

May 21, 2013

VIA E-MAIL & U.S. MAIL

Administrative Law Judge Regina DeAngelis
Administrative Law Judge Anne E. Simon
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: R.11-05-005 Request for Extension of Time to File Proposed 2013 Renewables Portfolio Standard ("RPS") Procurement Plans Pursuant to Assigned Commissioner's May 10, 2013 Ruling (the "ACR")¹

Dear Administrative Law Judges DeAngelis and Simon:

Pursuant to Rule 11.6 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, Southern California Edison Company ("SCE"), Pacific Gas and Electric Company ("PG&E"), and San Diego Gas & Electric Company ("SDG&E") (jointly, "the IOUs") hereby request an extension of the date for filing of the proposed 2013 RPS Procurement Plans² for each load-serving entity who must file such a plan pursuant to the ACR by two (2) weeks to **June 28, 2013** in accordance with the revised schedule attached hereto as **Exhibit A**. The IOUs also request corresponding two (2) week extensions to other dates in the procedural schedule for the 2013 RPS Procurement Plans as set forth in **Exhibit A**. As the revised schedule demonstrates, the IOUs believe that this extension of time would neither delay the date upon which the Commission could issue a proposed decision nor extend the date upon which the IOUs may issue requests for offers as part of their 2013 solicitations.

The IOUs seek to extend the due date for the 2013 RPS Procurement Plans because the current timeframe for developing the plans is insufficient for the IOUs to provide a thorough and accurate product. The ACR contains requirements that necessitate coordination amongst the IOUs and Energy Division Staff before the RPS Procurement Plans may be prepared. Further, some elements of the RPS Procurement Plans cannot be completed in parallel, but must instead be completed in sequence to ensure that the various elements of the final proposed RPS Plans are internally consistent, as required by the ACR. The ACR also adds new requirements to the 2013 RPS Procurement Plans, when compared

¹ See Assigned Commissioner's Ruling Identifying Issues and Schedule of Review for 2013 Renewables Portfolio Standard Procurement Plans Pursuant to Public Utilities Code Sections 399.11 et seq. and Requesting Comments on a New Proposal (dated May 10, 2013).

² Pursuant to Attachment A to the ACR (Procedural Schedule for the 2013 Renewables Portfolio Standard Procurement Plans), IOUs, small utilities, and electric service providers must file proposed annual RPS Procurement Plans by June 14, 2013.



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to the 2012 RPS Plan template, and the same employees preparing these new sections are the experts also needed to update the prior sections.

For instance, pursuant to the cost quantification requirement included in the ACR, the IOUs must provide information on total dollars expended on all RPS-eligible generation in the past, future forecast expenditures, and forecasted annual rate impacts for this generation. The IOUs are required to coordinate with Energy Division Staff to provide responses using a standardized methodology and format. In recent communications with Energy Division Staff, they requested that the IOUs coordinate amongst themselves to modify last year's template to accommodate the information requested in this year's RPS Plans. Once a template/format is agreed upon, the IOUs have been directed to submit that template to the Energy Division Staff for review to ensure that it is consistent with the direction provided in the ACR. Given the IOUs' experience with the template used for last year's RPS Plans, this process alone is expected to take several weeks to complete.

Finally, the IOUs' requested extension should not delay any Commission actions or prejudice any party. The IOUs emailed the service list on May 17, 2013 to determine whether any party objected to this extension request. No party objected to the request. Jan Reid, Bear Valley Electric Service, and Shell Energy supported the IOUs' extension request. Additionally, The Utility Reform Network, Commerce Energy, Inc., and the Center for Biological Diversity stated that they do not oppose the IOUs' extension request.

The IOUs appreciate your consideration of this request.

Respectfully submitted on behalf of the IOUs,

By: 
Cathy Karlstad

Senior Attorney

Southern California Edison Company

2244 Walnut Grove Avenue

Post Office Box 800

Rosemead, CA 91770

Telephone: (626) 302-1096

Facsimile: (626) 302-6962

E-mail: Cathy.Karlstad@sce.com

cc: Service List for R.11-05-005

Exhibit A

Row #	ITEM	DATE
1	Assigned Commissioner's Ruling setting scope and schedule for annual Procurement Plans	5/10/13
2	Pacificorp file supplement to 2013 IRP	5/30/13
3	IOUs, Small Utilities, and ESPs file proposed annual RPS Procurement Plans	6/14/13 <u>6/28/13</u>
4	Party Comments on RPS Plans, IRP (including Supplement) and Proposals	6/28/13 <u>7/12/13</u>
5	Motions requesting evidentiary hearing (note: If a motion is filed and granted, the ALJ may need to issue a revised schedule.)	7/3/13 <u>7/17/13</u>
6	Reply comments on RPS Plans, IRP and Proposals	7/8/13 <u>7/22/13</u>
7	Motion to update RPS Plans [note 1 below]	8/14/13 <u>8/28/13</u>
8	Projected date for issuance of Proposed Decision	3rd Quarter 2013 <u>October,</u> <u>2013</u>
9	Projected date for Commission vote on Proposed Decision	4th Quarter 2013
10	IOUs issue Request For Offers for Solicitations or otherwise pursue approved RPS Procurement Plan	4th Quarter 2013

[1] Updates are not intended to the form and format of the plan but may be appropriate for limited elements based on changed circumstances or recent information (e.g., new legislation, recent Commission decision, new regulation of the California Independent System Operator, harmonization of definitions within contract for specific terms).