

James A. Cuillier Director FERC Rates & Regulation

December 1, 2016

Ms. Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, DC 20426

RE: Southern California Edison Company's Formula Transmission Rate Annual Update Filing in Docket No. ER11-3697-\_\_\_ (TO11)

Dear Ms. Bose:

Under Southern California Edison Company's ("SCE") Transmission Owner Tariff ("TO Tariff"), SCE calculates its retail and wholesale Base Transmission Revenue Requirements ("Base TRR") using a formula transmission rate. SCE hereby submits for informational purposes its fifth annual formula transmission rate annual update filing ("TO11 Annual Update"), pursuant to Section 3 of Attachment 1 to Appendix IX of SCE's TO Tariff (the "Formula Rate Protocols"). The TO11 Annual Update revises SCE's retail and wholesale Base TRR and associated retail and wholesale transmission rates effective January 1, 2017. Pursuant to the formula rate set forth in Attachment 2 to Appendix IX of SCE's TO Tariff (the "Formula Rate"), this Annual Update revises the retail Base TRR from the currently-effective amount of \$1.092 billion to \$1.190 billion, and the wholesale Base TRR from \$1.086 billion to \$1.184 billion.

This submission is provided to the Commission for informational purposes only. This filing is not subject to the requirements of Section 205 of the Federal Power Act, and pursuant to Section 3 of the Formula Rate Protocols, does not subject SCE's Formula Rate to modification.

SCE requests that the Commission issue a notice of filing for the TO11 Annual Update and establish a comment date.

#### I. Background

On June 3, 2011, in Docket No. ER11-3697-001, SCE submitted its original formula transmission rate to the Commission. Several entities intervened or protested the filing. The Commission accepted the filing on August 2, 2011, subject to refund and hearing and settlement judge procedures,<sup>1</sup> with an effective date of January 1, 2012. SCE engaged in settlement discussions with intervening parties, reaching an agreement in principle in July 2013. SCE filed the Offer of Settlement on August 26, 2013, and it was approved by the Commission on November 5, 2013.<sup>2</sup> The Offer of Settlement included revised Attachments 1 and 2 to SCE's TO Tariff Appendix IX, which constitute SCE's currently-effective Formula Rate Protocols and Formula Rate spreadsheet.

SCE filed its fourth formula transmission rate annual update filing ("the TO10 Annual Update") on December 1, 2015, pursuant to the process outlined in the Formula Rate Protocols. The TO10 rates went into effect on January 1, 2016.

SCE filed a modification to Schedule 18 of the Formula Rate spreadsheet on January 6, 2016 in FERC Docket No. ER16-686 proposing modification of the non-transmission depreciation rates to reflect the rates adopted by the CPUC in SCE's 2015 General Rate Case Order. This modification was accepted by the Commission on February 22, 2016. Additionally, SCE filed a modification to Schedule 33 of the Formula Rate spreadsheet on March 30, 2016 in FERC Docket No. ER16-1292 proposing modification of the calculation of retail rates to reflect the CPUC's authorized Net Energy Metering Program. This modification was accepted by the Commission on May 19, 2016. Finally, SCE filed a modification

<sup>&</sup>lt;sup>1</sup> 136 FERC ¶ 61,074 P 1. <sup>2</sup> 145 FERC ¶ 61,103.

to Schedule 33 of the Formula Rate spreadsheet on April 13, 2016 in FERC Docket No. ER16-1393 relating to the allocation of costs and determination of rates for three Standby Rate Groups and three associated Large Power Rate Groups consistent with the CPUC's latest Phase II General Rate Case Order. This modification was accepted by the Commission on June 2, 2016. These three changes are reflected in this TO11 Annual Update.

SCE is now submitting its fifth Annual Update to the Commission in accordance with Section 3 of the Formula Rate Protocols, which specifies that each year SCE will file an Annual Update on or before December 1, revising the Base TRR and associated rates to be effective on January 1.

# II. SCE's Formula Transmission Rate

In SCE's formula transmission rate the Base TRR is calculated as the sum of the Prior Year TRR, the Incremental Forecast Period TRR ("IFPTRR"), and a True Up Adjustment.<sup>3</sup> The Prior Year TRR represents the transmission costs that SCE incurred in the previous calendar year, in this instance, 2015. The IFPTRR represents the incremental transmission costs that SCE expects to incur during the Rate Year as compared to the costs incurred in the Prior Year.<sup>4</sup> The True Up Adjustment trues up actual transmission revenues to actual transmission costs during the Prior Year.

