BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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Application of the Division of Ratepayer Advocates and The Utility Reform Network for Rehearing of Resolution E-4227 A Approving in Part and Denies in Part Southern California Edison's Request to Establish a Memorandum Account and Recover up to $30 Million in Costs For a California IGCC Study	A.09-04-006 (Filed April 3, 2009)

JOINT RESPONSE OF HYDROGEN ENERGY INTERNATIONAL LLC AND SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE APPLICATION FOR REHEARING OF DECISION 09-09-049 FILED BY THE DIVISION OF RATEPAYER ADVOCATES AND THE UTILITY REFORM NETWORK

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Dated: November 10, 2009

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I. INTRODUCTION

Pursuant to Rule 16.1(d) of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure, Southern California Edison Company ("SCE") and Hydrogen Energy International LLC ("HEI") jointly submit this response to the Application for Rehearing of Decision 09-09-049 ("Second Rehearing Request") filed October 26, 2009 by the Division of Ratepayer Advocates ("DRA") and The Utility Reform Network ("TURN").

II. BACKGROUND

This proceeding, and the Second Rehearing Request, arise from an advice letter filing (AL 2274-E) proceeding in which SCE requested the authority to establish a new memorandum account and to recover in rates up to $30 million in costs for co-funding a study of a new clean technology with HEI.

DRA and TURN filed their first Application for Rehearing on Resolution E-4227A on April 3, 2009. As a direct result of DRA's and TURN's initial protests, SCE's request for rate recovery arising out of the advice letter filing was denied pending the filing of an application

with the Commission requesting authority to recovery such costs.[1] Decision 09-09-049 denied rehearing of Resolution E-4227A, with one limited clarification of Ordering Paragraph No. 2 of the Resolution. That paragraph was changed from, "SCE is directed to fund up to $17 million for Phase I of the HECA Study and to record those expenditures in the HECAMA" to state, "SCE shall record no more than $17 million for Phase I of the HECA Study in the HECAMA."[2]

Also on April 3, SCE filed the application in A.09-04-008 ("Application") and that matter is currently the subject of a Proposed Decision that was issued on November 3, 2009. The Proposed Decision would approve the Application of SCE for authority to recover up to $30 million in costs necessary to co-fund Phase I and Phase II of the Hydrogen Energy California feasibility study ("HECA Feasibility Study") of a first-of-a-kind integrated gasification combined cycle ("IGCC") facility with carbon capture for use in enhanced oil recovery ("EOR") and sequestration ("CCS"). The Application is scheduled for Commission action on December 3, 2009.

III. RESPONSE

As discussed below, TURN's and DRA's request for rehearing should be summarily denied for the following reasons.

A. TURN And DRA Fundamentally Lack Standing As To The Basic Relief Requested.

Resolution E-4227A, as confirmed by D.09-09-049, concurred with the position of TURN and DRA that an application was necessary before ratepayers would be responsible for any costs but allowed for the creation of a memorandum account and the recording of costs in it.[3] TURN's and DRA's arguments for rehearing are based on a decision that agreed with their arguments and, indeed, resulted in the change noted above. Nevertheless, TURN and DRA continue to argue that there should be yet another rehearing based on essentially the identical facts and procedural circumstances that have already been resolved by the Commission.

[1] Resolution E-4227A, pp. 1, 8, 12.
[2] D.09-09-049, Ordering Paragraph 1.
[3] Resolution E-4227A, pp. 1, 8, 12; D.09-09-049, p. 3.

TURN and DRA are substantively arguing that the Commission cannot direct SCE to fund the HECA Feasibility Study. However, that is an issue that is exclusively within the interests of SCE because the Commission has not yet issued any decision that would impact SCE's ratepayers, and it is SCE that has the right to argue the issue—or not. Because DRA and TURN and the ratepayers they represent are unaffected by the Resolution, they lack standing to ask for relief which only SCE could have but did not request.

At its base, TURN and DRA argue that any language which directs SCE to do any act prejudges the outcome of any other proceeding—a position strongly rejected by the Commission several times, beginning in Resolution E-4227A and confirmed in D.09-09-049. In effect, the Second Rehearing Request reargues the same position about which the Commission has already ruled and does so because DRA and TURN remain discontent with the Commission's previous rulings.

B. TURN And DRA Improperly Seek To Reargue The Issues Raised In Their First Application For Rehearing.

As TURN and DRA concede, the Second Rehearing Request is no more than a request for a "rehearing on rehearing,"[4] which is contrary to Commission precedent and improperly rehashes the same arguments previously determined by the Commission in Resolution E-4227A and D.09-09-049, which denied the first Application for Rehearing of DRA and TURN.

