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Subject: RE: R.11-10-023, Request to schedule additional workshop

Judge Gamson,

San Diego Gas & Electric Company supports the informal recommendation of counsel for TURN below to schedule another workshop in this proceeding. We believe this would assist us in submitting more informed and helpful comments in this phase of the proceeding, particularly with respect to the promised revisions that might be made to the Energy Division proposal. Additionally, to the extent new data and information might be available and useful in assisting the parties to understand the Joint Parties' proposal, holding another workshop where such information would be presented could be useful to those parties in the same way. In many respects, the consideration of how the California ISO's identified need for resources with flexibility attributes is the most important topic the Commission has confronted since the original, basic structure of the California resource-adequacy program was adopted, and we believe a thorough vetting of the possible alternatives by which the Commission might address the ISO's needs should be facilitated in this proceeding. SDG&E acknowledges the need for expedition in this matter, but we strongly believe a workshop could be scheduled to accommodate that need.

Alvin S. Pak

Counsel for San Diego Gas & Electric Company

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----- Original Message -----

Subject: R.11-10-023, Request to schedule additional workshop

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Dear ALJ Gamson,

First, I would like to inform you that I will be taking over the attorney responsibilities in this case from Hayley Goodson. I look forward to working with you and the parties.

Second, TURN would like to offer a procedural recommendation in response to your notice last Thursday that comments were being delayed until March, after Energy Division (ED) produces a revised flexible capacity proposal. Specifically, TURN urges the scheduling of a workshop for the parties to explore ED's revised proposal before the comments are due. The workshop and comment schedule should be coordinated to give parties adequate time to review the new ED proposal before the workshop and to prepare comments after the workshop.

Further, TURN understands that in the upcoming weeks, CAISO will be generating updated data relating to the need for the Joint Parties' proposal. In addition, TURN believes there is still a need to review other aspect of the Joint Parties' proposal (some of which parties raised in their December 26 Phase 2 comments). Additional workshop time is warranted to address these matters too. Again, TURN would request that the workshop be scheduled to allow sufficient time before the workshop to review the updated CAISO data.

We appreciate the challenges the Commission faces in addressing the issues related to a new flexible capacity requirement. We offer these recommendations in the spirit of enabling the Commission to develop the necessary record on these issues as efficiently as possible.

Sincerely,

Tom Long
Legal Director
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