BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Application of Southern California Edison Company (U-338-E) for a Commission Finding that its Procurement-Related and Other Operations for the Record Period January 1 through December 31, 2009 Complied with its Adopted Procurement Plan; for Verification of its Entries in the Energy Resource Recovery Account and Other Regulatory Accounts; and for Recovery of $29,947 Million Recorded in Four Memorandum Accounts.

Application No. 10-04-002 (Filed April 1, 2010)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) OPPOSITION TO THE DIVISION OF RATEPAYER ADVOCATES’ MOTION FOR BIFURCATION AND CONSOLIDATION

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Dated: June 2, 2011
SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) OPPOSITION TO THE DIVISION OF RATEPAYER ADVOCATES’ MOTION FOR BIFURCATION AND CONSOLIDATION

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Application of Southern California Edison Company (U-338-E) for a Commission Finding that its Procurement-Related and Other Operations for the Record Period January 1 through December 31, 2009 Complied with its Adopted Procurement Plan; for Verification of its Entries in the Energy Resource Recovery Account and Other Regulatory Accounts; and for Recovery of $29.947 Million Recorded in Four Memorandum Accounts. Application No. 10-04-002 (Filed April 1, 2010)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) OPPOSITION TO THE DIVISION OF RATEPAYER ADVOCATES’ MOTION FOR BIFURCATION AND CONSOLIDATION

Pursuant to Rule 11.1(e) of the Commission’s Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully submits its opposition to the Division of Ratepayer Advocates’ (DRA’s) motion to bifurcate SCE’s Market Redesign and Technology Upgrade Memorandum Account (MRTUMA) from the Energy Resource Recovery Account (ERRA) Review proceeding and have it reviewed in a separate, consolidated proceeding with the MRTUMA of other investor-owned utilities (IOUs), Pacific Gas and Electric Company (PG&E) and San Diego Gas and Electric Company (SDG&E).†

† DRA has filed a motion to bifurcate in each of the IOUs’ pending ERRA Review proceedings: A.10-02-012, A.10-04-002, A.10-06-001, A.11-02-011, and A.11-04-001. SCE understands that PG&E and SDG&E will file oppositions to DRA’s motion in their respective ERRA Review proceedings.
I.

INTRODUCTION

The Commission should summarily deny DRA’s motion because a consolidated proceeding is unwarranted and would be a waste of the Commission’s time and resources. The Commission has repeatedly held that it is appropriate to review the IOUs’ MRTUMAs annually in each IOU’s ERRA Review proceeding and recently reaffirmed this conclusion in its final decision in SCE’s 2009 ERRA Review proceeding (Application (A.) 09-04-002), Decision (D.) 10-07-049. In this decision, the Commission denied DRA’s request for consolidation, rejecting the same arguments that DRA raises in its instant motion. The Commission determined that there was “little benefit” to consolidating the IOUs’ MRTU-related proceedings and “then having to determine the reasonableness of each utility’s particular circumstances.” DRA provides no argument or rationale to support a contrary conclusion.

The IOUs’ MRTUMAs are presented to the Commission annually in the ERRA Review proceeding, which provides for an ongoing review of the IOUs’ recorded costs. To protect ratepayer interests, the Commission has required the IOUs to demonstrate that their recorded costs are verifiable (i.e., incurred to implement MRTU) and incremental (i.e., not already recovered in rates). This consistent standard of review ensures that the IOUs do not double-recover their MRTU implementation costs and, contrary to DRA’s assertion, does not require the assigned administrative law judge (ALJ) to “learn about MRTU.”

While the Commission stated in D.10-07-049 that it did not “completely foreclose” consolidation because it had not seen any showings pertaining to the IOUs MRTU Release 1 costs, such showings have now been made and each IOU’s respective 2010 ERRA Review proceeding.

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2 D.10-07-049, Ordering Paragraph No. 5, p. 73 (“The [DRA’s] request that there be a consolidated proceeding for Market Redesign and Technology Upgrade costs is denied.”)
3 Id., p. 50.
4 D.09-12-021, p. 3, fn. 1.
5 DRA Motion, p. 1.
6 D.10-07-049, p. 50.
The proceeding is nearing conclusion. At this stage, it would be grossly inefficient and a waste of the Commission’s time and resources to bifurcate the MRTU portion of these proceedings and order this issue to be re-litigated in a consolidated proceeding. DRA was a party in each proceeding and has not provided any evidence to demonstrate that the IOUs’ Release 1 showings would benefit from an additional, consolidated review. DRA has therefore failed to provide the Commission with any basis to reconsider its decision.

II.

