

PUBLIC UTILITIES COMMISSION

SAN FRANCISCO, CA 94102-3298



May 12, 2010

**Advice Letters 2359-E and 2359-E-A**

Akbar Jazayeri  
Vice President, Regulatory Operations  
Southern California Edison Company  
P O Box 800  
Rosemead, CA 91770

**Subject: Submission of Contract for Procurement of Renewable Energy from SCE's  
2008 Renewables Portfolio Standard Solicitation and Supplemental Filing**

Dear Mr. Jazayeri:

Advice Letters 2359-E and 2359-E-A are effective December 17, 2009 per Resolution E-4293.

Sincerely,

A handwritten signature in blue ink, appearing to read "Julie A. Fitch".

Julie A. Fitch, Director  
Energy Division

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October 22, 2009

**ADVICE 2359-E-A**  
**(U 338-E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

**SUBJECT:** Supplement to Submission of Contract for Procurement of  
Renewable Energy From SCE's 2008 Renewables Portfolio  
Standard Solicitation

**PURPOSE**

On July 13, 2009, Southern California Edison Company ("SCE") filed Advice 2359-E seeking California Public Utilities Commission ("Commission" or "CPUC") approval of a renewables portfolio standard ("RPS") power purchase agreement (the "Echanis Contract") between SCE and Echanis, LLC ("Echanis"). The purpose of this advice filing is to supplement Advice 2359-E in order to include Amendment No. 1 to the Echanis Contract ("Amendment No. 1").

In accordance with General Order ("GO") 96-B, the confidentiality of information included in this advice filing is described below. This advice filing contains both confidential and public attachments. Attachment 1: *Designation of Confidential Information*, is public. Attachment 2: *Amendment No. 1 to the Echanis Contract*, is confidential.

**BACKGROUND**

On July 13, 2009, SCE filed Advice 2359-E seeking Commission approval of the Echanis Contract. On October 9, 2009, SCE executed Amendment No. 1, which makes minor technical corrections to one of the standard terms and conditions in the Echanis Contract.

This advice filing supplements Advice 2359-E in order to include Amendment No. 1, which is attached hereto as Attachment 2. The minor technical corrections in Amendment No. 1 do not change the substance of the Echanis Contract and conform the relevant standard term and condition to the standard term and condition adopted by

the Commission in Decision (“D.”) 08-04-009 and D.08-08-028. Accordingly, the Commission should expeditiously approve the Echanis Contract as provided in Advice 2359-E.

### **CONFIDENTIALITY**

SCE is requesting confidential treatment of Attachment 2 to this advice filing. The information for which SCE is seeking confidential treatment is identified in Attachment 1 hereto. The confidential version of this advice filing will be made available to appropriate parties (in accordance with SCE’s Proposed Protective Order, as discussed below) upon execution of the required non-disclosure agreement. Parties wishing to obtain access to the confidential version of this advice filing may contact Joni Templeton in SCE’s Law Department at [Joni.Templeton@sce.com](mailto:Joni.Templeton@sce.com) or (626) 302-6210 to obtain a non-disclosure agreement. In accordance with GO 96-B, a copy of SCE’s Proposed Protective Order was provided as Appendix I to Advice 2359-E, filed on July 13, 2009. It is appropriate to accord confidential treatment to the information for which SCE requests confidential treatment in the first instance in the advice letter process because such information is entitled to confidentiality protection pursuant to D.06-06-066 and is required to be filed by advice letter as part of the process for obtaining Commission approval of RPS power purchase agreements.

The information in this advice filing for which SCE requests confidential treatment, the pages on which the information appears, and the length of time for which the information should remain confidential, are provided in Attachment 1. This information is entitled to confidentiality protection pursuant to D.06-06-066 (as provided in the Investor Owned Utility (“IOU”) Matrix, Appendix 1 to D.06-06-066). The specific provisions of the IOU Matrix that apply to the confidential information in this advice filing are identified in Attachment 1.

The confidential information provided in this advice filing cannot be aggregated, redacted, summarized, masked, or otherwise protected in a manner that would allow partial disclosure of the data, while still protecting confidential information, because the RPS contract advice filing template calls for the data to be provided in its present form. SCE would object to any disclosure of the confidential information in aggregated form. Based on the format of the RPS contract advice filing template, SCE is not aware of any manner that the confidential information could be aggregated that would qualify the information for public status under the IOU Matrix of D.06-06-066.

To the best of my knowledge, SCE and the Independent Evaluator maintain as confidential the information contained in this advice filing for which confidentiality is sought. SCE is informed and believes that this information is maintained by SCE’s Renewable and Alternative Power Department and the Independent Evaluator and provided internally only to those employees who need to know the information to carry out their job duties. SCE is also informed and believes that this information has not

been disclosed to any person other than employees of SCE, the Independent Evaluator, or non-market participants (such as staff of the CPUC).

### **TIER DESIGNATION**

Pursuant to GO 96-B, Energy Industry Rule 5.3, SCE submits this advice filing with a Tier 3 designation (effective after Commission approval).

