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Bcc:

Subject: RE: R.11-05-005 Section 399.20 Program: Proposed Request for Extension of Time  
Per Rule 11.6 -- Response requested by 2:00 p.m.

Southern California Edison Company opposes the Clean Coalition's request that the SB 32 program be implemented in a piecemeal fashion with the IOUs being required to submit advice letters concurrently with their comments to implement limit aspects of SB 32. Clean Coalition's proposal to implement limited portions of SB 32, while ignoring other portions of the statute and changes in law enacted through SB X1 2, violates both the RPS statute and federal law. Clean Coalition's request that the IOUs be required to file advice letters including "Amendment of PPAs in line with the proposed CREST PPA and party comments on the proposed PPA" would also circumvent the process for considering changes to the form contracts for the Public Utilities Code Section 399.20 program set forth in ALJ De Angelis' Ruling Setting Forth Implementation Proposal for SB 32 and SB 2 1X Amendments to Section 399.20.

In addition, Clean Coalition mistakenly links Section 399.20 implementation to the timeline associated with various federal tax benefits. Nothing prevents developers from constructing projects to take advantage of these programs and to sell energy into the market. Moreover, generators in the Section 399.20 size class will have several contracting opportunities with the IOUs and other load-serving entities in calendar year 2011, including, but not limited to, the soon-to-be launched RAM solicitations, the SPVP solicitations, and the PURPA contract available to generators under 20 MW.

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Date: 07/14/2011 05:06 PM

Subject: Re: R.11-05-005 Section 399.20 Program: Proposed Request for Extension of Time Per Rule 11.6 -- Response requested by 2:00 p.m.

Sent by: tam.hunt@gmail.com

Judge DeAngelis and Mattson,

In response to PG&E's request for extension of time, the Clean Coalition is deeply concerned over any further delays in SB 32 implementation, but we believe that the interests of all parties may be accommodated and we do not oppose the request for extension if mitigating measures are taken along the lines we suggest below.

Specifically, we request, after discussions with a number of parties, that the IOUs be

required to submit Advice Letters concurrently with their comments, in which limited aspects of SB 32 may be implemented in such a way that an operational program is created in 2011 with sufficient time for developers to utilize the significant federal tax benefits that expire at the end of the year. Under the Commission's proposed approach, it seems very unlikely that an operational program will be available in 2011, prompting our alternative proposal.

The utilities are already required to file Advice Letters in this proceeding so the limited changes we recommend should not significantly the burden of compliance with this requirement.

We initially raised the Advice Letter approach at Monday's PHC and there was no opposition.

We suggest that interim Advice Letter implementation include (to be fleshed out in our comments due July 21):

- Immediate increase of project size to 3 MW
- Pricing for the remainder of 2011 to be based upon the 2009 MPR + TOD.
- Amendment of PPAs in line with the proposed CREST PPA and party comments on the proposed PPA

These simple measures will implement key aspects of SB 32 and allow numerous potential projects to take advantage of the expiring section 1603 cash grant program and the expiring 100% bonus depreciation, which are jointly very substantial tax benefits.

Creating an operational SB 32 program in 2011 will provide substantial economic benefits to the state and provide a new procurement opportunity for many of the existing projects in the WDAT and CAISO queues.

Market response to this opportunity will also provide essential market pricing data for use in determining the final SB 32 pricing methodology and full implementation of SB 32 in 2012.

Sincerely,

Tam Hunt, Policy Advisor and Attorney  
Clean Coalition (formerly FIT Coalition)  
(805) 214-6150

On Thu, Jul 14, 2011 at 2:55 PM, Jan Reid <[janreid@sbcglobal.net](mailto:janreid@sbcglobal.net)> wrote:  
I do not support CEERT's proposal for the reasons given by the IOUs,

resource constraints caused by other filings which are due in R.11-05-005 and R.10-05-006 and because CEERT's proposal does not allow time for reply comments.

