

Here is what's happening with Southern California Edison.

In March 2008, SCE submitted to the California Public Utilities Commission Advice Letter 2225-E requesting to revise electric rates primarily related the utility's energy resource recovery costs. In the letter, SCE showed the increase for the average rate for traffic signals by almost 10% and for street lighting by 14.5%. Their percentage increases were the largest for any customer class. Moreover, the overall total system change was a decrease of -1.2%.

CAL-SLA, Los Angeles County, City of Hemet, and other cities submitted to the CPUC protests to the advice filing and Edison's request rate increase for traffic control signals and street lighting.

(CAL-SLA's and L.A. County's protests are attached to this e-mail.)

Edison filed a reply to protests, and we are right now in negotiations. The CPUC Energy Division will eventually draft a resolution that approves, revises, or denies the advice letter and will present it the Commission for their decision. We don't know when the Energy Division will prepare the draft resolution.

Edison has done bill impact analysis and has estimated the rate impact for street lighting to be a \$9.4 million increase, or 8.7% increase.

Edison has prepared PowerPoint presentations and handouts (which are attached) in response to our protest and presented this material to cities and counties.



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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DEAN D. EFSTATHIOU, Acting Director

ADDRESS ALL CORRESPONDENCE TO:
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ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: T-5

April 9, 2008

Mr. Sean Ceallagher
Director of Energy Division
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Attention Tariff Unit

Dear Mr. Ceallagher:

**PROTEST TO ADVICE LETTER 2225-E
FILED BY SOUTHERN CALIFORNIA EDISON
MARCH 24, 2008**

The County of Los Angeles Department of Public Works (Public Works) protests Advice Letter 2225-E of Southern California Edison (SCE) filed on March 24, 2008. Public Works pays for street lights and traffic controls within its jurisdiction.

Currently, the Cities and Counties throughout the State of California are undergoing a significant budgetary crisis. SCE is seeking a 14.5 percent rate increase for street lights and a 9.9 percent rate increase for traffic control signals while Public Works is undergoing these budgetary crises. This process is not one which is envisioned by the Public Utilities Code §454.

If the California Public Utilities Commission (CPUC) were to approve such a rate increase, it would have a substantial adverse impact on the financial conditions of the County Lighting Maintenance Districts and Assessment Zones serving the Unincorporated County area and 15 cities. The Lighting Districts are primarily funded through the Districts' share of the ad valorem property tax supplemented by assessment collected from benefited parcels within the Districts. In the near term, this tariff rate increase, coupled with the 20.5 percent tariff rate increase proposed as part of the 2009 Test Year General Rate Case would require an assessment rate increase in several of

Mr. Sean Ceallagher
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the Assessment Zones in order to meet increased operating costs. Of particular concern is the Assessment Zone serving the Unincorporated County area, where an assessment rate increase would require a Proposition 218 vote and approval by over 185,000 property owners. If there is a majority protest, a significant number of street lights would need to be turned off Countywide in order to reduce operating costs and stay within the limited financial resources of the District. A similar reduction in street lighting levels would need to occur in the cities served by the County-administered Lighting Districts.

Public Works agrees with the comments filed by its representative advocacy group the California City-County Street Light Association and will not repeat those comments here but incorporates them by reference. Section 454 of the Public Utilities Code requires that the CPUC reject any proposed rate increase unless there is an adequate evidentiary showing. Clearly, in this case an increase in street light and traffic control rates of such a magnitude would require a showing which is simply not present. We request that the CPUC reject the Advice Letter. In the alternative, the CPUC can have street light and traffic control signal rates decrease by -1.2 percent, the system average percent change for the other classes.

If you have any questions regarding this matter, please contact Ms. Guita Sheik of my staff at (626) 300-4708.

