

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Joint Application of Southern California Edison )	
Company (U 338-E) and San Diego Gas & )	Application No. 14-12-XXX
Electric Company (U 902-E) to Find the 2014 )	
SONGS Units 2 and 3 Decommissioning Cost )	
Estimate Reasonable and Address Other Related )	
<u>Decommissioning Issues.</u>	

**JOINT APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) AND  
SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR 2014 SONGS UNITS 2 & 3  
DECOMMISSIONING COST ESTIMATE AND RELATED DECOMMISSIONING ISSUES**

WALKER A. MATTHEWS, III  
ESTHER K. PARK

Attorneys for  
SOUTHERN CALIFORNIA EDISON CO.

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone:(626) 302-6879  
Facsimile: (626) 302-3990  
E-mail:walker.matthews@sce.com

EMMA D. SALUSTRO

Attorney for  
SAN DIEGO GAS & ELECTRIC CO.

101 Ash Street  
Post Office Box 1831  
San Diego, California 92101-3017  
Telephone:(619) 696-4328  
Facsimile: (619) 699-5027  
E-mail:ESalustro@semprautilities.com

**Dated: December 10, 2014**

**JOINT APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY  
(U 338-E) AND SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR 2014  
SONGS UNITS 2 & 3 DECOMMISSIONING COST ESTIMATE AND RELATED  
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**JOINT APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) AND  
SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR 2014 SONGS UNITS 2 & 3  
DECOMMISSIONING COST ESTIMATE AND RELATED DECOMMISSIONING ISSUES**

Pursuant to Articles 2 and 3 of the California Public Utilities Commission (CPUC or Commission) Rules of Practice & Procedure, Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E) (hereinafter collectively referred to as the “Utilities”), hereby respectfully submit a Joint Application regarding the 2014 Decommissioning Cost Estimate for the San Onofre Nuclear Generating Station (SONGS) Unit Nos. 2 & 3 and the relief requested herein.

**I.**

**INTRODUCTION AND SUMMARY**

**A. Summary of Request**

In this Joint Application, the Utilities respectfully request the Commission:

(1) Find that the updated \$4.411 billion (100% share, 2014\$) SONGS 2 & 3 decommissioning cost estimate (DCE) is reasonable;<sup>1</sup>

(2) Approve SCE’s request to reduce its annual contributions to the SCE SONGS 2 & 3 Nuclear Decommissioning Trust (“NDT”) to \$0.00 (zero) at this time, and SDG&E’s request to reduce its annual contributions to the SDG&E SONGS 2 & 3 NDT to \$0.00 (zero) as of January 1, 2016, based upon the

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<sup>1</sup> SCE and SDG&E intend to conduct a decommissioning cost workshop in connection with its Application, in order to explain the decommissioning cost estimate and accounting practices for decommissioning costs.

current estimate of decommissioning costs, current level of funding of the NDTs, projected escalation rates, and financial market conditions known at this time;

(3) Approve an advice letter process for authorizing disbursements from the SONGS 2 & 3 NDTs, reporting recorded SONGS 2 & 3 decommissioning costs and forecasted costs for future intervals, and reporting remaining NDT balances; and

(4) Authorize a process for the years between the Nuclear Decommissioning Cost Triennial Proceeding (NDCTP) applications that would allow the Utilities to file an application seeking a reasonableness review annually for the costs of decommissioning activities that were completed during the previous calendar year.<sup>2</sup>

SCE also respectfully requests the Commission:

(1) Approve a SONGS Balancing Account for recording unanticipated SONGS 2 & 3 non-decommissioning costs.

SDG&E also respectfully requests the Commission:

- (1) Find that the \$16.662 million (100% share; 2014\$) estimate of SDG&E-only decommissioning costs to be reasonable;
- (2) Find that SDG&E's revised Nuclear Decommissioning revenue requirement request of \$1.07 million [including Franchise Fees and Uncollectibles (FF&U)] is reasonable. This amount reflects SDG&E's request to reduce its annual contribution the SONGS 2 & 3 NDTs to \$0.00 (zero) starting January 1, 2016, as well as SDG&E's already Commission-approved \$1.06 million nuclear decommissioning rate component for Unit 1 Spent Fuel Costs.<sup>3</sup>

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<sup>2</sup> SCE and SDG&E will submit an application and supporting testimony to support a reasonableness review of SONGS costs for 2014, in accordance with Decision (D.) 14-11-040 (SONGS OII Decision). The Utilities propose that following the 2014 reasonableness review, the Commission authorize SCE and SDG&E to submit annual applications for reasonableness reviews of costs for completed decommissioning work, and that SCE submit updated DCEs at three-year intervals via the NDCTP or as otherwise designated by the Commission. For years in which there is an NDCTP application, the Commission would conduct its annual reasonableness review in the NDCTP.

<sup>3</sup> D.13-05-010 (SDG&E TY2012 GRC).

**B. Background**

On June 7, 2013, SCE announced plans to permanently retire SONGS 2 & 3. On June 12, 2013, SCE submitted a Certification of Permanent Cessation of Power Operations to the U.S. Nuclear Regulatory Commission (NRC), certifying that SCE had permanently ceased power operations of SONGS 2 & 3, surrendering SCE's authority to operate the units. SCE submitted to the NRC a Certification of Permanent Removal of Fuel for Unit 3 on June 28, 2013, and for Unit 2 on July 23, 2013. As a result of these submittals, SCE now holds an NRC license that does not permit power operations but does authorize the possession of the SONGS facilities and licensed material. SCE no longer has authority under its operating licenses to load fuel into the SONGS 2 & 3 nuclear reactors.

The permanent retirement of SONGS 2 & 3, approximately nine years before the NRC operating licenses would have expired in 2022, was an unforeseen event and was not anticipated in the decommissioning cost estimates previously submitted to and approved by the CPUC in NDCTPs prior to the plant retirement decision. Given the change of circumstances resulting from the early retirement of SONGS, SCE and SDG&E were unable to complete certain decommissioning planning activities that they would have completed in the years leading up to a planned retirement date.

Under the sequence of events that was previously contemplated, for example, SCE would have submitted a preliminary decommissioning cost estimate for review by NRC and approval by this Commission at least five years prior to a planned retirement date, as required under 10 C.F.R. § 50.75(f)(3). During the five years prior to a planned retirement, SCE would have continued to develop and refine the decommissioning cost estimates and plans. One year prior to a planned retirement, SCE and SDG&E also would have applied for Commission approval to use decommissioning funds to pay for decommissioning planning costs as provided in the Qualified and Non-Qualified Master Trust Agreements:

One year prior to the time decommissioning of a Plant or Plants is estimated to begin, the Company shall apply for CPUC approval of the estimated cost and schedule for decommissioning each Plant or Plants. Upon approval of the cost and schedule for decommissioning each Plant or Plants, the CPUC shall authorize Interim Disbursements from the applicable Fund to pay Decommissioning Costs.<sup>4</sup>

In addition, the timing contemplated by the Master Trust Agreements would have permitted SCE and SDG&E to seek NRC review of a site-specific decommissioning plan and a detailed cost estimate, and obtain disbursements from the NDTs for decommissioning-related planning expenses, as the units approached the expiration of the operating licenses. Given the unanticipated change of timing for SONGS decommissioning, it is no longer possible for SCE or SDG&E to seek NRC review of preliminary decommissioning plans or obtain interim disbursements from the NDTs prior to plant retirement.

To obtain access to the NDTs, SCE submitted Tier 3 Advice Letter (AL) 2968-E and SDG&E submitted Tier 3 AL 2579-E requesting Commission approval for interim disbursements from the NDTs and other relief, in connection with SONGS 2 & 3 decommissioning activities and costs incurred from June 7, 2013 through December 31, 2013. The Utilities explained that they anticipated filing an application in 2014 that would seek Commission approval of a SONGS 2 & 3 site-specific, detailed radiological and non-radiological decommissioning and fuel management cost estimate. In addition, the Utilities proposed an advice letter procedure, consistent with D.11-07-003, through which they would: (1) report on SONGS 2 & 3 decommissioning activities and recorded costs, and (2) seek disbursements from their respective NDTs for SONGS 2 & 3 decommissioning costs incurred in 2014 and future periods. The Utilities also proposed that reasonableness reviews of SONGS decommissioning costs would continue to occur in the NDCTP or other proceeding designated by the Commission.

In accordance with federal regulations, SCE submitted the DCE, Post Shutdown Decommissioning Activities Report (PSDAR), and Irradiated Fuel Management Plan (IFMP) to the NRC on September 23, 2014 on behalf of all the SONGS participants. SCE anticipates that the NRC review process will be completed in December 2014, within approximately 90 days of these submittals.

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<sup>4</sup> Section 2.01(7) of SCE's Master Trust Agreements and Section 2.01(5) of SDG&E's Master Trust Agreements.



In this Application, the Utilities are submitting the SONGS 2 & 3 site-specific DCE for the Commission's approval. The Utilities are also submitting the PSDAR and the IFMP with this Application for the Commission's informational review.

