

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

Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider
Program Refinements, and Establish Annual
Local Procurement Obligations

R.11-10-023
(Filed October 20, 2011)

**COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
ON THE PROPOSED DECISION OF ALJ GAMSON**

CHARLES R. MIDDLEKAUFF
MARK R. HUFFMAN

Pacific Gas and Electric Company
77 Beale Street
PO Box 7442
San Francisco, CA 94120
Telephone: (415) 973-3842
Facsimile: (415) 973-0516
E-Mail: MRH2@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: February 4, 2013

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Pursuant to Rule 14 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) provides these comments on the January 14, 2013, Proposed Decision of ALJ Gamson (PD) in this proceeding.

PG&E supports the PD, and requests that the Commission adopt it, with certain technical changes described below to ensure that the Commission's and the California Independent System Operator's (CAISO) resource adequacy submittal dates are fully aligned.

The PD addresses a petition to modify that PG&E filed on July 31, 2012, requesting the Commission to modify its resource adequacy reporting timelines applicable to Commission-jurisdictional Load Serving Entities in light of changes that the CAISO was then proposing to the resource adequacy reporting timelines set forth in its tariff and Business Practice Manuals.

Since that time the Federal Energy Regulatory Commission has approved the CAISO's proposal, and the PD adopts PG&E's proposed modifications to the Commission's resource adequacy timelines in light of that fact.

Page 2 of Attachment A of the PD sets forth the new Commission deadlines that would be adopted. PG&E proposes that the following two corrections be made to those dates in the final decision. First, PG&E proposes that the due date listed for the October (second cycle) RA Filing Month be changed from August 16, 2013, to August 19, 2013. Second, PG&E proposes that the due date listed for the December (second cycle) RA Filing Month be changed from October 16, 2013, to October 17, 2013.

Without these additional changes, the adopted Commission schedule would not be fully aligned with the CAISO schedule as listed on the CAISO Reliability requirements website at: <http://www.aiso.com/Documents/2013MonthlyResourceAdequacyPlanDueDates.pdf>.

Respectfully Submitted,

CHARLES R. MIDDLEKAUFF
MARK R. HUFFMAN

By: /s/ Mark R. Huffman
 MARK R. HUFFMAN

Pacific Gas and Electric Company
77 Beale Street
PO Box 7442
San Francisco, CA 94120
Telephone: (415) 973-3842
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