

Docket		<u>A.26-03-003</u>
Exhibit Number	:	<u>CalAdv-01</u>
Commissioner	:	<u>Matthew Baker</u>
Administrative Law Judge	:	<u>Douglas M. Long</u>
Public Advocates Office	:	<u>Mehboob Aslam</u>
Witness		



PUBLIC ADVOCATES OFFICE



EXECUTIVE SUMMARY

**Application of Southern California Edison Company (U338E)
for Authority to Recover Costs, Amongst Other Things, to its
Class C Water Utility and Smaller Gas Utility.**

Application 26-03-003

San Francisco, California
September 11, 2026

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1 **MEMORANDUM**

2 The Public Advocates Office at the California Public Utilities Commission
3 (“Cal Advocates”) examined application material, data request responses, and other
4 information presented by Southern California Edison (“SCE”) in Application
5 (“A.”) 26-03-003 to provide the California Public Utilities Commission (“Commission”
6 or “CPUC”) with recommendations in the interests of ratepayers for safe and reliable
7 service at the lowest cost. Mr. Mehboob Aslam is Cal Advocates’ project lead for this
8 proceeding. Mr. Victor Chan is the oversight supervisor, and Ms. Marybelle Ang is the
9 legal counsel.

10 Although every effort was made to comprehensively review, analyze, and provide
11 the Commission with recommendations on each ratemaking and policy aspect presented
12 in the Application, the absence from Cal Advocates’ testimony of any particular issue
13 connotes neither agreement nor disagreement of the underlying request, methodology, or
14 policy position related to that issue.

EXECUTIVE SUMMARY

In this application, Southern California Edison (SCE) requests recovery of costs incurred by its Class C water utility and small gas utility in providing water and gas services to customers on Santa Catalina Island. Specifically, SCE requests that the Commission authorize SCE to recover \$6.207 million¹ in recorded costs from several memorandum accounts, including the Catastrophic Event Memorandum Account (CEMA), Catalina Water Pipeline Assessment Memorandum Account (CWPAMA), Catalina Water Decommissioned Pipe Memorandum Account (CWDPMA), Catalina Water Rationing Memorandum Account (CWRMA), and Lead and Copper Rule Memorandum Account (LCMA). SCE also requests to collect its memorandum costs solely from non-residential customers.

Public Advocates recommends that the Commission reject or reduce SCE's requested recovery because certain costs are untimely, excessive, unsupported, or inconsistent with cost-causation principles. Public Advocates also recommends that any authorized costs be recovered through a fair and equitable rate design that appropriately reflects cost causation.

A. CEMA for Gas Utility

The Commission should not authorize SCE's recovery of \$428,197 of expenses recorded in COVID-19 CEMA for its gas operations during 2020-2022, because the recovery period has passed pursuant to General Order (G.O.) 96-B. This issue is discussed in greater detail in Cal Advocates' Report on Catastrophic Events Memorandum Account, COVID-19 Gas Account for more details.

B. CEMA for Water Operations

The Commission should not authorize SCE's recovery of \$2.57 million of expenses recorded in its COVID-19 CEMA Water expenses for 2020-2021, because the recovery period has passed pursuant to General Order (G.O.) 96-B, and the recorded

¹ \$5.779 million for water and \$0.428 million for gas operations.

costs are excessive, unsubstantiated, and unjustified. This issue is discussed in greater detail in Chapter 1 of Cal Advocates' Report on Water Memorandum Accounts and Proposed Revenue Recovery.

C. Revenue Recovery

The Commission should reject SCE's request to recover memorandum account costs solely from non-residential customers and instead require SCE to implement a fair and equitable rate design to recover costs the Commission determines are justified and reasonable. The resulting rates should reflect cost-causation principles and ensure that customers are assigned costs in a manner that corresponds to the costs they cause the utility to incur. Moreover, the Commission should order SCE to prepare a comprehensive alternative analysis that is backed by verifiable support and documentation to address the extreme affordability issue on Catalina Island. This issue is discussed in greater detail in Chapter 2 of Cal Advocates' Report on Water Memorandum Accounts and Proposed Revenue Recovery.

List of Cal Advocates Reports and Witnesses

The following Table ES-1 identifies the various Cal Advocates reports and witnesses that provide analysis and recommendations relevant to the requests made by SCE in the current proceeding:

Table ES-1: Cal Advocates Reports and Witnesses

Cal Advocates Witness	Report Title
Lindsay Loethen	Report on Catastrophic Event Memorandum Account, COVID-19 Gas Account
Sari Ibrahim	Report on Water Memorandum Accounts and Proposed Revenue Recovery
Mehboob Aslam	Executive Summary

APPENDIX A

QUALIFICATION OF WITNESS

**STATEMENT OF QUALIFICATIONS
OF
MEHBOOB ASLAM**

Q.1 Please state your name and business address.

A.1 My name is Mehboob Aslam. My business address is 320 West 4th Street, Suite 500, Los Angeles, CA 90013.

Q. 2 By whom are you employed and in what capacity?

A. 2 I am employed by the California Public Utilities Commission as a Public Utilities Regulatory Analyst (PURA)-V.

Q. 3 Please briefly describe your educational background and work experience.

A. 3 I graduated from the University of Engineering & Technology, Lahore, Pakistan, with a Bachelor of Science Degree in Mechanical Engineering, and also graduated from Western Kentucky University with a Master of Science Degree in Business Administration with an emphasis in Accounting and Finance. I have been employed by the CPUC since 2001. From 2001 through 2002, I was a member of the Consumer Protection and Safety Division, where I was responsible for energy utilities' operating practices to enforce the rules and regulations relating to the safe use of the plant and workforce. I performed engineering reviews and conducted incident investigations for both gas and electric utilities. I have also helped resolve customers' complaints. From 2002 through the present, I have been working for the Public Advocates Office in its Water Branch, mostly dealing with Class-A water utilities. I have performed evaluations of public utility plants and properties, regulation of utility tariffs and rates, studies of the cost of service, and studies of the utility's operating practices to enforce the rules and regulations relating to ratemaking. I have presented my findings and recommendations as an expert witness at public hearings before the Commission. I have also been actively involved with a few of Commission's OIR/OII proceedings.

Q. 4 What is your area of responsibility in this proceeding?

A. 4 I am a project coordinator in the SCE's cost recovery for its Class C Water Utility and Small Gas Utility proceeding and am responsible for preparing Executive Summary.

Q. 5 Does this conclude your prepared testimony?

A. 5 Yes, it does.