

From: Kelly Foley

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marcusdacunha@hotmail.com (marcusdacunha@hotmail.com);
Adam.Gusman@GlacialEnergy.com (Adam.Gusman@GlacialEnergy.com);
rick_noger@praxair.com (rick_noger@praxair.com);
TPhillips@TigerNaturalGas.com (TPhillips@TigerNaturalGas.com);
DBodine@LibertyPowerCorp.com (DBodine@LibertyPowerCorp.com);
DBodine@LibertyPowerCorp.com (DBodine@LibertyPowerCorp.com);
cpacc@calpine.com (cpacc@calpine.com); abraham.silverman@nrgenergy.com
(abraham.silverman@nrgenergy.com); kwd@vnf.com (kwd@vnf.com);
victor.m.gonzalez@constellation.com (victor.m.gonzalez@constellation.com);
liddell@energyattorney.com (liddell@energyattorney.com);
tdarton@pilotpowergroup.com (tdarton@pilotpowergroup.com);
mmazur@3PhasesRenewables.com (mmazur@3PhasesRenewables.com);
douglass@energyattorney.com (douglass@energyattorney.com);
igoodman@commerceenergy.com (igoodman@commerceenergy.com);
To: kb@EnerCalUSA.com (kb@EnerCalUSA.com); AMSmith@SempraUtilities.com
(AMSmith@SempraUtilities.com); gbass@noblesolutions.com
(gbass@noblesolutions.com); klatt@energyattorney.com
(klatt@energyattorney.com); Andrew.Wang@SolarReserve.com
(Andrew.Wang@SolarReserve.com); rkmoore@gswater.com
(rkmoore@gswater.com); martin.kadillak@shell.com (martin.kadillak@shell.com);
BRIANF@VEA.COOP (BRIANF@VEA.COOP); akbar.jazayeri@sce.com
(akbar.jazayeri@sce.com); STomec@CapitalPower.com
(STomec@CapitalPower.com); p.shepard@dgc-us.com (p.shepard@dgc-us.com);
Cherry, Brian K (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7);
ssmyers@att.net (ssmyers@att.net); sdhilton@stoel.com (sdhilton@stoel.com);
nes@a-klaw.com (nes@a-klaw.com); mtierney-lloyd@enernoc.com (mtierney-
lloyd@enernoc.com); bcragg@goodinmacbride.com
(bcragg@goodinmacbride.com); gmorris@emf.net (gmorris@emf.net);
GloriaB@anzaelectric.org (GloriaB@anzaelectric.org); Huffman, Mark (Law)
(/O=PG&E/OU=Corporate/cn=Recipients/cn=MRH2);
mdjoseph@adamsbroadwell.com (mdjoseph@adamsbroadwell.com);
lwisland@ucsusa.org (lwisland@ucsusa.org); andrea.morrison@directenergy.com
(andrea.morrison@directenergy.com); sue.mara@RTOadvisors.com
(sue.mara@RTOadvisors.com); matthew@turn.org (matthew@turn.org);
jeffgray@dwt.com (jeffgray@dwt.com); Patrick.VanBeek@CommercialEnergy.net
(Patrick.VanBeek@CommercialEnergy.net); dorth@krcd.org (dorth@krcd.org);
mcampbell@sfwater.org (mcampbell@sfwater.org); lcottle@winston.com
(lcottle@winston.com); ek@a-klaw.com (ek@a-klaw.com);
JChamberlin@LSPower.com (JChamberlin@LSPower.com);
mday@goodinmacbride.com (mday@goodinmacbride.com); jstoddard@manatt.com
(jstoddard@manatt.com); mmattes@nossaman.com (mmattes@nossaman.com);
theresa.mueller@sfgov.org (theresa.mueller@sfgov.org); srt@cpuc.ca.gov
(srt@cpuc.ca.gov); wrostov@earthjustice.org (wrostov@earthjustice.org);

