



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Application of Southern California Edison)
Company (U 338-E) for Authorization to: (1)) Application 04-02-026
Replace San Onofre Nuclear Generating Station) (Filed February 27, 2004)
Unit Nos. 2 & 3 (SONGS 2 & 3) Steam)
Generators; (2) Establish Ratemaking for Cost)
Recovery; and (3) Address Other Related Steam)
Generator Replacement Issues.)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY IN SUPPORT OF
PETITION FOR MODIFICATION OF DECISION NO. 05-12-040**

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Dated: **December 10, 2010**

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

Application of Southern California Edison)
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PETITION FOR MODIFICATION OF DECISION NO. 05-12-040**

Pursuant to Rule 16.4 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure and as authorized by Administrative Law Judge (ALJ) Jeffrey P. O'Donnell, Southern California Edison Company (SCE) submits the following reply in support of its Petition for Modification (Petition) of Decision (D.) 05-12-040, which approved the Steam Generator Replacement Project (SGRP) for San Onofre Nuclear Generating Station Units 2 & 3 (SONGS 2 & 3) and SGRP cost estimate. ALJ O'Donnell authorized SCE to file this reply by December 10, 2010 via a December 2, 2010 email to SCE's counsel.

I.

PRELIMINARY STATEMENT

SCE's Petition should be approved as filed. SCE's Petition presents a straightforward request that should be non-controversial. SCE is simply requesting that the Commission modify D.05-12-040 for the purpose of removing from the SGRP cost estimate the costs (approximately \$9.2 million, 2004 dollars) related to replacing and refurbishing certain components in the

SONGS 2 & 3 low and high pressure turbines (LPTs and HPTs). The turbine-related refurbishment work proposed in the SGRP has been replaced by a separate HPT retrofit project (HPT Project), which will also include a number of more extensive activities to completely replace additional turbine components. The Commission approved the HPT project for Unit 2 in SCE's 2009 General Rate Case (GRC).¹ SCE indicated in the 2009 GRC that it would file the instant Petition to remove these costs from the SGRP cost estimate if the Commission approved the HPT Project. This Petition is in support of that commitment. SCE has also included the remaining costs of the HPT Project in the 2010-2014 SONGS capital forecast for SCE's 2012 GRC. Therefore, the costs of the turbine-related work removed from the SGRP are captured by the forecasted costs for the Commission-approved HPT Project.

Because SCE removed the turbine-related work and associated costs from the SGRP, and included these costs in the HPT Project approved in D.09-03-025, the Commission should modify D.05-12-040 to reduce the SGRP cost estimate and cost cap to a revised total of \$670.8 million (2004 dollars). This will prevent double recovery of costs associated with this work.

II.

ARGUMENT

DRA was the only party who opposed SCE's Petition. DRA essentially argues that the Commission should not revise the SGRP estimate on the following three grounds: (1) the costs of both the turbine-related work initially included in the SGRP and the more extensive HPT Project were incorporated as contingencies in the SGRP and should be reflected in the SGRP estimate; and (2) SCE is prohibited from by D.05-12-040 from reducing the SGRP estimate. DRA also argues, without completing any analysis, that the SGRP and HPT Project are not cost-effective. As explained below, DRA's opposition is without merit. DRA presents a flawed understanding of the SGRP cost estimate approved by D.05-12-040, and grossly

¹ Decision (D.)09-03-025. The HPT Project costs were not included in the costs disallowed by the Commission in this decision.

mischaracterizes the costs that SCE is requesting the Commission to remove. In addition, DRA ignores the evidentiary record for the SGRP proceeding, and improperly relies on SGRP cost-effectiveness scenarios that are not applicable or relevant here. SCE responds to DRA's specific arguments below.

III.

DISCUSSION

A. The Costs of the Turbine-Related Work Removed from the SGRP Should Not Be Reflected in the SGRP Cost Estimate and Cost Cap.

DRA characterizes the costs of the turbine-related work initially included in the SGRP as a contingency in the SGRP, and then relies on that characterization to argue that those costs and the costs of the more expansive HPT Project are contingencies that should be reflected in the SGRP cost estimate and cost cap authorized by the Commission in D.05-12-40.² DRA is wrong.

