



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

STATE OF CALIFORNIA

01-26-11

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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)**  
**PREHEARING CONFERENCE STATEMENT**

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**I.**

**INTRODUCTION**

Pursuant to Rule 7.2 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, Applicant Southern California Edison Company ("SCE") respectfully submits its Prehearing Conference Statement in connection with SCE's 2012 General Rate Case ("GRC") Application No. 10-11-015. This Statement addresses the following issues:

- A. Proposed Procedural Schedule
- B. Evidentiary Hearings
- C. Status of Discovery
- D. Electronic Discovery Support
- E. Protection of Confidential Materials
- F. Proposed Testimony Standards
- G. Proposed Briefing Standards
- H. Minimal Overlap in the Division of Ratepayer Advocates' ("DRA's") Staffing on the Concurrent GRCs
- I. Measures to Mitigate Resource Constraints

- J. Supplemental Testimony
- K. Public Participation Hearings
- L. The Prehearing Conference Statement filed by the National Asian American Coalition, et al.

## II.

### DISCUSSION

SCE filed its 2012 Test Year General Rate Case (GRC) Phase I Application and submitted its testimony supporting SCE's 2009-2011 GRC-related revenue requirement on November 23, 2010. This GRC request addresses essential activities necessary for SCE to continue providing safe and reliable service to its customers. SCE faces serious challenges in, among other areas: (1) replacing an aging utility infrastructure and preserving grid reliability; (2) handling continued system maintenance; (3) improving safety for our customers, our employees, and the general public; (4) working toward meeting Commission policy objectives such as the renewables goal for our mix of resources; (5) providing for the security of our electric grid; and (6) retaining a well-trained workforce despite a large number of looming retirements.

Each of these factors affects our costs. SCE recognizes that its 2012 Test Year request is substantial, but it would have been even larger had SCE not taken steps to reduce costs that are within its control. Given the need to address these challenges, SCE requests that the Commission adopt its requested increase and to do so in a timely manner, consistent with the Commission Rate Case Plan.<sup>1</sup>

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<sup>1</sup> D.89-01-040, as amended by D.07-07-004.

**A. Proposed Procedural Schedule**

In compliance with the requirements of Commission Rule 2.1, SCE included a proposed schedule with its Application. The date for DRA’s testimony in SCE’s proposed schedule was taken from the Commission’s Rate Case Plan.<sup>2</sup> In its Protest to SCE’s Application, DRA requested a three-month delay for the deadline for DRA’s testimony. DRA did not, as required by Commission Rule of Practice and Procedure (“Rule”) 2.6(d), include an alternative schedule. In its Response to Protests filed on January 10, 2011, SCE opposed DRA’s request for an extension. SCE will not repeat the many reasons why DRA’s extension should not be granted, and instead refers the Commission to SCE’s Response to Protests.<sup>3</sup>

Two other parties also addressed the procedural schedule. The Utility Reform Network (“TURN”) indicated that it would defer presenting a proposed schedule until its prehearing conference statement. As SCE showed, this is contrary to Rule 2.6(d).<sup>4</sup> In their Joint Motion Requesting Party Status (“Joint Motion”), the National Asian American Coalition, Latino Business Chamber of Greater Los Angeles, and Black Economic Council (collectively, the “Moving Parties”) sought a one-year delay of this entire rate case. In its Response to the Joint Motion, SCE showed that the Moving Parties’ request is irresponsible and unreasonable. SCE refers the Commission to that Response.<sup>5</sup>

SCE is open to *reasonable* modifications to its proposed schedule. However, it is essential that any schedule the Commission eventually adopts ensures a final decision before the start of Test Year 2012.<sup>6</sup> The Commission has obligations not just to DRA and intervenors, but to SCE as well. *See* D.91-07-075, p. 9 (“In reaching decisions, the Commission has the

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<sup>2</sup> D.07-07-004, Appendix p. A-5.

<sup>3</sup> SCE’s Response to Protests, filed January 10, 2011, at pp. 3-8.

<sup>4</sup> *See* SCE’s Response to Protests, p. 9.

<sup>5</sup> SCE’s Response to Joint Motion, filed January 12, 2011, at pp. 2-3, 6-7.

<sup>6</sup> SCE notes that there are two Commission conferences scheduled for December 2011 – one on December 1, 2011 and the other on December 15, 2011. SCE urges the Commission to target the earlier date. It has been SCE’s experience that despite the best intentions and best efforts of all parties, “final” Commission GRC decisions frequently contain technical errors, particularly in the details of the final revenue requirement. The Commission’s procedural schedule needs to provide a reasonable buffer of time for any such errors to be corrected. Thus, it would be impractical to target the December 15, 2011 conference.

obligation to balance the interests of applicants' shareholders and ratepayers under the constraints of the evidence presented in the proceeding and the time constraints permitted for its completion.").

SCE and the Sempra utilities have already presented proposed procedural schedules in their respective applications. The chart on the following page combines the proposed procedural schedules from the utilities' respective applications. By following these proposed schedules, the Commission could process all three applications by year-end 2011.



SCE also acknowledges that in recent GRCs, DRA’s testimony has not been required on Day 77, as provided in the Rate Case Plan. The table below shows the dates adopted in the Scoping Memos for SCE’s 2006 and 2009 GRCs, and the “Day” for those events relative to the application filing date, referred to in the Rate Case Plan as “Day 0.” The table calculates the average “Day” for these events and applies that average to “Day 0” for this 2012 GRC.

**Table II-2**  
**2006 and 2009 GRC Dates Applied to 2012 GRC**

Event	SCE 2006 GRC A.04-12-014		SCE 2009 GRC A.07-11-011		Average Day	Applied to A.10-11-015
	Date	Day	Date	Day		
Application	December 21, 2004	0	November 19, 2007	0	0	November 23, 2010
DRA Testimony	April 15, 2005	115	April 1, 2008	134	125	March 27, 2011
Intervenor Testimony	May 6, 2005	136	April 7, 2008	140	138	April 10, 2011
Rebuttal Testimony	May 25, 2005	155	April 14, 2008	147	151	April 23, 2011
Evidentiary Hearings Begin	June 7, 2005	168	May 5, 2008	168	168	May 10, 2011
Opening Briefs	August 12, 2005	234	June 30, 2008	224	229	July 10, 2011
Reply Briefs	September 2, 2005	255	July 7, 2008	231	243	July 24, 2011

As shown in the table above, based on the Scoping Memos adopted in SCE’s 2006 and 2009 GRCs, DRA’s testimony was due, on average, on Day 125. This translates to March 27, 2011 relative to the date SCE filed its application. Table II-3 below applies the average due dates from SCE’s 2006 and 2009 GRCs to the 2012 GRC for SCE.<sup>7</sup> Because the schedule as found in Table II-3 is based on what was actually *adopted* in the two prior SCE GRCs, it is workable.

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<sup>7</sup> Dates that fell on weekends were adjusted accordingly.