In their Second Rehearing Request, DRA and TURN reassert two arguments that are nearly identical to the issues they raised in their first Application for Rehearing:

First Application for Rehearing[5]		Second Application For Rehearing
"This outcome is inconsistent with the Resolution's clear acknowledgement that ***an advice letter is not the appropriate procedural process*** to commit ratepayer funds due to the restrictions set forth in General Order 96-B..." (emphasis added) (p. 6, internal quotations omitted)		"As noted in the earlier application for rehearing, GO 96-B provides that an ***application (rather than an advice letter) is required***..." (emphasis added) (p. 4).

[4] Second Rehearing Request, p. 10.
[5] *Application for Rehearing of Resolution E-4227A*, filed April 3, 2009 ("First Application for Rehearing").

"[P]arties did not have the opportunity to address the ***extra record evidence*** the Commissioners relied on in approving the Resolution." (emphasis added) (p.11)		"[T]he Commission should grant rehearing on the question of reliance on ***extra-record evidence***." (emphasis added) (p.10)

As this comparison indicates, the Second Rehearing Request essentially raises no new issues that DRA and TURN have not previously raised. The language might be slightly modified but the issues remain the same. TURN and DRA characterize the Second Rehearing Request as a response to new issues raised in D.09-09-049,[6] but a review of the actual arguments shows that characterization to be incorrect. The only change that the Commission made in D.09-09-049 was to modify Ordering Paragraph No. 2 of Resolution E-4227A to state, "SCE shall record no more than $17 million for Phase I of the HECA Study in the HECAMA."[7] Other than this limited clarification, D.09-09-049 does not modify the Commission's previous determinations as to either of the two issues raised in the Second Rehearing Request. Therefore, the Second Rehearing Request is unwarranted and improper.

1. The Second Rehearing Request Should Be Denied As Decision 09-09-049 Provides Clarification And Does Not Adopt A New Resolution.

In the Second Rehearing Request, DRA and TURN concede that "the Commission typically does not consider an application for rehearing where the decision at issue itself addressed an earlier application for rehearing."[8] This general rule unequivocally provides that a second application for rehearing of a decision on rehearing is ***not appropriate where the contested rehearing decision does not adopt a new resolution***. In D.02-04-065, the Commission explained, "[t]he modifications made to [the underlying decision] in the Rehearing Decision did not adopt a new resolution...Instead, the modifications merely clarified our [underlying decision]."[9] Thus, a party cannot take a second opportunity to assert its arguments

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[6] Second Rehearing Request, p. 3.

[7] D.09-09-049, *Application of the Division of Ratepayer Advocates and The Utility Reform Network for Rehearing of Resolution E-4227A Approving in Part and Denies in Part Southern California Edison's Request to Establish a Memorandum Account and Recover up to $ 30 Million in Costs For a California IGCC Study*, 2009 Cal. PUC LEXIS 498 ("D.09-09-049, 2009 Cal. PUC LEXIS 498"), *15, Ordering ¶1.

[8] Second Rehearing Request, p. 10 (citing, D.02-04-065, *Order Instituting Rulemaking into Implementation of Public Utilities Code Section 390*, 2002 Cal. PUC LEXIS 261 ("D.02-04-065, 2002 Cal. PUC LEXIS 261"); *Toward Utility Rate Normalization v. Public Utilities Com*. (1978) 22 Cal. 3d 529, 536-537).

[9] D.02-04-065, 2002 Cal. PUC LEXIS 261 at *5.

simply because a decision on rehearing clarifies the underlying decision.

In this proceeding, the ***only*** change the Commission made in D.09-09-049 to the underlying decision was to modify Ordering Paragraph No. 2 of Resolution E-4227A from "SCE is directed to fund" to "SCE shall record no more than" $17 million for Phase I of the HECA Feasibility Study.[10] The Commission explained that it made this sole modification to the underlying resolution "for purposes of clarification."[11] Clearly, this clarification does not amount to the adoption of a new position that has not been previously addressed. Therefore, TURN and DRA have no basis to reassert arguments that the Commission has previously rejected.

2. The Second Rehearing Request Is Improperly Filed As Decision 09-09-049 Did Not Raise Any New Issues.

DRA and TURN attempt to cast their Second Rehearing Request as a narrow exception to the general rule that prohibits an application for rehearing of a decision on rehearing.[12] However, this narrow exception does not apply here.

