

Docket	<u>A.26-03-003</u>
Exhibit Number	: <u>Cal Adv - 03</u>
Commissioner	: <u>Mathew Baker</u>
Administrative Law Judge	: <u>Douglas M. Long</u>
Public Advocates Office	: <u>Sari Ibrahim</u>
Witness	



PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

**REPORT
ON
WATER MEMORANDUM ACCOUNTS AND
PROPOSED REVENUE RECOVERY**

San Francisco, California
September 11, 2026

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MEMORANDUM

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

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

Chapter #	Description	Witness
1	MEMORANDUM ACCOUNT COSTS	Sari Ibrahim
2	COST RECOVERY	Sari Ibrahim

CHAPTER 1 MEMORANDUM ACCOUNTS

I. INTRODUCTION

This chapter examines unreasonable and unsupported costs associated with the five memorandum accounts in Southern California Edison Company's (SCE) *Application of Southern California Edison Company for Authority to Recover Costs For Its Class C Water Utility and Small Gas Utility* (Application), filed on March 11, 2026.¹ The five water related memorandum accounts and amounts requested for recovery for each are as follows:

- Catastrophic Event Memorandum Account (CEMA), \$3.433 million;²
- Catalina Water Pipeline Assessment Memorandum Account (CWPAMA), \$765 thousand;³
- Catalina Water Decommission Pipe Memorandum Account (CWDPMNA), \$1.462 million;⁴
- Catalina Water Rationing Memorandum Account (CWRMA), \$17 thousand;⁵ and
- Lead and Copper Rule Memorandum Account (LCMA), \$102 thousand⁶.

¹ Application (A.) 26-03-003, *Application of Southern California Edison Company for Authority to, Among Other Things, Recover Costs For Its Class C Water Utility and Small Gas Utility* (Application), March 11, 2026.

² A2603003-SCE-Various-Testimony in Support of Application-SCE-01 (SCE-01) at 2, Table I-1, This includes \$2.57 million in CEMA COVID-19 related costs and \$863 thousand for CEMA Storm event related costs.

³ SCE-01 (SCE-01) at 2, Table I-1,

⁴ SCE-01 (SCE-01) at 2, Table I-1,

⁵ SCE-01 (SCE-01) at 2, Table I-1,

⁶ SCE-01 (SCE-01) at 2, Table I-1,

1 SCE operates the electric, water, and gas utilities on Santa Catalina Island
2 (Catalina, or Island). Specifically, this testimony only addresses the costs associated with
3 SCE's water utility.⁷ Of the above referenced amounts, The \$2.57 million in CEMA
4 COVID-19 costs discussed below should not be recovered in rates.

5 **II. SUMMARY OF RECOMMENDATIONS**

6 The Commission should deny SCE's request to recover \$2.57 million in CEMA
7 COVID-19 costs because the costs are unsupported and unreasonable.

8 **III. DISCUSSION**

9 **A. The Commission Should Deny Recovery of SCE's CEMA** 10 **COVID-19 Water Expenses**

11 SCE's request to recover \$2.57 million for CEMA COVID-19 Water expenses are
12 not justified and should be denied.⁸ SCE has not provided adequate support to
13 substantiate its request. Ratepayers should bear only those costs that are just, reasonable,
14 and prudently incurred, and that are attributable to the utility service they receive.

15 **1. The Timing of SCE's Request for Recovery** 16 **Exceeds the Allowable Three-Year Recovery Period** 17 **Established by the Commission⁹**

18 SCE's first recorded COVID-19 related costs in its accounting system in April
19 2020.¹⁰ SCE's CEMA COVID-19 closing sheets show recorded activity between August
20 2020 through June 2021.¹¹ However, SCE did not file its Application until March 11,
21 2026. Therefore, the timing of SCE's recovery request violates the three-year period
22 imposed by G.O. 96-B to request recovery.

⁷ A second report, prepared by Lindsay Loethen, addresses costs associated with SCE's Gas Utility.

⁸ SCE-01 at 2 Table I-1.

⁹ General Order 96-B (G.O. 96-B), Water Industry Rule 8.5 provides that "[a] Utility may not request recovery for an under-collection that is over three years old."

¹⁰ PubAdv-SCE-001-SIH Q.01.a Answer.

¹¹ A2603003_Water CEMA Closing Sheets.

1 SCE's recovery request is contrary to the Commission's longstanding priority of
2 ensuring that cost-causation is reflected in rate setting proceedings.¹² Cost-causation
3 refers to the principle that "costs should be borne by those customers who caused the
4 utility to incur the expense."¹³ When a utility delays recovery for several years, the
5 likelihood of the utility collecting from customers who did not cause or benefit from the
6 utility's expenses increases substantially. Accordingly, SCE's delay raises legitimate
7 cost-causation concerns.

8 **2. SCE's Costs Are Excessive, Unsubstantiated, and**
9 **Unjustified**

10 SCE is unable to justify how two employees could cause an incremental cost of \$3
11 million in less than a year.¹⁴ Furthermore, SCE has not provided sufficient evidence to
12 establish that the requested COVID-19 costs were incremental, reasonable, and actually
13 incurred by the water utility. Across its three utilities (gas, electric, and water), SCE
14 sequestered ten employees and four contract security guards during COVID.¹⁵ Of those
15 fourteen individuals, only two employees are fully dedicated to the water and gas
16 utilities.¹⁶ The remaining employees charge approximately fifteen percent of their costs to
17 the water and gas utility.¹⁷ As stated above, SCE's closing sheets reflect activity over a
18 ten-month period.¹⁸ SCE claims that the work of two employees, and fifteen percent of
19 the work of twelve others, caused approximately three million dollars in incremental
20 costs over a ten month period which equates to approximately \$300,000 per month.

