

Application No.: A.26-03-009 et al.
Exhibit No.: SCE-06
Witnesses: E. Gomez
E. Keating



(U 338-E)

***SCE-06: Supplemental Testimony of Southern
California Edison Company in Support of its
Application for Approval of its 2028-2031
Portfolio Plan and 2032-2035 Business Plan***

Before the

Public Utilities Commission of the State of California

Rosemead, California
September 30, 2026

SCE-06: Supplemental Testimony of Southern California Edison Company in Support of its Application for Approval of its 2028-2031 Portfolio Plan and 2032-2035 Business Plan

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1 I.

2 **INTRODUCTION**

3 Pursuant to the Administrative Law Judge's (ALJ's) Ruling Directing Submission of Corrections
4 and Supplemental Information from All Business Plan Applicants, dated September 2, 2026 (Ruling)
5 and the "ALJ Ruling Requesting Corrections and Supplemental Testimony Process and Filing
6 Instructions for PAs September 2026," issued by the California Public Utilities Commission's
7 (Commission's) Energy Division Staff on September 15, 2026 (Filing Instructions), Southern California
8 Edison Company (SCE) submits this supplemental testimony in support of its 2028-2031 Energy
9 Efficiency (EE) Portfolio Plan and 2028-2035 Business Plan Application. The Ruling directs all
10 applicants to submit amended total system benefit (TSB) and cost-effectiveness values using corrected
11 Avoided Cost Calculator/Cost Effectiveness Test tool inputs, together with any non-substantive
12 corrections to program names, values, segments, or other application information. The Ruling also
13 directs applicants to address the potential effects of the California Air Resources Board's (CARB's)
14 proposed Clean Space and Water Heater Standards and to provide an updated third-party solicitation
15 schedule and timeline for 2028 through 2031.

16 Consistent with the Filing Instructions, SCE is submitting corrected California Energy Data and
17 Reporting System (CEDARS) forecast information and updated filing materials, including its Budget
18 Filing Appendices, program cards, Excel tables, and affected portions of SCE's direct testimony
19 (Exhibit 1). This supplemental testimony: (1) summarizes the resulting portfolio-level budget, TSB, and
20 cost-effectiveness impacts; (2) identifies the location of corresponding testimony and data updates;
21 (3) responds to the two supplemental questions identified in the Ruling; and (4) makes a correction to
22 the treatment of EE Financing Programs funding in SCE's portfolio.

23 SCE is timely submitting the required corrections and supplemental information on September
24 30, 2026.¹

¹ The Ruling required all amendments and corrections to be uploaded to CEDARS by September 18, 2026 and the supplemental testimony to be served by September 25, 2026. On September 9, 2026, the ALJ issued an email ruling granting an extension to submit all information required by the Ruling by September 30, 2026.

1 II.

2 **PORTFOLIO LEVEL IMPACTS SUMMARY**

3 Table II-1 summarizes the changes to SCE’s forecasted portfolio budgets and TSB resulting
4 from the corrected Avoided Cost Calculator and Cost-Effectiveness Test tool inputs. In summary, the
5 corrections have a positive impact on SCE’s forecasts of TSB and portfolio cost-effectiveness and do
6 not change SCE’s portfolio-level budget. SCE forecasts an increase of TSB from approximately \$874
7 million to approximately \$922 million, which is 143 percent of Commission’s goals (versus 135 percent
8 originally forecasted).

9 The table presents the original and revised values by portfolio segment for the 2028–2031
10 period, as well as the resulting percentage changes.

