

From: Raya Salter
Sent: 6/18/2013 3:11:32 PM
To: Warner, Christopher (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=CJW5); Matthew Freedman (matthew@turn.org); Charlie Buck (charlie.buck@energycenter.org); bcragg@goodinmacbride.com (bcragg@goodinmacbride.com); atrowbridge@daycartermurphy.com (atrowbridge@daycartermurphy.com); Ron Liebert (rl@eslawfirm.com); Jeanne McKinney (jeanne.mckinney@cpuc.ca.gov); Diane.Fellman@nrgenergy.com (Diane.Fellman@nrgenergy.com); Eric@CoalitionofEnergyUsers.org (Eric@CoalitionofEnergyUsers.org); Bob.Dodds@liberty-energy.com (Bob.Dodds@liberty-energy.com); Bustamante, Claudia (/O=PG&E/OU=Corporate/cn=Recipients/cn=C4BO); Ekelly@MarinEnergy.com (Ekelly@MarinEnergy.com); CentralFiles@SempraUtilities.com Files (CentralFiles@SempraUtilities.com); Chuck Manzuk (CManzuk@semprautilities.com); Erica Schroeder (ESchroeder@kfwlaw.com); faith.mabuhayalliance@gmail.com (faith.mabuhayalliance@gmail.com); Haertle, Steve (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=SRH1);
Cc: RegRelCPUCCases (/O=PG&E/OU=Corporate/cn=Recipients/cn=RegRelCPUCCases); jcorralejo@lbcgla.org (jcorralejo@lbcgla.org); SRahon@SempraUtilities.com (SRahon@SempraUtilities.com); wwright@sunrunhome.com (wwright@sunrunhome.com); TBrill@SempraUtilities.com (TBrill@SempraUtilities.com); Joelle.Steward@PacifiCorp.com (Joelle.Steward@PacifiCorp.com); fadia.khoury@sce.com (fadia.khoury@sce.com); Lynn.Marshall@Energy.Ca.Gov (Lynn.Marshall@Energy.Ca.Gov); Nick.Pappas@asm.ca.gov (Nick.Pappas@asm.ca.gov); JWaen@MarinEnergy.com (JWaen@MarinEnergy.com); Vidhya Prabhakaran (vidhyaprabhakaran@dwt.com); Rachel Gold (Rachel@consciousventuresgroup.com); TLindl@kfwlaw.com Lindl (TLindl@kfwlaw.com); Jamie K York (JYork@semprautilities.com); Cherry, Brian K (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7); Tran, Ava N. (ava.tran@cpuc.ca.gov); cem@newsdata.com (cem@newsdata.com); case.admin@sce.com (case.admin@sce.com); brian.theaker@nrgenergy.com (brian.theaker@nrgenergy.com); akbar.jazayeri@sce.com (akbar.jazayeri@sce.com); bruce.reed@sce.com (bruce.reed@sce.com); cathie.allen@pacificorp.com (cathie.allen@pacificorp.com); dan.delurey@drsgcoalition.org (dan.delurey@drsgcoalition.org); cfang@semprautilities.com (cfang@semprautilities.com); O'Donnell, Arthur J. (Arthur.O'Donnell@cpuc.ca.gov); cathy.zhang@soundofhope.org (cathy.zhang@soundofhope.org); chris_king@siemens.com (chris_king@siemens.com); carlierfrancois@yahoo.fr (carlierfrancois@yahoo.fr); allenmcw@comcast.net (allenmcw@comcast.net); ahmad.faruqui@brattle.com (ahmad.faruqui@brattle.com); barbara@barkovichandyap.com (barbara@barkovichandyap.com); cpuc@libertyutilities.com (cpuc@libertyutilities.com); b.bordine@d-e-c-a.org (b.bordine@d-e-c-a.org); Bill