First, the costs of the turbine-related work initially included in the SGRP are not contingencies. Rather, SCE included specific line item estimates for this turbine work in its SGRP cost estimate.³ Because SCE has removed these specific line items from the SGRP and included them in the HPT Project approved by the Commission, it is appropriate to remove these line items from the SGRP cost estimate. This is what SCE's Petition requests the Commission to do here.

Second, DRA fundamentally misunderstands (or ignores) that the HPT Project is a wholly distinct capital project that the Commission has approved in the GRC, wholly apart from the SGRP. As indicated in SCE's Petition and supporting documents, the turbine-related work initially included in the SGRP estimate was part of a narrowly-scoped turbine refurbishment

² DRA Response at pp. 1-2.

³ See Attachment B to SCE's Petition, which provides the SGRP detailed line item cost estimate approved in D.05-12-040. Attachment C to SCE's Petition provides a summary of the specific line items that SCE has removed from the SGRP and that should therefore be removed from the SGRP cost estimate.

project, related to replacing the steam generators for SONGS 2 & 3 only in the timing of the work to be completed.⁴ Indeed, the principal activity for the turbine-related work included in the SGRP was going to be replacing the HPT diaphragms (fixed blades).⁵ In contrast, the HPT Project will involve the same diaphragm (fixed blades) work and several other more extensive activities including replacing the HPT rotors and moving blades with new rotors and blades.⁶ Moreover, the HPT Project will increase SONGS power output by about 48MW.⁷ In short, the HPT Project is substantially different in scope and will have a different results than turbine work removed from the SGRP, analogous, for example, to the difference between an engine tune-up and a complete engine overhaul that may involve some similar activities but are substantially different in scope and results.

Further, SCE included the costs of the HPT Project in the 2007-2011 SONGS capital forecast for SCE's 2009 GRC.⁸ The forecasted project costs for the HPT Project included both the estimated costs of the turbine-related work initially included in the SGRP, and the estimated costs of the more extensive activities to replacing the HPT rotors and moving blades, a substantially different project.⁹ In its supporting GRC testimony, SCE also provided a cost estimate summary and cost-effectiveness analysis for the new project.¹⁰ The Commission approved the SONGS capital forecast in D.09-03-025. Consequently, the costs of the HPT Project, including the turbine work removed from the SGRP, cannot fairly be considered as

⁴ Petition at pp. 3-4, fn. 4; *See also* A.07-11-011, SCE-02, Volume 5 – “*SONGS 2 & 3 High Pressure Turbine Project*” (SCE’s 2009 GRC HPT Project Testimony), and A.10-11-015, SCE-02, Volume 2 – “*SONGS 2 & 3 Capital Expenditures Chapters I-III*” at pp. 22-25 (SCE’s 2012 GRC SONGS Capital Forecast Testimony). SCE’s SONGS capital forecasts for the 2009 and 2012 GRCs provide a description of the HPT Project and cost-effectiveness analysis.

⁵ *See* Attachment B to SCE’s Petition.

⁶ *See* SCE’s 2009 GRC HPT Project Testimony, and SCE’s 2012 GRC SONGS Capital Forecast Testimony. SCE’s SONGS capital forecasts for the 2009 and 2012 GRCs provide a description of the HPT Project and cost-effectiveness analysis

⁷ *See* SCE’s 2009 GRC HPT Project Testimony, and SCE’s 2012 GRC SONGS Capital Forecast Testimony.

⁸ *See* SCE’s 2009 GRC HPT Project Testimony.

⁹ The testimony for SCE’s 2009 and 2012 GRCs both indicate that SCE has removed turbine-related work from the SGRP and included those costs in the HPT Project, and that SCE would file a petition for modification or other appropriate document to remove those costs from the SGRP estimate.

¹⁰ *See* SCE’s 2009 GRC HPT Project Testimony, and SCE’s 2012 GRC SONGS Capital Forecast Testimony.

contingency in the SGRP. D.09-03-025 approved these costs as HPT Project costs, separate from the SGRP.