## **B. Evidentiary Hearings**

Based on the protests received in response to its Application, SCE fully expects the Commission to conduct evidentiary hearings in this proceeding. SCE's direct showing includes more than 50 volumes of written testimony, sponsored by approximately 90 witnesses. Ultimately, the length of evidentiary hearings will be driven by the extent to which all parties conduct cross-examination and how efficiently they do so. Based on the most recent utility GRC proceedings,<sup>8</sup> we anticipate approximately 15 days of hearings.<sup>9</sup> Given the importance of a final decision before year-end 2011, SCE recommends that the Commission follow prior practice<sup>10</sup> and apportion the available cross-examination time among all the parties to accommodate the appearance of all witnesses and place all parties on notice of the potential necessity to limit and allocate cross-examination, redirect, and recross-examination time.

To assist the other parties and the Commission in planning for the hearings, SCE has developed a spreadsheet tool to help organize the order and cross-examination estimates for witnesses. A sample of this spreadsheet is attached hereto as Attachment A<sup>11</sup> and is similar to the ones used in SCE's 2006 and 2009 GRCs. It includes fields for parties to designate their cross-examination estimates for each witness, and calculates the equivalent number of hearing days. SCE renews its offer to keep this tool updated throughout the proceeding.

In its Application, SCE requested that at least a portion of the evidentiary hearings be held in southern California, presumably either at the Commission's Los Angeles Office or at

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<sup>8</sup> Based on averaging the number of days of evidentiary hearings for SCE's 2009 GRC (13 days), PG&E's 2009 GRC (20 days), and the Sempra utilities' 2008 GRC (13 days).

<sup>9</sup> If that full amount of time is ultimately not needed, it can be added to the schedule for briefing, and for drafting the ALJ's proposed decision.

<sup>10</sup> *See, e.g.*, Assigned Commissioner's Ruling, issued February 7, 2008 in A.07-11-011, at p. 5; Assigned Commissioner's Ruling and Scoping Memo Establishing Scope, Schedule, and Procedures for Proceeding, issued March 15, 2005 in A.04-12-014, at p. 5.

<sup>11</sup> Please note that this sample template is presented for illustrative purposes and the order of witnesses and the identification of parties that will be participating in hearings are not finalized. SCE expects to work with the other parties to develop an order of witnesses that is most convenient for all parties involved. Moreover, if a portion of hearings are held in southern California, SCE expects that some witnesses could be taken out of sequence to accommodate other parties' schedules.

another suitable location within SCE's service territory, consistent with the approach set forth in the Scoping Memorandum in A.07-11-011.<sup>12</sup> This request is based on the fact that the approximately 90 witnesses that support SCE's Application reside in southern California. It would be much more cost-effective to avoid travel to San Francisco for all of those witnesses, plus SCE's attorneys and support staff, both in terms of direct travel costs and time away from other duties.

At this time, SCE does not anticipate requesting the presence of the Assigned Commissioner for the presentation of testimony, although SCE reserves its right to make such a request pursuant to Rule 13.3 if circumstances so warrant.

**C. Status of Discovery**

**1. Amount of Discovery Propounded to SCE**

SCE has already responded to a significant level of discovery in this proceeding. As of January 17, 2011, SCE has received 2,331 data request questions,<sup>13</sup> in addition to 380 individual requests propounded through the Master Data Request and the 159 interrogatories related to deficiencies to the NOI. Indeed, the level of discovery this early in the proceeding is more extensive than SCE faced in its 2009 GRC at this point. We have received nearly *double* the number of data request questions in comparison to our 2009 GRC. As indicated above, SCE has received 2,331 data request questions, compared to 1,251 at this point in the proceeding in SCE's 2009 GRC.

SCE has also made concerted efforts to respond to DRA inquiries through in-person meetings and teleconferences. To date, SCE has had five meetings with DRA in San Francisco to answer questions and discuss different parts of SCE's showing. SCE has also had

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<sup>12</sup> See Scoping Memo and Ruling of Assigned Commissioner in A.07-11-011, issued February 7, 2008, at p. 9.

<sup>13</sup> This total includes written, verbal, and audit data request questions received to date. This does not include the Master Data Request or deficiency-related interrogatories.

more than 50 teleconferences with DRA to address questions from DRA, and has met with DRA analysts at SCE's San Onofre Nuclear Generating Station ("SONGS").

## **2. Timing of Discovery**

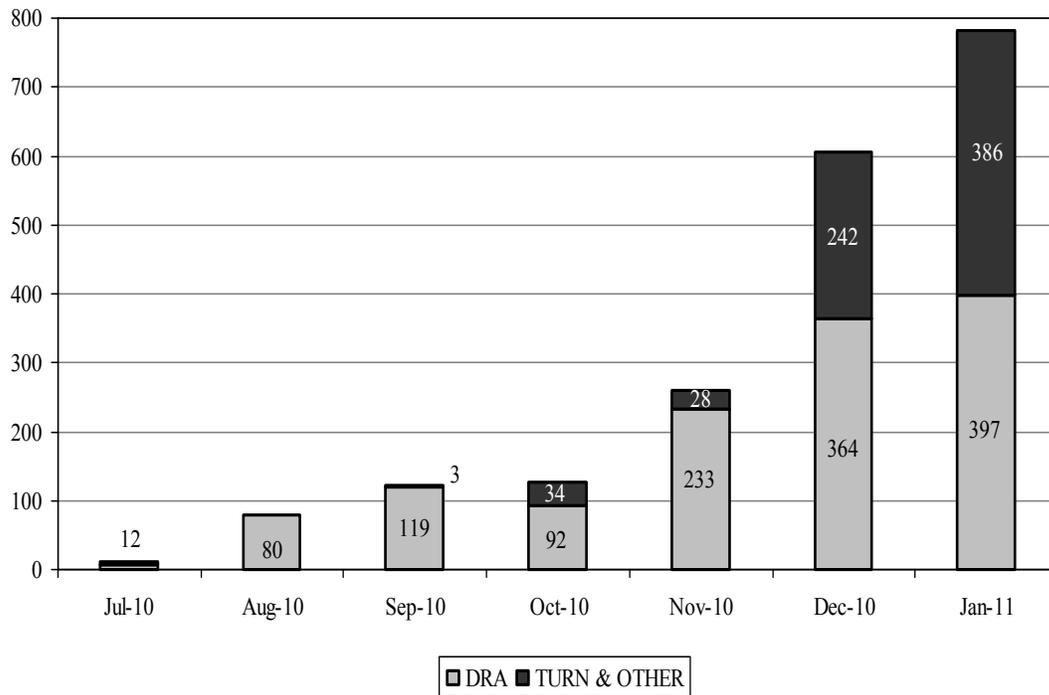
As shown in Figure II-1 below, SCE received an enormous amount of discovery during the closing period of 2010 and the beginning of 2011. Notably, DRA has had SCE's testimony, workpapers, and Master Data Request responses since the Notice of Intent was submitted on July 19, 2010,<sup>14</sup> but DRA only chose to begin propounding its discovery in earnest in November and December of 2010. As indicated in the figure, DRA served an onerous number of data requests on SCE for which responses were due during the Christmas and New Year holiday period.

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<sup>14</sup> Although there were certain changes and corrections between the NOI and Application, as reflected in Exhibit 13 of the Application testimony, the net effect of the changes results in only an approximately \$32 million change to SCE's Base Revenue Requirement. Further, SCE only made changes to its forecast and testimony that were agreed to by DRA. The vast majority of the testimony remains unchanged from the NOI, and DRA has had plenty of time to develop its positions.

