BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emission Standards into Procurement Policies.	)	Rulemaking 06-04-009 (Filed April 13, 2006)

BEFORE THE CALIFORNIA ENERGY COMMISSION

In The Matter Of, AB 32 Implementation – Greenhouse Gas Emissions.	)	Docket 07-OIIP-01

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE'S RULING ENTERING ADDITIONAL INFORMATION INTO THE RECORD AND SEEKING COMMENTS

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Dated: **November 24, 2008**

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Pursuant to the Assigned Commissioner and Administrative Law Judge's Ruling Entering Additional Information into the Record and Seeking Comments, issued October 23, 2008 ("Joint Ruling"), Southern California Edison Company ("SCE") submits these comments regarding SCE's Petition for Modification of Decision ("D.") 07-01-039 ("Petition").

On January 28, 2008, SCE filed the Petition, asking that D.07-01-039, Interim Opinion on Phase 1 Issues: Greenhouse Gas Emissions Performance Standard, be modified to exclude financial contributions required by existing contractual agreements, in light of SCE's obligations at Four Corners Generation Station ("Four Corners"). The California Public Utilities Commission ("Commission") issued a Proposed Decision ("PD") on September 2, 2008, denying SCE's Petition but finding that approximately $178.6 million in Four Corners capital expenditures identified in the SCE General Rate Case ("GRC") testimony attached to the Petition

were exempt from the emissions performance standard ("EPS"). The Joint Ruling withdrew the PD, entered additional information into the record and, among other things, sought comments on the following questions by November 24, 2008:

1. How, if at all, should the PD's original conclusion that the capital expenditures at Four Corners do not fall under the definition of "new ownership investment" change as a result of this new information? Why or why not?
2. Should SCE be allowed to recover any of the requested capital expenditures at Four Corners? Which expenses and why?
3. Are evidentiary hearings necessary and what issues need to be addressed through hearings?

SCE submits that the PD correctly concluded that the Four Corners capital expenditures included in SCE's GRC request are not subject to the EPS. None of the requested Four Corners capital expenditures meet the definition of "new ownership investments" under D.07-01-039, because the expenditures (1) are not designed and intended to extend the life of the Four Corners units by five years or more beyond the term of the current contracts, and (2) do not result in a net increase in the rated capacity of this baseload plant. In further support of this conclusion, SCE has attached to these comments a matrix (Appendix A) of the Four Corners capital projects comprising the $178.6 million sought in SCE's GRC.[1] The matrix shows that each project (and its associated expenditures) does not fit the "new ownership investment" criteria and thus should be exempt from the EPS, consistent with the PD's conclusion.

Although SCE's Petition focused on our contractual obligations to make certain Four Corners capital expenditures, it is also clear that under the most reasonable interpretation of D.07-01-039 the Commission does not even need to reach this issue to determine that the EPS does not apply to the expenditures identified in the GRC.[2] Given the threshold conclusion

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[1] The factual information included in Appendix A (and Appendix B and Appendix D, discussed below), are verified in the declaration of John F. Dayton, attached as Appendix C.

[2] It remains SCE's position that, to the extent SCE is contractually obligated to make capital expenditures at Four Corners, such expenditures should not be subject to the EPS.

mentioned above that expenditures do not fall within D.07-01-039's definition of "new ownership investments," the Commission need not examine to what extent SCE is contractually required to incur the $178.6 million for the identified Four Corners capital projects in order to determine whether the expenditures for those projects should be subject to the EPS. Accordingly, the information cited in the Joint Ruling relating to SCE's contractual obligations does not alter or affect in any way the correctness of the PD's ultimate conclusion on the issue of "new ownership investments." The Commission should therefore issue and adopt a new PD that reaches the same conclusion.

SCE should be allowed to seek recovery (in our GRC) of all of the proposed Four Corners capital expenditures included in the GRC testimony attached to the Petition, because those expenditures are not "new ownership investments." In addition, no evidentiary hearings are needed in this proceeding. With the information in the GRC record and the additional information included in the matrix attached to this response, the Commission has a sufficient record before it to issue a ruling on the applicability of the EPS to the $178.6 million in Four Corners capital expenditures discussed in the GRC, without consuming additional Commission time and resources in hearings.

I.

THE PD WAS CORRECT IN ITS ULTIMATE CONCLUSION THAT THE FOUR CORNERS CAPITAL EXPENDITURES IDENTIFIED IN THE GRC DO NOT FALL WITHIN THE DEFINITION OF "NEW OWNERSHIP INVESTMENTS"

The Joint Ruling requests comments on whether the Commission should change the PD's conclusion that the Four Corners capital expenditures identified in SCE's GRC testimony are outside the definition of "new ownership investments." In D.07-01-039, the Commission defined "new ownership investments" as: "(a) Investments in new baseload powerplant (new construction); (b) Acquisition of new or additional ownership interest in existing baseload powerplant previously owned by others; (c) New investments in the LSE's own existing, non-

CCGT baseload powerplants that: 1) are designed and intended to extend the life of one or more units by five years or more, 2) result in a net increase in the rated capacity of the powerplant, or 3) are designed and intended to convert a non-baseload plant to a baseload plant; or (d) Units added to a deemed-compliant CCGT plant that result in an increase of 50 MW or more to the powerplant's rated capacity."[3] The PD correctly concluded that the capital expenditures discussed in SCE's GRC do not constitute "new ownership investments" because, *inter alia*, they "are to ensure that Four Corners will continue to provide reliable power through the term of the Agreements."[4]

As an initial matter, the Four Corners capital expenditures identified in SCE's GRC testimony do not relate to new powerplant construction or to acquisition of an additional ownership interest, and do not result in an increase of 50 MW or more of the plant's rated capacity. The only relevant inquiry for the Four Corners capital expenditures involves subpart (c) in the above paragraph: whether the new investments in an LSE's own existing non-CCGT baseload powerplant are "designed and intended to extend the life of one or more units by five years or more [or] result in a net increase in the rated capacity of the powerplant."

Although D.07-01-039 does not clearly define the concept of life extension, the most reasonable interpretation is that investments trigger the EPS only if they are designed and intended to extend the life of Four Corners beyond 2016, which is the terminal year of the Four Corners agreements. Investments necessary to keep Four Corners reliably operating until 2016 would not trigger the EPS.[5] The proper inquiry, moreover, is not how long any installed equipment included within any particular capital project might be expected to last, but rather whether the project is needed to enable Four Corners to continue reliably operating until 2016. In other words, the fact that a particular piece of equipment installed in connection with the

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[3] D.07-01-039, at 7.

[4] PD, at 8.

[5] *See* Response of Southern California Edison Company (U 338-E) to Assigned Commissioner and Administrative Law Judge's Ruling Entering Additional Information into the Record and Seeking Comments, filed November 6, 2008, at Appendix A, p. 21.

projects described in SCE's GRC testimony for Four Corners could last beyond 2016 if the facility were to continue to operate past that date would not mean that such an expenditure was intended to extend the life of Four Corners, provided that the project is also necessary to keep Four Corners reliably operating until 2016.

Based on this interpretation of D.07-01-039, which SCE respectfully requests that the Commission affirm at this time, SCE reviewed each of the capital expenditures comprising the $178.6 million forecast in the GRC. To assist the Commission in its review of the PD's conclusion and the information regarding the Four Corners expenditures in this record, SCE has developed a matrix that is attached hereto as Appendix A. SCE's matrix identifies each of the Four Corners capital projects that comprise the $178.6 million discussed in the GRC, provides a brief description of the purpose of each project (including cross-references to the project details found in SCE's GRC testimony and workpapers),[6] and indicates why each project does not meet the relevant three-part test for "new ownership investment" in an LSE-owned resource: the investment (1) is not designed and intended to extend the life of one or more units beyond 2016, (2) does not result in a net increase in the rated capacity of the powerplant, and (3) is not designed and intended to convert a non-baseload plant to a baseload plant.[7]

There is no reason why the additional information cited in the Joint Ruling should affect the Commission's application of the relevant three-part test, and thus it should not prompt any change to the PD's ultimate conclusion that the Four Corners capital expenditures identified in the GRC are not subject to EPS. The information identified in the Joint Ruling relates to SCE's contractual rights and duties with respect to capital expenditures at Four Corners. As discussed

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[6] Pursuant to authorization received from ALJ Yip-Kikugawa, SCE is filing copies of its GRC workpapers under separate cover as Appendix D. Parties may reference these workpapers for more detailed discussions of the capital projects.

