

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate
and Refine Procurement Policies and
Consider Long-Term Procurement Plans

R.10-05-006
(filed May 6, 2010)

**COMMENTS OF THE UTILITY REFORM NETWORK
ON THE PROPOSED DECISION OF ALJ ALLEN
IN TRACK II OF THE 2010 LTPP**



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November 30, 2011

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IN TRACK II OF THE 2010 LTPP**

I. INTRODUCTION

Pursuant to Rule 14.3 the Utility Reform Network (“TURN”) submits these comments on the Proposed Decision of ALJ Allen (the “PD”), entitled “Proposed Decision Approving Modified Bundled Procurement Plans.” TURN files these comments within 20 days of the mailing date of November 10, 2011.

TURN made specific recommendations concerning three issues. The PD adopts outcomes consistent with TURN’s recommendations, and TURN does not identify any specific errors related to these three issues. TURN generally supports the PD and recommends that the Commission adopt it without modifications.

II. TURN DOES NOT IDENTIFY ANY ERRORS IN THE SECTIONS ADDRESSING THE THREE ISSUES RAISED BY TURN

TURN did not submit testimony in this Track II phase of the 2010 LTPP. TURN filed two separate Opening Briefs (one public and one confidential) addressing three distinct issues related to the bundled procurement plans of PG&E and SCE. TURN recommended that the Commission 1) deny PG&E’s request for pre-approval of biomethane procurement for RPS compliance at a premium price, 2) deny PG&E’s request to use advice letters related to nuclear fuel supply contracts to apportion potential liability resulting from the transport of nuclear fuel, and 3) deny SCE’s request for pre-approval of short-term renewable contracts.

The PD addresses these issues in the sections concerning the PG&E gas supply plan (Section 11), the PG&E nuclear fuel procurement plan (Section 12), and SCE short term renewable contracts (Section 14). In all cases the PD reaches an outcome that is consistent with TURN's recommendations. TURN does not identify any legal, policy or factual errors in these sections.

III. TURN SUPPORTS THE PROPOSED DECISION

The PD is a succinct and clear summary of the issues in dispute concerning the bundled procurement plans filed by the three electric investor-owned utilities. TURN generally supports the PD and recommends that the Commission adopt it without modifications.

November 30, 2011

Respectfully submitted,

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