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Decision 95-11-063 November 21, 1995

ORIGINAL

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of the Southern California Edison Company for: (1) Authority to Revise its Energy Cost Adjustment Billing Factors, its Electric Revenue Adjustment Billing Factor, its Low Income Rate Assistance and its Base Rate Levels Effective January 1, 1994; (2) Authority to Revise the Energy Reliability Index and Avoided Capacity Cost Pricing; and (3) Review of the Reasonableness of Edison's Operations During the Period from April 1, 1992 Through March 31, 1993.	Application 93-05-044 (Filed May 28, 1993)

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Carol L. Matchett, Attorney at Law, for Division of Ratepayer Advocates.

O P I N I O N

Southern California Edison Company (Edison) seeks a finding that Edison's operations for the record period April 1, 1992, through March 31, 1993, were reasonable. In February 1994, the Division of Ratepayer Advocates (DRA) submitted its Reasonableness Report. In its report, DRA made three recommendations: (1) a $7.2 million disallowance related to Edison's sale of surplus fuel oil; (2) a disallowance of $5,074,785 plus interest regarding Western Systems Power Pool (WSPP) transmission loss revenues; and (3) that Edison change its method of calculating rewards or penalties for San Onofre Nuclear Generating Station (SONGS) units in future Nuclear Unit Incentive Procedure (NUIP) periods. DRA found all other areas of Edison's operations that it reviewed reasonable, but deferred the following issues for review in the 1994 record period: Energy Cost Adjustment Clause (ECAC), Electric Revenue Adjustment Mechanism (ERAM), and Low Income Ratepayer Assistance (LIRA) account audits, interutility power purchases; and gas cost issues. DRA's review of Edison Qualifying Facility (QF) issues, including review of the 1993 Edison-Metropolitan Water District contract, will be reviewed in a separate phase.

Subsequently, DRA withdrew its recommendation that Edison change its method of calculating rewards or penalties for the SONGS units and recommended that the Commission make no revision to the NUIP in this proceeding. In July 1994, Edison agreed not to contest DRA's recommendation with respect to the WSPP transmission loss revenue, and made an adjustment to the ECAC balancing account crediting the account with $7,893,000, plus interest of $363,510.31, for a total adjustment of $8,256,510.31.

Only the issue concerning the sale of surplus low sulfur fuel oil (LSFO) in 1992 remained. DRA made a disallowance recommendation of $4,495,389. Prior to hearing DRA withdrew its testimony on this issue and no longer contested the reasonableness of the LSFO sales that occurred during the record period.

Edison requests: (1) that its operation and expenses during the record period, except for the issues deferred to the next record period and the QF phase of this application, be found reasonable by the Commission; (2) that the Commission adopt Edison's calculation of the NUIP reward for SONGS 1, Fuel Cycle 11 in the amount of $1,034,526; and (3) that the proposed Findings of Fact, Conclusions of Law, and Ordering Paragraphs contained in Appendix A to its brief be adopted by the Commission.

Edison asserts that with the withdrawal of DRA's testimony on the 1992 LSFO sales, and Edison's adjustment in July 1994 crediting the ECAC balancing account for the WSPP transmission loss revenues, there is no evidence in the record that challenges the reasonableness of Edison's operations or expenses during the record period. All parties to this application had ample opportunity to review Edison's testimony on the reasonableness of its operations and file testimony on any issue that the party believed should be found unreasonable. When hearings finally occurred almost two years after Edison's May 1993 filing, no party, including DRA, contested the reasonableness of Edison's operations.

Edison contends that with the withdrawal of DRA's testimony on the LSFO sales, there is no evidence in the record that contradicts Edison's testimony on this sale. Edison's evidence shows that Edison hired a consultant to recommend an oil disposition plan. Its consultant, Stanford Research International, recommended in December 1991 that "If SCE cannot sell all of the surplus oil at reasonable prices, then SCE should hold the surplus [oil] and attempt another sale in the winter of 1992-93." Edison did follow the recommendation of its consultant and sold the surplus oil at reasonable prices by realizing an average net revenue of $2.00 per barrel more than the net revenue that was expected if Edison held the oil and sold it during the forecasted 1992/93 winter peak. The record thus demonstrates that Edison acted in the best interests of the ratepayers in the sale of its 2.1 million barrels of LSFO from excess inventory at an average price of $14.05 per barrel. Therefore, the 1992 LSFO sales should be found reasonable.

