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Decision 82 09 111 SEP 22 1982

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of
SOUTHERN CALIFORNIA EDISON COMPANY
for authority to establish a Major
Additions Adjustment Billing Factor
and an Annual Major Additions Rate
to recover the costs of owning,
operating, and maintaining San
Onofre Nuclear Generating Station
Unit No. 2, and to adjust downward
net Energy Cost Adjustment Clause
rates to equal the increase in Major
Additions Adjustment Clause rates.

Application 82-02-40

In the Matter of the Application
of San Diego Gas & Electric Company
to add a Major Additions Adjustment
Clause (MAAC) to its electric
tariffs, to adjust its electric
rates in accordance therewith upon
operating Station Unit 2, and to
modify its Energy Cost Adjustment
Clause (ECAC) rates.

Application 82-03-62

ORDER MODIFYING ALJ'S RULING
OF JUNE 14, 1982, AND
DENYING REHEARING

On June 14, 1982, Administrative Law Judge (ALJ) Tomita issued a Ruling in this proceeding which, among other things, denied the request of Southern California Edison Company (Edison) that August 15, 1982 be set as the commercial operating date for San Onofre Nuclear Generating Station Unit No. 2 (SONGS 2) and adopted the recommendation of the Commission staff that the commercial operating date be the date of the successful

completion of all initial start-up tests and the warranty run.
That ruling is attached hereto as Appendix A.

Edison filed a request that the ALJ Ruling be rescinded. At our conference of July 21, 1982, we discussed Edison's request and ratified the ALJ Ruling by means of a Minute Order as follows:

"Minute Order

Commissioner Grew proposed that the Commission ratify, by Minute Order, Administrative Law Judge (ALJ) Tomita's ruling of June 14, 1982 which rescheduled hearings after finding the commercial operating date was not August 15, 1982. This issue relates to consolidated Applications 82-02-40 and 82-03-63, Southern California Edison Company and San Diego Gas & Electric Company, respectively. Commissioners Gravelle, Calvo, and Grew voted to ratify ALJ Tomita's ruling, denying Southern California Edison Company's petition filed June 18, 1982. President Bryson dissented. Commissioner Grimes was necessarily absent and did not participate."

By this action we, in effect, adopted the ruling as our decision.

On August 2, 1982, Edison filed an application for rehearing of the ALJ Ruling as ratified by the Minute Order.

We have carefully considered each and every allegation of error in Edison's application and are of the opinion that good cause for granting rehearing has not been shown. However, upon review of the issues raised by Edison, it is apparent that the effect of our ratification of the ALJ's Ruling was to decide a substantive issue in this proceeding, namely the criteria for setting a commercial operating date for SONGS 2. Therefore, the Ruling should include separately stated findings of fact and conclusions of law on all material issues as required by Section 1705 of the Public Utilities Code. The existing record in this

proceeding is sufficient to support such findings and conclusions and by this order we provide them.

Furthermore, we do not find persuasive Edison's allegations and arguments that the criteria for setting a commercial operating date for SONGS 2, which we adopted by ratifying the ALJ's ruling, are erroneous. For all the reasons stated in the ALJ's ruling, we are convinced that the ratepayers' interest in not bearing any risk of a delay in full operation of SONGS 2 fully supports our decision.

We do, however, concur with Edison on one point. The staff's recommendation as to what action should be taken in the event Edison is not able to meet the adopted criteria is reasonable. Therefore, to the extent that Edison is unable to meet any of these criteria because of Nuclear Regulatory Commission requirements or other technical restraints, Edison has the burden of demonstrating to this Commission why an exception to meeting such criteria should be granted.

No other issues need be discussed. Therefore,

IT IS ORDERED that,

1. The ALJ's Ruling of June 14, 1982, as ratified by our Minute Order on July 21, 1982, is modified to add the following Findings of Fact and Conclusion of Law:

Findings of Fact

1. Edison and San Diego Gas & Electric Co. are the principal owners of SONGS 2.
2. The Uniform System of Accounts provides no criteria or definition for determining the commercial operating date of a new plant facility.
3. There are no regulatory requirements to support Edison's proposed commercial

operating date of August 15, 1982 or its alternate proposal that the commercial operating date be no later than 120-days after initial synchronization of SONGS 2.