**C. This Application Comports With The Commission's Policy Concerning Decommissioning Costs**

On December 21, 2012, the Utilities filed their most recent joint submission concerning estimated decommissioning costs in Application (A.) 12-12-013, the 2012 NDCTP.<sup>5</sup> As noted above, SCE announced its plans to permanently retire SONGS 2 & 3 on June 7, 2013, after A.12-12-013 was filed for the 2012 NDCTP. During the 2012 NDCTP proceeding,<sup>6</sup> SCE informed the Commission that it would prepare an updated, site-specific SONGS 2 & 3 decommissioning cost estimate and other NRC required submittals concerning SONGS decommissioning plans. SCE further indicated that when these initial decommissioning planning activities were complete, the Utilities jointly would submit this Application based on the updated decommissioning costs estimate and plans. Although this Application is not part of the pending NDCTP docket, A.12-12-012, or part of the normal sequence of the NDCTPs, due to the timing of the SONGS 2 & 3 retirement decision, this Application is consistent with the Utilities' stated intentions discussed during the 2012 NDCTP. It also fulfills the objectives established by the Commission in D.10-07-047, in order "[1] to set the annual revenue requirements for the decommissioning trusts for [SONGS 2 & 3] owned by Southern California Edison Company, San Diego Gas & Electric Company, . . . [2] to verify the utilities are in compliance with prior decisions applicable to decommissioning, and [3] to determine whether actual expenditures by the utilities for decommissioning activities are reasonable and prudent."<sup>7</sup> Accordingly, the Application comports with the Commission's objectives established in D.10-07-047 for reviewing decommissioning costs, except that this Application is limited to SONGS 2 & 3 decommissioning:

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<sup>5</sup> As of the date of filing for this Application, the Commission has not issued a final decision on issues pertaining to SCE's and SDG&E's requests in the 2012 NDCTP.

<sup>6</sup> At the direction of the Commission, SCE also submitted in the 2012 NDCTP a July, 2013 update to the ABZ decommissioning cost study.

<sup>7</sup> Decision No. 10-07-047, mimeo, p. 2.

1. With respect to setting the annual revenue requirement for SONGS 2 & 3 decommissioning, the Utilities have determined that contributions to their respective NDTs for SONGS 2 & 3 are not needed at this time based upon the current estimate of decommissioning costs, current level of funding of their respective NDTs, projected escalation rates, and financial market conditions known at this time. The current level of funding in each company's respective NDTs appears sufficient at this time to meet the estimated cost of decommissioning SONGS 2 & 3, as outlined in the DCE. The Utilities provide supporting testimony for this issue in Exhibits SCE-01, SCE-02, SDG&E-01 and SDG&E-02.
2. With respect to compliance requirements, the Utilities are unaware of any specific compliance issues that need to be addressed in this Application. The Utilities generally anticipate that the Commission may establish certain compliance requirements in a final decision for this Application, and that the Utilities will address their compliance with such requirements in subsequent reasonableness review filings and/or the next NDCTP, as directed by the Commission. To the extent any such compliance issues need to be addressed in this proceeding, the Utilities will submit separate testimony, as required, in accordance with the scoping memo and procedural schedule established for this proceeding.
3. With respect to the determination of the reasonableness of actual decommissioning expenditures, the Utilities are submitting the SONGS 2 & 3 DCE for the Commission's approval as reasonable. In accordance with D.14-11-040, the Utilities will submit a separate application and supporting testimony for the Commission's reasonableness review of SONGS 2 & 3 costs incurred in 2014 no later than January 20, 2015. The Utilities will submit applications for reasonableness reviews for future years as directed by the Commission.

## II.

### SUMMARY OF TESTIMONY

#### A. Decommissioning Process and Cost Estimate

SONGS decommissioning will be a long and complex process requiring the balancing of many interests. The Utilities, along with the City of Anaheim and City of Riverside, have determined that the

SONGS decommissioning process will be guided by the core principles and fundamental values of Safety, Stewardship, and Engagement.

As explained in SCE's testimony, the SONGS 2 & 3 decommissioning project consists of three major components: (1) license termination; (2) spent fuel management, storage, transfer, and Independent Spent Fuel Storage Installation (ISFSI) decommissioning; and (3) site restoration. SCE has developed a 20 year plan to complete most decommissioning activities at SONGS. It will not be possible, however, to complete all spent fuel transfer, ISFSI decommissioning, and site restoration activities until after the U.S. Department of Energy (DOE) has removed the last spent fuel from the site. The SONGS decommissioning participants intend to engage a third-party decommissioning operations contractor (DOC) to manage the project, with oversight by SCE and the other SONGS decommissioning participants.

The Utilities began accumulating funds for the eventual decommissioning of SONGS Units 2 & 3 early in the Units' operating lives. Because the Units were licensed to operate for several decades, decommissioning fund accumulations were based on conceptual cost estimates. Following the SONGS retirement decision, SCE engaged the consortium of EnergySolutions and Chicago Bridge & Iron Company (ES/CBI) to develop a new, site-specific decommissioning cost estimate for SONGS 2 & 3. In contrast to previous conceptual cost estimates, the ES/CBI DCE was designed to provide an executable project schedule and initial budget for execution of all SONGS 2 & 3 decommissioning activities. The ES/CBI DCE reflects the best efforts of both SCE and ES/CBI to provide the most accurate information currently available regarding SONGS 2 & 3 decommissioning costs. The DCE for SONGS decommissioning is \$4.411 billion (100% share, 2014\$), and includes costs necessary for (1) radiological decontamination/license termination; (2) spent fuel management and storage, and ISFSI decommissioning; and (3) site restoration.

The Utilities provide supporting testimony regarding the decommissioning process and DCE in Exhibits SCE-01 and SDG&E-01. SDG&E also provides supporting testimony for SDG&E-only decommissioning costs in Exhibit SDG&E-01.

In addition, as noted above, the Utilities will coordinate with Energy Division and other interested parties to schedule a decommissioning cost workshop in connection with this Application, in

order to explain the DCE and accounting practices for decommissioning costs. At the workshop, the Utilities also will seek to develop formats for presenting decommissioning costs and cost comparisons to enhance transparency and increase the amount of summary information available while preserving a brief and accessible document.

**B. Contribution Levels for the Utilities' Respective Nuclear Decommissioning Trusts**

The Utilities used four key elements to determine their proposed decommissioning funds contribution requirements at this time: (1) the updated, site-specific DCE and, in SDG&E's case, an SDG&E-only cost estimate, (2) escalation projections, (3) estimates of after-tax rates of return, and (4) current decommissioning trust balances. SCE requests the Commission authorize contributions to its SONGS 2 & 3 NDTs of \$0.00 (zero) at this time, and SDG&E requests the Commission authorize contributions to its SONGS 2 & 3 NDTs of \$0.00 (zero) as of January 1, 2016, based upon the current estimate of decommissioning costs, current level of funding of the NDTs, projected escalation rates, and financial market conditions known at this time.

The Utilities provide supporting testimony for this issue, including related tax matters, in Exhibits SCE-02 and SDG&E-02.

**C. Advice Letter Process**

In supporting testimony for this Application, SCE proposes an advice letter process for SONGS 2 & 3 decommissioning consistent with the Commission's direction to PG&E in D.11-07-003 and D.14-02-024, through which the Utilities would seek Commission: (1) approval of disbursements for SONGS 2 & 3 decommissioning costs incurred, and (2) review SONGS 2 & 3 decommissioning activities and recorded costs. Specifically, the Utilities propose submitting advice letters at least once during each calendar year regarding SONGS 2 & 3 decommissioning containing a summary of: (1) all previous funding requests and trust withdrawals, summarized by major cost categories, correlated to the most recent Commission-adopted cost study, and including nominal dollar adjustment; and (2) major cost categories for which trust withdrawals are requested, and for which previously requested funds were expended.

The advice letters will also provide a list of work to be performed in each major cost category and the estimated disbursement amounts required to cover the cost. Lastly, the advice letters will

provide a graph that tracks the forecasted and actual decommissioning expenditures from project inception through the end of the period covered by the previous advice letter, and a forecast of future project expenditures.

The Utilities provide supporting testimony regarding the proposed advice letter process in Exhibits SCE-01 and SDG&E-01.

**D. Annual Reasonableness Reviews**

The advice letter process described above would facilitate ongoing Commission oversight of SONGS 2 & 3 decommissioning expenditures relative to the project budget and schedule on a chronological basis in order to allow access to the NDTs. It would not, however, take the place of Commission's established process for performing reasonableness reviews of decommissioning expenditures.

The Utilities propose in this Application that the Commission authorize the Utilities to file an application seeking an annual reasonableness review of costs for decommissioning activities that were completed during the previous calendar year. This process, if approved, will allow for a more frequent review cycle than provided in the NDCTP, so that the Commission can review costs sooner.

SCE provides supporting testimony regarding the proposed annual reasonableness review process in Exhibit SCE-01.