**Figure II-1**  
**Data Request Summary – As of 1/21/11**

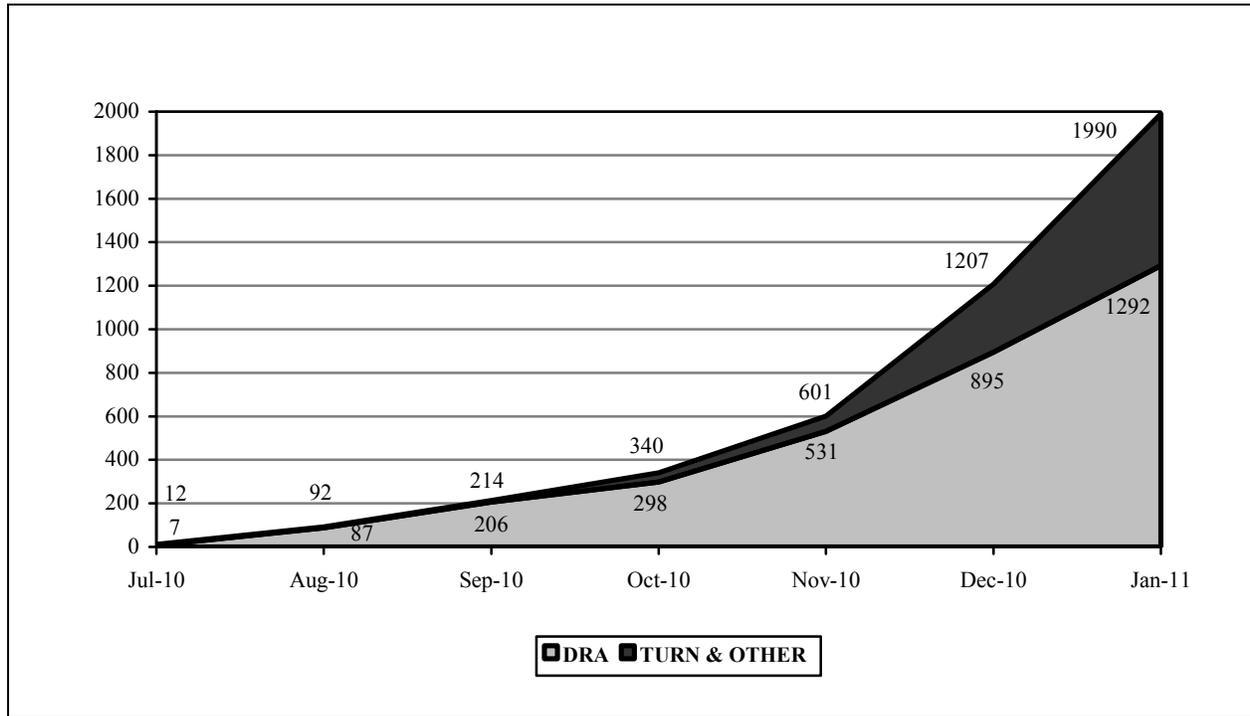
Number of Questions Received – Broken Down by Subparts



To provide an additional view on discovery, Figure II-2 below shows the cumulative data requests that SCE received from DRA, TURN, and other parties.

**Figure II-2**  
**Cumulative Data Requests Received by 1/21/11**

Number of Questions Received – Broken Down by Subparts



**3. Timeliness of SCE Responses to Discovery**

Despite this extensive volume of discovery, SCE’s responses have been timely. The generally recognized standard in Commission proceedings is to respond to data requests within 10 business days of receipt. As of Monday, January 17, 2011, SCE has achieved an average response time of 7.2 business days. SCE requests that when the time comes for SCE to conduct discovery of other parties, DRA and other intervenors also provide responsive and timely answers.

**4. Duplication of Discovery**

In SCE’s last GRC, the Commission provided guidance that DRA and intervenors should coordinate their efforts and minimize duplication. President Peevey stated that:

I am asking parties to build upon their prior efforts in similar cases to increase their level of coordination and cooperation. To the fullest extent possible, I urge parties to jointly plan their analysis with the goal to avoid repetition, present joint analysis of issues, and consider joint presentations of witnesses and unified cross-examination.<sup>15</sup>

However, SCE has already experienced widespread duplication in the discovery conducted to date. For example, on January 3, 2011, TURN asked the following question:

In account 594.140 (SCE-3 v. 4 pt 6, p.124), there was an increase of \$5 million between 2008 and 2009 due to an adjustment to record the related expense of UG [underground] capital work. Describe fully the reason for the change in the convention by which a portion of the UG capital work is expensed.<sup>16</sup>

Two days later, DRA asked essentially the same question:

For Sub-Account 594.140 . . . SCE states its non-labor expenses increased between 2008 and 2009 by \$5.009 million due to an adjustment to record the related expense component of underground capital work. Provide a detailed and itemized listing of associated expenses as well as the documentation that explains the adjustment to record the related expense component of underground capital work in more detail.<sup>17</sup>

To take a second example, DRA and TURN both asked for the same bid and assumption information regarding SCE's International Financial Reporting Standards project.<sup>18</sup>

SCE believes that, consonant with President Peevey's guidance, DRA and intervenors can and should coordinate their efforts to minimize duplication and maximize efficient processing of this GRC. To date, such coordination has not occurred.

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<sup>15</sup> A. 07-11-011, Scoping Memo and Ruling of Assigned Commissioner, p. 5.

<sup>16</sup> Data Request TURN-SCE-013, question 18(a).

<sup>17</sup> Data Request DRA-SCE-074-TLG, question 11(g).

<sup>18</sup> Compare Data Request DRA-061-DFB, question 1 with Data Request TURN-SCE-10, questions 4(b) and (c).

**5. The Administrative Law Judge Can Help Parties Coordinate Their Discovery and Analysis of SCE's Showing**

DRA and the intervenors should receive guidance from the Commission and the Administrative Law Judge (“ALJ”) in coordinating their discovery and analysis. Such guidance is warranted for at least two reasons. First, as discussed above, when left to their own devices these parties have not coordinated their discovery efforts. Second, DRA, TURN, and others have expressed concerns about their level of resources to process this GRC in a timely fashion. Coordination of discovery and analysis will allow for more efficient utilization of DRA’s, TURN’s, and other parties’ resources, and minimize duplicative work by those resources.

Toward that end, SCE respectfully suggests that the Commission and the ALJ direct DRA and the intervenors to meet and confer on coordination of discovery and analysis. The parties should also be directed to report to the Commission and the ALJ on the results of their efforts at coordination.

**D. Electronic Discovery Support**

**1. Accessing SCE's Application, Testimony and Workpapers**

SCE’s Application, prepared testimony, and supporting workpapers are available in several media designed to facilitate parties’ review of our showing, conduct of discovery, and participation in hearings:

- a. CD-ROMs, which can be obtained by e-mailing a request to [scegrc@sce.com](mailto:scegrc@sce.com), and [russell.worden@sce.com](mailto:russell.worden@sce.com);
- b. PDF files, which can be directly accessed at SCE’s website. To access these PDF files from SCE’s website, go the following URL:
  1. Go to [www.sce.com/applications](http://www.sce.com/applications)
  2. Scroll down to “2012 GRC” and click on the link.

3. The 2012 GRC application and testimony are presented in Adobe Acrobat (pdf) format and can be viewed online, printed, or saved to your hard drive.