Very truly yours,

DEAN D. EFSTATHIOU
Acting Director of Public Works



WILLIAM J. WINTER
Assistant Deputy Director
Traffic and Lighting Division

GS:jh

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cc: Southern California Edison Company (Akbar Jazayeri, Bruce Foster)

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April 8, 2008

VIA EMAIL

(inj@cpuc.ca.gov and mas@cpuc.ca.gov)

Energy Division
California Public Utilities Commission
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Re: Protest to Advice Letter 2225-E filed by Southern California Edison on March 24, 2008

Dear Sir or Madam:

This office represents the California City-County Streetlight Association (“CAL-SLA”), an organization of all Cities and Counties within the State of California who pay for streetlighting and traffic control service from the three investor-owned utilities (“IOUs”). CAL-SLA has been active in representing the Cities and Counties throughout the State of California since 1981 in every general rate case that has been filed by one of the three IOUs. CAL-SLA, by this letter, is filing a Protest to Advice Letter 2225-E. In Advice Letter 2225-E, Southern California Edison (“SCE” or “Edison”) seeks to revise its tariff schedules in accordance with Decision (D.) 08-03-019 (2008 Energy Resource Recovery Account (“ERRA”) revenue requirement). In Table 3 of the Advice filing, Edison shows the overall System Average Percentage Change (SAPC) to be a rate decrease of -1.2%. However, for street lighting the percentage change is an increase of 14.5% and for traffic control signals (TC-1) is an increase of 9.9%. CAL-SLA protests the changes requested for streetlighting and traffic control signals.

I. THE ADVICE LETTER PROCEDURE IS THE WRONG PROCESS FOR REQUESTING A 14.5% RATE INCREASE IN STREETLIGHT RATES AND A 9.9% INCREASE IN TRAFFIC CONTROL SIGNAL RATES.

While CAL-SLA has been involved in cases of this nature for 27 years, it has never seen a situation where one of the three IOUs is using the streamlined advice-letter process for trying to obtain a 14.5% rate increase for streetlights and a 9.9% rate increase for traffic control signals. Such a procedure clearly violates Section 454 of the California Public Utilities Code. The process selected by SCE has already been determined by the California Court of Appeals to be violative of Section 454. Pacific Bell v. Public Utilities Commission, (2000) 79 Cal.App.4th 269. In that case, Pacific Bell tried to use the advice letter process to obtain a rate increase. In Pacific Bell, the Court of Appeal ruled that the Public Utilities Commission was correct in rejecting the advice letter process for a proposed increase.

It is amazing, given the clear ruling of this decision, that SCE chose to use the advice letter process. Public Resources Code § 454 abundantly makes clear the process for requesting such a rate increase. The streamlined process that SCE is attempting to employ here does not meet the significant due process requirements envisioned by Section 454. In the seminal case California Mutual Water Company Assoc. v. Public Utilities Commission of the State of California; Southern California Edison, (1955) 45 Cal. 2d 152 the Supreme Court ruled that in an absence of an evidentiary showing required by Section 454, the Public Utilities Commission is without power to authorize an increase in rates. Clearly, this Supreme Court decision would prevent a 14.5% rate increase for streetlights and a 9.9% increase in traffic control signals without the necessary evidentiary showing as is typical in a general rate case.

II. DECISION 08-03-019 DOES NOT AUTHORIZE SCE TO INCREASE RATES BY THE ADVICE LETTER PROCESS.

Decision 08-03-019 in Application 07-08-007 is silent in authorizing a rate increase of 14.5% for streetlights and 9.9% for traffic control signals. In Application A. 07-08-004, the utility's ERRA proceeding, Table I - 1 (page 2 of the application) shows a streetlight rate increase of 5.3%, which is less than the SAPC of 13.9%. Now, however, in their Advice Letter, without authorization from D 08-03-019, SCE is requesting in Table 3 a 14.5% increase for streetlighting, when the SAPC, is actually decreasing -1.2%. There is no evidentiary showing as to why streetlighting is the only customer class to receive a double digit rate increase. Actually, most of the rate classes are receiving decreases.

