BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) or Authorized Cost of Capital for Utility Operations for 2008	)))	A.07-05-003 (Filed May 8, 2007)
And Related Proceedings.	)))	A.07-05-007 A.07-05-008

SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) AND DIVISION OF RATEPAYER ADVOCATES JOINT PETITION TO MODIFY DECISION 08-05-035

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Dated: **August 7, 2009**

SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) AND DIVISION OF RATEPAYER ADVOCATES JOINT PETITION TO MODIFY

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I.

INTRODUCTION

Pursuant to Rule 16.4 of the Rules of Practice and Procedure of the California Public Utilities Commission ("CPUC"), Southern California Edison Company ("SCE") and the CPUC Division of Ratepayer Advocates ("DRA") respectfully petition the Commission to modify Decision 08-05-035, which established a multi-year Cost of Capital Mechanism ("CCM") to govern SCE's authorized cost of capital beginning with the 2009 test year.[1] In particular, SCE and DRA seek to avoid SCE implementing a cost of capital increase for 2010, should SCE be required to submit an advice letter in October 2009 to increase its authorized cost of capital beginning on January 1, 2010. SCE and DRA also request that SCE be relieved of the requirement that SCE file an application on April 20, 2010 to establish its authorized cost of capital for test year 2011.

The modifications to D.08-05-035 that SCE and DRA propose herein will benefit ratepayers by forgoing an increase in SCE's authorized cost of capital for 2010 and forgoing the attendant revenue requirement increase and will benefit SCE's equity investors by stabilizing SCE's authorized return on equity through 2010 and possibly through 2012, if utility bond interest rates remain stable.

[1] Pursuant to Commission Rule 1.8(d), counsel for DRA has authorized SCE to file this petition on its behalf.

II.

COST OF CAPITAL MECHANISM

In D.08-05-035 the Commission established the CCM to avoid the need for three of California's large energy utilities to file annual cost of capital applications.[2] In place of the annual application, D.08-05-035 specified that the three utilities would file applications every three years, beginning with 2010 (to set authorized cost of capital for 2011). In the intervening years, the utilities' cost of capital would be governed by an adjustment tied to an interest rate index that varies between utilities based on each utility's corporate credit rating.[3]

In response to D.08-05-035, SCE filed Advice 2264-E on August 12, 2008. Advice 2264-E, which was approved with an effective date of May 29, 2008, created SCE's Preliminary Statement CCC (part of SCE's tariffs) to specify the precise details of how the CCM would work for SCE. (A copy of Preliminary Statement CCC is attached as Appendix A to this petition.)

In relevant part, SCE's CCM operates as follows:

1. The Interest Rate Index is the 12-month average of the Moody's Long-Term Bond Yield for Baa Utilities ("Moody's Baa Bond Rate") ending in September.[4]

2. The initial Trigger Value is 6.26 percent.[5] (This is also the current Trigger Value.)

3. In October of each year, the current value of the Interest Rate Index is compared with the current Trigger Value. If the difference between the Interest Rate Index and the Trigger Value exceeds one percent (100 basis points) in absolute value, then:[6]

    a. The authorized return on equity is changed by one-half of the difference as of January 1 of the following year,[7] and

    b. The authorized costs of long-term debt and preferred equity will be adjusted to the latest forecast values for the following year, also taking effect on January 1 of the following year.[8]

4. SCE is to file a Tier 2 advice letter on October 15th to implement the automatic cost of capital adjustment.[9]

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[2] D.08-05-035, pp. 1, 5-7, 15-16.

[3] D.08-05-035, pp. 12-13, 15-16, Conclusions of Law 10-11, Ordering Paragraphs 1-2.

[4] Preliminary Statement CCC, section 3.b.

[5] Preliminary Statement CCC, section 3.c. The 6.26 percent value was the interest rate index as of September 2007. D.08-05-035 contains incorrect values of 6.20 percent in Finding of Fact 1 and 6.21 percent in Conclusion of Law 12. It correctly cites the 6.26 value on page 13 of the body of the decision.

[6] Preliminary Statement CCC, section 4.

[7] Preliminary Statement CCC, section 4.a.

[8] Preliminary Statement CCC, section 4.b.

III.

