

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

Application of Southern California Edison	)	
Company (U 338-E) For Authorization to	)	Application No. 09-04-__
Recover Costs Necessary to Co-Fund a	)	(Filed on April 3, 2009)
Feasibility Study of a California IGCC with	)	
<u>Carbon Capture and Storage</u>	)	

**APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR  
AUTHORIZATION TO RECOVER COSTS NECESSARY TO CO-FUND A  
FEASIBILITY STUDY OF A CALIFORNIA IGCC WITH CARBON CAPTURE AND  
STORAGE**

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STORAGE**

In compliance with California Public Utilities Commission (Commission) Resolution E-4227A and pursuant to Rule 2.1, et seq. of the Commission’s Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully submits this “*Application for Authorization to Recover Costs Necessary to Co-Fund a Feasibility Study of a California IGCC with Carbon Capture and Storage*” (Application).

**I.**

**INTRODUCTION**

This Application seeks authorization to recover costs necessary for SCE to co-fund a feasibility study that will determine the technical feasibility and commercial reasonableness of an integrated gasification combined cycle (IGCC) facility with carbon capture for use in Enhanced Oil Recovery (EOR) with sequestration in Kern County, California.<sup>1</sup> The facility is referred to

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<sup>1</sup> Carbon capture with long-term storage, sometimes called sequestration, is known as “CCS”.

as Hydrogen Energy California (HECA). If shown to be technically feasible and commercially reasonable, and, if appropriate regulatory and commercial support can be established, the HECA facility will provide low-carbon, baseload electricity within California by gasifying non-conventional fuel resources (primarily petroleum coke from California's oil refineries or, as needed, blends of petroleum coke and other solid fuels) to produce hydrogen for electricity generation through an IGCC plant and capture the CO<sub>2</sub> for EOR with storage. The HECA facility, among several benefits anticipated, will help California reduce greenhouse gas (GHG) emissions, achieve a cleaner environment, increase energy security, demonstrate a technology with broad future applications, create jobs, and help stimulate the California economy.

SCE will participate in the study with Hydrogen Energy International LLC (HEI), and the study will be conducted in two phases. As explained in this Application, SCE is seeking authority to recover \$17 million in costs contributed for Phase I and \$13 million in costs contributed for Phase II. Phase I consists of significant technical, operational, commercial and environmental activities to determine initial feasibility, including a process design package (PDP). This information is represented by approximately 28 engineering, technical and other similar reports. Phase II consists of Front End Engineering Design (FEED) and SCE's incremental costs for developing such regulatory applications as needed to further determine the technical feasibility and commercial reasonableness of the project. As shown in the supporting testimony, the total budget for Phases I and II is \$152 million, demonstrating that SCE's contributions represent well below 50% of the total HECA study budget. Accordingly, SCE's request presents an opportunity to leverage ratepayer funding for a significant amount of non-ratepayer funding to study a promising low-carbon generation technology. In addition, the co-funding requested is a necessary first step to position HECA for co-funding from several existing and anticipated federal sources.

Given the substantial benefits associated with SCE participating in the HECA feasibility study as a minority co-funder, SCE's request in this Application is sound and reasonable and should be granted.

## II.

### SUMMARY OF REQUEST

In Resolution E-4227A, which granted in part and denied in part SCE's Advice Letter (AL) 2274-E request to participate in the HECA feasibility study, the Commission directed SCE to fund up to \$17 million in costs resulting from SCE's participation in Phase I of the HECA feasibility study, and authorized SCE to establish a HECA memorandum account (HECAMA) to record up to \$30 million in costs spent by SCE for Phases I and II of the study. The Commission required that SCE file an application to request recovery of the \$30 million co-funding costs. Accordingly, SCE complies with the Resolution and submits this Application requesting the Commission to:

- Determine that it is reasonable for SCE to comply with Resolution E-4227A and provide up to \$17 million in funding for Phase I of the HECA feasibility study, and establish ratemaking authorizing SCE to recover up to \$17 million for Phase I costs recorded in the HECAMA upon Commission disposition of the Application; and
- Establish ratemaking authorizing SCE to recover up to \$13 million in costs for Phase II of the HECA feasibility study recorded in the HECAMA, subject to a reasonableness review in a future Energy Resource Recovery Account (ERRA) Reasonableness proceeding.<sup>2</sup>
- Approve SCE's Public Disclosure Plan to publicize study results.<sup>3</sup>

SCE further requests that the Commission give the Application priority review, as provided by Resolution E-4227A. Specifically, SCE proposes that the Commission bifurcate the procedural schedule into Phase A and B to allow for expedited review of this Application. Phase A will concern whether the Commission should authorize recovery of Phase I costs, and Phase B

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<sup>2</sup> SCE will record Phase I study costs in the HECAMA as authorized in Resolution E-4227A, but will not provide co-funding for Phase II until the Commission issues a decision on this Application.

<sup>3</sup> Resolution E-4227A.

will concern remaining issues raised in this Application. SCE requests that the Commission issue a decision for Phase A within 90 days of the filing of this Application, and a decision for Phase B before the end of the year. SCE believes that the procedural schedule for both phases can be streamlined given the extensive briefing already submitted by protesters in response to AL 2274-E, and the familiarity with issues that likely intervenors in this proceeding already have. SCE further requests that the Commission give the Application priority review, as provided by Resolution E-4227A. As further explained in this Application and supporting testimony, a timely decision from the Commission is a necessary first step to position HECA for co-funding from existing and anticipated federal sources and advance HECA as a California-based, near-term IGCC demonstration facility with carbon capture and storage.<sup>4</sup>

### III.

#### BACKGROUND

On October 10, 2008, SCE submitted AL 2274-E requesting authorization to record and recover up to \$30 million in costs necessary for SCE to co-fund the HECA feasibility study. In Resolution E-4227A, the Commission expressly acknowledged the substantial benefits warranting SCE's participation in the HECA feasibility study, including finding that:

- The request is consistent with stated Commission and State policies recognizing the necessity to explore all feasible means of meeting long-term GHG reduction goals;
- These aforementioned policies and the substantial scientific evidence in support of those policies suggest that prompt and decisive action on GHG emissions, such as this feasibility study, is justified;
- The feasibility study is supported by Governor Schwarzenegger;
- The feasibility study will facilitate and support HEI's request for private and government funding;

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<sup>4</sup> See Governor Schwarzenegger's letter to President Peevey on May 22, 2008.

- A prompt signal of support from the Commission may be needed for the private capital to support the feasibility study.<sup>5</sup>

In addition, the Commission noted in Resolution E-4227A that Commission support for the HECA feasibility study was consistent with recent recommendations made by the California Energy Commission (CEC) and California Air Resources Board (CARB). Indeed, as noted in Resolution E-4227A, the CEC issued a February 2008 report noting the “value of near-term CCS [carbon capture and sequestration] demonstration projects ‘to provide key data to set CCS policy’” and specifically referenced the benefits of a HECA facility. Similarly, in December 2008, CARB adopted the “*Climate Change Proposed Scoping Plan*”, which observed that more research into carbon sequestration technology is needed, and that “California should [ ] support near-term advancement of the technology.”<sup>6</sup>

For these reasons, the Commission substantially granted much of SCE’s AL 2274-E, and authorized SCE to establish HECAMA to record total study costs up to \$30 million, and directed SCE to co-fund up to \$17 million for Phase I of the HECA feasibility study. The Commission, however, denied SCE’s advice letter request for rate recovery, after ruling that it could not grant SCE rate recovery in an advice letter resolution under the circumstances that SCE presented in AL 2274-E. The Commission further stated that SCE must file an application meeting certain requirements, including: 1) explaining how the proposal fits into SCE’s overall procurement strategy; 2) providing a detailed budget for the HECA feasibility study; 3) proposing a plan to publicize detailed study results to the greatest extent possible; and 4) providing notice to all parties to Decision (D.) 06-05-016 and D.07-12-052 and any other relevant proceeding.<sup>7</sup>

SCE’s Application and supporting testimony in Exhibit SCE-1 fulfill these requirements. Section IV of the Application summarizes the anticipated benefits of the HECA feasibility study. Section V explains how SCE’s participation in the HECA study fits into SCE’s overall

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<sup>5</sup> Resolution E-4227A.