III. CAL-SLA DOES NOT HAVE THE EVIDENCE AND WORK PAPERS NECESSARY TO REVIEW THE PROPOSED ADVICE LETTER.

One of the problems with employing the advice letter process is that the normal discovery process available to an interested party in a general rate case does not exist. Normally, in a general rate CAL-SLA, like other interested parties, would have the availability of SCE's workpapers to review to see if such a rate increase is justified. Through the advice letter process, there is no procedure for this review. This is just another reason why the advice letter process should not be used for such a large increase to one particular customer group.

IV. THERE HAS NEVER BEEN A CHANGE OF STREETLIGHT FACILITY CHARGE RATES BETWEEN GENERAL RATE CASES.

In Appendix B to the Advice Letter 2225-E, at page 22 of 28, there is an increase of facilities charges, also known as "other charges", of 10.4%, for the various categories of streetlights. There has never been an increase in facilities charges in the interim period between general rate cases. The very nature of determining the facilities charge, requires the procedure of the general rate case where evidence is given and can be reviewed. It is the only method to determine if such a charge is reasonable which is required by Public Utilities Code § 454.

V. SCE REQUESTS AN SIGNIFICANT INCREASE IN ENERGY CHARGES IN THE ADVICE LETTER PROCESS

Beyond requesting charges that have never been requested before through an advice letter process, SCE requests an increase in the energy charge for streetlights of 39.3% Advice Letter Appendix B, page 22 of 28. Again, there is insufficient evidence for such an increase.

VI. THERE IS NO JUSTIFICATION FOR THE INCREASE IN TRAFFIC CONTROL SIGNALS

There is no evidence to support the calculation for the increase in traffic control signals. In Advice Letter Appendix B, page 24 of 28, traffic control signals would increase between 10.4 % and 13.8 %. In SCE's Advice Letter, there is an increase of 9.9%. It is unclear what the evidentiary basis is for this 9.9% increase. Again, the advice letter process does not provide CAL-SLA with an adequate review of the evidentiary showing by SCE.

For the reasons stated, CAL-SLA strongly recommends that the Advice Letter be denied. If SCE wants such a rate increase, this should be part of their general rate case that is ongoing at the present time, Application No. 08-03-002. Clearly, given the mandate of Public Utilities Code § 454, the advice letter process is inappropriate for such a significant rate increase. In lieu of denying the letter outright, the filing could be suspended while the Energy Division has the time to review this highly significant and highly unusual proposal. Another option is for the CPUC to authorize the SAPC change of -1.2% to the streetlight and traffic control classes.

Respectfully submitted,

McCRACKEN & BYERS LLP

DAVID J. BYERS, ESQ.
Attorneys for CAL-SLA

cc: Director, Energy Division
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(Via U.S. Mail)

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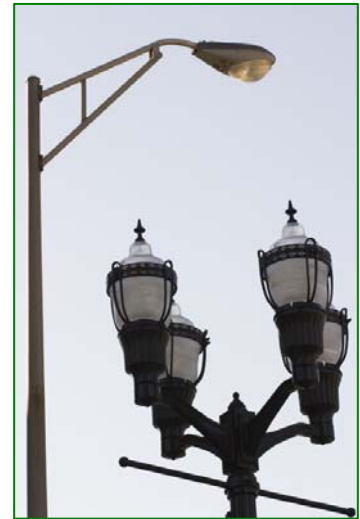
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Understanding Increases in Southern California Edison's Street Lighting Rate

Background

The California Public Utilities Commission on March 13, 2008, approved Southern California Edison's (SCE) 2008 revenue request covering the estimated cost of power plant fuel and wholesale purchased power for the utility's "bundled service" customers, those for whom the utility generates or procures power. The decision also addressed other issues related to customer rates, including implementation of the 2008 portion of SCE's current general rate case covering utility operations and maintenance costs.