SCE'S PROJECTED COST OF CAPITAL FOR 2010

SCE has been tracking the behavior of the 12-month average of the Moody's Baa Bond Rate. Based on the recent history of the Rate and SCE's projections for the near future, SCE projects that the Interest Rate Index at the beginning of October 2009 will be 7.69 percent.[10] According to the CCM, SCE's 2010 authorized return on equity would increase by 0.72 percent (one-half of the difference between the Interest Rate Index of 7.69 percent and the current Trigger Value of 6.26 percent). For 2010 then, SCE's authorized return on equity would be 12.22 percent. SCE also expects that the latest forecast values of its embedded costs of long-term debt and preferred stock would be higher than current authorized values. SCE's authorized embedded cost of long-term debt would increase from 6.22% to 6.25% and SCE's authorized embedded cost of preferred equity would increase from 6.01% to 6.51%. SCE projects that the projected increases in its authorized cost of capital for 2010 would increase SCE's 2010 revenue requirement by $92 million.

IV.

SCE AND DRA WISH TO FORGO AN SCE COST OF CAPITAL INCREASE, BUT EXTEND THE TERM OF THE MECHANISM

The projected increase in the Interest Rate Index for 2009 is largely the result of dramatic increases in the cost of utility debt that began in September 2008 after the bankruptcy of Lehman Brothers and continued into 2009. These interest rate increases have largely subsided, and the cost of utility debt has returned to levels that prevailed in the summer of 2008 before the Lehman bankruptcy. In terms of the operation of the CCM, then, the last twelve months are a transitory period that has subsided and not the precursor of extended higher costs for utility debt financings. However, equity markets, including those for utility equity, have not returned to normalcy and are still showing significant continued risk aversion by investors.

In addition, SCE and DRA are well aware that the last twelve months have been a trying economic time for many of SCE's customers and SCE and DRA believe that it is in the interest of SCE's customers for SCE to forgo a transitory increase in its authorized cost of capital that could be reversed in a year's time as financial markets continue to stabilize.

Continued from the previous page

9 Preliminary Statement CCC, section 4.

10 Per Rule 16.4(b), allegations of new or changed facts are supported by the attached declaration.

Therefore, SCE and DRA jointly petition the Commission to modify D.08-05-035 to accomplish the following objectives:

1. SCE's projected cost of capital increase for 2010 should be avoided.

2. SCE should be excused from filing a cost of capital application in April 2010 for a 2011 test year. The next cost of capital application should instead be in April 2012 for a 2013 test year. The CCM should be extended to govern SCE's cost of capital for 2011 and 2012 with no change to its current structure.

The Moody's Baa Bond Rate has returned to the plus-or-minus one percent range around the Trigger Value that results in no change to SCE's authorized cost of capital. Because of increased risk aversion by utility equity investors, there is value in providing SCE's investors with a stable authorized return in the current uncertain economic environment. For 2010, it is reasonable to forgo the projected increase in authorized return. For 2011 and 2012, it is reasonable to continue the current authorized return, unless the future operation of the CCM indicates that a change should be made.[11]

At this time, it is a virtual certainty that the CCM will require SCE to submit an advice letter in October 2009 to increase its authorized cost of capital beginning on January 1, 2010. If the Commission approves this petition by December 31, 2009, SCE will withdraw the advice letter and there will be no change to SCE's authorized cost of capital for 2010.

According to Rule 16.4(d), a petition for modification must be filed and served within one year of the effective date of the decision at issue unless it could not have been presented during the one year period. The effective date of D.08-05-035 was May 29, 2008. On May 28, 2009, Moody's Baa Bond Rate was 7.83 percent. Since the end of May 2009, the Moody's Baa Bond Rate has fallen to below 7 percent, which gives assurance that the higher interest rates experienced since September 2008 are transitory and not permanent. On the one year anniversary of D.08-05-035, that assurance did not exist. Hence, SCE and DRA could not have filed this petition within the one year period indicated by Rule 16.4(d).

V.

SPECIFIC CHANGES PROPOSED TO D.08-05-035

Rule 16.4(b) specifies that this petition "must propose specific wording to carry out all requested modifications" to D.08-05-035. The specific wording changes are as follows:

---

[11] If in October 2010, for example, the CCM indicates an increase in cost of capital, then there will have been two years of sustained interest rates above the level that triggers an increase.

