



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

**FILED**

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Application of Southern California Edison )  
Company (U 338-E) for a Commission Finding )  
that its Procurement-Related and Other )  
Operations for the Record Period January 1 )  
Through December 31, 2014 Complied with its )  
Adopted Procurement Plan; for Verification of its )  
Entries in the Energy Resource Recovery )  
Account and Other Regulatory Accounts; for )  
Recovery of \$3.982 million Recorded in Four )  
Memorandum Accounts; and Review of Proposal )  
to Return \$103.500 million in Unspent Demand )  
Response Funds to Customers. )

Application No. 15-04-002  
(Filed April 1, 2015)

**AMENDED MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)**  
**TO OFFER PREPARED TESTIMONY INTO EVIDENCE**

FADIA R. KHOURY  
RUSSELL A. ARCHER

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-2865  
Facsimile: (626) 302-6962  
E-mail: [Russell.Archer@sce.com](mailto:Russell.Archer@sce.com)

Dated: **June 1, 2016**

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

Application of Southern California Edison	)	
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**AMENDED MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)  
TO OFFER PREPARED TESTIMONY INTO EVIDENCE**

Pursuant to Rule 13.8(c) of the Commission’s Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully files this Motion to Offer Prepared Testimony into Evidence. This Amended Motion updates SCE’s May 27, 2016, original Motion to Offer Prepared Testimony into Evidence by including new Exhibit SCE-08, titled “Supplemental Errata to Direct Testimony of Southern California Edison Company.” SCE has filed a Motion to Seal a Portion of the Evidentiary Record under Rule 11.5(b). SCE’s Motion to Seal requests that the confidential versions of SCE’s testimony be filed under seal in this proceeding.

SCE hereby moves the Commission to receive the following prepared testimony into evidence in this proceeding.

1. The confidential and public versions of Exhibit SCE-01, titled Energy Resource Recovery Account (ERRA) Review of Operations, 2014 Chapters I-VII. SCE will move that the

shaded portions of the confidential version of Exhibit SCE-01 be sealed, as more fully described in SCE's Motion to Seal.

2. The confidential and public versions of Exhibit SCE-02, titled Energy Resource Recovery Account (ERRA) Review of Operations, 2014 Chapters VIII-XVI. SCE will move that the shaded portions of the confidential version of Exhibit SCE-02 be sealed, as more fully described in SCE's Motion to Seal.

3. Exhibit SCE-03, titled Energy Resource Recovery Account (ERRA) Review of Operations, 2014 Witness Qualifications and Declarations re: Confidentiality.

4. The confidential and public versions of Exhibit SCE-04, titled Energy Resource Recovery Account (ERRA) Review of Operations, 2014 SCE-1 and SCE-2 Appendices. SCE will move that the shaded portions of the confidential version of Exhibit SCE-04 be sealed, as more fully described in SCE's Motion to Seal.

5. The confidential and public versions of Exhibit SCE-05, titled Errata to Direct Testimony of Southern California Edison Company. SCE will move that the shaded portions of the confidential version of Exhibit SCE-05 be sealed, as more fully described in SCE's Motion to Seal.

6. The confidential and public versions of Exhibit SCE-06, titled Supplemental Direct Testimony of Southern California Edison Company. SCE will move that the shaded portions of the confidential version of Exhibit SCE-06 be sealed, as more fully described in SCE's Motion to Seal.

7. The confidential and public versions of Exhibit SCE-07, titled Rebuttal Testimony of Southern California Edison Company (U 338-E). SCE will move that the shaded portions of the confidential version of Exhibit SCE-07 be sealed, as more fully described in SCE's Motion to Seal.

8. The public version of Exhibit SCE-08, titled Supplemental Errata to Direct Testimony of Southern California Edison Company. Exhibit SCE-08 and a supplemental witness declaration supporting it are attached hereto as Appendix A.