Marcus (bill@jbsenergy.com); akp.servicelist@gmail.com (akp.servicelist@gmail.com); Christopher Danforth (christopher.danforth@cpuc.ca.gov); Dexter Khoury (dexter.khoury@cpuc.ca.gov); Andy Katz (andykatz@sonic.net); Andy Schwartz (aschwartz@solarcity.com); blaising@braunlegal.com Blaising (blaising@braunlegal.com); Danielle Osborn Mills (Danielle@ceert.org) (danielle@ceert.org); david@ceert.org Miller (david@ceert.org); Curt Barry (cbarry@iwpnews.com); alewis@naacoalition.org (alewis@naacoalition.org) (alewis@naacoalition.org); Christopher Villarreal (christopher.villarreal@cpuc.ca.gov); Robert Benjamin (robert.benjamin@cpuc.ca.gov); Weidemann, Mareijke (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=M2W8); Marcel Hawiger (Marcel@turn.org); joyw@mid.org (joyw@mid.org); filings@a-klaw.com (filings@a-klaw.com); mtierney-lloyd@enernoc.com (mtierney-lloyd@enernoc.com); mrw@mrwassoc.com (mrw@mrwassoc.com); jarmstrong@goodinmacbride.com (jarmstrong@goodinmacbride.com); Rahman, Junaid (junaid.rahman@cpuc.ca.gov); lindaf@mid.org (lindaf@mid.org); lencanty@BlackEconomicCouncil.org (lencanty@BlackEconomicCouncil.org); jleslie@mckennalong.com (jleslie@mckennalong.com); nguyen.quan@gswater.com (nguyen.quan@gswater.com); jimin@mid.org (jimin@mid.org); njohnson@consumercal.org (njohnson@consumercal.org); jeannetteo@moval.org (jeannetteo@moval.org); Watts-Zagha, Karen Camille (KarenCamille.Watts-Zagha@cpuc.ca.gov); nicole@braunlegal.com (nicole@braunlegal.com); holly@SunrunHome.com (holly@SunrunHome.com); dhilla@consumercal.org (dhilla@consumercal.org); patrick.saxton@energy.ca.gov (patrick.saxton@energy.ca.gov); nbrockway@aol.com (nbrockway@aol.com); michaelperry@fscgroup.com (michaelperry@fscgroup.com); jkeyes@kfwlaw.com (jkeyes@kfwlaw.com); ed@temix.com (ed@temix.com); michaelsullivan@fscgroup.com (michaelsullivan@fscgroup.com); markw@corchurch.org (markw@corchurch.org); kfox@kfwlaw.com (kfox@kfwlaw.com); kerry.hattevik@nee.com (kerry.hattevik@nee.com); Laura Wisland (lwisland@ucsusa.org); SFOCPUCDockets (dwtcpucdockets@dwt.com); joshbode@fscgroup.com (joshbode@fscgroup.com); Enrique Gallardo (enriqueg@greenlining.org); James Weil (jweil@aglet.org); Hayley Goodson (hayley@turn.org); Lynn Haug (lmh@eslawfirm.com); eric.wright@bves.com (eric.wright@bves.com); douglass@energyattorney.com Douglass (douglass@energyattorney.com); nes@a-klaw.com Sheriff (nes@a-klaw.com); Gregory Heiden (gregory.heiden@cpuc.ca.gov); Kevin Woodruff (kdw@woodruff-expert-services.com); kkiener@solarelectricpower.org (kkiener@solarelectricpower.org); erin@falquier.com (erin@falquier.com); fwahl@svlg.org (fwahl@svlg.org); Matt Vespa (matt.vespa@sierraclub.org); Michael Shames (michael@SanDiegoCAN.org); David Wooley (dwooley@kfwlaw.com); James Fine (jfine@edf.org); Jamie L. Mauldin (jmauldin@adamsbroadwell.com); dmarcus2@sbcglobal.net (ABJ&C) (dmarcus2@sbcglobal.net); ek@a-klaw.com Kahl (ek@a-klaw.com); liddell@energyattorney.com Liddell (liddell@energyattorney.com); Michele Kito (michele.kito@cpuc.ca.gov); Marc Joseph (mdjoseph@adamsbroadwell.com);

