



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

**FILED**

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In the Matter of the Application of Southern  
California Edison Company (U 338-E)  
for Authority to, Among Other Things, Increase  
Its Authorized Revenues for Electric Service in  
2012, And to Reflect That Increase in Rates.

A.10-11-015

(Filed November 23, 2010)

**MOTION OF THE COUNTY OF LOS ANGELES REQUESTING LEAVE TO REPLY  
TO SOUTHERN CALIFORNIA EDISON'S RESPONSE TO MOTION FOR PARTY  
STATUS**

DAVID HUARD  
RANDALL W. KEEN  
TARA S. KAUSHIK  
Manatt, Phelps & Phillips, LLP  
One Embarcadero Center, 30th Floor  
San Francisco, California 94111  
Tel: (415) 291-7400  
Fax: (415) 291-7474  
E-mail: [dhuard@manatt.com](mailto:dhuard@manatt.com)  
[rkeen@manatt.com](mailto:rkeen@manatt.com)  
[tkaushik@manatt.com](mailto:tkaushik@manatt.com)

February 24, 2011

Attorneys for  
**County of Los Angeles**

**BEFORE THE PUBLIC UTILITIES COMMISSION  
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In the Matter of the Application of Southern California Edison Company (U 338-E) for Authority to, Among Other Things, Increase Its Authorized Revenues for Electric Service in 2012, And to Reflect That Increase in Rates.

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**1. INTRODUCTION**

Pursuant to Rule 11.1 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure, the County of Los Angeles ("LA County" or "the County") respectfully requests leave to reply to Southern California Edison's ("SCE") Response to Motions for Party Status Filed by the County of Los Angeles and California Black Chamber of Commerce ("Response") in the above captioned proceeding.

Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure, LA County respectfully submits a Proposed Ruling granting the specific relief requested, attached hereto.

**2. BACKGROUND**

Pursuant to the direction of the presiding Administrative Law Judge, LA County filed a Motion for Party Status in response to Application ("A.")10-11-015 on February 10, 2011 and identified issues that it intended to address in Phase I of SCE's General Rate Case ("GRC")

Proceeding, including, but not limited to, the level of funding for energy efficiency programs made available to LA County.

SCE filed its Response on February 14, 2011. In its Response SCE asserts that energy efficiency issues are outside the scope of the “[a]ll issues related to energy efficiency policies, administration, and programs are examined on a triennial basis through a separate application.”<sup>1</sup>

SCE has mischaracterized the scope of this proceeding. Accordingly, LA County hereby requests leave to file a reply in order to address SCE’s assertions regarding the scope of A.10-11-015.

### **3. GRANTING LEAVE TO REPLY IS CONSISTENT WITH COMMISSION PRECEDENT**

The Commission has long recognized that fairness dictates that parties have the opportunity to respond to affirmative assertions that are made in reply pleadings in the interest of developing a full record.<sup>2</sup> In this case, fairness dictates that LA County have the opportunity to respond to SCE’s mischaracterization of the scope of issues raised by SCE’s own exhibits offered in support of A.0-10-11-015.

### **4. CONCLUSION**

For the reasons stated herein, LA County respectfully requests that the Administrative Law Judge grant LA County’s request for leave to file the attached reply in the above captioned proceeding.

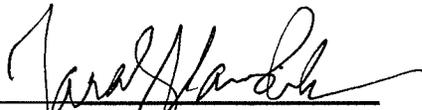
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<sup>1</sup> Response, p. 2.

<sup>2</sup> D.98-12-026, *Order Instituting Rulemaking to Establish Standards of Conduct Governing Relationships Between Energy Utilities and Their Affiliates*, *Order Instituting Investigation to Establish Standards of Conduct Governing Relationships Between Energy Utilities and Their Affiliates*, 1998 Cal. PUC LEXIS 754, \*\* 5-6.

Dated: February 24, 2011

Respectfully submitted,

By:   
Tara S. Kaushik

DAVID HUARD  
RANDALL W. KEEN  
TARA S. KAUSHIK  
Manatt, Phelps & Phillips, LLP  
One Embarcadero Center, 30th Floor  
San Francisco, California 94111  
Tel: (415) 291-7400  
Fax: (415) 291-7474  
E-mail: [dhuard@manatt.com](mailto:dhuard@manatt.com)  
[rkeen@manatt.com](mailto:rkeen@manatt.com)  
[tkaushik@manatt.com](mailto:tkaushik@manatt.com)

Attorneys for  
**County of Los Angeles**

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

In the Matter of the Application of Southern California Edison Company (U 338-E) for Authority to, Among Other Things, Increase Its Authorized Revenues for Electric Service in 2012, And to Reflect That Increase in Rates.

Application No. 10-11-015

(Filed November 23, 2010)

**[PROPOSED] ADMINISTRATIVE LAW JUDGE'S RULING ON MOTION OF THE COUNTY OF LOS ANGELES REQUESTING LEAVE TO REPLY TO SOUTHERN CALIFORNIA EDISON'S RESPONSE TO MOTION FOR PARTY STATUS**

On February 24, 2011, the County of Los Angeles ("LA County") requested leave to file a reply to Southern California Edison's Response to Motions for Party Status Filed by the County of Los Angeles and California Black Chamber of Commerce in the above captioned proceeding. LA County's request for leave to file a reply is consistent with precedent of the California Public Utilities Commission and serves the interest of developing a full record in this proceeding.

