

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

05-25-11
04:59 PM

Application of Southern California Edison Company (U 338-E) to Recover O&M Costs Associated with the San Onofre Nuclear Generating Station Units Nos. 2 and 3 On-going Seismic Program, and New Seismic Research Projects and Analyses.

Application 11-04-006
(Filed April 15, 2011)

**MOTION
OF THE ALLIANCE FOR NUCLEAR RESPONSIBILITY
TO BECOME A PARTY**

Pursuant to Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the Alliance for Nuclear Responsibility (A4NR) files this motion to become a party to the above captioned proceeding. On April 15, 2011, Southern California Edison (SCE) filed the above-referenced application requesting that the Commission approve their request to recover O&M Costs associated with the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3 on-going seismic program, and new seismic research projects and analyses. SCE's Application was followed by an Application by San Diego Gas and Electric (SDG&E) on May 11, 2011. While A4NR was on the service lists for both filings, we had not received CPUC notification of acceptance of the Applications, nor a calendar for this combined Application.

Section 1.4(a)(4) of the Rules grants parties the authority to become a party to a proceeding by filing a motion to become a party. Under Rule 1.4(b), a person seeking party status by filing a motion to become a party must:

- (1) fully disclose the persons or entities in whose behalf the filing, appearance or motion is made, and the interest of such person or entities in the proceeding; and

- (2) state the factual and legal contentions that the person intends to make and show that the contentions will be reasonably pertinent to the issues already present.

Regarding 1.4(b)(1), the entity seeking filing status is A4NR and the specific project representative for this proceeding will be:

Ms. Rochelle Becker, Executive Directors
Alliance for Nuclear Responsibility
PO 1328
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The Appearance will be made on behalf of A4NR by the undersigned, Rochelle Becker, whose information can be found below at the signature line.

A4NR's mission is to address license renewal issues at both Diablo Canyon and SONGS. We represent ratepayers within SCE and SDG&E service districts advocate on behalf of public utility customers to obtain the lowest possible rates consistent with reliable and safe service levels. A4NR seeks to protect the interests of ratepayers and therefore has an interest in this proceeding.

A4NR requested that both seismic funding and any funding for an eventual license renewal for SONGS be removed from A. 10-11-015. On page 15 of Assigned Commissioner Simon's March 1, 2011 ruling he stated:

5. Funding for seismic studies and nuclear license renewal: The primary issue identified by A4NR is its request for removal from the GRC of all funding for seismic studies recommended by the California Energy Commission as a result of AB1632, and funding related to renewal of SCE's nuclear license. A4NR argued that these issues should be submitted to the Commission in separate proceedings similar to PG&E's applications in A.10-01-014 (seismic) and A.10-01-022 (license renewal). I agree with A4NR that these issues should be addressed through separate applications

so that the Commission may act more quickly and uniformly on these issues.

As A4NR prevailed in our request to remove seismic and license renewal issues from SCE's GRC and we had received both SCE and SDG&E's filings, we assumed we were already a party in the instant proceeding and would receive scoping memo and calendar. This does not appear to be the case.

A4NR participated in PG&E's seismic application and continues to be an opponent of PG&E's license renewal funding application. While we do not oppose the request for SCE and SDG&E seismic funding, we do have questions, will prepare cross-examination, and wish to monitor and participate if our questions cannot be resolved.

Regarding 1.4(b)(2), A4NR is currently reviewing SCE and SDG&E testimony both in light of funding requests and also in light of lessons learned from Fukushima. As the NRC will not announce its first set of lessons learned until June 15, 2011, we would appreciate the Assigned Commissioner and ALJ's indulgence in a slower review than is ordinarily set in funding procedures. Again, in light of the still-ongoing nuclear disaster in Japan we do not believe it is the best interest of the public to rush funding for studies, the parameters of which are likely to be a moving target. On the other hand, SCE was directed to undergo new seismic studies in 2008 and could have filed long before February 2011 for seismic funding.

A4NR will seek to ensure that inclusion of our participation does not delay the onset of the state's seismic funding requests in SCE or SDG&E applications. A4NR believes it has the right, and in light our participation in the PG&E's seismic proceeding, the responsibility to monitor this proceeding.

A4NR will seek to ensure that any rate modifications are in the best interest of the ratepayers, consistent with the CPUC's statutory mandate. If there are any other issues, A4NR will certainly raise them at the prehearing conference.

On the basis above, A4NR respectfully requests that the Commission confer party status upon it.

Respectfully submitted,

/s/ Rochelle Becker

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May 25, 2011

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL OR U.S. MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Alliance for Nuclear Responsibility, PO 1328, San Luis Obispo, CA 93406

I am readily familiar with the business practice of the Alliance for Nuclear Responsibility for collection and processing of correspondence for mailing with the United States Postal Service.

In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On May 27, 2011, I caused to be served a true copy of:

Motion of the ALLIANCE FOR NUCLEAR RESPONSIBILITY to become a party

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for 11-04-006 with an e-mail address.

[] By U.S. Mail – by placing it for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to all parties of record on the service list for 11-04-006 who do not have an email address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 27, 2011 at San Luis Obispo, California.

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