Indeed, the SCE's inclusion of HPT Project costs in the SONGS capital forecast for SCE's 2009 and 2012 GRCs is precisely the reason why the Commission should remove the costs of the turbine-related work initially included in the SGRP. The costs for this work have been approved by the Commission in two separate decisions: (1) for the SGRP (D.05-12-040) and (2) for the 2009 GRC (D.09-03-025). SCE will only complete the work in the HPT Project. Therefore, it is appropriate that the Commission should remove the costs from the SGRP cost estimate given the Commission approval of the HPT project.

B. Commission Rule 16 Provides Authority for SCE to Submit the Petition for Modification.

DRA also argues that there is no provision in the D.05-12-040 for "manipulating" the SGRP cost estimate and cost cap.¹¹ This argument is nonsensical and plainly ignores the Commission's procedural rules. The Commission generally does not provide authority for making modifications to a decision within the decision itself, which typically closes the proceeding. Commission Rule 16 provides this authority, expressly allowing parties to submit "a petition for medication [that] asks the Commission to make changes to an issued decision." Therefore, SCE does not need to identify a provision in D.05-12-040 authorizing its petition for modification. SCE appropriately filed its petition in accordance with Rule 16.

On a related note, DRA argues that because the Commission has not decided SCE's 2012 GRC, which provides the remaining costs of the HPT Project in the 2010-2014 SONGS capital forecast, the Commission cannot make a ruling on SCE's Petition.¹² DRA misses the point. As indicated in SCE's 2009 and 2012 GRC submissions, SCE will not complete turbine-related

¹¹ DRA's Response at p. 2.

¹² *Id.*

refurbishment work in the SGRP.¹³ Therefore, even if the Commission were to reverse D.09-03-025, which approved the HPT Project, it is appropriate to remove the estimated costs of this refurbishment work from the SGRP cost estimate, given that SCE is not completing the work contemplated in the SGRP cost estimate.

C. The Cost-Effectiveness of the HPT Project and the SGRP Are Not Relevant Issues.

DRA raises two separate arguments regarding the cost effectiveness of the SGRP and HPT Project. According to DRA, who conducted no analysis here and ignores the evidentiary record for the SGRP proceeding, the two projects are not cost effective. Even if those arguments were applicable or relevant here (and they are not), they are completely incorrect.

DRA speculates that SCE considered the expanded HPT Project during SCE's design of the SGRP and rejected the HPT Project as not being cost-effective. DRA's unsubstantiated assumption regarding the cost-effectiveness of the HPT Project is incorrect. In fact, DRA ignores the evidentiary record for the SGRP proceeding, which identifies the benefits of the various scopes of turbine-work considered.¹⁴ In addition, SCE also included a cost-effectiveness analysis for the HPT Project in the 2009 and 2012 GRCs, demonstrating the cost-effectiveness of the project.¹⁵ DRA also ignores information provided by SCE in response to a DRA's data request on SCE's Petition (DRA-SCE-1_SGRP), which included copies of the HPT Project cost-effective analysis and other supporting materials regarding the HPT Project.¹⁶

DRA also cites to the "Table of Results" in D.06-11-024, which lists the cost-effectiveness scenarios considered by the Commission in the underlying SGRP proceeding.¹⁷ DRA suggests that the Commission should re-examine the cost-effectiveness of the SGRP.¹⁸

¹³ See SCE's 2009 GRC HPT Project Testimony, and SCE's 2012 GRC SONGS Capital Forecast Testimony.

¹⁴ See Attachment 1 to this Reply -- Document No. SGR—A10061 (identifying the "Element of Benefit", including power increases, for the various scopes of turbine-work considered in the SGRP).

¹⁵ See SCE's 2009 GRC HPT Project Testimony, and SCE's 2012 GRC SONGS Capital Forecast Testimony.

¹⁶ See Attachment 2 to this Reply – Written Response to DRA-SCE-1_SGRP.

¹⁷ DRA's Response at p. 4.

¹⁸ *Id.*

According to DRA, the HPT Project is a non-cost-effective SGRP contingency that results in higher SGRP costs or capital additions.¹⁹ As explained above, however, the cost effectiveness of the HPT Project is a separate issue properly considered in the GRC, not in this proceeding. In addition, the “Table of Results” or cost-effectiveness scenarios cited by DRA are not applicable, given that many of the assumptions used to develop those scenarios are no longer valid, including for example the assumption that SONGS co-owners do not participate in the SGRP.

