



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Application of Southern California Edison
Company (U 338-E) For Authority To, Among
Other Things, Increase Its Authorized Revenues
For Electric Service In 2012, And to Reflect That
Increase In Rates.

A.10-11-015
(Filed November 23, 2010)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO TURN
MOTION FOR MEMORANDUM ACCOUNT**

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Dated: **January 13, 2011**

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO TURN MOTION
FOR MEMORANDUM ACCOUNT**

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I.

INTRODUCTION

Pursuant to Commission Rule of Practice and Procedure 11(e), Southern California Edison Company (“SCE”) submits this response to the Motion to Establish a Memorandum Account (“Motion”) filed by The Utility Reform Network (“TURN”). While SCE has itself in prior General Rate Cases (GRCs) requested the establishment of a memorandum account, we believe doing so now would be premature and may have the counterproductive effect of leading the Commission to conclude that adopting a decision by year-end 2011 is not necessary.

II.

DISCUSSION

A. A Memorandum Account Will Not Completely Insulate SCE and Its Customers From the Effects of an Untimely GRC Decision

As discussed in SCE’s January 10, 2011 Reply to Protests, our paramount scheduling concern is that the Commission issue its final decision in this proceeding by year-end 2011, so

that we can plan and execute the spending, contracting, and employment needed to operate a safe and reliable system. We are amenable to any reasonable schedule that will accomplish that goal.

When faced with schedule slippages in prior GRCs, the Commission has adopted memorandum accounts that track the difference between the currently authorized revenues and those ultimately adopted by the Commission for the Test Year. Although such a memorandum account may keep the utility and ratepayers reasonably whole in terms of revenue requirement impacts, a memorandum account does not fully offset the effects of a schedule delay.

In Decision (D.) 06-05-016, the Commission noted its practice of establishing memorandum accounts so as to permit GRC decisions delayed past the start of the Test Year to be effective as if the decisions had not been delayed. The Commission has indicated that such action “is consistent with our previously stated policy objectives of holding utility shareholders and ratepayers harmless for any required procedural delays.”¹ We fully support this notion and believe this mechanism can be used effectively for short, unanticipated delays. However, while the memorandum account can track dollars, it does not hold the utility harmless from procedural delays, because the utility cannot move forward on important programs and investments until it knows the Commission-authorized revenue levels.

SCE provides a vital service to our customers, and we have the responsibility to provide it in a safe and reliable manner. This implicates our workforce, our many contracts with outside vendors, and ultimately our ability to “keep the lights on.” As discussed in the prepared testimony accompanying our application, our rate case will create and preserve jobs, and positively impact local and regional economies in California. To make such forward progress, SCE needs the certainty of Commission-authorized revenue levels before year-end 2011.

Moreover, as also stated in our application and accompanying testimony, we face serious challenges in many areas, including but not limited to replacing aging infrastructure and maintaining grid reliability, handling continued system maintenance, improving safety for our

¹ D.06-05-016, p. 350.

customers, our employees, and the general public, working toward meeting Commission policy objectives such as the renewables goal for our mix of resources, providing for the security of our electric grid, and minimizing SCE's environmental footprint. The work that needs to be completed to preserve a safe and reliable system requires advance planning and consistent work flows. We need a Commission decision before year-end 2011 in order to budget for and ultimately spend the amounts approved by the Commission in this GRC.²

SCE's business operations require the Company to make commitments and enter into contracts to deploy resources consistent with a specific scope of work. If the GRC delay extends several months, as SCE's 2009 GRC did, then these labor resource commitments and commercial contracts are likewise delayed. SCE's work cannot be toggled "on and off" to conform to regulatory delays.

SCE acknowledges that, during the course of litigating this GRC during 2011, unavoidable delays could occur causing the final decision to slip beyond year-end 2011. In such a case, a memorandum account should be established at the appropriate juncture. But it is important to note that a memorandum account only partially mitigates the problems caused by a delayed decision, and therefore the Commission should not approve a schedule at the outset that will not meet the Commission's own standards for completing a GRC before the beginning of the Test Year.³

² SCE's previous GRC illustrated the economic consequences that flow from a delayed GRC decision. During the interim period while the final decision was delayed, SCE had to restrain budgets. Even after the final decision was issued, SCE still had to adjust the timing of capital spending over the three-year GRC cycle to manage to authorized revenues. (*See* SCE's Response to Protests (filed January 10, 2010), p. 5.)

³ While San Diego Gas & Electric Company ("SDG&E") and Southern California Gas Company ("SoCalGas") have filed a Joint Motion to Establish Memorandum Accounts ("Joint Motion"), their Joint Motion expressly states that "establishment of [a memorandum account] should not create an expectation of a delay in the procedural schedule set forth by the Rate Case Plan. Timely implementation of test year rates is still a critical and reasonable expectation on the part of SDG&E, SoCalGas, and their ratepayers, and was a determining factor in the timing of the Notices of Intent to file their GRCs (August 2010) and subsequent filing of their GRCs (December 2010)." (Joint Motion, p. 2.)

B. The Commission Believes It Can Timely Process Multiple Rate Cases

TURN suggests that establishing a memorandum account now is “consistent with reality” because the Commission is attempting to simultaneously process GRCs covering multiple energy utilities and cannot possibly issue a timely decision. (Motion, pp. 2-3.) The Division of Ratepayer Advocates (“DRA”) and TURN made similar “multiple utility” arguments in the Sempra GRC, and the Commission rejected these arguments, noting that “[t]he Commission and DRA have sufficient resources to process simultaneous test-year” GRCs.⁴ The Commission added that “we can also expect to successfully conduct rate cases for Edison as well as SDG&E and SoCalGas for test year 2012.”⁵ Just one month ago, the Commission reiterated that DRA has failed to show that scheduling three energy utility GRCs for the Test Year 2012 presents unsolvable resource issues:

DRA has not provided information establishing that we have refused or an incapable of providing the necessary personnel and resources to the division to represent and advocate at a level sufficient to ensure that customer . . . interests are fairly represented in all three GRCs. The allegation is without merit.⁶

The Commission appears to be confident it can timely process multiple GRCs, and SCE agrees.

III.

CONCLUSION

For the reasons stated above, SCE respectfully requests that the Commission treat TURN’s Motion in accordance with this Response.

⁴ D.08-07-046, p. 40.

⁵ *Id.*

⁶ D.10-12-018, p. 7 (Ellipses in original, internal quotes omitted).

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January 13, 2011

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) RESPONSE TO TURN MOTION FOR MEMORANDUM ACCOUNT 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 **13th day of January, 2011**, at Rosemead, California.

/s/ Christina Sanchez
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