOU		January 2019	TBD			
6.1	Opening of Phase 3 of R.12-06-013 requesting default TOU pilot reports & establishing process to evaluate results and develop a record	< 1	January 2019	January 2019	5.9	6.2	Ramirez
6.1.1	CPUC workshops discussing initial pilot results	< 1	January 2019	January 2019	5.9.1		Ramirez
6.1.2	Parties file comments on final TOU pilot reports	< 1	July 2020	July 2020	5.9.5	6.2	Ramirez
6.2	CPUC to determine next steps		July 2020	TBD			Ramirez

With the interim information produced by the pilots by the beginning of 2019, SCE anticipates the Commission would open a separate phase of this proceeding to develop a record for considering default TOU for residential customers, including evaluating the impacts of default TOU rates on seniors, vulnerable customers and customers in hot inland areas. Results from the pilot can be completed and filed in early 2020, providing an opportunity for parties to file comments and the Commission to determine next steps in evaluating whether or not to begin to default all eligible customers to TOU rates.

Appendix A

Witness Qualifications

SOUTHERN CALIFORNIA EDISON COMPANY

QUALIFICATIONS AND PREPARED TESTIMONY

OF BRANDI M. ANDERSON

Q. Please state your name and business address for the record.

A. My name is Brandi Anderson, and my business address is 1515 Walnut Grove Avenue, Rosemead, California 91770.

Q. Briefly describe your present responsibilities at Southern California Edison Company ("SCE").

A. I am a Manager in the Customer Programs and Services division of SCE's Customer Service Business Unit. I am responsible for the design, development and implementation of customer programs and services.

Q. Briefly describe your educational and professional background.

A. I earned a Bachelor of Arts Degree from the University of California, San Diego and a Master of Business Administration Degree from the University of California, Los Angeles. I have worked at SCE for 20 years in a variety of leadership and project management positions in Consumer Affairs, Customers Service Operations, Customer Program Development, Transmission and Distribution, Business Planning, and Employee Training.

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony in this proceeding is to sponsor all portions denoted in the Table of Contents of, and table rows in, Exhibit SCE-126.

Q. Was this material prepared by you or under your supervision?

A. Yes, it was.

Q. Insofar as this material is factual in nature, do you believe it to be correct?

A. Yes, I do.

Q. Insofar as this material is in the nature of opinion or judgment, does it represent your best judgment?

A. Yes, it does.

1 Q. Does this conclude your qualifications and prepared testimony?

2 A. Yes it does.

SOUTHERN CALIFORNIA EDISON COMPANY

QUALIFICATIONS AND PREPARED TESTIMONY

OF CYRUS SOROOSHIAN

Q. Please state your name and business address for the record.

A. My name is Cyrus Sorooshian, and my business address is 2244 Walnut Grove Avenue, Rosemead, California 91770.

Q. Briefly describe your present responsibilities at the Southern California Edison Company.

A I am the Manager of Load Research in the Regulatory Policy and Affairs Department. My responsibilities include development, analysis, and reporting of load research studies in support of regulatory proceedings, pricing, forecasting, and load profiling for Direct Access.

Q. Briefly describe your educational and professional background?.

A. I have a Master's degree in Economics from University of Southern California (USC) where I also completed all coursework required for a Ph.D. in Economics, with special emphasis in Econometrics. As a research assistant at USC, I was involved in energy research projects and specifically in load research studies. I joined SCE in 1984, as an Environmental Statistician in the Research and Development Department. I began working in SCE's Load Research group in 1985 as a Load Research Analyst. In that capacity, I was involved in all aspects of load research including sample design and selection, data management, estimation of load profiles for various rate groups and customer classes, market segmentation, statistical estimation, and econometrics modeling. I was promoted to my current position in 1994.

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony in this proceeding is to sponsor all portions denoted in the Table of Contents of, and table rows in, Exhibit SCE-126.

