

August 19, 2015

Ms. April Mulqueen  
Policy and Planning Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: SFI – Safety Intervenor

Dear Ms. Mulqueen:

Southern California Edison Company (“SCE”) submits these comments in response to your July 30, 2015 Solicitation For Input (SFI) on the role of safety intervenors in relevant California Public Utility Commission (Commission) proceedings.

The SFI cites the example of utility General Rate Cases (GRCs) and that intervenors in those proceedings tend to focus on cost reduction. The SFI also notes that the Commission seeks to strike the right balance to promote safety and reliability of the utility system, while also ensuring a financially stable utility at a reasonable cost to consumers. SCE strongly supports that direction. The comments below provide SCE’s observations based on its experience in utility GRCs.

**1. Should the Commission ensure there is an organization specifically dedicated to utility safety issues in Commission proceedings?**

The safety of our employees, customers, and the general public is of paramount importance to SCE. Safety should be a key issue in many Commission proceedings, such as utility GRCs. The Commission’s recent revisions to the Rate Case Plan now require separate showings on safety – the S-MAP and RAMP. Other Commission proceedings, such as the Fire Safety Rulemaking, also have an obvious focus on safety and should include participation of a dedicated safety organization.

However, SCE does not see the need for a safety organization to participate in every Commission proceeding. For example, energy utilities routinely file applications under Rule 3.5 requesting Commission approval to issue equity or long-term debt. Energy utilities also file cost of capital applications for approval of their capital structures and costs of debt and equity. Requiring a dedicated safety organization to participate in financing and cost of capital proceedings would not meaningfully contribute to safety. More importantly, requiring a safety organization to participate in every Commission proceeding may stretch the resources of that

organization and dilute its ability to meaningfully contribute in proceedings that should include a safety focus. Therefore, rather than a blanket mandate applying to all Commission proceedings, SCE recommends a more focused approach of requiring a safety organization to participate in those proceedings where it makes sense to do so.

**2. What organizations, new or existing, should intervene on utility safety issues?**

SCE does not take a position on this issue but may reply to other parties' comments.

**3. Should ORA or other intervenors on behalf of ratepayers be responsible for both safety and rate advocacy?**

ORA's mandate under Public Utilities Code Section 309.5 is to advocate for the lowest rates consistent with safe and reliable service. In SCE's experience, ORA's focus in GRC proceedings has been on lowering costs. ORA's testimony has not included any analysis of the effects of their cost proposals on utility reliability and safety. SCE sees this as an issue that would benefit from further definition by the Commission to refocus resources to meet the full intent of Section 309.5.

**4. Are there competencies the Commission must require for a safety intervenor?**

SCE takes no position on this issue but may reply to other parties' comments.

**5. Are there conflicts that should be addressed in intervenor safety participation; for example, a ratepayer advocate who also seeks compensation as an advocate for a safety action or expenditure?**

SCE takes no position on this issue but may reply to other parties' comments.

**6. Are there barriers to safety advocate participation that the Commission must address?**

SCE takes no position on this issue other than to note that the Legislature has enacted statutes that govern the extent to which intervenors may be compensated for participating in Commission proceedings. These criteria include a showing of substantial contribution and of financial hardship. Those same criteria should be applied in the case of intervenor participation on safety issues.

Thank you for your consideration of this request. Please do not hesitate to contact me at (626) 302-4177 if you have any questions.

Sincerely,



Russell G. Worden