<sup>6</sup> Resolution E-4227A, Background Section.

<sup>7</sup> Resolution E-4227A, Findings ¶¶ 10-12, and Ordering Paragraph ¶ 4.



procurement strategy and benefits SCE's customers. Next, Section VI describes the scope and costs of the HECA study. Thereafter, Section VII provides a Public Disclosure Plan to enable the study results to be publicized to the greatest extent possible following the conclusion of the HECA feasibility study. Finally, the remaining sections of this Application fulfill other statutory requirements.

#### IV.

#### ANTICIPATED BENEFITS OF THE HECA FEASIBILITY STUDY

##### A. California's Environmental and Energy-Security Policies Encourage Proposals Similar to HECA

Global warming and energy security are two important issues that face California and the nation and require prompt action. The Governor and California State Legislature have already taken the lead in establishing a number of policies under Assembly Bill (AB) 32 and AB 1925, Senate Bill (SB) 1368, and Executive Orders S-7-04 and S-3-05 aimed at reducing statewide GHG emissions and increasing California's energy independence. Each of these initiatives sets ambitious GHG-reduction targets, calling for proposals similar to HECA:

- AB 32 was passed to reduce GHG emissions to 1990 levels by 2020.
- AB 1925 required the California Energy Commission (CEC) to provide a report to the California legislature by November 2007 "with recommendations for how the State can develop parameters to accelerate the adoption of cost-effective geologic carbon sequestration strategies."
- SB 1368 establishes an Emission Performance Standard (EPS) for GHG emissions from power plants used to serve baseload power in California, and effectively prohibits California utilities from owning or contracting long term with coal-fired power plants, in- or out-of-state, unless they are operated with CCS.
- Executive Order S-3-05 sets a State target of reducing GHG emissions to 80 percent below 1990 levels by 2050.

- Executive Order S-7-04 encourages the investigation and development of low-carbon electricity and the use of hydrogen as a clean fuel.

But there is a critical need to take affirmative action toward studying and developing a wide array of potential generation solutions that will provide low-carbon electricity within California and still meet the growing energy needs of California’s electricity consumers. To achieve sustained GHG reductions and still meet California’s energy needs, California must consider advancing baseload, low-emitting generation technologies.<sup>8</sup> Clean hydrogen generation from carbon-based fuels, such as petroleum coke from California’s refineries, should be considered as a prime candidate to be such a resource.

The HECA study will evaluate the feasibility of an IGCC facility as a potential low-carbon generation solution. The HECA facility will generate clean energy using petroleum coke (or, as needed, blends of petroleum coke and other solid fuels) to produce hydrogen for electric generation, and will capture approximately 90% of the CO<sub>2</sub> in the fuel source for EOR with sequestration in nearby depleted oil fields within the state, thus producing additional domestic supplies of high quality crude oil. Although IGCC facilities and carbon capture and sequestration processes are individually proven technologies, there is currently no commercial-scale generation facility in operation anywhere in the world that integrates IGCC with carbon capture and sequestration.<sup>9</sup> As a first-of-a-kind feasibility study, the HECA study will help create the technical, cost, regulatory, financial, and commercial framework to lay the foundation for generation resources within California that could utilize petroleum coke, coal, and biomass to generate baseload low-carbon electricity using IGCC with carbon capture and sequestration.<sup>10</sup> Further, it establishes California as the leader in this important technology to accelerate wide-

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<sup>8</sup> SCE’s efforts to study the generation technology described herein are in addition to its ongoing development of renewable power and other efforts to promote GHG-reduction in the electricity sector, including through advanced metering, demand reduction, energy efficiency, electric vehicles, etc.

<sup>9</sup> Exhibit SCE-1, Attachment 1 (“Report on the Benefits of the HECA Study and Proposed Ratemaking”) at 3.

<sup>10</sup> *Id.*

scale and critically needed national and international carbon capture and sequestration deployment.<sup>11</sup>

**B. SCE Anticipates That HECA Will Provide Substantial Environmental and Economic Benefits**

**1. Environmental and Economic Benefits**

SCE believes that the completion of the HECA study itself will provide immediate economic benefits to California. Over the next two years, the HECA feasibility study will employ over 100 California-based professionals, stimulate continued private investment in California, and position California for future job growth as a leader in developing carbon capture and sequestration (CCS) technology in the rapidly growing clean energy sector.<sup>12</sup>

In addition to these immediate benefits, a HECA facility, if technically feasible and commercially reasonable, will result in substantial long-term environmental and economic benefits for California. Indeed, as fully explained in SCE’s supporting testimony to this Application, among the most significant benefits, HECA will provide greater GHG reduction than most baseload generation technologies;<sup>13</sup> reduce California’s reliance on foreign crude imports by increasing in-state crude production through EOR utilizing CO<sub>2</sub>;<sup>14</sup> provide additional tax revenue from income taxes (including EOR), property and sales taxes, and hundreds of new jobs;<sup>15</sup> avoid substantial emissions from petroleum coke that is exported primarily to Asia for uncontrolled combustion, and avoid emissions from crude oil and coke marine transportation.<sup>16</sup> HECA also has the potential to reduce GHG emissions in multiple sectors of California’s

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<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> Exhibit SCE-1, Attachment 1 (“Report on the Benefits of the HECA Study and Proposed Ratemaking”) at pp. 6-7, Figure II-1.

<sup>14</sup> *Id.* at p. 9.

<sup>15</sup> *Id.* at p. 10.

<sup>16</sup> *Id.* at pp. 10-12, Tables II-1 and II-2.

economy, including most notably in the electric generation and transportation sectors.<sup>17</sup> HECA also will provide fuel diversity and a low-carbon alternative to generating electricity using natural gas.<sup>18</sup> And, as a baseload resource near the load centers, HECA complements the state's goal of increasing renewable resources.<sup>19</sup>

## **2. HECA Brings Together the Expertise to Deliver a Timely Opportunity for California**

HECA brings together the expertise and experience in the private and public sectors needed to make a near-term California-based IGCC with CCS a reality. SCE has the experience, expertise, and ability to utilize the regulatory process to enhance the development of new energy and fuel resources with the support of its ratepayers. HEI brings technical, feedstocks, and large complex project integration expertise. HEI and Occidental Petroleum (Oxy) bring leading-edge subsurface and CO<sub>2</sub> EOR expertise. Because initial studies on storage formation integrity have been completed, HECA provides reduced risk, cost savings and several years of schedule advantage over projects with uncharacterized sites. In addition, in filing an Application for Certification (AFC) with the California Energy Commission (CEC), HEI has amassed significant technical, operational, and environmental information and illustrates another schedule advantage for HECA compared to other projects.

## **3. The Funding Requested Positions HECA for Federal Funding**

With Commission support, HECA will be positioned to potentially garner federal funding available for CCS projects.<sup>20</sup> Climate change legislative activity has accelerated starting in late 2008 and has continued under the new Obama administration.<sup>21</sup> The Emergency

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<sup>17</sup> Exhibit SCE-1, Attachment 1 (“Report on the Benefits of the HECA Study and Proposed Ratemaking”) at pp. 10-16.