[7] SCE has included in the matrix 33 entries for Four Corners projects that have arisen since SCE's GRC Application was submitted in A.07-11-011 in 2007. Some of these additional projects have been completed and are now in service, while others are still underway. Included in SCE's GRC Coal Capital Testimony was a discussion of the fact that capital projects can and do arise on short notice that must be completed before the next GRC cycle. Therefore, SCE included in our Four Corners capital forecast a line item for such "Unallocated Future Projects Units 4&5." The 33 entries relate back to this original line item in SCE's GRC forecast, but appear separately at the end of the matrix so that they can be easily identified.

above, however, the Commission can appropriately determine that the approximately $178.6 million in capital expenditures identified in the GRC do not meet the definition of "new ownership investments" under D.07-01-039's three-part factual test, without determining whether the underlying contract obligates a party to fund the investments. The Commission therefore does not need to reach the issue of whether any particular Four Corners capital expenditures are contractually required in order to uphold the PD's ultimate conclusion that the capital expenditures discussed in the GRC are not subject to the EPS.[8]

The PD's ultimate conclusion that the Four Corners capital expenditures identified in the GRC are not "new ownership investments" subject to the EPS is fully supported by the three-part test of D.07-01-039, irrespective of the additional information relating to SCE's contractual obligations cited in the Joint Ruling. Indeed, the critical inquiry is whether the project is necessary to enable Four Corners to continue reliably operating until 2016. Accordingly, the PD's conclusion should remain unchanged.

II.

SCE SHOULD BE ALLOWED TO PURSUE RECOVERY IN THE GRC OF ALL THE FOUR CORNERS CAPITAL EXPENDITURES REQUESTED IN THE GRC

SCE presumes that the Joint Ruling's question regarding cost recovery is intended to address whether SCE should be permitted to seek recovery of the Four Corners capital expenditures in our 2009 GRC (A.07-11-011). However, the question could be read to ask both (i) should SCE be permitted to seek recovery of the expenditures in A.07-11-011, and (ii) should SCE be authorized to recover the expenditures in A.07-11-011, as reasonable expenditures for the Four Corners facility? SCE submits that part (ii) of the question is beyond the scope of this proceeding, as the reasonableness of the Four Corners capital expenditures discussed in the Petition are being evaluated and decided by the Commission in A.07-11-011 (the 2009 GRC).

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[8] As discussed in Section II below, such expenditures are subject to reasonableness review in SCE's GRC before SCE will be entitled to recover the costs from our customers.

Likely for this reason, the PD stated that the reasonableness of these capital expenditures would be separately decided in SCE's GRC:

> Although we find that the requested capital expenditures are not 'new ownership investments' for purposes of complying with the EPS, we make no determinations concerning the reasonableness or necessity of the requested expenditures. These determinations shall be made in A.07-11-011.[9]

SCE agrees that A.07-11-011 is the correct forum for assessing the reasonableness and necessity of the Four Corners capital expenditures. SCE therefore requests that the Commission continue to undertake that assessment only in A.07-11-011.[10]

With respect to whether SCE should be permitted to seek recovery of the Four Corners capital expenditures in A.07-11-011, we urge the Commission to find that SCE should be permitted to seek recovery of all of the capital expenditures referenced in the GRC testimony because those expenditures do not constitute "new ownership investments" under the Commission's EPS decision. As discussed in Section I above and as seen in the attached matrix (Appendix A), the PD's ultimate conclusion that these expenditures are not "new ownership investments" should remain unchanged. Similarly, SCE's actions to approve proposed capital expenditures at Four Corners since the issuance of D.07-01-039 did not violate that decision, because the expenditures that SCE approved were not "new ownership investments" within the meaning of that decision.[11]

In light of the PD's correct conclusion that the Four Corners capital expenditures do not constitute "new ownership investments" under the EPS and the analysis confirming the PD's findings provided in the attached matrix, SCE should be permitted to seek recovery for each of the Four Corners capital expenditures in A.07-11-011.

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[9] PD, at 2, n.1.

[10] The Commission issued a Proposed Decision and an Alternate Proposed Decision in A.07-01-011 on November 18, 2008, which include findings relating to the reasonableness of SCE's forecast of capital expenditures for the Four Corners plant.

[11] *See* Assigned Commissioner and Administrative Law Judge's Ruling Entering Additional Information into the Record and Seeking Comments, October 23, 2008, at 5-6 (seeking comment on SCE's authority to approve capital expenditures at Four Corners after issuance of D.07-01-039).

III.

EVIDENTIARY HEARINGS ARE NOT NECESSARY BECAUSE THE COMMISSION HAS AN ADEQUATE RECORD FOR ITS DECISION

Evidentiary hearings are not necessary in this proceeding because the Commission has a sufficient record before it to issue a decision on SCE's Petition.

SCE's original Petition contained copies of portions of SCE's Four Corners contracts and 2009 GRC application. SCE responded to the Commission's October 2008 data requests with full copies of contracts and other documents, which have been entered into the record as Attachments A through E to the Joint Ruling. In the interest of providing the Commission with a complete record, SCE is attaching as Appendix B to this filing an updated list of Four Corners Co-Owner Approved Projects to Date.[12] This original list was submitted to the Commission in October of 2008, and was entered into the record as Attachment E to the Joint Ruling.

The Commission has also received a report from Munger, Tolles & Olson LLP regarding its independent review of the Petition, related pleadings, and underlying contracts, which explains the relation of the information identified in the Joint Ruling to the statements in the Petition and finds that the Petition was not misleading. In addition, the current round of comments and reply comments gives all parties the opportunity to comment on the information added to the record through the Joint Ruling. Evidentiary hearings would be time-consuming, expensive, and an unnecessary burden on the Commission's resources. The Commission has an adequate record before it with which to make its decision, based on SCE's Petition, these comments, and all the documents already entered into the record.

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[12] Certain recently-approved projects were inadvertently omitted from the October 2008 table. The updates are reflected in Appendix B. In addition, certain dates of project approval have been updated in Appendix B based on new information received from Arizona Public Service, the Four Corners Operating Agent.

SCE therefore respectfully requests that, upon completion of this comment cycle, the Commission issue a new proposed decision on SCE's Petition with no change to the PD's ultimate conclusion that the Four Corners capital expenditures discussed in the GRC do not constitute "new ownership investments" under D.07-01-039.

IV.

CONCLUSION

For the reasons discussed above, SCE respectfully recommends that the Commission 1) issue a new PD that concludes that the capital expenditures at Four Corners included in SCE's GRC rate recovery request do not fall under the definition of "new ownership investment," and that the crucial inquiry is whether the expenditures were necessary to keep the plant operating through its contract life; 2) permit SCE to seek rate recovery in the GRC for the capital expenditures at Four Corners; and 3) find that evidentiary hearings are not necessary.

Respectfully submitted,

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November 24, 2008

Appendix A

ATTACHMENT A
FOUR CORNERS CAPITAL FORECAST 2007-2011
NOV. 24, 2008

Owner Approval Status	GRC id	GRC id	GRC id	APS Work Order	Capital Project	Purpose of Project	Basis for EPS Non-Applicability	SCE GRC Page References Direct Testimony	SCE GRC Page References Work Papers
pre Jan07	R	1		06-08	HP TURBINE & CONTROLS REPL, U 5	Replaces & Upgrades Deteriorated Turbine Components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	(1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. Project restores and improves Unit MW gross output to approx. 815 MW from prior approx. 795 MW (generator nameplate rating is 818 MW). (3) The plant is already a base load plant.	14	33
pre Jan07	R	2		07-05R0	HP TURBINE & CONTROLS REPL, U 4	Replaces & Upgrades Deteriorated Turbine Components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	(1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. Project restores and improves Unit MW gross output to approx. 815 MW from prior approx. 795 MW (generator nameplate rating is 818 MW). (3) The plant is already a base load plant.	16	60
Pending	R	3		PWEE	MINOR OVERHAUL TURB REPAIRS, U 5	Replaces & Upgrades Deteriorated Turbine Components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	**[For the remainder of this matrix, the symbol *** denotes content identical to the information in this field.]** (1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. (3) The plant is already a base load plant.	17	239
09-16	R	4		PWEE	HP GENERATOR FIELD REWIND, U 4	Replaces Deteriorated Generator Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	17	197
pre Jan07	R	5		06-05	LOWER BOILER REPLACEMENT, U 5	Replaces Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	18	27
pre Jan07	R	6		06-06	PENDANT RH & OUTLET HEADER REPL, U 5	Replaces Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	23	29
pre Jan07	R	7		07-04R0	PENDANT RH & OUTLET HEADER REPL, U 4	Replaces Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	24	58
pre Jan07	R	8		06-07	2ND STAGE PENDANT SUPHTR REPL, U 5	Replaces Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	24	31
Pending	R	9		PWEE	1ST STAGE PENDANT SUPHTR REPL, U 5	Replaces Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	26	240
pre Jan07	R	10		07-06R0	2ND STAGE PENDANT SUPHTR REPL, U 4	Replaces Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	27	61
Pending	R	11		PWEE	HORIZONTAL REHEAT BANK REPL, U 5	Replaces Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	27	241