agerterlinda@gmail.com (agerterlinda@gmail.com); smartinez@nrdc.org (smartinez@nrdc.org); dbehles@ggu.edu (dbehles@ggu.edu); lchaset@keyesandfox.com (lchaset@keyesandfox.com); kristine@SoCalTelephone.com (kristine@SoCalTelephone.com); kmills@cfbf.com (kmills@cfbf.com); lmh@eslawfirm.com (lmh@eslawfirm.com); jeanne.sole@sfgov.org (jeanne.sole@sfgov.org); brbarkovich@earthlink.net (brbarkovich@earthlink.net); filings@a-klaw.com (filings@a-klaw.com); mpa@a-klaw.com (mpa@a-klaw.com); CentralFiles@SempraUtilities.com (CentralFiles@SempraUtilities.com); jimross@r-c-s-inc.com (jimross@r-c-s-inc.com); case.admin@sce.com (case.admin@sce.com); mrw@mrwassoc.com (mrw@mrwassoc.com); wem@igc.org (wem@igc.org); whb@a-klaw.com (whb@a-klaw.com); bobgex@dwt.com (bobgex@dwt.com); janreid@coastecon.com (janreid@coastecon.com); Gonzales, Matthew (/O=PG&E/OU=Corporate/cn=Recipients/cn=MRGg); kelly@votesolar.org (kelly@votesolar.org); DWTCPUCDOCKETS@dwt.com (DWTCPUCDOCKETS@dwt.com); blaising@braunlegal.com (blaising@braunlegal.com); jsanders@caiso.com (jsanders@caiso.com); adam.green@solarreserve.com (adam.green@solarreserve.com); tam.hunt@gmail.com (tam.hunt@gmail.com); abb@eslawfirm.com (abb@eslawfirm.com); Gong, Alice (/O=PG&E/OU=Corporate/cn=Recipients/cn=AxL3); Diane.Fellman@nrgenergy.com (Diane.Fellman@nrgenergy.com); californiadockets@pacificorp.com (californiadockets@pacificorp.com); ddavie@wellhead.com (ddavie@wellhead.com); mary.wiencke@pacificorp.com (mary.wiencke@pacificorp.com); ccollins@Energystrat.com (ccollins@Energystrat.com); dweisz@marinenergy.com (dweisz@marinenergy.com); carol.schmidfrazee@sce.com (carol.schmidfrazee@sce.com); matthew.barmack@calpine.com (matthew.barmack@calpine.com); bmarshall@psrec.coop (bmarshall@psrec.coop); dansvec@hdo.net (dansvec@hdo.net); WKeilani@SempraUtilities.com (WKeilani@SempraUtilities.com); bspeckman@nexant.com (bspeckman@nexant.com); deb@a-klaw.com (deb@a-klaw.com); gifford.jung@powerex.com (gifford.jung@powerex.com); stephen.t.greenleaf@jpmorgan.com (stephen.t.greenleaf@jpmorgan.com); Melissa.Hovsepian@sce.com (Melissa.Hovsepian@sce.com); jleslie@mckennalong.com (jleslie@mckennalong.com); matt.vespa@SierraClub.org (matt.vespa@SierraClub.org); ahmad.faruqui@brattle.com (ahmad.faruqui@brattle.com); Rachel.McMahon@firstsolar.com (Rachel.McMahon@firstsolar.com); oliviapara@dwt.com (oliviapara@dwt.com); sbailey@semprausgp.com (sbailey@semprausgp.com); ehsieh@a123systems.com (ehsieh@a123systems.com); margaret.miller@brookfieldrenewable.com (margaret.miller@brookfieldrenewable.com); Greenacre, Wade (/O=PG&E/OU=Corporate/cn=Recipients/cn=WAG9); CalConsumersAlliance@gmail.com (CalConsumersAlliance@gmail.com); chris.hendrix@wal-mart.com (chris.hendrix@wal-mart.com); andra.pligavko@gmail.com (andra.pligavko@gmail.com);

randy.keller@calenergy.com (randy.keller@calenergy.com); rfagan@synapse-energy.com (rfagan@synapse-energy.com); hudsonr@conedsolutions.com (hudsonr@conedsolutions.com); cpospisil@edisonmission.com (cpospisil@edisonmission.com); marilyn@sbesc.com (marilyn@sbesc.com); gestrada@krismayeslaw.com (gestrada@krismayeslaw.com); FairbanksA@ConEdSolutions.com (FairbanksA@ConEdSolutions.com); charles.purshouse@camcoglobal.com (charles.purshouse@camcoglobal.com); adaberko@starwood.com (adaberko@starwood.com); rwilson@synapse-energy.com (rwilson@synapse-energy.com); sfoley@ggu.edu (sfoley@ggu.edu); ndivekar@synapse-energy.com (ndivekar@synapse-energy.com); bvitale@climatetrust.org (bvitale@climatetrust.org); RegRelCPUCCases (/O=PG&E/OU=Corporate/cn=Recipients/cn=RegRelCPUCCases); jody_london_consulting@earthlink.net (jody_london_consulting@earthlink.net); glw@eslawfirm.com (glw@eslawfirm.com); cem@newsdata.com (cem@newsdata.com); Middlekauff, Charles (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=CRMd); erasmussen@marinenergyauthority.org (erasmussen@marinenergyauthority.org); todd.edmister@bingham.com (todd.edmister@bingham.com); dkk@eslawfirm.com (dkk@eslawfirm.com); tomb@crossborderenergy.com (tomb@crossborderenergy.com); kowalewskia@calpine.com (kowalewskia@calpine.com); eddyconsulting@gmail.com (eddyconsulting@gmail.com); steven@iepa.com (steven@iepa.com); mpryor@energy.state.ca.us (mpryor@energy.state.ca.us); martinhomec@gmail.com (martinhomec@gmail.com); djurijew@capitalpower.com (djurijew@capitalpower.com); atrowbridge@daycartermurphy.com (atrowbridge@daycartermurphy.com); dietrichlaw2@earthlink.net (dietrichlaw2@earthlink.net); bsb@eslawfirm.com (bsb@eslawfirm.com); kdw@woodruff-expert-services.com (kdw@woodruff-expert-services.com); sean.beatty@genon.com (sean.beatty@genon.com); brian.theaker@nrgenergy.com (brian.theaker@nrgenergy.com); beth@beth411.com (beth@beth411.com); dmarcus2@sbcglobal.net (dmarcus2@sbcglobal.net); skh@cpuc.ca.gov (skh@cpuc.ca.gov); dbp@cpuc.ca.gov (dbp@cpuc.ca.gov); kristin.b.burford@gmail.com (kristin.b.burford@gmail.com); david@ceert.org (david@ceert.org); pushkarwagle@flynnrci.com (pushkarwagle@flynnrci.com); dwang@nrdc.org (dwang@nrdc.org); pcort@earthjustice.org (pcort@earthjustice.org); jack@casaraquel.com (jack@casaraquel.com); jbaird@earthjustice.org (jbaird@earthjustice.org); slazerow@cbeal.org (slazerow@cbeal.org); philm@scdenergy.com (philm@scdenergy.com); tlindl@keyesandfox.com (tlindl@keyesandfox.com); daniel.h.kim@me.com (daniel.h.kim@me.com); will.mitchell@cpv.com (will.mitchell@cpv.com); clu@cpuc.ca.gov (clu@cpuc.ca.gov); CCE@cpuc.ca.gov (CCE@cpuc.ca.gov); nlr@cpuc.ca.gov (nlr@cpuc.ca.gov); kwh@cpuc.ca.gov (kwh@cpuc.ca.gov); nws@cpuc.ca.gov (nws@cpuc.ca.gov); cbk@eslawfirm.com (cbk@eslawfirm.com); wtr@cpuc.ca.gov (wtr@cpuc.ca.gov); kar@cpuc.ca.gov (kar@cpuc.ca.gov); irene@igc.org (irene@igc.org); ericg@votesolar.org (ericg@votesolar.org); aadeyeye@earthjustice.org (aadeyeye@earthjustice.org);

