



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE **FILED**

STATE OF CALIFORNIA

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Order Instituting Rulemaking to Integrate and)
Refine Procurement Policies and Consider Long-)
Term Procurement Plans.)

R.12-03-014
(Filed March 22, 2012)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO THE
ALLIANCE FOR NUCLEAR RESPONSIBILITY'S MOTION SEEKING PERMISSION
TO LATE-FILE NOI FOR INTERVENOR COMPENSATION**

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Dated: **July 6, 2012**

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I.

INTRODUCTION

Pursuant to Rule 11.1(e) of the California Public Utilities Commission's Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully submits this response to the July 2, 2012 Motion Seeking Permission to Late-File for Intervenor Compensation (Motion) filed by Alliance for Nuclear Responsibility (A4NR). A4NR's Motion was filed over a month after service of notice of intent to claim compensations were due.¹ A4NR cannot justify its untimely motion for party status in this proceeding. A4NR and the individuals representing A4NR should be put on notice that subsequent requests for intervenor compensation must be filed in a timely manner.

¹ R.12-03-014, p. 15

II.

A4NR'S MOTION IS UNTIMELY

An intervenor must file notice of intent to claim compensation within 30 days after the prehearing conference is held.² Late filing is only allowed “[i]n cases where the schedule would not reasonably allow parties to identify issues within the [30 day timeframe], or where new issues emerge subsequent to the time set for filing[.]”³

Here, the scoping memo was quite clear on the allocation of LTPP issues to Tracks 1, 2 and 3.⁴ No new issues have emerged that justify late filing. Furthermore, the scoping memo clearly laid out deadlines for potential intervenors for Track 1, directing that “a customer who intends to seek an award of compensation should file and serve a notice of intent to claim compensation no later than May 18, 2012.”⁵ Any discussion at the CEC workshop on Electricity Infrastructure did not extend the relevant deadlines or expand the scope of the proceeding. Therefore, A4NR’s tardiness is not excused. A4NR and the individuals representing A4NR should be put on notice that subsequent requests for intervenor compensation must be filed in a timely manner.

III.

CONCLUSION

For the foregoing reasons, SCE respectfully requests that the Commission direct A4NR to file subsequent requests for party status and intervenor compensation in a timely manner.

² Cal. Public Util. Code, §1804(a)(1)

³ *Id.*

⁴ R.12-03-014, pp. 3-13.

⁵ *Id.*, at p. 15

Respectfully submitted,

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