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Owner Approval Status	GRC id	GRC id	GRC id	APS Work Order	Capital Project	Purpose of Project	Basis for EPS Non-Applicability	SCE GRC Page References Direct Testimony	SCE GRC Page References Work Papers
Pending	R	12		PWEE	BOILER NOSE REPLACEMENT, U 4	Replaces Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	27	198
Pending	R	13		PWEE	BOILER NOSE REPLACEMENT, U 5	Replaces Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	28	242
pre Jan07	R	14		05-04R1	MAIN FLAME SCANNER UPGRADE, U 5	Replaces and Upgrades Unreliable Boiler Component to sustain plant Reliability and Safety for remaining duration of existing contracts governing plant ownership.	***	28	17
09-05	R	15		PWEE	AIR PREHEATER H/C BASKET REPL, U 4	Replaces Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	(1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. Project may, however, result in the recovery of a minor amount of capacity, but will not increase capacity beyond nameplate. (3) The plant is already a base load plant.	30	199
pre Jan07	R	16		07-08	COAL PIPE REPL, U 5	Replaces Deteriorated Coal Fuel Handling components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	31	66
09-04	R	17		PWEE	COAL PIPE REPL, U 4	Replaces Deteriorated Coal Fuel Handling components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	31	200
Pending	R	18		PWEE	HP FEEDWATER HEATER REPL, U 4	Replaces Deteriorated Boiler Feedwater component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	(1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. Project may, however, result in the recovery of a minor amount of capacity, but will not increase capacity beyond nameplate. (3) The plant is already a base load plant.	32	201
Pending	R	19		PWEE	PULVERIZER CAPACITY UPGRADE, U 4	Refurbishes and Upgrades Deteriorated Coal fuel handling components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	32	202
pre Jan07	R	20		05-13	GSU TRANSFORMER T633 & T634 REPL, U 5	Replaces Deteriorated Transformers to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	33	23
pre Jan07	R	21		06-09R1	GSU TRANSFORMER T631 REPL, U 4	Refurbished Deteriorated Spare Transformer to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	34	35
08-04	R	22		PWEE	GSU TRANSFORMER T629 REPL, U 4	Replaces Deteriorated Transformer to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	34	203
Pending	R	23		PWEE	UNDERGROUND CABLE REPLACEMENTS	Replaces Deteriorated Electrical Cables to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	35	152
08-18	R	24		PWEE	PLANT PERIMETER SECURITY UPGRADE	Upgrades Plant Security in accordance with NERC security standards governing power grid Reliability, to assure regulatory compliance for remaining duration of existing contracts governing plant ownership.	***	35	204

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Owner Approval Status	GRC id	GRC id	GRC id	APS Work Order	Capital Project	Purpose of Project	Basis for EPS Non-Applicability	SCE GRC Page References Direct Testimony	SCE GRC Page References Work Papers
09-25	R	25		PWEE	COMPUTER PREDICTIVE/PERF TOOLS	Upgrades Plant Operations and Maintenance Data Analysis Capabilities to sustain the Reliability of this aging plant for remaining duration of existing contracts governing plant ownership.	***	36	153
Pending	R	26		PWEE	BOTTOM ASH CONTROLS REPL, U 4&5	Replaces and Upgrades Deteriorated Plant Control System components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	36	165
Pending	R	27		PWEE	**UNALLOCATED FUTURE PROJECTS U4&5**	**Funds Additional Projects expected to arise during 2009-2011 which had not yet been identified at the time the SCE 2009 GRC Capital Forecast was prepared in mid-2007. To date, 33 such projects have arisen and are therefore identified at the bottom of this list.**		37	none
pre Jan07	R	28	1	07-11	AIR PREHEATER H/C BASKET REPL, U 5	Replaces Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	(1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. Project may, however, result in the recovery of a minor amount of capacity, but will not increase capacity beyond nameplate. (3) The plant is already a base load plant.	39	72
pre Jan07	R	28	2	07-19	GEN PROT RELAY REPLACEMENT, U 5	Replaces and Upgrades Deteriorated Generator Protective Device to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	86
08-08	R	28	3	PWEE	IP TURBINE BLADE REPLACEMENT, U 5	Replaces Deteriorated Turbine Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	(1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. Project may, however, result in the recovery of a minor amount of capacity, but will not increase capacity beyond nameplate. (3) The plant is already a base load plant.	39	138
pre Jan07	R	28	4	07-13	LP GENERATOR FIELD REWIND, U 5	Replaces Deteriorated Generator Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	76
Pending	R	28	5	PWEE	REHEAT ISOLATION VALVES, U 5	Facilitates Detection and Repair of Boiler Tube Leaks to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	139
pre Jan07	R	28	6	07-22	SUPERHEAT ATTEMPERATOR REPL, U 5	Replaces and Upgrades Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	92
09-08	R	28	7	PWEE	FD FAN MOTOR REPL, U 4	Replaces Deteriorated Spare Motor to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	205
09-18	R	28	8	PWEE	GEN PROT RELAY ADDITION, U 4	Replaces and Upgrades Deteriorated Generator Protective Device to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	206

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Owner Approval Status	GRC id	id	id	APS Work Order	Capital Project	Purpose of Project	Basis for EPS Non-Applicability	SCE GRC Page References Direct Testimony	Work Papers
09-13	R	28	9	PWEE	IP TURBINE BLADE REPL, U 4	Replaces Deteriorated Turbine Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	(1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. Project may, however, result in the recovery of a minor amount of capacity, but will not increase capacity beyond nameplate. (3) The plant is already a base load plant.	39	207
09-17	R	28	10	PWEE	LP GENERATOR REWEDGE, U 4	Refurbishes Generator to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	208
09-12	R	28	11	PWEE	LP TURBINE BLADE REPL, U 4	Replaces Deteriorated Turbine Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	(1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. Project may, however, result in the recovery of a minor amount of capacity, but will not increase capacity beyond nameplate. (3) The plant is already a base load plant.	39	209
09-09	R	28	12	PWEE	REHEAT ISOLATION VALVES, U 4	Facilitates Detection and Repair of Boiler Tube Leaks to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	210
Pending	R	28	13	PWEE	SBAC MOTOR REPL, U 4	Replace Deteriorated Soot Blower Compressor Motor to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	211
pre Jan07	R	28	14	07-21	AUX TURBINE OIL FILTRATION SYS, U 4&5	Upgrades Turbine Controls and Lubrication System to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	90
pre Jan07	R	28	15	06-22R1	HYDROGEN GENERATOR INSTALLATION, U 4&5	Upgrade Generator Hydrogen supply/storage system, to mitigate against forecast Hydrogen supply disruptions, to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	48
pre Jan07	R	28	16	07-25	MAIN TURBINE OIL FILTRATION SYSTEM, U 4	Upgrades Turbine Controls and Lubrication System to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	98
pre Jan07	R	28	17	07-23	REDUNDANT STATOR WATER FLOW MONITOR, U 4&5	Upgrades Generator Cooling Monitoring System to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	94
Pending	R	28	18	PWEE	COAL SAMPLER CONTROLS REPL	Replaces Deteriorated Coal Fuel Handling components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	243
Pending	R	28	19	PWEE	COAL HANDLING CONTROLS REPL, U 4&5	Replaces Deteriorated Coal Fuel Handling components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	244
Pending	R	28	20	PWEE	COAL HANDLING REDUNDANT PWR, PHASE II, U 4&5	Upgrades Coal Fuel Handling component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	245
pre Jan07	R	28	21	06-14R1	COAL HNDLG REDUNDANT POWER SUPPL, U 4&5	Upgrades Coal Fuel Handling components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	41

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pre Jan07	R	28	22	06-10	MAIN FLAME SCANNER UPGRADE, U 4	Replaces and Upgrades Unreliable Boiler Component to sustain plant Reliability and Safety for remaining duration of existing contracts governing plant ownership.	***	39	37
09-24	R	28	23	PWEE	DCS ANALOG MASTER MODULE REPL, U 4	Replaces and Upgrades Deteriorated plant Control System component to sustain Plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	212
Pending	R	28	24	PWEE	DCS FIRMWARE UPGRADE	Upgrades Plant Control System to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	154
09-24	R	28	25	PWEE	DCS POWER SUPPLY REPL, U 4	Replaces Deteriorated Plant Control System components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	213
pre Jan07	R	28	26	07-32	FIBER OPTIC CABLE UPGRADE	Upgrades Plant Communication System to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	113
09-33	R	28	27	PWEE	LAN SWITCH UPGRADE	Upgrades Plant Communication System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	155
pre Jan07	R	28	28	07-40	AUX STEAM 3110B VALVE REPL, U 4	Replaces Deteriorated Plant Auxiliary Steam System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	129
pre Jan07	R	28	29	07-42	AUX STEAM 3110B VALVE REPL, U 5	Replaces Deteriorated Plant Auxiliary Steam System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	133
09-27	R	28	30	PWEE	4KV SWITCHGEAR PROT RELAY REPL, U 4	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	214
pre Jan07	R	28	31	06-18	ATB BREAKER REPL, 345KV SWYD	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	42
pre Jan07	R	28	32	07-37	ATB BREAKER REPL, PHASE II, 345KV SWYD	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability and Safety for remaining duration of existing contracts governing plant ownership.	***	39	123
pre Jan07	R	28	33	07-39	FC1222 230 KV BREAKER, SWYD	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	127
pre Jan07	R	28	34	07-38	FC556 & 652 500 KV BREAKER, SWYD	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability and Safety for remaining duration of existing contracts governing plant ownership.	***	39	125
Pending	R	28	35	PWEE	SWITCHYARD RELIABILITY UPGRADE, U 4&5	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability and Safety for remaining duration of existing contracts governing plant ownership.	***	39	156
Pending	R	28	36	PWEE	SWITCHYARD UPGRADES DUE TO BHP	Upgrade Plant Electrical System to sustain Reliability of Coal Supply System for remaining duration of existing contracts governing plant ownership.	***	39	166
09-32	R	28	37	PWEE	CONSTR TRANSFORMER SUBSTA REBUILD	Refurbishes Deteriorated Plant Electrical System components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	167
pre Jan07	R	28	38	07-17	RESERVE TRANSF BREAKER ADDITION, U 4&5	Upgrades Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	82