mark.tucker@pacificorp.com (mark.tucker@pacificorp.com); ds1@cpuc.ca.gov (ds1@cpuc.ca.gov); connie.leni@energy.ca.gov (connie.leni@energy.ca.gov); mike.jaske@energy.state.ca.us (mike.jaske@energy.state.ca.us); dmg@cpuc.ca.gov (dmg@cpuc.ca.gov); mla@cpuc.ca.gov (mla@cpuc.ca.gov); brc@cpuc.ca.gov (brc@cpuc.ca.gov); cho@cpuc.ca.gov (cho@cpuc.ca.gov); peter.cavan@pulseenergy.com (peter.cavan@pulseenergy.com); kd1@cpuc.ca.gov (kd1@cpuc.ca.gov); cu2@cpuc.ca.gov (cu2@cpuc.ca.gov); jordan.parrillo@cpuc.ca.gov (jordan.parrillo@cpuc.ca.gov); JWaen@MarinEnergyAuthority.org (JWaen@MarinEnergyAuthority.org); dws@r-s-c-inc.com (dws@r-s-c-inc.com)

Cc:

Bcc:

Subject: R.12-03-014 (2012 LTPP) Request of the Environmental Parties for Extension of Time SERVICE 1 of 1

Your Honor,

CEERT, CEJA, IREC, NRDC, Sierra Club and Vote Solar (Environmental Parties), all parties to this proceeding, respectfully request an extension of the May 31, 2012 due date for Comments on the Track 2 2012 Energy Division Straw Proposal on LTPP Planning Standards (Straw Proposal).

The Environmental Parties seek this extension in order to review the actual CEC data and assumptions that are proposed in this Straw Proposal. The CEC Final 2012 Demand Forecast, which is critical to the Straw Proposal, has not yet been released by the CEC. Thus, parties cannot meaningfully analyze the substance of that forecast, which is central to this procurement proceeding.

Equally important to this Straw Proposal and procurement proceeding is the CEC's Incremental Uncommitted Energy Efficiency report, which also has not yet been released by the CEC. The CEC plans to adopt the Final Demand Forecast at its June 13, 2012 business meeting, and release the Incremental Uncommitted Energy Efficiency report in late June 2012. Similarly, the ICF CHP Policy Analysis has not yet been published.

To balance the need to adhere to the procedural schedule with the need to ensure access to robust data, the Environmental Parties propose a new Straw Proposal Comment date of June 29, 2012. We propose this date because the Track 2 schedule published at page 10 of the recently issued LTPP Scoping Memo appears able to accommodate the deadline extension. The ACR on the Planning Assumptions and the Energy Division Draft Scenarios would need to be moved forward, but the proposed extension still provides for two and a half months before a September 14, 2012 ruling on the scenarios.

Your consideration of this matter is greatly appreciated.

Sincerest Regards,

Kelly M. Foley

Attorney for The Vote Solar Initiative

Also On Behalf of CEERT, CEJA, IREC, NRDC and Sierra Club

2089 Tracy Court

Folsom, CA 95630

phone: 916.367.2017

fax: 520.463.7025

kelly@votesolar.org

get some sun: www.votesolar.org