

August 13, 2004

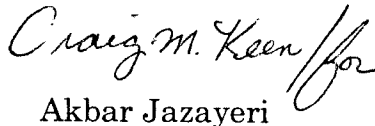
Jerry Royer
California Public Utilities Commission
Energy Division, Room 4004
505 Van Ness Avenue
San Francisco, California 94102

Re: Reply Comments of Southern California Edison Company
on Draft Resolution E-3885 on SCE Advice Letter 1806-E

Dear Mr. Royer:

Attached please find Southern California Edison Company's (SCE's) Reply
Comments on Draft Resolution E-3885 of the Energy Division.

Very truly yours,


Akbar Jazayeri

AJ:LC:mm:E-3885 Reply Comments Cover Letter.doc

cc: Attached Service List
President Michael Peevy
Commissioner Geoffrey Brown
Commissioner Susan Kennedy
Commissioner Loretta Lynch
Commissioner Carl Wood
Paul Clanon/Director, Energy Division
Don Lafrenz, Energy Division
Sarvjit Randhawa, Energy Division

REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY
(U 338-E) ON DRAFT RESOLUTION E-3885 IN
SCE ADVICE LETTER 1806-E/SSR

I.

INTRODUCTION

Pursuant to Rule 77 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure and Section 11(g) of the Public Utilities Code, Southern California Edison Company (SCE) submits these Reply Comments on Draft Resolution E-3885 on SCE's Advice Letter 1806-E, dated June 16, 2004.

II.

COMMENTS

A. Background

The Community Action Partnership Riverside County (CAP Riverside) filed comments on August 6, 2004, addressing the Draft Resolution E-3885. SCE has reviewed the comments filed by CAP Riverside, and would like to briefly comment on the recommendations proposed by CAP Riverside.

B. SCE's Cool Centers

SCE appreciates the interest and participation in this proceeding by CAP Riverside; however, it is important that the Commission be fully informed that SCE's Cool Center Program (Cool Centers) is separate and distinct from the cool centers adopted by the Riverside County Board of Supervisors as part of Riverside County's Summer Crisis Response Plan.

SCE's Cool Center Program is set up and operated pursuant to SCE's Scope of Work¹ and Operational Plans,² and is not connected nor operated through Riverside County.

C. SCE Cool Center Operations

CAP Riverside operates its cool centers as a Summer Crisis Response and, therefore, a daily temperature trigger is appropriate for their emergency operation. However, SCE's Cool Centers are operated as a service to assist low-income and senior residential customers, to provide a respite from the heat and to help them lower their utility bills. It would greatly undermine the operation and utilization of SCE's Cool Centers if they were only open on specific days triggered by excessive temperature occurrences.

Such a form of operation would also greatly add to the cost of the Cool Center Program due to the constant opening and closing of the Cool Centers. Finally, temperature sensitive operations could damage the partnership SCE has developed with the operators of its Cool Centers. Therefore, SCE believes its proposed dates of operation for its Cool Center Program best serve the targeted customers.

D. Cool Center Funding

SCE's funding of the Cool Center Program is identified in the Operational Plans,³ and already includes funding the areas recommended by CAP Riverside.

E. Cool Center Coordination

SCE works closely with its Cool Center operators and in fact provides each a Scope of Work⁴ detailing how the Cool Centers should be operated.

¹ Attachment B to the Draft Resolution E-3885, noticed July 20, 2004.

² Attachment C to the Draft Resolution E-3885, noticed July 20, 2004.

³ Attachment C to the Draft Resolution E-3885, noticed July 20, 2004.

⁴ Attachment B to the Draft Resolution E-3885, noticed July 20, 2004.

SCE does not typically coordinate with the City and County of Riverside nor their cool centers. However, SCE will provide the CAP Riverside Energy Taskforce a list of all SCE's Cool Centers in Riverside County as well as their anticipated time and dates of operation. Riverside County's cool centers are for emergency relief as part of their Summer Crisis Response Plan, not for energy conservation and customer assistance. Further, it is not within the scope of SCE's program to intervene in the Riverside County's cool centers, many of which are outside SCE's service territory and provide assistance to non-SCE customers. SCE will offer to make available to Riverside County, energy efficiency and low-income assistance information for dissemination at their cool centers.

F. Survey Data

SCE is preparing a survey plan which will include SCE's Cool Center participants. The survey contains many of the questions raised by CAP Riverside. SCE intends on filing the survey results with the Commission and believes the survey results will be available to the public.

III.

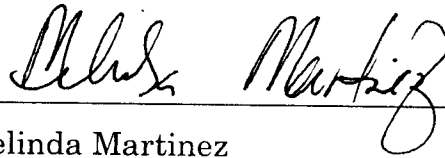
CONCLUSION

SCE would thank the Commission for considering these reply comments. SCE respectfully requests the Commission adopt Resolution E-3885 with SCE's proposed modifications.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedures, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) Reply Comments on Draft Resolution E-3885 concerning Advice 1806-E, to all parties of record in R.04-01-006.

Executed this 13th day of August 2004, at Rosemead, California.



Melinda Martinez
Business Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

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