Edison and DRA disagree on proposed findings and conclusions. The disagreement arose because in several areas of Edison's operations, DRA did not make a recommendation nor did it defer its review of that area. For example, where DRA stated it had no objections to Edison's operations such as hydroelectric resources and Special Contracts, Edison believes those areas of Edison's operations should be found reasonable. There were also several areas of Edison's operations where DRA's testimony was silent but did not defer its review of those issues (e.g., Edison's gas and oil generation and plant operations, energy resources, Women, Minority, and Disabled Veterans Business Enterprise (WMDVBE) Memorandum Account, and Regional Recovery Programs). Edison believes it has demonstrated the reasonableness of its expenses and operations and is entitled to findings that those expenses and operations were reasonable during the record period.

<u>Nuclear Operations Expense and NUIP Reward</u>

DRA found Edison's operation of its nuclear units reasonable during the record period and found the Incentive Period reward (as originally calculated by Edison) of $938,565 earned by Edison for the operation of SONGS Unit 1 to be reasonable as well. DRA recommends that Edison refrain, to the extent practical, from entering into any more long-term fuel contracts that result in the obligatory taking of fuel at the inflated prices experienced in this record period. However, DRA recommends no specific change to the NUIP methodology at this time.

DRA contests an issue first raised by Edison in its rebuttal testimony. In that testimony, Edison recalculated its NUIP reward upward to $1,034,526 for the performance of SONGS Unit 1, Fuel Cycle 11. DRA asserts that Edison takes the findings of Decision (D.) 94-03-039 that some operations of SONGS Unit 1 were <u>unreasonable</u> to be a basis for <u>increasing</u> its reward payment.

Edison states that as a result of the Commission's findings in D.94-03-039, which found a 5.3 day outage (127 hours) at SONGS 1 in October 1991 unreasonable, it recalculated its NUIP reward for SONGS Unit 1, Fuel Cycle 11, in conformity with Section G.10(3) of its Preliminary Statement. Edison asserts that when the average gross capacity factor is adjusted by removing the 127 hours of operations found unreasonable to reflect the performance of each Unit found to be reasonable, the NUIP reward is $1,034,526 instead of $938,565. Edison argues that if shareholders receive a reduced reward for unreasonable operations, they would have been penalized twice. Thus, Edison reasons, the NUIP reward of $938,565 that DRA had agreed to should be increased approximately 14%, to $1,034,526 as a result of the Commission's having found some of Edison's operations at the plant unreasonable. DRA claims that Edison's proposal would improperly reward shareholders for unreasonable acts, and Edison's recalculation should not be permitted.

Edison claims that DRA disregards the fact that it specifically agreed to the modification to the NUIP calculation that it is now complaining about. In Edison's ECAC Application (A.) 91-05-050, Edison and DRA executed a joint recommendation on nuclear issues that, among other things, resolved certain issues relating to the NUIP and recommended certain modifications to the NUIP including an agreement that the determination of NUIP rewards and penalties should only include the nuclear energy costs associated with the reasonable operation of the units.

D.92-06-059, the Commission found the joint recommendation on nuclear issues reasonable and adopted it. (D.92-06-059, Ordering Paragraph 45, p. 39, mimeo.) That decision also recognized that consistent with the joint recommendation, NUIP penalties for Palo Verde Units 1 and 2 that were calculated by the parties in A.90-06-001 and A.91-05-050 might have to be recalculated if any portion of the outages are found to be unreasonable. DRA acknowledged this fact in a motion to consolidate the ECAC A.90-06-001 and A.91-05-050 review of the Palo Verde Units 1 and 2 outages with the review of these same outages in Investigation (I.) 89-12-025 and agreed that there would be overlap in refunds/disallowance based on replacement power costs or base rates between the I.89-12-025 and ECAC (D.92-06-059, pp. 20-21, mimeo). The Commission indicated that the "rewards/penalties agreed upon in these applications should be imposed but may be modified for any changes [findings of unreasonable outages] in I.89-12-025." (Id.)

<u>**Discussion**</u>

Edison's argument is not persuasive. The chronology of pertinent events in this dispute provides the facts, and Edison's tariff provides the formula for calculating the reward. The facts and formula do not coalesce into an increased reward.

