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Subject: A.12-12-002, PG&E's 2013 RDW: Should The Current Schedule Be Postponed Due to Delays in the E3 NEM Study?

Parties to A.12-12-002, PG&E's 2013 Rate Design Window Proceeding, Looking at Whether an "Option R" Rate Should Be Adopted For Large Solar Customers

I solicit your feedback on whether the procedural schedule for this case adopted in the February 14 Scoping Memorandum should be postponed to allow the CPUC to consider and make use of a highly relevant cost-benefit study being prepared by and for the Commission that is now scheduled to be completed after the hearings in this case are over, and while the briefing is underway.

As we discussed at the Prehearing Conference, the CPUC has contracted with Energy and Environmental Economics (E3) to provide an evaluation of the costs and benefits of the Net Energy Metering (NEM) program, including an analysis of costs and benefits of service to customers that do not export to the grid, under various rate schedules. This study is required by Assembly Bill 2514 (Bradford, 2012) and Commission Decision (D.) 12-05-036, and is highly relevant to the issues in this case. Last week, Ehren Seybert informed us of the new schedule for completion of that the study, which is behind schedule. Currently, Energy Division anticipates that a draft of the study will be released for public comment in late June/July, with the final version anticipated to be released in late July/August. Unfortunately, the current schedule for this RDW case called for intervenor testimony on May 10, rebuttal testimony is due June 14, hearings are scheduled for July 8-12, and briefs are due in August.

Under this schedule, the Commission/E3 study would be finalized during the briefing stage of this case. It makes more sense for the parties to have a chance to address the results of the E3 study in their testimony and in the hearings, as well as in their briefs. Accordingly, we suggest that all dates in the case be postponed to allow use of the E3 study results. SEIA and WalMart have already filed opening testimony, and so we should give them the opportunity to update their testimony with E3 results, if they so desire. Dates for rebuttal testimony, hearings, and briefs should be postponed to new dates after the updated opening testimony is served.

Under Rule 11.6, parties proposing motions for an extension of time should first make a good-faith effort to ask the parties to agree to an extension, and then report the results of that effort when it makes its request. Accordingly, please let me know if you support or oppose this proposal to postpone the current schedule in this case to allow the parties to address the E3 study results in their testimony, hearings, and briefs. If possible, please let me know your thoughts by the close of business this Friday, May 24.

Thanks.

Randy Litteneker

Counsel for PG&E