The exhibits described above have been served concurrently with or prior to the filing of this motion on the presiding Administrative Law Judge(s), the Office of Ratepayer Advocates' representatives in this proceeding, and in the cases of the non-confidential exhibits, upon the service list. The exhibits have been verified by the signed declarations of the sponsoring witnesses, which were either included in Exhibit SCE-03 or Exhibit SCE-05, or were attached to SCE's May 27, 2016, original Motion to Offer Prepared Into Evidence as Appendix A thereto.

Respectfully submitted,

FADIA R. KHOURY  
RUSSELL A. ARCHER

*/s/ Russell A. Archer*

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By: Russell A. Archer

Attorney for  
SOUTHERN CALIFORNIA EDISON COMPANY

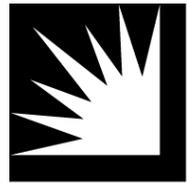
2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-2865  
Facsimile: (626) 302-6962  
E-mail: Russell.Archer@sce.com

Dated: June 1, 2016

**Appendix A**

**SUPPLEMENTAL ERRATA TO DIRECT TESTIMONY**

Application No.: A.15-04-002  
Exhibit No.: SCE-08  
Witnesses: S. Lelewer



SOUTHERN CALIFORNIA  
**EDISON**<sup>®</sup>

An *EDISON INTERNATIONAL*<sup>®</sup> Company

(U 338-E)

***Supplemental Errata to Direct Testimony of Southern  
California Edison Company***

Before the

**Public Utilities Commission of the State of California**

Rosemead, California  
June 1, 2016

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**I.**

**INTRODUCTION**

This purpose of this exhibit, preliminarily marked as Exhibit SCE-08, is to correct errors and make revisions to some portions of the direct testimony of Southern California Edison Company in support of this application, which was served on April 1, 2015.

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**II.**

**ERRATA**

See attached pages for changes.

1 began its 18th refueling, returning to service May 3, 2015, and operating thereafter in Cycle 19 through  
2 the end of the Record Period. Palo Verde Unit 3 was in Cycle 18 through the entire Record Period.

3 The generation-related fuel expense related to SCE's 15.8% ownership interest in Palo Verde  
4 was \$42.3 million. This included \$1.8 million for the permanent disposal of used nuclear fuel paid to  
5 the DOE as mandated by the 1982 Act. The 1982 Act set a one mil/KWh fee, adjusted for system  
6 transmission losses, to be collected from utilities. On May 9, 2014, DOE notified APS that as of May  
7 15, 2014, the Spent Nuclear Fuel Disposal Fee would be 0.0 mil per kilowatt hour (0 M/kWh) of  
8 electricity generated and sold. The 0.0 M/kWh DOE fees were included for remaining months of the  
9 Record Period.

### 10 **3. Non-Generation-Related Expenses**

11 During a reactor refueling, depleted fuel assemblies are removed from a reactor core and  
12 replaced with new fuel assemblies. Since the depleted assemblies are highly radioactive, they must be  
13 stored in a manner that isolates them from the environment. The DOE retains the ultimate responsibility  
14 for the permanent disposal of high-level radioactive waste and used nuclear fuel under the authority of  
15 the 1982 Act. Until DOE implements a program for the disposal of used fuel, utilities must provide  
16 interim used fuel storage. After the DOE licenses and constructs facilities for the storage and permanent  
17 disposal of used fuel, the used fuel being stored on an interim basis will be transferred to the DOE for  
18 disposition. Interim storage is being provided for Palo Verde Units 1, 2 and 3 in their respective used  
19 fuel pools and at the Palo Verde ISFSI located on-site.

20 SCE's share of non-generation-related expenses during the Record Period for Palo Verde totaled  
21 \$0.9 million for a dry cask storage system to store used fuel assemblies at the Palo Verde ISFSI located  
22 on-site.

### 23 **F. Nuclear Fuel Purchases**

24 Nuclear fuel management consists of a sequence of activities involving the procurement and  
25 scheduling of materials and services required to manufacture nuclear fuel assemblies suitable for use in  
26 a nuclear power plant and the disposal of used fuel assemblies after their discharge from the reactor.  
27 These activities described below encompass: (a) mining and milling of natural uranium concentrates

1 the last fuel assembly is delivered to the plant site, or up to five months earlier, depending on contract  
2 provisions.