**E. Balancing Account**

SCE also requests authority to establish a two-way balancing account, which will be used to record SONGS Operations and Maintenance expense that cannot be funded from the decommissioning trusts.

SCE provides supporting testimony regarding this ratemaking proposal in Exhibit SCE-02.

**F. Ratemaking**

SDG&E requests that the Commission find reasonable SDG&E's revised Nuclear Decommissioning revenue requirement request of \$1.07 million (including FF&U). This amount reflects SDG&E's current request to reduce its annual contribution the SONGS 2 & 3 NDTs to \$0.00 (zero) starting January 1, 2016, as well as SDG&E's already Commission-approved \$1.06 million

nuclear decommissioning rate component for Unit 1 Spent Fuel Costs.<sup>8</sup> SCE requests the Commission approve SCE's ratemaking proposal in Exhibit SCE-2.

### III.

#### **STATUTORY AND PROCEDURAL REQUIREMENTS**

##### **A. Statutory Authority**

This Joint Application is made pursuant to Sections 451, 454, and 701 of the Public Utilities Code. In addition, this request complies with the Commission's Rules, and prior decisions, orders and resolutions of this Commission.

##### **B. Compliance With Commission Rule Of Practice And Procedure 2.1**

Commission Rule 2.1 requires that "[a]ll applications shall state clearly and concisely the authorization or relief sought; shall cite by appropriate reference the statutory provision or other authority under which Commission authorization or relief is sought, shall be verified by at least one applicant . . . ; and . . . shall state the following: (a) [applicant information]; (b) [applicant service information]; (c) The proposed category for the proceeding, the need for hearing, the issues to be considered, and a proposed schedule. . . .; (d) Such additional information as may be required by the Commission in a particular proceeding." California Public Utilities Code § 1701.1(c)(3) defines ratesetting as "cases in which rates are established for a specific company, including, but not limited to, general rate cases, performance-based ratemaking, and other ratesetting mechanisms." SCE and SDG&E propose this application be designated as a "ratesetting" proceeding.

The Utilities anticipate that hearings will be necessary in this proceeding, and have prepared a proposed procedural schedule, as shown below.

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<sup>8</sup> D.13-05-010 (SDG&E TY2012 GRC).

**Table III-1**  
**Nuclear Decommissioning Joint Application**

Application Filed/Supporting Testimony Submitted	December 10, 2014
Prehearing Conference	TBD
Intervener Testimony	May 15, 2015
Rebuttal Testimony	June 1, 2015
Evidentiary Hearings	Mid-to-late June, 2015
Opening Briefs	July 31, 2015
Reply Briefs	August 14, 2015
Proposed Decision Issued	September 14, 2015

The principal issues to be considered in this Application concern the reasonableness of the Utilities': (1) DCE for SONGS 2 & 3 and SDG&E's cost estimate; (2) proposal for reducing the annual contributions to their respective NDTs to \$0.00 (zero); (3) proposal for an advice letter process for obtaining disbursements from their respective NDTs; (4) proposal for an annual reasonableness review process; and (5) other ratemaking proposals.

**C. Legal Name And Correspondence**

**1. SCE**

SCE is a corporation organized and existing under the laws of the State of California, and is primarily engaged in the business of generating, purchasing, transmitting, distributing and selling electric energy for light, heat and power in portions of central and southern California as a public utility subject to the jurisdiction of the Commission. SCE's properties, substantially all of which are located within the State of California, primarily consist of hydroelectric and thermal electric generating plants, together with transmission and distribution lines and other property necessary in connection with its business.

SCE's principal place of business is 2244 Walnut Grove Avenue, Rosemead, California, and its post office address and telephone number are:

Southern California Edison Company  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-1212

Correspondence or communications regarding this application should be addressed to:

Walker A. Matthews Senior Attorney Southern California Edison Company 2244 Walnut Grove Avenue Rosemead, CA 91770 Telephone: (626) 302-6879 Facsimile: (626) 302-3990 E-mail: <a href="mailto:walker.matthews@sce.com">walker.matthews@sce.com</a>	Esther Park Attorney Southern California Edison Company 2244 Walnut Grove Avenue Rosemead, CA 91770 Telephone: (626) 302-7172 Facsimile: (626) 302-6795 E-mail: <a href="mailto:esther.park@sce.com">esther.park@sce.com</a>
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To request a copy of this application, please contact:

Raquel Ippoliti  
Southern California Edison Company  
P. O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, CA 91770  
Telephone: (626) 302-6699  
Facsimile: (626) 302-3119

**2. SDG&E**

SDG&E is a public utility organized and existing under the laws of the State of California. The location of SDG&E's principal place of business is 8306 Century Park Court, San Diego, California 92123. Correspondence or communications regarding this application should be addressed to:

Emma D. Salustro  
Attorney for San Diego Gas & Electric Co.  
101 Ash Street, HQ12B  
San Diego, CA 92101-3017  
Telephone: (619) 696-4328  
Facsimile: (619) 699-5027  
Email: [ESalustro@semprautilities.com](mailto:ESalustro@semprautilities.com)



To request a copy of this application, please contact:

Wendy Johnson  
Regulatory Affairs Business Manager  
San Diego Gas & Electric Company  
9305 Lightwave Avenue  
Mail Location: SD1190  
San Diego, CA 92123  
Telephone: (858) 654-1185  
E-mail: wdjohnson@semprautilities.com

**D. Articles Of Incorporation**

**1. SCE**

A copy of SCE's Certificate of Restated Articles of Incorporation, effective on March 2, 2006, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 14, 2006, in connection with Application No. 06-03-020, and is incorporated herein by this reference pursuant to Rule 2.2 of the Commission's Rules of Practice and Procedure.

A copy of SCE's Certificate of Determination of Preferences of the Series D Preference Stock filed with the California Secretary of State on March 7, 2011, and presently in effect, certified by the California Secretary of State, was filed with the Commission on April 1, 2011, in connection with Application No. 11-04-001, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series E Preference Stock filed with the California Secretary of State on January 12, 2012, and a copy of SCE's Certificate of Increase of Authorized Shares of the Series E Preference Stock filed with the California Secretary of State on January 31, 2012, and presently in effect, certified by the California Secretary of State, were filed with the Commission on March 5, 2012, in connection with Application No. 12-03-004, and are incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series F Preference Stock filed with the California Secretary of State on May 5, 2012, and presently in effect, certified by the California Secretary of State, was filed with the Commission on June 29, 2012, in connection with Application No. 12-06-017, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series G Preference Stock filed with the California Secretary of State on January 24, 2013, and presently in effect, certified by the California Secretary of State, was filed with the Commission on January 31, 2013, in connection with Application No. 13-01-016, and is incorporated herein by this reference.

A copy of SCE's Certificate of Determination of Preferences of the Series H Preference Stock filed with the California Secretary of State on February 28, 2014, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 24, 2014, in connection with Application No. 14-03-013, and is incorporated herein by this reference.

Certain classes and series of SCE's capital stock are listed on a "national securities exchange" as defined in the Securities Exchange Act of 1934 and copies of SCE's latest Annual Report to Shareholders and its latest proxy statement sent to its stockholders has been filed with the Commission with a letter of transmittal dated March 14, 2014, pursuant to General Order Nos. 65-A and 104-A of the Commission.

## **2. SDG&E**

SDG&E is a corporation duly created under the laws of the State of California. A certified copy of the Restated Articles of Incorporation of San Diego Gas & Electric Company presently in effect and certified by the California Secretary of State was filed with the Commission on September 10, 2014, in connection with SDG&E's Application No. 14-09-008 and is incorporated herein by reference.

## **E. CEQA Compliance**

Rule 2.4(c) states that any application for authority to undertake a project that is statutorily or categorically exempt from CEQA requirements shall so state, with citation to the relevant authority. CEQA does not apply to this application. Public Resources Code section 21080(b)(8) states that CEQA does not apply to the "establishment, modification, structuring, restructuring, or approval of rates, tolls, fares, or other charges by public agencies."

**F. Rule 3.2**

This Application, if granted, will result in a rate decrease. The Utilities interpret Section 454 of the Public Utilities Code and Rule 3.2 as requiring applications requesting any rate change to contain the following data.

**1. Balance Sheet and Income Statement – Rule 3.2(a)(1)**

Appendices A and B to this application contain copies of SCE's and SDG&E's balance sheets and income statements as of September 30, 2014, the most recent period available.

**2. Present and Proposed Rates – Rule 3.2(a)(2) and (a)(3)**

The cost-recovery mechanism proposal and the projected impact on rates are summarized below.

a) SCE

SCE is requesting to update its revenue requirement for SONGS 2 & 3 NDTs from \$22.99 million to \$0.0 million, a decrease of 100% percent annually beginning January 1, 2015, when compared to total system revenues at present rates (as of August 2014). The attached Appendix G is a copy of SCE's Notification of Application to Change Electric Rates (Bill Insert), submitted to the Commission's Public Advisor's Office for approval.

b) SDG&E

SDG&E is requesting to update its revenue requirement for SONGS 2 & 3 NDTs from \$8.07 million to \$0.0 million, a decrease of 100% percent annually beginning no earlier than January 1, 2016, when compared to total system revenues at present rates (as of December 2014). The attached Appendix H is a copy of SDG&E's Notification of Application to Change Electric Rates (Bill Insert). SDG&E received approval of the draft Bill Insert from the Commission's Public Advisor's Office on December 5, 2014.