<sup>18</sup> *Id.* at pp. 10, 16.

<sup>19</sup> *Id.* at pp. 7-8.

<sup>20</sup> *Id.* at pp. 25-26.

<sup>21</sup> Exhibit SCE-1 at p. 21.

Economic Stabilization Act of 2008 contained expanded and new investment tax credits for industrial gasification projects that separate and sequester carbon dioxide, as well as a carbon sequestration tax credit.<sup>22</sup> The American Recovery and Reinvestment Act of 2009 included an additional \$3.4 billion for fossil energy research and development, including an \$800 million increase in funding under the Clean Coal Power Initiative – Round 3 (CCPI-3) from \$440 million to \$1.24 billion.<sup>23</sup> The CCPI-3 solicitation is aimed at promoting commercial demonstration of CO<sub>2</sub> capture and storage technologies from coal and other solid fossil-fuel based power plants to address climate change imperatives. All indications are that the revised CCPI-3 solicitation will provide greater flexibility in feedstock (i.e., allow for coal, petroleum coke and biomass blends) than any previous DOE solicitation for power projects. HECA’s flexible fuel design is well positioned to benefit from this opportunity.<sup>24</sup>

First movers stand to reap considerable financial benefits, and federal funding is weighted such that early movers receive the greatest share of the available support.<sup>25</sup> In January 2009, HEI submitted an application for federal funding under CCPI-3. With Commission approval of this Application, HECA will be even better positioned to receive significant funding through this and other federal programs to increase the project feasibility and reduce the cost of electricity to California consumers. Overall, the opportunity to leverage ratepayer funds for federal funding is particularly advantageous, and further highlights the need for *immediate support and action* by the Commission on this Application.

#### **4. The Benefits Warrant Commission Approval**

In sum, the HECA facility, if shown to be technically feasible and commercially reasonable, will add 250 MW of baseload low-carbon power to the grid, reduce GHG emissions, and help California meet its environmental objectives under AB 32, AB 1925, and SB 1368.

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<sup>22</sup> Exhibit SCE-1 at p. 21.

<sup>23</sup> Exhibit SCE-1 at p. 21.

<sup>24</sup> Exhibit SCE-1 at p. 21.

<sup>25</sup> Exhibit SCE-1 at p. 21.

HECA is also designed to support Executive Orders S-7-04 and S-3-05 concerning developing the use of hydrogen as a clean fuel, and Governor Schwarzenegger's mandate that the Commission and the state's utilities pursue a near-term California-based IGCC with carbon capture and sequestration. The overall economic and environmental benefits that HECA will bring to California include a cleaner environment, more jobs, and additional energy security through both the use of the local petroleum coke as an electricity generation resource and increased California oil production via EOR. What is more, the Application presents an opportunity to leverage a relatively modest amount of ratepayer funding for significant federal and private funding.

SCE's supporting testimony in Exhibit SCE-1 explains the expected benefits HECA will bring to California in further detail.

#### V.

#### **SCE'S PROCUREMENT STRATEGY AND CUSTOMER BENEFITS**

Resolution E-4227A requires SCE to explain in its Application how its proposal to co-fund the HECA feasibility study fits into SCE's overall procurement strategy. While a decision regarding whether SCE will seek to participate in a HECA facility as utility-owned generation (UOG) or through a power purchase agreement (PPA) or fuel supply agreement (FSA) is premature given that the HECA feasibility study is not complete, SCE's participation in the HECA feasibility study advances SCE's efforts to develop a generation and procurement strategy that provides low-carbon baseload generation. In particular, the potential for obtaining power from a HECA facility is attractive for SCE ratepayers because of: 1) its timing to fill SCE's forecasted baseload requirements, 2) its clean generation characteristic, which is consistent with state policy objectives, 3) its in-state location with identified CO<sub>2</sub> off-take for EOR where both the off-taker and HEI have significant experience in such technology, and 4) its fuel characteristic, which helps mitigate regulatory uncertainty as well as provide fuel diversity.<sup>26</sup>

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<sup>26</sup> Exhibit SCE-1 at p. 8.

### **Portfolio Need Assessment**

Based on SCE's internal analysis of forecasted portfolio requirements, SCE has determined that HECA will fulfill to the benefit of SCE's customers a need for at least 125 MW of baseload resources by 2015.<sup>27</sup> Despite conservative assumptions regarding load growth and RPS mandates, SCE may have portfolio need for resources as early as 2012.<sup>28</sup>

### **Greenhouse Gas Policy**

As stated above, California has established itself as a leader in renewable energy policy and has committed to reducing its GHG emissions through a number of policy initiatives under AB 32, AB 1925, SB 1368, and Executive Orders S-7-04 and S-3-05.<sup>29</sup> Approval of cost recovery for the HECA study will allow SCE to comply with these state policies establishing lower GHG emissions, cleaner generation and the development of carbon capture and sequestration, all of which will benefit SCE's customers.<sup>30</sup>

### **Fuel Diversity**

California is limited in how much CO<sub>2</sub> reduction it can achieve due to its limited fuel diversity.<sup>31</sup> Nuclear and coal generation facilities are unlikely to develop within California in the future, unless integrated gasification combined cycle (IGCC) with CCS technology becomes commercial and legislation prohibiting the construction of new nuclear power plants in California is repealed or the statutory requirements of that legislation are met. Currently, natural gas generation makes up half of SCE's portfolio.<sup>32</sup> HECA could be a potential alternative to natural gas generation, and can increase fuel diversity in the state.<sup>33</sup> Furthermore, generation from a HECA facility would be cleaner than existing coal and natural gas power supplied to the state today, and could assist in reducing GHG emissions and meeting GHG-reduction targets set

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<sup>27</sup> Exhibit SCE-1 at p. 4.

<sup>28</sup> Exhibit SCE-1 at p. 4.

<sup>29</sup> Exhibit SCE-1 at p. 7.

<sup>30</sup> Exhibit SCE-1 at p. 7.

<sup>31</sup> Exhibit SCE-1 at p. 8.

<sup>32</sup> Exhibit SCE-1 at p. 8.

<sup>33</sup> Exhibit SCE-1 at p. 8.

by state policies.<sup>34</sup> Obtaining fuel diversity for generation resources provides a straightforward benefit to SCE's customers.<sup>35</sup>

SCE's supporting testimony in Exhibit SCE-1 explains SCE's procurement strategy and expected customer benefits in further detail.

## VI.

### SCOPE AND COSTS OF HECA FEASIBILITY STUDY

The HECA study is divided into two phases. While the phases are generally organized in chronological order by time of implementation, certain aspects of the phases may be implemented on a parallel basis.

#### A. Description of Study

Phase I: Phase I shall consist of the significant technical, operational, commercial and environmental activities required to determine initial feasibility. This is represented by approximately 28 reports and documents developed for HECA on the following subjects:<sup>36</sup>

- Technology appraisal.
- Feedstock and water.
- Process and system configuration.
- EOR and carbon sequestration.
- Environmental safety and health (ES&H).
- Operations, maintainability, and constructability.
- Water treatment.
- Acid gas removal (AGR).
- CAISO interconnection.
- Value engineering.

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<sup>34</sup> Exhibit SCE-1 at p. 8.

<sup>35</sup> Exhibit SCE-1 at p. 8.

<sup>36</sup> Exhibit SCE-1, Attachment 2 ("Report on the Benefits SCE will Obtain in Support of Advice Letter") at pp. 10-12.



