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Cc:

Bcc:

Subject: R.12-06-013: Request for Extension of Time to file Comments on Residential Rate Design proposals

Dear ALJ McKinney:

On behalf of Vote Solar and the parties listed below, we respectfully request that the date for filing comments on the parties' residential rate design proposals be extended from July 1 to July 12. We believe that an extension of time is warranted for several reasons (other than the rescheduling of the initial workshop).

First, as you noted in your Ruling, few parties provided illustrative rates and bill impacts, making it difficult to determine (and comment upon) the impacts on bills, CARE, distributed generation, etc. that may result from the adoption of their varying rate design proposals. We appreciate that you have asked the parties to provide this information by June 21, but that leaves little time left to incorporate this important information into comments.

Second, with comments due on July 1, there is insufficient time for the parties to send, and more important, receive answers to data requests about other parties' proposals. Not only are we concerned that new information will be provided at the workshop that will require further analysis prior to filing comments, but we expect questions to be raised at the workshop that will require parties to perform and distribute further calculations and information, which likely will not be available in sufficient time for meaningful inclusion in comments due July 1.

Finally, we are hopeful that as parties have a chance to thoroughly review other parties' proposals, and explore those proposals further at the workshop, parties will begin to talk about the possibility of collaborating on revised proposals. Unfortunately, we expect that with comments due less than a week after the workshop, parties will be forced to focus all their attention on preparing comments supporting their own specific proposals rather than discussing more collaborative, revised proposals with other parties.

For all these reasons, we respectfully request that the comment period be extended from July 1 to July 12.

As required by Rule 11.6, I contacted all the parties to this proceeding (by email) to

determine their support for this proposal. The following parties expressed support: Vote Solar, SEIA, Sierra Club, EDF, TURN, DRA, IREC and CforAT. The following parties stated they did not oppose the request: CLECA, MEA, CCSE, SDCAN and Greenlining. I did not receive any response from PG&E, SCE or SDG&E or any of the other parties.

Thank you for your consideration of our request.

Ron Liebert

Attorney for Vote Solar

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Thank you.