4. The criteria set forth by Edison for determining a commercial operating date are unreasonable.

5. The recommended criteria for determining a commercial operating date which require the successful completion of all start-up testing programs and completion of the warranty run are reasonable.

6. Only after the successful completion of the testing run at various power plateaus and the warranty run can the ratepayers be reasonably assured that mechanical or system related defects which might impair the full use of SONGS 2 will be uncovered.

7. Based on the information currently available, the criteria set forth by the staff could conceivably be met on approximately February 21, 1983, or even as early as January 2, 1983, if none of the 51 days scheduled for maintenance shut down are necessary, or some other later date if corrective maintenance should exceed the 51 days scheduled, or if the full power license is not received in time to complete all of the planned and/or required tests, including the warranty run.

8. It is reasonable to cancel the hearings scheduled for June 17, 1982 and schedule a prehearing conference for 10 a.m. on

[Handwritten signature]
X-11

Concur and dissent:

I concur with much of the order but
dissent on the narrow ground

that to require that the warranty test

be run prior to the ~~test~~ "commercial results

data" will create a disincentive to aggressive

bargaining by utilities for the most

complete supplier warranties.

Tuesday, October 12, 1982, in the Commission's Courtroom, State Building, 350 McAllister Street, San Francisco, at which time we should be better able to determine the need for further scheduling and for phasing of the proceeding.

Conclusion of Law

1. Edison's proposed commercial operating date of August 15, 1982 or its alternate proposal of a commercial operating date to be set at a time no later than 120 days after synchronization is premature.
2. Rehearing of the ALJ's Ruling as modified herein is denied.

This order is effective today.

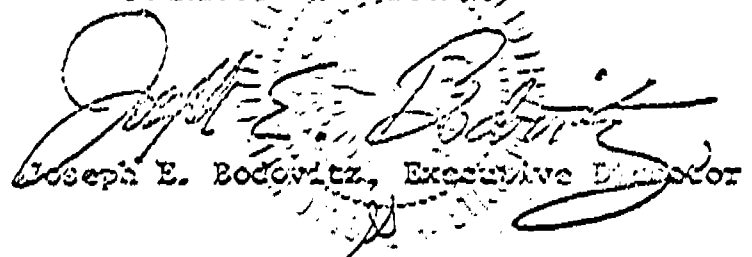
Dated SEP 22 1982, at San Francisco, California.

I concur and dissent. I concur with much of the order but dissent on the narrow ground that to require that the warranty test be run prior to the "commercial operating date" will create a disincentive to aggressive bargaining by utilities for the most complete supplier warranties.

/s/ JOHN E. BRYSON
Commissioner

JOHN E. BRYSON
President
RICHARD D. GRAVELLE
LEONARD M. CRIMES, JR.
VICTOR CALVO
PRISCILLA C. CREW
Commissioners

I CERTIFY THAT THIS DECISION
WAS APPROVED BY THE ABOVE
COMMISSIONERS TODAY.


Joseph E. Bodovitz, Executive Director

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application)
 of SOUTHERN CALIFORNIA EDISON)
 COMPANY for authority to establish)
 a Major Additions Adjustment)
 Clause, to implement a Major)
 Additions Adjustment Billing Factor)
 and an Annual Major Additions Rate)
 to recover the costs of owning,)
 operating, and maintaining San)
 Onofre Nuclear Generating Station)
 Unit No. 2, and to adjust)
 downward net Energy Cost Adjustment)
 Clause rates to equal the increase)
 in Major Additions Adjustment)
 Clause rates.)