THE COMMISSION SHOULD SUMMARILY REJECT DRA’S REQUEST FOR A CONSOLIDATED MRTU PROCEEDING

A. The Commission Has Repeatedly Held That the IOUs’ MRTUMAs Are Appropriately Reviewed in Their ERRA Review Proceedings

The Commission has firmly established that it is appropriate to review the IOUs’ MRTU implementation costs in their ERRA Review proceedings. Indeed, as DRA acknowledges in its motion, the Commission has specifically required that SCE and the other IOUs seek recovery of their MRTU implementation costs via this annual filing.\(^2\) The Commission’s decision to include the MRTUMA in the ERRA Review proceeding ensures that the IOUs’ implementation costs are reviewed on an annual basis. SCE notes that the Commission regularly reviews other balancing and memorandum accounts in the ERRA Review proceeding, and in fact has specifically instructed SCE to include other non-ERRA accounts, such as the Department of Energy Litigation Memorandum Account (DOELMA) and the Project Development Division Memorandum Account (PDDMA), in the ERRA Review proceeding.\(^8\) Clearly, the Commission

\(^2\) DRA Motion, p. 2. The Commission resolutions approving review in the IOU’s ERRA Review proceedings are Resolutions E-4087 (SCE), E-4093 (PG&E), and E-4088 (SDG&E).

\(^8\) See Resolution E-3894, Finding of Fact No. 4, p. 9 and D.09-03-025, Conclusion of Law No. 29, p. 370 (citing D.06-05-016).
has concluded that this is an appropriate practice and DRA has not provided any evidence to suggest otherwise.

The Commission reaffirmed its decision last year, when it issued D.10-07-049 in SCE’s 2009 ERRA Review proceeding. In its decision, the Commission rejected DRA’s argument that “common factors driving all three IOUs’ reasonableness requests” and “inconsistencies” in the IOUs’ MRTU implementation costs warranted removing this account from SCE’s ERRA Review proceeding and instead reviewing it in a consolidated proceeding with the other IOUs:

In determining whether or not we should consolidate the evaluation of MRTU Release 1 costs for the three IOUs in a single consolidated proceeding, we considered three points. First, MRTU is the result of numerous CAISO stakeholder processes and FERC orders. We do not intend to assess the reasonableness of MRTU or the associated requirements imposed on the IOUs. Consequently, there is no need for a single comprehensive proceeding to do so.

Additionally, while the IOUs’ MRTU efforts are driven by common directives, tariff structures, and technical requirements, SCE’s assertion that the manner in which each IOU approaches the requirements can be wholly different is not disputed by DRA. Based on the available evidence, we see little benefit, at this time, in consolidating the IOUs’ MRTU related proceedings and then having to determine the reasonableness of each particular utility’s actions when considering each utility’s particular circumstances, such as resource portfolios, customer demands, reliability issues, and information systems in place prior to MRTU.

For these reasons, we will deny DRA’s request for the review of all three IOUs MRTU Release 1 costs in a single proceeding. At this point, we are satisfied that reviewing SCE’s MRTU Release 1 costs in its ERRA compliance filing for the 2009 record period is reasonable.\(^2\)

The Commission’s decision makes clear that it does not intend to perform a broad assessment of MRTU, its associated requirements imposed on the IOUs, and the IOUs’ respective implementation efforts. Rather, the Commission held that it is acceptable to review the IOUs’ MRTUMAs in the ERRA Review proceeding. Accordingly, review of the MRTUMA

\(^2\) D.10-07-049, pp. 49-50 (emphasis added); Findings of Fact Nos. 28-29; and Conclusion of Law No. 29.
has been included within the scope of SCE’s, PG&E’s, and SDG&E’s 2010 ERRA Review proceedings, A.10-04-002, A.10-02-012, and A.10-06-001, respectively.¹⁰

B. **Review of the IOUs’ MRTUMAs in Their ERRA Review Proceedings Will Not Produce “Inconsistent” Rulings and Will Not Require the Assigned ALJ to “Learn About MRTU”**

Contrary to DRA’s assertion in its motion, the Commission’s review of the IOUs’ MRTUMAs in their ERRA Review proceedings will not produce “inconsistent” rulings.¹¹ This is because the Commission has prescribed a standard of review for the IOUs’ MRTU implementation costs. Specifically, the Commission has stated that review of the IOUs’ MRTUMAs should “primarily focus on whether the costs can be verified and are incremental.”¹² DRA is also wrong when it argues that the assigned ALJ must “learn about MRTU” when reviewing the IOUs’ implementation costs.¹³ The Commission’s standard only requires the ALJ to confirm that the IOU’s costs recorded in the MRTUMA were (1) verifiable (i.e., incurred in order to implement MRTU) and (2) incremental (i.e., not previously recovered in rate levels). This established standard ensures that SCE and the other IOUs only recover their MRTU-related costs once (i.e., there is no double recovery). Thus, and also contrary to DRA’s arguments, Commission review of SCE’s recorded costs in the ERRA Review proceeding will “ensure accurate cost recovery by [SCE] and [protect] ratepayers from unnecessary costs and rates.”¹⁴

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¹¹ DRA Motion, p. 10.