The outcome was a relatively minor rate adjustment for all customers, effective April 7, 2008, with some rates dropping slightly while the rate charged one customer group – street lighting accounts – rose. The average rate charged street lighting accounts increased from 17.0 cents to 19.5 cents per kilowatt-hour.



Additionally, SCE has filed with the commission the utility's 2009 to 2011 General Rate Case forecasting the need for a utility revenue increase in 2009 of approximately 6.23 percent above today's rates, or \$726 million. In a rate case proceeding, utilities seek authorization to collect revenues for operations and maintenance expenses as well as capital expenditures – approximately 40 percent of the total revenues needed to serve customers. The remaining 60 percent – power plant fuel and purchased power costs – is reviewed in other regulatory proceedings. If approved as filed, SCE's 2009 to 2011 rate case would raise the average rate for street lighting from 19.5 cents to 23 cents per kilowatt-hour.

Following is an explanation of these current and projected changes in the rate SCE charges for street, area and traffic control lighting.

Why Rate Changes Can Differ Among Customer Groups

SCE customer rates are made up of two general components – the cost of generating electricity and the cost of delivering it to customers. Naturally, SCE incurs greater generation costs to serve higher-use customers, such as manufacturing facilities, than residential customers. This means that if utility generation costs increase that change has a greater impact on higher- than lower-use customers. Conversely, if power delivery costs increase, the impact is greater on lower-use customers.

Why Street Lighting Changes Are Higher

Power delivery costs are the largest component of SCE's current street & area lighting rate – approximately 67 percent. SCE currently is seeing significant cost increases in that component, whereas generation costs are slightly lower for 2008.

The distribution component of rates includes the cost of maintenance, the pole, the luminaire head, the lamp, labor costs, and other fixed costs such as taxes and franchise. A number of these costs have increased substantially during the past several years.

Customer Notification

SCE follows guidelines established by the Public Utilities Commission notifying customers of requested or actual rate changes. Local governments were notified by a mailing regarding the proposed 2009 rate case increases for street and traffic control lighting. The commission will hold a number of hearings during 2008 at which customer concerns will be heard.

Ownership of Street Lights

City and county representatives who wish to consider purchasing SCE's street lighting system within their jurisdiction can contact SCE for assistance in evaluating acquisition, operations and maintenance costs.



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SCE 2008 Rate Update

March 2008

1st Quarter 2008 Rate Actions

Three Rate Changes:

- Department of Water Resources (DWR) – January 1
 - 2007 Revenue Requirement
 - Bond Charge
- CWIP transmission related change associated with large transmission projects – March 1
- Consolidated Rate Change – April 7
 - ERRA
 - Primarily, fuel and purchased power
 - Various balancing accounts
 - 2006 GRC Proceeding
 - 2008 post test-year ratemaking (aka Attrition costs)
 - Other
 - CA Solar Initiative, Energy Efficiency, Nuclear Decommissioning, etc.
 - Elimination of Trust Transfer Amount (TTA)
 - Revenue reduction to offset upper tier residential rates

2008 DWR Rate Change

- Commission issued final decision on DWR's 2008 revenue requirement on December 20, 2007
- DWR Power Charge
 - Decrease due to decrease in 2008 DWR Revenue Requirement
 - Decrease mainly due to decrease in natural gas costs
- DWR Bond Charge
 - Slight increase
- January 1, 2008 Rate Change
 - DWR Power and Bond
 - Transmission - TOTCA