### **EFFECTIVE DATE**

SCE requests that this advice filing become effective subject to review and approval by the Commission.

### **PROTESTS**

SCE asks that the Commission maintain the original protest and comment period as designated in Advice 2359-E, filed on July 13, 2009, because this supplemental advice filing is simply providing Amendment No. 1, which makes minor technical corrections to one of the standard terms and conditions in the Echanis Contract. These minor technical corrections do not change the substance of the Echanis Contract and conform the relevant standard term and condition to the standard term and condition adopted by the Commission in D.08-04-009 and D.08-08-028. If protests are allowed, pursuant to GO 96-B, Section 7.5.1, they should be limited to the substance of this supplemental advice filing or additional information.

### **NOTICE**

In accordance with Section 4 of GO 96-B, SCE is furnishing copies of this advice filing to the interested parties shown on the attached R.08-08-009, R.06-02-012, and GO 96-B service lists. Address change requests to the GO 96-B service list should be directed to [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com) or at (626) 302-2930. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice letter at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at <http://www.sce.com/AboutSCE/Regulatory/adviceletters/>.

All questions concerning this advice filing should be directed to Laura Genao at (626) 302-6842 (E-mail: [laura.genao@sce.com](mailto:laura.genao@sce.com)).

**Southern California Edison Company**

Akbar Jazayeri

AJ:lg:sq  
Enclosures

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

ELC       GAS  
 PLC       HEAT       WATER

Contact Person: James Yee

Phone #: (626) 302-2509

E-mail: [James.Yee@sce.com](mailto:James.Yee@sce.com)

E-mail Disposition Notice to: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas  
 PLC = Pipeline      HEAT = Heat      WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2359-E-A

Tier Designation: 3

Subject of AL: Supplement to Submission of Contract for Procurement of Renewable Energy Resulting From SCE's 2008 Renewables Portfolio Standard Solicitation

Keywords (choose from CPUC listing): Compliance, Contracts, Procurement

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: \_\_\_\_\_

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: \_\_\_\_\_

Confidential treatment requested?  Yes  No

If yes, specification of confidential information: See Attachment 1.

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement.

Name and contact information to request nondisclosure agreement/access to confidential information:

Joni Templeton, Law Department, at (626) 302-6210 or [Joni.Templeton@sce.com](mailto:Joni.Templeton@sce.com).

Resolution Required?  Yes  No

Requested effective date: Upon Commission approval

No. of tariff sheets: -0-

Estimated system annual revenue effect: (%): \_\_\_\_\_

Estimated system average rate effect (%): \_\_\_\_\_

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed<sup>1</sup>: \_\_\_\_\_

Pending advice letters that revise the same tariff sheets: \_\_\_\_\_

<sup>1</sup> Discuss in AL if more space is needed.

**All correspondence regarding this AL shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Ave.,  
San Francisco, CA 94102  
[inj@cpuc.ca.gov](mailto:inj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)

Akbar Jazayeri  
Vice President of Regulatory Operations  
Southern California Edison Company  
2244 Walnut Grove Avenue  
Rosemead, California 91770  
Facsimile: (626) 302-4829  
E-mail: [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com)

Bruce Foster  
Senior Vice President, Regulatory Affairs  
c/o Karyn Gansecki  
Southern California Edison Company  
601 Van Ness Avenue, Suite 2040  
San Francisco, California 94102  
Facsimile: (415) 929-5540  
E-mail: [Karyn.Gansecki@sce.com](mailto:Karyn.Gansecki@sce.com)

Marc Ulrich  
Vice President, Renewable and Alternative Power  
c/o Mike Marelli  
Southern California Edison Company  
2244 Walnut Grove Avenue, Quad 4D  
Rosemead, California 91770  
Facsimile: (626) 302-1103  
E-mail: [Mike.Marelli@sce.com](mailto:Mike.Marelli@sce.com)

With a copy to:

Joni A. Templeton  
Attorney  
Southern California Edison Company  
2244 Walnut Grove Avenue, 3<sup>rd</sup> Floor  
Rosemead, California 91770  
Facsimile: (626) 302-1935  
E-mail: [Joni.Templeton@sce.com](mailto:Joni.Templeton@sce.com)

**Attachment 1**  
**Designation of Confidential Information**

**DESIGNATION OF CONFIDENTIAL INFORMATION**

Identified below are the data in SCE’s advice filing for which SCE is seeking confidential protection and the categories of the Matrix of Allowed Confidential Treatment Investor Owned Utility (“IOU”) Data (the “IOU Matrix”) to which these data correspond. Also set forth is the period of time for which confidential protection is authorized by the IOU Matrix.

<b>Data</b>	<b>Page</b>	<b>Matrix Category</b>	<b>Period of Confidentiality</b>
Amendment No. 1 to the Echanis Contract (which is attached as Attachment 2 to this advice filing)	Entire Document	VII.F/VII.G RPS Contracts	RPS contracts confidential for three years, or until one year following expiration, whichever comes first.

**Attachment 2**

**Amendment No. 1 to the Echanis Contract**

**Confidential – Public Disclosure Prohibited**