

**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)

**REPLY COMMENTS OF FRIENDS OF THE EARTH ON THE
PROPOSED DECISION ADOPTING LONG-TERM PROCUREMENT PLANS
TRACK 2 ASSUMPTIONS AND SCENARIOS**

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December 17, 2012

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Friends of the Earth's ("FOE") did not file Opening Comments on the Proposed Decision ("PD"), because the Standardized Planning Assumptions ("SPAs") that the PD proposes to adopt correctly prioritize the modeling of impacts from the early retirement of the San Onofre Nuclear Generating Station ("San Onofre"). FOE submits these short Reply Comments in order to rebut an unreasonable claim presented in the Opening Comments of Pacific Gas and Electric Company ("PG&E"), which repeats an earlier request from SCE seeking the right to propose assumptions and scenarios in addition to those that the PD proposes to approve. However, this would unduly and unjustifiably confuse the record and delay the proceeding.

I. NO PARTY SHOULD BE PERMITTED TO PROPOSE ITS OWN SCENARIOS OR ASSUMPTIONS

PG&E echoes a previous request from SCE to consider its own scenarios and assumptions for Track 2.¹ FOE comprehensively rebutted SCE's request in its Reply Comments on the Planning Assumptions, discussing the months-long, open and transparent process used to vet the SPAs. The PD rightfully ignores SCE's request and should do the same for PG&E's. As

¹ PG&E Opening Comments, at 5.

FOE stated in its earlier comments:

The Commission staff and the parties to the proceeding have already spent several months in an open and transparent process that is attempting to identify a reasonably narrow set of Scenarios for formal study in Track 2 of this proceeding. Indeed, the large number of Comments that the Commission received on October 5, and the additional Reply Comments ... is *prima facie* evidence that the parties have been afforded a robust opportunity to influence the range and the scope of the Scenarios to be studied.²

Given this open and transparent effort to date, PG&E's implication that there is somehow a need for more scenarios and assumptions is entirely at odds with the record of this proceeding. The Commission does not require any "help" from the utilities with alternatives that will not measure up and, moreover, that will unnecessarily clutter the record of this proceeding.

II. CONCLUSION

For the foregoing reasons, the PD should be adopted as written.

Respectfully submitted,



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² FOE Reply Comments on Planning Assumptions in LTPP, at 5 (October 19, 2012).