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

Application Of Southern California Edison
Company (U 338-E) For Authority To Increase
Its Authorized Revenues For Electric Service In
2018, Among Other Things, And To Reflect That
Increase In Rates.

Application No. 16-09-001
(Filed September 1, 2016)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
PREHEARING CONFERENCE STATEMENT**

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I.

INTRODUCTION

Pursuant to Rule 7.2 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure (“Rules”), Applicant Southern California Edison Company (“SCE”) respectfully submits its Prehearing Conference Statement in connection with SCE’s 2018 General Rate Case (“GRC”) Application No. 16-09-001. This Statement addresses the following issues:

- A. Proposed Procedural Schedule
- B. Advance Meet and Confer for Prehearing Conference
- C. Appropriate Categorization of This Proceeding
- D. Avoiding Duplication of Discovery
- E. Evidentiary Hearings
- F. Protection of Confidential Materials
- G. Public Participation Hearings
- H. Process for Correcting Errors in Testimony and Workpapers

II.
DISCUSSION

A. Proposed Procedural Schedule

In working toward a procedural schedule, SCE has three critical goals:

- The schedule should allow for a timely final decision prior to the start of Test Year 2018;
- The schedule should give SCE at least five weeks to prepare its rebuttal testimony; and
- The schedule should provide a reasonable time between the close of the hearings and the date that the proposed decision is issued.

In compliance with Commission Rule 2.1, SCE included a proposed schedule with its Application. As stated in the Application, SCE's proposed schedule accommodated a request from the Office of Ratepayer Advocates (ORA) to have ORA's testimony due on April 7, 2017 rather than the February 20, 2017 date called for under the current Rate Case Plan.¹ ORA supports SCE's proposed procedural schedule.² TURN has indicated it supports the proposed schedule's deadline for ORA's testimony, but suggested that the dates that follow may need "minor tweaking."³ The other parties that filed protests or responses to SCE's Application did not suggest specific changes to SCE's proposed schedule in their respective protests or responses.

SCE anticipates that the procedural schedule will be discussed by the parties at the meet and confer that SCE has noticed, and will be addressed at the prehearing conference.

B. Advance Meet and Confer for Prehearing Conference

As directed by Administrative Law Judges (ALJs) Roscow and Wildgrube in their October 3, 2016 ruling, SCE has noticed a meet and confer for October 20, 2016. At the meet and confer, SCE and other parties will try to resolve any conflicts regarding schedule, scope, and other matters listed in the October 3, 2016 ruling (such as the need for evidentiary hearings, appropriate categorization for the

¹ SCE Application, p. 14.

² ORA Protest, p. 5.

³ See TURN Protest, p. 13.

proceeding, discovery issues, and any additional items the parties wish to address at the prehearing conference).

C. Appropriate Categorization of This Proceeding

SCE respectfully proposes that this GRC be designated a “ratesetting” proceeding, as defined in California Public Utilities Code section 1701.1(c)(3) and Commission Rule 1.3(e).⁴ We proposed this in our Application as required by Rule 6. Other parties largely concurred.

D. Avoiding Duplication of Discovery

As far back as SCE’s Test Year 2009 GRC, the assigned Commissioner provided guidance that ORA and intervenors should coordinate their efforts and minimize duplication. The Assigned Commissioner’s Scoping Memo stated that:

I am asking parties to build upon their prior efforts in similar cases to increase their level of coordination and cooperation. To the fullest extent possible, I urge parties to jointly plan their analysis with the goal to avoid repetition, present joint analysis of issues, and consider joint presentations of witnesses and unified cross-examination.⁵

SCE respectfully submits that ORA and intervenors can and should coordinate their efforts to minimize duplication and maximize efficient processing of this GRC. ORA and the intervenors should receive guidance from the Commission and the ALJs in coordinating their discovery and analysis. Coordinating discovery and analysis will allow for more efficient utilization of ORA’s, TURN’s, and other parties’ resources, and minimize duplicative work by these resources.

Toward that end, SCE suggests that the Commission and the ALJs direct ORA and intervenors to meet and confer on coordinating their discovery and analysis. The parties should also be directed to report to the Commission and the ALJs on the results of their efforts at coordination.

To aid in coordinating discovery, all of SCE’s data request responses are available on an extranet site. That site houses SCE’s responses to the Master Data Request, and all data requests and responses.⁶

⁴ “Ratesetting cases, for purposes of this article, are cases in which rates are established for a specific company, including, but not limited to, general rate cases, performance-based ratemaking, and other ratesetting mechanisms.” CAL. PUB. UTIL. CODE §1701.1(c)(3). “Ratesetting’ proceedings are proceedings in which the Commission sets or investigates rates for a specifically named utility (or utilities), or establishes a mechanism that in turn sets the rates for a specifically named utility (or utilities).” TITLE 20 CAL. CODE REGS §1.3(e).

⁵ A.07-11-011, Scoping Memo and Ruling of Assigned Commissioner, p. 5.

⁶ Material that has been designated as confidential is not freely available on the extranet site.

This site is updated daily. To help parties navigate through the material, the site offers search capabilities. To request access to the extranet site, parties can please send an email to scegrc@sce.com.