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pre Jan07	R	28	39	02-19R1	#4 XFMR T541 REPL, SWYD	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	13
pre Jan07	R	28	40	07-41	345/500 KV XFMR BUSHING REPL	Replaces Aging Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	131
Pending	R	28	41	PWEE	345/230 KV XFMR BUSHING REPL, 230/345	Replaces Aging Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	131
Pending	R	28	42	PWEE	AUX TRANSFORMER SPARE, U 4&5	Replace Deteriorated Spare Transformer to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	169
Pending	R	28	45	PWEE	RIVER STATION XFMR BUSHING REPL	Replaces Aging Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	131
08-11	R	28	46	PWEE	TYPE U XFMR BUSHING REPL, U 4&5	Replaces Aging Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	131
pre Jan07	R	28	47	06-03	VEHICLE 2006 4C, 1/2 TON PICK-UP	Maintains Reliability/Functionality of Plant Vehicle Fleet to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	25
pre Jan07	R	28	48	07-02	NEW & REPL TOOLS, 2007	Maintains Reliability/Functionality of Plant Tooling to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	52
09-02	R	28	49	PWEE	NEW & REPL TOOLS, AFTER 2007	Maintains Reliability/Functionality of Plant Tooling to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	151
Pending	R	28	50	PWEE	OPERATOR HANDHELD READER TOOL SYS	Upgrades Functionality of Plant Tooling to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	141
pre Jan07	R	28	51	07-03	VEHICLE REPL, 2007	Maintains Reliability/Functionality of Plant Vehicle Fleet to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	54
09-03	R	28	52	PWEE	VEHICLE REPL, AFTER 2007	Maintains Reliability/Functionality of Plant Vehicle Fleet to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	157
pre Jan07	R	28	53	05-06	AIR COMPRESSOR VSI, U 4&5	Install Air Compressor Condition Monitoring equipment (vibration supervisory instrumentation) to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	21
pre Jan07	R	28	54	07-35	PBX UPGRADE	Upgrades Plant Communication System to sustain plant Reliability and Worker Safety for remaining duration of existing contracts governing plant ownership.	***	39	119
Pending	R	28	55	PWEE	WAN UPGRADE	Upgrades Plant Data Communication System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	142
Pending	R	28	56	PWEE	MICROWAVE/PHONE SYSTEM UPGRADE	Upgrades Plant Communication System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	170

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pre Jan07	R	28	57	03-04	TRAINING FACILITY	Facilitate training of apprentices, hired to replace baby-boomer generation retirements, to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	15
Pending	R	28	58	PWEE	U4&5 MAINTENANCE BUILDING UPGRADE	Enlarges Plant Maintenance Building, commensurate with increased maintenance required due to added equipment for air pollution control and plant waste handling, to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	246
pre Jan07	R	28	59	06-01	MISC CAP, ENGR ELECTRONIC FILING COMMON	Funds Various Small Capital Projects to Maintain Plant Facilities to sustain plant Reliability for the remaining duration of existing contracts governing plant ownership.	***	39	24
pre Jan07	R	28	60	07-18	BOILER MAINT TRACKING SOFTWARE, U 4&5	Upgrades Plant Maintenance Data Analysis Capabilities to sustain the Reliability of this aging plant for remaining duration of existing contracts governing plant ownership.	***	39	84
pre Jan07	R	28	61	07-33	DATA HISTORIAN REPL	Upgrades Plant's Computerized Data Storage, Retrieval and Analysis Capabilities to sustain the Reliability of this aging plant for remaining duration of existing contracts governing plant ownership.	***	39	115
Pending	R	28	62	PWEE	ELECTRONIC DOCUMENTATION UPGRADE	Upgrades Plant Document Storage, Retrieval and Analysis Capabilities to sustain the Reliability of this aging plant for remaining duration of existing contracts governing plant ownership.	***	39	158
pre Jan07	R	28	63	07-31R0	MAXIMO SOFTWARE UPGRADE	Updates Plant's Computerized Maintenance Work Management System Software to sustain plant maintenance effectiveness and productivity for the remaining duration of existing contracts governing plant ownership.	***	39	111
Pending	R	28	64	PWEE	PERFORMANCE MONITORING SYSTEM	Upgrades Plant Operations Data Trending and Analysis Capabilities to sustain the Reliability of this aging plant for remaining duration of existing contracts governing plant ownership.	***	39	143
pre Jan07	R	28	65	07-28	PLANT RTU REPLACEMENT, U 4&5	Replaces Deteriorated Plant Control System components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	104
pre Jan07	R	28	66	07-29	SMARTSIGNAL PRED COND MONITOR	Upgrades Plant Equipment Condition Monitoring System to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	106
pre Jan07	R	28	67	07-20	STATOR LEAK MONITORING SYS, U 4&5	Upgrades Generator Monitoring System to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	88
pre Jan07	R	28	68	07-01	MISC CAP EXPEND, 2007 COMMON	Funds Various Small Capital Projects to Maintain Plant Facilities to sustain plant Reliability for the remaining duration of existing contracts governing plant ownership.	***	39	50
pre Jan07	R	28	69	07-24	B INDUCED DRAFT FAN VSI REPL, U 4&5	Replace Deteriorated Fan Condition Monitoring equipment (vibration supervisory instrumentation) to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	96
09-07	R	28	70	PWEE	SPARE CIRC WATER PUMP MOTOR, U 4&5	Funds purchase of Spare Motor to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	39	171

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Pending	E	1		PWEE	OVERFIRE AIR NOX ABATEMENT U5	Modifies Boiler Fuel Combustion System to Comply with forecast future revisions to Air Pollution Permit/Regulations to allow continued operation of plant for the remaining duration of existing contracts governing plant ownership. Scope and timing of regulatory/air permit revisions is still not certain.	***	44	172
08-07	E	2		PWEE	OVERFIRE AIR NOX ABATEMENT U4	Modifies Boiler Fuel Combustion System to Comply with forecast future revisions to Air Pollution Permit/Regulations to allow continued operation of plant for the remaining duration of existing contracts governing plant ownership. Scope and timing of regulatory/air permit revisions is still not certain.	***	45	215
Pending	E	3		PWEE	DYNAMIC CLASSIFIER MODIFICATION, U 4	Modifies Boiler Fuel Combustion System to Comply with forecast future revisions to Air Pollution Permit/Regulations to allow continued operation of plant for the remaining duration of existing contracts governing plant ownership. Also improves plant fuel efficiency. Scope and timing of regulatory/air permit revisions is still not certain.	***	45	216
Pending	E	4		PWEE	DYNAMIC CLASSIFIER MODIFICATION, U 5	Modifies Boiler Fuel Combustion System to Comply with forecast future revisions to Air Pollution Permit/Regulations to allow continued operation of plant for the remaining duration of existing contracts governing plant ownership. Also improves plant fuel efficiency. Scope and timing of regulatory/air permit revisions is still not certain.	***	46	247
pre Jan07	E	5		07-07R0	SO2 CONTROLS REPL, U 5	Replaces and Upgrades Deteriorated Control System on plant Air Pollution Scrubbers, in order to sustain plant operation in compliance with air permits/regulations, for the remaining duration of existing contracts governing plant ownership.	***	46	64
09-23	E	6		PWEE	SO2 CONTROLS REPL, U 4	Replaces and Upgrades Deteriorated Control System on plant Air Pollution Scrubbers, in order to sustain plant operation in compliance with air permits/regulations, for the remaining duration of existing contracts governing plant ownership.	***	48	217
09-20	E	7		PWEE	SCRUBBER OUTLET DUCT LINER REPL, U 4	Replaces Deteriorated Component on Plant Air Pollution Control System to sustain system operability as needed to comply with Air Permit pollution limits.	***	49	218
pre Jan07	E	8		07-09	BAGHOUSE DUST SUPPRESSION, U 4&5	Construct Baghouse Dust Suppression System, in order to facilitate compliance with the Plant's new air pollution permit.	***	49	68
pre Jan07	E	9		07-10R0	BAGHOUSE TURNING VANES REPL, U 5	Replace and Upgrade Deteriorated Baghouse Turning Vanes, in order to sustain compliance with the Plant's new air pollution permit, for the remaining duration of existing contracts governing plant ownership.	***	51	70
pre Jan07	E	10		06-20R2	ASH LANDFILL AND HAUL ROAD, U 4&5 Phase 1	Construct New Ash Landfill and Haul Road on Plant site, as existing disposal site fills to capacity, to allow continued disposal of plant dry ash wastes at least cost for the duration of existing contracts governing plant ownership.	***	51	44
Pending	E	11		PWEE	DRY ASH LAND FILL, U 4&5 Phase 2	Expand Ash Landfill on Plant site, as existing disposal site fills to capacity, to allow continued disposal of plant dry ash wastes at least cost for the duration of existing contracts governing plant ownership.	***	52	248

