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Sent: 3/29/2012 8:38:08 AM  
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Bcc:  
Subject: Schedule in Class Location OII, I.11-11-009

CPSD agreed to the April 2, 2012 Second Update submission date with the proviso that **ALL** information would be complete and final. We have had ongoing data requests following the PHC that have not yet had a response. Further, CPSD will very likely need discovery concerning information included in the Second Update. Under the circumstances, your suggested date for CPSD's testimony of April 20, 2012, is not possible.

PG&E's past delays in providing data responses have seriously delayed staff's report in this proceeding as noted below.

ALJ YIP-KIKUGAWA: Okay. And you [PG&E] had originally asked for an extension of time to file this response [the January 17, 2012 Response]. And from your response [of January 17<sup>th</sup>], you're basically saying it's not complete but you didn't come and ask me for additional time, you just set a date on your own. Can you let me know why you did that?

...

MR. MALKIN: And now that you mention it, perhaps the better way to have done that would have been to come to your Honor in advance and say Here's where we are, we're going to have most of it on the 17, there are going to be these tag-on pieces, and get your concurrence and I apologize for that.

MR. BERDGE: ...Yesterday after 4:00 o'clock, we received responses -- data responses to our data requests [submitted] in July of last year and September of last year. We still have some immediate ones that we have submitted to them after the January 17th response that Mr. Malkin has said we can expect later this afternoon. But that kind of delay is an ongoing problem.

ALJ YIP-KIKUGAWA: Is it better for there to be a rolling production, or is it better there be one report at a date certain with updated numbers?

MR. BERDGE: I've confirmed with staff, and I agree with staff that we want a final complete record on that March 31st date and then a certain amount of time to respond to that. But rather than have rolling data responses, which we've had for months now, we'd prefer to have everything completed by that date certain.

CPSD's proposed schedule is very tight and will depend on quick turnarounds by PG&E with responses to CPSD's data requests after the April 2, 2012 Second Update.

CPSD Proposed Schedule for Class Location OII

April 17	Second PHC (tentative per Feb 3 PHC)
May 25	CPSD direct testimony
June 4	Intervenor testimony
June 15	PG&E testimony
June 29	CPSD rebuttal testimony
July 2-13	Hearings
(July 16	ALJ starts hearings on another case and asked hearings be concluded by this date)

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