

**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.

Rulemaking 12-03-014
(Filed March 22, 2012)

**WOMEN'S ENERGY MATTERS
RESPONSE TO SCE MOTION TO STRIKE
PORTIONS OF WEM'S REPLY TESTIMONY**

August 1, 2012

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**WOMEN'S ENERGY MATTERS
RESPONSE TO SCE MOTION TO STRIKE
PORTIONS OF WEM'S REPLY TESTIMONY**

Women's Energy Matters (WEM) appreciates this opportunity to reply to SCE's 7-31-12 Motion to Strike Portions of WEM's Reply Testimony.

SCE attacks WEM's Reply Testimony for responding to the Assigned Commissioner's questions in the 7-13-12 Ruling about methodologies for procuring resources, without clearly indicating how our points responded to parties' opening testimony.

We believe the relationship between this section and parties opening testimony would have been clearer if the sections that addressed the AC ruling followed, rather than preceded, the sections that replied to other matters. As an attachment to this response, we provide Revised Reply Testimony, which flips the sections, with a summary sentence about the relationship between them, as follows:

In this section of our Reply Testimony, WEM elaborates on the barriers in procurement methodology that may lead CAISO, SCE and other utilities to discount or ignore preferred resources in their opening testimony, as we noted in the section above — and how the Commission might be able to alleviate that problem. WEM Revised Reply Testimony, p. 5.

We also retitled the first section for clarity: "CAISO AND SCE DISCOUNTED PREFERRED RESOURCES" and revised the Table of Contents.

The sections are in fact related, in that the issues we discussed in the sections that SCE proposes to leave in the record discussed and cited portions of CAISO and SCE's Opening Testimony that heavily discounted or failed to consider preferred resources, and noted points of agreement about Capacity Markets. The portions that SCE wants to strike discussed barriers in procurement methodologies and underlying conceptual frameworks that lead to such discounting or ignoring of preferred resources, and how the Commission could address them.

We hope this clarifies the fact that our Reply testimony was indeed replying to other parties, and also responding to the Commissioner's questions. We regret that our Reply Testimony was not completely clear, due in part to time pressures of responding to SCE's Motion to Strike WEM's Opening Testimony, plus a very busy schedule currently

in the Energy Efficiency proceedings, and some ongoing personal issues, which were explained to the ALJ when we requested an extension of time for Opening Testimony.

Dated: August 1, 2012

Respectfully Submitted,

/s/ Barbara George

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Attachment: Women's Energy Matters Revised Reply Testimony