

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation on the Commission's Own Motion into the Rates, Operations, Practices, Services and Facilities of Southern California Edison Company and San Diego Gas and Electric Company Associated with the San Onofre Nuclear Generating Station Units 2 and 3.

Investigation 12-10-013
(Filed October 25, 2012)

And Related Matters.

Application 13-01-016
Application 13-03-005
Application 13-03-013
Application 13-03-014

JOINT MOTION OF THE ALLIANCE FOR NUCLEAR RESPONSIBILITY, THE CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION, CALIFORNIA STATE UNIVERSITY, CITIZENS OVERSIGHT, THE COALITION OF CALIFORNIA UTILITY EMPLOYEES, THE DIRECT ACCESS CUSTOMER COALITION, RUTH HENRICKS, THE OFFICE OF RATEPAYER ADVOCATES, SAN DIEGO GAS AND ELECTRIC COMPANY (U 902 E), SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), THE UTILITY REFORM NETWORK, AND WOMEN'S ENERGY MATTERS TO STAY PROCEEDINGS IN I.12-10-013

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Dated: February 1, 2018

Pursuant to Rule 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission, the Alliance for Nuclear Responsibility (“A4NR”), the California Large Energy Consumers Association (“CLECA”), California State University, Citizens Oversight, the Coalition of California Utility Employees, the Direct Access Customer Coalition (“DACC”), Ruth Henricks, the Office of Ratepayer Advocates (“ORA”), San Diego Gas and Electric Company (“SDG&E”), Southern California Edison Company (“SCE”), The Utility Reform Network (“TURN”), and Women’s Energy Matters (“WEM”) (collectively, the “Joint Parties”) respectfully submit this Joint Motion to Stay Proceedings in I.12-10-013 (the “Joint Motion to Stay”) pending the Commission’s consideration of the Joint Motion for Adoption of Settlement Agreement filed January 30, 2018.

Because the Settlement Agreement would, if approved by the Commission, resolve all issues in the OII, the Commission should stay all further activity and deadlines in the OII pending the Commission’s decision on the Joint Motion for Adoption of Settlement Agreement. In particular, the Joint Parties respectfully request an order approving this Joint Motion to Stay that would accomplish the following:

(1) suspend the schedule of hearings and deadlines in the Scoping Ruling dated January 8, 2018 (“Scoping Ruling”);¹

(2) take off calendar the Status Conference, Public Participation Hearings, Evidentiary Hearings, and Oral Argument scheduled in the Scoping Ruling;²

(3) relieve the Joint Parties of any obligation to file any summaries, testimony, motions, stipulations, and briefs directed in the Scoping Ruling;³ and

(4) relieve the Joint Parties of any obligation to propound or respond to discovery requests in the OII.⁴ Notwithstanding the foregoing, ORA cannot waive its statutory discovery

¹ Ruling of Assigned Commissioner and Administrative Law Judge Setting Schedule and Clarifying Issues for Evidentiary Hearings, at 12-13 (Jan. 8, 2018).

² *Id.* at 12-13, 15.

³ *Id.* at 12-13.

⁴ *Id.* at 8.

rights over any entity regulated by the Commission as provided by the Public Utilities Code (e.g., Pub. Util. Code §§ 309.5, 314).

The Joint Parties do not request a change in the status of the Ex Parte Ban articulated in the Scoping Ruling.⁵

The Joint Parties respectfully request a ruling on this Joint Motion to Stay expeditiously, particularly in light of the February 23, 2018, deadline set by the Scoping Ruling for service of testimony. Pursuant to Rule 11.6, the Joint Parties made a good-faith effort to ask parties whether they have a position on the Joint Motion to Stay through email sent on January 31, 2018, to all parties on the service list. As of the date of filing (February 1, 2018), no party expressed a position on the Joint Motion to Stay.

⁵ *Id.* at 15.

APPENDIX 1

SAN DIEGO GAS & ELECTRIC COMPANY

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