

From: MDay  
Sent: 9/2/2011 12:21:15 PM  
To: ALJ Thomas Pulsifer (trp@cpuc.ca.gov); 'Dan Douglass'  
(douglass@energyattorney.com)  
kmills@cfbf.com (kmills@cfbf.com); liddell@energyattorney.com  
(liddell@energyattorney.com); jleslie@luce.com (jleslie@luce.com);  
klatt@energyattorney.com (klatt@energyattorney.com); janreid@coastecon.com  
(janreid@coastecon.com); keith.mccrea@sablaw.com (keith.mccrea@sablaw.com);  
tlocascio@libertypowercorp.com (tlocascio@libertypowercorp.com);  
Cc: steven@iepa.com (steven@iepa.com); martinhomec@gmail.com  
(martinhomec@gmail.com); etoppi@ces-ltd.com (etoppi@ces-ltd.com);  
iibarguren@tyrenergy.com (iibarguren@tyrenergy.com);  
RLane@semprautilities.com (RLane@semprautilities.com); jeanne.sole@sfgov.org  
(jeanne.sole@sfgov.org); mtierney-lloyd@enernoc.com (mtierney-  
lloyd@enernoc.com); mdjoseph@adamsbroadwell.com  
(mdjoseph@adamsbroadwell.com); tdillard@sppc.com (tdillard@sppc.com); ek@a-  
klaw.com (ek@a-klaw.com); rkmoore@gswater.com (rkmoore@gswater.com);  
AdviceTariffManager@sce.com (AdviceTariffManager@sce.com);  
chh@cpuc.ca.gov (chh@cpuc.ca.gov); mike.montoya@sce.com  
(mike.montoya@sce.com); debra.gallo@swgas.com (debra.gallo@swgas.com);  
jeff.malone@calpeak.com (jeff.malone@calpeak.com); nwhang@manatt.com  
(nwhang@manatt.com); ewdlaw@sbcglobal.net (ewdlaw@sbcglobal.net);  
KHassan@SempraUtilities.com (KHassan@SempraUtilities.com);  
lpettis@calstate.edu (lpettis@calstate.edu); KFoley@SempraUtilities.com  
(KFoley@SempraUtilities.com); Cherry, Brian K  
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7); nes@a-klaw.com  
(nes@a-klaw.com); bfinkelstein@turn.org (bfinkelstein@turn.org);  
norman.furuta@navy.mil (norman.furuta@navy.mil); whb@a-klaw.com (whb@a-  
klaw.com); Middlekauff, Charles (Law)  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=CRMd); michaelboyd@sbcglobal.net  
(michaelboyd@sbcglobal.net); erasmussen@marinenergyauthority.org  
(erasmussen@marinenergyauthority.org); gmorris@emf.net (gmorris@emf.net);  
cmkehrein@ems-ca.com (cmkehrein@ems-ca.com); blaising@braunlegal.com  
(blaising@braunlegal.com); abb@eslawfirm.com (abb@eslawfirm.com);  
stevegreenwald@dwt.com (stevegreenwald@dwt.com); wetstone@alamedamp.com  
(wetstone@alamedamp.com); barmackm@calpine.com (barmackm@calpine.com);  
atrowbridge@daycartermurphy.com (atrowbridge@daycartermurphy.com);  
ddavie@wellhead.com (ddavie@wellhead.com); phanschen@mofo.com  
(phanschen@mofo.com); blake@consumercal.org (blake@consumercal.org);  
westgas@aol.com (westgas@aol.com); Service@spurr.org (Service@spurr.org);  
Mike@alpinenaturalgas.com (Mike@alpinenaturalgas.com);  
patrickm@crossborderenergy.com (patrickm@crossborderenergy.com);  
scarter@nrdc.org (scarter@nrdc.org); lisazycherman@dwt.com  
(lisazycherman@dwt.com); mbyron@gwfpower.com (mbyron@gwfpower.com);  
michael.hindus@pillsburylaw.com (michael.hindus@pillsburylaw.com);