¹² See Decision (D.) 87-12-066 at 392. The Commission noted that avoiding cross-subsidies and supporting cost-causation principles "achieves equity in rates by relating the costs imposed on the utility system to the customer responsible for those costs."

¹³ Rulemaking (R.) 12-06-013 at 13.

¹⁴ SCE-01, Table I-1, at 2 Table I-1. SCE requests \$2.507 million for water related CEMA COVID-19 costs and \$0.428 million for gas.

¹⁵ SCE-01 at 22, line 1.

¹⁶ SCE-01 at 22, line 12.

¹⁷ SCE-01 at 22, line 14.

¹⁸ August 2020 through June 2021.

SCE fails to justify or support how the labor, contract, material, and other costs assigned to the water utility were calculated, incurred, or allocated. For example, in its testimony, SCE provided Table 1-1 below, to justify these costs.¹⁹ Then, in response to Cal Advocates' data request for supporting information and payroll stubs, SCE submitted the same table without supporting documents or paystubs.²⁰ SCE simply claimed that "[t]hese labor costs are derived from numerous lower-level transactions, accounting entries, and allocations across multiple cost objects."

Table 1-1
COVID-19 Activity Cost Category - Water (Nominal \$)

Cost Category	2020	2021	2022	Total
Premium Time Labor	\$ 1,366,653	\$ 318,191		\$ 1,684,845
Material	\$ 2,140	\$ 148		\$ 2,289
Contract	\$ 201,688	\$ 37,343		\$ 239,030
Other	\$ 587,133	\$ 70,609	\$ (20,431)	\$ 637,311
Allocation	\$ 5,932	\$ 520		\$ 6,452
Total	\$ 2,163,546	\$ 426,812	\$ (20,431)	\$ 2,569,927

In its testimony, SCE cites a Commission Decision to support its electrical Catalina Island sequestration costs.²¹ However, SCE fails to adequately address the following Commission directive to SCE "[i]n its future CEMA applications and testimony, SCE should include clearer documentation to support O&M costs that are CPUC jurisdictional and incremental."²² SCE's request for recovery and response to Cal Advocates' data request do not satisfy that directive. SCE claims \$1,684,845 in Premium Time Labor costs outside of its General Rate Case (GRC) forecast but failed to provide

¹⁹ SCE-01, Table II-4 at 23.

²⁰ PubAdv-SCE-001-SIH Q.01.d Answer.

²¹ D.23-11-089.

²² D.23-11-089 at 25.

1 paystubs to support this claim.²³ For other claimed costs, SCE provided incomplete,
2 fragmented, and deficient documentation.²⁴

3 The magnitude of SCE’s request relative to the number of employees and
4 ratepayers further underscores the need for adequate documentation. SCE collected \$57.6
5 million in CEMA COVID-19 related costs from nearly five million customers, with \$17.3
6 million allotted specifically for employee sequestration.²⁵ By comparison, SCE now
7 seeks to recover from four thousand customers²⁶ approximately \$2.57 million in
8 sequestration costs associated with two dedicated employees and 15% of the remaining
9 employees’ costs. SCE seeks authorization to collect approximately \$642 per connection
10 without adequate support for these costs.²⁷ Ratepayers should not pay for costs that are
11 unjustified and unsupported. Accordingly, the Commission should deny SCE’s request to
12 recover \$2.57 million in COVID-19 related incremental costs.

13 **IV. CONCLUSION**

14 The Commission should deny SCE’s requests to recover \$2.57 million in CEMA
15 COVID-19 related costs. SCE has failed to demonstrate that the CEMA COVID-19
16 employee sequestration costs are reasonable because it cannot produce invoices or
17 records to verify that the costs were actually incurred or paid. Further, SCE’s request has
18 passed the recovery period mandated by G.O. 96-B. To protect ratepayers from funding
19 unreasonable and unsupported costs, the Commission deny SCE’s recovery requests as
20 outlined above.

²³ Data Request SIH-01 Water Memo Accounts Spending (SIH-01) asked “For the labor costs recorded, provide all backups and payroll stubs reconciling(sic) the recorded amounts” SCE did not provide any support except an excel workbook included as Appendix B, Attachment 1 to this testimony.

²⁴ See Appendix B, Attachment 2. Provides a comparison of SCE’s invoices to sample invoices.

²⁵ D.23-11-089 at 21, 24.

²⁶ Catalina Island has approximately 4000 residents <https://www.lovecatalina.com/community-information/> last accessed 8/31/2026.

²⁷ \$2.57M / 4000 connections = \$642

CHAPTER 2 REVENUE RECOVERY

I. INTRODUCTION

SCE proposes to collect its memorandum account costs solely from non-residential customers on the Island and to amortize those costs over five years.²⁸ SCE argues that non-residential customers are the only customer class that can pass along these increased water costs to their customers.²⁹ SCE's proposal contravenes the core ratemaking principle of cost causality and ignores the long-term issues that Santa Catalina Island faces. Moreover, SCE's proposal to collect from non-residential customers is simply a band aid fix that does not provide a long-term solution.

The Commission should reject this approach and adopt a fair and equitable rate design for costs that is just reasonable, and recoverable.