## **2. Data Requests**

To propound a data request to SCE, please e-mail your data request to [scegrc@sce.com](mailto:scegrc@sce.com), [russell.worden@sce.com](mailto:russell.worden@sce.com), and [susan.dibernardo@sce.com](mailto:susan.dibernardo@sce.com). SCE's non-confidential data responses are available on a secure website, accessible by means of a log-in ID and password. To request a log-in ID and password, please e-mail your request to [scegrc@sce.com](mailto:scegrc@sce.com), [russell.worden@sce.com](mailto:russell.worden@sce.com), and [susan.dibernardo@sce.com](mailto:susan.dibernardo@sce.com). For access to SCE's confidential data request responses, please refer to the section below regarding Protection of Confidential Materials.

## **E. Protection of Confidential Materials**

SCE's 2012 GRC Application is supported by thousands of pages of testimony. A small subset of SCE's testimony, workpapers, and data request responses contain confidential information and have been provided to DRA subject to Public Utilities Code Section 583 and General Order 66(c). To provide a procedure that will allow other parties to this proceeding to review confidential documents while still maintaining their confidentiality, SCE will enter into a nondisclosure agreement with permissible parties to govern access to the confidential materials. For the benefit of the parties, SCE included its proposed nondisclosure agreement as Attachment C to its application.

SCE is not requesting any action by the Commission with respect to its nondisclosure agreement. Prior to presenting any dispute relating to confidentiality or the nondisclosure agreement to the Commission, SCE will first meet and confer with the disputing party and attempt to resolve the dispute in good faith, as required under Commission Rule 11.3.

**F. Proposed Testimony Standards**

The Commission's Rate Case Plan has substantive, in addition to procedural, requirements. Commission Staff and other parties are also required to comply with a Standard Requirements List of Documentation supporting their testimony, set forth on page A-34 of D.07-07-004. SCE's experience in past proceedings is that not all parties have complied with these requirements in preparing their written testimony, such as omitting workpapers to support calculations. SCE requests that the Scoping Memorandum memorialize the understanding that Commission staff and intervenor testimony will also be subject to the requirements of the Standard Requirements List.

During the course of the proceeding, SCE (and other parties) will likely discover errors. SCE will provide corrections to prepared testimony in the form of errata exhibits, distributed to other parties prior to witnesses taking the stand. In the interest of making the most efficient use of limited hearing time, SCE encourages other parties to follow that procedure as well.

**G. Proposed Briefing Standards**

In prior GRC proceedings, the Commission has sought to limit the length of opening and reply briefs.<sup>19</sup> In 2009, SCE committed to keeping its brief to a 300-page limit. For this 2012 GRC, SCE again recommends that the Commission set a reasonable page limitation and order that it apply to all parties.

In addition, to aid the Commission and all parties, SCE also proposes that the Commission order all parties to follow a common briefing outline. Based on prior proceedings, SCE has found that a common briefing outline helps the Commission and other parties understand the issues in common and internally navigate within such lengthy and complex documents. The specifics of the outline can be determined towards the end of evidentiary

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<sup>19</sup> Indeed, in SCE's 2003 GRC, the Commission struck portions of SCE's opening brief and ordered SCE to refile that brief in accordance with a maximum page limitation of 300 pages. *See, e.g.*, Administrative Law Judge's Ruling, April 30, 2003, p. 2.

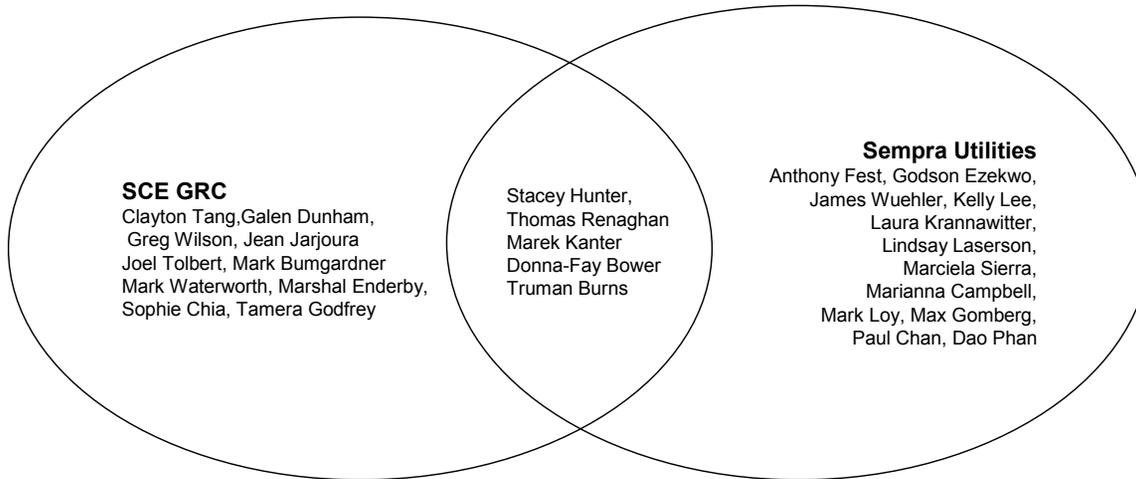
hearings, but SCE recommends that the Commission consider adopting this process for this proceeding.

**H. Very Few DRA Analysts Are Working on Both GRCs**

DRA has suggested that it cannot analyze and litigate the concurrent GRCs without lengthy delays in the procedural schedule. However, an analysis of the DRA staffing on the respective SCE and Sempra utilities' GRCs appears to contradict DRA's position. There is a minimal overlap in staffing; only five DRA analysts are working on both GRCs. Please refer to the figure below.

**Figure II-3**  
**DRA Analysts**

DRA Analysts  
SCE & Sempra Utilities  
2012 GRCs



**I. Measures To Mitigate Resource Constraints**

On January 10, 2011, San Diego Gas & Electric Company and the DRA jointly sent a letter to the Commission's Executive Director proposing a delay in the submittal date for the utility's Phase 2 rate design testimony. The reasons given for this request included relieving the burden on parties with limited resources who are participating in multiple proceedings.

Following up on this initiative, SCE similarly contacted DRA to explore the latter's interest in seeking a delay in Phase 2 of SCE's 2012 GRC ("SCE's Phase 2 Application"). DRA and SCE have submitted a joint letter to the Commission's Executive Director that proposes a delay in the submittal date for SCE's Phase 2 Application. SCE and DRA also propose to consolidate SCE's Phase 2 Application with A.10-09-002 in order to enable DRA, the Commission, and other parties to more efficiently consider both applications in one proceeding.

As an additional measure to help address any resource issues, SCE respectfully suggests that the Commission may wish to consider whether other resources within the Commission, such as personnel in the Telecommunications or Water branches, might be deployed in some capacity to help process the electric utility GRCs.

**J. Supplemental Testimony**

**1. Testimony In Compliance With Resolution E-4364**

On December 20, 2010, the Commission issued Resolution E-4364 which addressed SCE's request for disposition of a balance that had been accumulated in the Electric Deferred Refund Account as of December 31, 2009. While the Resolution resolved some of the issues pertaining to that request, the Commission also directed SCE to address some of the issues in its 2012 GRC:

SCE shall seek to include in Phase 1 of its 2012 general rate case (GRC) consideration of its method for apportioning the balance in the Gross Revenue Sharing

Tracking Account (GRSTA) between CPUC- and FERC- jurisdictional revenue requirements.

