

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

Order Instituting Rulemaking To Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.

R. 10-05-006

**FIRST DATA REQUEST  
OF THE NATURAL RESOURCES DEFENSE COUNCIL (NRDC)**

Pursuant to the procedural schedule established by the Presiding Administrative Law Judge, the Natural Resources Defense Council (NRDC) hereby serves its First Data Request upon Southern California Edison (SCE) in the proceeding referenced above. Specifically, this data request concerns the SCE's Track 1 testimony that was filed on July 1, 2011, in R. 10-05-006. NRDC requests a complete response to this data request as soon as possible or by August 3, 2011. To the extent any requests are objected to, however, NRDC requests that any and all objections be specified and the nature of those objections be fully articulated, as soon as possible.

A copy of the responses should be sent to the following:

Mr. Sierra Martinez  
NRDC  
111 Sutter Street, Floor 20  
San Francisco, CA 94104  
Telephone: (415) 475-6100  
E-mail: smartinez@nrdc.org

## **INSTRUCTIONS**

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the NRDC contact above.

Each Data Request is continuing in nature. Provide your response as it becomes available, but not later than the date noted above. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify NRDC as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

## DATA REQUESTS

The page references in the following questions all refer to the Testimony of Southern California Edison Company on Track 1 Issues, Exhibit No. SCE-1, served July 1, 2011 in this proceeding.

- 1) At page 13, in Table III-2, entitled “Load Modifiers for LA Basin (MW),” The amount of Energy Efficiency used in the “Mid Net Load” case is shown to be a negative 744 MW in 2020. At page 12, SCE states that it has modified the amount of Energy Efficiency.
  - a) Please state whether the 744 MW in 2020 is the total amount of Energy Efficiency used in this case, or if the 744 MW represents 744 MW *less than* an unmodified amount of Energy Efficiency.
    - i. If it represents 744 MW less than some unmodified amount of Energy Efficiency, please provide the unmodified amount of Energy Efficiency.
  - b) Please provide the amount of Energy efficiency that would occur in the LA Basin, under the “Mid Net Load” case, if the total amount of efficiency used were the same amount as used in the CPUC-required scenarios, which was 2,648 MW.
- 2) At page 21, in Figure III-2, entitled “LCR Need in the LA Basin Area (in MW),” there are 9 rows listed. Please specify into which row(s) Energy Efficiency is entered.
  - a) If Energy Efficiency is entered exclusively into row 7, entitled “Incremental Preferred Demand Side Management,” please explain why the values are different than the values for Energy Efficiency Table III-2 at page 13, referenced above.
- 3) At page 21, in Figure III-2, entitled “LCR Need in the LA Basin Area (in MW),” under the column entitled “Base Need”, under the subcolumn entitled “2020”, in row 6, entitled “Incremental Preferred Demand Side Management,” the amount of DSM is listed as a negative 476 MW.
  - a) Please state the total amount of incremental DSM, if any, used to modify the Peak Load in row 1, entitled “1 in 10 Peak Load (latest IEPR, split to Area).”
  - b) Please confirm or deny that the negative 476 MW of DSM is added to the amount of net qualifying capacity.
  - c) Please confirm or deny that adding a negative 476 MW of DSM results in a LCR need that is 476 MW larger.
  - d) Please confirm or deny that if the amount of DSM in row 6 were 0, the LCR need would be 476 MW smaller.