II. SUMMARY OF RECOMMENDATIONS

The Commission should implement the following recommendations:

- Reject SCE's proposal to recover memorandum account balances solely from commercial customers. SCE's proposal is unfair, inequitable, and contravenes core ratemaking principles.
- Adopt a fair and equitable rate design to recover justified and reasonable costs.
- Rates should reflect a fair representation of cost-causality principle.

III. DISCUSSION

A. SCE's Proposal Contravenes Core Ratemaking Principles

SCE's proposal to limit revenue collection to non-residential customers would unreasonably shift memorandum account costs incurred by additional customer classes within SCE's water system. Cost-causation principle requires that ratepayers should only pay for the costs that they cause. Standard Practice (S.P.) U-27-W provides that "[s]urcharges or surcredits for recovery of memo accounts should be spread across all

²⁸ Application at 4, 8.

²⁹ Application at 8.

1 utility services that have benefited from the money spent and booked to the memo
2 account.”³⁰ SCE’s proposal to limit the revenue collection to non-residential customers is
3 inconsistent with S.P U-27-W and cost-causation ratemaking principle and should be
4 denied by the Commission.

5 SCE proposes collecting the memorandum account costs solely from non-
6 residential customers.³¹ SCE believes that non-residential customers have the ability to
7 pass along rate increases to their customers.³² Additionally SCE believes that those
8 customers are mostly tourists visiting the island not residents.³³ SCE requests to recover
9 costs from memorandum account that are incremental costs caused by *all* customer
10 classes across SCE’s water system, not visitors to the Catalina Island. The CEMA
11 COVID-19 account, which represents the bulk of the proposed cost recovery, includes
12 costs accrued when stay-at-home orders were in place. During this time, visitor travel to
13 the Island declined.³⁴

14 The CEMA Storm Events account includes costs that affect facilities that serve the
15 entire Island. Catalina Water Pipeline Assessment Memorandum Account (CWPAMA)
16 and Catalina Water Decommission Pipe Memorandum Account (CWDPMMA) relate to
17 older pipelines on the Island that serve the entire Island.³⁵ Lead and Copper Rule
18 Memorandum Account (LCMA) costs relating to regulatory requirements are also
19 applied Island-wide. These costs therefore cannot be characterized as costs caused
20 exclusively by visitors or by non-residential customers. The costs arise from operating,
21 maintaining, and complying with requirements applicable to the entire Catalina water
22 system.

³⁰ Standard Practice (SP) U-27-W, Section 47.

³¹ SCE-01 at 7, line 13.

³² SCE-01 at 7, lines 15-16.

³³ SCE-01 at 7, lines 16-17.

³⁴ Love Catalina Island Tourism Authority, Visitor Counts, July 10, 2026,
<https://www.lovecatalina.com/members/resources/visitor-counts/> (last accessed July 30, 2026).

³⁵ Both accounts are for the study and decommissioning respectively of pipelines on the Island.

Under SCE's proposal, non-residential customers would see an increase of 10% and 7% for Irrigation class customers in 2027.³⁶ SCE's proposed five year amortization period would result in the annual increases of 22% for non-residential and 16% for irrigation customers in the fifth and final year, 2031.³⁷ By contrast, if the total requested amount is to be collected from all customer classes, the increases would range from 5% to 8% across customer classes in 2027 to 7% to 14% in 2031. Tables 2-1 and 2-2 below summarize the increases for 2027 and 2031 for each scenario. The increase across all customer classes will be even lower if the Commission excludes unreasonable costs. Attachment 3 of SEC's testimony provides a complete comparison of the proposed revenue recovery scenarios.

Table 2-1 Average Bill Increase in 2027³⁸

	Base	Non-Res Surcharge		Surcharge - All	
Meter / Pipe Size	Avg Monthly Total	Avg Monthly Total	% Inc.	Avg Monthly Total	% inc,
Res	\$223.66			\$233.81	5%
Res-Dual	\$499.94			\$519.06	4%
Res-CARE	\$180.53				
Res-CARE-Dual	\$243.59				
Res-DE	\$180.15			\$189.58	6%
Res-DE-Dual	\$279.86			\$288.55	3%
Res-MM	\$1,467.44			\$1,535.23	5%
Res-MM-Dual					
Com	\$1,396.83	\$1,538.65	10%	\$1,489.88	8%
Com-CARE					
IRRI	\$456.67	\$489.74	7%	\$478.37	5%
FIRE	\$141.87				

³⁶ A2603003-SCE-Various-Supplemental Testimony-SCE-02 (SCE-02), Table V-7 at 13.

³⁷ SCE-02, Table V-7 at 13.

³⁸ PubAdv-SCE-004-SIH Q.01.a-c, Answer Surcharge Bill Impact Summary.

Table 2-2 Average Bill Increase in 2031³⁹

	Base	Non-Res Surcharge		Surcharge - All	
Meter / Pipe Size >>>	Avg Monthly Total	Avg Monthly Total	% Inc.	Avg Monthly Total	% Inc.
Res	\$265.92			\$291.93	10%
Res-Dual	\$594.40			\$643.39	8%
Res-CARE	\$214.64				
Res-CARE-Dual	\$289.62				
Res-DE	\$214.19			\$238.34	11%
Res-DE-Dual	\$332.74			\$355.02	7%
Res-MM	\$1,744.70			\$1,918.39	10%
Res-MM-Dual					
Com	\$1,660.74	\$2,024.11	22%	\$1,899.17	14%
Com-CARE					
IRRI	\$542.95	\$627.69	16%	\$598.55	10%
FIRE	\$168.67				

These bill impacts demonstrate the importance of customer class allocation across memorandum account costs. SCE's proposal imposes the recovery burden on a limited group of customers even though the underlying costs are associated with the entire Catalina water system. The Commission should impose a broader allocation to distribute recovery proportionately to the costs incurred and benefits received with the system.