A statement of all SDG&E's presently effective electric and gas rates can be viewed electronically by accessing: <http://www.sdge.com/rates-regulations/current-and-effective-tariffs/current-and-effective-tariffs>.

**3. Description of SCE's Service Territory and Utility System – Rule 3.2(a)(4)**

Because this submittal is not a general rate application, this requirement is not applicable.

**4. Summary of Earnings – Rule 3.2(a)(5)**

Rule 3.2(a)(5) requires:

A summary of earnings (rate of return summary) on a depreciated rate base for the test period or periods upon which applicant bases its justification for an increase.

SCE's 2014 Adopted Summary of Earnings Summary of Earnings, is attached hereto as Appendix E.

SDG&E's Summary of Earnings (for the total utility operations for the company) for the nine-month period ending September 30, 2014, is attached hereto as Appendix F.

**5. Depreciation – Rule 3.2(a)(7)**

Because this submittal is not a general rate application, this requirement is not applicable.

**6. Capital Stock and Proxy Statement – Rule 3.2(a)(8)**

Because this submittal is not a general rate application, this requirement is not applicable.

**7. Statement Pursuant to Rule 3.2(a)(10)**

Rule 3.5(a)(10) requires the applicant to state whether its request is limited to passing through to customers "only increased costs to the corporation for the services or commodities furnished by it."

This Application requests a rate decrease and there will be no pass through of costs.

**8. Service of Notice – Rule 3.2(b), (c), and (d)**

A list of the cities and counties affected by the rate changes resulting from this application are attached as Appendices C and D for SCE and SDG&E, respectively.

As provided in Rule 3.2(b) – (d), notice of filing of this application will be: (1) mailed to the appropriate officials of the state and the counties and cities listed in Appendices C and D; (2) published in a newspaper of general circulation in each county in SCE’s and SDG&E’s service territory within which the rate changes would be effective; and (3) mailed to all customers affected by the proposed changes.

**G. Index Of Exhibits and Appendices To This Application**

SCE and SDG&E hereby incorporate by reference into this Joint Application the following exhibits:

*Table III-2  
List of Exhibits*

<u>Exhibit No.</u>	<u>Title</u>
SCE-1 <sup>2</sup>	Testimony on the Nuclear Decommissioning of SONGS 2 & 3
SCE-2	Testimony on Summary and Comparison of Trust Fund Performance
SCE-3	SCE Witness Qualifications
SDG&E-1	Prepared Direct Testimony in Support of the 2014 Decommissioning Cost Estimates
SDG&E-2	Prepared Direct Testimony (Financial Modeling, Trust Fund Contributions and Ratemaking)

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<sup>2</sup> The site-specific DCE, IFMP), and PSDAR are included in Appendix A to Exhibit SCE-01.

**Table III-3**  
**List of Appendices**

<u>Appendix No.</u>	<u>Title</u>
A	SCE's Balance Sheet and Income Statement
B	SDG&E's Balance Sheet and Income Statement
C	SCE's Cities and Counties List
D	SDG&E's Cities and Counties List
E	SCE's Summary of Earnings
F	SDG&E's Summary of Earnings
G	SCE's Bill Insert
H	SDG&E's Bill Insert

**IV.**

**CONCLUSION**

In this Joint Application, the Utilities respectfully request the Commission:

- (1) Find that the updated \$4.411 billion (100% share, 2014\$) SONGS 2 & 3 DCE is reasonable;
- (2) Approve the reduction to \$0.00 (zero) for contributions to the SCE SONGS 2 & 3 NDTs at this time, and approve the reduction to \$0.00 (zero) for contributions to the SDG&E SONGS 2 & 3 NDTs starting January 1, 2016, based upon the current estimate of decommissioning costs, current level of funding of the NDTs, projected escalation rates, and financial market conditions known at this time;
- (3) Approve an advice letter process for authorizing disbursements from the SONGS 2 & 3 NDTs, reporting recorded SONGS 2 & 3 decommissioning costs and forecasted costs for future intervals, and reporting remaining NDT balances; and
- (4) Authorize an annual reasonableness review process between the NDCTP that allows SCE and SDG&E to file an application seeking a reasonableness review annually for the costs of decommissioning activities that were completed during the previous calendar year.

SCE respectfully requests the Commission:

- (1) Approve a SONGS Balancing Account for recording unanticipated SONGS 2 & 3 non-decommissioning costs;

SDG&E respectfully requests the Commission:

(1) Find that the \$16.662 million (100% share; 2014\$) estimate of SDG&E-only decommissioning costs to be reasonable; and

(2) Find that SDG&E's revised Nuclear Decommissioning revenue requirement request of \$1.07 million (including FF&U) is reasonable.

WALKER A. MATTHEWS, III  
ESTHER K. PARK

By: /s/ Walker A. Matthews, III  
Walker A. Matthews, III  
Attorneys for:  
SOUTHERN CALIFORNIA EDISON  
COMPANY  
2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6879  
Facsimile: (626) 302-3990  
E-mail: [walker.matthews@sce.com](mailto:walker.matthews@sce.com)

EMMA D. SALUSTRO

By: /s/ Emma D. Salustro  
Emma D. Salustro  
Attorney for:  
SAN DIEGO GAS & ELECTRIC COMPANY  
101 Ash Street  
Post Office Box 1831  
San Diego, California 92101-3017  
Telephone: (619) 696-4328  
Facsimile: (619) 699-5027  
E-mail: [Esalustro@semprautilities.com](mailto:Esalustro@semprautilities.com)

Dated: December 10, 2014

**VERIFICATION**

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10<sup>th</sup> day of December, 2014, at Rosemead, California.

*/s/ William M Petmecky III*

William M Petmecky III

Vice President and Treasurer

SOUTHERN CALIFORNIA EDISON COMPANY



**VERIFICATION**

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of December, 2014, at San Diego, California.

*/s/ Lee Schavrien*

Lee Schavrien, Finance, Regulatory and Legislative Affairs  
Senior Vice President  
SAN DIEGO GAS & ELECTRIC COMPANY

**Appendix A**

**SCE's Balance Sheet and Income Statement**

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET  
SEPTEMBER 30, 2014  
ASSETS  
(in millions)

UTILITY PLANT:

Utility plant, at original cost *	\$ 36,137
Less- accumulated provision for depreciation and decommissioning *	<u>7,997</u>
	28,140
Construction work in progress	3,648
Nuclear fuel, at amortized cost	<u>131</u>
	<u>31,919</u>

OTHER PROPERTY AND INVESTMENTS:

Nonutility property - less accumulated depreciation of \$72	69
Nuclear decommissioning trusts	4,741
Other investments	<u>149</u>
	<u>4,959</u>

CURRENT ASSETS:

Cash and equivalents	49
Receivables, less allowances of \$70 for uncollectible accounts	1,190
Accrued unbilled revenue	998
Inventory	265
Derivative assets	103
Regulatory assets	1,170
Deferred income taxes	0
Other current assets	<u>489</u>
	<u>4,264</u>

DEFERRED CHARGES:

Regulatory assets	7,329
Derivative assets	245
Other long-term assets	<u>387</u>
	<u>7,961</u>
	<u>\$ 49,103</u>

\* Detailed by class on following pages.

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET  
SEPTEMBER 30, 2014  
CAPITALIZATION AND LIABILITIES  
(in millions)

CAPITALIZATION:

Common stock	\$	2,168
Additional paid-in capital		608
Accumulated other comprehensive loss		(8)
Retained earnings		8,237
Common shareholder's equity		<u>11,005</u>
Preferred and preference stock		2,070
Long-term debt		9,523
Total capitalization		<u>22,598</u>

CURRENT LIABILITIES:

Short-term debt		679
Current portion of long-term debt		500
Accounts payable		1,446
Customer deposits		214
Derivative liabilities		154
Regulatory liabilities		794
Deferred income taxes		126
Other current liabilities		1,117
		<u>5,030</u>

DEFERRED CREDITS:

Deferred income taxes and credits		8,182
Derivative liabilities		947
Pensions and benefits		1,015
Asset retirement obligations		2,960
Regulatory liabilities		6,387
Other deferred credits and other long-term liabilities		1,984
		<u>21,475</u>
	\$	<u>49,103</u>

SOUTHERN CALIFORNIA EDISON COMPANY

**(h) A balance sheet as of the latest available date, together with an income statement covering the period from close of last year for which an annual report has been filed with the Commission to the date of the balance sheet attached to the application.**

STATEMENT OF INCOME  
NINE MONTHS ENDED SEPTEMBER 30, 2014

(In millions)

