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01/17/19
04:59 PM

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

Application of Pacific Gas and Electric Company
for Authority, Among Other Things, to Increase
Rates and Charges for Electric and Gas Service
Effective on January 1, 2020. (U39M)

Application 18-12-009

RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO TEST
YEAR 2020 GENERAL RATE CASE APPLICATION OF PACIFIC GAS AND
ELECTRIC COMPANY

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Dated: **January 17, 2019**

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I.

INTRODUCTION

Pursuant to Rule 2.6 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure (Rules), Southern California Edison Company (SCE) respectfully files this response to the application of Pacific Gas and Electric Company (PG&E) for a 2020 General Rate Case (GRC).

II.

DISCUSSION

Rule 1.4 states that a person may become a party to a proceeding by, among other methods, filing a protest or response to an application. Via this response to PG&E's application for a 2020 GRC, SCE asks for party status in the proceeding.

Responses to applications are governed by Rule 2.6. Rule 2.6(a) states:

Unless otherwise provided by rule, decision, or General Order, a protest or response must be filed within 30 days of the date the notice of the filing of the application first appears in the Daily Calendar.

Notice of the filing of this application first appeared on the Commission's Daily Calendar on December 18, 2018. Accordingly, this response is timely filed.

Rule 2.6(c) states:

Any person may file a response that does not object to the authority sought in an application, but nevertheless presents information that the person tendering the response believes would be useful to the Commission in acting on the application.

SCE has actively participated in numerous prior PG&E GRCs by submitting rebuttal testimony, briefs, and comments on proposed decisions. In prior PG&E GRCs to which SCE was a party, the legal and factual contentions SCE made were based on the positions taken by other intervenors. At this early juncture in the proceeding, SCE has not identified any specific issues regarding PG&E's application.

SCE notes that issues surrounding cost recovery for activities and efforts to address wildfire risks are of common interest (and are of crucial importance) to both SCE and PG&E. In addition, SCE has recently filed its Risk Assessment Mitigation Phase (RAMP) showing,¹ and in 2019 SCE will be preparing and filing its own risk-informed GRC application. Thus, issues raised in PG&E's GRC risk showing, such as utilizing risk quantification to justify cost recovery requests, are of common interest to SCE and PG&E. This is particularly true because RAMP is an evolving process for all three large electric investor-owned utilities; each utility's RAMP showing to an extent builds off of the other utilities' most recent RAMP showings.

Based on its experience with prior PG&E GRCs, SCE expects to submit rebuttal testimony or briefs on issues raised by other intervenors. Thus, SCE believes it will be able to present information that would be useful to the Commission in acting on the application.

Finally, Rule 2.6(d) states:

Any person protesting or responding to an application shall state in the protest or response any comments or objections regarding the applicant's statement on the proposed category, need for hearing, issues to be considered, and proposed

¹ See I.18-11-006.

schedule. Any alternative proposed schedule shall be consistent with the proposed category, including a deadline for resolving the proceeding within 12 months or less (adjudicatory proceeding) or 18 months or less (ratesetting or quasi-legislative proceeding).

SCE has no comments or objections regarding PG&E's proposed category, need for hearings, issues to be considered, or proposed schedule, and is not proposing any alternative schedule.

III.

CONCLUSION

By virtue of this response, pursuant to Rule 1.4, SCE asks to become a party to this proceeding.

Respectfully submitted,

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