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August 16, 2012

Edward Randolph, Energy Division Director
California Public Utilities Commission
505 Van Ness Street
San Francisco, CA 94102

RE: Request for Extension of Time to Submit Supporting Materials, including Renewables Portfolio Standard Contracts, Associated with the 20% Renewables Portfolio Standard Closing Report

Dear Director Randolph:

On behalf of the Alliance for Retail Energy Markets (“AReM”), Constellation NewEnergy, Inc., Direct Energy Business LLC, Noble Americas Energy Solutions LLC, Shell Energy North America (US) L.P., Tiger Natural Gas, Inc., EDF Industrial Power Services (CA), LLC, and 3 Phases Renewables, LLC, I request a 30 day extension of time from August 20, 2012 to September 19, 2012, for Electric Service Providers (“ESPs”) to make the materials supporting their RPS Closing Reports, including RPS contracts, available to the Energy Division staff.¹

AReM submits this request in accordance with Ordering Paragraph 42 of Decision (“D.”) 12-06-038, which provides:

The Director of Energy Division is authorized, for good cause, to grant extensions of time to submit any reports or other documents required by this decision.

¹ According to the “Instructions” tab of the ESP RPS Closing Report template:

All ESP’s and CCA’s must submit their RPS eligible contracts to the Commission (D.12-06-038). All contract documents should be provided in a digital pdf format. Please write all documents (pdf’s) to a CD-R or DVD-R and mail to:

Robert Blackney
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

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A number of ESPs have been in contact with Energy Division staff regarding the scope of and method for making supporting materials, including RPS contracts, available for Energy Division's review. ESPs require additional time to both complete their collection of materials (having not been previously aware that such a request from Energy Division would be forthcoming), to complete electronic conversion of older supporting materials, as well determining the most effective way of making the materials available to Energy Division.

During a call with staff on August 15, 2012, it was clarified that because earlier RPS verifications were previously completed, only contracts associated with the 2007-2010 period will need to be made available for review. Additionally, the use of electronic data room access was discussed as a potentially efficient option for ESPs to make their supporting materials available to staff for review. AReM raised the issue of an extension with staff and received indication of support for an additional 30 day period to secure and make available the supporting materials with an understanding that the RPS Closing Report templates would still be submitted on the August 20, 2012 date. Accordingly, the ESPs respectfully request an extension until September 19, 2012 to secure the supporting materials and establish a means to make those materials available for Energy Division review.

Respectfully submitted,



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On behalf of the Alliance for Retail Energy Markets
and the identified ESPs

cc: Sean Simon
Robert Blackney
Service List for R.11-05-005