The SONGS 1 Fuel Cycle 11 period of operation (Incentive Period) was February 6, 1991 through November 30, 1992. On October 17, 1991 an outage occurred which resulted in a disallowance of $1,202,000 (D.94-03-039). This disallowance was an issue in A.92-05-047, which reviewed the reasonableness of Edison's operations during the period April 1, 1991 through March 31, 1992. However, the reward or penalty for the complete operation of SONGS 1, Cycle 11 could only be computed after the cycle ended on

November 30, 1992. That computation resulted in a reward of $938,565 and was set forth in Edison's prepared testimony accompanying this application submitted in May 1993. At that time the reasonableness decision in A.92-05-047 had not been issued; the $1,202,000 disallowance was announced in March 1994 (D.94-03-039). Edison, in June 1994, amended its testimony on its nuclear reward to exclude the hours found unreasonable in its calculation. Edison asserts that when those hours are excluded from the formula, the reward is increased by $95,961, from $938,565 to $1,034,526.

The disallowance arose because SONGS 1 was out of operation for 127 hours (5.3 days) starting October 17, 1991, due to negligence on the part of Edison. (D.94-03-039, finding 33.) The disallowance was the cost of replacement power above the cost of nuclear generation had there been no negligent operations. In the equation used to calculate the nuclear reward the hours of reasonable operation are in the denominator.[1] The only difference between Edison's May 1993 testimony and its amended June 1994 testimony on this issue is that Edison removed 127 hours from the denominator. This automatically increased the percentage on which the reward is based.

The pertinent tariff provision are found in Edison's Preliminary Statement Sec. G, para. 10.

> "b. The Nuclear Unit Incentive Procedure is applied by use of a formula that converts an

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[1] Average Gross Capacity Factor = $\dfrac{\text{Generation}}{(\text{Period Hrs.})(\text{Capacity})}$

> Incentive Period Average Gross Capacity Factor to dollars of reward or penalty. The amount of reward or penalty is based upon: (1) the difference in cost between producing energy from nuclear-fueled generation and the energy expense associated with replacement energy resources; and (2) the deviation in Unit performance outside the Gross Capacity Factor Range."
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> * * *
>
> "(3) **Average Gross Capacity Factor**
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> The Average Gross Capacity Factor for the Company's share of ownership of each SONGS Unit and each PVNGS (Palo Verde Nuclear Generating Station) Unit specified herein shall be the Incentive Period Average Gross Capacity Factor based on Edison's share of each Unit's maximum gross capacity shown below, computed from the most recent Incentive Period recorded data adjusted: (a) to provide for Economic Modifiers; and (b) to reflect the performance of each Unit found to be reasonable as determined by the Commission in the Annual Review of Reasonableness."
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> * * *
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> "(6) **Economic Modifiers:**
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> Economic Modifiers shall be adjustments made to the Incentive Period Gross Capacity Factor to compensate for the effect of certain conditions that affect the performance of the Unit; such conditions cause reductions in Unit performance for the purpose of minimizing the overall cost to the ratepayer, consistent with maintaining the integrity of the electrical system. The application of Economic Modifiers may remove or reduce a Nuclear Unit Incentive Procedure penalty, or

cause or increase a Nuclear Unit Incentive Procedure reward and shall be subject to Commission review on a case by case basis during the appropriate ECAC proceedings.

*In accordance with D.84-12-060, D.86-10-023, D.87-08-023, D.88-07-021, and D.91-05-054 the following four Economic Modifiers are authorized:

*(a) An Economic Modifier which permits the Company to reduce output from any SONGS Unit or PVNGS Unit or combination of units during those intervals when to do so produces an energy supply to meet system demands which is less costly to ratepayers. This Economic Modifier will accommodate additional economic power purchases.

*(b) An Economic Modifier which permits a change to a refueling outage scheduled for any SONGS Unit or PVNGS Unit or combination of units when in the best interest of ratepayers.

An Economic Modifier which permits a refueling outage schedule change to meet the system reliability needs of one or more SONGS parties other than Edison.

*d) An Economic Modifier which permits the Company to reduce output from any SONGS Unit or PVNGS Unit when the Nuclear Regulatory Commission (NRC) requires such a reduction or outage for any SONGS Unit or PVNGS Unit or combination of Units.

