

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate and Refine
Procurement Policies and Consider Long-Term
Procurement Plans

R.13-12-010
(Filed December 19, 2013)

**RESPONSE OF CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE,
SIERRA CLUB, NATURAL RESOURCES DEFENSE COUNCIL, PROTECT OUR
COMMUNITIES FOUNDATION, THE UTILITY REFORM NETWORK, AND UNION
OF CONCERNED SCIENTISTS TO SOUTHERN CALIFORNIA EDISON COMPANY'S
MOTION TO NOT INCLUDE THE RESULTS OF ITS STOCHASTIC STUDY OF THE
2012 LTPP TRAJECTORY SCENARIO IN ITS TESTIMONY IN THIS DOCKET**

WILLIAM ROSTOV
Staff Attorney
Earthjustice California Office
50 California Street, Suite 500
San Francisco, CA 94111
Telephone: (415) 217-2000
E-mail: wrostov@earthjustice.org

MATTHEW VESPA
Senior Attorney
Sierra Club
85 Second Street, 2nd Floor
San Francisco, CA 94105
Telephone: (415) 977-5753
E-mail: matt.vespa@sierraclub.org

Attorneys for Sierra Club

DEBORAH BEHLES
DAVID ZIZMOR
Environmental Law & Justice Clinic
Golden Gate University School of Law
536 Mission Street
San Francisco, CA 94105
Telephone: (415) 369-5336
Facsimile: (415) 896-2450
E-mail: dbehles@ggu.edu,
dzizmor@ggu.edu

SHANA LAZEROW
Staff Attorney
Communities for a Better Environment
1904 Franklin Street, Suite 600
Oakland, CA 94612
Telephone: (510) 302-0430
E-mail: slazerow@cbeal.org

Attorneys for California Environmental
Justice Alliance

SIERRA MARTINEZ
Legal Director, California Energy Project
Natural Resources Defense Council
111 Sutter Street, Floor 20
San Francisco, CA 94104
E-mail: smartinez@nrdc.org

Attorney for Natural Resources Defense
Council

LAURA WISLAND
Senior Energy Analyst
Union of Concerned Scientists
500 12th Street, Suite 340
Oakland, CA 94607
Telephone: (510) 809-1565
E-mail: lwisland@ucsusa.org

Senior Analyst for Union of Concerned
Scientists

MARCEL HAWIGER
Staff Attorney
The Utility Reform Network
785 Market Street, Suite 1400
San Francisco, CA 94703
Tel: (415) 929-8876
Email: marcel@turn.org

Attorney for The Utility Reform Network

Dated: August 27, 2014

DAVID A. PEFFER
Protect Our Communities Foundation
4452 Park Boulevard, Suite 209
San Diego, CA 92116
Telephone: (760) 715-0407
E-mail: david.a.peffer@gmail.com

Attorney for Protect Our Communities
Foundation

**RESPONSE OF CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE,
SIERRA CLUB, NATURAL RESOURCES DEFENSE COUNCIL, PROTECT OUR
COMMUNITIES FOUNDATION, THE UTILITY REFORM NETWORK, AND UNION
OF CONCERNED SCIENTISTS TO SOUTHERN CALIFORNIA EDISON COMPANY'S
MOTION TO NOT INCLUDE THE RESULTS OF ITS STOCHASTIC STUDY OF THE
2012 LTPP TRAJECTORY SCENARIO IN ITS TESTIMONY IN THIS DOCKET**

Pursuant to Rule 11.1(e) of the Commission Rules of Practice and Procedure, the California Environmental Justice Alliance (“CEJA”), Sierra Club, Natural Resources Defense Council (“NRDC”), Protect Our Communities Foundation (“POC”), The Utility Reform Network (“TURN”), and the Union of Concerned Scientists (“UCS”) submit this response in opposition to Southern California Edison Company’s Motion to Not Include the Results of Its Stochastic Study of the 2012 LTPP Trajectory Scenario in Its Testimony in This Docket (“SCE Motion”), filed August 13, 2014.

During the July 11, 2014 Status Conference, Southern California Edison (“SCE”) indicated it would provide the results of its stochastic study of the 2012 LTPP trajectory scenario (“2012 Trajectory Study”) in lieu of studying the 2014 LTPP trajectory scenario (“2014 Trajectory Study”).¹ Then, the ALJ’s Ruling Modifying Schedule for Phase 1A, dated August 6, 2014 (“ALJ’s Ruling”), required SCE to provide testimony on a stochastic study of the 2014 LTPP trajectory scenario by November 13, 2014. SCE’s Motion requests that the Commission no longer require SCE to submit the results of its 2012 Trajectory Study. The Commission should deny the SCE Motion. Including the 2012 study results and all workpapers requires little incremental work and can provide a valuable comparison of the impacts of different assumptions and methodologies on stochastic modeling results so as to ensure a robust record.

¹ RT at p. 12:10-14; “Ms. Schmid-Frazee: . . . We can enter the results of our 2012 LTPP study on the trajectory scenario into the record and provide witnesses concerning that study if the Commission needs SCE’s study results for a trajectory scenario.”