There are a number of conflicts with the August 5th date proposed by CEERT. In particular, LTPP Track I testimony is due on August 4th and extensive comments (up to 50 pages) are due on SB2(1x) on August 8th per ALJ Simon's ruling in this rulemaking.

Jan Reid  
Coast Economic Consulting  
(831) 476-5700

----- Original Message -----

**From:** Mills Karen

**To:** Sara Steck Myers ; [Middlekauff, Charles \(Law\)](mailto:Middlekauff, Charles (Law)) ; [Renfro, Aaron](mailto:Renfro, Aaron) ; [AMSmith@SempraUtilities.com](mailto:AMSmith@SempraUtilities.com) ; [Andrew.Luszcz@GlacialEnergy.com](mailto:Andrew.Luszcz@GlacialEnergy.com) ; [BJeider@ci.burbank.ca.us](mailto:BJeider@ci.burbank.ca.us) ; [Schoshinski, Beth](mailto:Schoshinski, Beth) ; [Brian.Prusnek@sce.com](mailto:Brian.Prusnek@sce.com) ; [CBlack@riversideca.gov](mailto:CBlack@riversideca.gov) ; [CKebler@SempraGeneration.com](mailto:CKebler@SempraGeneration.com) ; [Lee, Cheryl](mailto:Lee, Cheryl) ; [CPUCCases@pge.com](mailto:CPUCCases@pge.com) ; [CaliforniaDockets@pacificcorp.com](mailto:CaliforniaDockets@pacificcorp.com) ; [CentralFiles@SempraUtilities.com](mailto:CentralFiles@SempraUtilities.com) ; [DAKing@SempraGeneration.com](mailto:DAKing@SempraGeneration.com) ; [Peck, David B.](mailto:Peck, David B.) ; [DBodine@LibertyPowerCorp.com](mailto:DBodine@LibertyPowerCorp.com) ; [DNiehaus@SempraUtilities.com](mailto:DNiehaus@SempraUtilities.com) ; 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**Cc:** Baker, Georgetta

**Sent:** Thursday, July 14, 2011 12:53 PM

**Subject:** RE: R.11-05-005 Section 399.20 Program: Proposed Request for Extension of Time Per Rule 11.6 -- Response requested by 2:00 p.m.

I support Sara's proposal.

Karen Norene Mills

California Farm Bureau Federation

**From:** Sara Steck Myers [**Subject:** RE: R.11-05-005 Section 399.20 Program: Proposed Request for Extension of Time Per Rule 11.6 -- Response requested by 2:00 p.m.

Dear Charles:

I am responding on behalf of the Center for Energy Efficiency and Renewable Technologies (CEERT). I believe that your basis for requesting more time for comments does have merit, but CEERT has also been among those that has advocated for a decision no later than year's end to implement SB 32.

Keeping that in mind, what CEERT would support is a slightly different request – namely, the due date for reply comments is now August 5. CEERT would support an extension for opening comments to that date (August 5), then a workshop to be held later in August, with no reply comments, but rather post-workshop comments instead. Since the Draft Resolution on the RAM is now out, that can be taken into consideration by August 5, even before it becomes final.

Thank you.

Sara Myers

Attorney for CEERT

(415) 387-1904

ssmyers@att.net



**From:** Middlekauff, Charles (Law) [mailto:[CRMd@pge.com](mailto:CRMd@pge.com)]

**Sent:** Thursday, July 14, 2011 10:17 AM

**To:**

**Subject:** R.11-05-005 Section 399.20 Program: Proposed Request for Extension of Time Per Rule 11.6 -- Response requested by 2:00 p.m.

**Importance:** High

All Parties:

Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (the "IOUs") intend to jointly request from ALJs DeAngelis and Mattson a 30-day extension of time to file comments in response to ALJ DeAngelis' June 27, 2011 ruling regarding the Implementation of Public Utilities Code Section 399.20, including proposals for the implementation of Section 399.20 and draft form contracts. Included below is a draft of the e-mail requesting an extension that we will be sending to ALJs DeAngelis and Mattson later this afternoon.