- Process design package (PDP).

Phase II: Phase II shall consist of the FEED activities required to further determine technical feasibility and commercial reasonableness. This is represented by FEED reports and documents developed for HECA.<sup>37</sup>

**B. Budget of the HECA Feasibility Study**

The gross cost of the HECA feasibility study is approximately \$152 million.<sup>38</sup> The \$30 million in funding requested by SCE (consisting of the \$17 million directed in Resolution E-4227A for Phase I and an additional \$13 million for Phase II) is an important but minority contribution of the funding necessary to complete the identified stages of the feasibility assessment.<sup>39</sup>

<b>HECA Feasibility Study Budget (\$million)</b>		
	<b>Phase I</b>	<b>Phase II</b>
Administrative & General (A&G)		
Technical Labor and Support Services	25.7	11.5
Business Service Agreements (BSAs)	4.2	3.3
Equipment & Plant	0.0	0.0
Third Party Vendors	40.9	39.1
Permitting Feasibility	8.3	18.7
Phase Total	79.1	72.6
HECA Feasibility Study Total		151.7

SCE’s supporting testimony in Exhibit SCE-1 explains the budget for the HECA feasibility study in further detail.

**C. Payment Schedule**

SCE will provide co-funding for the HECA feasibility study as follows:<sup>40</sup>

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<sup>37</sup> Exhibit SCE-1, Attachment 2 (“Report on the Benefits SCE will Obtain in Support of Advice Letter”) at pp. 10-12.

<sup>38</sup> Exhibit SCE-1 at p. 9.

<sup>39</sup> Exhibit SCE-1 at p. 10.

<sup>40</sup> Exhibit SCE-1, Attachment 4 (“HECA Study Agreement”).

<b>Milestones</b>	<b>Payment Amount from SCE to HEI</b>	<b>Deliverable from HEI to SCE</b>
<b>Phase I</b>		
Within thirty (30) days of execution of HECA Study Agreement	\$10 million	
Within thirty (30) days of \$10 million payment		25 reports (shown as Delivery 1 in Exhibit SCE-1, Attachment 4 (“HECA Study Agreement”))
Within thirty (30) days of HEI Notice of Execution of the GE Agreement	\$3.5 million	
Within thirty (30) days of HEI’s Notice of Completion of the Process Design Package	\$3.5 million	
Within thirty (30) days of last Phase I \$3.5 million payment		3 reports (shown as Delivery 2 in Exhibit SCE-1, Attachment 4 (“HECA Study Agreement”))
<b>Total Phase I</b>	<b>\$17 million</b>	
<b>Phase II</b>		
Within thirty (30) days of HEI notifying SCE of total Phase II spending of \$20 million	\$10 million	
Within thirty (30) days of delivery of FEED reports and documents to SCE*	\$3 million	FEED report (shown in Delivery 3 in Exhibit SCE-1, Attachment 4 (“HECA Study Agreement”))
<b>Total Phase II*</b>	<b>\$13 million</b>	
<b>Total Phases I and II*</b>	<b>\$30 million</b>	
<b>* SCE’s second Phase II payment will be approximately \$3 million, less SCE’s incremental costs associated with the process of applying for, and obtaining, a CPUC decision on a CPCN, FSA or PPA relating to HECA.</b>		

The scope and costs for the HECA feasibility study are further explained in SCE’s supporting testimony, Exhibit SCE-1.

## VII.

### PUBLIC DISCLOSURE PLAN

#### Public Disclosure Plan Terms

Resolution E-4227A requires SCE to propose a disclosure plan that publicizes the detailed results of the HECA feasibility study to the greatest extent possible. Consistent with this requirement and Commission practice, SCE proposes the following Public Disclosure Plan ("Plan").

Key to the plan are two principles: (1) that all the reports provided in Phase I should be made public to greatest extent possible, and (2) that SCE and HEI should outreach to interested parties in that regard. The Plan has two basic components: (1) public workshops and (2) a process to provide access to one or more Reports with appropriate copyright/use restrictions as provided by law.

(1) **WORKSHOPS:** Within thirty days of the Commission's decision on the Public Disclosure Plan, SCE and HEI will schedule two, half-day public workshops; one each in the San Francisco and Los Angeles areas. The purpose of the workshops is to provide the results of, review, and answer questions as to the Reports provided in Phase I. Copies of such Reports will be available for inspection at that time.

(2) **COPIES OF REPORTS:** A third party ("Requesting Party") seeking a copy of one or more of the Reports listed on Exhibit A will be required to file in this docket a written request. The Requesting Party will be charged a fee based on the reproduction costs of the material requested and postage. A fee schedule for production of each Report will be available at the workshops.

SCE and HEI will each have the right to request that the Commission issue a protective order, based on the model protective order and non-disclosure certificate attached as Appendix A to D.08-04-023, to protect material deemed protected by General Order 66 as intellectual

property, trade secret, market sensitive or other confidential and/or proprietary information that may be included within Reports or subsequently requested in this or any related proceeding.

#### **Potential Site Locations and Water Resources**

During the HECA feasibility study, HEI may need to acquire legal rights to hold, have access to, or acquire potential sites, water resources and enter into similar commercial relationships while studying those properties and resources for suitability for a potential HECA facility. SCE and HEI propose to keep confidential information relating to specific locations, property appraisals, and discussions with property owners in order to avoid setting a price floor. For similar reasons, SCE and HEI propose to keep confidential information relating to the evaluation of water and similar resources such as feedstock providers and discussions with individuals or entities possessing rights to those resources.

#### **Pre-Procurement Cost Estimates**

During the HECA feasibility study, SCE may conduct and HEI already has conducted significant portions of the study through vendors. SCE proposes to keep confidential the detail of cost estimates provided by these vendors in order to avoid setting a price floor. Moreover, because HEI already engaged vendors prior to SCE's initiation of this proceeding, much of the data and information provided in connection with the vendor-supplied analysis is subject to pre-existing confidentiality and non-disclosure provisions that would prohibit dissemination of such information absent an appropriate protective order, and in many cases, separate confidentiality arrangements.

### **VIII.**

#### **LEGAL AUTHORITY**

The Commission possesses broad constitutional and statutory authority to grant the relief requested by SCE in this Application. Public Utilities Code Sections 454 and 701 give the Commission authority to approve rate increases. Public Utilities Code Section 380 and 454.5 provide guidance regarding the Commission's review of the investor-owned utilities' (IOU)

procurement plan process, and require the Commission, among other things, to establish policies for energy procurement and to ensure that IOUs implement a long-term resource planning process. The relief sought in this Application is consistent with the Commission's role in establishing energy policies and reviewing the IOU's long-term resource plans.

## IX.

### RATEMAKING

SCE sets forth its ratemaking proposal for recovery of HECA feasibility study costs consistent with Ordering Paragraph 4 of Resolution E-4227A.

SCE filed AL 2274-E requesting Commission authority to establish a HECA memorandum account (HECAMA), and authority to recover up to \$30 million in costs necessary to co-fund the HECA feasibility study, as follows:

- Costs of technical, operational, commercial and environmental activities associated with Phase I of the HECA feasibility study, represented by reports and documents on the following subjects:
  1. Technology appraisal.
  2. Feedstock and water.
  3. Process and system configuration.
  4. EOR and carbon sequestration.
  5. Environmental safety and health (ES&H).
  6. Operations, maintainability, and constructability.
  7. Water treatment.
  8. Acid gas removal.
  9. CAISO interconnection.
  10. Value engineering.
  11. Process design package.

