

PUBLIC UTILITIES COMMISSION

SAN FRANCISCO, CA 94102-3298



March 29, 2012

Advice Letter 2657-E and 2657-E-A

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

**Subject: Amendments to Southern California Edison Company's
Assembly Bill (AB) 1969 CREST Agreements and Supplemental Filing**

Dear Mr. Jazayeri:

Advice Letter 2657-E and 2657-E-A are effective November 21, 2011.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, Director
Energy Division

January 25, 2012

ADVICE 2657-E-A
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Supplement to Submission of Amendments to Southern California Edison Company's Assembly Bill (AB) 1969 CREST Agreements

PURPOSE

The purpose of this advice filing is to supplement, in part, Advice 2657-E in order to retract references in Advice 2657-E to Southern California Edison Company's (SCE's) Application for Rehearing (AFR) of the California Public Utilities Commission's (Commission's) Decision (D.)11-11-012 and SCE's intent to sign California Renewable Energy Small Tariff (CREST) contracts under protest. SCE withdrew its AFR on December 28, 2011, and the AFR was dismissed by order of Executive Director Paul Clanon on January 11, 2012. As a result, SCE re-signed the CREST contracts without protest. Accordingly, SCE seeks to remove references in Advice 2657-E to the AFR and signing CREST contracts under protest.

BACKGROUND

As directed by D.11-11-012, SCE submitted Advice 2657-E on November 21, 2011, incorporating the following changes to the Full Buy/Sell Power Purchase Agreement and CREST Excess Power Purchase Agreement (collectively the CREST Agreements): (1) modification of Sections 2.8 (Date of Initial Operation), 4.2(d)(3) (Term and Termination), Section 4 (Term and Termination), and Section 12 (Assignment); (2) removal of Sections 14.2 (Future Modifications) and 14.4 (Application for Modifications); (3) modification of the eligibility for contract execution; and (4) the addition of provisions regarding Force Majeure, Indemnification, curtailment, development security, and interconnection agreement options.

On November 21, 2011, SCE concurrently filed its AFR of D.11-11-012. On December 28, 2011, SCE requested to withdraw its AFR via letter to the Commission's

Executive Director Paul Clanon. CREST contracts executed under protest by SCE were re-signed without protest on December 29, 2011. The Executive Director issued D.12-01-001 on January 11, 2012 dismissing the AFR pursuant to SCE's request.

In light of SCE's withdrawal of its AFR and re-signing of CREST contracts without protest, SCE hereby supplements, in part, Advice 2657-E by deleting the following paragraph:

As stated in SCE's opening and reply comments to D.11-11-012, SCE objects to the Commission's use of the MPR as the CREST contract price as an unlawful, administratively-determined price that is contrary to federal law. See U.S.C. § 791 *et seq.* (otherwise known as the Federal Power Act of 1935). Accordingly, although SCE must file this advice letter submitting the revised CREST Agreements in compliance with D.11-11-012, SCE does not waive this objection and will sign any CREST Agreements under protest until the Commission remedies this unlawful pricing scheme. SCE will also file an Application for Rehearing (AFR) of D.11-11-012 on this issue.

TIER DESIGNATION

Pursuant to D.11-11-012, this advice letter is submitted with a Tier 1 designation.

EFFECTIVE DATE

This advice filing will become effective on November 21, 2011, the date Advice 2657-E was filed.

PROTESTS

SCE asks that the Commission maintain the original protest and comment period as designated in Advice 2657-E and not reopen the protest period or allow additional comments given the limited nature of the modifications made by this supplemental advice letter.

NOTICE

In accordance with Section 4 of General Order (GO) 96-B, SCE is serving copies of this advice filing to the interested parties shown on the attached GO 96-B and R.11-05-005 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or (626) 302-2930. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at 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 filing 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>.

For questions, please contact Laura Genao at (626) 302-6842 or by electronic mail at 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: Susan Quon

Phone #: (626) 302-2930

E-mail: Susan.Quon@sce.com

E-mail Disposition Notice to: 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) #: 2657-E-A

Tier Designation: 1

Subject of AL: Supplement to Submission of Amendments to Southern California Edison Company's Assembly Bill 1969 CREST Agreements

Keywords (choose from CPUC listing): Compliance, Agreements

AL filing type: Monthly Quarterly Annual One-Time Other

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

D.11-11-012

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 AL¹: _____

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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:

Resolution Required? Yes No

Requested effective date: 11/21/11 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 proposed¹: _____

Pending advice letters that revise the same tariff sheets: _____

¹ 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 and mas@cpuc.ca.gov

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