Table II-1
Summary of Budget and TSB Impacts

Segment	Original Budget	Revised Budget	Budget % Change	Original TSB	Revised TSB	TSB % Change
2028-2031 Portfolio						
Resource Acquisition ³	\$530,158	\$530,158	-	\$835,473	\$882,748	5.66%
Market Support ^{3,2}	\$280,551	\$260,516	(7.14%)	\$38,224	\$38,788	1.47%
Equity Segment ³	\$12,826	\$12,826	-	-	-	-
Evaluation, Measurement & Verification ⁴	\$52,442	\$52,442	-	-	-	-
ED Portfolio Oversight	\$1,990	\$1,990	-	-	-	-
OBFL Loan Pool & CHEEF ²	\$40,000	\$60,035	50.09%	-	-	-
Total Portfolio Excluding C&S	\$917,968	\$917,968	-	\$873,698	\$921,536	5.48%
Codes & Standards (C&S)	\$79,246	\$79,246	-	\$3,179,001	\$3,179,001	-
Total Portfolio Including C&S	\$997,214	\$997,214	-	\$4,052,699	\$4,100,538	1.18%
2032-2035 Portfolio						
Resource Acquisition ³	\$448,081	\$448,081	-	\$755,093	\$798,342	5.73%
Market Support ^{3,2}	\$309,431	\$286,927	(7.27%)	\$46,491	\$47,114	1.34%
Equity Segment ³	\$13,647	\$13,647	-	-	-	-
Evaluation, Measurement & Verification ⁴	\$53,820	\$53,820	-	-	-	-
ED Portfolio Oversight	\$1,990	\$1,990	-	-	-	-
OBFL Loan Pool & CHEEF ²	\$40,000	\$62,505	56.26%	-	-	-
Total Portfolio Excluding C&S	\$866,969	\$866,969	-	\$801,584	\$845,457	5.47%
Codes & Standards (C&S)	\$86,722	\$86,722	-	\$3,291,557	\$3,291,557	-
Total Portfolio Including C&S	\$953,691	\$953,691	-	\$4,093,141	\$4,137,013	1.07%
2028-2035 Total						
Resource Acquisition ³	\$978,239	\$978,239	-	\$1,590,566	\$1,681,090	5.69%
Market Support ^{3,2}	\$589,983	\$547,443	(7.21%)	\$84,716	\$85,902	1.40%
Equity Segment ³	\$26,473	\$26,473	-	-	-	-
Evaluation, Measurement & Verification ⁴	\$106,262	\$106,262	-	-	-	-
ED Portfolio Oversight	\$3,981	\$3,981	-	-	-	-
OBFL Loan Pool & CHEEF ²	\$80,000	\$122,539	53.17%	-	-	-
Total Portfolio Excluding C&S	\$1,784,937	\$1,784,937	-	\$1,675,282	\$1,766,993	5.47%
Codes & Standards (C&S)	\$165,967	\$165,967	-	\$6,470,558	\$6,470,558	-
Total Portfolio Including C&S	\$1,950,904	\$1,950,904	-	\$8,145,840	\$8,237,551	1.13%

1. Does not include REN/CCA budgets from SCE's territory

2. OBFL Loan Pool includes forecast new loans to be funded through current balance of unspent funds and loan repayments. Amount also includes fund for California Hub for Energy Efficiency Financing Program (CHEEF) which is outside of Energy Efficiency portfolio and part of the Clean Energy Financing (D.23-08-026)

3. Portfolio Support budget is included in Segment Budgets, excluding EM&V, based on the relative % for each segment

4. EM&V amounts include REN portions of ED EM&V. Amount based on REN forecasts supplied to SCE as of 3/5/26

Table II-2 summarizes the effect of the revised portfolio forecasts on SCE's cost-effectiveness results for the 2028–2031 period. The table compares the original and revised Total Resource Cost values and presents the resulting percentage changes in the applicable cost-effectiveness metrics by portfolio segment. Overall, SCE forecasts achieving a TRC ratio of 1.26 in the Resource Acquisition segment of the portfolio, which is an increase from SCE's prior forecast of a 1.20 TRC for the same segment.

