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
-	DIANA L. LEE