ds1957@att.com (ds1957@att.com); jderosa@ces-ltd.com (jderosa@ces-ltd.com);  
george.waidelich@safeway.com (george.waidelich@safeway.com);  
zdavis@advantageiq.com (zdavis@advantageiq.com); eric.a.artman@gmail.com  
(eric.a.artman@gmail.com); clamasbabbini@comverge.com  
(clamasbabbini@comverge.com); cassandra.sweet@dowjones.com  
(cassandra.sweet@dowjones.com); mrw@mrwassoc.com (mrw@mrwassoc.com);  
DWTCPUCDOCKETS@dwt.com (DWTCPUCDOCKETS@dwt.com);  
kb@EnerCalUSA.com (kb@EnerCalUSA.com); jkern@bluestarenergy.com  
(jkern@bluestarenergy.com); tam.hunt@gmail.com (tam.hunt@gmail.com);  
matthew@turn.org (matthew@turn.org); Silva, Madeline  
(/O=PG&E/OU=Corporate/cn=Recipients/cn=M6Sk); kdw@woodruff-expert-  
services.com (kdw@woodruff-expert-services.com); mcox@calplg.com  
(mcox@calplg.com); judypau@dwt.com (judypau@dwt.com);  
jmcmahon@8760energy.com (jmcmahon@8760energy.com);  
steven.huhman@morganstanley.com (steven.huhman@morganstanley.com);  
tciardella@nvenergy.com (tciardella@nvenergy.com); rasmith@sfwater.org  
(rasmith@sfwater.org); cmansbridge@ces-ltd.com (cmansbridge@ces-ltd.com)

Bcc:

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

Commercial Energy supports the request of Mr. Douglas.

**Michael B. Day**

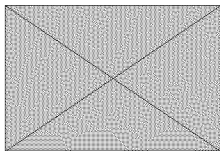
direct line 415.765.8408

tel 415.392.7900 | fax 415.398.4321

505 Sansome Street, Suite 900 | San Francisco, CA 94111

[mday@goodinmacbride.com](mailto:mday@goodinmacbride.com)

vCard | [www.goodinmacbride.com](http://www.goodinmacbride.com)



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

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

**To:** ALJ Thomas Pulsifer

**Cc:** liddell@energyattorney.com; klatt@energyattorney.com; jleslie@luce.com; kmills@cfbf.com; janreid@coastecon.com; RLane@semprautilities.com; steven@iepa.com; martinhomec@gmail.com; etoppi@ces-ltd.com; keith.mccrea@sablaw.com; tlocascio@libertypowercorp.com; iibarguren@tyrenergy.com; debra.gallo@swgas.com; tdillard@sppc.com; khassan@semprautilities.com; nwhang@manatt.com; lpettis@calstate.edu; AdviceTariffManager@sce.com; mike.montoya@sce.com; rkmoore@gswater.com; KFoley@SempraUtilities.com; jeff.malone@calpeak.com; ewdlaw@sbcglobal.net; mtierney-lloyd@enernoc.com; ek@a-klaw.com; mdjoseph@adamsbroadwell.com; chh@cpuc.ca.gov; jeanne.sole@sfgov.org; norman.furuta@navy.mil; bfinkelstein@turn.org; scarter@nrdc.org; nes@a-klaw.com; whb@a-klaw.com; michael.hindus@pillsburylaw.com; lisazycherman@dwt.com; MDay; stevegreenwald@dwt.com; CRMd@pge.com; bkc7@pge.com; Service@spurr.org; mbyron@gwfpower.com; barmackm@calpine.com; ds1957@att.com; george.waidelich@safeway.com; phanschen@mofo.com; gmorris@emf.net; patrickm@crossborderenergy.com; erasmussen@marinenergyauthority.org; eric.a.artman@gmail.com; michaelboyd@sbcglobal.net; mike@alpinenaturalgas.com; westgas@aol.com; jderosa@ces-ltd.com; cmkehrlein@ems-ca.com; ddavie@wellhead.com; blake@consumercal.org; blaising@braunlegal.com; abb@eslawfirm.com; atowbridge@daycartermurphy.com; zdavis@advantageiq.com; wetstone@alamedamp.com; clamasbabbini@comverge.com; cassandra.sweet@dowjones.com; cmansbridge@ces-ltd.com; kb@enercalusa.com; kdw@woodruff-expert-services.com; M6Sk@pge.com; matthew@turn.org; mcox@calplg.com; tam.hunt@gmail.com; tciardella@nvenergy.com; jkern@bluestarenergy.com; DWTCPUCDOCKETS@dwt.com; mrw@mrwassoc.com; judypau@dwt.com; rasmith@sflower.org; jmcMahon@8760energy.com; steven.huhman@morganstanley.com  
**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

Counsel for DACC, MEA and AReM

Douglass & Liddell

21700 Oxnard Street, Suite 1030

Woodland Hills, CA 91367

Telephone: (818) 961-3001

Facsimile: (818) 961-3004

Cellphone: (818) 404-7535

[douglass@energyattorney.com](mailto:douglass@energyattorney.com)

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