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Bcc:

Subject: RE: R.07-05-025: Comment Period for DA OIR Proposed Decision

To parties in R. 07-05-025:

The request to increase the page limit from 15 to 25 page on comments to the Proposed Decision on Direct Access Rulemaking is granted.

ALJ Thomas Pulsifer

From: Dan Douglass [mailto:douglass@energyattorney.com]

Sent: Friday, September 02, 2011 12:14 PM

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Subject: R.07-05-025: Comment Period for DA OIR Proposed Decision

Your Honor and parties to R.07-05-025,

As you know, opening comments are due on September 12 on the Proposed Decision in the Direct Access rulemaking. Under Rule 14.3(b) and the cover letter attached to the PD, parties are limited to 15 pages to comment on an extremely complex 115-page proposed decision. The Rule reads, in part, as follows:

(b) Except in general rate cases, major plant addition proceedings, and major generic investigations, comments shall be limited to 15 pages in length. Comments in general rate cases, major plant addition proceedings, and major generic investigations shall not exceed 25 pages.

DACC, MEA and AReM would like to request that the 15-page limitation be expanded to 25, due to the complexity of the issues involved in the Proposed Decision. The DA rulemaking is at least analogous to a "major generic investigation" and fifteen double-spaced pages is not adequate to the task of discussing fully the important issues in the Proposed Decision.

If any other parties have comments on this suggestion, they would be very much appreciated!

This message is being sent in three separate emails, to comply with server constraints. Thanks!

Dan Douglass

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