Table II-2
Summary of Cost Effectiveness Impacts

Segment	Original TRC	Revised TRC	TRC % Change	PAC % Change	RIM % Change	SCT-Base % Change	SCT-High % Change
2028-2031 Portfolio							
Resource Acquisition	1.20	1.26	5.50%	5.44%	5.27%	(2.15%)	(2.79%)
Market Support	0.17	0.18	5.22%	5.59%	4.71%	(2.29%)	1.24%
Equity	0.00	0.00	-	-	-	-	-
EM&V	0.00	0.00	-	-	-	-	-
Total Portfolio Excluding C&S	0.86	0.92	6.38%	6.50%	5.87%	1.89%	1.54%
Codes & Standards (C&S)	1.74	1.74	-	-	-	-	-
Total Portfolio Including C&S	1.43	1.45	1.49%	2.08%	1.28%	(0.11%)	(0.24%)

III.

SUMMARY AND LOCATION OF SUPPLEMENTAL FILING UPDATES

Table III-3 identifies the location of the amended testimony, program card, and supporting Excel tables affected by the corrections and updates included in this supplemental filing. For each revision, the table provides the applicable document, exhibit or chapter, page or tab location in the amended testimony, and a summary of the change.

Table III-3
Summary of Testimony Update Locations

Document (Testimony or Excel)	Exhibit	Chapter	Page/Sheet	Table, Figure, or Line Number	Summary of Change
Testimony	SCE-01A	I	Page 1	Line 15	Update TSB value
Testimony	SCE-01A	I	Page 1	Line 16	Update % of Goal Achievement
Testimony	SCE-01A	I	Page 1	Line 17	Update CO2 Emission Value
Testimony	SCE-01A	I	Page 1	Line 18	Update TRC Value
Testimony	SCE-01A	II	Page 11	Table II-1	Update of Total Portfolio Budget & Market Support Segment Budgets
Testimony	SCE-01A	II	Page 12	Table II-2	Update TSB, TRC, PAC, RIM, SCT and CO2 values
Testimony	SCE-01A	II	Page 12	Table II-3	Update of Total Portfolio Budget & Market Support Segment Budgets
Testimony	SCE-01A	II	Page 13	Table II-4	Update TSB & % of Goal values
Testimony	SCE-01A	VI	Page 14	Table II-6	Updated Budgets & 3P & SW % values
Testimony	SCE-01A	V	Page 66	Table V-8 Solicitation Schedule	Higher Ed v2 and Public Sector v2 solicitation order was swapped. Public Sector delayed by 1 month. Only final piece of Public Sector shows up top in 2028. Previous graphic showed Higher Ed.
Testimony	SCE-01A	V	Page 66	Table V-8 Solicitation Schedule	Agriculture/Industrial start was delayed from 2026 to 2027 calendar year. Now the final piece show up at top of chart in 2028.
Testimony	SCE-01A	V	Page 66	Table V-8 Solicitation Schedule	Strategic Energy Management v2 is now an optional/gap-filling solicitation. Dependent upon whether or not we contract with SEM offers in Ag/Industrial and Commercial v2 solicitations (potential for 6+ year contracts).
Testimony	SCE-01A	V	Page 66	Table V-8 Solicitation Schedule	Ag/Industrial v2 is now an optional/gap filling solicitation. Also moved from September to December 2031 launch. Dependent upon whether or not we contract with SEM offers in Ag/Industrial solicitation (potential for 6+ year contracts).
Testimony	SCE-01A	V	Page 66	Table V-8 Solicitation Schedule	Higher Ed V3 and Public Sector v3 swapped to match swapping of v2. Matches swapped order for the v2 of each.
