

**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
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**COMMUNITY ENVIRONMENTAL COUNCIL AND CLEAN COALITION
REPLY TO SCE'S MOTION TO STRIKE TESTIMONY**

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August 6, 2012

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REPLY TO SCE'S MOTION TO STRIKE TESTIMONY

The Community Environmental Council (CEC) and Clean Coalition (CCC) hereby reply to the Motion of Southern California Edison (SCE) to Strike Portions of the Reply to CEC's Motion to Compel Discovery and Production of Documents Pursuant to Rule 11.1(e).

CEC
CCC

I. Discussion

CEC

a. Community Environmental Council Reply

CEC

As the Council discussed in its responsive and relevant to this proceeding, and thus should not file numerous motions to strike filed in this proceeding, SCE's aggressive strategy to compel testimony. Beyond the issues that SCE's motions to strike raise with respect

¹ Council Reply Testimony, p. 12:

"A number of parties' opening testimony raised issues concerning California's official loading order, vis a vis LCR issues, and urged the Commission to respect the loading order. SCE is seeking authority to procure LCR through bilateral contracts and RFOs. We are proposing, in direct response¹ to SCE and other parties' opening testimony, an additional means of procuring LCR. As such, our proposal is fully within the scope of this proceeding. Moreover, the May 17 Scoping Memo states (p. 5) that the following issue is in scope for Track 1 of this proceeding:

How resources aside from conventional generation, such as uncommitted energy efficiency, demand response, energy storage and distributed generation resources should be considered in determining future local reliability needs

The Council does not oppose SCE's request for bilateral and RFO authority, but we do urge the Commission to consider the ability of a Solar/ES LCR FIT to meet, at least in part, projected LCR in the LA Basin. If the parties' and the Commission's responses to our proposal are positive, we will be happy to provide far more detail about wise design principles for the Solar/ES LCR FIT."

testimony was available to identify resources available to the community and the evidence the recently completed procurement plan for the community and the results of a reputable study by a local public resources meet LCR simply cannot be reasonably set for proceeding. Separately, the response to the specific procurement Clean Coalition at the same time also a mechanism has been thoroughly reviewed and the hands of the is thoroughly for the seek in a complete made in the direction was the in the procurement mechanism while this is a possible solution needs...”, p. 10).

The Clean Coalition also does not have any ongoing, we believe robust discussion of these issues is a net

II. Conclusion

In sum, the SCE’s motion is over the top in its aggressive the Clean Coalition is by We urge the deny the motion for filing a frivolous matter before the Commission not object to allowing the SCE to

August 6, 2012

Respectfully submitted,

By: The Community Environmental Council

Tam Hunt, Attorney

By: The Clean Coalition

_____/s/_____

Sahm White, Policy Director