	2007 Rate (¢/kWh)	2008 Rate (¢/kWh)
DWR Charge		
Power Charge	9.49	8.875
Bond Charge	0.469	0.477

Impact to Customer Rates – April 7, 2008

- On average, bundled rates will decrease by 1.2% over 2007
 - Generation costs decreased by 2.4%
 - Delivery costs increased by 3.0%
- Average rates for most customer groups will decrease slightly
 - Increase in delivery costs was offset by decrease in generation costs
- Average rates for streetlight customers will increase
 - Mainly due to a 14.7% increase in distribution costs
 - Distribution costs makes up 61% of total rate
 - Preliminary analysis indicates that customers can expect to experience an average bill increase of approx 6-9%
 - Bill impact analyses at the service account level should be available by mid April
- Average rates for TC-1 customers will increase
 - Mainly due to a decrease in sales forecast for 2008
 - Customers with similar usage in 2007 and 2008 can expect to experience an average bill increase of approx 4%
 - Bill impact analyses at the service account level should be available by mid April

Bundled Service – Average Rate Levels (cents/kWh)

Southern California Edison Company

Estimated Average Rate Summary - March 2008

Rate Schedule By Customer Group	2007 Rate	April 7, 2008 Rate	Percent Change
Domestic	15.2	15.0	-1.3%
Lighting-SM Med Power			
GS-1	17.5	17.0	-2.6%
TC-1	13.3	14.6	9.9%
GS-2	14.5	14.5	0.2%
TOU-GS-3	13.8	13.3	-3.0%
Group Total	14.8	14.6	-1.3%
Large Power			
TOU-8-SEC	12.8	12.4	-2.9%
TOU-8-PRI	11.8	11.7	-0.5%
TOU-8-SUB	8.1	7.9	-1.5%
Group Total	11.1	10.9	-1.6%
Agricultural & Pumping			
PA-1	19.4	18.6	-4.3%
PA-2	13.5	13.0	-3.9%
TOU-AG	10.3	9.3	-9.6%
TOU-PA-5	9.4	9.6	1.9%
Group Total	11.6	11.1	-4.3%
Street & Area Lighting	17.0	19.5	14.5%
Grand Total	14.0	13.8	-1.2%

Notes:

2007 rates reflect current charges as of Oct 7, 2007 based on 2007 sales forecast.

2008 rates reflect estimated April 2008 revenue requirements based on 2008 sales forecast.



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DA Cost Responsibility Surcharge (DA CRS)

1st Quarter 2008 Changes

Background

- DA CRS is capped at 2.7 cents/kWh and consists of four components:
 - Department of Water Resources (DWR) Bond Charge
 - Recovers the interest and principal of DWR bonds.
 - Competition Transition Charge (CTC)
 - Recovers the above market costs of utility retained generation
 - Power Charge Indifference Adjustment (PCIA)
 - Reflects DA customers' share of ongoing power costs after 2002
 - DA CRS Undercollection Contribution (DA-CRS-UC)
 - Recovers revenues uncollected from DA customers during the period over which the full cost DA-CRS exceeded the capped DA-CRS.
- DA customers that return to bundled service remain responsible for DA-CRS-UC
 - Schedule DAEBSC-CRS (DA Eligible Bundled Service Customer) 7

Customer Impact

- Forecasted 1st Quarter 2008 Rate Change
 - DWR Bond Charge increased from 0.469 to 0.477 cents/kWh
 - Indifference Rate will increase from 0.222 to 0.443 cents/kWh
 - Indifference Rate is the sum of CTC and PCIA
 - DA-CRS-UC will decrease from 2.009 to 1.780 cents/kWh to offset the increases to the other DA-CRS components
 - DA CRS continues to be capped at 2.7 cents/kWh
- Most DA customers will see no impact to their bills

2008 DA CRS Sample Table
DA Customer

DA CRS Component	Current Rate (¢/kWh)	April 7, 2008 Rate (¢/kWh)
DWR Bond	0.469	0.477
CTC*	0.613	0.336
PCIA*	(0.391)	0.107
DA CRS UC	2.009	1.780
Total	2.700	2.700

*Based on a TOU-8 SEC rate

Continuous DA Customer Impact

- Continuous DA customers will experience a rate decrease
 - Decrease due to a decrease in CTC
 - Customers who were DA from Feb. 1 to Sept. 20, 2001
 - Exempt from the DWR Bond Charge, PCIA and DA CRS UC components of the DA-CRS

