BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Joint Application of Southern California Edison Company (U 338-E) and San Diego Gas & Electric Company (U 902-E) to Find the 2014 SONGS Units 2 and 3 Decommissioning Cost Estimate Reasonable and Address Other Related Decommissioning Issues.

Application No. 14-12-007
(Filed December 10, 2014)

RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE MOTION BY CITIZENS OVERSIGHT TO CONSOLIDATE PROCEEDINGS

WALKER A. MATTHEWS III
ESTHER PARK

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California  91770
Telephone:  (626) 302-6879
Facsimile:  (626) 302-6962
E-mail: walker.matthews@sce.com

Dated:  March 26, 2015
Before the Public Utilities Commission of the State of California

Joint Application of Southern California Edison Company (U 338-E) and San Diego Gas & Electric Company (U 902-E) to Find the 2014 SONGS Units 2 and 3 Decommissioning Cost Estimate Reasonable and Address Other Related Decommissioning Issues.

Application No. 14-12-007 (Filed December 10, 2014)

Response of Southern California Edison Company (U 338-E) to the Motion by Citizens Oversight to Consolidate Proceedings

Pursuant to Rule 11.1(e) of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) submits the following response to the Motion by Citizens Oversight to Consolidate Proceedings (Motion).

I.

Introduction

Citizens Oversight’s Motion requests the Commission to consolidate the following pending applications within a single docket:

- Application (A.) 14-12-007 – Joint application by SCE and San Diego Gas & Electric Company (SDG&E) (collectively the Utilities) for approval of: (1) the SONGS 2&3 decommissioning cost estimate (DCE); (2) cessation of contributions to the SONGS 2&3 nuclear decommissioning trust funds (NDTs) at this time; (3) advice letter process for accessing the NDTs; and (4) other related relief;

1
• **A.15-01-014** – SCE application for Commission reasonableness review of 2014 SONGS 2&3 decommissioning expenses; and

• **A.15-02-006** – SDG&E application for Commission reasonableness review of SDG&E’s share of 2014 SONGS 2&3 decommissioning expenses and SDG&E-specific costs.

SCE does not take a position on whether the Commission should grant or deny the Motion. However, SCE disagrees with Citizens Oversight’s underlying assertion that these various applications, which the Commission ordered the Utilities to file separately, will necessarily result in an inefficient and wasteful use of the Commission’s resources unless the Commission consolidates them. As explained below, there are valid reasons supporting the Commission’s initial direction to the Utilities to file separate applications. Therefore, SCE respectfully submits this response to explain these reasons, for the Commission’s consideration in deciding the Motion.

**II. DISCUSSION**

Citizens Oversight is critical of SCE’s and SDG&E’s filing of three separate applications, but fails to recognize that the Commission required SCE and SDG&E to file these applications separately. The Commission first required the Utilities to submit a joint application for the review of the SONGS 2&3 DCE, and then required SCE and SDG&E to submit separate applications for the reasonableness review of the utility’s respective 2014 SONGS 2&3 decommissioning expenses. The Commission’s original sequencing of the applications makes sense, and does not necessarily require consolidation as suggested by Citizens Oversight.

First, the Commission appropriately required the Utilities to first submit the DCE in a joint application (A.14-12-007) for use in subsequent reasonableness reviews in separate applications (A.15-01-014 and A.15-02-006). All parties agree that the DCE establishes the basis for the reasonableness reviews. Although the Commission has not approved the DCE
submitted in A.14-12-007, the Commission can nevertheless conduct a reasonableness review of 2014 SONGS activities and expenses in A.15-01-014 and A.15-02-006, based on this DCE and information provided by utilities in their respective testimony. To the extent the Commission determines that it should first approve the DCE prior to completing the reasonableness reviews, consolidation is not the only available procedural approach. The Commission can sequence the proceedings (without consolidating them) so that the DCE is considered first, followed by the reasonableness reviews in the other proceedings.

Second, although the subject matter in all three applications concerns SONGS decommissioning, the issues raised in the applications are separate and distinct, and involve different types of reviews. In A.14-12-007, the Commission will review the SONGS 2&3 DCE and decommissioning plans, sufficiency of the trusts, and process for accessing the trusts. The proceeding will address a variety of complex technical issues, including, among other things, engineering planning, financial, tax, and other related issues. In A.15-01-014 and A.15-02-006, the Commission’s review will be focused primarily on 2014 SONGS 2&3 decommissioning activities and the associated decommissioning expenses for that year. ORA has also indicated their intent to conduct an audit of 2014 recorded expenses.\(^1\) Therefore, while the subject matter of the applications generally concerns SONGS decommissioning, the particular issues raised in each application and review process are entirely different, warranting separate proceedings if that continues to be the Commission’s procedural preference.