SCE intends to submit the supplemental testimony as directed by Resolution E-4364 by January 31, 2011.

**2. Supplemental Testimony Addressing Effects Of Recently Enacted Tax Legislation**

On December 17, 2010, President Obama signed the Tax Relief, Unemployment Insurance Reauthorization, and Job Creation Act of 2010 (2010 Act), which made some significant changes to federal income tax law. SCE filed this GRC Application on November 23, 2010 and the prepared testimony, workpapers, and revenue requirement calculations in that Application, including the tax calculations, reflect applicable law at the time the Application was filed. Therefore the 2010 Act was not reflected in SCE's 2012 GRC Application.

Once an application is filed, the Commission's Rate Case Plan for energy utilities (D.89-01-040, D.07-07-004) expressly prohibits "bulk or major updating" except as provided in the GRC update phase. However, the GRC update phase allows revisions to reflect inflation rate changes and "known changes due to governmental action." SCE has not yet completed its analysis of the impact of the 2010 Act on its estimated 2012 revenue requirement. In part this is due to the fact that the Internal Revenue Service has not yet issued regulations providing guidance on the new tax legislation. Once an analysis has been completed, SCE proposes to submit revised calculations of its estimated 2012 revenue requirements that reflect the 2010 Act for the update phase of this GRC, or sooner if so directed by the Commission.

**3. Supplemental Testimony Concerning Rate Changes**

In the Rate Case Plan, the Standard Requirements List for Documentation Supporting an NOI states that:

Revenues at present rates in the Results of Operations report shall include a base case derived directly from

authorized tariffs in effect on or after May 1 prior to tendering the NOI and on or after October 1 prior to filing the application. The utility shall update the results of operations exhibit by January 15 to incorporate any and all tariff changes which become effective on January 1 following the filing of the application.<sup>20</sup>

SCE notes that on January 18, 2011, the Sempra utilities supplemented their showing to address the update requirement. The requirement does not apply to SCE, because our rates did not change between October 1, 2010 and the present day. Accordingly, SCE did not provide updated testimony to address this requirement in January 2011.

**K. Public Participation Hearings**

SCE anticipates that a ruling will be issued setting forth the schedule for Public Participation Hearings. As in the past, SCE will provide input to those hearings consistent with the Commission's directions and at any locations chosen by the Commission.

**L. Prehearing Conference Statement of the National Asian American Coalition, et al.**

On January 18, 2011, SCE received the Prehearing Conference Statement filed by the National Asian American Coalition, Black Economic Council, and Latino Business Chamber of Greater Los Angeles (collectively, the "Joint Parties"). The Joint Parties identified a partial list of issues they intend to raise. Rather than address them in this Prehearing Conference Statement, to the extent the Joint Parties raise these or other substantive issues in written testimony or briefs, SCE will similarly address them in testimony or briefs. SCE respectfully disagrees with certain assertions and factual contentions made in the Joint Parties' Prehearing Conference Statement, but does not intend to respond to all of them at this time.

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<sup>20</sup> Rate Case Plan, Appendix A, p. A-30, section 3.

## **1. SCE's Response to the Joint Parties' Motion**

SCE notes that many of the items raised by the Joint Parties were originally included in the Joint Parties' Motion Requesting Party Status ("Joint Parties' Motion"). SCE respectfully refers the Commission to SCE's Response to the Joint Parties' Motion, filed on January 12, 2011. In that pleading, among other items SCE responded to:

- the Joint Parties' request to delay the GRC in light of current economic conditions;<sup>21</sup>
- the Joint Parties' request to delay the GRC due to the pending OIR on diversity issues;<sup>22</sup>
- the Joint Parties' contentions regarding solar programs in California;<sup>23</sup>
- the Joint Parties' contentions regarding the SmartConnect revenue requirements;<sup>24</sup> and
- the Joint Parties' characterization of SCE's pension benefits program.<sup>25</sup>

## **2. The Commission Has Already Decided That It Can Simultaneously Process Multiple GRCs**

The Joint Parties urge that "there should be a time separation of at least six months, and possibly nine months, between the Edison and Sempra cases."<sup>26</sup> DRA and TURN made similar arguments in the Sempra utilities' GRC, and the Commission rejected these arguments, noting that "[t]he Commission and DRA have sufficient resources to process simultaneous test-year" GRCs.<sup>27</sup> The Commission added that "we can also expect to

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<sup>21</sup> SCE's Response to Joint Motion, pp. 2-3.

<sup>22</sup> *Id.* at pp. 6-7.

<sup>23</sup> *Id.* at pp. 5-6.

<sup>24</sup> *Id.* at p. 6.

<sup>25</sup> *Id.* at pp. 4-5.

<sup>26</sup> Joint Parties' Prehearing Conference Statement, p. 3.

<sup>27</sup> D.08-07-046, p. 40.

successfully conduct rate cases for Edison as well as SDG&E and SoCalGas for test year 2012.”<sup>28</sup> 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.<sup>29</sup>

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

### **3. SCE’s Philanthropic Contributions Are Outside the Scope of this Rate Case**

The Joint Parties indicate that they plan to raise the issue of SCE’s level of philanthropic contributions, and intend to suggest that SCE’s philanthropic contributions be set “at a minimum of 2% of pretax income.”<sup>30</sup> This issue has been decided in prior GRCs (SCE’s and those of the other California IOUs).

The Commission has ruled that the level and nature of a utility’s philanthropic contributions is outside the scope of a rate case. Indeed, it is outside the bounds of the Commission’s jurisdiction. *See* D.09-03-025, p. 309 (“the Commission has no jurisdiction over a utility’s charitable contributions”); D.06-05-016, p. 83 (“However, as we have previously indicated, we have no jurisdiction to order a change in SCE’s giving practices.”); D.08-07-046, p. 73 (“Philanthropy is not an allowable cost in SDG&E and SoCalGas’ revenue requirement: this Commission cannot and will not include in rates collected from customers any payments by a regulated utility for philanthropic purposes.”); D.09-06-052, p. 5 (“First, we have repeatedly held that corporate philanthropic contributions are generally a shareholder matter, not a ratepayer

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<sup>28</sup> *Id.*

<sup>29</sup> D.10-12-018, p. 7 (Ellipses in original, internal quotes omitted).

<sup>30</sup> Joint Parties’ Prehearing Conference Statement, p. 6.

issue. Accordingly, philanthropic contributions are not an issue for resolution in this ratesetting proceeding.”).<sup>31</sup>

SCE views philanthropy as an important part of SCE’s role in the communities it serves. But this rate case is not the forum to litigate the issue. The Joint Parties’ attempt to raise it must be rejected.

### **III.**

#### **CONCLUSION**

SCE appreciates the opportunity to submit this Prehearing Conference Statement. We look forward to discussing these matters further at the joint prehearing conference, and the subsequent prehearing conference dedicated to the SCE GRC. Both of these conferences are scheduled for January 31, 2010.

