

**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)

**RESPONSE OF THE ALLIANCE FOR RETAIL ENERGY MARKETS  
TO MOTION OF SIERRA CLUB AND THE UTILITY REFORM NETWORK  
REQUESTING EVIDENTIARY HEARINGS**

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March 18, 2013





including compliance cure periods, waiver applications, and backstop procurement mechanisms.

### III. CONCLUSION

AReM respectfully requests that the Commission consider implementation details that must be resolved if the Commission plans to move forward with incorporating flexible capacity requirements into the RA program for 2014.

Respectfully submitted,



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