

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA



FILED

08-10-09
04:59 PM

Order Instituting Rulemaking to Consider Smart
Grid Technologies Pursuant to Federal
Legislation and on the Commission's Own
Motion to Actively Guide Policy in California's
Development of a Smart Grid System

R.08-12-009
(Filed December 18, 2008)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS TO THE
PROPOSED DECISION OF COMMISSIONER CHONG ESTABLISHING
COMMISSION PROCESSES FOR REVIEW OF PROJECTS AND INVESTMENTS BY
INVESTOR-OWNED UTILITIES SEEKING RECOVERY ACT FUNDING

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Dated: **August 10, 2009**

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STATE OF CALIFORNIA**

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Pursuant to Rule 14.3 of the California Public Utilities Commission Rules of Practice and Procedure, **Southern California Edison Company (SCE)** respectfully submits the following brief comments to the Proposed Decision of Commissioner Chong Establishing Commission Processes For Review of Projects and Investments By Investor-Owned Utilities Seeking Recovery Act Funding (PD).

SCE acknowledges and appreciates Commissioner Chong's efforts to provide guidance and appropriate support to parties that are seeking matching Federal funds under the American Recovery and Reinvestment Act of 2009. SCE believes that the close alignment of state and federal policies concerning the Smart Grid makes it reasonable for this Commission to provide expedited procedures for assessing investments and projects that seek to bring Federal stimulus dollars into California. Critical procedures identified in the PD include:

- Establishment of a memorandum account to track costs;

- A rebuttable presumption of reasonableness to the maximum extent the Commission believes to be reasonable; and
- An advice letter or expedited application process for reviewing projects.

Respectfully submitted,

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/s/ Kris G. Vyas

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August 10, 2009

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS TO THE PROPOSED DECISION OF COMMISSIONER CHONG ESTABLISHING COMMISSION PROCESSES FOR REVIEW OF PROJECTS AND INVESTMENTS BY INVESTOR-OWNED UTILITIES SEEKING RECOVERY ACT FUNDING on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address.
First class mail will be used if electronic service cannot be effectuated.

Executed this **10th day of August, 2009**, at Rosemead, California.

/s/ Veronica Flores
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