B. SCE's Proposal is Short-Sighted and Ignores Reasonable Alternatives

SCE's proposal fails to adequately address affordability issues in Catalina without considering reasonable, feasible alternatives. SCE's proposed surcharge on non-residential customers extends from 2027 to 2031. SCE plans to file its next GRC for Test Year 2029 or 2030, which will impose new operating costs, capital costs, and memorandum account collections. Taken together, SCE's proposed recovery will impose substantial rate increases on Catalina residents' already high-water bills, exacerbating affordability concerns.

³⁹ PubAdv-SCE-004-SIH Q.01.a-c, Answer Surcharge Bill Impact Summary.

1 SCE proposes collecting \$1.462 million in costs related to the CWDPMAs.⁴⁰ This
2 is just a small fraction of the total costs SCE forecast related to the remediation activity
3 when it requested authority to open the memorandum account. In A.21-06-007, SCE
4 estimated that only \$1.7 million would be recorded to the CWDPMAs.⁴¹ In the same
5 application, SCE forecasted that the total cost of the remediation activities would be \$70
6 million.⁴² As with the multiple surcharges, SCE's efforts to piecemeal total costs lacks
7 transparency and makes its rate increases appear more reasonable, but does not provide a
8 complete picture of the affordability issue faced by the customers on the Island.

9 SCE dismisses its initial proposal to impose a boat fee without providing any
10 substantive analysis to support this decision or consider alternative recovery methods.
11 The Commission states, "In advance of future GRCs, we encourage SCE to seriously
12 consider the discussed alternative recovery sources, especially the visitor boat fee
13 discussed."⁴³ SCE states that "increasing the cost of a fare for visitors traveling to
14 Catalina has a direct affordability impact on those visitors getting to the Island and could
15 reduce the number of customers purchasing a ticket."⁴⁴ However, the available historical
16 data does not establish that modest increases in boat fees would result in a material
17 decline in visitor numbers. Figure 2-1 below shows that despite changes in boat fees over
18 the last decade, vehicle common carrier (VCC) visitor counts remained mostly stable.
19 The one anomaly is 2020, the year of the COVID-19 pandemic.

⁴⁰ SCE-01 at 2 Table I-1 Memorandum Account Names and Incremental O&M Amounts.

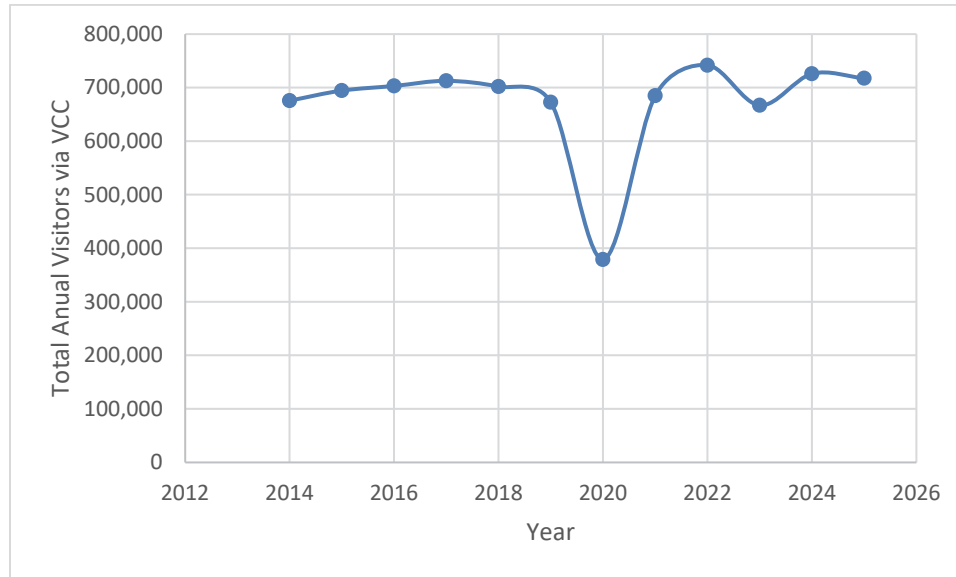
⁴¹ A.21-06-007 at 12.

⁴² A.21-06-007 at 7.

⁴³ D.23-12-007 at 70.

⁴⁴ SCE-01 at 70, lines 8-11.

1 **Figure 2-1**
2 **Total Annual VCC Visitors 2014-2025⁴⁵**



3
4 **C. Catalina Island visitor counts remain steady despite**
5 **increases in VCC costs.**

6 Since the SCE's last Water GRC in 2020, the Commission has granted VCCs a
7 20% Zone of Rate Freedom (ZORF) in response to increases in fuel prices.⁴⁶ The
8 Commission further granted Catalina Passenger Service a base rate increase range of
9 10%-35%.⁴⁷ The Commission also granted the Catalina Channel Express a base rate
10 increase of 16.67%.⁴⁸ Additionally, the City of Avalon adopted a \$2 wharfage fee on all
11 cross-channel carriers from the Avalon Harbor area.⁴⁹ Despite all these increases on VCC
12 cost, VCC visitor counts remain close to 700,000 annually.