OPERATING REVENUE	<u>\$ 10,276</u>
OPERATING EXPENSES:	
Fuel	219
Purchased power	4,344
Other operation and maintenance	2,187
Depreciation, decommissioning and amortization	1,248
Property and other taxes	232
Impairment and other charges	231
Total operating expenses	<u>8,461</u>
OPERATING INCOME	1,815
Interest and other income	105
Interest expense	(402)
Other expenses	<u>(52)</u>
INCOME BEFORE INCOME TAX	1,466
INCOME TAX	<u>310</u>
NET INCOME	1,156
Less: Dividends on preferred and preference stock	<u>84</u>
NET INCOME AVAILABLE FOR COMMON STOCK	<u><u>\$ 1,072</u></u>

**Appendix B**

**SDG&E's Balance Sheet and Income Statement**

**SAN DIEGO GAS & ELECTRIC COMPANY  
BALANCE SHEET  
ASSETS AND OTHER DEBITS  
SEPTEMBER 30, 2014**

	<b>1. UTILITY PLANT</b>	<u>2014</u>
101	UTILITY PLANT IN SERVICE	\$13,265,270,702
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	85,194,000
105	PLANT HELD FOR FUTURE USE	13,092,995
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	850,382,133
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(4,186,909,599)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(410,449,684)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(687,632)
118	OTHER UTILITY PLANT	924,585,477
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(259,751,909)
120	NUCLEAR FUEL - NET	-
	TOTAL NET UTILITY PLANT	<u>10,284,477,205</u>

	<b>2. OTHER PROPERTY AND INVESTMENTS</b>	
121	NONUTILITY PROPERTY	5,947,314
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(364,300)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>1,086,913,134</u>
	TOTAL OTHER PROPERTY AND INVESTMENTS	<u>1,092,496,148</u>

Data from SPL as of November 20, 2014

**SAN DIEGO GAS & ELECTRIC COMPANY  
BALANCE SHEET  
ASSETS AND OTHER DEBITS  
SEPTEMBER 30, 2014**

<b>3. CURRENT AND ACCRUED ASSETS</b>		2014
131	CASH	8,179,251
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	500
136	TEMPORARY CASH INVESTMENTS	8,600,000
141	NOTES RECEIVABLE	-
142	CUSTOMER ACCOUNTS RECEIVABLE	325,835,707
143	OTHER ACCOUNTS RECEIVABLE	27,346,788
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(3,306,398)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	1,037,349
151	FUEL STOCK	5,915,837
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	60,643,228
156	OTHER MATERIALS AND SUPPLIES	-
158	ALLOWANCES	119,762,814
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	355,489
165	PREPAYMENTS	187,946,741
171	INTEREST AND DIVIDENDS RECEIVABLE	379,618
173	ACCRUED UTILITY REVENUES	66,408,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	3,140,584
175	DERIVATIVE INSTRUMENT ASSETS	122,719,561
	<b>TOTAL CURRENT AND ACCRUED ASSETS</b>	<b>934,965,069</b>
<b>4. DEFERRED DEBITS</b>		
181	UNAMORTIZED DEBT EXPENSE	33,866,452
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	3,415,826,388
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	5,408,508
184	CLEARING ACCOUNTS	773,515
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	69,070,258
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	12,678,902
190	ACCUMULATED DEFERRED INCOME TAXES	546,020,438
	<b>TOTAL DEFERRED DEBITS</b>	<b>4,083,644,461</b>
	<b>TOTAL ASSETS AND OTHER DEBITS</b>	<b>16,395,582,883</b>

Data from SPL as of November 20, 2014



**SAN DIEGO GAS & ELECTRIC COMPANY  
BALANCE SHEET  
LIABILITIES AND OTHER CREDITS  
SEPTEMBER 30, 2014**

**5. PROPRIETARY CAPITAL**

	2014
201 COMMON STOCK ISSUED	(\$291,458,395)
204 PREFERRED STOCK ISSUED	-
207 PREMIUM ON CAPITAL STOCK	(591,282,978)
210 GAIN ON RETIRED CAPITAL STOCK	-
211 MISCELLANEOUS PAID-IN CAPITAL	(479,665,369)
214 CAPITAL STOCK EXPENSE	24,605,640
216 UNAPPROPRIATED RETAINED EARNINGS	(3,680,171,669)
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	7,425,619
TOTAL PROPRIETARY CAPITAL	(5,010,547,152)

**6. LONG-TERM DEBT**

221 BONDS	(3,912,505,000)
223 ADVANCES FROM ASSOCIATED COMPANIES	-
224 OTHER LONG-TERM DEBT	(223,900,000)
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	10,483,578
TOTAL LONG-TERM DEBT	(4,125,921,422)

**7. OTHER NONCURRENT LIABILITIES**

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	(665,589,287)
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	(30,799,317)
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	(123,587,487)
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
230 ASSET RETIREMENT OBLIGATIONS	(870,397,986)
TOTAL OTHER NONCURRENT LIABILITIES	(1,690,374,077)

Data from SPL as of November 20, 2014

**SAN DIEGO GAS & ELECTRIC COMPANY  
BALANCE SHEET  
LIABILITIES AND OTHER CREDITS  
SEPTEMBER 30, 2014**

<b>8. CURRENT AND ACCRUED LIABILITES</b>		2014
231	NOTES PAYABLE	0
232	ACCOUNTS PAYABLE	(426,187,421)
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	(36,331,647)
235	CUSTOMER DEPOSITS	(68,765,920)
236	TAXES ACCRUED	(142,413,013)
237	INTEREST ACCRUED	(56,002,581)
238	DIVIDENDS DECLARED	-
241	TAX COLLECTIONS PAYABLE	(5,069,005)
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	(300,676,506)
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	(36,787,838)
244	DERIVATIVE INSTRUMENT LIABILITIES	(149,662,867)
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	-
TOTAL CURRENT AND ACCRUED LIABILITIES		(1,221,896,798)
<b>9. DEFERRED CREDITS</b>		
252	CUSTOMER ADVANCES FOR CONSTRUCTION	(36,637,985)
253	OTHER DEFERRED CREDITS	(364,727,768)
254	OTHER REGULATORY LIABILITIES	(1,317,940,681)
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	(21,820,437)
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	(1,855,909,283)
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	(749,807,280)
TOTAL DEFERRED CREDITS		(4,346,843,434)
TOTAL LIABILITIES AND OTHER CREDITS		(\$16,395,582,883)

Data from SPL as of November 20, 2014

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**NINE MONTHS ENDED SEPTEMBER 30, 2014**

**1. UTILITY OPERATING INCOME**

400	OPERATING REVENUES		\$3,888,295,041
401	OPERATING EXPENSES	\$2,604,800,533	
402	MAINTENANCE EXPENSES	112,891,857	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	373,934,327	
408.1	TAXES OTHER THAN INCOME TAXES	82,987,508	
409.1	INCOME TAXES	26,163,303	
410.1	PROVISION FOR DEFERRED INCOME TAXES	675,397,703	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(482,264,895)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(2,040,336)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-	
	TOTAL OPERATING REVENUE DEDUCTIONS		3,391,870,000
	NET OPERATING INCOME		496,425,041

**2. OTHER INCOME AND DEDUCTIONS**

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417	REVENUES OF NONUTILITY OPERATIONS	1,578	
417.1	EXPENSES OF NONUTILITY OPERATIONS	-	
418	NONOPERATING RENTAL INCOME	297,497	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	5,399,961	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	25,944,284	
421	MISCELLANEOUS NONOPERATING INCOME	371,195	
421.1	GAIN ON DISPOSITION OF PROPERTY	-	
	TOTAL OTHER INCOME	32,014,515	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
425	MISCELLANEOUS AMORTIZATION	187,536	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	8,038,828	
	TOTAL OTHER INCOME DEDUCTIONS	8,226,364	
408.2	TAXES OTHER THAN INCOME TAXES	496,329	
409.2	INCOME TAXES	(1,789,345)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	8,312,662	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(6,478,028)	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	541,618	
	TOTAL OTHER INCOME AND DEDUCTIONS		23,246,533
	INCOME BEFORE INTEREST CHARGES		519,671,574
	NET INTEREST CHARGES*		140,424,376
	NET INCOME		\$379,247,198

*\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$10,362,273)*

Data from SPL as of November 20, 2014

**SAN DIEGO GAS & ELECTRIC COMPANY  
STATEMENT OF INCOME AND RETAINED EARNINGS  
NINE MONTHS ENDED SEPTEMBER 30, 2014**

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**3. RETAINED EARNINGS**

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$3,300,924,471
NET INCOME (FROM PRECEDING PAGE)	379,247,198
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	0
OTHER RETAINED EARNINGS ADJUSTMENTS	0
RETAINED EARNINGS AT END OF PERIOD	<u>\$3,680,171,669</u>