Pursuant to Commission Rule 11.6, parties requesting an extension "must first make a good faith effort to ask [other affected] parties to agree to the extension." This e-mail provides notice of the IOUs plans to ask for an extension, and seeks to have any other parties that are interested to join in this request. We definitely welcome other parties joining on to this request. Our plan is to send this e-mail this afternoon. If you are interested in joining this request, please let us know by no later than 2:00 p.m. today and we will include you on the e-mail request. In addition, if you have any questions, please feel free to call Charles Middlekauff from PG&E at [\(415\) 973-6971](tel:4159736971).

We look forward to hearing from people and are hopeful that others will join in this request for an extension of time. Thank you for your consideration.

Georgetta Baker (SDG&E)

Cathy Karlstad (SCE)

Charles Middlekauff (PG&E)

**DRAFT OF E-MAIL REQUESTING EXTENSION**

ALJs DeAngelis and Mattson:

By this e-mail, San Diego Gas & Electric Company, Southern California Edison Company and Pacific Gas and Electric Company (jointly "IOUs") respectfully request an extension of time to file proposals and responses to the issues raised in ALJ DeAngelis' *Administrative Law Judge's Ruling Setting Forth Implementation Proposal for SB 32 and SB 2 1X Amendments to Section 399.20*, issued June 27, 2011 ("ALJ Ruling"). Specifically, the IOUs request a 30-day extension so that proposals and responses, including draft form contracts, would be filed August 22, 2011, rather than July 21, 2011.

The ALJ Ruling includes 28 detailed questions regarding the implementation of Public Utilities Code Section 399.20 to create a Feed-In Tariff ("FIT") for small renewable generating facilities that are 3 megawatts or less in size. On July 11, ALJ Mattson conducted a Pre-Hearing Conference ("PHC") regarding the ALJ Ruling and Section 399.20 implementation generally. At the PHC, ALJ Mattson clarified that the IOUs were expected to file draft form contracts with their July 21 comments. ALJ Mattson also clarified that parties should submit detailed pricing and other proposals to implement Section 399.20. The IOUs and other parties expressed concern about the timing given the significant amount of effort required to respond to the 28 issues in the AL Ruling, prepared detailed proposals and to submit draft form contracts.

While the IOUs understand and support the Commission's interest in expeditiously implementing Section 399.20, adopting a schedule that does not provide sufficient time to prepare meaningful responses and proposals, and to develop form contracts, will not benefit the parties or the Commission. All of the parties in this proceeding need time to develop well thought out and considered proposals. The IOUs have the additional responsibility of developing form contracts, which requires detailed and time-consuming work to make sure that each of the elements of Section 399.20 is incorporated, while developing a form contract that is understandable for developers

and comprehensive to protect the interests of customers.

In addition, certain aspects of the Section 399.20 program and draft form contracts may be impacted by the Commission's decision on the Draft Resolution implementing the Renewable Auction Mechanism ("RAM") Program. See Draft Resolution E-4414. The RAM Program draft resolution was issued yesterday and may be acted on at the Commission's August 18, 2011 meeting. It makes sense for the parties to consider the outcome of the RAM program draft resolution before submitting comments and draft form contracts.

The IOUs respectfully request a 30-day extension to respond to the ALJ Ruling, including providing proposals for implementing Section 399.20, and to submit draft form contracts. After the responses and contracts are submitted on August 22, the parties and Commission can conduct a workshop on August 31 or September 1, as described in the ALJ Ruling, to provide an overview of comments, proposals and draft contracts. At that time, the Commission can determine the appropriate next steps, whether it includes additional briefing or additional working groups to review and finalize the form contracts.

Given the short time before responses to the ALJ Ruling are due, the IOUs also respectfully request that the ALJs act quickly on this request.

Thank you for your consideration.

Georgetta Baker

Cathy Karlstad

Charles Middlekauff