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<sup>31</sup> As President Peevey has explained, the California Supreme Court has found that amounts related to charitable contributions must be excluded from authorized rates. *See* D.09-06-052, p. 5. Following the California Supreme Court’s decision, the Commission adopted a policy that it would not, as part of its ratemaking responsibilities, interject itself into utility management decisions regarding corporate philanthropy. *Id.*

Respectfully submitted,

FRANK A. MCNULTY  
KRIS G. VYAS

/s/ Kris G. Vyas

By: Kris G. Vyas

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January 26, 2011

**Attachment A**

2012 GRC Witness Cross Estimates

SCE WITNESS	EXHIBIT(S)	VOLUME	CHAPTER/ PART	SUBJECT AREA	SCE	DRA	TURN	ARem	WPTF	IEP	N.A.A.C._L.B.C.G.L.A._B.E.C	Total	No. Days	Dates Certain	Unavail. Dates	
SCE WITNESSES																
Al Pothrer	SCE-01_Policy	-	Ch. I - XI	Policy												
	SCE-01_Policy	-	Ch. XII	Policy												
Russell Worden	SCE-02_Generation	VOL 1	Ch. I	Nuclear Policy & SONGS 2&3 O&M												
	SCE-06_HR	VOL 2	Ch. III-V	HR - Benefits & Other Compensation												
	SCE-10_R/O	VOL 1	Ch. X	R/O - Requested Rev. Requirements, Rate-making, Sales Forecast, OOR, Cost Escalation, Post-Test Year Rate-making												
	SCE-13_Differences	-	Ch. III	Differences Between NOI and Application												
Joe Sheppard	SCE-02_Generation	VOL 1	Ch. I	Nuclear Policy & SONGS 2&3 O&M												
Jake Lefman	SCE-02_Generation	VOL 1	Ch. II-IV, XIII-XVI	Nuclear Policy & SONGS 2&3 O&M												
Doug Bauder	SCE-02_Generation	VOL 1	Ch. V-IX, XI-XII	Nuclear Policy & SONGS 2&3 O&M												
	SCE-02_Generation	VOL 2	Ch. III	SONGS 2 & 3 Capital Expenditures												
Loyd Wright	SCE-02_Generation	VOL 1	Ch. X	Nuclear Policy & SONGS 2&3 O&M												
Kim Murray	SCE-02_Generation	VOL 1	Ch. XVII	Nuclear Policy & SONGS 2&3 O&M												
	SCE-02_Generation	VOL 3	Ch. I-V	Palo Verde O&M												
	SCE-02_Generation	VOL 4	Ch. I-V	Palo Verde Capital												
	SCE-02_Generation	VOL 5	Ch. I-VII	Power Production Generation Policy												
Mark Nelson	SCE-02_Generation	VOL 10C	Ch. I, III-V	CONFIDENTIAL-PDD/Fuel Cell Technology/Solar PV												
	SCE-02_Generation	VOL 10	Ch. I, III-V	PDD/Fuel Cell Technology/Solar PV												
Tom Ware	SCE-02_Generation	VOL 6	Part 1 (Ch. I-V)	Coal O&M												
	SCE-02_Generation	VOL 6	Part 2 (Ch. IX-XII)	Coal Capital												
	SCE-02_Generation	VOL 6	Part 3	Coal Capital Update Pursuant to D.10-10-016												
	SCE-02_Generation	VOL 6	Part 1 (Ch. I, VII-VIII)	Coal O&M												
Paul Phelan	SCE-02_Generation	VOL 6	Part 2 (Ch. XIII)	Coal Capital												
	SCE-02_Generation	VOL 8C	Ch. VII	CONFIDENTIAL-Mountainview (Gas)												
	SCE-02_Generation	VOL 8	Ch. VII	Mountainview (Gas)												
	SCE-02_Generation	VOL 9	Ch. III	Peakers (Gas)												

SCE WITNESS	EXHIBIT(S)	VOLUME	CHAPTER/ PART	SUBJECT AREA	SCE	DRA	TURN	AROM	WPTF	IEP	NAAC_LBCCLA_BEC	Total	No. Days	Dates Certain	Unavail. Dates
Anthony Kurpakus	SCE-02_Generation	VOL 7	Part 1	Hydro O&M											
	SCE-02_Generation	VOL 7	Part 2	Hydro Capital											
Ian Cuthbertson	SCE-02_Generation	VOL 8C	Ch. I-VI	CONFIDENTIAL-Mountainview (Gas)											
	SCE-02_Generation	VOL 8	Ch. I-VI	Mountainview (Gas)											
Allen Laven	SCE-02_Generation	VOL 9	Ch. I-V	Peakers (Gas)											
Russell Harding	SCE-02_Generation	VOL 10C	Ch. II	CONFIDENTIAL-PDD/Fuel Cell Technology/Solar PV											
	SCE-02_Generation	VOL 10	Ch. II	PDD/Fuel Cell Technology/Solar PV											
Ronald Hite	SCE-02_Generation	VOL 11	Ch. III	Catalina											
James Kelly	SCE-03_TDBU	VOL 1	Ch. I-VI	TDBU - Policy											
Doug Kim	SCE-03_TDBU	VOL 2	Ch. I-V	TDBU - Advanced Technology											
Robert Woods	SCE-03_TDBU	VOL 3	Part 1 & 2	TDBU - Electric System Planning & Load Growth Programs											
Roger Lee	SCE-03_TDBU	VOL 3	Part 3	TDBU - Infrastructure Replacement Programs											
Patricia Atoms	SCE-03_TDBU	VOL 3	Part 4 (Ch. I)	TDBU - Transmission & Interconnection Planning											
Kenneth Varnell	SCE-03_TDBU	VOL 3	Part 5 (Ch. II)	TDBU - Engineering Design & Project Management											
David Berndt	SCE-03_TDBU	VOL 4	Part 1 (Ch. I)	TDBU - Customer Driven Programs											
Melvin Stark	SCE-03_TDBU	VOL 4	Part 2 (Ch. II)	TDBU - Inspection & Maintenance											
Paul Grigaux	SCE-03_TDBU	VOL 4	Part 3 (Ch. I)	TDBU - Distribution Planning & Field Accounting											
Gregg Kludjian	SCE-03_TDBU	VOL 4	Part 4 (Ch. II)	TDBU - Resource Planning & Performance Management											
Henry Martinez	SCE-03_TDBU	VOL 4	Part 5 (Ch. I)	TDBU - Grid Operations											
Julio Arencibia	SCE-03_TDBU	VOL 4	Part 6 (Ch. II)	TDBU - Distribution Construction & Maintenance											
Kenneth Trainor	SCE-03_TDBU	VOL 4	Part 7 (Ch. I)	TDBU - Substation Construction & Maintenance											
Walter Spansel	SCE-03_TDBU	VOL 4	Part 8 (Ch. II)	TDBU - Transmission											
Gregg Ferree	SCE-03_TDBU	VOL 5	Part 1	TDBU - Business Process & Technology Integration											
Edward Antillon	SCE-03_TDBU	VOL 5	Part 2	TDBU - Technical Services											
Tracee Reeves	SCE-03_TDBU	VOL 5	Part 3 & 4	TDBU - Business, Regulatory & Financial Planning & TDBU Other Costs & OOR											