- Costs associated with HECA Phase II feasibility studies, consisting of the FEED activities and represented by FEED reports and documents developed for HECA.<sup>41</sup>
- SCE's incremental Operations and Maintenance (O&M) expenses<sup>42</sup>.

On February 20, 2009, the Commission issued Resolution E-4227A, which among other things:

- Authorized SCE to establish the HECAMA to record up to \$30 million in costs resulting from SCE's participation in the HECA study.
- Directed SCE to fund up to \$17 million for Phase I of the HECA study, and to record those costs in the HECAMA.
- Approved the revised tariff sheets as submitted by SCE in Attachment A to Advice 2274-E.
- Ordered SCE to file an application to obtain Commission authority to recover Phase I and Phase II feasibility study costs recorded, or to be recorded in the HECAMA.

Consistent with Ordering Paragraph 4 of the Resolution E-4227A, SCE requests authority to recover its reasonably-incurred Phase I and Phase II HECA feasibility study costs. Testimony in Exhibit SCE-1 shows that the \$17 million forecasted for HECA Phase I feasibility study costs is reasonable and eligible for recovery from customers. Thus, SCE requests Commission authority to recover HECA Phase I feasibility study costs (up to a maximum of \$17 million) from customers by transferring HECA Phase I feasibility study costs from the HECAMA to the generation sub-account of the Base Revenue Requirement Balancing Account (BRRBA). Transfer of SCE's recorded HECA Phase I feasibility study costs from the HECAMA to the

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<sup>41</sup> FEED reports are fully discussed in SCE witness Mark Nelson's sponsored testimony in Exhibit SCE-1.

<sup>42</sup> SCE does not anticipate recording any incremental O&M costs in the HECAMA other than HECA feasibility study costs.

BRRBA<sup>43</sup> would occur subsequent to the issuance of a final Commission decision in this instant application, at the earliest.

As allowed by Resolution E-4227A, SCE may record up to \$13 million of HECA Phase II feasibility study costs in the HECAMA. Should any HECA Phase II feasibility study costs be recorded in the HECAMA, SCE requests Commission authority to recover all of its reasonably-incurred HECA Phase II feasibility study costs from customers in a manner similar to the Phase I feasibility study costs discussed above. In a future ERRA Reasonableness of Operations application before the Commission, SCE will provide testimony supporting the reasonableness of recorded HECA Phase II feasibility study costs. Should the Commission find any HECA Phase II feasibility study costs ineligible for recovery, SCE will remove such costs from the HECAMA.

## X.

### OTHER PARTICIPANTS

A crucial component of the agreement of SCE to partially fund the HECA Study, supported by the Commission's findings in Resolution E-4227A, is that the study is of the type consistent with “a variety of state policies” (Finding of Fact 2); particularly that HECA can be a low-carbon, baseload generation resource “that will advance California's move towards reduced greenhouse gas emissions while producing reliable power within the state and with locally derived sources” (Resolution at 2).

While the HECA study and related studies of constituent study parts are funded primarily from private sources, the SCE funding contribution to the feasibility study is an integral part of the overall plan to attract and secure additional private and public support for the study of developing new clean fuel technologies. As stated at the Commission meeting in which this Resolution was approved, the SCE partial funding is expected to provide support to obtain the requested Federal funding.

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<sup>43</sup> SCE consolidates all pending Commission-authorized revenue requirements into one advice letter filed in compliance with a final decision in its ERRA Forecast of Operations proceeding, filed annually in August. The BRRBA balance is included in such advice filings.

Recognizing the statewide potential benefits, the Commission encouraged the state's investor-owned utilities and publicly-owned utilities in Resolution E-4227A to become partners in the HECA feasibility study, and for all utilities to work together on commercializing carbon capture and storage technology. The Commission further noted that "if the California utilities work together, the costs and risks of this and other CCS projects can be shared broadly so that the benefits can be realized by all California."<sup>44</sup> SCE and HEI fully endorse the Commission's statements in this regard and welcome additional contributions to the HECA feasibility study. Such funding will be subject to negotiations between the affected parties, but to the extent SCE receives any portion of additional funding, the amount will be treated as an offset to the costs recorded in the HECAMA.

SCE also recognizes that the Commission's rules, as discussed in the Resolution, may present complications or delays to such participation. To accomplish the Commission's stated goals of broad participation by other utilities, the Commission could develop expedited procedures to be used by other potential participants in the HECA feasibility study to ensure doing so on a timely basis.

## **XI.**

### **SUMMARY OF REQUEST**

SCE respectfully requests the Commission to issue an order to:

- 1) Determine that it is reasonable for SCE to comply with the Resolution E-4227A and provide funding of up to \$17 million in costs for Phase I of the HECA feasibility study, and establish ratemaking authorizing SCE to recover up to \$17 million for Phase I costs recorded in the HECAMA, upon Commission disposition of the Application;
- 2) Establishing ratemaking authorizing SCE to recover up to \$13 million in costs for Phase II of the HECA feasibility study recorded in the

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<sup>44</sup> Resolution E-4227A, Summary.



- HECAMA, subject to a reasonableness review in a future Energy Resource Recovery Account (ERRA) Reasonableness proceeding; and
- 3) Approve SCE's Public Disclosure Plan to publicize study results.

## **XII.**

### **ACCOMPANYING EXHIBITS**

This Application is supported by the prepared direct testimony contained in Exhibit SCE-1, entitled *Testimony of Southern California Edison Company in Support of Application for Authorization to Recover Costs Necessary to Co-Fund a Feasibility Study of a California IGCC with Carbon Capture and Storage*, and the following attachments to the testimony:

1. Attachment 1 – SCE-1 (“Report on the Benefits of the HECA Study and Proposed Ratemaking”) submitted in support of Advice Letter 2274-E;
2. Attachment 2 – SCE-2 (“Report on the Benefits SCE Will Obtain”) submitted in support of Advice Letter 2274-E;
3. Attachment 3 – SCE-3 (“Independent Assessment of the Benefits SCE Will Obtain”) submitted in support of Advice Letter 2274-E;
4. Attachment 4 – HECA Study Agreement;
5. Attachment 5 – Governor Schwarzenegger’s May 22, 2008 letter to President Peevey; and
6. Attachment 6 – WESTCARB Letter of Support.

## **XIII.**

### **STATUTORY AND PROCEDURAL REQUIREMENTS**

#### **A. Statutory and Procedural Authority**

This Application is made pursuant to the California Public Utilities Code and the Commission’s Rules. Specifically, SCE’s authority for this request is Sections 399.2, 451, 454, 491, 701, 728, and 729 of the Public Utilities Code of the State of California, and Article 2 and

Rule 3.2 of the Commission’s Rules of Practice and Procedure. SCE’s request complies with Article 1, which specifies the procedures for the filing of documents, specifically:

1. Form and size of tendered documents (Rule 1.5);
2. Title page (Rule 1.6);
3. Scope of Filing (Rule 1.7);
4. Signatures (Rule 1.8);
5. Service (Rule 1.9 to 1.10);
6. Verification (Rule 1.11); and
7. Tendering and Review of Document for Filing (Rule 1.13).

In addition, this request complies with Article 2 of the Commission’s Rules, and prior decisions, orders and resolutions of this Commission.

**B. Rule 2.1**

Rule 2.1 requires that applications state “the proposed category for the proceeding, the need for hearing, the issues to be considered, and a proposed schedule.” SCE proposes this Application be designated as a “ratesetting” proceeding. SCE believes that hearings are not necessary for this Application. The proposed schedule below provides a placeholder for hearing dates in the event the Commission determines that hearings are necessary.