FILED
 PUBLIC UTILITIES COMMISSION

JUL 1 1982

SAN FRANCISCO, CALIF.
 Application 82-02-40

In the Matter of the Application)
 of San Diego Gas & Electric)
 Company to add a Major Additions)
 Adjustment Clause (MAAC) to its)
 electric tariffs, to adjust its)
 electric rates in accordance)
 therewith upon operating of San)
 Onofre Nuclear Generating Station)
 Unit 2, and to modify its Energy)
 Cost Adjustment Clause (ECAC))
 rates.)

Application 82-03-63

ADMINISTRATIVE LAW JUDGE'S
RULING ON RESCHEDULING HEARINGS

At the completion of the cross-examination of Southern California Edison Company's (Edison) four witnesses and the Commission staff's (staff) three witnesses on the issue of commercial operating date for San Onofre Nuclear Generating Station Unit No. 2 (SONGS 2), the staff made a motion requesting that the Commission issue an interim order on this issue. The staff made a further

motion to suspend hearings until the Commission issued its interim order. The staff motion for an interim order was supported by Edison as well as San Diego Gas & Electric Company (SDG&E), but the staff motion to suspend hearings was opposed by Edison and SDG&E. The staff justification to suspend hearings was to avoid the necessity of phasing the hearings into a procedural phase and reasonableness of investment phase which would be necessary if the proposed August 15, 1982 operating date was adopted. If the staff-suggested commercial operating date of approximately February 1983 was adopted, the staff reasons that the present set of hearings scheduled for Phase I are premature.

The administrative law judge (ALJ) requested concurrent briefs on the issue of commercial operating date be filed by June 8, 1982 and suspended hearings on the matters be until June 17, 1982 to consider the issue. Hearings would resume on June 17, 1982 should the Commission either adopt Edison's August 15, 1982 commercial operating date or fail to address the issue. If the staff's recommended criteria for the commercial operating date is adopted, or some modification of such proposal, the June 17, 1982 hearing date would be used as a prehearing conference to schedule further hearings and/or prehearing conference dates.

After discussions with assigned Commissioner Priscilla Grew it was decided that an ALJ's procedural ruling would be issued on whether the presently scheduled hearings should be rescheduled. This ruling is being issued with the concurrence of Commissioner Grew. The answer to this procedural question is largely dependent on whether August 15, 1982 is the commercial operating date.

Concurrent briefs were filed by Edison, PG&E, City of San Diego, Toward Utility Rate Normalization (TURN), California Manufacturers Association (CMA), and the staff. We are now ready for ruling.

The Issue

The issue to be resolved at this time is whether the commercial operating date for SONGS 2 should be August 15, 1982 as proposed by Edison or a date after successful completion of the 100% power testing phase including the warranty run as recommended by the staff. According to Edison's power ascension schedule, Edison anticipates that this will occur around the end of February 1983.

While SDG&E is a 20% owner of SONGS 2, it relies upon and supports Edison's position on this issue. The ruling on this issue applies equally to SDG&E.

Edison's Position

Edison in its brief identifies the issues on commercial operating date as follows:

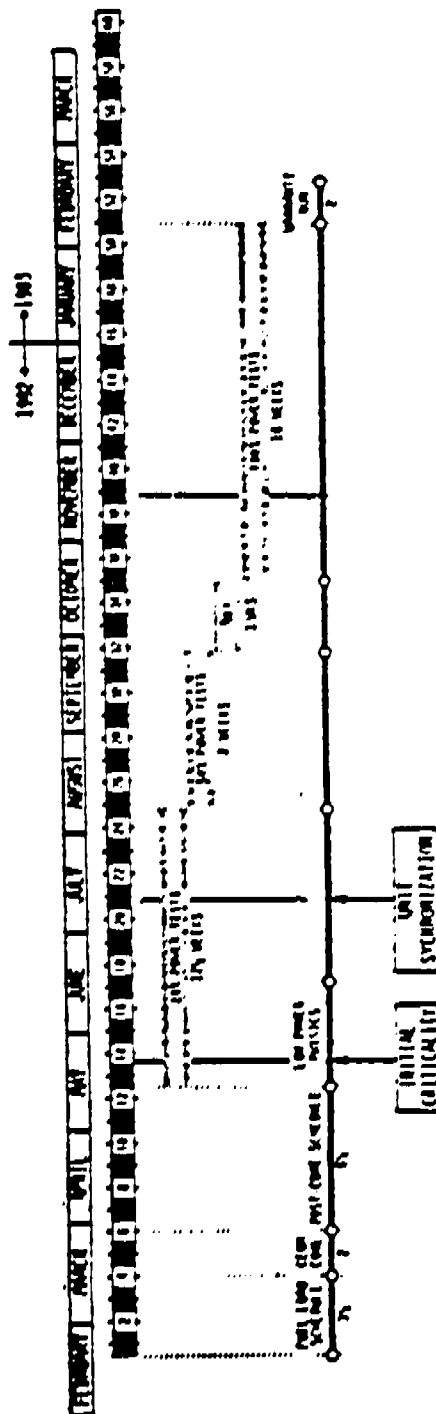
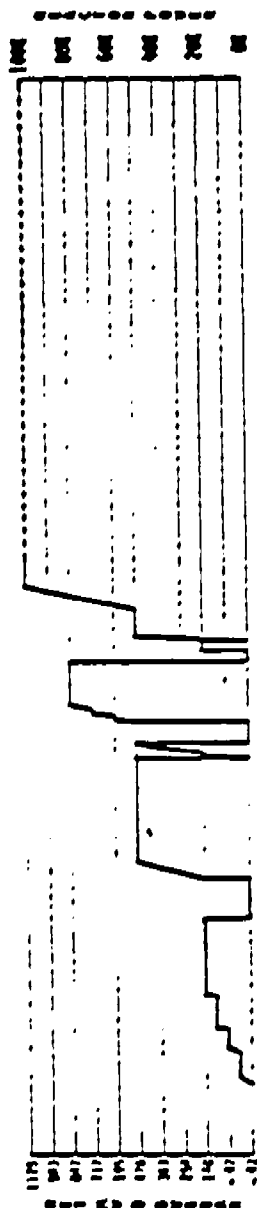
- A. To what extent will all Nuclear Regulatory Commission (NRC) requirements for continuous operation at any power level (20, 50, 80, or 100%) have been met on completion of testing at a given power level?
- B. Is the power ascension schedule proposed by Edison reasonable?
 1. What is the impact of the 51 days of contingency related to corrective maintenance on the power ascension schedule?
 2. How do the work-around activities provide power ascension schedule flexibility?
 3. To what extent, if any, are power ascension schedule delays at TMI-2 and Prairie Island 1 & 2 relevant to the Units 2 & 3 power ascension schedules?
- C. What is the relationship between terminating Allowance for Funds Used During Construction (AFUDC) on Units 2 & 3 and adding the Units 2 & 3 investment to rate base and reflecting it in rates?
- D. What is the impact of federal income tax requirements on adding the Units 2 & 3 investment to rate base and reflecting it in rates?

- E. What legal precedent exists for determining when plant is "used or useful"?
- F. At what point in time should a unit no longer be considered to be construction work in progress?
- G. What is the relationship between the 200-hour warranty run and the test program for Units 2 & 3?
- H. Is staff criteria 2, which requires 48 hours continuous operation at rated capacity following the bearing and turbine inspection, valid?

Edison's policy witness David J. Fogarty, executive vice president, testified that the Commission should adopt August 15, 1982 as the commercial operating date of SONGS 2 since the unit would be expected to be at the 50% power stage. At such time Fogarty reasoned that the plant was used and useful. He further testified that even if SONGS 2 was in the 20% power stage, an argument could be made that the plant was used and useful if a significant number of tests at 20% power had been completed such that the system dispatcher could use the unit to carry the system load.

