

**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 JUDGES'  
NOVEMBER 6, 2012 RULING INVITING COMMENTS**

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REPLY COMMENTS IN RESPONSE TO THE ADMINISTRATIVE LAW JUDGES'  
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Distributed Energy Consumer Advocates (“DECA”) replies to parties' comments here on the questions asked in the Administrative Law Judges' November 6, 2012 ruling.

**I. Background**

DECA is a nonprofit California public benefit corporation 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 throughout the state of California where they either currently produce and consume electricity, or consume electricity and are considering producing 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 comments on the finalized questions raised in the November 6, 2012 ALJ ruling.

**II. DECA's Reply Comments**

DECA comments here on the narrow issue of closing other rate-related proceedings as raised by Pacific Gas & Electric in its November 21, 2012 comments.

**Question 3. Should any of these proceedings be suspended, consolidated, or dismissed pending the resolution of this rulemaking?**

DECA cautions that closing or suspending A.10-08-005 and A.10-02-028 may create