SCE further requests that the Commission give the Application priority review, as provided by Resolution E-4227A. Specifically, SCE proposes that the Commission bifurcate the procedural schedule into Phase A and B to allow for expedited review of this Application. Phase A will concern whether the Commission should authorize recovery of Phase I costs, and Phase B will concern remaining issues raised in this Application. SCE requests that the Commission issue a decision for Phase A within 90 days of the filing of this Application, and a decision for Phase B before the end of the year. SCE believes that the procedural schedule for both phases can be streamlined given the extensive briefing already submitted by protesters in response to AL 2274-E, and the familiarity with the issues that likely intervenors in this proceeding certainly

already have. SCE has filed a Motion for Expedited Procedural Schedule requesting the following procedural schedule:

<i>Proposed Application Schedule</i>	
<b>Date</b>	<b>Event</b>
April 3, 2009	Application Filed; Discovery Period Commences
April 20, 2009	Protests Due
April 24, 2009	Prehearing Conference
April 30, 2009	Scoping Memo Issued for Phases A and B
May 11, 2009	Intervenor Testimony for Phase A due
May 18, 2009	Rebuttal Testimony for Phase A due
May 21, 2009	Evidentiary Hearings for Phase A
May 28, 2009	Oral Argument for Phase A in lieu of Post-Hearing Briefs
June 15, 2009	Proposed Decision for Phase A issued
June 29, 2009	Final Decision for Phase A issued
August 3, 2009	Intervenor Testimony for Phase B due
August 10, 2009	Rebuttal Testimony for Phase B due
September 1, 2009	Evidentiary Hearings for Phase B
September 9, 2009	Oral Argument for Phase B in lieu of Post-Hearings Briefs
September 23, 2009	Proposed Decision for Phase B issued
October 16, 2009	Final Decision for Phase B issued

The issues to be considered by the Commission in this proceeding are described above and set forth in detail in SCE’s testimony in support of this Application. Major issues include:

- (1) Is it reasonable for SCE to comply with Resolution E-4227A and provide up to \$17 million in funding for Phase I of the HECA feasibility study, and for the Commission to establish ratemaking authorizing SCE to recover up to \$17 million for Phase I costs recorded in the HECAMA upon Commission disposition of the Application?

(2) Should SCE be authorized to recover up to \$13 million in costs for Phase II of the HECA feasibility study recorded in the HECAMA, subject to a reasonableness review in a future Energy Resource Recovery Account (ERRA) Reasonableness proceeding?

(3) Should the Commission approve SCE's Public Disclosure Plan?

**C. Legal Name and Correspondence**

SCE is an electric public utility organized and existing under the laws of the State of California. The location of SCE's principal place of business is 2244 Walnut Grove Avenue, Rosemead, California 91770. Correspondence or communications regarding this Application should be addressed to:

Douglas K. Porter  
Southern California Edison Company  
2244 Walnut Grove Avenue  
Rosemead, CA 91770  
Telephone: (626) 302-3964  
Facsimile: (626) 302-3990  
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Walker A. Matthews, III  
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Angelica M. Morales  
Southern California Edison Company  
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E-mail: [angelica.morales@sce.com](mailto:angelica.morales@sce.com)

Case Administration  
Southern California Edison Company  
P. O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, CA 91770  
Telephone: (626) 302-3003  
Facsimile: (626) 302-3119  
E-mail: [caseadmin@sce.com](mailto:caseadmin@sce.com)

**D. Articles of Incorporation – Rule 2.2**

A copy of SCE’s Restated Articles of Incorporation, effective March 2, 2006 and presently in effect, and certified by the California Secretary of State, was filed with the Commission on March 14, 2006, in connection with Application No. 06-03-020<sup>45</sup> and is incorporated herein by reference pursuant to Commission Rule 2.2.

Certain classes and series of SCE’s capital stock are listed on a “national securities exchange” as defined in the Securities Exchange Act of 1934 and copies of SCE’s latest Annual Report to Shareholders and its latest proxy statement sent to its stockholders has been filed with the Commission with a letter of transmittal dated April 5, 2006, pursuant to General Order Nos. 65-A and 104-A of the Commission.

**E. Authority to Increase Rates – Rule 3.2**

Rule 3.2 requires that applications for authority to increase rates, or to implement changes that would result in increased rates, contain the following data.

**1. Balance Sheet and Income Statement – Rule 3.2(a)(1)**

Appendix A to this application contains copies of SCE’s balance sheet as of December 31, 2008, and income statement for the period ended December 31, 2008, the most recent period available.

**2. Present and Proposed Rates – Rule 3.2(a)(2) and (a)(3)**

The cost-recovery mechanism proposal and the projected impact on rates are summarized above and discussed in Exhibit SCE-1. The attached Appendix D is a copy of SCE’s Notification of Application Filing Regarding Proposed Increase in Electric Rates (Bill Insert). SCE received approval of the Bill Insert from the Commission’s Public Advisor’s Office on April 2, 2009.

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<sup>45</sup> A.06-03-020, filed March 14, 2006, for approval of early transfer of Anaheim’s share of SONGS 2 & 3 to SCE.

**3. Description of SCE’s Service Territory and Utility System – Rule 3.2(a)(4)**

Because this submittal is not a general rate application, this requirement is not applicable.

**4. Summary of Earnings – Rule 3.2(a)(5)**

Rule 3.2(a)(5) requires:

A summary of earnings (rate of return summary) on a depreciated rate base for the test period or periods upon which applicant bases its justification for an increase.

SCE’s 2008 Summary of Earnings is attached hereto as Appendix B.

**5. Depreciation – Rule 3.2(a)(7)**

Because this submittal is not a general rate application, this requirement is not applicable.

**6. Capital Stock and Proxy Statement – Rule 3.2(a)(8)**

Because this submittal is not a general rate application, this requirement is not applicable.

**7. Statement Pursuant to Rule 3.2(a)(10)**

Rule 3.5(a)(10) requires the applicant to state whether its request is limited to passing through to customers “only increased costs to the corporation for the services or commodities furnished by it.” This request is not a pass through of costs.

**8. Service of Notice – Rule 3.2(b), (c), and (d)**

A list of the cities and counties affected by the rate changes resulting from this application is attached as Appendix C. The State of California is also an SCE customer whose rates would be affected by the proposed revisions.

As provided in Rule 3.2(b) – (d), notice of filing of this application will be:  
(1) mailed to the appropriate officials of the state and the counties and cities listed in Appendix C; (2) published in a newspaper of general circulation in each county in SCE’s service territory within which the rate changes would be effective; and (3) mailed to all customers affected by the proposed changes.

**F. Service List**

In compliance with Resolution E-4227A, SCE is serving this Application and its exhibits on all parties on the Commission’s service list for proceedings Decision (D.) 06-05-016, D.07-12-052 and D.08-04-038.

**XIV.**

**REQUESTED RELIEF**

SCE respectfully requests that the Commission issue an order:

(1) Determining that it is reasonable for SCE to comply with the Resolution E-4227A and provide funding of up to \$17 million in costs for Phase I of the HECA feasibility study, and establish ratemaking authorizing SCE to recover up to \$17 million for Phase I costs recorded in the HECAMA, upon Commission disposition of the Application;

(2) Establishing ratemaking authorizing SCE to recover up to \$13 million in costs for Phase II of the HECA feasibility study recorded in the HECAMA, subject to a reasonableness review in a future Energy Resource Recovery Account (ERRA) Reasonableness proceeding;

(3) Approving SCE’s Public Disclosure Plan; and

(4) Granting such additional relief as the Commission may deem proper.