On page 1, change the first two sentences of the first paragraph as indicated:

> This decision establishes a ~~uniform~~ multi-year cost of capital mechanism (CCM) for Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E) and Pacific Gas and Electric Company (PG&E). SCE's next full cost of capital application is to be filed on April 20, 2012 for a test year 2013 return on equity. SDG&E's and PG&E's next full cost of capital application is to be filed on April 20, 2010 for a test year 2011 returns on equity (ROE).

On page 5, change the last paragraph as indicated:

> We find it appropriate to establish a ~~uniform~~ CCM for SCE, PG&E, and SDG&E that balances the interests of SCE, SDG&E and PG&E's shareholders and ratepayers while simplifying and reducing ROE proceedings, workload requirements, and regulatory costs.

On page 7, change the first full sentence as indicated:

> ~~The utilities~~ PG&E and SDG&E should file their first complete cost of capital applications for test year 2011 on April 20, 2010. SCE should file its first complete cost of capital application for test year 2013 on April 20, 2012. (Footnote omitted.)

At the beginning of Section 5.6 on page 15, change the first three sentences as shown:

> A ~~uniform~~ CCM shall be adopted for SCE, SDG&E, and PG&E. The CCM shall be based on:
>
> a. A full cost of capital application due April 20 of every third year for the following test year. For PG&E and SDG&E, the first application will be due on April 20, 2010. For SCE, the first application will be due on April 20, 2012.

Change the beginning of Ordering Paragraph 1 on page 20 as shown:

> A ~~uniform~~ cost of capital mechanism (CCM) is adopted for Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Pacific Gas and Electric Company (PG&E). For PG&E and SDG&E, the first full cost of capital application shall be due on April 20, 2010 for test year 2011 returns on equity (ROE). For SCE, the first full cost of capital application shall be due on April 20, 2012 for test year 2013 return on equity.

Add a new sentence to the end of Ordering Paragraph 2 on page 22:

> No cost of capital change from the current authorized cost of capital shall be implemented for Southern California Edison Company (SCE) for the period of test year 2010 after the effective date of this decision.

VI.

CONCLUSION

The modifications to D.08-05-035 that SCE and DRA propose herein will benefit ratepayers by forgoing an increase in SCE's authorized cost of capital for 2010 and forgoing the attendant revenue requirement increase and will benefit SCE's equity investors by stabilizing SCE's authorized return on equity through 2010 and possibly through 2012, if utility bond interest rates remain stable. SCE and DRA request that the Commission adopt the changes proposed herein to D.08-05-035 as expeditiously as possible.

Respectfully submitted,

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August 7, 2009

Appendix A – SCE Preliminary Statement CCC

CCC. COST OF CAPITAL MECHANISM (CCM)

1. Purpose.
The purpose of the Cost of Capital Mechanism (CCM) is to adjust SCE's authorized cost of capital (return on equity, preferred stock and long-term debt rates) for changes in interest rates between cost of capital applications pursuant to D.08-05-035.

2. Applicability.
The CCM was established by Decision 08-05-035 effective May 29, 2008 and will be effective until terminated by further action of the Commission.

3. Definitions.

a. Authorized Return on Equity

The authorized return on equity for 2008 is 11.50 percent as approved in D. 07-12-049. The Authorized Return on Equity shall be equal to the preceding year's authorized Return on Equity adjusted by the Return on Equity Adjustment as described in Section 4 below. Table A sets forth the Authorized Return on Equity.

Table A Authorized Return on Equity

Year	Authorized Return on Equity
2008	11.50 percent

b. Interest Rate Index

The interest rate index is the 12-month average of the Moody's Long-Term Bond Yield for Baa Utilities ending in September. Should SCE's Standard & Poor's or Moody's corporate credit rating/issuer credit rating change, the interest rate index will be modified in the next cost of capital application as directed by Decision 08-05-035.

c. Trigger Value

The initial trigger value shall be 6.26 percent, as established by Decision 08-05-035. The trigger value will be modified as necessary by the operation of this mechanism.

Table B
Trigger Value

Year	Trigger Value
2007	6.26 percent

(Continued)

CCC. COST OF CAPITAL MECHANISM (CCM) (Continued):

3. Definitions.

d. Authorized long-term debt and preferred stock costs.