*d. Report on the Nuclear Unit Incentive Procedure. In conjunction with the Annual Review of Reasonableness, the Company shall report on the operation of each SONGS Unit

> and each PVNGS Unit specified herein for the Incentive Period. Such report shall be made in the Annual Review of Reasonableness whenever an Incentive Period ends within the Record Period. Such report shall set forth the Average Gross Capacity Factor for the Company's share of ownership of the Unit for the Incentive Period. Should the Average Gross Capacity Factor fall outside the Gross Capacity Factor Range, the Company shall calculate the amount of reward or penalty according to the formula set forth in Section e. Such adjustment shall be made to the Energy Cost Adjustment Account pursuant to Commission order."

For SONGS 1 the Gross Capacity Factor Range is a lower limit of 55% and an upper limit of 75%. (Sec. G, para. 10, c(4).)

Edison errs by equating a disallowance with a penalty. A disallowance is not a penalty, especially so when applying the NIUP. A penalty is a sanction imposed; a disallowance is a finding of error, not a penalty. The distinction is illustrated in TURN v. Pacific Bell (D.93-05-062) 49 CPUC 2d 299, 303 where we ordered refunds and imposed a penalty:

> "We herein order Pacific to notify customers fully of its unlawful practices and to offer all potentially affected customers a full refund, with interest. We find that Pacific still owes its customers $34.32 million in late payment charges and reconnection charges which resulted from its payment processing problems.
>
> "Due to the seriousness with which it views these violations, the Commission imposes a penalty of $15 million."

Edison's claim that by refusing to permit it to increase its reward, we are imposing a second penalty is indeed an ingenious use of language. We have not imposed any penalty in this case.

A penalty in an NUIP proceeding is defined in the tariff. It occurs when the capacity factor falls below 55%. For instance, in D.92-06-059 we found that "Palo Verde Unit 1 Fuel Cycle 2 capacity factor of 37% falls short of the required deadband capacity factor of 55% resulting in a TCF (target capacity factor) penalty for Edison of $5,340,102." (Re Southern California Edison ECAC 44 CPUC 2d 644, 661.)

The disallowance ordered in D.94-03-039 was not a penalty. It reflects the unreasonable expenses incurred to replace the lost power due to the forced outage as the result of Edison's imprudent action. The disallowance would have been made in the absence of an NUIP calculation, as we do with any Edison operation found unreasonable. Therefore, Edison is not being penalized twice if its request to recalculate the reward to reflect the unreasonable outage is not granted.

On its face, Edison's proposal is implausible. Edison claims an increased reward based on its unreasonable conduct. As DRA put it, this is an "astonishing result." (DRA Brief, p. 4.) Edison's reliance on its tariff is misplaced. It takes the phrase "to reflect the performance ... found to be reasonable" (Sec. G, para. 10.c(3)) out of context. We have set forth the pertinent tariff provisions above. The formula for deriving the gross capacity factor is the actual generation divided by the maximum gross capacity of the unit. Increasing the numerator increases the capacity factor; decreasing the denominator increases the capacity factor. In this instance Edison has chosen to decrease the denominator by the number of hours found unreasonable, thus increasing the capacity of factor and its reward. Our reading of the tariff is that the denominator of the equation (which reduces the maximum gross capacity factor) is governed by the Economic Modifiers. Those Economic Modifiers "compensate for the effect of certain conditions that affect the performance of the Unit" and are set forth in detail (see above). None permit a reduction of the maximum gross capacity factor because of negligence of Edison.

The Commission adopted the Economic Modifiers to provide adjustments to the Average Gross Capacity Factor (AGCF) to remove or reduce the penalty due to the reduced generation affected by the outages or conditions that the Commission finds reasonable as set forth in Edison's tariff. Therefore, the adjustment that Edison made in its recalculation of the reward to reflect an unreasonable outage cannot be justified. The phrase Edison relies on is applicable to the numerator of the equation. The obvious application is when Edison operates the unit above its maximum capacity for any period of time. We recognized this in D.94-03-039, where we authorized a reward for Edison based on performance in excess of the nameplate gross capacity of the unit, contrary to DRA's recommended disallowance for operating in excess of nameplate gross capacity. Although we did not refer to Sec. G, para. 10, c(3), we did find Edison's performance to be reasonable. The tariff language in para. 10(c)(3)(b) is vague. It provides no definition, detail, or example. To interpret it to reward imprudence is anomalous.

