

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)

PREHEARING CONFERENCE STATEMENT OF THE
COALITION OF CALIFORNIA UTILITY EMPLOYEES

January 7, 2012

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**PREHEARING CONFERENCE STATEMENT OF THE
COALITION OF CALIFORNIA UTILITY EMPLOYEES**

Pursuant to the Order Instituting Investigation Regarding San Onofre Nuclear Generating Station Units 2 and 3, the Coalition of California Utility Employees respectfully submits this Prehearing Conference Statement.

I. The Scoping Memo Should Include CUE's Proposed Additional Issue

The OII recommends that PHC statements should include the party's recommended exact proposed wording for issues. CUE's Response to the OII recommended including an issue related to the SONGS workforce, as the OII currently does not directly address the effect of SONGS' extended outages on the utilities' trained workforce and the effects of the planned layoffs on the ratepayers,¹ nor does it directly address the safety issues caused by this downsizing.

Additionally, on January 4, 2013, SCE and SDG&E filed their PHC statement which proposed separating the proceeding into four phases. Phase D addresses the

¹ Response of the Coalition of California Utility Employees to the OII, p. 6.

future of SONGS operations. However, the OII currently lacks oversight into the staffing decisions between now and the final outcome of this proceeding to ensure the safest restart of SONGS.

CUE again proposes adding this issue to the Scoping Memo as follows:

Issue 7: The reasonableness and necessity of downsizing the trained workforce at SONGS Units 2 and 3 and the related effects on patrons, employees, and the public, reviewed within the context of safety and ratepayer investment.

7. Conclusion

The OII should include investigating the effects of downsizing the trained workforce at SONGS, on not only the employees, but also the ratepayers and the public's safety. It is important not to foreclose the ability to safely restart SONGS if that is the eventual outcome of this OII. Therefore, CUE recommends this OII add the proposed Issue 7.

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Respectfully submitted,

/S/

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