Testimony	SCE-01A	VI	Page 78	Table VI-11	Update Commercial & Total Portfolio Budgets
Testimony	SCE-01A	X	Page 123	X-15	Update SCE PEEBA & EEPBA Budget Numbers
Testimony	SCE-01A	X	Page 123	X-16	Update Table to include removal of CEEF Budget Recovery
Testimony	SCE-01A	X	Page 123	Line 8	Update EE Program Recovery values
Testimony	SCE-01A	X	Page 123	Line 9	Update EE Financing Program Recovery values
Testimony	SCE-01A	X	Page 125	X-17	Update SCE PEEBA & EEPBA Budget Numbers
Program Cards	SCE-02A	Residential Sector	Customer Home Engagement for Energy Reduction (CHEER) Program (Pg. 3)	TSB, TRC, PAC	Revised TSB, TRC and PAC
Program Cards	SCE-02A	Residential Sector	Multifamily Residential Direct Install (MFRDI) Program (Pg.7)	TSB, TRC, PAC	Revised TSB, TRC, PAC
Program Cards	SCE-02A	Residential Sector	Residential Energy Solutions (RES) Program (Pg. 8-9)	TSB, TRC, PAC	Revised TSB, TRC, PAC
Program Cards	SCE-02A	Commercial Sector	Commercial Energy Reduction Initiative (CERI) (Pg.14-15)	TSB, TRC, PAC	Revised TSB, TRC, PAC
Program Cards	SCE-02A	Commercial Sector	Comprehensive Refrigeration Energy Savings and Training (CREST) (Pg. 16)	TSB, TRC, PAC	Revised TSB, TRC, PAC
Program Cards	SCE-02A	Industrial Sector	Industrial Incentive Solutions (IIS) (Pg. 26-27)	TSB, TRC, PAC	Revised TSB, TRC, PAC
Program Cards	SCE-02A	Cross-Cutting Sector - Finance	New Finance Offerings (NFOs) (Pg. 67)	Program ID and Program Name	Revised Program ID and Program Name
Program Cards	SCE-02A	Cross-Cutting Sector - Finance	New Finance Offerings (NFOs) Credit Enhancements (Pg. 69)	Program ID and Program Name	Revised Program ID and Program Name, and cross-reference program IDs
Program Cards	SCE-02A	Cross-Cutting Sector - Finance	On-Bill Financing (OBF) (Pg. 71)	Program ID	Revised Program ID
Program Cards	SCE-02A	Cross-Cutting Sector - Finance	On-Bill Financing (OBF) Loan Pool (Pg. 73)	Program ID	Revised Program ID
Excel	SCE Workbook Uploaded to CEDARS	n/a	n/a	0 - Validations	Updated budget validations to exclude CEEF programs from the Energy Efficiency portfolio comparison.
Excel	SCE-04A and Uploaded to CEDARS	n/a	Pages 9-10	4.1 - Program Budget 2028-2031	Updated program budgets and CEDARS-derived TSB, TRC, PAC, RIM, SCT-Base, and SCT-High values
Excel	SCE-04A and Uploaded to CEDARS	n/a	Page 11	4.2 - Sector Seg. Budget 2032-2035	Updated 2032-2035 sector and segment budget and TSB forecasts
Excel	SCE-04A and Uploaded to CEDARS	n/a	Page 12	4.3 - TSB and C&S Targets	Updated annual TSB forecasts
Excel	SCE-04A and Uploaded to CEDARS	n/a	Page 15	8 - Cap & Target	Updated OBF treatment: the loan pool funds forecast loans using unspent balances and loan repayments; CEEF programs are excluded from the Energy Efficiency portfolio because they are part of Clean Energy Financing under D.23-08-026.
Excel	SCE-04A and Uploaded to CEDARS	n/a	Page 20	11 - Program Card	Updated 2028-2031 program TSB, annual budgets, TRC, PAC to align with Tab 4.1 and approved program changes.