### III. Reasons for the Increase in SCE's Base TRR

As indicated above, in this Annual Update, SCE's retail Base TRR increases from the currently-effective amount of \$1.092 billion to \$1.190 billion, an increase of \$98 million. The wholesale Base TRR also increases by \$98 million, from \$1.086 billion to \$1.184 billion.

<sup>&</sup>lt;sup>3</sup> This is similar to many formula rates in effect. *See, e.g.* SDG&E's approved formula rate in Docket No. ER13-941.

<sup>&</sup>lt;sup>4</sup> The Rate Year for this Annual Update is January 1, 2017 through December 31, 2017.

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The primary reasons for this increase in the Base TRR are the growth in transmission plant in service due to SCE's completion of major transmission projects in 2015, which is offset to a large extent by a reduction in the Incremental Forecast Period TRR relative to TO10, and a positive True Up Adjustment. The TO11 Base TRR reflects the addition of \$921 million in transmission plant inservice in 2015, including segments 8 and 11 of the Tehachapi Renewable Transmission Project and the addition of a new 500/220kV transformer bank at Eldorado Substation. Also, SCE has forecasted a decline in new transmission facilities and expenditures in 2016 and 2017, thereby causing a reduction in the Incremental Forecast Period TRR. Finally, the True Up Adjustment for 2015 is \$95 million which increases the TO11 Base TRR.

As part of the True Up Adjustment, SCE is proposing to correct its authorized True Up TRRs for 2013 and 2014. This correction is reflected in Schedule 3 of the Formula Rate spreadsheet as a One-Time Adjustment that increases the TO11 Base TRR by \$0.743 million. In its TO10 Annual Update, SCE had made certain adjustments to reflect the approval of the San Onofre Nuclear Decommissioning Settlement by the California Public Utilities Commission. In the TO10 Annual Update, SCE did not properly calculate the level of participant billings in those adjustments and the One-Time Adjustment in this filing corrects that error. The derivation of this One-Time Adjustment amount is set forth in the Schedule 3 Workpapers.

# IV. TO11 Draft Annual Update and Documents Submitted With This Filing

SCE's Formula Rate Protocols require SCE to post a Draft Annual Update on SCE's website on or before June 15 of each year. SCE posted the TO11 Draft Annual Update on June 15, 2016.

This filing consists of the following documents:

- 1) This filing letter;
- 2) An attestation by an SCE officer;
- Attachment 1: The populated formula transmission rate, in both pdf and Excel formats, showing the calculation of the TO11 Base TRR and associated rates;
- 4) Attachment 2: Retail and Wholesale Transmission rates to be effective on January 1, 2017;
- 5) Attachment 3: Revisions to formula rate inputs from the TO11 Draft Annual Update; and
- 6) Attachment 4: Workpapers supporting the inputs to Attachment 1, including information required pursuant to the Settlement in Docket No. ER11-1952, the Settlement in Docket No. ER11-3697, and the Formula Rate Protocols.

# V. Service

Copies of this filing have been served on all parties to Docket No. ER11-3697, including the California Public Utilities Commission, as well as the CAISO, and all Participating Transmission Owners in the CAISO. Ms. Kimberly D. Bose, Secretary Federal Energy Regulatory Commission Page 6 December 1, 2016

### VI. Communications

SCE requests that all correspondence, pleadings and other communications

concerning this filing be served upon:

Rebecca Furman Senior Attorney Southern California Edison Company P.O. Box 800 Rosemead, CA 91770 Tel. (626) 302-3475

James A. Cuillier Director, FERC Rates & Regulation Southern California Edison Company P.O. Box 800 Rosemead, CA 91770 Tel. (626) 302-3627

Very truly yours,

# ATTESTATION

Constance J. Erickson attests that she is Vice President and Controller of Southern California Edison Company, and that the cost of service statements and supporting data submitted as a part of this filing which purport to reflect the books of Southern California Edison Company are true, accurate, and current representations of the utility's books and other corporate documents to the best of her knowledge and belief.

> Constance J. Erickson Vice President and Controller

Dated: November XX, 2016