Table C
Authorized Preferred Stock and Long-term Debt Rates

Year	Authorized Preferred Stock	Authorized Long-Term Debt
2008	6.01 percent	6.22 percent

4. Automatic Cost of Capital Adjustment

In October of each year, the current value of the interest rate index shall be compared with the current trigger value. If the difference between the interest rate index and the trigger value exceeds one percent (100 basis points) in absolute value, then:

a. The authorized return on equity shall be changed by one-half of the difference and the trigger value will be reset at the current value of the interest rate index. This change will take effect on January 1 of the following year; and

b. The authorized costs of long-term debt and preferred equity will be adjusted to the latest forecast values for the following year, taking into account current embedded costs, latest projected interest rates for the following year, and latest projections of long-term debt and preferred equity to be redeemed, repurchased, and issued through the end of the following year. These changes will take effect on January 1 of the following year.

5. Review Procedures

SCE will file a Tier 2 advice letter on October 15 to implement the automatic Cost of Capital adjustment on January 1 of the following year, in accordance with Decision D. 08-05-035. SCE will set forth its updated revenue requirements in this filing.

6. Cost of Capital Applications

In accordance with Decision 08-05-035, it is anticipated that SCE will file a cost of capital application by April 20 of every third year, beginning in 2010, for the purpose of reviewing SCE's authorized cost of capital beginning on January 1 of the following year. SCE has the right to file a cost of capital application outside of this three-year process upon an extraordinary or catastrophic event that materially affects its cost of capital between applications.

Appendix B – Declaration of Paul T. Hunt, Jr.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

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DECLARATION OF PAUL T. HUNT, JR.

I, Paul T. Hunt, Jr., have personal knowledge of the facts contained herein and if called to testify under oath, could and would competently testify as follows:

1. I am employed by Southern California Edison Company ("SCE") as Manager of Regulatory Finance and Economics in the Treasurer's Department. I hold a Doctor of Philosophy degree in Economics from Stanford University. My graduate education in Economics included specialization in macroeconomics and econometrics (the application of statistics to economics). I have worked at SCE for 29 years, exclusively in the financial and regulatory affairs organizations. I have submitted testimony as an expert witness to the CPUC and the FERC. Among my job responsibilities is that of case manager for SCE's annual cost of capital filings, including the 2008 cost of capital application (A.07-05-003, et al.) In my capacity as case manager for SCE's cost of capital applications, I was responsible for overall review of SCE's testimony and pleadings and the daily management and processing of SCE's 2008 cost of capital filing. I also testified as an expert witness in A.07-05-003, et al. I am readily familiar with sources of reliable government and private information concerning published and anticipated rates of interest for government and private securities. I submit this declaration in support of SCE's and DRA's joint petition for modification of D.08-05-035. By way of its petition, SCE and DRA seek to avoid having SCE implement an increase in SCE's authorized cost of capital beginning on January 1, 2010. SCE and DRA also request that SCE be relieved of

the requirement that SCE file an application on April 20, 2010 to establish SCE's authorized cost of capital for test year 2011.

2. Data on actual values of Moody's Baa Long-Term Utility Bond Yield ("Moody's Baa Bond Rate"), as discussed in the petition were obtained by me or under my direction from the Bloomberg Financial Service, a reputable source of financial information to which SCE has subscribed for many years.

3. Projected values of Moody's Baa Bond Rate and projected values of SCE's embedded costs of long-term debt and preferred equity as set forth in the petition were calculated by me based on projections of related interest rates found in macroeconomic projections published by Global Insight in July 2009. The Commission has relied on Global Insight macroeconomic projections for many years in several contexts.

4. The projected revenue requirement change for 2010 was calculated by me based on the application of an updated cost of capital to the projected value of SCE's rate base based on the Commission's authorized revenue requirement for 2010 as set forth in D.09-03-025, SCE's 2009 General Rate Case decision.

5. I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct.

Executed August 7, 2009 at Rosemead, California.

/s/ PAUL T. HUNT, JR.
By: Paul T. Hunt, Jr.

August 7, 2009

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) AND DIVISION OF RATEPAYER ADVOCATES JOINT PETITION TO MODIFY DECISION 08-05-035 on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **7th day of August 2009**, at Rosemead, California.

/s/ CECILIA R. JONES
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Project Analyst
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