

**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)

JOINT PARTIES' MOTION TO ADD TO SCOPING MEMO ISSUES

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National Asian American Coalition

Jorge Corralejo, Chairman and President
Latino Business Chamber of Greater LA

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November 14, 2012

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Pursuant to Rule 5.2 of the California Public Utilities Commission's ("CPUC" or "Commission") Rules of Practice and Procedure, the National Asian American Coalition, the Latino Business Chamber of Greater Los Angeles, the Ecumenical Center for Black Church Studies, and the Chinese American Institute for Empowerment (hereinafter "Joint Parties"), respectfully request the inclusion of Southern California Edison's ("SCE") and San Diego Gas & Electric's ("SDG&E") community relations and outreach relating to the San Onofre Nuclear Generating Station ("SONGS") among the issues to be considered in this investigation.

This investigation has been ordered to, among other objectives, to examine "each utility's responses" to the SONGS shut down.¹ The scoping memo notes that "directives" may issue to SCE and SDG&E to "promote just and reasonable rates, services, and facilities in furtherance of the public interest."² The Joint Parties urge the inclusion of community outreach in the Commission's definition of services and responses, as well as an evaluation of SCE's and SDG&E's response to the shut down with regard to the surrounding community.

¹ Order Instituting Investigation Regarding San Onofre Nuclear Generating Station Units 2 and 3, Nov. 1, 2012 at pg. 21.

² *Id.* at 12. (emphasis added).

As the Commission well knows from the San Bruno gas line explosion, the effects of a utility error are not merely measured in terms of physical damage or lives lost. This is particularly true when a nuclear facility is at the center of that error. SCE's and SDG&E's response to residents' fears of dangers, real or perceived, are no less relevant in an evaluation of post-shutdown behavior than are the procedural and technical responses taken by each utility. The ratepayers deserve a high level of dialogue and engagement from those who operate nuclear facilities in their midst, all at ratepayer expense.

This Commission has taken the view in the past that education and outreach are important to the success of utility interactions with ratepayers. With regard to low-income populations in particular, "one of the most notable barriers [to reaching those communities] was identified as *lack of trust*. . ." which "was further compounded by cultural and language barriers. . . ." ³

A review of the utilities' outreach and community interaction subsequent to the SONGS shutdown, and what actions they have taken with regard to cultivating the trust of ratepayer communities, is wholly appropriate and in line with Commission priorities.

In the Scoping Memo, the Commission has rightly committed itself to do all "things that are necessary and convenient to supervise and regulate matters under our jurisdiction in the public interest."⁴ The Joint Parties urge that a review of each utility's community outreach response to the SONGS shutdown, as well as a review of any future outreach plans related to nuclear power, be included among the issues considered in this investigation.

As this proceeding will consider the "operations, practices, programs, [and] services . . ." which are "necessary to promote the safety, health, comfort, and convenience of . . . the

³ D. 12-08-044, Finding of Fact 48, pg 318. (emphasis added).

⁴ *Id.*

public[,]”⁵ we urge the inclusion of the following proposed issue be considered under heading 5.1 of the Scoping Memo:

The reasonableness and prudence of each utility action and expenditure with respect to community outreach to both the immediate communities around SONGS and California residents generally.

We also urge the Commission to order SCE and SDG&E to furnish any and all materials relating to their relations with communities proximate to SONGS, including, but not limited to: safety procedures, outreach plans, and marketing campaigns.

The degree to which ratepayers’ are educated and how well their concerns are alleviated is no less important than how well their money is spent, and we respectfully request the investigation be expanded to encompass these issues.

Dated: November 14, 2012

Respectfully submitted,

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⁵ Order Instituting Investigation Regarding San Onofre Nuclear Generating Station Units 2 and 3, Nov. 1, 2012 at pg. 12.