Q. Was this material prepared by you or under your supervision?

A. Yes, it was.

Q. Insofar as this material is factual in nature, do you believe it to be correct?

A. Yes, I do.

Q. Insofar as this material is in the nature of opinion or judgment, does it represent your best judgment?

A. Yes it does.

Q. Does this conclude your qualifications and prepared testimony?

A. Yes, it does.

Appendix B

High-Level Gantt Chart

High-Level Gantt Chart For All Projects

		Year:	2014	2015				2016				2017				2018				2019				2020			
Project/Task	**Start Date**	**End Date**	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Proj. #1 Ad-hoc analysis by Load Research Optional TOU	September 2014	Continuous																	-->								
Proj. #1 Analysis, Development & Presentment of 12-mo Historical Data for Default TOU Pilot	May 2017	November 2017																									
Proj. #1 Customer Facing Tool - IT- Systems (Requirements, Design, Build, Test, Launch)	June 2015	January 2017																									
Proj. #2 Change to Proj. #1 (Rate Factor (Price) Change Only)	January 2015	Continuous																	-->								
Proj. #2 Change to Proj. #1 (New Rate Structures)	January 2015	Continuous																	-->								
Proj. #3 Implement RROIR Phase 1 (Step 1 - Summer 2015)	January 2015	January 2016																									
Proj. #3 Implement RROIR Phase 1 (Step 2 - 2016)	August 2015	January 2017																									
Proj. #3 Implement RROIR Phase 1 (Step 3 - 2017)	January 2016	January 2018																									
Proj. #3 Implement RROIR Phase 1 (Step 4 - 2018)	August 2017	Continuous																	-->								
Proj. #4 Opt-In TOU (Implement RDW Rates)	March 2014	Continuous																	-->								
Proj. #4 Opt-In TOU (2015 Q1 Campaign)	October 2014	October 2015																									
Proj. #4 Opt-In TOU (2015 Q4 to Q1 2016 Campaign)	July 2015	October 2016																									
Proj. #4 Opt-In TOU (2016 Q4 to Q1 2017 Campaign)	July 2016	October 2017																									
Proj. #4 Opt-In TOU (2017 Q4 Campaign)	July 2017	Continuous																	-->								
Proj. #5 Default TOU Pilot	May 2015	April 2020																									
Proj. #6 Default TOU	January 2019	TBD																							-->		

Appendix C

Gantt Chart for Project 1

Project 1

			Year:	2014	2015				2016				2017			
Task ID	Description	Start Date	End Date	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
1	Project 1: Bill comparison using customer's actual interval usage data	September 2014	Continuous	◘	◘	◘	◘	◘	◘	◘	◘	◘	◘	◘	◘	-->
1.1	Ad-hoc analysis by Load Research Department for optional TOU campaign	September 2014	Continuous													-->
1.2	Analysis, development of presentment of 12 months of historical data for Default TOU Pilot participants	May 2017	November 2017													
1.3	Customer Facing Tool - IT- Systems (Requirements, Design, Build, Test, Launch)	June 2015	January 2017													

Appendix D

Gantt Chart for Project 2

Project 2

			Year:	2014	2015				2016				2017			
Task ID	Description	Start Date	End Date	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
2	Project 2: (Assuming customer facing tool only) A change to the Project 1 bill comparison to reflect a change in rate design	January 2017	Continuous					◘	◘	◘	◘	◘	◘	◘	◘	-->
2.1	Rate Changes only (30 days prior to effective date)	January 2017	Continuous													-->
2.2	Structure Changes (9-12 months prior to effective date)	January 2017	Continuous													-->

