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Subject: R.11-05-005: Section 399.20 Program -- Request for Extension of Time

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 issued 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 ALJ Ruling, prepare 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.

Earlier today, consistent with Commission Rule 11.6, the IOUs sent an e-mail to all of the parties in this proceeding asking if they would agree to the proposed extension. TURN, DRA, IEP, and Jan Reid indicated that they supported the IOUs' proposal. The Solar Alliance indicated that it did not oppose the IOUs' proposal. CEERT, the California Farm Bureau Federation, and Agricultural Energy Consumers Association do not oppose an extension, but proposed "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." The IOUs do not support CEERT's proposal as it does not provide sufficient time to develop comprehensive Section 399.20 proposals and draft 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