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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December 7, 2012

DISTRIBUTED ENERGY CONSUMER ADVOCATES REPLY COMMENTS IN RESPONSE TO THE ADMINISTRATIVE LAW JUDGES' NOVEMBER 6, 2012 RULING INVITING COMMENTS

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

undesirable time burdens in this proceeding or otherwise increase the urgency of acting in some capacity when such an outcome might otherwise be unnecessary or unwise. While DECA shares PG&E's concern that rapid changes in rate structures over time may be undesirable, this proceeding remains an inappropriate forum for advocating against a change to a proceeding that should occur inside another proceeding.

III. Conclusion

For the reasons set forth herein, DECA hereby replies to comments on the questions raised in the November 6, 2012 ruling.

Respectfully submitted this 7th day of December, 2012.

By /s/ Aram Shumayon

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