Gabriel Petlin (gabriel.petlin@cpuc.ca.gov); Gayatri Schilberg (gayatri@jbsenergy.com); Daniel Chia (dchia@solarcity.com); kmills@cfbf.com Karen (kmills@cfbf.com); Jim Lazar (jim@jimlazar.com); Lee-Whei Tan (lee-whei.tan@cpuc.ca.gov); Devla Singh (devla.singh@cpuc.ca.gov); Dan Willis (Dan.Willis@cpuc.ca.gov); Elise Torres (elise.torres@cpuc.ca.gov); Jack Clark (Jack.Clark@energycenter.org); Hazlyn Fortune (hazlyn.fortune@cpuc.ca.gov); Horner, Trina (/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=TNHC); sue.mara@RTOadvisors.com (sue.mara@RTOadvisors.com); service@cforat.org (service@cforat.org); RobertGnaizda@gmail.com (RobertGnaizda@gmail.com); Samson, Renee (/O=PG&E/OU=Corporate/cn=Recipients/cn=r5sz); steve@bakerstreetpublishing.com (steve@bakerstreetpublishing.com); russell.garwacki@sce.com (russell.garwacki@sce.com); paul.pietsch@drsgcoalition.org (paul.pietsch@drsgcoalition.org); Tarasova, Catherine (/O=PG&E/OU=Corporate/cn=Recipients/cn=yxt537641601); rick@votesolar.org (rick@votesolar.org); samholmberg@fscgroup.com (samholmberg@fscgroup.com); sean.beatty@nrgenergy.com (sean.beatty@nrgenergy.com); sarah.wallace@pacificorp.com (sarah.wallace@pacificorp.com); policy@efficiencycouncil.org (policy@efficiencycouncil.org); sdalal@sfwater.org (sdalal@sfwater.org); St. Marie, Stephen (Stephen.St.Marie@cpuc.ca.gov); Stephanie Chen (stephaniec@greenlining.org); sswaroop@marinenergy.com (sswaroop@marinenergy.com); Steven Kelly (Steven@iepa.com); Marzia Zafar (marzia.zafar@cpuc.ca.gov); Sullivan, Timothy J. (timothy.sullivan@cpuc.ca.gov); Scott Murtishaw (scott.murtishaw@cpuc.ca.gov); Tom Beach (tomb@crossborderenergy.com); Rebecca Lee (rebecca.lee@cpuc.ca.gov); stephengeorge@fscgroup.com (stephengeorge@fscgroup.com); Susannah Churchill (susannah@votesolar.org); ssmyers@att.net Myers (ssmyers@att.net); James Fine (jfine@edf.org); Valerie Kao (valerie.kao@cpuc.ca.gov); Thad Culley (tculley@kfwlaw.com); Sheridan Pauker (SPauker@wsgr.com); Sheryl Carter (scarter@nrdc.org); Sachu Constantine (sachu.constantine@energycenter.org); Siobhan Foley (siobhan.foley@energycenter.org); sbirmingham@seia.org Birmingham (SBirmingham@seia.org); Robert Levin (robert.levin@cpuc.ca.gov); Timothy Treadwell (Timothy.Treadwell@energycenter.org); Terry Clapham (Terry.Clapham@energycenter.org); Zhen Zhang (Zhen.Zhang@cpuc.ca.gov); Syreeta Gibbs (syreeta.gibbs@cpuc.ca.gov); Rajan Mutialu (rajan.mutialu@cpuc.ca.gov); Sephra Ninow (Sephra.Ninow@energycenter.org)

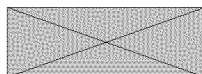
Bcc:

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

EDF also supports TURN's comments (below), which support the Vote Solar request to extend the due date for opening comments and would allow the IOUs to provide their additional bill impact information on July 2 with opening comments due on July 12.

