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July 19, 2011

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Subject: Rulemaking 10-05-006, Track 1  
First Set of Discovery Requests

Dear Ms. Hovsepian,

The attached questions comprise the first set of discovery requests to Southern California Edison Company (SCE) from L. Jan Reid (Reid) relative to Track I of Rulemaking 10-05-006. Please provide responses by electronic mail to [janreid@coastecon.com](mailto:janreid@coastecon.com) no later than Friday, July 29, 2011. If a response is not available in electronic form, please provide a paper copy of the response by overnight delivery to L. Jan Reid, Coast Economic Consulting, 3185 Gross Road, Santa Cruz, CA 95062.

Please contact me as soon as possible if any question is unclear or objectionable, or if SCE will be unable to respond by the requested date. Thank you for your cooperation in this matter.

Sincerely,

/s/

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First Set of Discovery Requests  
to SCE

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- Q 1. SCE states that “As California increases its reliance on intermittent and non-dispatchable resources to meet RPS and other environmental objectives, there will be a tendency for these resources to displace the energy from older fossil-fueled resources that are typically dispatchable and capable of responding to diurnal peak-to-trough variations in load and ‘firming/shaping’ in response to renewable intermittency.” (SCE Testimony, p. 28) Please provide an electronic copy of any studies that support this statement.
- Q 2. Please define the term “constraint violation” as used on page 33 of SCE’s testimony.
- Q 3. SCE states that “Consideration of electric system reliability, environmental impacts, and electricity and natural gas prices would need to be addressed in other nuclear proceedings outside of this LTPP.” (SCE Testimony, footnote 27) Notwithstanding the current Track I schedule, please explain why the above-mentioned considerations (electric system reliability, environmental impacts, electricity prices, and natural gas prices) cannot be addressed in R.10-05-006.
- Q 4. Please provide an electronic copy of any SCE studies that address the impact (including reliability) of shutting down the SONGS nuclear facility
- Q 5. SCE states that “Further, the Commission has indicated its preference to consider nuclear issues (e.g., funding of seismic studies and funding of license renewal activities) in separate proceedings focused solely on those issues.” (SCE Testimony, p. 36)
- A. Please identify the proceeding in which the Commission has indicated that it will consider the shutdown of nuclear power plants in California.
- B. Will SCE support a Commission investigation into the feasibility of shutting down nuclear power plants in California?
- Q 6. Please provide an electronic copy of any workpapers produced by SCE that support its testimony.

Q7. For the period February 1, 2011 through July 19, 2011, please provide an electronic copy of the monthly convergence bidding reports that SCE has provided to the Energy Division. (See D.10-12-034, pp. 40-42)

**Note:** I consider the above question (Q7) to be in scope because the Commission has identified procurement oversight rules as an issue in this proceeding. (See Administrative Law Judge's Ruling Denying Motion for Reconsideration and Motion Regarding Track I Schedule and Addressing Rules Track III Issues, June 10, 2011, p. 6)

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