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Sent: 3/22/2013 1:11:12 PM
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Bcc:

Subject: Re: R.12-06-013: Request for Extension

Marcel,

Since it appears that Rule 11.6 would not require TURN to file a motion or do more than report the results of your effort to seek agreement from parties to a requested extension of the deadline for rate design proposals, I am providing the following more detailed response from SCE in advance of your motion being made to the ALJ.

TURN requests a four-week delay to the deadline for parties' rate design proposals with a corresponding extension of all the other deadlines that were first adopted five months ago in the Scoping Memo for this proceeding. The dates for the rate design proposals and opening and reply comments on such proposals were specified in the March 19, 2013 ALJ's Ruling Requesting Residential Rate Design Proposals,

consistent with the guidance in the Scoping Memo. TURN's request would mean that all parties' rate design proposals would be due May 29, instead of May 1, 2013, and that an ALJ's proposed decision would in all likelihood be delayed from September to October, 2013.

The stated reasons for the requested delay are that TURN needs more time (1) to run the utility bill calculator models, and (2) to request other bill impact analyses from the utilities that are not supported by the bill calculator models. Only a few other parties have to date shown any interest in running SCE's bill calculator model and none have requested separate bill impact analyses that cannot be conducted using SCE's bill calculator model. It is difficult to understand why any party who has waited until now to conduct their own analyses (or use the bill calculator models), or to request analyses from the utilities for rate design proposals which are due 40 days from today, should be able to use that delay as the basis to request an additional 28 days to make their rate design proposals. PG&E indicates that it would not object to a two-week delay to the date for rate design proposals so that parties would have access to the outcome of the residential survey, but PG&E also indicates that the current schedule for the ALJ's proposed decision should not be delayed.

From the outset of this proceeding, nearly nine months ago, SCE has believed that it is important for the Commission to reach a timely decision with respect to the Commission's view of preferable rate design and policy objectives and to provide guidance to parties with respect to long-standing residential rate concerns. In light of the importance of reaching a timely final Commission decision, if any delay to the adopted schedule for rate design proposals is granted, the remainder of the schedule adopted in the March 19, 2013 ALJ's ruling should be adjusted to reach the same date for an ALJ's proposed decision. That could reasonably be accomplished through adjustments to the deadlines for opening and reply comments and the briefing cycle — assuming briefing remains necessary after parties have already served opening and reply comments — to make up for any extension of the deadline for rate design proposals.

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Date: 03/21/2013 11:31 AM

Subject: Re: R.12-06-013: Request for Extension

Good question. TURN proposes that the entire schedule be postponed by one month. Given the need to analyze other parties' proposals, I am presently not inclined to shorten the time between proposals and comments.

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Subject: Re: R.12-06-013: Request for Extension

Marcel,

It would be helpful to know what you would propose to do with the remainder of the adopted schedule, assuming a four-week extension for the rate design proposals.

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Date: 03/20/2013 05:09 PM
Subject: R.12-06-013: Request for Extension

To: Representatives of Active Parties in R.12-06-013

On May 19 the ALJ issued a Ruling setting May 1 as the due date for rate design proposals, with comments on proposals due June 3. TURN will likely request an extension of these deadlines. The current schedule does not provide sufficient time to a) run the bill calculators, and b) obtain bill impact analyses directly from utilities for rate design options not supported by the calculators. Additionally, TURN faces other procedural deadlines which limit our work on these issues. TURN will seek an extension of four weeks.

Pursuant to Rule 11.6 TURN seeks input from the 'active' parties concerning your position on the extension request. Please let me know by COB this Friday, if you a) support the proposed extension, b) oppose the proposed extension, c) are neutral, or d) support an extension for a different time period.

Thank you in advance for your responses.

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