Respectfully submitted,

DOUGLAS K. PORTER  
WALKER A. MATTHEWS, III  
ANGELICA M. MORALES

/s/Walker A. Matthews III

By: Walker A. Matthews III

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

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April 3, 2009



## VERIFICATION

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this **3rd day of April, 2009**, at Rosemead, California.

/s/John R. Fielder  
John R. Fielder  
President  
SOUTHERN CALIFORNIA EDISON COMPANY

**Appendix A**

**SCE's Balance Sheet And Income Statement**

SOUTHERN CALIFORNIA EDISON COMPANY  
STATEMENT OF INCOME  
TWELVE MONTHS ENDED DECEMBER 31, 2008  
(Millions of Dollars)

OPERATING REVENUE	<u>\$11,248</u>
OPERATING EXPENSES:	
Fuel	1,400
Purchased power	3,845
Other operation and maintenance expenses	3,013
Depreciation, decommissioning and amortization	1,114
Property and other taxes	232
Gain on sale of assets	(9)
Total operating expenses	<u>9,595</u>
OPERATING INCOME	1,653
Interest income	22
Other nonoperating income	101
Interest expense - net of amounts capitalized	(407)
Other nonoperating deductions	(123)
INCOME BEFORE INCOME TAX AND MINORITY INTEREST	<u>1,246</u>
INCOME TAX EXPENSE	342
MINORITY INTEREST	170
NET INCOME	<u>734</u>
DIVIDENDS ON PREFERRED AND PREFERENCE STOCK - NOT SUBJECT TO MANDATORY REDEMPTION	<u>51</u>
NET INCOME AVAILABLE FOR COMMON STOCK	<u>\$683</u>

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET

DECEMBER 31, 2008

CAPITALIZATION AND LIABILITIES

(Millions of Dollars)

CAPITALIZATION:

Common stock	\$2,168
Additional paid-in capital	532
Accumulated other comprehensive loss	(14)
Retained Earnings	<u>3,827</u>
Common shareholder's equity	<u>6,513</u>

Preferred and preference stock not subject to redemption requirements	920
Long-term debt	<u>6,212</u>
	<u>13,645</u>

CURRENT LIABILITIES:

Short-term debt	1,893
Long-term debt due within one year	150
Accounts payable	948
Accrued taxes	340
Accrued interest	153
Counterparty collateral	8
Customer deposits	227
Book overdrafts	224
Derivative liabilities	156
Regulatory liabilities	1,111
Other current liabilities	<u>564</u>
	<u>5,774</u>

DEFERRED CREDITS:

Accumulated deferred income taxes - net	2,918
Accumulated deferred investment tax credits	101
Customer advances	137
Derivative liabilities	738
Accumulated provision for pensions and benefits	2,485
Asset retirement obligations	3,007
Regulatory liabilities	2,481
Other deferred credits and other long-term liabilities	<u>902</u>
	<u>12,769</u>

Minority interest	<u>380</u>
	<u>\$32,568</u>

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET

DECEMBER 31, 2008

A S S E T S

(Millions of Dollars)

UTILITY PLANT:

Utility plant, at original cost	\$21,825
Less - Accumulated depreciation and decommissioning	<u>(5,570)</u>
	16,255
Construction work in progress	2,454
Nuclear fuel, at amortized cost	<u>260</u>
	<u>18,969</u>

OTHER PROPERTY AND INVESTMENTS:

Nonutility property - less accumulated provision for depreciation of \$765	953
Nuclear decommissioning trusts	2,524
Other Investments	<u>68</u>
	<u>3,545</u>

CURRENT ASSETS:

Cash and equivalents	1,611
Short-term investments	3
Margin and collateral deposits	17
Receivables, including unbilled revenues, less reserves of \$39 for uncollectible accounts	703
Accrued unbilled revenue	328
Inventory	365
Accumulated deferred income taxes - net	147
Derivative assets	157
Regulatory assets	605
Other current assets	<u>266</u>
	<u>4,202</u>

DEFERRED CHARGES:

Regulatory assets	5,414
Derivative assets	74
Other long-term assets	<u>364</u>
	<u>5,852</u>
	<u>\$32,568</u>

APPENDIX A

A-1

**Appendix B**

**Cities And Counties Served By SCE**

Citizens or some of the citizens of the following counties and municipal corporations will or may be affected by the changes in rates proposed herein.

**COUNTIES**

Fresno	Kings	Orange	Tuolumne*
Imperial	Los Angeles	Riverside	Tulare
Inyo	Madera	San Bernardino	Ventura
Kern	Mono	Santa Barbara	

**MUNICIPAL CORPORATIONS**

Adelanto	Cudahy	La Habra	Ojai	Santa Monica
Agoura Hills	Culver City	La Habra Heights	Ontario	Santa Paula
Alhambra	Cypress	La Mirada	Orange	Seal Beach
Aliso Viejo	Delano	La Palma	Oxnard	Sierra Madre
Apple Valley	Desert Hot Springs	La Puente	Palm Desert	Signal Hill
Arcadia	Diamond Bar	La Verne	Palm Springs	Simi Valley
Artesia	Downey	Laguna Beach	Palmdale	South El Monte
Avalon	Duarte	Laguna Hills	Palos Verdes Estates	South Gate
Baldwin Park	El Monte	Laguna Niguel	Paramount	South Pasadena
Barstow	El Segundo	Laguna Woods	Perris	Stanton
Beaumont	Exeter	Lake Elsinore	Pico Rivera	Tehachapi
Bell	Farmersville	Lake Forest	Placentia	Temecula
Bell Gardens	Fillmore	Lakewood	Pomona	Temple City
Bellflower	Fontana	Lancaster	Port Hueneme	Thousand Oaks
Beverly Hills	Fountain Valley	Lawndale	Porterville	Torrance
Bishop	Fullerton	Lindsay	Rancho Cucamonga	Tulare
Blythe	Garden Grove	Loma Linda	Rancho Mirage	Tustin
Bradbury	Gardena	Lomita	Rancho Palos Verdes	Twentynine Palms
Brea	Glendora	Long Beach	Rancho Santa Margarita	Upland
Buena Park	Goleta	Los Alamitos	Redlands	Victorville
Calabasas	Grand Terrace	Lynwood	Redondo Beach	Villa Park
California City	Hanford	Malibu	Rialto	Visalia
Calimesa	Hawaiian Gardens	Mammoth Lakes	Ridgecrest	Walnut
Camarillo	Hawthorne	Manhattan Beach	Rolling Hills	West Covina
Canyon Lake	Hemet	Maywood	Rolling Hills Estates	West Hollywood
Carpinteria	Hermosa Beach	McFarland	Rosemead	Westlake Village
Carson	Hesperia	Mission Viejo	San Bernardino	Westminster
Cathedral City	Hidden Hills	Monrovia	San Buenaventura	Whittier
Cerritos	Highland	Montclair	San Dimas	Woodlake
Chino	Huntington Beach	Montebello	San Fernando	Yorba Linda
Chino Hills	Huntington Park	Monterey Park	San Gabriel	Yucaipa
Claremont	Indian Wells	Moorpark	San Jacinto	Yucca Valley
Commerce	Industry	Moreno Valley	San Marino	
Compton	Inglewood	Murrieta	Santa Ana	
Corona	Irvine	Newport Beach	Santa Barbara	
Costa Mesa	Irwindale	Norco	Santa Clarita	
Covina	La Canada Flintridge	Norwalk	Santa Fe Springs	

\*SCE provides electric service to a small number of customer accounts in Tuolumne County and is not subject to franchise requirements.