**2008 DA CRS Sample Table
Continuous DA Customer**

DA CRS Component	Current Rate (¢/kWh)	April 7, 2008 Rate (¢/kWh)
DWR Bond	0.000	0.000
CTC*	0.613	0.336
PCIA	0.000	0.000
DA CRS UC	0.000	0.000
Total	0.613	0.336

*Based on a TOU-8 SEC rate

(DA Eligible Bundled Service Customer)

DAEBSC Customer Impact

- DAEBSC customers are former DA customers who have returned to bundled service but are still DA-eligible
- DAEBSC customers will experience a rate decrease
 - Decrease due to decrease in DA-CRS-UC

**2008 DA CRS Sample Table
DAEBSC Customer**

DA CRS Component	Current Rate (¢/kWh)	April 7, 2008 Rate (¢/kWh)
DA CRS UC	2.009	1.780
Total	2.009	1.780

- DAEBSC customers who retain their Continuous DA status are not currently paying DA-CRS-UC and will see no impact to their bills

Glossary Of Terms

- BPS – Bundled Portfolio Service
- CAISO – California Independent System Operator
- CPUC – California Public Utilities Commission
- CRC – Consolidated Rate Change
- CTC – Competition Transition Charge
- CWIP – Construction Work in Progress
- DA – Direct Access
- DA-CRS – DA Cost Responsibility Surcharge
- DA-CRS-UC – DA-CRS Under collection Charge
- DAEBSC – DA Eligible Bundled Service Customer
- DWR – Department of Water Resources
- ERRRA – Energy Resource Recovery Account
- FERC – Federal Energy Regulatory Commission
- GRC – General Rate Case
- kWh – kilo Watt Hour
- MW – Mega Watt
- OAT – Otherwise Applicable Tariff
- PCIA – Procurement Charge Indifference Adjustment
- PROACT – Procurement Related Obligations Account
- TTA – Trust Transfer Amount
- URG – Utility Retained Generation



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SCE 2008 Rate Update

March 2008



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- ***Average rates for most customer groups will decrease slightly***
 - *Increase in delivery costs was offset by decrease in generation costs*

- ***Average rates for streetlight customers will increase***
 - *Mainly due to a 14.7% increase in distribution costs*
 - *Distribution costs makes up 61% of total rate*
 - *Moves Rate closer to actual "Cost to Serve"*



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- ***Average rates for TC-1 customers will increase***
 - ***Mainly due to a decrease in sales forecast for 2008***

Bundled Service – Average Rate Levels (cents/kWh)

Southern California Edison Company

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Glossary Of Terms

- AP-I – Agricultural and Pumping - Interruptible
- BIP – Base Interruptible Program
- BPS – Bundled Portfolio Service
- CAISO – California Independent System Operator
- CBP – Capacity Bidding Program
- CPP – Critical Peak Pricing
- CPUC – California Public Utilities Commission
- CRC – Consolidated Rate Change
- CTC – Competition Transition Charge
- CWIP – Construction Work in Progress
- DA – Direct Access
- DA-CRS – DA Cost Responsibility Surcharge
- DA-CRS-UC – DA-CRS Under collection Charge
- DAEBSC – DA Eligible Bundled Service Customer
- DBP – Demand Bidding Program
- DPV2 – Devers Palo Verde
- DWR – Department of Water Resources
- ERRA – Energy Resource Recovery Account
- FERC – Federal Energy Regulatory Commission
- GRC – General Rate Case
- HPC – Historical Procurement Charge
- kWh – kilo Watt Hour
- MW – Mega Watt
- OAT – Otherwise Applicable Tariff
- PCIA – Procurement Charge Indifference Adjustment
- PROACT – Procurement Related Obligations Account
- SDP – Summer Discount Plan
- TTA – Trust Transfer Amount
- URG – Utility Retained Generation
- USFS – U.S. Forest Service