

From: Doll, Laura
Sent: 12/17/2012 10:03:23 AM
To: TerKeurst, Charlotte (charlotte.terkeurst@cpuc.ca.gov)
Cc: Cherry, Brian K (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7);
Hook, Charlyn A. (charlyn.hook@cpuc.ca.gov)
Bcc:
Subject: RE: Followup info

Charlotte and Charlyn

Here is some background that Jonathan Seager put together on this issue:

SCE did have a memo account established (GRC RRMA) authorized on March 1, 2011; however, the decision explicitly established a new account called SONGSMA. There is also language dictating what is to be tracked in the SONGSMA, not the GRC RRMA.

Procedural History

- *December 20, 2011: TURN files motion to establish memo account for SCE's GRC, anticipating timeline issues*
- *January 13, 2011: SCE opposes TURN motion, doesn't feel the memo account is appropriate at that time*
- *March 1, 2011: Scoping memo approves general GRC RRMA (memo account)*
- *July 25, 2011 – October 17, 2011: Evidentiary hearings and briefing (conclude)*
- *January 2012: SONGS shuts down*

Decision Verbiage

- *D. 12-11-051, p. 30: No evidence in record regarding SONGS outage or costs (briefing had concluded)*

- *D. 12-11-051, p. 30: Decision establishes SONGSMA (memo account) which differs from the GRC RRMA authorized on March 1, 2011.*
- *D. 12-11-051, p. 821 Findings of Fact 10: "Reasonable to authorize SCE to establish SONGSMA, effective January 1, 2012"*
- *D. 12-11-051, p. 881 OP 10: "...establish a SONGSMA effective January 1, 2012..."*

Hope this is helpful.

Thanks

Laura

From: TerKeurst, Charlotte [mailto:charlotte.terkeurst@cpuc.ca.gov]
Sent: Sunday, December 16, 2012 8:55 PM
To: Doll, Laura
Cc: Hook, Charlyn A.
Subject: RE: Followup info

Laura,

Thanks for the info.

On the SCE memo account for SONGS, that may not be completely on-point, because (I think) there may already have been a general memo account effective 1-1-2012 for SCE because of the pendency of SCE's GRC. The same situation may also exist for SDG&E due to its pending GRC.

After refreshing my memory a little, I think an important issue may be whether the costs and ratemaking at issue fall in the category of "general ratemaking." But this is just a thought, which I want to look into further.

--Charlotte

Charlotte F. TerKeurst

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From: Doll, Laura [LRDD@pge.com]
Sent: Friday, December 14, 2012 11:08 AM
To: TerKeurst, Charlotte
Subject: Followup info

Charlotte

Here's a link to a recent Commission decision that may be helpful – SCE GRC. On page 30, you'll see that the Commission authorized SCE to establish a SONGS memo account effective January 1, 2012 to track for post-2011 expenditures.

That decision was voted out November 29, 2012.

http://www.regrel/Docs/GRC2012-SCE-Ph-I/Final-Decisions/CPUC/2012/GRC2012-SCE-Ph-I_Final-Dec_CPUC_20121129_D-12-11-051_256121.pdf

To clarify one aspect of our discussion yesterday, PG&E initially asked for a memorandum account on December 2, 2010 (Advice 3171-G), but that was denied (without prejudice) on May 5, 2011 (Resolution G-3453). In denying our request, the Commission said it would evaluate the request in the Gas Safety OIR (R.11-02-019) which is where PSEP is housed. We filed for a MA in this proceeding the same day – May 2011. That motion has been pending for 18 months without the ALJ or Commission considering it. The Bushey PD specifically denies including any expenses incurred prior to the effective date of the decision (see pp. 84-85 of the decision.)

Thanks again for the time yesterday.

Laura

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