IV.

CONCLUSION

For the reasons discussed above, SCE respectfully requests that the Commission modify D.05-12-040, as set forth above and in Attachment A to SCE’s Petition.

¹⁹ *Id.*

Respectfully submitted,

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December 10, 2010

Attachment 1

Attachment 2

**Southern California Edison
SGR A.04-02-026**

DATA REQUEST SET DRA-SCE-1_SGRP

**To: DRA
Prepared by: Katie Blakeslee
Title: Manager
Dated: 10/20/2010**

Received Date: 10/20/2010

Question 01:

Please provide complete copies of all documents, including memoranda, reports, work orders, meeting minutes, etc., evincing the chronology of SCE's decision to expand the scope of the work on the Low and High Pressure Turbines from installing new stage 1 diaphragm and old stage 2 and 3 diaphragms, a.k.a. "Case 2," See "SONGS 2 & 3 Steam Cost Generator Replacement Project, TSG Installation Cost Estimate – Contingency Development", p. B-2, items 1.03.01 and 1.03.02 and "Document No. SGR – A10061," dated 8/14/2002, Appendix 1, "No Power Upgrade Cases," page 1 of 2. to the new High Pressure Turbine Project (to be filed in SCE's 2012 GRC). SCE's response must include complete copies of the case studies from the original 2002 cost-benefit analyses and of the most recent cost-benefit analyses supporting the new, expanded work scope on the Low and High Pressure Turbines.

Response to Question 01:

General Objections

SCE objects to the request on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to the Commission's resolution of SCE's Petition to Modify Decision (D.) 05-12-040. As indicated in the Petition to Modify, SCE included a cost-effectiveness analysis for the High Pressure Turbine retrofit project (HPT Project) in its 2009 General Rate Case (GRC), which the Commission approved in D.09-03-025 (2009 GRC Decision). Accordingly, the cost-effectiveness of the HPT Project is not an issue in this proceeding. SCE also objects to the request on the grounds that it is vague and ambiguous regarding the phrase "evincing the chronology of SCE's decision to expand the scope of work on the Low and High Pressure Turbines." In an abundance of caution, SCE is interpreting the request as also seeking information regarding SCE's decision to complete the HPT Project, including the cost-effectiveness analysis for the HPT Project. SCE further objects to the request to the extent it seeks information protected by the attorney-client privilege and attorney-work product doctrine.

Without waiving any of these objections, SCE provides the following response:

Response

SCE has not identified any documents responsive to DRA's request regarding SCE's decision to "expand" the scope of turbine-related work originally included in the SGRP and complete the HPT Project for SONGS 2 & 3. However, SCE is producing the following documents regarding SCE's decision to complete the HPT Project: (1) HPT White Paper (Attachment A); and (2) a February, 2007 presentation providing a cost-effectiveness summary of the HPT Project (Attachment B).

In addition, as indicated in SCE's Petition to Modify , SCE completed a cost-effectiveness analysis for the HPT Project, discussed in SCE's 2009 General Rate Case (GRC), A.07-11-011, SCE-02, Volume 5 – "*SONGS 2 & 3 High Pressure Turbine (HPT) Project.*" In accordance with the general rate case plan, SCE also included the costs of the SONGS 2 portion of HPT Project in the 2007-2011 SONGS capital forecast for SCE's 2009 GRC. SCE will include the remaining costs of the SONGS 2 portion and the costs of the SONGS 3 portion in the 2010-2014 SONGS capital forecast for SCE's 2012 GRC. SCE respectfully refers DRA to SCE's 2009 GRC testimony (SCE-02, Volume 5) and to SCE's Notice of Intent for the 2012 GRC (SCE-02, Volume 2) for this information.

Finally, as requested, SCE is producing complete copies of the case studies from the original 2002 cost-benefit analyses for the SGRP (Attachment C).



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 **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY IN SUPPORT OF PETITION FOR MODIFICATION OF DECISION NO. 05-12-040** 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 **10th day of December, 2010**, at Rosemead, California.

/s/ Andrea Moreno

Andrea Moreno
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