Also, SCE's Application, prepared testimony, workpapers, and pleadings or other filings are readily accessible online. Please follow these simple steps:

1. Log onto www.sce.com/applications
2. Scroll down and select "2018 GRC"

Here, parties can find SCE's Application and all of its prepared testimony, workpapers, and pleadings or other filings.⁷ The site will be updated throughout the proceeding.

E. Evidentiary Hearings

Based on the protests and responses SCE received to its Application, SCE expects that evidentiary hearings will occur in this proceeding. However, as SCE stated in its Reply to Protests and Responses, SCE remains open to exploring alternatives to litigation as a means of resolving any issues raised by our Application. For example, SCE and the Center of Accessible Technology have jointly developed testimony that supports SCE's continuing efforts to improve the accessibility of its operations. The joint testimony is found in Exhibit SCE-11.⁸

Ultimately, the length of evidentiary hearings will be driven by the scope of the prepared testimony that ORA and intervenors submit, and the extent and efficiency of cross-examination. SCE's 2015 GRC evidentiary hearings were completed in 14 hearing days. SCE's 2012 GRC evidentiary hearings took 17 hearing days. Based on past experience, SCE estimates that the hearings in this case can be completed in 15 hearing days.

Given the importance of a final decision before year-end 2017, SCE recommends that the Commission follow prior practice and apportion the available cross-examination time among all the parties to accommodate the appearance of all parties' witnesses. SCE also suggests that the Commission place all parties on notice of the potential necessity to limit and allocate cross-examination, redirect, and recross-examination time.

⁷ Confidential materials are not placed on the website.

⁸ SCE and the Center for Accessible Technology also resolved their issues and submitted joint testimony in SCE's 2015 GRC.

To assist the other parties and the Commission in planning for the hearings, SCE plans to again use a spreadsheet tool to help organize the order and cross-examination estimates for witnesses. This spreadsheet has been used in SCE's last several rate cases. The spreadsheet includes fields for parties to designate their cross-examination estimates for each witness, and calculates the equivalent number of hearing days. SCE offers to keep this tool updated throughout the proceeding. SCE will circulate the spreadsheet well before the hearings, or at whatever juncture the Commission prefers.

At this time, SCE does not anticipate requesting the presence of President Picker, the Assigned Commissioner, for the presentation of testimony, although SCE certainly welcomes his presence for as much of the hearings as his schedule may permit.

SCE's Application requested that a portion of the hearings be held in southern California. SCE's Reply to Protests and Responses explained why doing so appears to be consistent with California legislative intent that the Commission try to increase its presence and business activities in communities outside of San Francisco.⁹ The Commission has noticed Regionalization Workshops to explore, among other things, different scenarios for increasing the Commission's presence in Los Angeles or moving some or most of its operations to Los Angeles and/or Sacramento.¹⁰

F. Protection of Confidential Materials

SCE's 2018 GRC Application is supported by thousands of pages of testimony and workpapers. A small subset of SCE's testimony and workpapers contain confidential information. SCE has provided the confidential documents to Commission Staff (such as ORA) under Section 583 of the Public Utilities Code and General Order 66(c), and has followed the procedures outlined by the Commission in D.16-08-024. SCE plans to execute a non-disclosure agreement with other parties who need access to the confidential documents.

⁹ SCE's Reply to Protests and Responses, p. 7.

¹⁰ *Id.*

G. Public Participation Hearings

SCE anticipates that a ruling will be issued setting forth the schedule for Public Participation Hearings. SCE looks forward to assisting with, and participating in, those hearings consistent with the Commission's directions and at any locations chosen by the Commission.

H. Process for Correcting Errors in Testimony and Workpapers

During the course of the proceeding, SCE (and other parties) may discover inadvertent errors in prepared testimony or workpapers. SCE will provide corrections to prepared testimony and workpapers in the form of errata exhibits. To provide corrections promptly, SCE proposes to submit one round of errata on or about November 17, 2016, and then provide additional errata, if any, shortly after SCE serves its rebuttal testimony (but prior to the evidentiary hearings). To make the most efficient use of hearing time, SCE encourages other parties to also submit their errata exhibits prior to the hearings.

As indicated in SCE's September 1, 2016 Notice of Availability (and as discussed above), SCE's testimony and workpapers are available on SCE's website at www.sce.com/applications. Since filing the Application on September 1, SCE has updated its website to include revised versions of the following: (1) Exhibit SCE-03 (Customer Service),¹¹ and (2) Exhibit SCE-02, Volume 3 (Transmission & Distribution – System Planning) and workpapers.¹² SCE also added workpapers to Exhibit SCE-06, Volume 3 (Human Resources – Total Compensation Study).¹³ SCE provided notice of each of these limited revisions and additions to all parties on the 2015 GRC and 2018 GRC service lists.

III.

CONCLUSION

SCE appreciates the opportunity to submit this Prehearing Conference Statement. We look forward to discussing these matters further at the prehearing conference.

¹¹ Revised on or about September 12, 2016 due to a printing error in the testimony.

¹² Revised on or about September 27, 2016 after discussion with the Office of Ratepayer Advocates to reorganize the workpapers.

¹³ SCE made this addition on September 29, 2016.

Respectfully submitted,

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