Appendix E

Gantt Chart for Project 3

Project 3

Task ID	Description	Start Date	End Date
3	PROJECT 3: Current rate design proposal	December 2014	Continuous
3.1	CPUC Decision on RROIR Phase 1	May 2015	May 2015
3.2	Implement RROIR Phase 1 (Step 1 of 4: 3 tier, 1/1.5/2, $5 FC,CARE/FERA calc)	January 2015	January 2016
3.2.1	File Tier 1 Advice Letter for June Changes	May 2015	May 2015
3.2.2	IT- Systems/Billing		
3.2.2.1	Requirements, Design, Build, Test, Launch - Factor Changes Only (Est. 1 month)	May 2015	June 2015
3.2.2.2	Requirements, Design, Build, Test, Launch - Factor and Structure Changes for Bill Presentment(Est. 9-12 months)	January 2015	January 2016
3.2.3	Marketing - Planning, Execution, Evaluation		
3.2.3.1	Planning - Rate Analysis/Strategy and Creative Development	January 2015	June 2015
3.2.3.2	Execution - General Awareness and Targeted Outreach	May 2015	July 2015
3.2.3.3	Evaluation	June 2015	August 2015
3.2.4	Operational Readiness	March 2015	January 2016
3.3	Implement RROIR Phase 1 (Step 2 of 4: 3 tier, 1/1.3/1.6, $7.50 FC/ 50% Baseline Allocation)	August 2015	January 2017
3.3.1	File Tier 1 Advice Letter for Q1 Changes	December 2015	December 2015
3.3.2	IT- Systems/Billing		
3.3.2.1	Requirements, Design, Build, Test, Launch) - Factor Changes Only (Est. 1 month)	December 2015	January 2016
3.3.3	Marketing - Planning, Execution, Evaluation		
3.3.3.1	Planning - Rate Analysis/Strategy and Creative Development	August 2015	January 2016
3.3.3.2	Execution - General Awareness and Targeted Outreach	December 2015	February 2016
3.3.3.3	Evaluation	January 2016	March 2016
3.3.4	Operational Readiness	November 2015	January 2017

Project 3 – Continued

			Year:	2014	2015				2016				2017				2018			
Task ID	Description	Start Date	End Date	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
3.4	**Implement RROIR Phase 1 (Step 3 of 4: 2 tier, 1/1.3, $10 FC)**	January 2016	January 2018																	
3.4.1	File Tier 1 Advice Letter for Q1 Changes	December 2016	December 2016																	
3.4.2	IT- Systems/Billing																			
3.4.2.1	Requirements, Design, Build, Test, Launch - Factor Changes Only (Est. 1 month)	December 2016	January 2017																	
3.4.2.2	Requirements, Design, Build, Test, Launch - Factor and Structure Changes for Bill Presentment(Est. 9-12 months)	January 2016	January 2017																	
3.4.3	Marketing - Planning, Execution, Evaluation																			
3.4.3.1	Planning - Rate Analysis/Strategy and Creative Development	August 2016	January 2017																	
3.4.3.2	Execution - General Awareness and Targeted Outreach	December 2016	February 2017																	
3.4.3.3	Evaluation	January 2017	March 2017																	
3.4.4	Operational Readiness	November 2016	January 2018																	
3.5	**Implement RROIR Phase 1 (Step 4 of 4: 2 tier, 1/1.2, $10+ CC)**	August 2017	Continuous																	-->
3.5.1	File Tier 1 Advice Letter for Q1 Changes	December 2017	December 2017																	
3.5.2	IT- Systems/Billing																			
3.5.2.1	Requirements, Design, Build, Test, Launch) - Factor Changes Only (Est. 1 month)	December 2017	January 2018																	
3.5.3	Marketing - Planning, Execution, Evaluation																			
3.5.3.1	Planning - Rate Analysis/Strategy and Creative Development	August 2017	January 2018																	
3.5.3.2	Execution - General Awareness and Targeted Outreach	December 2017	February 2018																	
3.5.3.3	Evaluation	January 2018	March 2018																	
3.5.4	Operational Readiness	November 2017	Continuous																	-->