In the matter cited by DRA and TURN, *Ortega v. AT&T Communications*, D.97-12-052, 1997 Cal. PUC LEXIS 1128, the Administrative Law Judge ("ALJ") issued a first rehearing decision that addressed, ***for the first time***, a recently passed federal statute concerning telecommunications. The new federal statute included language on preemption that the parties had not previously addressed, but the ALJ interpreted that language in the first rehearing decision in a manner that could have substantially affected the parties' rights going forward. As a result, in a second rehearing decision, the Commission vacated the ALJ's prior interpretation of the new statutory language because the parties had not had the opportunity to address the statute or the implications of the ALJ's interpretations.[13] Clearly, the Commission applied an exception to the general rule that bars a second application for rehearing, because of the unique

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[10] D.09-09-049, 2009 Cal. PUC LEXIS 498, *15, Ordering ¶1.
[11] *Id.* at **2-3.
[12] Second Application for Rehearing, pp. 10-12.
[13] D.97-12-052, *Philip Ortega, Complainant, v. AT&T Communications of California, Inc., Defendant.; Centro Legal de la Raza et al., Complainants, v. AT&T Communications of California, Inc., Defendant*, 1997 Cal. PUC LEXIS 1128 ("D.97-12-052, 1997 Cal. PUC LEXIS 1128") at *2.

circumstances in which the first rehearing decision relied substantially on a new federal statute that was raised for the first time in the first rehearing order, and in which it was interpreted incorrectly.

Contrary to the bare assertions of DRA and TURN, the facts of *Ortega* are not present here. Unlike *Ortega*, where the parties encountered an issue not previously addressed, as clearly shown above, DRA and TURN have previously addressed all of the issues raised in their Second Application for Rehearing. Therefore, the Commission should follow the general rule prohibiting a second application for rehearing because the narrow exception to that general rule articulated by *Ortega* does not apply in this matter.

C. The Issues Raised By TURN And DRA Have Been Fully Aired And Considered By The Commission.

The Commission has already addressed the issues raised in the Second Rehearing Request—first in Resolution E-4227A, and second in D.09-09-049. This second rehearing request appears to be an attempt to affect the Proposed Decision in A.09-04-008, which was the subsequent application proceeding the Commission ordered at the request of TURN and DRA.

In Resolution E-4227A, the Commission addressed the advice letter filing issue that TURN and DRA raised by authorizing SCE to record costs in a memorandum account and ordering SCE to file an application for authority to recover costs from its ratepayers.[14] The Commission specifically stated:

> This order to SCE to fund Phase I of the HECA feasibility study ***does not prejudge*** the Commission's review of any subsequent SCE application.[15]

The Commission clearly contemplated that the positions of DRA and TURN would be fully vetted in an application proceeding to determine whether SCE should recover costs from its ratepayers for the HECA Feasibility Study. Consistent with the express order of the Commission, SCE filed its application in A.09-04-008, in which proceeding TURN and DRA

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[14] Resolution E-4227A, *The Commission Approves in Part and Denies in Part Southern California Edison's Request to Establish a Memorandum Account and Recover up to $30 Million in Costs for a California IGCC Study,* dated February 20, 2009 ("Resolution E-4227A"), pp. 1-2.

[15] Emphasis added. Resolution E-4227A, pp. 1-2.

submitted testimony, cross-examined witnesses, and participated in evidentiary hearings.

Not content with the Commission's conclusions in Resolution E-4227A, DRA and TURN filed their first Application for Rehearing restating the same arguments that they had raised in the advice letter filing process. Once again, the Commission addressed the positions of DRA and TURN in D.09-09-049, where the Commission specifically found that SCE's AL 2274-E was "consistent with our instruction in D.08-04-038 . . . for the filing of a Tier 3 advice letter."[16] In addition, the Commission fully considered and rejected the position of DRA and TURN that the Resolution was based on "extra-record" evidence.[17] The Commission correctly pointed out that the Resolution was based on the record evidence in SCE's advice letter filing, and that TURN and DRA had no basis for challenging Commissioners' comments at meetings which were not part of the underlying Decision at issue.[18]

Despite two rounds of arguments and Commission review of these issues, DRA and TURN attempt to raise them once again in the Second Rehearing Request. However, the Presiding Administrative Law Judge has considered the evidence at hearings and in prepared testimony submitted by the parties including DRA and TURN in A.09-04-008. As indicated in the Proposed Decision that is now subject to comments by the parties, the Commission noted that Resolution E-4227A authorized the recording of costs but directed SCE to file an Application for cost recovery from ratepayers, which would be subject to a reasonableness review based on evidence submitted by all parties.[19] That review has occurred based on the record evidence in A.09-04-008. Thus, all of the issues raised by DRA and TURN have been fully vetted in that proceeding.

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[16] D.09-09-049, 2009 Cal. PUC LEXIS 498, *6.
[17] D.09-09-049, 2009 Cal. PUC LEXIS 498, *13.
[18] *Id.*
[19] Proposed *Decision Approving Application*, filed November 3, 2009 in A.09-04-008 ("Proposed Decision"), pp. 4-5.

