

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's Own
Motion to Conduct a Comprehensive Examination of
Investor Owned Electric Utilities' Residential Rate
Structures, the Transition to Time Varying and Dynamic
Rates, and Other Statutory Obligations.

RULEMAKING 12-06-013
FILED JUNE 21, 2012

**DISTRIBUTED ENERGY CONSUMER ADVOCATES
REPLY COMMENTS IN RESPONSE TO THE ADMINISTRATIVE LAW JUDGE'S
SEPTEMBER 20, 2012 RULING SEEKING COMMENTS**

Aram Shumavon
Distributed Energy Consumer Advocates
516 Whitewood Drive
San Rafael, CA 94903
a.shumavon@d-e-c-a.org
213.784.2507

October 19, 2012

**DISTRIBUTED ENERGY CONSUMER ADVOCATES
REPLY COMMENTS IN RESPONSE TO THE ADMINISTRATIVE LAW JUDGE'S
SEPTEMBER 20, 2012 RULING SEEKING COMMENTS**

Distributed Energy Consumer Advocates (“DECA”) files these reply comments on the issues raised by parties in October 5, 2012 comments on the Administrative Law Judges September 20, 2012 ruling.

I. Background

DECA is a California-based nonprofit that advocates on behalf of residential and small commercial customers who have or seek to invest in distributed generation and demand side management infrastructure. The majority of DECA’s members are located in the footprint of California's investor owned utilities where they either currently produce and consume electricity, or consume electricity and seek to produce it as well. DECA seeks to promote the optimal regulatory climate and market in which its members and others may invest in distributed clean energy infrastructure, without preference to any single technology. DECA limits its reply comments here to the issue of schedules.

II. DECA’s Comments

DECA cautions that the “early 2013” schedule proposed by Pacific Gas & Electric (“PG&E”) in its October 5, 2012 comments is untenable.¹ While DECA supports regulatory efficiency when and were possible, the implications of fundamental changes in rate philosophies should not be undertaken without a robust deliberative process. DECA cautions that rate modeling and other market shaping activities will likely require iterative processes that reflect that diversity of parties in this proceeding including their access to resources.

¹ See PG&E's October 5, 2012 comments on refined questions and scope of the proceeding, pp.1-2.