⁴⁵ Love Catalina Island Tourism Authority, Visitor Counts, July 10, 2026,
<https://www.lovecatalina.com/members/resources/visitor-counts/> (last accessed July 30, 2026).

⁴⁶ Resolution TL-19139.

⁴⁷ D.24-12-010 at 9.

⁴⁸ D.25-06-046 at 24.

⁴⁹ SCE-01 at 71, lines 7-9.

1 **D. Revenue Does Not Need to Be Collected from One Source**

2 The Commission should reject SCE’s proposal to collect the full water utility
3 revenue requirement from a single funding mechanism and require SCE to evaluate a
4 variety of alternative revenue collection methods. With seven hundred thousand VCC
5 visitors annually, imposing a nominal \$1 each-way charge would generate \$1.4 million in
6 additional revenue and potentially relieve ratepayer burden. Visitors travel to Catalina on
7 cruises, private aircraft, private boats, and helicopters.⁵⁰ Approximately three hundred
8 thousand visitors arrive on non-VCC means, meaning fees can be collected through the
9 City of Avalon to generate additional relief for water bills.

10 SCE discusses the possibility of collecting more revenue through developer
11 fees.⁵¹ SCE goes on to dismiss developer fees as an option due to lack of availability of
12 water.⁵² . Meanwhile, SCE has filed a separate Application to amend its Tariff Rule 3 and
13 increase Safe Annual Yield on the Island.⁵³ This demonstrates there is additional water
14 availability for growth and development on the Island. Developer fees could also be a
15 supplemental source of revenue provided such developments pay the fair share for the
16 scarce commodity such as water on the Island.

17 In the prior GRC application,⁵⁴ SCE proposed several alternative revenue sources
18 such as water user fee increases, loans, bonds, grants, sale taxes, hotel taxes, bottled
19 water tax, and even a High-Cost Fund to support water service on the Island. SCE
20 dismissed each revenue source on the grounds that each source would be insignificant or
21 difficult to implement.⁵⁵ SCE ignores the fact that the sum of multiple revenue sources
22 will provide meaningful relief to Catalina Island’s water customers. Accordingly, the

⁵⁰ Love Catalina Island Tourism Authority, Visitor Counts, July 10, 2026,
<https://www.lovecatalina.com/members/resources/visitor-counts/> (last accessed July 30, 2026).

⁵¹ SCE-01 at 71, lines 15-72.

⁵² SCE-01 at 72, lines 6-8.

⁵³ A.26-04-017.

⁵⁴ A.20-10-018.

⁵⁵ SCE-01 at 70-72.

1 Commission should require SCE to conduct a comprehensive analysis of several
2 alternatives instead of relying on isolated surcharges and individual memorandum
3 account cost recovery proceedings.

4 **IV. CONCLUSION**

5 SCE's proposed revenue collection is unfair and contradicts core ratemaking
6 principles. SCE continuously dismisses potential revenue sources as being difficult to
7 implement or insignificant without proper analysis.⁵⁶ The water bills on Catalina Island
8 already face an affordability issue,⁵⁷ simple temporary fixes do not provide a long-term
9 solution for affordability. The Commission should order SCE to prepare a comprehensive
10 alternative analysis that is backed with verifiable support and documentation to address
11 the extreme affordability issue on Catalina Island.

⁵⁶ SCE dismisses the boat fee as impractical to implement

⁵⁷ SCE-01 at 3, line 9.

APPENDIX A:
Qualifications of Witness

**QUALIFICATIONS AND PREPARED TESTIMONY
OF
SARI IBARHIM**

Q.1 Please state your name and address.

A.1 My name is Sari Ibrahim, and my business address is 320 West 4th Street, Suite 500, Los Angeles, California 90013.

Q.2 By whom are you employed and what is your job title?

A.2 I am a Utilities Engineer in the Water Branch of the Public Advocates Office.

Q.3 Please describe your educational and professional experience.

A.3 I received a Bachelor of Science Degree in Civil Engineering from the Illinois Institute of Technology in 2013. I also earned a Master of Science Degree in Civil Engineering from California State University, Fullerton in 2019.

I have been with the Public Advocates Office – Water Branch since September 2019. I have served as an expert witness in multiple GRCs. Prior to joining the Public Advocates Office, I worked as an engineer primarily in the environmental remediation field for over six years.

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

A.4 My areas of responsibility are the water memorandum account costs and the proposed revenue recovery.

Q.5 Does that complete your prepared testimony?

A.5 Yes.

APPENIDX B:
Supporting Attachments

ATTACHMENT 1: CEMA COVID-19 SAMPLE INVOICES PROVIDED



210 South De Lacey Avenue
Pasadena, CA 91105
626.535.2200
<https://www.icsecurity.com>
TIN# 95-3020192

INVOICE

Invoice Number: BD0026983

Date: 06/09/2020

Location Code: 50771

Contact:

Bill To:

Southern California Edison - Cold Start
P.O. Box 700
Rosemead, California 91770
United States

Service Location:

CATALINA SPCL DTL A/C 1-7094 A/B
1 PEBBLY BEACH RD
AVALON, California 90704
United States

<i>Service Period</i>	<i>Customer Reference</i>	<i>Payment Terms</i>	<i>Due Date</i>
5/10/2020-5/23/2020	C1339/MSA CW2219700	Net 60	08/08/2020

<i>Services</i>	<i>Hours / Qty</i>				<i>Total</i>
	<i>Reg</i>	<i>OT</i>	<i>DOT</i>	<i>Hol</i>	
Timesheet Entries	480.00	480.00	48.00		\$42,005.76
Expense Lines					\$18,000.00
Total					\$60,005.76

Posts – Client Job Titles included in above summary:

CATALINA SPCL DTL A/C 1-7094 A/B _ 1-7094 CATALINA SPCL DTL AC /C
CATALINA SPCL DTL A/C 1-7094 A/B _ 1-7094 CATALINA SPCL DTL AC / A
CATALINA SPCL DTL A/C 1-7094 A/B _ 1-7094 CATALINA SPCL DTL AC / B



Invoice #: 100-002
So Cal Edison License Agreement

July 27, 2020

GUIDED DISCOVERIES, INC.

