

**UNITED STATES OF
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Notice of Information Collections and)	
And Request for Comments)	Docket No. IC25-7-000
)	

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY

Southern California Edison Company (SCE) is submitting these comments in response to the above-referenced Notice of Information Collection (NOIC) which the Federal Energy Regulatory Commission (FERC or Commission) issued on February 3, 2025, and published at 90 Fed. Reg. 9151 on February 27, 2025. In the NOIC, the Commission is soliciting public comment on the requirements and information collection burden associated with Forms No. 1, 1-F, and 3-Q. Specifically, comments are invited on: (1) whether the collections of information are necessary for the proper performance of the functions of the Commission, including whether the information will have practical utility; (2) the accuracy of the agency’s estimates of the burden and the cost of the collections of information, including the validity of the methodology and assumptions used; (3) ways to enhance the quality, utility, and clarity of the information collections; and (4) ways to minimize the burden of the collections of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.

In summary, SCE recommends that the filing requirements of the Form No. 3-Q be eliminated. Alternatively, the filing requirements should be reduced to a basic set of financial statements only, not including notes to the financials (Comparative Balance Sheet, Statement of Income and Retained Earnings, Statement of Cash Flows, and Statement of Other Comprehensive Income). SCE has no objection to the renewal of Form No. 1. Responses to each comment request regarding Form No. 3-Q are provided below.

Whether the collections of information are necessary for the proper performance of the functions of the Commission, including whether the information will have practical utility

The FERC Form No. 1 serves many purposes including to establish our FERC Formula Rate and as a foundation for our CPUC General Rate Case which impacts customer rates. The FERC No. 3Q, however, is not used internally for any purpose and we are unaware of external uses by the CPUC, the FERC, or other users as we are not aware of any specific inquiries related to the Form No. 3Q information. We do not believe that quarterly information is necessarily indicative of annual information and, is therefore, not necessary for someone to understand the overall FERC No. 1 information provided annually.

The accuracy of the agency's estimates of the burden and cost of the collections of information, including the validity of the methodology and assumptions used

SCE estimates that over 125 employees are involved in providing information for each FERC No. 3Q filing. SCE spends approximately 300 hours between the preparers, reviewers and certifiers involvement in each FERC No. 3Q. This results in approximately 900 hours annually for just the three quarterly filings which results in a

large cost for the company to file these reports. Furthermore, it is not clear if this information is regularly accessed by the FERC or any other external users. The cost of producing the three FERC quarterly filings during the year is more than the cost of the FERC Form No. 1, and while there is a clear benefit to producing the Form No. 1 (e.g. supporting rate recovery through Formula Rates), SCE is unaware of any benefits to offset the costs of the FERC No. 3Q.

Ways to enhance the quality, utility, and clarity of the information collections

SCE believes that the FERC Form No. 1 data has a clear purpose supporting rate recovery. SCE is not aware of any users who may be regularly reviewing the FERC No. 3Q quarterly reports. Further, SCE notes that the required XBRL format has added additional burden without a clear linkage to any benefit by users.

Ways to minimize the burden of the collections of information on those who are to respond, including the use of automated collection techniques or other forms of information technology

If the FERC believes the information requested in Form No. 3Q is still necessary, SCE recommends reducing the quarterly data to only include the information that the FERC is using regularly. SCE would be able to efficiently produce a comparative balance sheet, statement of income and retained earnings, statement of cash flows, and statement of other comprehensive income on a quarterly basis and recommends that only this financial statement information be required quarterly, if necessary for the FERC. This information reflects the Company's general ledger using the FERC uniform system of accounts which is prepared through our recurring accounting processes. These statements would provide users with an update of SCE's financial results but would not

include the additional data that is burdensome to collect which does not appear to be reviewed quarterly. In addition, the important changes information does not appear to be relevant to support the companies financial position at the end of quarter.

Conclusion

SCE appreciates the opportunity to provide these comments. We believe that the Form No. 1 already collects substantial information for the FERC Staff to use to perform their responsibilities that we are aware of and for our customers to use in evaluating rates. We believe that the Form No. 3-Q is not adding additional value but instead is an administrative burden that is costing customers. If the Commission finds that the Form No. 3-Q information is valuable to the FERC Staff we strongly encourage the Commission to determine if it could be paired down to still meet the needs of the Commission while balancing the costs associated with this.

If the Commission needs additional information or has any questions, please contact Tricia Young, Assistant Controller, at (626) 302-4558 or tricia.young@sce.com.

Thank you for your consideration of our responses.

Respectfully submitted,

/s/ Kara Ryan

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