**Appendix C**

**SCE's Cities and Counties List**



# Incorporated Cities and Counties Served by SCE

## COUNTIES

Fresno	Kern	Madera	Riverside	Tuolumne
Imperial	Kings	Mono	San Bernardino	Tulare
Inyo	Los Angeles	Orange	Santa Barbara	Ventura

## CITIES

Adelanto	Commerce	Hesperia	Los Alamitos	Port Hueneme	Simi Valley
Agoura Hills	Compton	Hidden Hills	Lynwood	Porterville	South El Monte
Alhambra	Corona	Highland	Malibu	Rancho Cucamonga	South Gate
Aliso Viejo	Costa Mesa	Huntington Beach	Mammoth Lakes	Rancho Mirage	South Pasadena
Apple Valley	Covina	Huntington Park	Manhattan Beach	Rancho Palos Verdes	Stanton
Arcadia	Cudahy	Indian Wells	Maywood	Rancho Santa Margarita	Tehachapi
Artesia	Culver City	Industry	McFarland	Redlands	Temecula
Avalon	Cypress	Inglewood	Menifee	Redondo Beach	Temple City
Baldwin Park	Delano	Irvine	Mission Viejo	Rialto	Thousand Oaks
Barstow	Desert Hot Springs	Irwindale	Monrovia	Ridgecrest	Torrance
Beaumont	Diamond Bar	Jurupa Valley	Montclair	Rolling Hills	Tulare
Bell	Downey	La Canada Flintridge	Montebello	Rolling Hills Estates	Tustin
Bell Gardens	Duarte	La Habra	Monterey Park	Rosemead	Twentynine Palms
Bellflower	Eastvale	La Habra Heights	Moorpark	San Bernardino	Upland
Beverly Hills	El Monte	La Mirada	Moreno Valley	San Gabriel	Valencia
Big Bear Lake	El Segundo	La Palma	Murrieta	San Jacinto	Victorville
Bishop	Exeter	La Puente	Newport Beach	San Marino	Villa Park
Blythe	Farmersville	La Verne	Norco	Santa Ana	Visalia
Bradbury	Fillmore	Laguna Beach	Norwalk	Santa Barbara	Walnut
Brea	Fontana	Laguna Hills	Ojai	Santa Clarita	West Covina
Buena Park	Fountain Valley	Laguna Niguel	Ontario	Santa Fe Springs	West Hollywood
Calabasas	Fullerton	Laguna Woods	Orange	Sierra Madre	Westlake Village
California City	Garden Grove	Lake Elsinore	Oxnard	Signal Hill	Westminster
Calimesa	Gardena	Lake Forest	Palm Desert		Whittier
Camarillo	Glendora	Lakewood	Palm Springs		Wildomar
Canyon Lake	Goleta	Lancaster	Palmdale		Woodlake (Three Rivers)
Carpinteria	Grand Terrace	Lawndale	Palos Verdes		Yorba Linda
Carson	Hanford	Lindsay	Paramount		Yucaipa
Cathedral City	Hawaiian Gardens	Loma Linda	Perris		Yucca Valley
Cerritos	Hawthorne	Lomita	Pico Rivera		
Chino	Hemet	Long Beach	Placentia		
Chino Hills	Hermosa Beach		Pomona		
Claremont					

**Appendix D**

**SDG&E's Cities and Counties List**

State of California  
Attorney General's Office  
P.O. Box 944255  
Sacramento, CA 94244-2550

Naval Facilities Engineering  
Command  
Navy Rate Intervention  
1314 Harwood Street SE  
Washing Navy Yard, DC 20374

City of Carlsbad  
Attn. City Attorney  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008-19589

City of Chula Vista  
Attn. City Attorney  
276 Fourth Ave  
Chula Vista, Ca 91910-2631

City of Dana Point  
Attn. City Attorney  
33282 Golden Lantern  
Dana Point, CA 92629

City of Del Mar  
Attn. City Clerk  
1050 Camino Del Mar  
Del Mar, CA 92014

City of Encinitas  
Attn. City Attorney  
505 S. Vulcan Ave.  
Encinitas, CA 92024

City of Escondido  
Attn. City Attorney  
201 N. Broadway  
Escondido, CA 92025

City of Imperial Beach  
Attn. City Clerk  
825 Imperial Beach Blvd  
Imperial Beach, CA 92032

City of Laguna Beach  
Attn. City Clerk  
505 Forest Ave  
Laguna Beach, CA 92651

State of California  
Attn. Director Dept of General  
Services  
PO Box 989052  
West Sacramento, CA 95798-9052

Alpine County  
Attn. County Clerk  
99 Water Street, P.O. Box 158  
Markleeville, CA 96120

City of Carlsbad  
Attn. Office of the County Clerk  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008-19589

City of Coronado  
Attn. Office of the City Clerk  
1825 Strand Way  
Coronado, CA 92118

City of Dana Point  
Attn. City Clerk  
33282 Golden Lantern  
Dana Point, CA 92629

City of El Cajon  
Attn. City Clerk  
200 Civic Way  
El Cajon, CA 92020

City of Encinitas  
Attn. City Clerk  
505 S. Vulcan Ave.  
Encinitas, CA 92024

City of Fallbrook  
Chamber of Commerce  
Attn. City Clerk  
111 S. Main Avenue  
Fallbrook, CA 92028

City of Imperial Beach  
Attn. City Attorney  
825 Imperial Beach Blvd  
Imperial Beach, CA 92032

City of Laguna Beach  
Attn. City Attorney  
505 Forest Ave  
Laguna Beach, CA 92651

United States Government  
General Services Administration  
300 N. Los Angeles  
Los Angeles, CA 90012

Borrego Springs Chamber of  
Commerce Attn. City Clerk  
786 Palm Canyon Dr  
PO Box 420  
Borrego Springs CA 92004-0420

City of Chula Vista  
Attn: Office of the City Clerk  
276 Fourth Avenue  
Chula Vista, California 91910-2631

City of Coronado  
Attn. City Attorney  
1825 Strand Way  
Coronado, CA 92118

City of Del Mar  
Attn. City Attorney  
1050 Camino Del Mar  
Del Mar, CA 92014

City of El Cajon  
Attn. City Attorney  
200 Civic Way  
El Cajon, CA 92020

City of Escondido  
Attn. City Clerk  
201 N. Broadway  
Escondido, CA 92025

City of Fallbrook  
Chamber of Commerce  
Attn. City Attorney  
111 S. Main Avenue  
Fallbrook, CA 92028

Julian Chamber of Commerce  
P.O. Box 1866  
2129 Main Street  
Julian, CA

City of Laguna Niguel  
Attn. City Attorney  
30111 Crown Valley Parkway  
Laguna Niguel, California 92677



City of Laguna Niguel  
Attn. City Clerk  
30111 Crown Valley Parkway  
Laguna Niguel, California 92677

City of Lakeside  
Attn. City Clerk  
9924 Vine Street  
Lakeside CA 92040

City of La Mesa  
Attn. City Attorney  
8130 Allison Avenue  
La Mesa, CA 91941

City of La Mesa  
Attn. City Clerk  
8130 Allison Avenue  
La Mesa, CA 91941

City of Lemon Grove  
Attn. City Clerk  
3232 Main St.  
Lemon Grove, CA 92045

City of Lemon Grove  
Attn. City Attorney  
3232 Main St.  
Lemon Grove, CA 92045

City of Mission Viejo  
Attn: City Clerk  
200 Civic Center  
Mission Viejo, CA 92691

City of Mission Viejo  
Attn: City Attorney  
200 Civic Center  
Mission Viejo, CA 92691

City of National City  
Attn. City Clerk  
1243 National City Blvd  
National City, CA 92050

City of National City  
Attn. City Attorney  
1243 National City Blvd  
National City, CA 92050

City of Oceanside  
Attn. City Clerk  
300 N. Coast Highway  
Oceanside, CA 92054-2885

City of Oceanside  
Attn. City Attorney  
300 N. Coast Highway  
Oceanside, CA 92054-2885

County of Orange  
Attn. County Counsel  
P.O. Box 1379  
Santa Ana, CA 92702

County of Orange  
Attn. County Clerk  
12 Civic Center Plaza, Room 101  
Santa Ana, CA 92701

City of Poway  
Attn. City Clerk  
P.O. Box 789  
Poway, CA 92064

City of Poway  
Attn. City Attorney  
P.O. Box 789  
Poway, CA 92064

City of Ramona  
Attn. City Clerk  
960 Main Street  
Ramona, CA 92065

City of Ramona  
Attn. City Attorney  
960 Main Street  
Ramona, CA 92065

City of Rancho San Diego - Jamul  
Attn. City Clerk  
3855 Avocado Blvd.  
Suite 230  
La Mesa, CA 91941

City of San Clemente  
Attn. City Clerk  
100 Avenida Presidio  
San Clemente, CA 92672

City of San Clemente  
Attn. City Attorney  
100 Avenida Presidio  
San Clemente, CA 92672

City of San Diego  
Attn. Mayor  
202 C Street, 11<sup>th</sup> Floor  
San Diego, CA 92101