Third, it is not clear that consolidating the matters within a single docket promotes judicial efficiency as suggested by Citizens Oversight. Given the complexities of the disparate issues raised in the applications, the opposite may be true. In particular, consolidating all of these issues in one large proceeding administered by a single Administrative Law Judge could conceivably bog down the Commission’s review and cause delays. What is vital in SCE’s view is that the Commission review and approve the SONGS 2&3 DCE without introducing delays, to

\(^1\) See Protest of ORA submitted in A.15-01-014, p. 1.
establish the basis for SCE’s decommissioning activities and the Commission’s subsequent reasonableness reviews of those activities and associated decommissioning expenses.

III.

CONCLUSION

As explained above, there are valid reasons for the Commission to administer the proceedings separately as originally directed.

Respectfully submitted,

WALKER A. MATTHEWS III
ESTHER PARK

/s/ Walker A. Matthews III
By: Walker A. Matthews III

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California  91770
Telephone:   (626) 302-6879
Facsimile:   (626) 302-6962
E-mail:      walker.matthews@sce.com

March 26, 2015
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Joint Application of Southern California Edison Company and San Diego Gas & Electric Company to Find the 2014 SONGS Units 2 and 3 Decommissioning Cost Estimate Reasonable and Address Other Related Decommissioning Issues.

Application No. 14-12-007
(Filed December 10, 2014)

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 RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE MOTION BY CITIZENS OVERSIGHT TO CONSOLIDATE PROCEEDINGS on all parties identified on the attached service list A.14-12-007. 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.

☒ Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Commissioner(s) or other addressee(s).

ALJ Maribeth A. Bushey
CPUC
505 Van Ness Ave
San Francisco, CA 94102

Executed this March 26, 2015, at Rosemead, California.

/s/ Raquel Ippoliti
Raquel Ippoliti
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

PROCEEDING: A1412007 - EDISON AND SDG&E - T
FILER: SAN DIEGO GAS & ELECTRIC COMPANY
LIST NAME: LIST
LAST CHANGED: MARCH 26, 2015

DOWNLOAD THE COMMA-DELIMITED FILE
ABOUT COMMA-DELIMITED FILES

Back to Service Lists Index

Parties

WALKER A. MATTHEWS, III                     RAYMOND LUTZ
ATTORNEY AT LAW                              NATIONAL COORDINATOR
SOUTHERN CALIFORNIA EDISON COMPANY           CITIZENS OVERSIGHT, INC.
2244 WALNUT GROVE AVENUE, PO BOX 800         771 JAMACHA RD., NO. 140
ROSEMEAD, CA  91770                          EL CAJON, CA  92019
FOR: SOUTHERN CALIFORNIA EDISON COMPANY      FOR: CITIZENS OVERSIGHT

EMMA D. SALUSTRO                             MARIA C. SEVERSON, ESQ.
ATTORNEY                                     AGUIRRE & SEVERSON LLP
SAN DIEGO GAS & ELECTRIC COMPANY             501 WEST BROADWAY, STE. 1050
101 ASH STREET, HQ-12B / PO BOX 1831         SAN DIEGO, CA  92101-3591
SAN DIEGO, CA  92101-3017                    FOR: RUTH HENRICKS
FOR: SAN DIEGO GAS & ELECTRIC COMPANY        FOR: ORA

CLEVELAND LEE                                MATTHEW FREEDMAN
CALIF PUBLIC UTILITIES COMMISSION             THE UTILITY REFORM NETWORK
LEGAL DIVISION                                785 MARKET STREET, 14TH FL
ROOM 5122                                     SAN FRANCISCO, CA  94103
505 VAN NESS AVENUE                           FOR: THE UTILITY REFORM NETWORK
SAN FRANCISCO, CA  94102-3214
FOR: ORA

LINDSEY HOW-DOWNING                          JEAN MERRIGAN
LAW OFFICES OF LINDSEY HOW-DOWNING            PO BOX 2615
3060 EL CERRITO PLAZA, NO. 175                MARTINEZ, CA  94553
EL CERRITO, CA  94530                         FOR: DONNA GILMORE
FOR: PACIFIC GAS AND ELECTRIC COMPANY
# Information Only

<table>
<thead>
<tr>
<th>CASE COORDINATION</th>
<th>RACHEL GOLD</th>
</tr>
</thead>
<tbody>
<tr>
<td>PACIFIC GAS AND ELECTRIC COMPANY</td>
<td>POLICY DIRECTOR</td>
</tr>
<tr>
<td>EMAIL ONLY</td>
<td>LARGE-SCALE SOLAR ASSOCIATION</td>
</tr>
<tr>
<td>EMAIL ONLY, CA  00000</td>
<td>EMAIL ONLY, CA  00000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>UDI HELMAN</th>
<th>MRW &amp; ASSOCIATES, LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>HELMAN ANALYTICS</td>
<td>EMAIL ONLY</td>
</tr>
<tr>
<td>EMAIL ONLY</td>
<td>EMAIL ONLY, CA  00000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>JAMES (JIM) VON RIESEMANN</th>
<th>BRUCE LACY</th>
</tr>
</thead>
<tbody>
<tr>
<td>MIZUHO SECURITIES USA, INC.</td>
<td>LACY CONSULTING GROUP, LLC</td>
</tr>
<tr>
<td>320 PARK AVENUE, 12TH FLOOR</td>
<td>433 WILEY BLVD., NW</td>
</tr>
<tr>
<td>NEW YORK, NY  10022</td>
<td>CEDAR RAPIDS, IA  52405</td>
</tr>
</tbody>
</table>

