



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

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Order Instituting Investigation on the Commission's Own Motion Into the Operations and Practices of Southern California Edison Company; Notice of Opportunity For Hearing; and Order to Show Cause Why the Commission Should Not Impose Fines and Sanctions for Major Power Outages In the City of Long Beach on July 15, 2015 to July 20, 2015, and on July 30 to August 3, 2015.

Investigation 16-07-007  
(Filed July 14, 2016)

**REPLY OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE  
SAFETY AND ENFORCEMENT DIVISION'S RESPONSE TO ADMINISTRATIVE  
LAW JUDGE RULING**

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Dated: **September 13, 2016**

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Southern California Edison Company (SCE) hereby replies to the Safety and Enforcement Division's Response to Administrative Law Judge Ruling dated September 12, 2016 and corrected on September 13, 2016 (SED Response). SED's Response raises important fairness issues, but before SCE can fully respond, SED should provide more information in a formal motion.

For example, how many of the proposed "advisors" were involved in SED's pre-OII investigation and report preparation? On how many other occasions has SED employed an "ethical wall" in a CPUC adjudicatory proceeding? Has such a structure been disclosed and agreed to by the respondent utility and the ALJ? Does SED propose to make any record of the advisory communications that it will provide to other parties? At what stage(s) of the case will the advisory services be performed? SCE notes that both the SED Director and Assistant Director are to be advisors. Should settlement discussions occur between SCE and SED, will

SED's advocacy staff have authority to reach a settlement agreement without the approval of either the Director or Assistant Director?

Given the importance of this issue and the number of questions it presents, SCE respectfully requests that the ALJ issue a preliminary order requiring all SED staff to continue to observe the Commission's ex parte rules in this proceeding and establish a full briefing schedule such as the following:

Sept. 21, 2016 – SED files its motion in support of an ethical wall between advocacy and advisory groups

Sept. 28, 2016 – SCE files its response

Resolution of this issue should have no effect on the schedule adopted by the ALJ.

Respectfully submitted,

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