



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Integrate and )  
Refine Procurement Policies and Consider Long- )  
Term Procurement Plans. )

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Rulemaking 10-05-006  
(Filed May 6, 2010)

**MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO MODIFY**  
**THE SCHEDULE FOR TRACK II BUNDLED PROCUREMENT PLAN**

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Dated: **February 8, 2011**

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THE SCHEDULE FOR THE TRACK II BUNDLED PROCUREMENT PLAN**

Pursuant to Rule 11.1(a) of the California Public Utilities Commission’s (Commission or CPUC) Rules of Practice and Procedure, Southern California Edison Company (SCE) requests that the Commission modify the schedule for the Track II Bundled Plan. On January 13, 2010, the Assigned Commissioner and Administrative Law Judge’s Scoping Memo for Track II Bundled Procurement Plan established a due date of March 11, 2011, for the utilities to serve their proposed bundled procurement plans and supporting testimony (ALJ Scoping Memo). SCE requests a change in the schedule to allow it to serve its proposed bundled procurement plan and supporting testimony on March 25, 2011. SCE further requests that the assigned Administrative Law Judge (ALJ) establish a 5 business day response period for this short and simple motion.

SCE is not making this request lightly. SCE commenced work on the bundled customer procurement plan analysis specified in the ALJ Scoping Memo immediately after its issuance. SCE also initiated several communications with Energy Division staff to confirm the planning assumptions SCE should use in preparation of the Commission-required analysis and to provide updates on the status of SCE’s analysis. As a result of the clarifications provided by Energy Division staff, SCE performed preliminary analysis that indicated the standardized planning

assumptions would result in little to no demonstrated need for new renewable generation projects to meet California's 33% Renewables Portfolio Standard (RPS) goals in 2020. The other investor-owned utilities (IOUs) also had preliminary findings that led to a teleconference with the Energy Division staff on February 2, 2011, for the purpose of clarifying the standardized planning assumptions that the IOUs should employ for their Track II Bundled Procurement Plan submittals. In particular, the Energy Division staff's direction clarified the demand and RPS compliance assumptions to be included in the IOU's Track II Bundled Procurement Plan.

As a result of the clarified planning assumptions, SCE has restarted its analysis. The standardized planning assumptions underlie most of the analysis that will be prepared in support of the Track II filing and restarting the analysis is a comprehensive undertaking. SCE needs additional time to perform the Commission-required analysis,<sup>1</sup> review the Commission-required analysis for quality control, explain the results of the Commission-required analysis in testimony, and compare the Commission-required analysis to SCE's recommended analysis. SCE cannot complete all of these tasks and provide a high quality filing by March 11, 2011. Indeed, SCE has consistently requested and advocated for a two to three-month window in which to prepare its bundled procurement plan filing, depending on the amount of work required by the Commission. The ALJ Scoping Memo only provided two months, and more than two weeks were expended seeking clarification with Energy Division staff on the use of standardized planning assumptions. As a result, SCE is respectfully requesting a two week extension of its required filing date to March 25, 2011. Even with the requested extension, SCE believes that its staff will be required to work additional hours beyond their normal work schedules in order to complete the analysis required to support its Track II filing.

SCE recognizes that its request may impact other parties and suggests the following changes to the other dates in the ALJ Scoping Memo:

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<sup>1</sup> Analysis includes the development of 10-year fundamental power price forecasts using the standardized planning assumptions, simulated dispatch of existing and planned-for resources using the 10-year fundamental price forecast, position reporting, risk assessment, sensitivity calculations, and revenue requirement calculations.

<b>Date</b>	<b>Event</b>
April 29, 2011	Other parties serve their proposed bundled procurement plans and supporting testimony.
May 13, 2011	Concurrent reply testimony is served. Requests for evidentiary hearings are filed.
May 23-27, 2011	Evidentiary hearings (if necessary).

This schedule will still allow 10 days between the submission of reply testimony and the start of evidentiary hearings, but will also allow SCE to submit a high quality showing including the Commission-required analysis.

For all of the reasons stated above, SCE requests that the Commission allow it to serve its proposed bundled procurement plan and supporting testimony on March 25, 2011 and adopt a 5 business day reply period for this short and simple motion.

Respectfully submitted,

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February 8, 2011

**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 **MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO MODIFY THE SCHEDULE FOR THE TRACK II BUNDLED PROCUREMENT PLAN** 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 **8th day of February, 2011**, at Rosemead, California.

/s/ Melissa A. S. Hernandez

Melissa A. S. Hernandez

Project Analyst

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Utilities Commission

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