SERVICE / EXPENSE		TOTAL US \$
DEPOSIT		\$5,000.00
Week of 7/13/2020 - \$300 per night per person	13	\$31,500.00
Week of 7/20/2020 - \$300 per night per person	11	\$23,100.00
TOTAL		\$59,600.00

Please remit check to:

Guided Discoveries
Attn: Accounts Receivable
27282 Calle Arroyo
San Juan Capistrano, CA 92675

Memo: SoCal Edison License



8484 Wilshire Blvd.
Suite 515
Beverly Hills, CA 90211

INVOICE

DATE 7/2/2020 **DUE** 7/2/2020 **INVOICE #** 1231192227
PO Number:

BILL TO
So Cal Edison
2244 Walnut Grove Avenue
Rosemead CA 91770 USA

JOB SITE
Catalina Island CA

DESCRIPTION	QTY	RATE	AMOUNT
2 Station Restroom Trailer Rental Dates: 7/1 - 7/28 Rental Location: Catalina Island Billed at \$800 per unit per week.	4.00	800.00	3,200.00

SUBTOTAL 3,200.00
TAX 296.00

3,496.00

INV1DXH-RVX3-DKK1-738186

Issued on Monday, July 13, 2020 PDT
Created on Monday, July 13, 2020 PDT by aribasystem on behalf of Steve Nguyen

Header Level Information

ID : INV1DXH-RVX3-DKK1-738186
Supplier Invoice # : 1DXH-RVX3-DKK1
Invoice Date : Tuesday, July 14, 2020
PDT
Order : 8500075663
Remit To ID : 0013008173
Payment Terms : Z004-Net 30 Days
Sold To : default
Purchasing Unit : Edison Material
Supply
Remit To Address : AMAZON.COM LLC
Invoice Source Document : Purchase
Order
Edison Rep : MUNOZR

Invoice Summary

Base Amount	\$449.97 USD
Discount	-\$18.65 USD
Charges	\$18.65 USD
Taxes	\$0.00 USD
Gross Amount	\$449.97 USD

Edison Rep:
ID: MUNOZR
Name: ROSENDO MUNOZ JR.
Expiration Date:

Supplier:
AMAZON.COM LLC
410 TERRY AVE NORTH
SEATTLE, WA 98109
United States
Phone: +1 206 740-3811
Contact:

**INVOICE**

Page: 1

WorkCare, Inc.
300 S. Harbor Blvd., Suite 600
Anaheim, CA 92805
(714) 978-7488

INVOICE NUMBER: 0054253-IN

INVOICE DATE: 7/31/2020

Tax ID: 33-0779311

Southern CA Edison (COVID-19)
2244 Walnut Grove Ave
Rosemead, CA 91770

CUSTOMER NUMBER: 00-SCE02

CUSTOMER P.O.: 4501198677

TERMS: Terms are Net 60 Days

DESCRIPTION	QUANTITY	PRICE	AMOUNT
July 2020 Daily Wellness Checks for SCE Employees			
Physician (MD) case escalation by request and EMT oversight per month	1.000	1,500.000	1,500.00
EMT Screening Services Daily Rate for Todd Jones- • Virtual Screening for up to 105 employees	27.000	1,000.000	27,000.00
• 24/7 Telephonic wellness follow up			
• 24/7 Telephonic on-call availability (call back within 30 minutes)			
Virtual Screenings for July were 708 -Amount Exceeding 105 employees every 3 days were 0			

Accounts Payable

PLEASE REMIT TO ADDRESS ABOVE.

INVOICE TOTAL: 28,500.00

ATTACHMENT 2: OTHER SAMPLE INVOICES PROVIDED



Bill To:
Southern California Edison
Accounts Payable

Invoice Number: 026637
Invoice Date: 11/29/2023
Billing Period: From 11/1/2023 To 11/30/2023
Payment Terms: NET 30 Due Date: 12/29/2023

Project Code: 2246
Project Title: Catalina Initiative
Order Number: 8500156002

INVOICE

Description	Amount
Project: CATALINA INITIATIVE	
cc:isaacson@kearnswest.com; mding@kearnswest.com	
Fixed Price	
Professional Services November 2023	\$ 15,000.00
Total for Fixed Price:	\$ 15,000.00
Total for Project CATALINA INITIATIVE:	\$ 15,000.00

Total Amount Due This Invoice: \$ 15,000.00

Kearns & West, Inc. 1990 K Street, NW Suite 620 Washington, DC 20006 (202) 448-8772 Tax ID: 04-2813873

Please remit payment to:
For Check Processing Only:
Kearns & West
PO Box 392853
Pittsburgh PA 15251-9853



Geosyntec Consultants, Inc.
900 Broken Sound Parkway NW, Suite 200
Boca Raton, Florida 33487-3575 USA
Tel (561) 995-0900 Fax (561) 995-0925