1 IV.

2 **RESPONSES TO ALJ RULING SUPPLEMENTAL QUESTIONS**

3 **A. Does your business plan application consider the impact of the California Air Resources**
4 **Board's (CARB) potential new rules on Clean Space and Water Heater Standards, or other**
5 **regional standards? If not, how would your business plan application need to be adjusted if**
6 **CARB's current proposal is adopted, effective in 2030?**

7 As required by the Commission, SCE's Application reflects the assumptions incorporated in the
8 Commission's adopted 2025 Potential and Goals (P&G) study used to develop the 2028-2031 portfolio.
9 The P&G study assumed that CARB would establish zero-emission mandates for electric water and
10 space heating beginning in 2030. That assumption resulted in a significant reduction in the identified
11 potential for Fuel Substitution measures. SCE's Business Plan was developed to meet the goal derived
12 from the 2025 P&G study, including proportional reductions in the requested budget for 2030 and 2031,
13 corresponding to the expected reductions in goal.

14 SCE's Application, filed in March 2026, did not evaluate the updated Zero-Emission Space and
15 Water Heater Standards scenarios, which were first presented during CARB's public workshop on
16 December 11, 2025, and have not yet been adopted. Notably, the proposed updated rules, if adopted,
17 would no longer ban emissive appliances. Instead, the proposed rules would adopt sales targets of
18 emissive appliances with a yet-undefined penalty towards manufacturers if zero-emission appliance
19 sales targets are not met annually. CARB has yet to release draft regulation language in support of the
20 Clean Space and Water Heater Standards.

21 If CARB adopts one of its proposed scenarios and the resulting scenario becomes effective
22 before the end of the program cycle (2028-2031), SCE recommends that the new standards' impacts on
23 the investor-owned utilities' (IOUs') annual EE goals should be evaluated with an updated P&G study.
24 The 2025 P&G study's reduction in Fuel Substitution potential would likely be reversed completely as
25 gas appliances could continue to be installed in California. Presuming these gas measures remain cost-
26 effective in 2030 and 2031, the resulting increase in Fuel Substitution potential would likely translate to

1 higher EE goals. Higher EE goals would likely require higher budget authorizations and a different mix
2 of programs than those proposed by PAs in their EE Business Plans.

3 When new standards are adopted, SCE recommends that the Commission evaluate potential
4 adjustments to EE portfolios, including:

- 5 • Updates to portfolio forecasts and savings estimates to reflect revised achievable potential;
- 6 • Revisions to portfolio composition and delivery strategies to align with updated market
7 conditions and regulatory requirements; and
- 8 • Adjustments to portfolio funding levels based on changes in achievable and cost-effective
9 energy savings opportunities.

10 Because the final CARB standards and their associated market, regulatory, and technical impacts
11 have not been determined, the PAs cannot yet identify the specific EE portfolio adjustments that may
12 ultimately be warranted. Any future modifications to forecasted savings and/or necessary EE budget
13 funding would depend on the final rules CARB actually adopts and the subsequent results of an updated
14 P&G study and resultant goals. At that time, the PAs should be given an opportunity to update their
15 forecasts and budget requests. If the P&G potential increases due to future CARB rules and the
16 Commission's adopts higher EE goals, the Commission should establish a process, ideally through a
17 Tier 3 Advice Letter, to revise budget authorizations for the 2028-2031 program cycle as necessary to
18 account for such increases.

19 **B. Provide a third-party solicitation schedule and timeline from 2028 to 2031. Use the**
20 **solicitation schedule posted to the California Energy Efficiency Coordinating Committee**
21 **website, available at <https://www.caeccc.org/market-rateeee-r25-04-101>, for reference and**
22 **required fields.**

23 Table IV-4 below shows SCE's amended solicitation schedule for 2028-2031. This table replaces
24 Table V-8 in SCE's original testimony (Ex. 1). SCE has made minor changes to the schedule, such as
25 revisions to solicitation sequencing, adjustments to the timing of Agriculture/Industrial solicitations,
26 designation of Strategic Energy Management v2 and Agriculture/Industrial v2 as optional gap-filling
27 solicitations, and a revision to the Agriculture/Industrial v2 solicitation launch date.

Table IV-4
Solicitation Schedule for 2028-2031

Segment	Year		2028												2029												2030												2031																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
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V.

ADDITIONAL PORTFOLIO FUNDING CLASSIFICATION UPDATE

On September 9, 2026, California Alternative Energy and Advanced Transportation Financing Authority (CAEATFA) submitted a letter seeking to extend the California Hub for Energy Efficiency Financing (CHEEF) GoGreen Financing programs through 2035, with a proposed cumulative budget of over \$325 million. In reviewing this request, SCE reviewed its treatment of CHEEF funding in its EE portfolio budget. In its initial testimony and budget tables, SCE included the CHEEF budget in its “EE Programs” category, rather than the “EE Financing Programs” category. Because CHEEF expansion was authorized as part of the Clean Energy Financing Rulemaking (R.) 20-08-022, SCE has revised its testimony, p. 126, to reflect a transfer of \$9 million from the EE programs category to the EE Financing Programs category. This treatment of CHEEF’s budget set off from SCE’s core EE portfolio is consistent with the other IOUs’ treatment of CHEEF funding. Moreover, this correction has no impact on SCE’s overall budget request, and, consistent with D.23-08-026, the CHEEF funds will continue to be requested and collected through the EE application and balancing account, respectively, unless and until otherwise ordered by the Commission.