Edison has not cited us to any authority for its position. Our own research leads to the conclusion that the phrase was not inserted to reward imprudence. When discussing the need for the economic modifiers we said that "it seems clearly fair that if the utility is not responsible for the downtime, it should not be penalized if an award were otherwise due." (D.87-10-041 at p. 18; D.91-05-054 at p. 27.) As a corollary to that assessment, it seems "clearly fair" that if a utility is responsible for the downtime, it should not be rewarded.

Decreasing a penalty is a reward. In our review of decisions discussing the NUIP, we find no decision which explicitly adopted subparagraph (b) in Preliminary Statement G.10.c(3) but, as set forth above, there is explicit reference to the economic modifiers. If the outage was not caused by human error and the Commission found it reasonable, the hours of the outage would not be removed from the equation, yet the AGCF would be low. To remove unreasonable outage hours from the equation, thus increasing the AGCF and the reward, is not logical.[2] Our interpretation of subparagraph (b) is consistent with the tariff and does not lead to the absurd result of rewarding imprudence.

Reserved Issues

DRA's review of QF issues and the Metropolitan Water District contract will be addressed in a later phase of this proceeding. Review of all gas matters (including operations and

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[2] The most egregious example would be if the disallowance, instead of $1.2 million for 127 hours of outage, was only $50,000. Removing the 127 hours from the equation would increase the reward over $95,000.

expenses of oil-and-gas plants) and inter-utility power purchases, as well as audits of the ECAC, BRAM, and LIRA accounts will be consolidated with those issues in the 1994 ECAC proceeding and reviewed for two record periods: April 1992 through March 1994.

DRA concurs with Edison that the Commission should find reasonable those specific Edison operations and expenses that DRA has found are reasonable: operations and expenses of the two coal plants and the nuclear generation units. DRA requests that no findings be made in this phase of the proceeding on the issues for which DRA has reserved a later review: inter-utility contracts, all gas issues (including plant operation and expenses) and the audit of the ECAC, BRAM, and LIRA accounts. With respect to other issues, DRA makes no specific recommendation to the Commission.

Comments

Edison and DRA submitted comments to the proposed decision (PD). DRA recommended that the PD be adopted as written. Edison stated that the PD was wrong as a matter of tariff interpretation. We have reviewed Edison's comments and find them without merit. Edison, in its comments, makes arguments that are not supported by citation or by our research. For instance, it states, without citation, "Subpart (b) was specifically added to deal with disallowed outage time...." (Comments, p. 4, emphasis added.) Our research cannot confirm this. Edison's reference to D.92-06-059 (44 CPUC 2d 644) does not support that statement.

As we said above, the tariff language, Section G.10.c(3), is ambiguous. It discusses the capacity factor which is a ratio--it has a numerator and a denominator. It is a measure of the degree to which the capacity of a generating unit is being used during a certain period of time. In the electric industry the formula is:

$$\text{capacity factor} = \frac{\text{kWh of electric energy generated}}{\text{rated generating capacity (kW)} \times \text{period (in hours)}}$$

Edison claims that we ignored "the fact that Section G.10.c(3) was modified in D.92-06-059 pursuant to a joint recommendation concerning NUIP that added subpart (b) to the Preliminary Statement.". There are two things wrong with this statement. First, D.92-06-059, did not modify subpart (b) (44 CPUC 2d at 656); second, D.92-06-059, Ordering Paragraph 24, states that "the principles and methodologies underlying the ...Joint Recommendation on nuclear issues <u>shall not</u> be used as precedent in any other proceeding or litigated beyond this proceeding." (44 CPUC 2d at 667; emphasis added.) Section G.10.c(3) refers to the capacity factor being "adjusted" for certain contingencies. It does not say how the adjustment should be made. The adjustment could be to the numerator or denominator of the equation. In this instance, we believe the section refers to the numerator, not the denominator. When a tariff is ambiguous, it should be resolved in favor of the customer and against the utility. (<u>Lennox Industries v Calif. Cartage Co.</u> (1980) 4 CPUC 2d 26.) More to the point, we should not interpret a tariff to reward imprudence.

