

**VERIFICATION**

I, Diana L. Lee, am counsel of record for the Division of Ratepayer Advocates in proceeding R.11-05-005 authorized to make this verification on the organization's behalf. I hereby verify that the statements made in **OPENING COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES IN RESPONSE TO ADMINISTRATIVE LAW JUDGE'S SIMON'S PROPOSED DECISION IMPLEMENTING PORTFOLIO CONTENT CATEGORIES FOR THE RENEWABLES STANDARD PORTFOLIO (RPS) PROGRAM** filed on October 27, 2011, are true and correct to the best of my knowledge, except for those matters which are stated on information and belief, and as those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 28, 2011 at San Francisco, California.

/s/      DIANA L. LEE

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DIANA L. LEE