¹² D.09-12-021, p. 3, fn. 1.

¹³ DRA Motion, p. 1.

¹⁴ Id., p. 10.
C. **It Would Be Grossly Inefficient and a Waste of the Commission’s Time and Resources to Order a Consolidated Review Proceeding**

As noted above, the Commission directed SCE to demonstrate in its ERRA Review proceeding that its costs recorded in the MRTUMA are incremental and verifiable. In accordance with the Commission’s instruction, SCE submitted its costs recorded in the MRTUMA for review in its 2010 ERRA Review proceeding, A.10-04-002. In that proceeding, SCE served the Commission and DRA with substantial testimony and workpapers to support its recorded costs in this account, and also responded to data requests and other inquires. Approximately five months after SCE filed its application, on October 6, 2010, DRA submitted its report in which it stated that it had reviewed SCE’s testimony and workpapers and concluded that “SCE has provided sufficient data to support [its] request” in that proceeding.\(^{15}\) DRA did, however, recommend a disallowance of approximately $77,000 associated with certain costs that DRA argued were not incremental to SCE’s currently-authorized general rate case (GRC) revenue requirement. On November 16, 2010, SCE served its rebuttal testimony addressing DRA’s recommended disallowance and explaining that it correctly calculated the incremental costs being challenged by DRA. The parties have since completed hearings and briefing in this proceeding and are presently awaiting a proposed decision addressing DRA’s recommended disallowance.\(^{16}\)

In light of the foregoing, there is simply no justification for the Commission to grant DRA’s motion and order SCE to resubmit its recorded costs for review in a consolidated proceeding. DRA has admitted that it reviewed these costs and—with one minor exception—found them to be incremental and verifiable. DRA’s own recommendation in A.10-04-002 thus

\(^{15}\) DRA Report in A.10-04-002, p. 5-4.
\(^{16}\) DRA reviewed PG&E’s and SDG&E’s MRTUMAs in their respective 2010 ERRA Review proceedings, A.10-02-012 and A.10-06-001, and did not recommend a disallowance. In PG&E’s 2010 ERRA Review proceeding, A.10-02-012, ALJ Robert Barnett reopened the proceeding for the limited purpose of taking evidence regarding the amount of PG&E’s MRTU revenue requirement. ALJ Barnett’s ruling in that proceeding further supports a finding by the Commission that the IOUs’ MRTUMAs have already been subject to a thorough review in the IOUs’ 2010 ERRA Review proceedings and that DRA’s motion is untimely and should be denied.
demonstrates that there is “little benefit” to re-reviewing SCE’s recorded MRTU costs. Accordingly, the Commission should not throw aside the parties’ efforts at this stage and order them to “start over” in a consolidated review proceeding. Such a ruling would further delay the Commission’s review of these recorded costs (which have been accruing since 2007) and require the parties to essentially duplicate their efforts in A.10-04-002.

D. **The Commission Should Not Order a Consolidated Review Simply Because the IOUs Spent Different Amounts to Implement MRTU**

1. **The Commission Has Already Considered and Rejected DRA’s Argument That the IOUs Should Have Spent the Same Amounts to Implement MRTU Because Their Implementation Efforts Are Driven By “Common Factors”**

DRA’s motion is based on the same argument that it made in A.09-04-002: that the Commission should order a consolidated MRTU proceeding because the IOUs’ MRTU implementation efforts “are driven by the same CAISO directives, FERC Tariffs, and technical requirements” and that as a result, there should be “consistency” in the IOUs’ respective implementation costs.\(^17\) DRA is wrong. As SCE explained in that proceeding, while it is true that the IOUs’ MRTU efforts are driven by common directives, tariff structures, and technical requirements, the manner in which each IOU approaches the requirements can be entirely different:

DRA argues that a comparative review of the IOUs’ costs is appropriate because “the IOUs are driven by common directives, tariff structure[s], and technical requirement[s]”. This is not entirely accurate. Of course, it is true that all market participants are driven by common factors and the CAISO tariff; however, the manner in which each IOU approaches the requirements can be wholly different. For example, CAISO provides a portal to submit MRTU market bids and information, known as “Scheduling Infrastructure Business Rules” (SIBR). Market participants can manually enter their bid and schedule data in SIBR; alternatively, they...
can streamline the process through an application programming interface (API) that can be used to interface with the participants’ internal systems. In this case, SCE implemented the latter solution for a number of reasons, not the least of which is the sheer volume of resources and transactions for which SCE is responsible. In contrast, other participants made their own decisions on internal solutions based on their unique requirements. So, it is incorrect to assume that all participants’ implementation costs should be comparable, simply because the same CAISO rules apply to everyone.