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09-22	E	12		PWEE	FLY ASH BENEFICIATION AREA IMPROV, U 4&5	Increases percentage of Plant Ash Waste that can be Sold as a Concrete Additive, reducing size of new ash landfills that station must construct as existing landfills reach capacity over remaining duration of existing contracts governing plant ownership.	***	52	173
pre Jan07	E	13		06-21	THICK UNDERFL TO LINED ASH IMPOUND, U 4-5	Modifies existing Air Pollution Scrubber waste processing equipment, commensurate with recent increase in Plant Air Pollution (i.e., SOX) capture requirements, and increased costs of landfilling dry wastes, in order to facilitate continued legal disposal of plant ash wastes for the remaining duration of existing contracts governing plant ownership.	***	53	46
09-21	E	14		PWEE	5268' LIFT LINED ASH IMPOUNDMENT, U 4-5	Construct New Lined Ash Impoundment, as existing impoundment fills to capacity, in order to allow continued legal disposal of plant slurry wastes (wet ash and scrubber sludge), for the duration of existing contracts governing plant ownership.	***	54	249
Pending	E	15		PWEE	WASTE PROCESSING SYSTEM IMPROV, U 4&5	Replaces and Upgrades Plant Waste Processing System Control System to facilitate continued processing of plant wastes for remaining duration of existing contracts governing plant ownership.	***	55	174
Pending	E	16		PWEE	INTAKE STRUCTURE MODIFICATIONS, U 4&5	Modify Plant Water Intake Structure to comply with new regulations.	***	57	144
Pending	E	17		PWEE	RIVER STATION 316B REG MODIF	Modify Plant Water Intake Structure to comply with new regulations.	***	57	250
pre Jan07	E	18	1	07-15	MERCURY CEMS, U 4&5	Install a Mercury Air Pollution Monitoring System, as required by the Plant's new air pollution control permit.	***	57	80
Pending	E	18	2	PWEE	SO2 PROCESS IMPROVEMENTS, U 4&5	Upgrade Plant Air Pollution Scrubber commensurate with increased air pollution removal required by the Plant's New Air Pollution Permit.	***	57	251
pre Jan07	E	18	3	06-11	STACK FLOW MEASUREMENT REPL, U 4&5	Upgrades Plant Air Pollution Monitoring System to assure compliance with air pollution measurement and reporting requirements for remaining duration of existing contracts governing plant ownership.	***	57	39
Pending	E	18	4	PWEE	BAGHOUSE MAINTENANCE BLDG, U 4&5	Replace deteriorated baghouse maintenance building to facilitate ongoing compliance with plant air pollution control requirements.	***	57	145
08-09	E	18	5	PWEE	ABSORBER MODULE BLOW DOWN MODIF, U4	Upgrade Plant Air Pollution Control System Component in order to facilitate ongoing compliance with air pollution control requirements.	***	57	146
08-09	E	18	6	PWEE	ABSORBER MODULE BLOW DOWN MODIF, U5	Upgrade Plant Air Pollution Control System Component in order to facilitate ongoing compliance with air pollution control requirements.	***	57	219
Pending	E	18	7	PWEE	U4&5 SO2 CONTROL BUILDING REMODEL	Upgrade Plant Air Pollution Control System Maintenance Facilities in order to facilitate ongoing compliance with air pollution control requirements.	***	57	252
Pending	E	18	8	PWEE	DEW POINT MONITORING EQUIP REPL, U 4&5	Install Instrumentation to facilitate compliance with Stack Opacity Limits in Plant's New Air Pollution Permit, and also helps to prevent moisture damage to plant smoke stack.	***	57	176
pre Jan07	E	18	9	07-36	EPA EDR SOFTWARE UPGRADE	Modify Plant Air Emissions Monitoring System computer operating system as required by new regulations.	***	57	121

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Pending	E	18	10	PWEE	HUMATE SILO & SLAKING EQUIP, U 4&5	Upgrades Plant Air Pollution Scrubbing Equipment to reduce NOX and Mercury pollution, in anticipation of further reductions being required by regulatory changes.	***	57	177
pre Jan07	E	18	11	07-14	WASTE PROCESSING CONTROLS REPL, U 4&5	Replace and Reconfigure Control System for the Existing Plant Air Pollution Scrubber Sludge Processing and Disposal System, commensurate with changes to the sludge treatment and disposal process, in order to assure continued legal disposal of plant wastes, for the duration of the existing contracts governing plant ownership.	***	57	78
08-14	E	18	12	PWEE	ASH POND 6 CLOSURES	Funds legally compliant closure of ash/sludge disposal ponds which have been filled to capacity.	***	57	159
pre Jan07	E	18	13	07-12R0	5258' LIFT LINED ASH IMPOUNDMENT, U 4&5	Construct New Lined Ash Impoundment, as existing impoundment fills to capacity, in order to allow continued legal disposal of plant slurry wastes (wet ash and scrubber sludge), for the duration of existing contracts governing plant ownership.	***	57	74
Pending	E	18	14	PWEE	THICKENER AUTOMATIC POLYMER INJECT, U 4&5	Upgrades Plant Waste Processing System commensurate with other changes being made to this system associated with the Plant's New Air Permit and with changes to plant's landfill and sludge waste disposal challenges.	***	57	178
Pending	E	18	15	PWEE	HYDROBIN AREA UPGRADE, U 4&5	Upgrades Plant Waste Processing System commensurate with other changes being made to this system associated with the Plant's New Air Permit and with changes to plant's landfill and sludge waste disposal challenges.	***	57	179
09-30	E	18	16	PWEE	NPDES HAUL ACCESS ROAD	Modify Plant Roadway System in order to facilitate compliance with Plant's New Air Pollution Permit Fugitive Dust control requirements.	***	57	147
pre Jan07	E	18	17	07-30	POND CHLORIDES CONTROL UPGRADES	Provides an Alternative Process and Equipment to manage Air Pollution Scrubber System Chloride Levels, given the deterioration of the existing evaporation ponds, in order to sustain air pollution scrubbing system performance for the duration of existing contracts governing plant ownership.	***	57	108
09-29	E	18	18	PWEE	NPDES DECANT CELL UPGRADES	Upgrades Plant waste handling system to facilitate compliance with Fugitive Dust Emissions limits in Plant's New Air Permit.	***	57	220
08-19	E	18	19	PWEE	500KV YARD STEP-UP TRANSF OIL BERM, U 4&5	Construct Oil Spill mitigation measures to facilitate Fire Mitigation and compliance with oil spill regulations.	***	57	148
pre Jan07	E	18	20	07-26	SPCC CONTAIN OF OIL TANKS, U 4&5	Construct Oil Spill mitigation measures to facilitate compliance with regulations.	***	57	100
Pending	S	1		PWEE	PLANT FIRE WTR UNDGRND PIPE REPL	Replace Deteriorated Fire Water System Component to sustain plant worker Safety.	***	59	160
Pending	S	2		PWEE	POTABLE WATER SYSTEM REPL	Replace deteriorated plant potable water system to sustain worker safety.	***	60	253
pre Jan07	S	3		05-05R1	GSU & AUX XFMR FIRE WALL/OIL CONTAIN, U 4&5	Upgrade Plant's Fire Mitigation provisions to sustain plant Safety and Reliability for remaining duration of existing contracts governing plant ownership.	***	61	19
Pending	S	4		PWEE	HIGH ENERGY PIPING, U 4	Replace Deteriorated Steam Piping to sustain plant worker safety.	***	61	221
pre Jan07	S	5		07-34	LAYDOWN YARD LIGHTING	Improve Plant Lighting to sustain plant worker safety.	***	61	117

