

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

Order Instituting Investigation on the
Commission's Own Motion into the Rates,
Operations, Practices, Services and Facilities
of Southern California Edison Company and
San Diego Gas and Electric Company
Associated with the San Onofre Nuclear
Generating Station Units 2 and 3.

Investigation 12-10-013
(Filed October 25, 2012)

MOTION FOR PARTY STATUS OF FRIENDS OF THE EARTH

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October 25, 2012

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Friends of the Earth (FOE) hereby moves to become a party in the above-captioned proceeding under Rules 1.4(a)(4) and (b) of the Commission's Rules of Practice and Procedure.

I. FOE'S INTEREST IN THIS PROCEEDING

FOE's interest in this proceeding is related to the Commission's expected consideration of the cost-effectiveness of the continued operation of the San Onofre Nuclear Generation Station (San Onofre), owned by Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E). FOE is a U.S. Internal Revenue Code §501(c)(3) non-profit organization that has worked for over forty years to reduce economic drivers that encourage environmental degradation from nuclear energy and address the threats to human health and the environment that nuclear power poses.

FOE and its affiliates have used, and continue to use, technical and policy expertise to combat irresponsible nuclear development in state, federal and international arenas, including Iowa, Missouri, North Carolina, various federal agencies and throughout the Pacific Rim including California. FOE's nuclear campaign works to reduce risks for people and the

environment by supporting efforts to close and defund existing nuclear reactors and fighting proposals to design and build new reactors.

Over 1,300 members of FOE live in Southern California. Many of these FOE members live in the vicinity of San Clemente, California, where San Onofre is located. These FOE members are directly impacted by the precarious status of the facility. FOE will work to protect its members and the public from, and to prevent ratepayer money from being wasted on, the outdated nuclear technologies utilized in San Onofre Units 2 and 3.

II. THE FACTUAL AND LEGAL CONTENTIONS THAT FOE INTENDS TO MAKE IN THIS PROCEEDING ARE PERTINENT TO THE ISSUES RAISED IN THE OII

FOE's technical and policy expertise regarding nuclear generation make it a valuable participant in this proceeding. The OII includes within the initial scope of the proceeding consideration of the cost-effectiveness of continued operation of San Onofre.¹ FOE will contend that the costs of maintaining San Onofre will be substantially greater than the costs of serving ratepayers with readily available alternatives. Based on the facts that FOE intends to adduce in this proceeding, the Commission will have the evidence necessary to give the owners of San Onofre a timely signal that, rather than investing large sums of capital into a plant that will, by law, require a number of additional very expensive and time-consuming system upgrades, they should, rather, use their funds to procure less expensive, more reliable and more cost-effective alternatives.

FOE's chief witness in this proceeding will be S. David Freeman, who has over 20 years of experience in senior management positions in the energy industry in California, including service as the Chief Executive Officer of the Sacramento Municipal Utility District and the Los

¹ Order Instituting Investigation, I.12-10-013, at pages 2, 4 and 13 (October 25, 2012).

Angeles Department of Water and Power, as well as service as the Trustee that helped to create the California ISO and as a senior policy advisor to Governor Davis, in which capacity Mr. Freeman was instrumental in helping to resolve the California energy crisis in 2000-2001.

Mr. Freeman will testify, supported by other experts, that the retail customers of SCE and SDG&E will benefit from a more reliable and less expensive power supply over the long term if San Onofre ceases all operation no later than 2015 or at the conclusion of its current 40-year license.

This conclusion will be supported by an identification of the billions of dollars of funds that SCE and SDG&E will be required to expend in order to maintain San Onofre in operation for the long term, as well as an identification of the overall lower costs to consumers of the alternatives to the energy that San Onofre has provided in the past. These alternatives include energy efficiency, demand response, decentralized renewable generation and electricity storage technologies.

III. SERVICE LIST

FOE respectfully requests that the Commission list Laurence G. Chaset as the FOE representative in this matter, with the following information:

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To the extent they are currently not listed on the Service List, FOE also respectfully requests that the Commission include Damon Moglen, Kendra Ulrich, S. David Freeman, Tim Lindl and Thadeus B. Culley on the Service List as information only:

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IV. CONCLUSION

The Commission should grant FOE status as a party in this proceeding with all of the rights that attach thereto.

Respectfully submitted,



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