



Clay Faber - Director  
Regulatory Affairs  
8330 Century Park Court  
San Diego, CA 92123-1548

Tel: 858.654.3563  
Fax: 858.654.1788  
cfaber@semprautilities.com

February 14, 2013

California Public Utilities Commission  
Energy Division  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: REPLY OF SAN DIEGO GAS & ELECTRIC COMPANY TO PROTEST OF ADVICE  
LETTER 2450-E**

Dear Energy Division:

In accordance with Section 7.4.3 of General Order (GO) 96-B of the California Public Utilities Commission (Commission), San Diego Gas & Electric Company (SDG&E) respectfully submits this reply to the protests submitted by Alliance for Nuclear Responsibility (A4NR), Coalition to Decommission San Onofre and Ruth Henricks (Coalition), to SDG&E Advice Letter (AL) 2450-E, which provided notice of certain capital projects that SCE is implementing at San Onofre Nuclear Generating Station (SONGS).

In their protests, A4NR and the Coalition object to SDG&E's advice filing alleging that the filing had material omissions regarding the timing of when SCE management approved the projects. The Coalition also asserts that SCE should not be incurring costs for SONGS until the Nuclear Regulatory Commission (NRC) approves SCE's proposal to restart SONGS Unit 2.

The protests of A4NR and the Coalition are without merit and should be rejected. SDG&E's Advice Letter simply provided notice to its service territory of the SCE Advice Letter 2450-E, which provided sufficient information regarding the capital projects, including pertinent information regarding the scope of the projects, costs, and expected timing for implementing the projects.

**DISCUSSION**

A4NR and the Coalition assert that SDG&E made material omissions by not providing the timing of when SCE management approved the capital projects identified in AL 2838-E. SDG&E respectfully submits that SCE has provided sufficient information regarding the projects, including a description of each project's scope, costs, and expected timing for implementing the projects (including identifying the projects for Unit 3 that SCE has deferred or rescheduled). SCE also indicated in AL 2838-E that all of the projects were approved by management before the OII was issued, and, therefore, the timing of management approval was clear in the AL.

A4NR characterizes SDG&E's reference in its advice letter to information in SCE's Advice Letter 2838 pertaining to "certain capital projects that Southern California Edison ... is implementing at San Onofre Nuclear Generating Station" as amounting to a "role of a passive check-writer" and that SDG&E's "role is somewhat meatier than just wring checks." It then quotes language in the January 28, 2013 Scoping Memo at page 8 stating that "as a co-owner, SDG&E has a duty to monitor SCE's responses in this OII and to supplement them or challenge them based on its own obligation to ensure safe and reliability service." A4NR conveniently ignores that this statement pertains to discovery requests. SCE's advice letter is not a response to a data request. In any event, if SDG&E determines that any filing or data response submitted by SCE is inaccurate or in error, SDG&E will make its views on such matters known to the Commission. As pertains to the instant SCE advice letter, SDG&E is informed and believes that the information submitted by SCE is accurate and complete.

### **CONCLUSION**

In summary, the protests of A4NR and the Coalition should be rejected for the reasons discussed above.

Respectfully Submitted,

---

Clay Faber  
Director – Regulatory Affairs

cc: Edward Randolph, CPUC Energy Division, Director  
Eric Greene, CPUC Energy Division  
Don Lafrenz, CPUC Energy Division  
John L. Geesman, Attorney for A4NR  
Martha Sullivan, on behalf of The Coalition to Decommission San Onofre and Ruth Henricks  
Service List I.12-10-013