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pre Jan07	S	6		07-27	COLD REHEAT #2 PIPE SUPPORT, U 5	Upgrade Plant Piping System component to sustain plant worker safety.	***	61	102
THE FOLLOWING PROJECTS REFLECT THE "UNALLOCATED FUTURE PROJECTS" MENTIONED ABOVE AND HAVE SINCE BEEN IDENTIFIED AS CAPITAL PROJECTS SINCE THE TIME OF THE									
postGRC	R	N	1	07-44	LP TURB 4TH STAGE BUCKET REPL, UNIT 5	Replaces Failed Turbine Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	(1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. Project may, however, result in the recovery of a minor amount of capacity, but will not increase capacity beyond nameplate. (3) The plant is already a base load plant.	none	none
postGRC	R	N	2	07-45	LP TURB A&B 4TH STAGE BUCKET REPL, UNIT 4	Replaces Deteriorated Turbine Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	(1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. Project may, however, result in the recovery of a minor amount of capacity, but will not increase capacity beyond nameplate. (3) The plant is already a base load plant.	none	none
postGRC	R	N	3	08-01	MISC CAP EXPEND, 2008, COMMON	Funds Various Small Capital Projects to Maintain Plant Facilities to sustain plant Reliability for the remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	4	08-05	LP (A) TURBINE BUCKET REPLACEMENT, U5	Replaces Deteriorated Turbine Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	(1) This project is not designed or intended to extend the life of one or more generating units beyond the remaining duration of existing contracts governing plant ownership. (2) This project does not increase the generator nameplate capacity of the plant. Project may, however, result in the recovery of a minor amount of capacity, but will not increase capacity beyond nameplate. (3) The plant is already a base load plant.	none	none
postGRC	E	N	5	08-06	COAL SYS TRIPPER DECK DUST ELIMIN, 4&5	Install two Dust Collectors to eliminate Fugitive Dust to facilitate compliance with the Plant's New Air Permit.	***	none	none
postGRC	E	N	6	08-10	COAL BELT DUST ELIMINATION, 4&5	Install a Spray System to mitigate Fugitive Dust to facilitate compliance with the Plant's New Air Permit.	***	none	none
postGRC	R	N	7	08-12	TURB TWIP & EXTRACTION UPGRADE, U5	Replaces & Upgrades Deteriorated Turbine Components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	8	08-13	UNDERGRND COOLING WATER SYSTEMS, 4&5	Replaces Deteriorated underground Cooling water piping to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	9	08-15	HOGBACK SUB U TYPE BUSHING REPL, COM	Replaces and Upgrades Deteriorated Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	10	08-16	PLANT RADIO UPGRADE, COM	Replaces and Upgrades Plant Radio Systems in order to meet Federal Communication Commission requirements.	***	none	none
postGRC	R	N	11	08-20	LWI Canal Crossing Reroute & Replacement	Replaces Deteriorated Plant Piping System component to sustain plant Reliability and avoid future NPDES violations for remaining duration of existing contracts governing plant ownership.	***	none	none

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postGRC	R	N	12	08-21	500kV Breaker Replacement, 345/500 kV Swyd	Replaces Deteriorated Plant Electrical component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	13	08-22R0	XFMR T627 REPL, 4C 345/500KV (ALLOC 7)	Replaces Deteriorated Transformer to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	14	08-23	XFMR 1AA DGA Monitors, 345/500 kV Swyd	Install Monitors on aging Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	15	08-24	Data Communications Link	Replace existing ground cable with wireless data link to reduce telecom costs.	***	none	none
postGRC	R	N	16	09-01*	MISC CAP EXPEND, 2009	Funds Various Small Capital Projects to Maintain Plant Facilities to sustain plant Reliability for the remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	S	N	17	09-06R0*	O2 DECK HOIST STRUCTURE, 4&5	Modify existing O2 Deck Monorail Craneway to improve plant Safety and Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	18	09-10*	SUPERHEATER ATTEMPERATOR REPL, 4	Replaces and Upgrades Deteriorated Boiler Component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	19	09-11*	BOILER WATER PARTICLE MONITORING, 4&5	Replaces & Upgrades Deteriorated Corrosion monitoring system to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	20	09-14*	TURBINE TWIP & EXTRACTION UPGDE, 4	Replaces & Upgrades Deteriorated Turbine Components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	21	09-15*	TURBINE SUPERVISORY INSTRUMENTATION REPL, 4	Replaces Main Turbine Supervisory Instrumentation System to improve performance and sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	E	N	22	09-19*	BAGHOUSE TURNING VANES REPL, 4	Replace and Upgrade Deteriorated Baghouse Turning Vanes, in order to sustain compliance with the Plant's new air pollution permit, for the remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	23	09-26*	AUX TURBINE PROTECTION UPGRADE, 4	Replaces and Upgrades Aux Turbine Control System to improve performance and sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	24	09-28*	TURBINE ENCLOSURE BRIDGE CRANE CONTROLS UPGDE, 4&5	Replaces Deteriorated Turbine Enclosure Bridge Crane Controls to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	25	09-31*	RIVERSTATION SWRG & MCC REPL	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	26	09-34*	VIDEO SCOPE REPL	Replaces Deteriorated video equipment used for troubleshooting Plant components to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	27	09-35*	#8 XFMR T542 REPL, 4C 230/345KV (ALLOC 2)	Replaces Deteriorated Transformer to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none

FOUR CORNERS CAPITAL FORECAST 2007-2011
NOV. 24, 2008

Owner Approval Status	GRC id	id	id	APS Work Order	Capital Project	Purpose of Project	Basis for EPS Non-Applicability	SCE GRC Page References: Direct Testimony	SCE GRC Page References: Work Papers
postGRC	R	N	28	09-36*	TRANSFORMER PROT RELAY ADDN, 4C 230/345KV	Upgrades Plant Electrical System component to improve plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	29	09-37*	500 KV CCVT REPL, 4C 500KV (ALLOC 4)	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	30	09-38*	DIGITAL FAULT RECORDER REPL, 4C 345 SWYD	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	31	09-39*	DIGITAL FAULT RECORDER REPL, 4C 500KV SWYD	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	32	09-40*	FC834 SWITCH REPL, 4C 345KV (ALLOC 5)	Replaces Deteriorated Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none
postGRC	R	N	33	09-41*	XFMR T542 DGA MONITORS,ALLOC 2,4C 230/345KV	Install Monitors on aging Plant Electrical System component to sustain plant Reliability for remaining duration of existing contracts governing plant ownership.	***	none	none