Appendix F

Gantt Chart for Project 4

Project 4

Task ID	Description	Start Date	End Date	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
			Year:	2014	2015				2016				2017				2018			
4	**PROJECT 4: Opt-In TOU (Implementation of Optional TOU Rates)**	March 2014	Continuous	<--	◘	◘	◘	◘	◘	◘	◘	◘	◘	◘	◘	◘	◘	◘	◘	-->
4.1	CPUC Final Decision in 2013 RDW (A.13-12-015)	December 2014	December 2014																	
4.1.1	File Tier 1 Advice Letter to Implement Rates in Q1 2015	December 2014	December 2014																	
4.2	IT- Systems/Billing (Requirements, Design, Build, Test, Launch) - Factor and Structure Changes (Est. 9-12 months)	March 2014	January 2015	<--																
4.3	File for Memo Account To Record Costs Related to Opt-In Program Beyond Q1 2015	June 2015	June 2015																	
4.4	Marketing - Planning, Execution, Evaluation & Operational Readiness	October 2014	October 2015																	
4.4.1	**2015 Q1 Campaign**	October 2014	October 2015	◘	◘	◘	◘													
4.4.1.1	Planning - Rate Analysis/Strategy and Creative Development	October 2014	January 2015																	
4.4.1.2	General Awareness and Targeted Outreach + Summer Aftercare	January 2015	July 2015																	
4.4.1.3	Evaluation of Campaign and Customer Behavior	March 2015	October 2015																	
4.4.2	**2015 Q4 to Q1 2016 Campaign:**	July 2015	October 2016				◘	◘	◘	◘	◘									
4.4.2.1	Planning - Rate Analysis/Strategy and Creative Development	July 2015	October 2015																	
4.4.2.2	General Awareness and Targeted Outreach	October 2015	March 2016																	
4.4.2.3	Summer Aftercare	May 2016	September 2016																	
4.4.2.4	Evaluation of Campaign and Customer Behavior	March 2016	October 2016																	
4.4.3	**2016 Q4 to Q1 2017 Campaign:**	July 2016	October 2017								◘	◘	◘	◘	◘					
4.4.3.1	Planning - Rate Analysis/Strategy and Creative Development	July 2016	October 2016																	
4.4.3.2	General Awareness and Targeted Outreach	October 2016	March 2017																	
4.4.3.3	Summer Aftercare	May 2017	September 2017																	
4.4.3.4	Evaluation of Campaign and Customer Behavior	March 2017	October 2017																	
4.4.4	**2017 Q4 to Q1 2018 Campaign**	July 2017	Continuous												◘	◘	◘	◘	-->	
4.4.4.1	Planning - Rate Analysis/Strategy and Creative Development	July 2017	October 2017																	
4.4.4.2	General Awareness and Targeted Outreach	October 2017	March 2018																	
4.4.4.3	Summer Aftercare	May 2018	September 2018																	
4.4.4.4	Evaluation of Campaign and Customer Behavior	March 2018	October 2018																	
4.4.5	Operational Readiness	November 2014	Continuous																-->	

Appendix G

Gantt Chart for Project 5

Project 5

Task ID	Description	Start Date	End Date
5	PROJECT 5: Default TOU Pilot	May 2015	April 2020
5.1	CPUC Decision on RROIR Phase 1 - Ordering Default TOU Pilot (and adopting collaboration and reporting guidelines)	May 2015	May 2015
5.2	Collaboration of stakeholders on pilot elements and implementation details	June 2015	July 2016
5.3	Workshops to discuss pilot elements and implementation details	June 2016	June 2016
5.4	IT- Systems (Requirements, Design, Build, Test, Launch): Assuming general consensus on implementation details	July 2016	January 2018
5.5	Prepare and file Default TOU Pilot proposal (Tier 3 Advice Letter) including cost recovery mechanism	June 2016	November 2016
5.6	Default TOU Pilot Resolution	March 2017	March 2017
5.7	Refine execution plan for pilot	March 2017	April 2017
5.7.1	Identify a representative sample, control groups for pilot.	May 2017	June 2017
5.7.2	Conduct load research to estimate impacts based on 12-mo historical use	October 2017	November 2017
5.8	Develop and test education and outreach collateral	June 2017	September 2017
5.9	Launch Pilot Program	January 2018	January 2020
5.9.1	Year 1 analysis and preliminary report	January 2019	February 2019
5.9.2	Mid-Year adjustments	March 2019	April 2019
5.9.3	Workshop to Discuss Final Report Requirements	November 2019	November 2019
5.9.4	Year 2 (complete analysis)	January 2020	April 2020
5.9.5	File final report including impacts on customers outlined in AB327 and SB1090	April 2020	April 2020

Appendix H

Gantt Chart for Project 6

Project 6

			Year:	2014	2015				2016				2017				2018				2019				2020			
Task ID	Description	Start Date	End Date	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
6	PROJECT 6: Default TOU	January 2019	TBD																		◘	◘	◘	◘	◘	◘	-->	
6.1	Opening of Phase 3 of R.12-06-013 requesting default TOU pilot reports & establishing process to evaluate results and develop a record	January 2019	January 2019																									
6.1.1	CPUC workshops discussing initial pilot results	January 2019	January 2019																									
6.1.2	Parties file comments on final TOU pilot reports	July 2020	July 2020																									
6.2	CPUC to determine next steps	July 2020	TBD																								-->	