



**Brian K. Cherry**  
Vice President  
Regulatory Relations

*Mailing Address*  
Mail Code B10C  
Pacific Gas and Electric Company  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415.973.7226

April 29, 2013

Maria Salinas  
California Public Utilities Commission  
Energy Division  
505 Van Ness Avenue  
San Francisco, CA 94102

**Re: PG&E's Comments on Draft Resolution E-4582**

Dear Ms. Salinas:

Pursuant to Rule 14.5 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission") and the instructions set forth in the transmittal letter from Paul Douglas dated April 9, 2013, Pacific Gas and Electric Company ("PG&E") hereby submits its comments on Draft Resolution E-4582 ("Draft Resolution"). The Draft Resolution was issued by Energy Division, and addressed recommendations on Energy Division's motion, pursuant to Decision ("D.") 10-12-048 (the "RAM Decision"). A subject index of proposed changes to the Draft Resolution is included as Appendix A to these comments and specific proposed changes to proposed findings and ordering paragraphs are included as Appendix B.

## **I. Introduction**

The Commission issued the RAM Decision on December 17, 2010, providing the broad design elements of the Renewable Auction Mechanism ("RAM") Program and requiring the investor owned utilities ("IOUs") to file advice letters proposing specific implementation details. In the RAM Decision, and Resolution E-4414 implementing that decision, the Commission delegated to Energy Division Staff the authority to recommend modifications to the RAM Program on its own motion. The Commission also provided

IOUs to propose modifications to their respective RAM Programs and Power Purchase Agreements (“PPAs”) through the advice letter process<sup>1/</sup>

On April 9, 2013, the Draft Resolution was issued by Energy Division. In general, PG&E supports the Draft Resolution and recommends a minor change to the proposed schedule of the fourth RAM auction.

## **II. RAM 4 Schedule Should Accommodate Programmatic Changes**

PG&E respectfully requests that the Commission postpone the RAM 4 auction close date by approximately two weeks. The Draft Resolution proposes that the fourth RAM solicitation close on June 28, 2013, or approximately six months following the close of the third RAM auction. PG&E proposes that the Commission adopt a fourth RAM solicitation close date on July 15, 2013. PG&E’s proposed date is necessary to accommodate review and approval of PG&E’s proposed RAM program modifications applicable to the fourth RAM solicitation.

As described above, the Commission has authorized the utilities to propose modifications to the RAM Program and PPAs through the advice letter process. Based on PG&E’s experience and lessons learned from the Third RAM Solicitation, PG&E is seeking modifications to the Fourth RAM solicitation as part of its Tier 2 advice letter filing applicable to the Third RAM solicitation, which to be filed on April 30, 2013 (“RAM 3 Advice Letter”).

Protests to PG&E’s RAM 3 Advice Letter will be due on or before May 20, 2013. Pursuant to Energy Division Rule 5.2 of General Order 96-B, PG&E’s RAM 3 Advice Letter will not be effective until after staff approval. Following staff review and approval, PG&E also will need time to modify its RAM Protocol and PPA in advance of the solicitation to incorporate programmatic changes. Accordingly, PG&E proposes that the fourth RAM solicitation auction close on July 15, 2013.

## **III. Conclusion**

PG&E suggests one minor schedule change to the Draft Resolution to ensure that there is adequate time for stakeholders to review PG&E’s proposed RAM Program changes, and for PG&E to incorporate any approved RAM Program changes into the fourth RAM auction protocols and PPA. Accordingly, the Commission should modify the Draft Resolution as shown in Appendix B to this letter.

---

1/ RAM Decision at Ordering Paragraph 5.

Sincerely,



Vice President – Regulatory Relations

cc: Commissioner Michael Peevey  
Commissioner Mark Ferron  
Commissioner Mike Florio  
Commissioner Catherine Sandoval  
Commissioner Carla Peterman  
Edward Randolph – Director, Energy Division  
Karen Clopton – Chief Administrative Law Judge  
Frank Lindh – General Counsel  
Maria Salinas – Energy Division  
Adam Schultz – Energy Division  
Paul Douglas - Energy Division  
Service List for Draft Resolution E-4582

Attachment:

**Appendix A –Subject Index**  
**Appendix B – Recommended Changes**

**Appendix A to PG&E Comments on Draft Resolution E-4582**

Page 6. [(1) Modifying the capacity allocation targets for RAM 4]. Revise to strike “June 28, 2013” date and replace with “July 15, 2013”

**Appendix B to PG&E Comments on Draft Resolution E-4582**  
**Proposed Changes to Findings and Orders**

Consistent with its comments on the Draft Resolution, PG&E recommends that the Commission make the following changes to the Findings, Conclusions, and Ordering Paragraphs in the Draft Resolution prior to issuance:

**Findings and Conclusions**

5. It would be consistent with the intent of Decision 10-12-048 for the fourth RAM auction to close on ~~June 28, 2013~~ July 15, 2013, approximately six months after the close of the third RAM auction.

**Ordering Paragraphs**

1. The fourth Renewable Auction Mechanism solicitation authorized for Southern California Edison Company, San Diego Gas and Electric Company, and Pacific Gas and Electric Company shall close by ~~June 28, 2013~~ July 15, 2013.

## CERTIFICATE OF SERVICE

I certify that I have by mail, e-mail, or hand delivery this day served a true copy of Pacific Gas and Electric Company's comments on Draft Resolution E-4582 on:

- 1) Commissioner Michael Peevey
- 2) Commissioner Mark Ferron
- 3) Commissioner Mike Florio
- 4) Commissioner Catherine Sandoval
- 5) Commissioner Carla Peterman
- 6) Edward Randolph – Director, Energy Division
- 7) Karen Clopton – Chief Administrative Law Judge
- 8) Frank Lindh – General Counsel
- 9) Maria Salinas – Energy Division
- 10) Adam Schultz – Energy Division
- 11) Paul Douglas - Energy Division
- 12) Service List for Draft Resolution E-4582

/S/ KIMBERLY CHANG

Kimberly Chang

PACIFIC GAS AND ELECTRIC COMPANY

Date: April 29, 2013