Appendix B

FOUR CORNERS - CO-OWNER APPROVED PROJECTS TO DATE - NOVEMBER 24, 2008

PROJECTS APPROVED AT TIME OF 2009 GRC FORECAST IN MID-2007

Mid-2007 Cost Forecast for these Projects

Work Order	Capital Project Description	In Service	$1,000 Nominal Work Order Level 100% Share Total	SCE Share	SCE Total	Date Approved	E&O Cmte	Coord Cmte
02-19R1	#4 XFMR T541 REPL, SWYD (repl w/ 08-17)	2009	5,000	0.0346	173	4/10/2002	X	
03-04	TRAINING FACILITY	2007	684	0.3476	238	8/14/2002	X	
05-04R1	MAIN FLAME SCANNER UPGRADE, U 5	2008	2,379	0.4800	1,142	10/9/2006	X	
05-05R1	GSU & AUX XFMR FIRE WALL/OIL CONTAIN, U 4&5	2007	1,589	0.4800	763	4/5/2006		X
05-06	AIR COMPRESSOR VSI, U 4&5	2007	461	0.4800	221	9/15/2004	X	
05-13	GSU TRANSFORMER T633 & T634 REPL, U 5	2008	3,837	0.4800	1,842	9/15/2004	X	
06-01	MISC CAP, ENGR ELECTRONIC FILING COMMON	2007	25	0.3476	9	11/16/2005	X	
06-03	VEHICLE 2006 4C, 1/2 TON PICK-UP	2007	8	0.3476	3	8/16/2005	X	
06-05	LOWER BOILER REPLACEMENT, U 5	2008	18,495	0.4800	8,878	8/29/2005	X	
06-06	PENDANT RH & OUTLET HEADER REPL, U 5	2008	14,581	0.4800	6,999	8/29/2005	(a)	X
06-07	2ND STAGE PENDANT SUPHTR REPL, U 5	2008	11,187	0.4800	5,370	11/16/2005	(a)	X
06-08	HP TURBINE & CONTROLS REPL, U 5	2008	15,104	0.4800	7,250	8/29/2005	(a)	X
06-09R1	GSU TRANSFORMER T631 REPL, U 4	2008	3,186	0.4800	1,529	10/9/2006	X	
06-10	MAIN FLAME SCANNER UPGRADE, U 4	2007	1,498	0.4800	719	8/16/2005	X	
06-11	STACK FLOW MEASUREMENT REPL, U 4&5	2007	672	0.4800	322	8/16/2005	X	
06-14R1	COAL HNDLG REDUNDANT POWER SUPPL, U 4&5	2007	488	0.4800	234	8/15/2005	X	
06-18	ATB BREAKER REPL, 345KV SWYD	2007	2,335	0.1200	280	8/16/2005	X	
06-20R2	ASH LANDFILL AND HAUL ROAD, U 4&5 Phase 1	2007	7,554	0.4800	3,626	12/6/2006	(a)	X
06-21	THICK UNDERFL TO LINED ASH IMPOUND, U 4-5	2007	3,406	0.4800	1,635	11/16/2005	X	
06-22R1	HYDROGEN GENERATOR INSTALLATION, U 4&5	2007	385	0.4800	185	6/14/2006	X	
07-01	MISC CAP EXPEND, 2007 COMMON	2007	230	0.3476	80	10/9/2006	X	
07-02	NEW & REPL TOOLS, 2007	2007	150	0.3476	52	10/9/2006	X	
07-03	VEHICLE REPL, 2007	2007	204	0.3476	71	10/9/2006		X
07-04R0	PENDANT RH & OUTLET HEADER REPL, U 4	2010	18,981	0.4800	9,111	10/9/2006		X
07-05R0	HP TURBINE & CONTROLS REPL, U 4	2010	16,231	0.4800	7,791	10/9/2006		X
07-06R0	2ND STAGE PENDANT SUPHTR REPL, U 4	2010	14,081	0.4800	6,759	10/9/2006		X
07-07R0	SO2 CONTROLS REPL, U 5	2008	4,939	0.4800	2,371	10/9/2006		X
07-08	COAL PIPE REPL, U 5	2008	4,000	0.4800	1,920	10/9/2006	(a)	X
07-09	BAGHOUSE DUST SUPPRESSION, U 4&5	2008	2,356	0.4800	1,131	10/9/2006		X
07-10R0	BAGHOUSE TURNING VANES REPL, U 5	2008	2,204	0.4800	1,058	10/9/2006		X
07-11	AIR PREHEATER H/C BASKET REPL, U 5	2008	2,000	0.4800	960	11/15/2006		X
07-12R0	5258' LIFT LINED ASH IMPOUNDMENT, U 4&5	2009	1,861	0.4800	893	10/9/2006		X
07-13	LP GENERATOR FIELD REWIND, U 5	2008	1,828	0.4800	877	10/9/2006	X	
07-14	WASTE PROCESSING CONTROLS REPL, U 4&5	2007	1,676	0.4800	804	10/9/2006		X
07-15	MERCURY CEMS, U 4&5	2008	1,033	0.4800	496	10/9/2006		X
07-17	RESERVE TRANSF BREAKER ADDITION, U 4&5	2007	367	0.4800	176	10/9/2006	X	
07-18	BOILER MAINT TRACKING SOFTWARE, U 4&5	2008	353	0.4800	169	10/9/2006		X
07-19	GEN PROT RELAY REPLACEMENT, U 5	2008	249	0.4800	120	10/9/2006		X
07-20	STATOR LEAK MONITORING SYS, U 4&5	2007	220	0.4800	106	10/9/2006		X
07-21	AUX TURBINE OIL FILTRATION SYS, U 4&5	2007	220	0.4800	106	10/9/2006		X
07-22	SUPERHEAT ATTEMPERATOR REPL, U 5	2008	185	0.4800	89	10/9/2006		X
07-23	REDUND STATOR WATER FLOW MONITOR, U 4&5	2007	180	0.4800	86	10/9/2006		X
07-24	B INDUCED DRAFT FAN VSI REPL, U 4&5	2007	171	0.4800	82	10/9/2006		X
07-25	MAIN TURBINE OIL FILTRATION SYSTEM, U 4	2007	120	0.4800	58	10/9/2006		X
07-26	SPCC CONTAIN OF OIL TANKS, U 4&5	2007	91	0.4800	44	10/9/2006		X
07-27	COLD REHEAT #2 PIPE SUPPORT, U 5	2008	89	0.4800	43	10/9/2006		X
07-28	PLANT RTU REPLACEMENT, U 4&5	2007	80	0.4800	38	10/9/2006		X
07-29	SMARTSIGNAL PRED COND MONITOR	2007	1,180	0.3476	410	10/9/2006		X
07-30	POND CHLORIDES CONTROL UPGRADES	2008	748	0.3476	260	10/9/2006		X
07-31R0	MAXIMO SOFTWARE UPGRADE	2007	511	0.3476	178	10/9/2006		X
07-32	FIBER OPTIC CABLE UPGRADE	annual	350	0.3476	122	10/9/2006		X
07-33	DATA HISTORIAN REPL	2007	347	0.3476	121	10/9/2006		X
07-34	LAYDOWN YARD LIGHTING	2007	289	0.3476	100	10/9/2006		X
07-35	PBX UPGRADE	2007	100	0.3476	35	10/9/2006		X
07-36	EPA EDR SOFTWARE UPGRADE	2007	57	0.3476	20	10/9/2006		X
07-37	ATB BREAKER REPL, PHASE II, 345KV SWYD	2008	2,100	0.1200	252	10/9/2006		X
07-38	FC556 & 652 500 KV BREAKER, SWYD	2008	1,200	0.3200	384	10/9/2006		X
07-39	FC1222 230 KV BREAKER, SWYD	2007	255	0.4800	122	10/9/2006		X
07-40	AUX STEAM 3110B VALVE REPL, U 4	2007	285	0.4800	137	10/9/2006		X
07-41	345/500 KV XFMR BUSHING REPL	2007	1,325	0.4800	636	1/9/2007	X	
07-42	AUX STEAM 3110B VALVE REPL, U 5	2008	300	0.4800	144	1/9/2007	X	
SUB-TOTAL PAGE 1			176,020		79,827			

CORRECTIONS TO OCTOBER 10, 2008 VERSION OF TABLE

The Date Approved shown for many projects in the October 10, 2008 version of this table reflects the date of the E&O Meeting where these Projects were presented to the Plant Owners for Approval. The revised Date Approved herein reflects the dates which Arizona Public Service recently provided to SCE based on APS's record of the date the Plant Owners signed their Approval for these Projects.

(a) Date Approved is based on initial owner approval, which in some cases for some owners was the E&O Member. In some cases, some Coordinating Committee signatures were not obtained until a later date.

