

Dockets:	:	<u>A.16-03-004, 15-01-014</u>
	:	<u>& A.15-02-006</u>
Exhibit Number	:	<u>ORA-02 WP</u>
Commissioner	:	<u>Guzman-Aceves</u>
Admin. Law Judge	:	<u>Houck</u>
Witness	:	<u>Y. Lasko</u>



OFFICE OF RATEPAYER ADVOCATES
CALIFORNIA PUBLIC UTILITIES COMMISSION

Report on the
2015 Nuclear Decommissioning Cost
Triennial Proceeding for
Southern California Edison Company and
San Diego Gas & Electric Company

Phase 2 Workpapers

San Francisco, California
November 2017

Southern California Edison
NDCTP 2015 A.16-03-004 A.16-03-004

DATA REQUEST SET A.16-03-004 ORA-SCE+SDGE-YNL-002

To: ORA
Prepared by: Linda Anabtawi
Title: Attorney
Dated: 09/19/2017

Question 02:

Referring to Exhibit SCE-04, page 15, lines 2-4 and SCE's response to TURN's data request set A.16-03-004 TURN-SCE-011, please provide the following:

2. Assuming that SCE will reach an agreement with CA State Lands Commission prior to September 23, 2018 and the offshore conduits will remain in place, which of the following costs, among others, will be avoidable in part and in full: "cost for a survey and environmental assessment, engineering planning and design, permits and approvals, and the actual removal of the conduits?" For those costs that will remain avoidable in part, please provide an estimate of partially avoidable costs (savings).

Response to Question 02:

It is unknown at this time whether the CA State Lands Commission will approve permanent abandonment of the conduits in place without a future obligation to potentially remove the conduits. If SCE retains any future liability, all of the listed costs will be applicable.

Southern California Edison
NDCTP 2015 A.16-03-004 A.16-03-004

DATA REQUEST SET A.16-03-004 ORA-SCE+SDGE-YNL-002

To: ORA
Prepared by: Linda Anabtawi
Title: Attorney
Dated: 09/19/2017

Question 04:

Referring to Exhibit SCE-04, page 15, lines 2-4 and SCE's response to TURN's data request set A.16-03-004 TURN-SCE-011, please provide the following:

4. Will SCE have to reach a final Lease Termination Agreement prior to the expiration of the current lease on September 23, 2018? If not, when does SCE expect to reach the final agreement? Please provide any updates regarding SCE's negotiations with CSLC regarding the final Lease Termination Agreement to date.

Response to Question 04:

Prior to expiration of the current lease on September 23, 2018, SCE will have to either reach a final Lease Termination Agreement or seek an extension of the current lease. At this time, the CSLC is reviewing SCE's request to eliminate future liability for potential removal of the remaining conduit structures.

Southern California Edison
NDCTP 2015 A.16-03-004 A.16-03-004

DATA REQUEST SET A.16-03-004 TURN-SCE-011

To: TURN

Prepared by: Robert Bledsoe

Title: Senior Project Manager, CPUC Regulatory Affairs and Compliance

Dated: 09/01/2017

Question 04:

4. Regarding the conduit removal discussed in request 4 above, please summarize how SCE has treated this liability in DCEs, beginning with the DCE prior to the 2005 agreement with the State of California and through the 2012 DCE. Include whether an estimate for conduit removal was included or not, the scope of the cost, i.e. conduits and risers or just risers, and the amount of any estimate. Please include copies of the pages from the DCEs that show the scope and amounts.

Response to Question 04:

The 2002 SONGS 1 DCE included the cost to remove the SONGS 1 offshore conduits, as stated on page 27 of the DCE. This cost was included as a portion of the estimated "Intake" decommissioning cost on page 14 of the DCE. The 2005, 2009, and 2012 SONGS 1 DCEs were developed after the 2005 agreement with the State of California that allowed the partial removal and abandonment of these conduits. These DCEs, therefore, only included the estimated cost of the partial removal. The 2005 agreement also required SCE to enter into a Lease Termination Agreement that would detail SCE's obligations and responsibilities for any abandoned facilities, including but not limited to SCE's commitment to respond to any claims arising from the abandoned facilities; removal of any remaining facilities to the extent that they become a public safety hazard at any time in the future; and SCE's obligation to provide sufficient financial assurance to guarantee faithful performance of the Lease Termination Agreement. SCE included the estimated cost to remove the abandoned facilities in the 2016 SONGS 1 DCE.

The relevant pages from the 2002, 2005, 2009, and 2012 SONGS 1 DCEs are attached.

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end