County of San Diego  
Attn. County Clerk  
P.O. Box 121750  
San Diego, CA 92101

City of San Diego  
Attn. City Attorney  
1200 Third Ave.  
Suite 1620  
San Diego, CA 92101

County of San Diego  
Attn. County Counsel  
1600 Pacific Hwy  
San Diego, CA 92101

City of San Diego  
Attn. City Clerk  
202 C Street, 2<sup>nd</sup> Floor  
San Diego, CA 92101

City of San Marcos  
Attn. City Clerk  
1 Civic Center Dr.  
San Marcos, CA 92069

City of San Marcos  
Attn. City Attorney  
1 Civic Center Dr.  
San Marcos, CA 92069

City of Santee  
Attn. City Clerk  
10601 Magnolia Avenue  
Santee, CA 92071

City of Santee  
Attn. City Attorney  
10601 Magnolia Avenue  
Santee, CA 92071

City of Solana Beach  
Attn. City Attorney  
635 S. Highway 101  
Solana Beach, CA 92075

Spring Valley Chamber of  
Commerce  
Attn. City Clerk  
3322 Sweetwater Springs Blvd,  
Ste. 202  
Spring Valley, CA 91977-3142

Valley Center Chamber of  
Commerce  
Attn. City Clerk  
P.O. Box 8  
Valley Center, CA 92082

City of Vista  
Attn. City Attorney  
200 Civic Center Drive, Bldg. K  
Vista, CA 92084

City of Vista  
Attn. City Clerk  
200 Civic Center Drive  
Vista, CA 92084

City of Aliso Viejo  
12 Journey  
Aliso Viejo, CA 92656

**Appendix E**

**SCE's Summary of Earnings**

**Southern California Edison  
Summary of Earnings  
2014 GRC Adopted Revenue Requirement  
Thousands of Dollars**

Line No.	Item	Total
1.	<b>Base Revenues</b>	6,148,892
2.	<b>Expenses:</b>	
3.	Operation & Maintenance	2,511,477
4.	Depreciation	1,586,868
5.	Taxes	766,796
6.	Revenue Credits	(157,433)
7.	Total Expenses	4,707,707
8.	<b>Net Operating Revenue</b>	1,441,185
9.	<b>Rate Base</b>	18,292,261
10.	<b>Rate of Return</b>	7.88%

**Appendix F**

**SDG&E's Summary of Earnings**

**SAN DIEGO GAS & ELECTRIC COMPANY  
SUMMARY OF EARNINGS  
NINE MONTHS ENDED SEPTEMBER 30, 2014  
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$3,888
2	Operating Expenses	<u>3,392</u>
3	Net Operating Income	<u><u>\$496</u></u>
4	Weighted Average Rate Base	\$7,102
5	Rate of Return*	7.79%

\*Authorized Cost of Capital

**Appendix G**  
**SCE's Bill Insert**

*Para solicitar una copia de esta notificación en español por favor escribir a:*

Southern California Edison Company  
P.O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

*a la atención de Comunicaciones Corporativas o por medio de correo electrónico a  
gabby.garcia@sce.com*

**SOUTHERN CALIFORNIA EDISON COMPANY (SCE)  
REQUEST TO CHANGE YOUR ELECTRIC RATES DUE TO ALTERATIONS IN THE  
NUCLEAR DECOMMISSIONING TRUST FUND  
APPLICATION NO. A. 14-XX-XXX**

On December \_\_, 2014, Southern California Edison Company (SCE) and San Diego Gas & Electric (SDG&E) (collectively referred to as Utilities) filed a joint application with the California Public Utilities Commission (CPUC) to set the amount each utility customers pays into the nuclear decommissioning trust fund through collected rates. Nuclear decommissioning trust funds were established by the CPUC for funding the decommissioning of San Onofre Nuclear Generating Station (SONGS). Additionally this application will address other related issues associated with San Onofre Nuclear Generating Station (SONGS) Units 2 and 3.

In this application each company is requesting its decommissioning trust fund to be set at \$0.00. The reduction that SCE is requesting is based on the current estimate of decommissioning costs, current level of funding of the trusts, and financial market conditions known at this time. The current annual revenue requirement to cover contributions to SCE's trust funds is \$XXX million. The requested revenue requirement decrease results in an annual decrease of \$XX million or XX% of current funding.

In addition to setting the decommissioning fund to \$0.00, the application addresses related issues, such as:

- (1) approval from the CPUC that 2014 SCE's \$4.411 billion SONGS 2 & 3 decommissioning cost estimate is reasonable;
- (2) approval for a streamlined review process, referred to as a Tier 2 advice letter process for authorizing disbursements from the SONGS 2&3 Nuclear Decommissioning Trusts (NDTs);
- (3) authorization of an annual reasonableness review process; and
- (4) a review of decommissioning costs incurred for SONGS 2 & 3 decommissioning activities completed from June 7, 2013 through December 31, 2014.

SONGS is jointly owned by SCE, San Diego Gas & Electric Company, and the City of Riverside. SCE owns 80% interest in SONGS 1 and 78.21 % interest in SONGS 2 & 3. SDG&E owns 20% interest in SONGS 1, 2, and 3. The City of Riverside owns the remaining 1.79%



interest in SONGS 2 & 3. The Utilities do not seek any additional funding from customers and seek to stop further collection of customer contributions to the NDTs at this time.

## BACKGROUND

On June 7, 2013, SCE announced plans to permanently retire SONGS 2 & 3. During the 2012 Nuclear Decommissioning Cost Triennial Proceeding (A.12-12-013), SCE informed the CPUC that it would prepare an updated SONGS 2 & 3 decommissioning cost estimate. SCE further indicated that when these initial decommissioning planning activities were complete, SDG&E and SCE would submit this application jointly based on the updated decommissioning cost estimate and update each company's nuclear decommissioning trust fund contributions.

For SCE customers, compared to revenue at currently authorized rates, this application could result in a revenue decrease of approximately \$23 million, or 0.2%. **If total rates were to decrease as requested, the residential customer using 600 kilowatt-hours (kWh) per month would see a decrease of \$0.18 per month, from \$124.40 to \$124.22.** The actual impact on your bill may vary depending on your energy usage and other Commission orders.

If this application is approved, the proposed change in rates for each customer class is as follows:

Customer Group	System			Bundled	
	Current Revenues (\$000)	NDC Change (\$000)	% Change	Current Rates (¢/kWh)	Proposed Rate (¢/kWh)
Residential	5,085,101	-7,891	-0.2%	17.60	17.57
Lighting - Small and Medium Power	4,758,394	-7,767	-0.2%	18.31	18.29
Large Power	2,150,238	-5,548	-0.3%	13.03	13.01
Agricultural and Pumping	420,783	-792	-0.2%	14.73	14.70
Street and Area Lighting	136,664	-202	-0.1%	18.78	18.76
Standby	280,779	-781	-0.3%	10.98	10.96
<b>Total</b>	<b>12,831,958</b>	<b>-22,982</b>	<b>-0.2%</b>	<b>16.66</b>	<b>16.63</b>

If SCE's proposed ERRR rate change is approved as requested, an average non-CARE residential electric customer would see a bill decrease of \$ 0.18 per month, from \$124.40 to \$ 124.22.

	Residential Average Monthly Bill		
	Current	Proposed	Change
Non-CARE	\$124.40	\$124.22	-\$0.18
CARE	\$67.95	\$67.86	-\$0.09
Combined	\$106.21	\$106.06	-\$0.15

## FOR FURTHER INFORMATION FROM SCE

As noted above, you may review a copy of this Application and related exhibits at SCE's corporate headquarters (2244 Walnut Grove Avenue, Rosemead, CA 91770). You may also view these materials at the following SCE business offices:

1 Pebbly Beach Rd. Avalon, CA 90704	30553 Rimrock Rd. Barstow, CA 92311	374 Lagoon St., Bishop, CA 93514
505 W. 14 <sup>th</sup> Ave. Blythe, CA 92225	3001 Chateau Rd. Mammoth Lakes, CA 93546	510 S. China Lake Blvd., Ridgecrest, CA 93555
26364 Pine Ave. Rimforest, CA 92378	41694 Dinkey Creek Rd. Shaver Lake, CA 93664	421 W. J St., Tehachapi, CA 93561
120 Woodland Dr., Wofford Heights, CA 93285	6999 Old Woman Springs Rd. Yucca Valley, CA 92284	

Customers with Internet access may view and download the application and the papers supporting it on SCE's web site, [www.sce.com/applications](http://www.sce.com/applications). Anyone who would like to obtain more information about the application, please write to:

Southern California Edison Company  
P.O. Box 800  
2244 Walnut Grove Avenue  
Rosemead, CA 91770  
Attention: Case Administration

### **CPUC PROCESS**

This Application will be assigned to an Administrative Law Judge (Judge) who will determine how to receive evidence and other related documents, necessary for the CPUC to establish a record upon which to base its decision. Evidentiary Hearings (EHs) may be held where parties of record will present their testimony and may be subject to cross-examination by other parties. These EHs are open to the public, but only those who are parties of record can participate. After considering all proposals and all evidence presented during the formal hearing process, the assigned Judge will issue a proposed decision determining whether to adopt all or part of SCE's request, modify it, or deny it. The CPUC Commissioners may sponsor an alternate decision and the issue will be decided at a scheduled Commission Voting Meeting.