2012 GRC Witness Cross Estimates

SCE WITNESS	EXHIBIT(S)	VOLUME	CHAPTER/ PART	SUBJECT AREA	SCE	DRA	TURN	ARem	WPTF	IEP	NAAC_LBCGLA_BEC	Total	No. Days	Dates Certain	Unavail. Dates	
Lynda Ziegler	SCE-04_CSBU	VOL 1	Ch. III, VII	CSBU - Policy												
Kevin Ellison	SCE-04_CSBU	VOL 2	Ch. III	Customer Service Operations: Meter Services Organization, Meter Reading												
	SCE-04_CSBU	VOL 4	Ch. II	Customer Service Capital, Capitalized Software & OOR												
	SCE-04_CSBU	VOL 3	Ch. I-II	CS&ID												
Lisa Cagnolatti	SCE-04_CSBU	VOL 1	Ch. IV-VI	CSBU - Policy												
	SCE-04_CSBU	VOL 2	Ch. III-IV	Customer Service Operations												
	SCE-04_CSBU	VOL 3	Ch. III-IV	CS&ID												
	SCE-04_CSBU	VOL 4	Ch. I-II	Customer Service Capital, Capitalized Software & OOR												
Harry Hutchison	SCE-04_CSBU	VOL 2	Ch. I-II	Customer Service Operations												
	SCE-04_CSBU	VOL 2	Ch. III	Customer Service Operations: Revenue Services Organization												
Charlie Hu	SCE-04_CSBU	VOL 4	Ch. III	Customer Service Capital, Capitalized Software & OOR												
	SCE-04_CSBU	VOL 2	Ch. III	Customer Service Operations: Customer Communication Organization												
Lorena Miller	SCE-04_CSBU	VOL 4	Ch. III	Customer Service Capital, Capitalized Software & OOR												
	SCE-04_CSBU	VOL 2	Ch. III	Customer Service Operations: Customer Services												
	SCE-04_CSBU	VOL 3	Ch. III	CS&ID												
	SCE-04_CSBU	VOL 4	Ch. II, IV	Customer Service Capital, Capitalized Software & OOR												
Gary Green	SCE-04_CSBU	VOL 2	Ch. III	Customer Service Operations: Consumer Choice												
	SCE-04_CSBU	VOL 3	Ch. III	CS&ID												
	SCE-04_CSBU	VOL 4	Ch. II, IV	Customer Service Capital, Capitalized Software & OOR												
	SCE-04_CSBU	VOL 2	Ch. III	Customer Service Operations: Consumer Affairs												
Seth Kiner	SCE-04_CSBU	VOL 3	Ch. III	CS&ID												
	SCE-04_CSBU	VOL 4	Ch. III	Customer Service Capital, Capitalized Software & OOR												
	SCE-04_CSBU	VOL 3	Ch. III	CS&ID												
	SCE-04_CSBU	VOL 4	Ch. III-IV	Customer Service Capital, Capitalized Software & OOR												
Les Starck	SCE-04_CSBU	VOL 1	Ch. I	I.T. - Policy												
	SCE-05_I.T.	VOL 2	Ch. I	I.T. - O&M and Capital												
Lawrence Oliva	SCE-05_I.T.	VOL 3	Ch. II	I.T. - Capitalized Software												
	SCE-05_I.T.	VOL 2	Ch. I	I.T. - O&M and Capital												
Mahwash Yazdi	SCE-05_I.T.	VOL 1	Ch. I	I.T. - Policy												
	SCE-05_I.T.	VOL 2	Ch. I	I.T. - O&M and Capital												
Mike Pinter	SCE-05_I.T.	VOL 3	Ch. II	I.T. - Capitalized Software												
	SCE-05_I.T.	VOL 2	Ch. I	I.T. - O&M and Capital												
Jack Huson	SCE-05_I.T.	VOL 1	Ch. I	I.T. - Policy												
	SCE-05_I.T.	VOL 2	Ch. I	I.T. - O&M and Capital												

2012 GRC Witness Cross Estimates

SCE WITNESS	EXHIBIT(S)	VOLUME	CHAPTER/ PART	SUBJECT AREA	SCE	DRA	TURN	ARoM	WPTF	IEP	NAAC_LBCGLA_BEC	Total	No. Days	Dates Certain	Unavail. Dates	
Solomon Tessema	SCE-05_I.T.	VOL 2	Ch. I-II	I.T. - O&M and Capital												
	SCE-05_I.T.	VOL 3	Ch. IV-V	I.T. - Capitalized Software												
John Foulk	SCE-05_I.T.	VOL 2	Ch. I-II	I.T. - O&M and Capital												
	SCE-05_I.T.	VOL 3	Ch. I	I.T. - Capitalized Software												
Kevin Payne	SCE-05_I.T.	VOL 3	Ch. III	I.T. - Capitalized Software												
	SCE-06_HR	VOL 1	Ch. I-II	HR Department												
Patricia Miller	SCE-06_HR	VOL 2	Ch. I-II, IV-VI	HR - Benefits & Other Compensation												
	SCE-06_HR	VOL 1	Ch. II	HR Department												
Lupe Clapp	SCE-06_HR	VOL 1	Ch. III	HR Department												
	SCE-06_HR	VOL 2	Ch. VI	HR - Benefits & Other Compensation												
Randall Loughlin	SCE-07_A&G	VOL 1	Ch. III-XI	HR Department												
	SCE-06_HR	VOL 2	Ch. VI-VII	HR - Benefits & Other Compensation												
Mark Bennett	SCE-06_HR	VOL 2	Ch. VII	HR - Benefits & Other Compensation												
	SCE-06_HR	VOL 2	Appendix B	HR - Total Compensation Study Report												
Alison Peterson (Hewitt Associates LLC)	SCE-07_A&G	VOL 1	Ch. I-II	A&G - Summary & Financial Organizations												
	SCE-07_A&G	VOL 1	Ch. XII	A&G - Risk Control												
Elizabeth Jennemerson	SCE-07_A&G	VOL 2C	Ch. I-IV	CONFIDENTIAL-A&G - Legal (Law, Claims, & Worker's Compensation)												
	SCE-07_A&G	VOL 2	Ch. I-IV	A&G - Legal (Law, Claims, & Worker's Compensation)												
Stephen Pickett	SCE-07_A&G	VOL 2C	Ch. II	CONFIDENTIAL-A&G - Legal (Law, Claims, & Worker's Compensation)												
	SCE-07_A&G	VOL 2	Ch. II	A&G - Legal (Law, Claims, & Worker's Compensation)												
Robert Ramos	SCE-07_A&G	VOL 2C	Ch. III	CONFIDENTIAL-A&G - Legal (Claims)												
	SCE-07_A&G	VOL 2 ?	Ch. III	A&G - Legal - (Claims)												
Theresa Muir	SCE-07_A&G	VOL 2C	Ch. IV	CONFIDENTIAL-A&G - Legal (Worker's Compensation)												
	SCE-07_A&G	VOL 2	Ch. IV	A&G - Legal - (Worker's Compensation)												
Stacy Mines	SCE-07_A&G	VOL 2C	Ch. V	CONFIDENTIAL-A&G - Ethics & Compliance												
	SCE-07_A&G	VOL 2	Ch. V	A&G - Ethics & Compliance												

