

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Investigation into the
November 2018 Submission of Southern
California Edison Risk Assessment and
Mitigation Phase.

I.18-11-006

NOT CONSOLIDATED

Application Of Southern California Edison
Company (U 338-E) For Authority To Increase
Its Authorized Revenues For Electric Service
In 2021, Among Other Things, And To Reflect
That Increase In Rates.

A.19-08-013

**PREHEARING CONFERENCE STATEMENT OF
SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)**

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Dated: **March 20, 2020**

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Pursuant to the March 6, 2020 Administrative Law Judges' (ALJs') Ruling Setting Prehearing Conference and Directing Parties to File and Serve Prehearing Conference Statements, Southern California Edison Company (SCE) respectfully submits its Prehearing Conference Statement. Below, SCE responds to each of the questions posed by the ALJs.

1. *Discussion of the proposal by The Utility Reform Network to incorporate a third attrition year request into Track 1 of Application (A.) 19-08-013, including, but not limited to:*
 - a. *Whether the proposal to not include a Risk Assessment and Mitigation Phase (RAMP) report for year 2024 would negatively impact Southern California Edison Company's (SCE's) 2024 funding request. If so, please explain how;*

SCE cannot definitively state the impact that the absence of a RAMP report for 2024 might have on the funding request for that year, because SCE has not developed its funding request for 2024. SCE believes that the proposal it outlined in the Joint Case Management Statement would foster efficient and accurate consideration of the 2024 funding request, incorporate updated RAMP analyses and anticipated wildfire mitigation plan (WMP) activities for 2024, leverage results from the upcoming Rate Case Plan OIR workshops that will address attrition year mechanisms and issues, and give all parties the opportunity to evaluate more current and updated SCE forecasts for 2024.¹

b. Whether the proposal to not file a 2024 RAMP submission would comply with previous Commission decisions;

SCE believes that the applicable RAMP-related Commission decisions do not specifically prohibit “leaving out” a year in RAMP analysis. SCE notes that this prohibition may not exist because the Commission did not contemplate that a RAMP showing would be filed after the GRC application is submitted. As TURN has pointed out, the RAMP process is designed to be “an initial phase of each utility’s GRC” rather than a latter phase,² and the Commission decisions specify that a utility’s GRC application is intended to follow its RAMP showing by approximately one year.

c. Whether the proposal to not include a 2024 RAMP submission would have any safety implications.

SCE believes that engaging in the RAMP process in an orderly fashion is valuable for safety, particularly in providing transparency regarding the top safety risks that SCE must guard against, and explaining in detail SCE’s existing and planned efforts to mitigate those risks. Whether or not a RAMP showing is submitted for 2024, SCE will continue to focus on maintaining and improving safety for its customers, its employees, and the communities it is

¹ See Joint Case Management Statement, pp. 2-3, 6.

² See D.14-12-025, p. 11.

privileged to serve. The absence of a 2024 RAMP showing will not lessen the priority SCE places on safety for that year or the surrounding years.

2. *The impact on party resources of integrating the RAMP analysis for 2024 into SCE's next RAMP showing (May 2022) versus integrating a third attrition year into Track 1 of A.19-08-013.*

As SCE discussed in the Joint Case Management Statement, SCE's proposal to holistically integrate the RAMP analysis for 2024 into SCE's next RAMP showing will best utilize and conserve resources.³ First, if SCE's proposal is accepted, there will be no burden to any stakeholder of SCE having to modify any aspect of its 2018 RAMP showing years. Second, SED would be able to review and provide its report on SED's normal RAMP timeframe. Third, the RAMP Parties would be able to review and provide their comments on the normal RAMP timeframe.

Fourth, if SCE's 2024 funding request is analyzed in a later GRC track (as SCE suggested in the February 20, 2020 Joint Case Management Statement), then the RAMP analysis would still be timely for purposes of integration into SCE's funding request for 2024. Fifth, the RAMP showing can be informed by a decision on the Track 1 spending request. Sixth, SCE anticipates that by Spring 2023, it will have prepared a WMP covering the years 2023-2024. Deferring consideration of 2024 attrition year revenues until the RAMP and WMP activities are better known for that year will be beneficial to the Commission and interested stakeholders.

On the other hand, if SCE's next RAMP showing is accelerated into Track 1 of this proceeding, it will place a material burden on SCE resources, including certain personnel who are currently performing time-sensitive and critical wildfire mitigation, PSPS, and other emergency management work (*e.g.*, Coronavirus contingency planning). SCE's proposal will not place any material burden on any stakeholder or party in this proceeding.

³ See Joint Case Management Statement, pp. 2-3, 6. SCE notes that the largest burden in deploying resources will fall on SCE because it must prepare the RAMP showing, and SED because it must prepare a detailed regulatory review report concerning SCE's RAMP showing.

Moreover, SCE’s proposal is reasonable, and especially at this critical time in the State’s history, eminently prudent. Litigating now – starting in April 2020 -- the amount and specific types of funding SCE will need in 2024 (as TURN proposes) is unreasonable given the current and growing uncertainty the State and the utilities who provide tens of millions of California customers with crucial services are facing. Choosing TURN’s proposal would have the Commission approve a 2024 attrition year funding mechanism several years in advance with *no* RAMP analysis and *also* no applicable Wildfire Mitigation Plan (WMP),⁴ and with very little degree of certainty of what SCE’s (and the Commission’s and the State’s) needs will actually look like in 2024. SCE respectfully submits that would be unwise.

If, despite all the good reasons to adopt SCE’s procedural proposal, the assigned ALJs were to adopt TURN’s proposal, SCE respectfully insists that SCE be provided the flexibility to devote funds from the adopted 2024 attrition year revenue requirement to programs and activities that will actually be necessary in 2024 to safely, effectively and efficiently serve customers. To that end, if TURN’s proposal is adopted, and a three-year Post Test Year Ratemaking (PTYR) mechanism is put in place several years before 2024, the Commission will by definition not have “authorized” WMP-related wildfire mitigation activities for that year (as there will be no approved or even pending WMP for that year).⁵ In such an event, and as SCE would explain more thoroughly in its testimony, SCE would propose updating through an Advice Letter the attrition year(s)’ forecast spending in particular spending “buckets” closer in time to those attrition year(s). Such a mechanism would be necessary to more timely and accurately reflect actual spending needs for critical programs, including those related to wildfire mitigation and infrastructure replacement, and would also incorporate then-current RAMP and WMP analyses.

⁴ SCE’s currently pending WMP, submitted in February 2020, covers only the period of 2020-2022, not 2023 or 2024.

⁵ See Public Utilities Code Section 8386.3(d) (“An electrical corporation shall not divert revenues authorized to implement the plan to any activities or investments outside of the plan.”)

Respectfully submitted,

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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 **PREHEARING CONFERENCE STATEMENT OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)** on all parties identified on the attached service list(s) **I.18-11-006 and A.19-08-013**. 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.

Executed on **March 20, 2020**, at Rosemead, California.

/s/ Kelly Morikawa Kwong

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