Dwight E. Nunn, project manager for SONGS 2 and 3, testified on the power ascension schedule for SONGS 2 (Table 1). He stated that although Edison was currently about two weeks behind the schedule shown in the lower graph of Table 1, this would not cause a delay in meeting the August 15, 1982 commercial operating date because it would be possible to work around certain of the tests and therefore not lose any time. Nunn further testified that although the schedule contains 51 days of downtime for maintenance, these are discretionary and may not take place unless actually required. Synchronization of SONGS 2 is scheduled to occur in July 1982 at which time generated power from SONGS 2 will be available to the Edison system.

SONGS UNIT 2 POWER ASCENSION SCHEDULE



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Gabriel A. Chavez, project start-up manager for SONGS 2 and 3, testified on the various extensive and comprehensive testing which have been accomplished and/or are required on SONGS 2. The start-up testing commenced in February 1978 and over the past four years SONGS 2 has undergone testing of nearly 30,000 individual system components and 500 comprehensive system tests. Included in the start-up test programs are:

1. Prerequisite tests:
 - a. Construction completion phase.
 - b. Prerequisite test phase consisting of electrical and mechanical tests.
2. Preoperational and acceptance tests phase.
3. Precritical tests.
4. Initial criticality andd low-power physics testing.
5. Power ascension tests.

Chavez also testified that by August 15, 1982 SONGS 2 will be 90% through the testing program.

Chavez also testified that although coal plants are far more complex than oil/gas plants, the durations and formalization of the start-up programs are similar. This is not true for a nuclear plant which is four or five times as complex as coal plants and which require more regulated and documented tests to confirm results and provide traceability.

Larry O. Chubb, valuation supervisor for the rate base - depreciation division of the valuation department, was the final Edison witness. He testified on the appropriateness of the August 15, 1982 commercial operating date from an accounting and income tax viewpoint. He stated that the August 15, 1982 date would be consistent with Federal Energy Regulatory Commission (FERC) policy as set forth in Electric Plant Instruction 9D of the Uniform System of accounts (USOA) which states:

"The equipment accounts shall include the necessary costs of testing or running a plant or parts thereof during an experimental or test period prior to such plant becoming ready for or placed in service. The utility shall furnish the Commission with full particulars of and justification for any test or experimental run beyond a period of 120 days for nuclear plants, and a period of 90 days for all other plants. Such particulars shall include a detailed operational and downtime log showing days of production, gross kilowatts generated by hourly increments, types, and periods of outages by hours with explanation thereof, beginning with the first day the equipment was either tested or synchronized on the line to the end of the test period." (18 CFR § 101, USOA, Electric Plant Instruction 9D (1981).)

The August 15, 1982 operating date chosen by Edison would fall within the 120-day period specified in the USOA.

Witness Chubb further testified that the August 15, 1982 date would also be consistent with the criteria used for determining the proper date to begin federal and state tax depreciation. The witness stated that Edison was relying on § 168 of the Internal Revenue Code and Treasury Regulation 1.43.3 and to Revenue Rulings 76-428 and 79-98.

Edison in its brief also suggests the adoption of alternate criteria should the Commission not adopt Edison's proposed criteria for commercial operating date. The alternate proposal would require that the commercial operating date be set at a point no later than 120 days after initial synchronization of SONGS 2. Under the alternate proposal the following criteria would have to be met:

- A. The unit has been initially synchronized to the electric system, and the system dispatcher has control over the unit.
- B. All testing at the 50% power level has been completed and the unit is operating at the 80% power level.

- C. As a result of operation at the 80% power level, over 600 MW of capacity and associated energy are available to the system.
- D. To the extent that Edison is unable to meet any of the above three criteria because of NRC requirements and/or technical constraints, Edison has the burden of demonstrating to the Commission why an exception to meeting such criteria should be granted.

Edison argues that the alternate proposal would avoid a situation where the FERC and the Commission's accounting for AFUDC may differ. Edison states that considering a delay of nine days due to a random failure of seals in a reactor coolant pump, the application of the alternate criteria would result in a date of November 8, 1982.