<u>Findings of Fact</u>

1. Edison's expenses and operations for its coal plants were reasonable during the record period.

2. Edison's record period nuclear fuel costs and operations at SONGS and Palo Verde Nuclear Generating Stations were reasonable.

3. No party contested Edison's administration of its Special Electric Rate Agreements during the record period.

4. Edison's administration of its Special Electric Rate Agreements during the record period was reasonable.

5. No party contested Edison's administration of its hydroelectric resources during the record period.

6. Edison's administration of its hydroelectric resources during the record period was reasonable.

7. DRA revised its initial recommendation that Edison change its method of calculating rewards or penalties for the SONGS units to a recommendation that the Commission make no revision to the NUIP in this proceeding.

8. DRA withdrew its recommendations with respect to the sale of 2.1 million barrels of surplus LSFO.

9. Edison's sale of surplus LSFO during the record period was reasonable.

10. DRA recommended a disallowance of $5,074,785 plus interest from the ECAC Balancing Account for revenues associated with transmission line losses associated with transmission service under the WSPP.

11. In July 1994, Edison agreed not to contest DRA's recommendations with respect to the WSPP line loss revenue and credited the ECAC Balancing Account with $8,256,510.31, which includes interest relating to the fuel-related component of WSPP transmission service for the period April 1, 1992 through January 1994.

12. Pursuant to Resolution E-3133 and D.92-08-042, Edison identified all costs tracked in the WMDVBB Memorandum Account.

Edison's WMDVBE Clearinghouse-related expenses incurred during the record period are uncontested and are reasonable.

13. The reasonableness of QF issues and the 1993 contract between Edison and the Metropolitan Water District will be reviewed in a later phase of this proceeding.

14. In Resolution E-3291, Edison was authorized to implement a Regional Recovery/Design for Excellence (RFDE) Program and a Regional Recovery Customer Retention (RCR) Program and demonstrate in ECAC that these programs are not being conducted in a manner that results in load-building or fuel substitution.

15. No party contested Edison's administration of the RDFE and RCR programs.

16. Neither Edison's RDFE program nor the RCR program resulted in load-building or fuel substitution during the record period.

17. DRA has reserved its review of all gas issues (including plant operations and expenses) and inter-utility power purchases and its audit of the ECAC, ERAM, and LIRA account audits to the reasonableness review of the next record period.

18. DRA's calculation of the NUIP reward for SONGS 1, Fuel Cycle 11 in the amount of $938,565 is reasonable.

Conclusions of Law

1. Except as provided for in this decision, and except for further proceedings set forth in Ordering Paragraph 3, it is concluded that Edison's energy expenses and operations for the record period were reasonable.

2. Edison's credit of $5,074,785 plus interest to its ECAC balancing account is an appropriate remedy for its unreasonable actions during the record period in double-charging for costs associated with its WSPP transmission line losses.

O R D E R

IT IS ORDERED that:

1. Southern California Edison Company (Edison) shall record in its Energy Cost Adjustment Clause (ECAC) Balancing Account a Nuclear Unit Incentive Procedure reward of $938,565 plus applicable interest for San Onofre Nuclear Generating Station Unit 1 operations during Fuel Cycle 11.

2. Edison is authorized to transfer its allocated share of Clearinghouse-related expenses totaling $222,381 for the record period, as recorded in the Women, Minority, and Disabled Veterans Business Enterprise Memorandum Account, plus associated interest, to the Electric Revenue Adjustment Mechanism (ERAM) Balancing Account on the effective date of the Commission decision in this proceeding.

3. Except as provided for in this decision, and except for further proceedings regarding the reasonableness of Edison's Qualifying Facility contracts, inter-utility power purchases, the Metropolitan Water District contract, all gas issues, including plant expenses and operations, and ECAC, ERAM, and Low Income Ratepayer Assistance account audits, this phase of the review of the reasonableness of Edison's expenses and operations during the

record period of April 1, 1992 through March 31, 1993 is concluded.

This order is effective today.

Dated November 21, 1995, at San Francisco, California.

DANIEL Wm. FESSLER
President
P. GREGORY CONLON
JESSIE J. KNIGHT, JR.
HENRY M. DUQUE
JOSIAH L. NEEPER
Commissioners