

**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.

Rulemaking 11-10-023  
(Filed October 20, 2011)

**MOTION OF THE UTILITY REFORM NETWORK  
FOR LEAVE TO FILE UNDER SEAL CONFIDENTIAL ATTACHMENT 4  
TO ITS POST-WORKSHOP REPLY COMMENTS  
ON FLEXIBLE CAPACITY PROPOSALS**

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April 15, 2013

**MOTION OF THE UTILITY REFORM NETWORK  
FOR LEAVE TO FILE UNDER SEAL CONFIDENTIAL ATTACHMENT 4  
TO ITS POST-WORKSHOP REPLY COMMENTS  
ON FLEXIBLE CAPACITY PROPOSALS**

Pursuant to Rule 11.4 of the Commission's Rules of Practice and Procedure, The Utility Reform Network ("TURN") submits this motion for leave to file under seal Confidential Attachment 4 to its accompanying Post-Workshop Reply Comments on Flexible Capacity Proposals. As required by Rule 11.4, attached is a proposed order granting TURN's motion.

The requested relief is necessary because Confidential Attachment 4 includes information that is based on information derived from data request responses from Pacific Gas and Electric Company, Southern California Edison Company, and/or San Diego Gas and Electric Company that were labeled confidential by those utilities. In accordance with the non-disclosure agreements TURN signed with those utilities, TURN requests that Confidential Attachment 4 be filed under seal.

Date: April 15, 2013

Respectfully submitted,

By: \_\_\_\_\_ /s/ \_\_\_\_\_  
Thomas J. Long  
Legal Director

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**[PROPOSED] ORDER GRANTING  
MOTION OF THE UTILITY REFORM NETWORK  
FOR LEAVE TO FILE UNDER SEAL CONFIDENTIAL ATTACHMENT 4  
TO ITS POST-WORKSHOP REPLY COMMENTS  
ON FLEXIBLE CAPACITY PROPOSALS**

Good cause having been shown, the Motion of The Utility Reform Network for Leave to  
File Under Seal Confidential Attachment 4 to Its Post-Workshop Comments on Flexible  
Capacity Proposals is hereby GRANTED.

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Administrative Law Judge