3 Nuclear fuel must be designed to meet the operating requirements of each operating cycle. The  
4 fuel fabricator or the utility is responsible for the reactor core design of new fuel batches to be loaded  
5 into the reactor core at the start of each operating cycle. APS provides the reactor core design for Palo  
6 Verde. Reactor core design establishes the number of fuel assemblies for the new batches, the amount  
7 of U<sub>3</sub>O<sub>8</sub>, conversion and enrichment required, and the configuration of the reactor core with both the old  
8 and new fuel batches. Fuel fabrication services for Palo Verde are available in the United States from  
9 Westinghouse and Areva.

10 **G. Palo Verde Nuclear Fuel Purchases**

11 **1. Uranium Purchases**

12 During the Record Period, SCE purchased 237,200 pounds of U<sub>3</sub>O<sub>8</sub> for SCE's share of Palo  
13 Verde requirements under contracts with ERA and Itochu dated September 20, 2007 and February 8,  
14 2007, respectively. These contracts were awarded after competitive bidding with deliveries beginning in  
15 2009. In addition, due to favorable market conditions, "one-time" purchases were made through  
16 broker/traders.

17 **2. Conversion to and/or Purchase of UF<sub>6</sub>**

18 During the Record Period, SCE purchased 49,597 KgU of conversion services for SCE's share of  
19 Palo Verde requirements under contracts with ConverDyn and Cameco dated December 7, 2007 and  
20 December 21, 2010 respectively. SCE also purchased 102,352 KgU as UF<sub>6</sub> (U<sub>3</sub>O<sub>8</sub> and conversion  
21 services together) for SCE's share of Palo Verde requirements under a contract with Cameco dated  
22 August 18, 2008 and Areva dated August 20, 2010. These contracts were awarded after competitive  
23 bidding with deliveries beginning in 2009.

24 **3. Enrichment and EUP**

25 During the Record Period, SCE purchased 80,905 SWU for SCE's share of Palo Verde under an  
26 enrichment uranium supply contract with Urenco and LES dated March 24, 2010 and April 17, 2007,

**Appendix A**

**Declaration of Steven A. Lelewer in Support of Prepared Testimony**

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

Application of Southern California Edison Company (U 338-E) for a Commission Finding that its Procurement-Related and Other Operations for the Record Period January 1 Through December 31, 2014 Complied with its Adopted Procurement Plan; for Verification of its Entries in the Energy Resource Recovery Account and Other Regulatory Accounts for Recovery of \$3.982 million Recorded in Four Memorandum Accounts; and Review of Proposal to Return \$103.500 million in Unspent Demand Response Funds to Customers.

Application No. A.15-04-002  
(Filed April 1, 2015)

**DECLARATION OF STEVEN A. LELEWER IN SUPPORT OF PREPARED TESTIMONY**

I, Steven A. Lelewer do hereby declare and affirm that I sponsor the portions of Exhibit SCE-01, titled “Energy Resource Recovery Account (ERRA) Review of Operations, 2014 Chapters I-VII”; as indicated in the table of contents of said exhibit. I have reviewed the testimony, am familiar with it, and affirm that the facts stated therein are true and correct to the best of my knowledge and belief, and that insofar as said material is in the nature of opinion or judgment, it represents my best judgment. Except for the following corrections: 1) Typo on Line 1 of page 102 (May 3, 2015 should be May 3, 2014); 2) Sentence on Line 15 of page 106 (In addition, due to favorable market conditions, “one-time” purchases were made through broker/traders) should be moved to the end of Line 23; and 3) 237,200 pounds on Line 12 of page 106 should be changed to 94,800 pounds and 102,352 KgU on Line 20 of page 106 should be changed to 70,752 KgU.

Sworn to under penalty of perjury this 31th day of May, 2016, at Rosemead, California.

/s/ Steven A Lelewer  
Steven A. Lelewer