D. The Second Rehearing Request Fails As Decision 09-09-049 Contains No Unlawful Or Erroneous Provisions.

In addition to its disregard of previous Commission determinations, the Second Rehearing Request fails as a matter of law to show that D.09-09-049 is in any way unlawful or erroneous. Pursuant to Rule 16.1 of the Commission Rules of Practice and Procedure, an application for rehearing must set forth specifically the grounds on which the applicant considers the order or decision of the Commission to be unlawful or erroneous.[20] The Commission must reject as impermissible an application for rehearing that merely states or repeats conclusory allegations that fail to specify the unlawful or erroneous aspects of the order or decision.[21]

In the Second Rehearing Request, TURN and DRA take issue with the Commission's reliance on D.08-04-038 to find that SCE was authorized to file an advice letter concerning the HECA Feasibility Study.[22] There is nothing unlawful or erroneous about the Commission's reliance on its own precedent to make its determinations. On the contrary, it is consistent with the law for the Commission to rely on its policy or precedent to support its conclusions. DRA and TURN do not and cannot cite to any authority that would prohibit the Commission from relying on D.08-04-038 to find that SCE was justified in filing its AL 2274-E.

TURN and DRA also assert, as they did in their first Application for Rehearing, that the Commission improperly considered "extra-record evidence,"[23] but they do not cite to any authority to show that this consideration is unlawful or a legal error, nor do they prove their alleged point factually. On the contrary, it is proper and customary for a state agency to consider the existence and effects of a federal statute, and for commissioners to investigate matters independently, such as through use of the Commission's Energy Division staff and experts, as well as the expertise and research of their individual commissioners' staff, to support a

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[20] Rule 16.1(c); *see, also,* Pub. Util. Code § 1732.

[21] *See, e.g.,* D.09-01-039, *Order Instituting Rulemaking to Promote Policy and Program Coordination and Integration in Electric Utility Resource Planning; Order Instituting Rulemaking to Promote Consistency in Methodology and Input Assumptions in Commission Applications of Short-Run And Long-Run Avoided Costs, Including Pricing for Qualifying Facilities*, 2009 Cal. PUC LEXIS 6, **4-7 (rejecting an application for rehearing a decision on rehearing where the allegations raised by the appellants were merely an impermissible collateral attack of the original underlying decision rather than the rehearing decision itself).

[22] Second Rehearing Request, pp. 5-8.

[23] Second Rehearing Request, pp. 8-10.

commissioner's vote on matters. Thus, the Commission acted consistently with the law in D.09-09-049 and Resolution E-4227A.

Moreover, the Commission did not rely on evidence outside the record to support Resolution E-4227A. Pursuant to Public Utilities Code section 1757, the Commission may issue an order that is based on facts supported by "substantial evidence in light of the whole record." All the points alleged by the Second Rehearing Request to be "extra-record" are in fact within the record. The issue of the impact on federal grants and funding has consistently been raised in the comments and reply comments of SCE and HEI to the Alternate Draft.[24] The Commission also addresses this issue in its Resolution E-4227A,[25] which in addition to the comments and reply comments are all part of the record. As D.09-09-049 has correctly pointed out, DRA and TURN have ignored this evidence, which they claim is insufficient in their Second Rehearing Request.[26] However, as indicated above, the standard is not whether TURN and DRA find the record evidence to be sufficient, but whether the Commission's decision is based on ***substantial*** evidence in light of the entire record. Undoubtedly, the Commission has considered the record evidence at least three times in this proceeding and A.09-04-008, which has included a substantial amount of evidence to support the Commission's decision in light of the whole record. Accordingly, the assertion that this is a legal error is incorrect, regardless of how many times DRA and TURN argue otherwise.

IV. CONCLUSION

In sum, all of the arguments that DRA and TURN raise in the Second Rehearing Request are the same that they asserted throughout the advice letter filing process and their first application for rehearing. In their Second Rehearing Request, DRA and TURN rehash these same arguments, despite that the Commission has opined on them twice before. For the

[24] Comments in Support of Alternate Draft Resolution E-4227-A of Hydrogen Energy International LLC, served February 5, 2009, at p. 4; Reply Comments in Support of Alternate Draft Resolution E-4227-A of Hydrogen Energy International LLC, served February 11, 2009, at p. 3.
[25] Resolution E-4227A, at p. 5.
[26] D.09-09-049, 2009 Cal. PUC LEXIS 498, *13; Second Rehearing Request, p. 8.

foregoing reasons, SCE and HEI respectfully request that the Commission deny the Second Rehearing Request filed by DRA and TURN.

Dated: November 10, 2009

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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 JOINT RESPONSE OF HYDROGEN ENERGY INTERNATIONAL LLC AND SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE APPLICATION FOR REHEARING OF DECISION 09-09-049 FILED BY THE DIVISION OF RATEPAYER ADVOCATES AND THE UTILITY REFORM NETWORK 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 November, 2009**, at Rosemead, California.

/s/Raquel Ippoliti
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