Staff Position

The staff sees the issue in this proceeding as a policy decision as to when the risk of plant operation and failure should be transferred from the stockholders to the ratepayers. The staff offered Principal Financial Examiner Kenneth K. Chew, Associate Utilities Engineer Sarvjit S. Randhawa, and Senior Utilities Engineer Kevin P. Coughlan as its witnesses on the commercial operating date issue.

Chew testified that the USOA provided no criteria or definition for determining the commercial operating date of a new plant facility. He further testified that the USOA allows for accrual of AFUDC until such construction work is included in utility plant in service. Chew further stated that the 120-day period cited by Edison's witness Chubb was nothing more than a reporting requirement time period after which more specific information regarding testing must be provided regulatory agencies.

Randhawa testified about the testing requirements and procedures which nuclear plants must undergo. Upon receipt of the full power license, the nuclear generating station is brought to higher power levels in steps and only gradually over a period of

months. For SONGS 2 the power plateaus are scheduled at 20%, 50%, 80%, and 100% reactor power. The witness testified that the purpose of the testing program at each power plateau is to assure that the structures, components, and systems of the plant operate and respond in a manner that provides reasonable assurance that the facility can be operated with a high degree of reliability and without undue risk to the health and safety of the public before proceeding to the next power plateau. Randhawa considers the plant to be in a testing phase during the entire power ascension schedule and that synchronization of the plant and the delivery of power to the utility grid should not be determinative of the commercial operating date. In Randhawa's opinion power plant testing is complete only after completion of the start-up testing program and after the warranty run has been satisfied.

Coughlan, the final staff witness, proposed certain criteria that should be used to determine the date of commercial operation for a nuclear power plant. He testified that the policy reasons for excluding SONGS 2 from rate base will no longer apply when the plant can provide continuous reliable service in accordance with design. Thus the transfer of plant from construction work in progress into rate base should reasonably occur only after all of the initial start-up testing has been successfully completed as described by Randhawa.

Position of Other Parties

TURN argues that the commercial operating date for SONGS 2 should meet the standards set forth in a PG&E contract with Sacramento Municipal Utility District for sale of power produced at the Rancho Seco Nuclear Generating Station. TURN states in its brief that such standards would be met after the completion of the warranty run on SONGS 2, assuming that the requirement of a preliminary operating period is met by the various tests now planned to occur during the SONGS 2 power ascension schedule.

CMA comments in its brief that the acceptance of an August 15, 1982 commercial operating date for SONGS 2 places an unacceptable risk on the ratepayers. The City of San Diego concludes that SONGS 2 should be classified as CWIP and accrue AFUDC until it has completed all its tests and achieved a 100% power level. PG&E did not take a position on the commercial operating date for SONGS 2.

Discussion

Based on the evidence in the record, it is obvious that there is no accounting requirement, regulatory requirement, or other event which requires the commercial operating date for SONGS 2 to be August 15, 1982. We can understand Edison's and SDG&E's reasons for urging an early commercial operating date in order to convert the noncash AFUDC earnings into cash earnings and to commence accruing depreciation expenses which further improves cash flow. We can also see that at 50% power and the subsequent acceleration to 80% and 100% power, SONGS 2 could provide ratepayers with substantial additional energy, provided the tests all prove to be successful and confirm the reliability of the unit.

While Edison's witnesses have testified they can foresee no incident that would result in a delay or successful completion of the plant testing, we are also aware that nuclear power plants have been subject to delay or taken out of operation during the testing phase and even after the testing phase for a variety of reasons. Edison argues that the delays at Three Mile Island (TMI) Unit 2 and Prairie Island Units 1 & 2 mentioned by staff witness Coughlan are not relevant because of the differences between these plants and SONGS 2 and also because of the differences in the scope and number of tests which were not considered by the staff witness. Coughlan testified that the purpose of his additional testimony and exhibits relating to TMI Unit 2 and Prairie Island Units 1 & 2 was to illustrate that problems can occur at nuclear power plants after unit synchronization. It was not offered for the purpose of making a

technical analysis of the plants in question, or their power ascension schedules nor to make a prediction about the probabilities of test failures. We are also cognizant of the fact that testing of nuclear power plants is constantly changing and that Edison's testing programs have been developed to overcome the various problems which have resulted in delays or shutdowns in other nuclear power plants. However, staff's argument that it is clearly foreseeable that problems may occur during the testing phase is supported by the record of facilities such as TMI and Prairie Island. It is not necessary for this ALJ or the Commission to guess whether or not Edison has successfully lowered the risk of additional delays. It is sufficient to conclude that the ratepayers need not bear any risk of delay of the full operation of this facility.