Appendix A

Witness Qualifications

**DECLARATION SUPPORTING WITNESS QUALIFICATIONS AND
PREPARED TESTIMONY OF ELIZABETH GOMEZ**

I, Elizabeth Gomez, declare and state:

1. My business address is 8631 Rush St., Rosemead, CA 91770.

2. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.

3. I am a Principal Manager within the Air and Climate Regulatory Affairs organizational unit of SCE. Regulatory Affairs provides case management and policy support for matters before regulatory agencies such as the California Public Utilities Commission. More specifically, the Air and Climate group provides policy support for matters related to building decarbonizations such as Energy Efficiency.

4. I have a Bachelor of Arts in Political Science and Sociology from the University of California, Irvine, and a Master of Arts in Public Policy from Pepperdine University.

5. The purpose of my testimony in this proceeding is to sponsor the portions of Exhibit SCE-06: *Supplemental Testimony of Southern California Edison Company in Support of its Application for Approval of its 2028-2031 Portfolio Plan and 2032-2035 Business Plan*, as identified in the Table of Contents thereto.

6. This material was prepared by me or under my supervision.

7. Insofar as the material is factual in nature, I believe it to be true and correct.

8. Insofar as this material is in the nature of opinion or judgment, it represents my best judgment.

I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.

Executed on this 30th day of September, 2026, at Rosemead, California.

/s/Elizabeth Gomez
Elizabeth Gomez

1 **DECLARATION SUPPORTING WITNESS QUALIFICATIONS AND**
2 **PREPARED TESTIMONY OF ERICA KEATING**

3 I, Erica Keating, declare and state as follows:

4 1. My business office is located at: Southern California Edison Company, 2244
5 Walnut Grove Avenue, Rosemead, California 91770.

6 2. I have personal knowledge of the facts and representations herein and, if called
7 upon to testify, could and would do so, except for those facts expressly stated to be based upon
8 information and belief, and as to those matters, I believe them to be true.

9 3. I am the Principal Manager of the Energy Efficiency Portfolio & Solicitations team
10 within the Customer Solutions department at SCE. I am responsible for all Energy Efficiency
11 programs including the procurement and operational support activities associated with these
12 programs.

13 4. I hold a Bachelor of Arts Degree in Communications with minors in History and
14 German from California State University at Fullerton. I completed a graduate degree from
15 California State University at Long Beach where I received a Master of Public Administration. I
16 began my career in 2001 at the city of Rancho Cucamonga as the administrator of the city's
17 capital improvement program, as well as the operations manager for the City's municipal utility.
18 In 2010, I started with SCE in the Energy Procurement and Management Department running the
19 utility's resource adequacy capacity portfolio and RFPs for wholesale energy products. In 2016, I
20 transitioned to the Customer Programs Division and I have been leading customer programs ever
21 since including customer generation, demand response and most recently the energy efficiency
22 portfolio and solicitations teams.

23 5. The purpose of my testimony in this proceeding is to sponsor the portions of
24 Exhibit *SCE-06: Supplemental Testimony of Southern California Edison Company in Support of*
25 *its Application for Approval of its 2028-2031 Portfolio Plan and 2032-2035 Business Plan*, as
26 identified in the Table of Contents thereto.

27 6. This material was prepared by me or under my supervision.

7. Insofar as the material is factual in nature, I believe it to be true and correct.

8. Insofar as this material is in the nature of opinion or judgment, it represents my best judgment.

I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.

Executed on this 30th day of September, 2026, at Rosemead, California.

/s/ Erica Keating
Erica Keating