SOUTHERN CALIFORNIA EDISON
P.O. BOX 700
ROSEMEAD, CA 91770
Attention: ACCOUNTS PAYABLE

Invoice #: 21571934
Invoice Date: 7/8/2024
Project: HR1921
Project Name: CATALINA DECOMMISSIONED
PIPE

For Professional Services Rendered through transaction date: 6/30/2024

IF YOU HAVE QUESTIONS ABOUT THIS INVOICE, PLEASE CONTACT ALEX ROGASKI

SCE PO#8500142991, CWA:14

IO# 345158, 345114

SCE PM - SCOTT LUTZ

CATALINA DECOMMISSIONED PIPE/SCOTT LUTZ

INVOICES APPROVED BY SCE PM AND THEN WILL BE UPLOADED TO Ariba

Professional Services	\$2,936.50
Current Invoice	\$2,936.50

****Amount Due This Invoice **** **\$2,936.50**

Statement

Prior Billings	\$24,531.21	Project Budget	\$329,719.00
Current Invoice	\$2,936.50	Expended to Date	\$27,467.71
Billed To Date	\$27,467.71	Contract Balance	\$302,251.29
Paid To Date	\$4,251.25	**Amount Due This Invoice **	\$2,936.50

Geosyntec and its subsidiaries will not send updated bank information without a follow up telephone conversation. Any bank information update received without verbal confirmation from the appropriate Geosyntec employee should not be relied upon for payment. It is Client's responsibility to verify the change in bank information prior to issuing payment. Client will remain liable for full payment of Geosyntec's Invoices where Geosyntec does not receive payment as a result of Client's use of unconfirmed bank information.

When making payment via bank, please include our invoice number in ACH information; Please email invoice payment remittance/details to CorporateAR@Geosyntec.com.

Bank Details: Citibank N.A.
Coconut Creek Branch 0529
4807 Coconut Creek Pkwy
Coconut Creek, FL 33063

Account #: 2195223812
ABA/Routing: 067004764 (ACH) 268086554 (Wire)
Swift: CITI US 33

When making payment via check, please remit payment to: **Mail Code 11160**
P.O. Box 70280
Philadelphia, PA 19176-0280



American Integrated Services, Inc.
P.O. Box 92316
Long Beach CA 90809-2316
(310) 522-1168

License: 757133

Service Invoice

Invoice#: 2040600

AIS Project#: 43091

Date: 12/08/2024

Billed To: SOUTHERN CALIFORNIA EDISON
SUPPLIER PORTAL - ARIBA

Location: MIDDLE RANCH SCE STAGING AREA
CATALINA ISLAND CA 90704

Contact: SCOTT LUTZ / SCOTT.LUTZ@SCE.COM

Description of Services: 43091-16 SCE BC REMEDIATION
Representative: Brian S Chang

Client PO#: CW2249604
Client Project #: CWA #71

Qty	Description	Svc Date	Unit	Unit Price	Total
1.00	PAYMENT REQUEST 04:	11/04-11/19	LS	\$169,540.18	\$169,540.18

Remit to Address:
American Integrated Services, Inc.
P.O. Box 92316
Long Beach, CA 90809-2316

AIS Tax ID No.
95-4698255

Non-Taxable Amount:	169,540.18
Taxable Amount:	0.00
Sales Tax:	0.00
Amount Due	169,540.18



Environmental Intelligence, LLC
1590 S Pacific Coast Hwy Ste 17
Laguna Beach, CA 92651

INVOICE # CINV-211393

DATE: 07/31/23

CUSTOMER ID: C-002972

SERVICES THROUGH: 07/31/23

DUE DATE: 09/29/23

MEP005 Coastal

1 - Project Management : Ormond Beach Plant < IO#600516 >

LABOR CATEGORY	PERSON	DATE	DESCRIPTION	HOURS	RATE	AMOUNT
Environmental Planner Lead	Linda Nguyen	07/05/23	Prepared Ormond Beach applicaiton package. Printed and shipped package.	2	\$ 135.00	\$ 270.00
		07/28/23	Coordinated with L. Paprocki on application status.	0.25	\$ 135.00	\$ 33.75
1 - Project Management : Ormond Beach Plant < IO#600516 > Subtotal				2.25		\$ 303.75

2 - Licensing, Permitting, and Pre-Construction Support : Ormond Beach Plant < IO#600516 >

LABOR CATEGORY	PERSON	DATE	DESCRIPTION	HOURS	RATE	AMOUNT
Environmental Program Manager	Travis Kegel	07/27/23	Review CCC comments	1.5	\$ 155.00	\$ 232.50
2 - Licensing, Permitting, and Pre-Construction Support : Ormond Beach Plant < IO#600516 > Subtotal				1.5		\$ 232.50

1 - Project Management : Programmatic Coastal Permits < IO#758182 >

LABOR CATEGORY	PERSON	DATE	DESCRIPTION	HOURS	RATE	AMOUNT
Environmental Planner Lead	Cassidy Walsh-Becker	07/26/23	Began inputting source citations into Regulatory Register spreadsheet	4	\$ 135.00	\$ 540.00
		07/27/23	Continued updating Regulatory Register spreadsheet	4	\$ 135.00	\$ 540.00
		07/31/23	Met with Travis to discuss progress on Source Citations project, continued updating spreadsheet	4	\$ 135.00	\$ 540.00
Environmental Program Manager	Travis Kegel	07/20/23	Project review with X. Ouyang	2	\$ 155.00	\$ 310.00
		07/21/23	Review Citation files, coordinate with C. Walsh	1	\$ 155.00	\$ 155.00
		07/27/23	Coordinate with C Walsh review prelim citation files	2	\$ 155.00	\$ 310.00
1 - Project Management : Programmatic Coastal Permits < IO#758182 > Subtotal				17		\$ 2,395.00

