

BEFORE THE  
PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Joint Application of Southern California Edison	)	
Company (U 338-E) and San Diego Gas &	)	
Electric Company (U 902-E) For the 2018	)	Application 18-03-009
Nuclear Decommissioning Cost Triennial	)	(Filed March 15, 2018)
Proceeding.	)	
_____	)	

**ALLIANCE FOR NUCLEAR RESPONSIBILITY'S  
PROTEST**

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Date: April 20, 2018

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## PROTEST

Pursuant to Rule 2.6 of the California Public Utilities Commission (“Commission” or “CPUC”) Rules of Practice and Procedure, the Alliance for Nuclear Responsibility (“A4NR”) respectfully submits its Protest of the Joint Application of Southern California Edison Company (“Edison” or “SCE”) and San Diego Gas & Electric Company (“SDG&E”) for the 2018 Nuclear Decommissioning Cost Triennial Proceeding (“Joint Application”). The Joint Application was filed on March 15, 2018 and first appeared in the Commission’s Daily Calendar on March 23, 2018.

The Joint Application and accompanying testimony provide inadequate support to find reasonable the 2017 Decommissioning Cost Estimate (“DCE”) for San Onofre Nuclear Generating Station Unit 1 (“SONGS 1”) or San Onofre Nuclear Generating Station Units 2&3 (“SONGS 2&3”) due to the likely material impact on both DCEs of assumptions about the timing of removal of subsurface structures and the transfer of spent nuclear fuel to the federal Department of Energy (“DOE”). In each of these two subject areas, the Joint Application and accompanying testimony substitute vague declarative statements for evidence that the underlying factual premise is sound. A4NR expects to conduct discovery and submit testimony that calls into question the reasonableness of the utility assumptions, but will avoid questions of radiological health and safety that are federally preempted under the Atomic Energy Act.<sup>1</sup>

The Joint Application’s cavalier approach is encapsulated in the “Changes in Assumptions” discussion contained at pp. 7 – 8 of SCE-01. Edison invokes a study it

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<sup>1</sup> 42 U.S.C. Chapter 23.

commissioned “to better understand the interaction between coastal processes and SONGS substructures in the future.”<sup>2</sup> This study, completed in August 2017, “predicted greater erosion than expected, causing SCE to re-evaluate certain assumptions about the timing of substructure removal.”<sup>3</sup> No attempt is made to explain this re-evaluation or how delay would avoid or mitigate coastal erosion. The study is not attached to the Joint Application or accompanying testimony, but Edison nonetheless claims justification to slide the substructure work backward by 18 years. Ratepayers who have already paid for full removal of the SONGS subsurface structures, and who rightfully expect greater recreational access to an expanded beach once the site is released back to the Navy, deserve better.

SCE-01 engages in similar sleight of hand in modifying the assumed length of time spent nuclear fuel is expected to remain at SONGS. SCE notes that since the 2012 NDCTP, “no definitive information has emerged regarding the DOE’s opening of a deep geologic repository to which the spent fuel could be transferred from the SONGS site.”<sup>4</sup> Consequently, the 2018 NDCTP slides the assumed repository commencement date from 2024 to 2028 – apparently convinced that, on this subject, four years and six years are sufficiently equivalent – but makes no adjustment whatsoever for the assumed 2049 end date for spent fuel transfers from SONGS. The uncorroborated rationale for why DOE’s continued slippage is of no consequence: “SCE’s assumption that it will be able to arrange exchanges in the DOE’s fuel-loading/acceptance schedule.”<sup>5</sup> With the spate of nuclear plant closures across the country in recent years, how

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<sup>2</sup> SCE-01, p. 8.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*, p. 7.

<sup>5</sup> *Id.*, p. 8.

likely are sufficient volumes of attractive trading opportunities? SCE's nonchalance seems out-of-step with widespread apprehension of an infinite duration for the beachfront waste dump.

A4NR represents the interests of residential and small commercial ratepayers – past, present, and future – in nuclear-related proceedings in California state government. Its paramount objective is to see that responsibility for the costs of nuclear energy is properly assigned, including between different generations of ratepayers. Decommissioning proceedings contemplate distant time horizons and require a heightened awareness of the fiduciary obligations shared by utilities and the Commission in the expenditure of trust proceeds on behalf of ratepayer beneficiaries. A4NR has no objection to the schedule proposed in the Joint Application and looks forward to its participation in the proceeding.

Respectfully submitted,

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