Initially, in the ALJ’s Ruling, the primary reason for modifying the schedule was “to ensure a more complete record” since “stochastic models...are more likely to provide robust and improved results.”² Including the 2012 Trajectory Study here would not only ensure a more “complete” and “robust” record, but also it would allow the Commission to gain some perspective on stochastic modeling by examining the changes between the 2012 and 2014 methodologies and results. Comparing the impacts of the 2012 and 2014 modeling may provide insights into the relative importance of underlying assumptions and data inputs.

The 2012 results are important to evaluating the 2014 modeling methodology. A close look at SCE’s August 13, 2014 testimony reveals that SCE relies on its 2012 Trajectory Study throughout its discussion.³ For example, SCE states that it “found no shortfall through its stochastic study of the 2012 LTPP Trajectory Scenario in 2022.”⁴ SCE continues to offer some comparison of the differences between the 2012 and the 2014 Trajectory Studies: “[t]he 2014 Trajectory Study has a lower load than the corresponding 2012 Trajectory Scenario, which SCE studied for the 2012 LTPP.”⁵ In the Appendix attached to its testimony, SCE states at the outset that “[t]his technical appendix provides a high level comparison of SCE’s 2014 and 2012 stochastic analyses.”⁶ Since SCE references its 2012 Trajectory Study in its testimony, it is important to include the 2012 Study to create a complete and robust record. Indeed, in the previous LTPP, the ALJ required parties to include materials relied upon in their testimony in the record. Following the same policy would require SCE to include its 2012 Trajectory Study here.

² ALJ’s Ruling at p. 2, quoting Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge at p. 4.

³ SCE discussed the 2012 Trajectory Study in its Phase 1a Testimony of Southern California Edison Company on Resource Need (August 13, 2014) at pp. 2-3, 6, 8-10. SCE also discussed the 2012 Trajectory Study in Appendix A – Technical Appendix (August 13, 2014) at pp. 1-3.

⁴ *Id.* at p. 2.

⁵ *Id.*

⁶ SCE Appendix A – Technical Appendix at p. 1.

Requiring the 2012 results will not burden SCE. During the July 11th status conference, SCE freely offered to “enter the results of our 2012 LTPP study of the trajectory scenario into the record and provide witnesses concerning that study if the Commission needs SCE’s study results for a trajectory scenario.”⁷ Since the 2012 study results are already available as a white paper on SCE’s website,⁸ the Commission would be asking very little of SCE. Furthermore, SCE utilized ratepayer funding to conduct its 2012 Trajectory Study, and therefore should include it in the public record.

The Commission should therefore deny the SCE Motion, and instead should require SCE to provide both the 2012 study results, as well as all associated workpapers, with its supplemental testimony due on November 13, 2014.

Dated: August 27, 2014

Respectfully submitted,

/s/ DAVID A. ZIZMOR

By: David A. Zizmor

WILLIAM ROSTOV
Staff Attorney
Earthjustice
50 California Street, Suite 500
San Francisco, CA 94111
Telephone: (415) 217-2000
Email: wrostov@earthjustice.org

MATTHEW VESPA
Senior Attorney
Sierra Club
85 Second Street, 2nd Floor
San Francisco, CA 94105

DAVID ZIZMOR
DEBORAH BEHLES
Environmental Law & Justice Clinic
Golden Gate University School of Law
536 Mission Street
San Francisco, CA 94105
Telephone: (415) 442-6656
Facsimile: (415) 896-2450
dzizmor@ggu.edu, dbehles@ggu.edu

SHANA LAZEROW
Staff Attorney
Communities for a Better Environment

⁷ RT at p. 12:10-14.

⁸ *Id.* at p. 11:24-28. The 2012 study results are also available on the website for the Western Electricity Coordinating Council at:
<http://www.wecc.biz/committees/BOD/TEPPC/Lists/2014TEPPCStudyProgram/Attachments/54/2013-01-17%202012%20LTPP%20T2%20SCE%20White%20Paper%20.pdf>.

Telephone: (415) 977-5753
Email: matt.vespa@sierraclub.org

Attorneys for SIERRA CLUB

SIERRA MARTINEZ
Legal Director, California Energy Project
Natural Resources Defense Council
111 Sutter Street, Floor 20
San Francisco, CA 94104
smartinez@nrdc.org

Attorney for NATURAL RESOURCES
DEFENSE COUNCIL

DAVID A. PEFFER
Protect Our Communities Foundation
4452 Park Boulevard, Suite 209
San Diego, CA 92116
Telephone: (760) 715-0407
E-mail: david.a.peffer@gmail.com

Attorney for PROTECT OUR
COMMUNITIES FOUNDATION

1904 Franklin Street, Suite 600
Oakland, CA 94612
Telephone: (510) 302-0430
slazerow@cbecal.org

Attorneys for CALIFORNIA
ENVIRONMENTAL JUSTICE
ALLIANCE

LAURA WISLAND
Senior Energy Analyst
Union of Concerned Scientists
500 12th Street, Suite 340
Oakland, CA 94607
Telephone: 510-809-1565
E-mail: lwisland@ucsusa.org

Senior Analyst for the UNION OF
CONCERNED SCIENTISTS

MARCEL HAWIGER
Staff Attorney
The Utility Reform Network
785 Market Street, Suite 1400
San Francisco, CA 94703
Telephone: (415) 929-8876
E-mail: marcel@turn.org

Attorney for THE UTILITY REFORM
NETWORK