1 - Project Management : Pilot Project - WS1 < IO#342990 >

LABOR CATEGORY	PERSON	DATE	DESCRIPTION	HOURS	RATE	AMOUNT
Environmental Planner Lead	Linda Nguyen	07/10/23	Coordinated with M. Provance, G. Robles, P. Trinch for Catalina survey work. Coordinated with T. Hendrickson and N. Gerrells for maps.	2.75	\$ 135.00	\$ 371.25

PAGE 1 OF 5



INVOICE

451 Clovis Avenue
Suite 200
Clovis, Ca Form 93612
(559) 326-1400
FEIN: 94-1424814

Southern California Edison
Attn:

Invoice Number 74354
Date 08/16/2023

Project 220-C-24 (320) Catalina Pipeline
Characterization

Professional Services from 7/3/2023 through 8/6/2023

PO 2530101333 - expires 12/31/2022
W/SA 00003000
Sub-Agreement C972258863

Professional Fees

	Hours	Rate	Billed Amount
Associate Civil/Structural/Geotech. Engineer	8.50	105.00	892.50
Invoice Total			892.50

Invoice Summary

Description	Contract Amount	Current Billed	Prior Billed	Total Billed	Remaining
Additional Work Prior to Phase 3	23,003.00	0.00	22,434.30	22,434.30	2,568.70
Phase 3 Water Facility Work	97,000.00	892.50	53,336.99	54,229.49	42,770.51
Total	122,003.00	892.50	75,771.29	76,663.79	45,340.21

Aging Summary

Invoice Number	Invoice Date	Outstanding	Current	Over 30	Over 60	Over 90	Over 120
73852	07/21/2023	2,955.25	2,988.25				
74354	08/16/2023	892.50	892.50				
Total		3,847.75	3,880.75	0.00	0.00	0.00	0.00

Blair, Church & Flynn, Inc. is a professional corporation. The undersigned is a duly licensed professional engineer in the State of California. The undersigned hereby certifies that the foregoing invoice was prepared by him or her or under his or her direct supervision and that the work was performed by him or her or under his or her direct supervision. The undersigned hereby certifies that the foregoing invoice was prepared by him or her or under his or her direct supervision and that the work was performed by him or her or under his or her direct supervision. The undersigned hereby certifies that the foregoing invoice was prepared by him or her or under his or her direct supervision and that the work was performed by him or her or under his or her direct supervision.

ATTACHMENT 3: REVENUE COLLECTION COMPARISON TABLE

Catalina Water Average Monthly Bill		2027		
2026		Base	Non-Res Surcharge	Surcharge - All
Meter / Pipe Size >>>	Avg Monthly Total	Avg Monthly Total	Avg Monthly Total	Avg Monthly Total
Res	\$195.12	\$223.66		\$233.81
Res-Dual	\$436.17	\$499.94		\$519.06
Res-CARE	\$157.51	\$180.53		
Res-CARE-Dual	\$212.51	\$243.59		
Res-DE	\$157.36	\$180.15		\$189.58
Res-DE-Dual	\$254.33	\$279.86		\$288.55
Res-MM	\$1,280.30	\$1,467.44		\$1,535.23
Res-MM-Dual				
Com	\$1,218.83	\$1,396.83	\$1,538.65	\$1,489.88
Com-CARE				
IRRI	\$398.45	\$456.67	\$489.74	\$478.37
FIRE	\$123.78	\$141.87		

2028			2029		
Base	Non-Res Surcharge	Surcharge - All	Base	Non-Res Surcharge	Surcharge - All
Avg Monthly Total	Avg Monthly Total	Avg Monthly Total	Avg Monthly Total	Avg Monthly Total	Avg Monthly Total
\$252.17		\$278.19	\$256.14		\$282.15
\$563.68		\$612.65	\$572.54		\$621.52
\$203.55			\$206.75		
\$274.65			\$278.97		
\$203.11		\$227.27	\$206.31		\$230.46
\$315.53		\$337.80	\$320.49		\$342.77
\$1,654.51		\$1,828.20	\$1,680.53		\$1,854.21
\$1,574.89	\$1,938.25	\$1,813.31	\$1,599.65	\$1,963.02	\$1,838.08
\$514.89	\$599.62	\$570.49	\$522.98	\$607.72	\$578.58
\$159.95			\$162.47		

2030			2031		
Base	Non-Res Surcharge	Surcharge - All	Base	Non-Res Surcharge	Surcharge - All
Avg Monthly Total	Avg Monthly Total	Avg Monthly Total	Avg Monthly Total	Avg Monthly Total	Avg Monthly Total
\$260.23		\$286.24	\$265.92		\$291.93
\$581.68		\$630.67	\$594.40		\$643.39
\$210.05			\$214.64		
\$283.42			\$289.62		
\$209.60		\$233.76	\$214.19		\$238.34
\$325.61		\$347.89	\$332.74		\$355.02
\$1,707.37		\$1,881.06	\$1,744.70		\$1,918.39
\$1,625.20	\$1,988.57	\$1,863.63	\$1,660.74	\$2,024.11	\$1,899.17
\$531.33	\$616.07	\$586.93	\$542.95	\$627.69	\$598.55
\$165.06			\$168.67		