The Commission should also reject this argument because it overstates the “commonality” of the IOUs’ implementation efforts. As SCE explained in its rebuttal testimony, a direct comparison of the IOUs’ MRTU implementation efforts is inappropriate because the three IOUs had different resource portfolios, customer demands, reliability issues, and information systems in place prior to MRTU that had to be modified or replaced. DRA completely ignores these distinctions in its opening brief.18

The Commission agreed with SCE and rejected DRA’s argument in its final decision in A.09-04-002, D.10-07-049. In its decision, the Commission stated that there was “little benefit” in “determine[ing] the reasonableness of each particular utility’s actions when considering each utility’s particular circumstances, such as resource portfolios, customer demands, reliability issues, and information systems in place prior to MRTU.”19

2. **DRA Improperly Tries to Re-litigate Its “Common Factors” Argument in A.09-04-002 by Downplaying the Challenges Posed by MRTU**

The Commission noted in D.10-07-049 that DRA did not dispute SCE’s explanation that the IOUs can address the technical requirements imposed by MRTU in entirely different manners. Now, however, in its motion DRA attempts to challenge SCE’s explanation by arguing that MRTU is “fundamentally a software interface between the IOUs’ operating systems and the CAISO’s operating systems” that is not affected by the IOUs’ size, resource portfolios, customer demands, reliability issue, and information systems.20 DRA’s characterization of MRTU is

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18 See SCE Reply Brief in A.09-04-002, p. 27 (internal citations omitted).
19 D.10-07-049, p. 50.
20 DRA Motion, p. 9.
completely off-base, and indeed contradicted by DRA’s own explanation of the background of MRTU. As the title suggests, MRTU involved a complex “Market Redesign” that required varying adjustments by SCE and the other IOUs—it was not simply a software upgrade. DRA essentially acknowledges this in its motion when it states that MRTU represented a “dramatic increase in complexity” that “required sweeping changes to several of the IOUs energy dispatch processes; managing the overall energy supply portfolio risk, and reconciling transactions related to the trading and procurement of electricity.” The Commission should therefore disregard DRA’s unpersuasive and self-contradicting attempt to downplay the IOUs’ efforts to implement MRTU.

As the Commission recognized in D.10-07-049, MRTU is the result of numerous CAISO stakeholder processes and FERC orders. SCE’s post-MRTU demand characteristics, resource portfolio structure, financial risk tolerance, settlement requirements and projected staffing levels to implement MRTU will necessarily differ from the other IOUs. Again, as SCE explained in A.09-04-002, these differences drive how each IOU approaches the power markets and the requisite degree of systems complexity and automation. While MRTU does in fact impose the same rules and overall technical requirements on all market participants, it is unreasonable to assume that, by extension, the three IOUs’ implementation costs should be similar.

3. **DRA Has Not Identified Any Factual Issues Pertaining to the IOUs’ Implementation Costs in Its Motion**

The Commission stated in D.10-07-049 that it could not “completely” foreclose consolidation only because it had not yet seen “any showings related to any of the IOUs’ MRTU Release 1 capital costs.” However, DRA has not provided the Commission with any factual issues with respect to SCE’s or the other IOUs’ MRTU-related costs in its motion. Rather, DRA has simply provided a chart showing that the IOUs spent different amounts to implement MRTU.

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21 Id., p. 5.
22 D.10-07-049, p. 50.
This unsurprising observation does not justify the Commission ordering a consolidated proceeding. Indeed, the Commission expressly recognized in D.10-07-049 that the IOUs could implement MRTU in completely different ways. And as noted above, DRA already has performed an extensive review of SCE’s MRTU implementation costs in A.10-04-002 and found them to be adequately supported. Based on the foregoing record, there is simply no reason for the Commission to reverse its prior determination that this account should be reviewed annually in the ERRA Review proceeding.

III.

CONCLUSION

For the reasons stated above, the Commission should reject DRA’s motion.

Respectfully submitted,

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June 2, 2011
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’S (U 338-E) OPPOSITION TO THE DIVISION OF RATEPAYER ADVOCATES’ MOTION FOR BIFURCATION AND CONSOLIDATION 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 2nd day of June, at Rosemead, California.

/s/ Melissa A.S. Hernandez
Melissa A.S. Hernandez
Project Analyst
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