Therefore, IT IS RULED that, good cause appearing,

1. The request of LA County for leave to reply to Southern California Edison's Response to Motions for Party Status Filed by the County of Los Angeles and California Black Chamber of Commerce is granted.

Dated \_\_\_\_\_, 2011 at San Francisco, California.

\_\_\_\_\_  
Administrative Law Judge

**PROOF OF SERVICE**

I, Rita Mehler, declare as follows:

I am employed in the City and County of San Francisco, California. I am over the age of eighteen years and not a party to this action. My business address is MANATT, PHELPS & PHILLIPS, LLP, One Embarcadero Center, 30th Floor, San Francisco, California 94111-3719. On February 24, 2011, I served the within:

***MOTION OF THE COUNTY OF LOS ANGELES REQUESTING LEAVE TO REPLY TO SOUTHERN CALIFORNIA EDISON'S RESPONSE TO MOTION FOR PARTY STATUS***

on the interested parties in this action addressed as follows:

*See attached service list*

- (BY CPUC E-MAIL SERVICE)** By transmitting such document electronically from Manatt, Phelps & Phillips, LLP, San Francisco, California, to the electronic mail addresses listed above. I am readily familiar with the practice of Manatt, Phelps & Phillips, LLP for transmitting documents by electronic mail, said practice being that in the ordinary course of business, such electronic mail is transmitted immediately after such document has been tendered for filing. Said practice also complies with Rule 2.3(b) of the Public Utilities Commission of the State of California and all protocols described therein.
  
- (BY MAIL)** By placing such document(s) in a sealed envelope, with postage thereon fully prepaid for first class mail, for collection and mailing at Manatt, Phelps & Phillips, LLP, San Francisco, California following ordinary business practice. I am readily familiar with the practice at Manatt, Phelps & Phillips, LLP for collection and processing of correspondence for mailing with the United States Postal Service, said practice being that in the ordinary course of business, correspondence is deposited in the United States Postal Service the same day as it is placed for collection.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on February 24, 2011, at San Francisco, California.



Rita Mehler

**CPUC E-Mail Service List**  
**A.10-11-015**  
**(Updated February 24, 2011)**

douglass@energyattorney.com  
marcel@turn.org  
JPong@SempraUtilities.com  
npedersen@hanmor.com  
mcnultfa@sce.com  
JPacheco@SempraUtilities.com  
carl.wood@verizon.net  
rochelle@a4nr.org  
hydroesq@schat.net  
dbyers@landuselaw.com  
rkoss@adamsbroadwell.com  
ljt@cpuc.ca.gov  
bfinkelstein@turn.org  
nes@a-klaw.com  
swf5@pge.com  
epoole@adplaw.com  
bcragg@goodinmacbride.com  
dhuard@manatt.com  
RobertGnaizda@gmail.com  
speesapati@earthjustice.org  
stephaniec@greenlining.org  
pucservice@dralegal.org  
jweil@aglet.org  
kmills@cfbf.com  
atrowbridge@daycartermurphy.com  
cleo.zagrean@macquarie.com  
jleslie@luce.com  
knakatani@calhrc.org  
lauren.duke@db.com  
naaz.khumawala@baml.com  
alison@bartlewells.com  
jheckler@levincap.com  
jcorralejo@lbcgla.org  
hchoy@isd.co.la.ca.us  
scegrc@sce.com  
kris.vyas@sce.com  
Russell.Worden@sce.com  
KMelville@SempraUtilities.com  
learl@SempraUtilities.com  
liddell@EnergyAttorney.com  
onell.soto@uniontrib.com  
marcie.milner@shell.com  
pgirard@semprautilities.com  
faith.mabuhayalliance@gmail.com  
dand2847@aol.com  
sue.mara@rtoadvisors.com  
mdjoseph@adamsbroadwell.com  
jstoddard@manatt.com  
pmarshall@manatt.com  
rkeen@manatt.com  
TKaushik@manatt.com  
aaron.joseph.lewis@gmail.com  
cem@newsdata.com  
lencanty@BlackEconomicCouncil.org  
dmarcus2@sbcglobal.net  
rschmidt@bartlewells.com  
brbarkovich@earthlink.net  
garrick@jbsenergy.com  
rmccann@umich.edu  
blaising@braunlegal.com  
steven@iepa.com  
lmh@eslawfirm.com  
roe@cpuc.ca.gov  
crv@cpuc.ca.gov  
ckt@cpuc.ca.gov  
esc@cpuc.ca.gov  
dlf@cpuc.ca.gov  
dfb@cpuc.ca.gov  
eg1@cpuc.ca.gov  
fvr@cpuc.ca.gov  
md2@cpuc.ca.gov  
psp@cpuc.ca.gov  
rmp@cpuc.ca.gov  
tbo@cpuc.ca.gov

**U.S. Mail Service List**  
**A.10-11-015**  
**(Updated February 24, 2011)**

Melanie Darling  
California Public Utilities Commission  
Division of Administrative Law Judges  
505 Van Ness Avenue, Room 4205  
San Francisco, CA 94102-3214

Melissa W. Kasnitz  
Disability Rights Advocates  
2001 Center Street, Fourth Floor  
Berkeley, CA 94704-1204  
For: Disability Rights Advocates

Kathleen M. Bellomo, Esq.  
Kathleen Maloney Bellomo  
P.O. Box 217  
Lee Vining, CA 93541  
For: Eastern Sierra Ratepayer Assn.