| VALERIE ONTIVEROZ                     | DANIEL W. DOUGLASS              |
|---------------------------------------| ATTORNEY                        |
| REGULATORY MANAGER/CA                 | DOUGLASS & LIDDELL              |
| SOUTHWEST GAS CORPORATION             | 21700 OXNARD STREET, SUITE 1030 |
| 5241 SPRING MOUNTAIN ROAD             | WOODLAND HILLS, CA  91367       |
| LAS VEGAS, NV  89150-0002              | FOR: ALLIANCE FOR RETAIL ENERGY |
|                                       | MARKETS (AREM)/DIRECT ACCESS    |
|                                       | CUSTOMER COALITION (DACC)/WESTERN POWER TRADING FORUM (WPTF) |

| CASE ADMINISTRATION                   | ESTHER PARK                     |
|---------------------------------------| ATTORNEY                        |
| SOUTHERN CALIFORNIA EDISON COMPANY    | SOUTHERN CALIFORNIA EDISON COMPANY |
| 2244 WALNUT GROVE AVE./PO BOX 800     | 2244 WALNUT GROVE AVE.          |
| ROSEMEAD, CA  91770                   | ROSEMEAD, CA  91770             |

| PAUL D. HUNT                          | RUSSELL HARDING                 |
|---------------------------------------| SOUTHERN CALIFORNIA EDISON COMPANY |
| DIRECTOR, REG. FINANCE/ECO./RISK OP.  | 2244 WALNUT GROVE AVENUE        |
| SOUTHERN CALIFORNIA EDISON COMPANY    | ROSEMEAD, CA  91770             |
| 2244 WALNUT GROVE AVENUE              |                               |
| ROSEMEAD, CA  91770                   |                               |

| RUSSELL WORDEN                        | SANIEL DOMINGUEZ                |
|---------------------------------------| ATTORNEY                        |
| DIRECTOR                               | UTILITY WORKERS UNION OF AMERICA LOC 246 |
| SOUTHERN CALIFORNIA EDISON COMPANY    | 3125 LAS TUNAS DRIVE            |
2244 WALNUT GROVE AVE./PO BOX 800          OCEANSIDE, CA  92057
ROSEMEAD, CA  91770

MICHAEL J. AGUIRRE                        DONALD KELLY
AGUIRRE MORRIS & SEVERSON LLP             EXECUTIVE DIRECTOR
501 W. BROADWAY, STE. 1050                UTILITY CONSUMERS' ACTION NETWORK
SAN DIEGO, CA  92101-3591                 3405 KENYON ST., STE. 401
SAN DIEGO, CA  92110
FOR: UTILITY CONSUMERS' ACTION NETWORK    SAN DIEGO, CA  92110
(UCAN)

WENDY JOHNSON                             CENTRAL FILES
REGULATORY AFFAIRS BRANCH MGR             SAN DIEGO GAS & ELECTRIC COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY         8330 CENTURY PARK CT, CP31-E
8330 CENTURY PARK COURT, CP32D           SAN DIEGO, CA  92123-1530
SAN DIEGO, CA  92123

DONNA GILMORE                             CALIFORNIA ENERGY MARKETS
205 LA SALLE                              425 DIVISADERO ST STE 303
SAN CLEMENTE, CA  92672                   SAN FRANCISCO, CA  94117-2242

J. CONNOR DOYLE                           DORAH SHUEY
PACIFIC GAS AND ELECTRIC COMPANY          582 SWANTON ROAD
77 BEALE STREET, MC B10B, PO BOX 770000   DAVENPORT, CA  95017
SAN FRANCISCO, CA  94177

State Service

KATHERINE MCNABB                        ERIC GREENE
ENERGY COST OF SERVICE & NAT. GAS BR.    CALIF PUBLIC UTILITIES COMMISSION
CALIFORNIA PUBLIC UTILITIES COMMISSION   MARKET STRUCTURE, COSTS AND NATURAL GAS
EMAIL ONLY                               AREA 4-A
EMAIL ONLY, CA  00000                     505 VAN NESS AVENUE
                                          SAN FRANCISCO, CA  94102-3214

GREGORY HEIDEN                           MARIBETH A. BUSHEY
CALIF PUBLIC UTILITIES COMMISSION        CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION                           DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5039                                ROOM 5017
505 VAN NESS AVENUE                      505 VAN NESS AVENUE
SAN FRANCISCO, CA  94102-3214            SAN FRANCISCO, CA  94102-3214

SCOTT LOGAN                              ERIC GREENE
CALIF PUBLIC UTILITIES COMMISSION         CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA  DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 4108                                 ROOM 5017
505 VAN NESS AVENUE                      505 VAN NESS AVENUE
SAN FRANCISCO, CA  94102-3214            SAN FRANCISCO, CA  94102-3214