As a party of record, the Office of Ratepayer Advocates (ORA) will review this application. ORA is the independent consumer advocate within the CPUC with a legislative mandate to represent investor-owned utility customers to obtain the lowest possible rate for service consistent with reliable and safe service levels. ORA has a multi-disciplinary staff with expertise in economics, finance, accounting and engineering. Other parties of record will also participate in the CPUC's proceeding to consider this application. For more information about ORA, please call (415) 703-1584, e-mail [ora@cpuc.ca.gov](mailto:ora@cpuc.ca.gov) or visit ORA's website at <http://ora.ca.gov/default.aspx>.

**STAY INFORMED**

The CPUC offers a free Subscription Service which is available on the CPUC website at [www.cpuc.ca.gov](http://www.cpuc.ca.gov) which allows you to follow this proceeding. If you would like to learn how you can participate in the proceeding, or if you have informal comments or questions about the CPUC process, you may contact the CPUC's Public Advisor's Office (PAO) at the address noted below. When writing, please reference proceeding A.14-XX-XXX. All written correspondence and emails are provided to the Commissioners and the assigned Judge for this proceeding to review.

Write: CPUC Public Advisor's Office  
505 Van Ness Avenue  
San Francisco, CA 94102

Email: [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov)  
TTY: 1-866-836-7825 Phone: 866-849-8390

**Appendix H**

**SDG&E's Bill Insert**

**Para más detalles llame at 1-880-311-7343**

**SAN DIEGO GAS & ELECTRIC COMPANY  
REQUEST TO CHANGE YOUR ELECTRIC RATES DUE TO ALTERATIONS IN THE  
NUCLEAR DECOMMISSIONING TRUST FUND  
APPLICATION NO. A. 14-12-XXX**

On December 10, 2014, San Diego Gas & Electric Company (SDG&E<sup>®</sup>) and Southern California Edison Company (SCE) filed a joint application (A. 14-12-XXX) with the California Public Utilities Commission (CPUC) to set the amount each utility's customers pay into the nuclear trust fund through collected rates. Nuclear decommissioning trust funds were established by the CPUC for funding the decommissioning (shutting down, dismantling and managing safe storage of fuel used at the San Onofre Nuclear Generating Station (SONGS)). Additionally this application will address other related issues associated with SONGS' generating stations, Units 2 and 3<sup>1</sup>.

In this application SDG&E is requesting the contribution to its decommissioning trust fund to be set at \$0.00, a decrease from the current contribution of \$8.17 million. This reduction from the current contribution is based on the current estimate of decommissioning costs, current level of funding of the trusts, and financial market conditions known at this time.

In addition to setting the decommissioning fund contribution to \$0.00, the application addresses SDG&E's related issues, such as:

- (1) a finding that SCE's 2014 estimate of \$4.411 billion for decommissioning SONGS is reasonable (SDG&E is responsible for 20% of these costs);
- (2) a finding that SDG&E's additional cost estimate of \$16.99 million is reasonable;
- (3) approval of a streamlined process, known as the Tier 2 advice letter process, for authorizing disbursements from the Nuclear Decommissioning Trusts; and
- (4) authorization of an annual reasonableness review process.

**BACKGROUND**

On June 7, 2013, SCE announced plans to permanently retire SONGS 2 & 3. During the 2012 Nuclear Decommissioning Cost Triennial Proceeding (A.12-12-013), SCE informed the CPUC that it would prepare an updated SONGS 2 & 3 decommissioning cost estimate. SCE further indicated that when these initial decommissioning planning activities were complete, SDG&E and SCE would jointly submit this application based on the updated decommissioning cost estimate and update each company's nuclear decommissioning trust fund contributions.

**ILLUSTRATIVE EFFECT ON ELECTRIC RATES AND BILLS**

If the CPUC approves SDG&E's requests, a residential customer living in the inland climate zone who uses 500 kilowatt-hours (kWh) per month could see a winter bill decrease of \$0.09 per month, or 0.1%, a decrease from the current winter bill of \$98.30, to \$98.21. The following table shows the average rate impact by class of customer. The actual rates approved by the CPUC

---

<sup>1</sup> SCE is responsible for 75.7363% of the decommissioning costs for Unit 2 and 75.7475% of the decommissioning costs for Unit 3. SDG&E is responsible for 20% of the decommissioning costs for Units 2 and 3. The City of Riverside is responsible for 1.79% of the decommissioning costs for Units 2 and 3. The City of Anaheim is responsible for the remaining decommissioning costs for Units 2 and 3.

may be higher or lower than those requested by SDG&E. The percentages shown do not necessarily reflect the changes that you may see on your bill. Changes in individual bills will also depend on how much electricity each customer uses.

**SAN DIEGO GAS & ELECTRIC COMPANY – ELECTRIC DEPARTMENT  
ILLUSTRATIVE ELECTRIC RATE IMPACT**

	<b>8/01/14 Class Average Rates</b>	<b>Class Average Rates Reflecting Proposed Revenue Changes</b>	<b>Total Rate Change</b>	<b>Percent Rate Change</b>
	<b>(¢/kWh)</b>	<b>(¢/kWh)</b>	<b>(¢/kWh)</b>	<b>%</b>
<b>Residential</b>	20.515	20.476	(0.039)	-0.19
<b>Small Commercial</b>	23.815	23.776	(0.039)	-0.16
<b>Medium and Large C&amp;I</b>	19.162	19.123	(0.039)	-0.20
<b>Agricultural</b>	19.578	19.539	(0.039)	-0.20
<b>Lighting</b>	17.454	17.415	(0.039)	-0.22
<b>System Total</b>	20.122	20.083	(0.039)	-0.19

**FOR FURTHER INFORMATION**

You may request additional information or obtain a copy of the application and related exhibits by writing to: Wendy Johnson, San Diego Gas & Electric Company, 9305 Lightwave Avenue, SD1190, San Diego, CA 92123. Additionally, a copy of the application and related exhibits may be inspected at the following SDG&E business offices:

436 H St.  
Chula Vista, CA 91910

104 N. Johnson Ave.  
El Cajon, CA 92020

644 W. Mission Ave.  
Escondido, CA 92025

2405 E. Plaza Blvd.  
National City, CA 91950

336 Euclid Ave. #502  
San Diego, CA 92114

2604-B S. El Camino Real  
Carlsbad, CA 92008

440 Beech St.  
San Diego, CA 92101

The application and related exhibits are also available electronically on SDG&E’s website at <http://www.sdge.com/proceedings>.

Copies of this bill insert will be available for viewing and printing on the SDG&E website at <http://www.sdge.com/regulatory-notice>.

SDG&E’s application and related exhibits may also be inspected at the CPUC Office located at 505 Van Ness Avenue, San Francisco, CA 94102.

**CPUC PROCESS**

This Application will be assigned to an Administrative Law Judge (Judge) who will determine how to receive evidence and other related documents, necessary for the CPUC to establish a record upon which to base its decision. Evidentiary Hearings (EHs) may be held where parties of record will present their testimony and may be subject to cross-examination by other parties.

These EHs are open to the public, but only those who are parties of record can participate. After considering all proposals and all evidence presented during the proceeding, the assigned Judge will issue a proposed decision determining whether to adopt all or part of SDG&E's request, modify it, or deny it. The CPUC Commissioners may sponsor an alternate decision and the issue will be decided at a scheduled Commission Voting Meeting.

As a party of record, the Office of Ratepayer Advocates (ORA) will review this application. ORA is the independent consumer advocate within the CPUC with a legislative mandate to represent investor-owned utility customers to obtain the lowest possible rate for service consistent with reliable and safe service levels. ORA has a multi-disciplinary staff with expertise in economics, finance, accounting and engineering. Other parties of record will also participate in the CPUC's proceeding to consider this application. For more information about ORA, please call (415) 703-1584, e-mail [ora@cpuc.ca.gov](mailto:ora@cpuc.ca.gov) or visit ORA's website at <http://ora.ca.gov/default.aspx>.

### **STAY INFORMED**

The CPUC offers a free Subscription Service which is available on the CPUC website at [www.cpuc.ca.gov](http://www.cpuc.ca.gov) which allows you to follow this proceeding. If you would like to learn how you can participate in the proceeding, or if you have informal comments or questions about the CPUC process, you may contact the CPUC's Public Advisor's Office (PAO) at the address noted below. When writing, please reference proceeding A.14-12-XXX. All written correspondence and emails are available for the Commissioners and the assigned Judge for this proceeding to review.

Write: CPUC Public Advisor's Office  
505 Van Ness Avenue  
San Francisco, CA 94102

Email: [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov) Phone: 866-849-8390 TTY: 1-866-836-7825