



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

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Application of SOUTHERN CALIFORNIA)
EDISON COMPANY (U 338-E), a California) A1505005 Application No. A.15-05-____
Corporation, to Open a 2015 Safety Model) (Filed May 1, 2015)
Assessment Proceeding)
_____)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
SAFETY MODEL ASSESSMENT PROCEEDING APPLICATION**

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Dated: **May 1, 2015**

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STATE OF CALIFORNIA**

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EDISON COMPANY (U 338-E), a California)
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I.

INTRODUCTION AND SUMMARY OF REASONS FOR APPLICATION

Pursuant to Sections 750 *et seq.* of the California Public Utilities Code, Rules 2.1 *et seq.* of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), and Decision (D.)14-12-025 of the Commission, Southern California Edison Company (SCE) makes this application to open a 2015 Safety Model Assessment Proceeding (SMAP). In the Decision, the Commission adopted a requirement that each of the large investor-owned utilities (IOUs) file an SMAP application by May 1, 2015.¹ The purpose of the SMAP application is:

[T]o provide Commission staff and other parties with the opportunity to analyze and understand the various models and methodologies that the energy utilities will be using to prioritize safety in their GRC proceedings. This prioritization of safety is to be achieved through the use of models and methodologies to assess the energy utility’s risk, and the mitigation measures the energy utility plans to take to reduce and minimize such risks.²

¹ The four applications are expected to be consolidated to “minimize the cost to the energy utilities and the parties interested in these issues, and [to] facilitate the goal of developing uniform and common standards for all of the energy utilities.” D.14-12-025, p. 27.

² D.14-12-025, p. 24.

The Decision required that the four large energy IOUs include in each SMAP filing descriptions of “how each utility assesses the risks to safety associated with its system and services, and the tools or activities that it plans to use to manage, mitigate, and minimize such risks.”³ Concurrent with the filing of this Application, SCE is serving testimony designed to serve the purpose of the SMAP as defined in the Decision. SCE’s testimony is organized into three sections with three separate witnesses, as follows:

Section	Title	Witness
I	Introduction	Michael R. Marelli
II	SCE’s Enterprise Risk Management Framework	Natalia Woodward
III	Risk-Informed Asset Management and Planning Illustrations	Shinjini C. Menon

³ D.14-12-025, p. 29.

II.
STATUTORY AND PROCEDURAL REQUIREMENTS

A. Statutory and Other Authority – Rule 2.1

Rule 2.1 requires that all applications: (1) clearly and concisely state the authority or relief sought; (2) cite the statutory or other authority under which that relief is sought; and, (3) be verified by the applicant. Rules 2.1(a), 2.1(b), and 2.1(c) set forth further requirements that are addressed separately below.

This application requests an order from the Commission opening a consolidated 2015 SMAP and processing of the 2015 SMAP to its conclusion. During the proceeding, with the input of all parties, SCE expects the parties to develop a risk lexicon based upon the terms jointly put forward by the major energy utilities. SCE expects the parties to review and discuss the risk models detailed in each utility's testimony, and to provide guidance on the expected content of the next SMAP, if one is deemed necessary. The authority under which this application is made includes D.14-12-025, the Commission's Rules of Practice and Procedure, and prior decisions, orders, and resolutions of this Commission.

B. Verification – Rules 2.1, 1.11

As required by Rules 2.1 and 1.11, this application has been verified by an officer, Ronald Nichols, SCE's Senior Vice President of Regulatory Affairs.

C. Legal Name and Correspondence – Rules 2.1(a) and 2.1(b)

Pursuant to Rules 2.1(a) and 2.1(b),⁴ SCE is a public utility organized and existing under the laws of the State of California. The location of SCE's principal place of business is: 2244 Walnut Grove Avenue, Rosemead, California.

Correspondence or communications regarding this application should be addressed to SCE's representative at the following address:

⁴ Rule 2.1(a) requires the application to state the exact legal name of the applicant and location of its principal place of business, and, if a corporation, the state under the laws of which the applicant was organized. Rule 2.1(b) requires the application to state the name, title, address, telephone number, facsimile transmission number, and e-mail address of the person to whom correspondence or communications in regard to the application are to be addressed.

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D. Proposed Categorization, Need for Hearings, Issues to Be Considered, Proposed Schedule – Rule 2.1(c)

Rule 2.1(c) requires that all applications state “the proposed category for the proceeding, the need for hearing, the issues to be considered, and a proposed schedule.”⁵ SCE proposes this application be designated a “quasi-legislative” proceeding, as defined in California Public Utilities Code §1701.1(c)(1) and Rule 1.3(d).⁶ At this time, SCE does not believe hearings will be necessary. SCE recommends that workshops be used to explore the issues raised by this application. This procedure would be consistent with the technical nature of the issues presented and the procedure followed in the proceeding that led to D.14-12-025. After consultation with Pacific Gas and Electric Company (PG&E) and the Sempra Utilities, SCE proposes a series of workshops where the following topics will be discussed in this order:

- Risk Lexicon;
- Presentations of Utilities’ Risk Models;
- Benchmarking Utility Processes and Possible Areas for Common Standards;
- Addressing Limited Data and the Need for Qualitative Solutions to Quantifying Risk Mitigation;
- Time Reserved for Remaining Issues.