The staff's recommendation that SONGS 2 not be considered in commercial operation until all start-up testing has been completed protects ratepayers if the plant were to be shut down during the test phase. The staff believes that only after completion of all the tests will the ratepayers be reasonably assured that the plant is capable of producing power of design output. Once the plant is included in rate base and should the tests subsequently reveal that modifications are necessary, the testing may possibly be extended over many months. Ratepayers would then be bearing the full cost of the plant without receiving commensurate benefits.

Edison also argues that its proposed commercial operating date of August 15, 1982 is reasonable since it believes that the five policy reasons set forth by the staff justifying exclusion of CWIP from rate base will no longer apply at such time. At 50% power Edison considers SONGS 2 as used and useful since:

- A. It will be contributing 355 MWs of capacity and more than 260 million kWhs per month of energy to the Edison system.
- B. The construction is complete and the plant was turned over to Edison by Bechtel Power Corporation.

- C. The present ratepayers will receive a substantial benefit from SONGS 2 especially if prerelease power is valued at nuclear fuel costs.
- D. There is justification to stop AFUDC at 50% power and transfer project costs to ratepayers, and finally,
- E. It is reasonable for ratepayers to bear the risk associated with SONGS 2 since they will be receiving substantial benefits from the plant.

It is obvious that the staff and Edison both agree that generation of power alone is not sufficient in determining commercial operations and that reliability of such generation is essential. The difference between the positions of the staff and Edison is when to consider the plant to be providing reliable energy. Is it after 50% power testing or is it after successful completion of all testing and the warranty run?

The record provides ample indication that the purpose of tests is to uncover mechanical or system-related defects which might impair the full use of the facility. Indeed, the 200 hour warranty tests are required by both Edison and its vendors to assure that the facility is in a finished state. The Commission has already indicated that Edison will receive recovery for the SONGS 2 power it provides to its customer during the test phase. Edison has failed to demonstrate why the ratepayers should also assume the risk (regardless of its magnitude) that the tests will uncover delay-producing defects in the facility. The staff's conclusions on the commercial operating date is reasonable. Edison's proposal or alternate proposal for the commercial operating date imposes unnecessary risks on the ratepayers.

Ruling

It is therefore ruled that the commercial operating date for SONGS 2 is when all of the initial start-up testing, including the warranty run, has been successfully completed.

Based on the information currently available SONGS 2 could conceivably meet the above criteria on approximately February 21, 1983, or even as early as January 2, 1983 if none of the 51 days scheduled for maintenance shut down are necessary, or some other later date if corrective maintenance should exceed the 51 days scheduled, or if the full power license is not received in time to complete all of the planned and/or required tests including the warranty run. It is therefore further ruled that the hearing scheduled for June 17, 1982 is canceled and a prehearing conference is scheduled for 10 a.m. on Tuesday, October 12, 1982, in the Commission's Courtroom, State Building, 350 McAllister Street, San Francisco, at which time we should be better able to determine the need for further scheduling and for phasing of the proceeding.

Dated June 14, 1982, at San Francisco, California.



Kenji Tomita
Administrative Law Judge

CERTIFICATE OF SERVICE

I certify that I have by mail this day served a true copy of the original attached Administrative Law Judge's Ruling on Rescheduling Hearings on all parties of record in these proceedings or their attorneys of record.

Dated June 14, 1982, at San Francisco, California.

Katherine McCormack
Katherine McCormack

This ruling on A.82-02-40 & 82-03-63 was mailed to the following on June 14, 1982.

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