FOUR CORNERS - CO-OWNER APPROVED PROJECTS TO DATE - NOVEMBER 24, 2008

ADDITIONAL PROJECTS APPROVED TO DATE SINCE TIME OF 2009 GRC FORECAST

Mid-2008 Cost Forecast for these Projects

	Work Order	Capital Project Description	In Service	$1,000 Nominal Work Order Level 100% Share Total	SCE Share	SCE Total	Date Approved	E&O Cmte	Coord Cmte
1	07-44	LP TURB 4TH STAGE BUCKET REPL, UNIT 5	2008	5,614	0.4800	2,695	4/23/2007		X
1	07-45	LP TURB A&B 4TH STAGE BUCKET REPL, UNIT 4	2008	6,865	0.4800	3,295	6/6/2007		X
1	08-01	MISC CAP EXPEND, 2008, COMMON	2008	150	0.3476	52	8/14/2007	X	
	08-02	TOOLS, NEW & REPLACEMENT, COMMON	2008	175	0.3476	61	8/14/2007	X	
	08-03	VEHICLE REPL , 2008	2008	179	0.3476	62	8/14/2007	X	
	08-04	GSU TRANSFORMER T629 REPL, 4	2009	3,624	0.4800	1,836	8/14/2007	X	
1	08-05	LP (A) TURBINE BUCKET REPLACEMENT, U5	2008	3,250	0.4800	1,560	8/14/2007	X	
1	08-06	COAL SYS TRIPPER DECK DUST ELIMIN, 4&5	2009	403	0.4800	193	8/14/2007	X	
	08-07	OVERFIRE AIR NOX ABATEMENT, 4 (Engr Only)	TBD	1,505	0.4800	722	8/14/2007	X	
	08-08	IP TURBINE BUCKET REPL, UNIT 5	2008	1,393	0.4800	669	8/14/2007	(a)	X
	08-09	ABSORBER MODULE BLOWDOWN UPGDE, 4&5	2009	1,180	0.4800	566	8/14/2007	X	
1	08-10	COAL BELT DUST ELIMINATION, 4&5	2009	1,059	0.4800	508	8/14/2007	X	
	08-11	GE U TYPE BUSHING REPL, U4&5	2009	740	0.4800	355	8/14/2007	X	
1	08-12	TURB TWIP & EXTRACTION UPGRADE, U5	2009	800	0.4800	384	8/14/2007	X	
1	08-13	UNDERGRND COOLING WATER SYSTEMS, 4&5	2010	381	0.4800	183	8/14/2007	X	
	08-14	ASH POND 6 CLOSURES	annual	143	0.3476	50	8/14/2007	X	
1	08-15	HOGBACK SUB U TYPE BUSHING REPL, COM	2008	105	0.3476	36	8/14/2007	X	
1	08-16	PLANT RADIO UPGRADE, COM	2008	60	0.3476	21	8/14/2007	X	
	08-18R1.1**	PLANT PERIM SECUR UPGDE, 4C 345/500 SWYD (now 9-42,-43,-44)	annual	2,650	0.4800	1,272	8/14/2007	X	
	08-19	STEP UP XFRMR OIL BERMS 345/500 SY	2008	133	0.4800	64	8/14/2007	X	
1	08-20	LWI Canal Crossing Reroute & Replacement	2008	119	0.3476	41	4/14/2008	X	
1	08-21	500kV Breaker Replacement, 345/500 kV Swyd	2008	1,200	0.3200	384	7/8/2008		X
1	08-22R0	XFMR T627 REPL, 4C 345/500KV (ALLOC 7)	2009	4,650	0.4800	2,232	7/8/2008		X
1	08-23	XFMR 1AA DGA Monitors, 345/500 kV Swyd	2008	200	0.4800	96	6/12/2008	X	
1	08-24	Data Communications Link	2008	77	0.3476	27	9/3/2008	X	
1	09-01*	MISC CAP EXPEND, 2009	2009	175	0.3476	61	8/12/2008	X	
	09-02*	NEW & REPL TOOLS, 2009	2009	150	0.3476	52	8/12/2008	X	
	09-03*	VEHICLE REPL , 2009	2009	287	0.3476	100	8/12/2008	X	
	09-04*	COAL PIPE REPL, 4	2010	9,736	0.4800	4,673	8/12/2008	(a)	X
	09-05R0*	AIR PREHEATER H I C BASKET REPL, 4	2010	6,350	0.4800	3,048	8/12/2008	(a)	X
1	09-06R0*	O2 DECK HOIST STRUCTURE, 4&5	2009	1,100	0.4800	528	8/12/2008	X	
	09-07*	SPARE CIRCULATING PUMP MOTOR, 4&5	2009	1,166	0.4800	560	8/12/2008	X	
	09-08*	FD FAN SPARE MOTOR REPL, 4&5	2009	411	0.4800	197	8/12/2008	X	
	09-09*	REHEAT ISOLATION VALVES, 4	2010	626	0.4800	300	8/12/2008	X	
1	09-10*	SUPERHEATER ATTEMPERATOR REPL, 4	2010	194	0.4800	93	8/12/2008	X	
1	09-11*	BOILER WATER PARTICLE MONITORING, 4&5	2009	105	0.4800	50	8/12/2008	X	
	09-12*	LP (B) TURBINE 2ND STAGE BUCKET REPL, 4	2010	1,580	0.4800	758	8/12/2008	X	
	09-13*	IP TURBINE BUCKET REPL, 4	2010	620	0.4800	298	8/12/2008	X	
1	09-14*	TURBINE TWIP & EXTRACTION UPGDE, 4	2010	898	0.4800	431	8/12/2008	X	
1	09-15*	TURBINE SUPERVISORY INSTRUMENTATION REPL, 4	2010	647	0.4800	311	8/12/2008	X	
	09-16*	HP GENERATOR FIELD REWIND, 4	2010	3,567	0.4800	1,712	8/12/2008	X	
	09-17*	LP GENERATOR STATOR REWEDGE, 4	2010	1,261	0.4800	605	8/12/2008	X	
	09-18*	GENERATOR PROTECTION RELAY REPL, 4	2010	236	0.4800	113	8/12/2008	X	
1	09-19*	BAGHOUSE TURNING VANES REPL, 4	2010	4,700	0.4800	2,256	8/12/2008	X	
	09-20*	SCRUBBER OUTLET DUCT LINER REPL, 4	2010	3,269	0.4800	1,569	8/12/2008	X	
	09-21*	5268' LIFT LINED ASH IMPOUNDMENT, 4&5	2010	2,485	0.4800	1,193	8/12/2008	X	
	09-23*	SO2 CONTROLS REPL, 4	2010	3,560	0.4800	1,709	8/12/2008	X	
	09-24*	DCS PWR SUPPLY & AMM HARDWARE REPL, 4	2010	1,400	0.4800	672	8/12/2008	X	
	09-25*	COMPUTER PREDICTIVE/PERF TOOLS, 4&5	2009	1,200	0.4800	576	8/12/2008	X	
1	09-26*	AUX TURBINE PROTECTION UPGRADE, 4	2010	793	0.4800	381	8/12/2008	X	
	09-27*	4KV SWITCHGEAR PROTECTIVE RELAY REPL, 4	2010	717	0.4800	344	8/12/2008	X	
1	09-28*	TURBINE ENCLOSURE BRIDGE CRANE CONTROLS UPGDE, 4&5	2009	442	0.4800	212	8/12/2008	X	
	09-29*	NPDES DECANT CELL UPGRADES	annual	1,827	0.3476	635	8/12/2008	X	
	09-30*	NPDES HAUL ACCESS ROAD	2009	605	0.3476	210	8/12/2008	X	
1	09-31*	RIVERSTATION SWRG & MCC REPL	2010	1,776	0.3476	617	8/12/2008	X	
	09-32*	CONSTRUCTION SUBSTATION REPL	2009	717	0.3476	249	8/12/2008	X	
	09-33*	LOCAL AREA NETWORK SWITCH UPGDE	annual	900	0.3476	313	8/12/2008	X	
1	09-34*	VIDEO SCOPE REPL	2009	82	0.3476	29	8/12/2008	X	
1	09-35*	#8 XFMR T542 REPL, 4C 230/345KV (ALLOC 2)	2011	5,600	0.0346	194	8/12/2008	(a)	X
1	09-36*	TRANSFORMER PROT RELAY ADDN, 4C 230/345KV	2009	300	0.0346	10	8/12/2008	X	
1	09-37*	500 KV CCVT REPL, 4C 500KV (ALLOC 4)	2009	300	0.3200	96	8/12/2008	X	
1	09-38*	DIGITAL FAULT RECORDER REPL, 4C 345 SWYD	2009	240	0.1200	29	8/12/2008	X	
1	09-39*	DIGITAL FAULT RECORDER REPL, 4C 500KV SWYD	2009	120	0.3200	38	8/12/2008	X	
1	09-40*	FC834 SWITCH REPL, 4C 345KV (ALLOC 5)	2009	95	0.1200	11	8/12/2008	X	
1	09-41*	XFMR T542 DGA MONITORS,ALLOC 2,4C 230/345KV	2009	72	0.0346	2	8/12/2008	X	
	SUB-TOTAL PAGE 2			97,165		42,602			
	TOTAL			273,184		122,430			

CORRECTIONS TO OCTOBER 10, 2008 VERSION OF TABLE - SEE FOOTNOTES ON PAGE 1

1 These Projects were Not Specifically Identified at the time of the 2009 GRC Forecast.
However, GRC Forecast includes an "Unallocated Future Projects" line item to fund such additional projects as they arise.

Appendix C

APPENDIX C

DECLARATION OF JOHN F. DAYTON

I, John F. Dayton, have personal knowledge of the facts contained herein and if called to testify under oath could and could testify as follows:

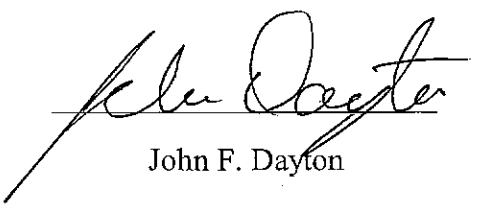
1. I have been continually employed by Southern California Edison Company ("SCE") from April 17, 1975 to the present date. My business address is 300 No. Lone Hill Ave., San Dimas, CA 91773. My present capacity is as the Manager of Business Planning & Development within the Power Production Department of Southern California Edison Company. In this capacity, I am responsible for management of Edison's Peaker Power Plants and several support services organizations within the Power Production Department. I also provide management oversite for regulatory and environmental activities within the Power Production Department and I'm responsible for the oversite of Edison's interest in the Four Corners Project and serve as a committee member on the Four Corners E&O Committee.
2. I graduated from California State Polytechnic University at San Luis Obispo in 1975 with a B. S. in Mechanical Engineering. In 1979, I received my professional engineering registration in Mechanical Engineering. I joined SCE in 1975. I have held positions in the Engineering and Construction and Power Production Departments. I have held my current position since August, 2003.
3. I make this declaration in support of SCE's Comments on Assigned Commissioner and Administrative Law Judge's Ruling Entering Additional Information Into the Record and Seeking Comments.

4. Appendix A is a matrix containing a list of capital projects at Four Corners and the basis for Emissions Performance Standard non-applicability. The statements in Appendix A are true and correct to the best of my knowledge.

5. Appendix B is an updated table of Four Corners co-owner approved projects, as of November 21, 2008. This table contains corrections to the October 15, 2008 version of the table submitted to the California Public Utilities Commission in response to data requests from the Commission and the Administrative Law Judge. The corrected table reflects revised approval dates recently provided to SCE. The statements in Appendix B are true and correct to the best of my knowledge.

6. Appendix D, filed under separate cover, contains relevant portions of SCE's General Rate Case Workpapers that are referenced in the matrix in Appendix A. The statements in Appendix D are true and correct to the best of my knowledge.

I declare the foregoing to be true and correct under penalty of perjury under the laws of the State of California. Executed this 24th day of November, 2008.



John F. Dayton

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE'S RULING ENTERING ADDITIONAL INFORMATION INTO THE RECORD AND SEEKING COMMENTS on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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Executed this **24th day of November 2008**, at Rosemead, California.

/s/Raquel Ippoliti

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