⁵ TITLE 20 CAL. CODE REGS. Div. 1, Art. 2, §2.1.

⁶ “Quasi-legislative cases, for purposes of this article, are cases that establish policy, including, but not limited to, rulemakings and investigations which may establish rules affecting an entire industry.” CAL. PUB. UTIL. CODE §1701.1(c)(1). ““Quasi-legislative’ proceedings are proceedings that establish policy or rules (including generic ratemaking policy or rules) affecting a class of regulated entities, including those proceedings in which the Commission investigates rates or practices for an entire regulated industry or class of entities within the industry.” TITLE 20 CAL. CODE REGS §1.3(d).

SCE, PG&E, and the Sempra Utilities have also consulted on a proposed procedural schedule, shown below. The timing of the proposed and final decision may be earlier if evidentiary hearings are not held.

	Event	Day	Date
1.	Application Filed	1	Friday, May 1, 2015
2.	Protests Due	32	Monday, June 1, 2015
3.	Reply to Protests	39	Monday, June 8, 2015
4.	Prehearing Conference	61	By Tuesday, June 30, 2015
5.	Scoping Memo	71	By Friday, July 10, 2015
6.	Workshops	90-92	Wednesday, July 29 – Friday, July 31, 2015
7.	Workshops (if necessary)	TBD	August 2015
8.	Workshop Report Due	116	August 24, 2015
9.	Opening Comments on Workshop Report	137	September 14, 2015
10.	Reply Comments on Workshop Report	151	September 28, 2015
If Evidentiary Hearings Are Held			
11.	Intervenor Testimony	151	By Monday, September 28, 2015
12.	Rebuttal Testimony	181	By Wednesday, October 28, 2015
13.	Evidentiary Hearings	N/A	N/A
14.	Opening Briefs	229	Tuesday, December 15, 2015
15.	Reply Briefs	260	Friday, January 15, 2016
16.	Proposed Decision	304	Tuesday, March 1, 2016
17.	Decision		April 2016

E. Organization and Qualification to Transact Business – Rule 2.2

In compliance with Rule 2.2, a copy of SCE’s Certificate of Restated Articles of Incorporation, effective on March 2, 2006, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 14, 2006, in connection with Application No. 06-03-020, and is by reference made a part hereof.

A copy of SCE’s Certificate of Determination of Preferences of the Series D Preference Stock filed with the California Secretary of State on March 7, 2011, and presently in effect, certified by the California Secretary of State, was filed with the Commission on April 1, 2011, in connection with Application No. 11-04-001, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series E Preference Stock filed with the California Secretary of State on January 12, 2012, and a copy of SCE's Certificate of Increase of Authorized Shares of the Series E Preference Stock filed with the California Secretary of State on January 31, 2012, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 5, 2012, in connection with Application No. 12-03-004, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series F Preference Stock filed with the California Secretary of State on May 5, 2012, and presently in effect, certified by the California Secretary of State, was filed with the Commission on June 29, 2012, in connection with Application No. 12-06-017, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series G Preference Stock filed with the California Secretary of State on January 24, 2013, and presently in effect, certified by the California Secretary of State, was filed with the Commission on January 31, 2013, in connection with Application No. 13-01-016, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series H Preference Stock filed with the California Secretary of State on February 28, 2014, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 24, 2014, in connection with Application No. 14-03-013, and is by reference made a part hereof.

Certain classes and series of SCE's capital stock are listed on a "national securities exchange" as defined in the Securities Exchange Act of 1934 and copies of SCE's latest Annual Report to Shareholders and its latest proxy statement sent to its stockholders has been filed with the Commission with a letter of transmittal dated March 13, 2015, pursuant to General Order Nos. 65-A and 104-A of the Commission.

F. Service

Pending the establishment of a new service list for this new proceeding, a copy of this Application, including exhibits, is being mailed as of this date to the service list for R.13-11-006, and the Office of Ratepayer Advocates.

III.
CONCLUSION

SCE respectfully requests that the Commission open a 2015 SMAP proceeding in accordance with D.14-12-025, and take any other actions reasonable and necessary to bring the 2015 SMAP to its conclusion.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

ROBERT F. LeMOINE
ALLAN D. JOHNSON

/s/ Robert F. LeMoine

By: Robert F. LeMoine

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DATE: May 1, 2015

VERIFICATION

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 1, 2015 at Rosemead, California.

/s/ Ronald Nichols

Ronald Nichols, Senior Vice President, Regulatory Affairs