

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of Southern California Edison
Company (U 338 E) for a Commission
Reasonableness Review of 2014 SONGS
2 & 3 Expenses.

Application 15-01-014
(Filed January 30, 2015)

**PROTEST
OF THE OFFICE OF RATEPAYER ADVOCATES**

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March 6, 2015

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Pursuant to Rule 2.6 of the Commission’s Rules of Practice and Procedure, the Office of Ratepayer Advocates (“ORA”) hereby protests the Application of Southern California Edison Company (“SCE”) for a Commission Reasonableness Review for 2014 SONGS 2 & 3 Expenses (“Application”).

I. DISCUSSION

In this application SCE requests a Commission finding that 2014 costs of \$221 million for San Onofre Nuclear Generation Station (“SONGS”) 2 & 3 are reasonable. SCE’s application is made in compliance with Commission Decision (D.) 14-11-040. That Decision approved a settlement agreement between ORA, TURN, SCE, SDG&E and other parties resolving rate recovery issues related to SONGS. In part, the agreement requires SCE to file “an application for the Commission to conduct a reasonableness review of recorded 2014 SONGS-related O&M or non-O&M expenses...whether recovered in general rates or from the Nuclear Decommissioning Trust.”¹ ORA agrees with SCE that “the principal to be considered in this application is the reasonableness of SCE’s 2014 SONGS O&M expenses.” (Application, p. 8). ORA agrees with SCE that this proceeding should be designated as ratesetting and that hearings will likely be necessary. (Application, pp. 7-8)

ORA will review SCE’s application and, evaluate the reasonableness and conduct an audit of the recorded 2014 numbers. Based on ORA’s active involvement in the 2015 Sempra General Rate Case, ORA auditors will not be available until May 2015. Therefore, ORA proposes the following schedule:

¹ Decision (D.) 14-11-040, Appendix B, Section 4.9 (h).

	SCE PROPOSED SCHEDULE	ORA PROPOSED SCHEDULE
Application Filed	January 30, 2015	
PHC		
Public Workshops	February/March 2015	April/May 2015
ORA & Intervenor Testimony	July 1, 2015	August 7, 2015
SCE Rebuttal	July 15, 2015	August 28, 2015
Hearings	Mid to late August, 2015	September 14-15, 2015
Opening Briefs	Mid to late August, 2015	TBD
Reply Briefs	September/October, 2015	TBD
Proposed Decision Issued	November, 2015	TBD

Respectfully submitted,

/s/ GREGORY HEIDEN

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