**Appendix C**

**SCE Summary Of Earnings**



**Southern California Edison  
Summary of Earnings  
2008 GRC-Related Adopted Revenue Requirement <sup>1/</sup>  
Thousands of Dollars**

Line No.	Item	Total
1.	<b>Base Revenues</b>	4,113,324
2.	<b>Expenses:</b>	
3.	Operation & Maintenance	1,874,463
4.	Depreciation	882,131
5.	Taxes	617,599
6.	Revenue Credits	(170,624)
7.	Total Expenses	3,203,569
8.	<b>Net Operating Revenue</b>	909,755
9.	<b>Rate Base</b>	10,397,198
10.	<b>Rate of Return</b>	8.75%

<sup>1/</sup> D.06-05-016/Advice Letter 2176-E and 2196-E  
Includes one SONGS 2&3 refueling and maintenance outage

**Appendix D**

**SCE'S Notice of Application Regarding Proposed Changes in Electric Rates**

NOTICE OF FILING

**NOTIFICATION OF APPLICATION FILING REGARDING  
PROPOSED INCREASE IN ELECTRIC RATES  
APPLICATION NO. A.09-04-XXX**

On April 3, 2009, Southern California Edison Company (SCE) filed Application No. 09-04-XXX with the California Public Utilities Commission (CPUC) seeking approval for SCE to recover costs of up to \$30 million to co-fund a feasibility study. The study will determine the technical feasibility and commercial reasonableness of an Integrated Gasification Combined Cycle (IGCC) facility with carbon capture for use in Enhanced Oil Recovery (EOR) with sequestration. The facility is referred to as Hydrogen Energy California (HECA). If shown to be technically feasible and commercially reasonable, the HECA facility will provide low-carbon, baseload electricity within California by gasifying non-conventional fuel resources (primarily petroleum coke from California's oil refineries or, as needed, blends of petroleum coke and other solid fuels) to produce hydrogen for electricity generation through an IGCC plant and capture the CO<sub>2</sub> for EOR with storage. This application is referred to as A.09-04-XXX.

In this application, SCE requests the CPUC to approve an increase of \$30.300 million in electric rates starting in 2010. If approved by the CPUC, the electric revenue requirement will increase electric rates by approximately 0.274% annually. You will see a rate increase in your monthly bill beginning in 2010.

**ILLUSTRATIVE EFFECT ON ELECTRIC RATES AND BILLS**

The requested revenue requirement increase results in an annual increase of \$30.300 million<sup>46</sup> or 0.274% beginning January 1, 2010, when compared to total system revenues at present rates (as of March 2009). If the total rates were to change as requested, an average residential electric customer using 600 kilowatt-hours per month would see an increase of \$0.14 per month, from \$81.93 to \$82.07. The following table shows an estimate of proposed revenues and rate changes by customer group:

<b>CUSTOMER GROUP REVENUE IMPACT For January 1, 2010 implementation</b>		
Customer Group	Revenue Change (\$Thousands)	% Change
Residential	11,582	0.270%
Lighting - Small and Medium Power	11,264	0.279%
Large Power	6,330	0.278%
Agricultural and Pumping	929	0.277%
Street and Area Lighting	195	0.152%
<b>TOTAL</b>	<b>30,300</b>	<b>0.274%</b>

<sup>46</sup> This amount includes a provision for Franchise Fees and Uncollectible Accounts Expense, consistent with Commission practice and procedure.

## EVIDENTIARY HEARINGS

The CPUC may hold evidentiary hearings whereby formal parties of record provide testimony and are subject to cross-examination before the CPUC's Administrative Law Judge (ALJ). These hearings are open to the public, but only those who are formal parties of record can participate. The CPUC has their own court reporters who will record the comments of those formal parties of record participating in the evidentiary hearings. After considering all proposals and evidence presented during the formal hearing process, the assigned ALJ will issue a proposed decision. When the CPUC issues a final decision on the application, it may adopt, amend, or modify all or part of the ALJ's proposed decision as written. The CPUC's decision may be different than SCE's request.

### FOR FURTHER INFORMATION FROM SCE

As noted above, you may review a copy of this Application and related exhibits at SCE's corporate headquarters (2244 Walnut Grove Avenue, Rosemead, CA 91770). You may also view these materials at the following SCE business offices:

1 Pebbly Beach Rd. Avalon, CA 90704	30553 Rimrock Rd. Barstow, CA 92311	374 Lagoon St., Bishop, CA 93514
505 W. 14 <sup>th</sup> Ave. Blythe, CA 92225	3001 Chateau Rd. Mammoth Lakes, CA 93546	510 S. China Lake Blvd., Ridgecrest, CA 93555
26364 Pine Ave. Rimforest, CA 92378	41694 Dinkey Creek Rd. Shaver Lake, CA 93664	421 W. J St., Tehachapi, CA 93561
120 Woodland Dr., Wofford Heights, CA 93285	6999 Old Woman Springs Rd. Yucca Valley, CA 92284	

Customers with internet access may view and download SCE's application and the papers supporting it on SCE's web site, [www.sce.com](http://www.sce.com). Anyone who would like to obtain more information about the application, please write to:

Southern California Edison Company  
P.O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, CA 91770  
Attention: Case Administration

Para solicitar una copia de esta notificación en español por favor escriba a:

Southern California Edison Company  
2244 Walnut Grove Avenue, Quad 4A  
Rosemead, CA 91770

***a la atención de Comunicaciones Corporativas o por medio de correo electrónico a [gabby.garcia@sce.com](mailto:gabby.garcia@sce.com).***

**THE CPUC WELCOMES YOUR PARTICIPATION AND COMMENTS**

The Division of Ratepayer Advocates (DRA) is an independent arm of the CPUC, created by the Legislature to represent the interests of all utility customers throughout the state to obtain the lowest possible rates for service consistent with reliable and safe service levels. DRA has a multi-disciplinary staff with expertise in economics, finance, accounting, and engineering.

You may submit written comments to CPUC’s Public Advisor’s Office at the address or e-mail shown below. Please state that you are writing concerning SCE’s application A.09-04-XXX. Your comments will become a part of the formal correspondence file for public comment in this proceeding. The Public Advisor’s Office will circulate your comments to the five Commissioners, the ALJ, DRA, and to CPUC staff assigned to this proceeding. You may also write to the CPUC if you need advice on how to participate in this proceeding, or would like to receive further notices regarding the date, time, and place of any hearing on SCE’s application. You may also review a copy of this Application and related exhibits at SCE’s corporate headquarters (2244 Walnut Grove Avenue, Rosemead, CA 91770). Finally, you may also review a copy of this Application and related exhibits at the CPUC’s main office in San Francisco, listed below.

The Public Advisor California Public Utilities Commission 320 West Fourth Street, Suite 500 Los Angeles, CA 90013  Or by e-mail: <i>Public.Advisor.la@cpuc.ca.gov</i>	The Public Advisor California Public Utilities Commission 505 Van Ness Avenue, Room 2103 San Francisco, CA 94102  Or by e-mail: <i>Public.Advisor@cpuc.ca.gov</i>
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April 2009

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commissioner's Rules of Practice and Procedure, I have this day served a true copy of APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR AUTHORIZATION TO RECOVER COSTS NECESSARY TO CO-FUND A FEASIBILITY STUDY OF A CALIFORNIA IGCC WITH CARBON CAPTURE AND STORAGE on all parties identified in the attached service list(s).

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 **3rd day of April, 2009**, at Rosemead, California.

/s/Raquel Ippoliti

Raquel Ippoliti

Project Analyst

SOUTHERN CALIFORNIA EDISON COMPANY

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