2012 GRC Witness Cross Estimates

SCE WITNESS	EXHIBIT(S)	VOLUME	CHAPTER/ PART	SUBJECT AREA	SCE	DRA	TURN	ARem	WPTF	IEP	NAAC_LBCGLA_BEC	Total	No. Days	Dates Certain	Unavail. Dates	
Akbar Jazayeri	SCE-07_A&G	VOL 3C	Ch. I	CONFIDENTIAL-A&G - Regulatory Policy & Affairs, Corporate Membership Dues & Fees												
	SCE-07_A&G	VOL 3	Ch. I	A&G - Regulatory Policy & Affairs, Corporate Membership Dues & Fees												
	SCE-07_A&G	VOL 3C	Ch. II-III	CONFIDENTIAL-A&G - Corporate Communication												
Veronica Gutierrez	SCE-07_A&G	VOL 3	Ch. II-III	A&G - Corporate Communication												
	SCE-07_A&G	VOL 3C	Ch. IV	CONFIDENTIAL-A&G - Property & Liability Insurance & Expense												
Stephen Kempey (Marsh Risk & Ins. Svcs.)	SCE-07_A&G	VOL 3	Ch. IV	A&G - Property & Liability Insurance & Expense												
	SCE-08_PPBU	-	Ch. I-II	PPBU - MS & RP												
Gary Stern	SCE-08_PPBU	-	Ch. III, VI	PPBU - ES & M												
Kevin Cini	SCE-08_PPBU	-	Ch. IV	PPBU - RAP												
Marc Ulrich	SCE-08_PPBU	-	Ch. V	PPBU - Finance												
Kenneth Pickrahn	SCE-08_PPBU	-	Ch. I	OSBU - Policy												
Cecil House	SCE-09_Ops Support	VOL 1	Ch. I	OSBU - Policy												
	SCE-09_Ops Support	VOL 3C	Ch. X	OSBU - Capital												
	SCE-09_Ops Support	VOL 3	Ch. X	OSBU - Capital												
Rick Greenwood	SCE-09_Ops Support	VOL 2	Ch. I-III	OSBU - Corporate Environment Health & Safety												
	SCE-09_Ops Support	VOL 3C	Ch. X	OSBU - Capital												
	SCE-09_Ops Support	VOL 3	Ch. X	OSBU - Capital												
Dawn Wilson	SCE-09_Ops Support	VOL 2	Ch. IV	OSBU - Corporate Resources												
	SCE-09_Ops Support	VOL 3C	Ch. X	OSBU - Capital												
	SCE-09_Ops Support	VOL 3	Ch. X	OSBU - Capital												
Jana Monroe	SCE-09_Ops Support	VOL 2	Ch. V	OSBU - Corporate Security												
	SCE-09_Ops Support	VOL 3C	Ch. X	OSBU - Capital												
	SCE-09_Ops Support	VOL 3	Ch. X	OSBU - Capital												
Tom L. Hampton	SCE-09_Ops Support	VOL 2	Ch. VI-VII	OSBU - Operations Support Services												
	SCE-09_Ops Support	VOL 3C	Ch. X	OSBU - Capital												
	SCE-09_Ops Support	VOL 3	Ch. X	OSBU - Capital												

2012 GRC Witness Cross Estimates

SCE WITNESS	EXHIBIT(S)	VOLUME	CHAPTER/ PART	SUBJECT AREA	SCE	DRA	TURN	ARem	WPTF	IEP	NAAC_LBCCLA_BEC	Total	No. Days	Dates Certain	Unavail. Dates	
Joe Alderete	SCE-09_Ops Support	VOL 2	Ch. VIII	OSBU - Supplier Diversity & Development												
	SCE-09_Ops Support	VOL 3C	Ch. X	OSBU - Capital												
	SCE-09_Ops Support	VOL 3	Ch. X	OSBU - Capital												
Alan Riddle	SCE-09_Ops Support	VOL 2	Ch. IX	OSBU - Transportation Services												
	SCE-09_Ops Support	VOL 3C	Ch. X	OSBU - Capital												
	SCE-09_Ops Support	VOL 3	Ch. X	OSBU - Capital												
Douglas Snow	SCE-10_R/O	VOL 1	Ch. I-IV, VI, VIII-IX	R/O - Present Rate Revenue												
	SCE-10_R/O	VOL 1	Ch. IV	R/O - Requested Rev. Requirements, Rate-making, Sales Forecast, OOR, Cost Escalation, Post-Test Year Rate-making												
John Gillies	SCE-10_R/O	VOL 1	Ch. V	R/O - Sales Forecast												
Russell Garwacki	SCE-10_R/O	VOL 1	Ch. VI	R/O - Present Rate Revenue												
Todd Cameron	SCE-10_R/O	VOL 1	Ch. VII	R/O - Cost Escalation												
	SCE-10_R/O	VOL 1	Ch. X	R/O - Post-Test Year Rate-making												
Paul Hunt	SCE-10_R/O	VOL 2C	Ch. IV	R/O - Rate Base (Customer Deposits)												
	SCE-10_R/O	VOL 2	Ch. IV	R/O - Rate Base (Customer Deposits)												
	SCE-11_Productivity	-	Ch. I - XI	Productivity												
Kevin Shimmel	SCE-10_R/O	VOL 2C	Ch. I	R/O - Summary of Electric Plant												
	SCE-10_R/O	VOL 2	Ch. I	R/O - Summary of Electric Plant												
Richard Bennett	SCE-10_R/O	VOL 2C	Ch. II	R/O - Depreciation Expense & Reserves												
	SCE-10_R/O	VOL 2	Ch. II	R/O - Depreciation Expense & Reserves												
	SCE-10_R/O	VOL 3	Ch. I-V	R/O - Depreciation												
Patricia Y Wong	SCE-10_R/O	VOL 2C	Ch. III	R/O - Taxes (except Property Taxes)												
	SCE-10_R/O	VOL 2	Ch. III	R/O - Taxes (except Property Taxes)												
Glenn Bridges	SCE-10_R/O	VOL 2C	Ch. III	R/O - Property Taxes												
	SCE-10_R/O	VOL 2	Ch. III	R/O - Property Taxes												

SCE WITNESS	EXHIBIT(S)	VOLUME	CHAPTER/ PART	SUBJECT AREA	SCE	DRA	TURN	AReM	WPTF	IEP	NAAC_LBCGLA_BEC	Total	No. Days	Dates Certain	Unavail. Dates	
Brent Fielder	SCE-10_R/O	VOL 2C	Ch. IV	R/O - Rate Base (excluding customer deposits)												
	SCE-10_R/O	VOL 2	Ch. IV	R/O - Rate Base (excluding customer deposits)												
Randy Lisbin	SCE-12_Compliance	-	Ch. III	Compliance												

\*\*\*Please note intervenors is based on who filed a Protest or Motion

**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) PREHEARING CONFERENCE STATEMENT 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 **26th day of January, 2011**, at Rosemead, California.

/s/ Andrea Moreno  
Andrea Moreno  
Project Analyst  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770



California Public  
Utilities Commission

CPUC Home

## CALIFORNIA PUBLIC UTILITIES COMMISSION

### Service Lists

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**PROCEEDING: A1011015 - EDISON - FOR AUTHORI**  
**FILER: SOUTHERN CALIFORNIA EDISON COMPANY**  
**LIST NAME: LIST**  
**LAST CHANGED: JANUARY 14, 2011**

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ASSOCIATION

### Information Only

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## CALIFORNIA PUBLIC UTILITIES COMMISSION

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