Regards,

Raya Salter



Raya Salter
Sr. Regulatory Attorney

Energy Program

Environmental Defense Fund
257 Park Avenue South

17th Floor
New York, NY 10010
T 212 616 1320

C 917 474 2267
F 212 505 2375
rsalter@edf.org
edf.org

From: Charlie Buck [mailto:Charlie.Buck@energycenter.org]

Sent: Tuesday, June 18, 2013 6:07 PM

To: Matthew Freedman; Warner, Christopher (Law)

Cc: Ron Liebert; Jeanne McKinney; atrowbridge@daycartermurphy.com; BCragg@GoodinMacbride.com; Bob.Dodds@liberty-energy.com; Claudia Bustamante; Chuck Manzuk; CentralFiles@SempraUtilities.com Files; Diane.Fellman@nrgenergy.com; Erica Schroeder; Ekelly@MarinEnergy.com; Eric@CoalitionofEnergyUsers.org; Fadia.Khoury@sce.com; Faith.MabuhayAlliance@gmail.com; JCorralejo@LBCgla.org; JWaen@MarinEnergy.com; Jamie K York; Joelle.Steward@PacifiCorp.com; Lynn.Marshall@Energy.Ca.Gov; Nick.Pappas@asm.ca.gov; Rachel Gold; RegRelCPUCcases; Steve Haertle; SRahon@SempraUtilities.com; TBrill@semprautilities.com; TLindl@kfwlaw.com Lindl; Vidhya Prabhakaran; wwright@sunrunhome.com; ahmad.faruqui@brattle.com; akbar.jazayeri@sce.com; akp.ServiceList@gmail.com; alewis@naacoalition.org (alewis@naacoalition.org); allenmcw@comcast.net; Andy Katz; O'Donnell, Arthur J.; Andy Schwartz; Tran, Ava N.; b.bordine@d-e-c-a.org; barbara@barkovichandyap.com; Bill Marcus; Robert Benjamin; Cherry, Brian K; blaising@braunlegal.com Blaising; brian.theaker@nrgenergy.com; bruce.reed@sce.com; Dexter Khoury; carlierfrancois@yahoo.fr; case.admin@sce.com; cathie.allen@pacificcorp.com; cathy.zhang@soundofhope.org; Curt Barry; cem@newsdata.com; cfang@semprautilities.com; chris_king@siemens.com; cpuc@libertyutilities.com; Christopher Villarreal; Christopher Danforth; dan.delurey@drsgcoalition.org; Danielle Osborn Mills (Danielle@ceert.org); david@ceert.org Miller; Daniel Chia; dhilla@consumercal.org; dmarcus2@sbcglobal.net (ABJ&C); douglass@energyattorney.com Douglass; Devla Singh; Dan Willis; David Wooley; SFOCPUCDockets; ed@temix.com; ek@a-klaw.com Kahl; Enrique Gallardo; eric.wright@bves.com; erin@falquier.com;

Elise Torres; filings@a-klaw.com; fwahl@svlg.org; Gayatri Schilberg; Gabriel Petlin; Gregory Heiden; Hayley Goodson; Hazlyn Fortune; holly@SunrunHome.com; Jack Clark; jarmstrong@goodinmacbride.com; jeannetteo@moval.org; James Fine; Jim Lazar; jimin@mid.org; jkeyes@kfwlaw.com; JLeslie@McKennaLong.com; Jamie L. Mauldin; Rahman, Junaid; joshbode@fscgroup.com; joyw@mid.org; James Weil; Kevin Woodruff; kerry.hattevik@nee.com; kfox@kfwlaw.com; kkiener@solarelectricpower.org; kmills@cfbf.com Karen; Watts-Zagha, Karen Camille; lencanty@BlackEconomicCouncil.org; liddell@energyattorney.com Liddell; lindaf@mid.org; Lynn Haug; Laura Wisland; Lee-Whei Tan; Mareijke Weidemann; Marcel Hawiger; markw@corchurch.org; Matt Vespa; Marc Joseph; Michael Shames; michaelperry@fscgroup.com; michaelssullivan@fscgroup.com; Michele Kito; mrw@mrwassoc.com; mtierney-lloyd@enernoc.com; nbrockway@aol.com; nes@a-klaw.com Sheriff; nguyen.quan@gswater.com; nicole@braunlegal.com; njohnson@consumercal.org; patrick.saxton@energy.ca.gov; paul.pietsch@drsgcoalition.org; policy@efficiencycouncil.org; Renee Samson; rick@votesolar.org; Robert Levin; Rajan Mutialu; robertgnaizda@gmail.com; Raya Salter; russell.garwacki@sce.com; Sachu Constantine; samholmberg@fscgroup.com; sarah.wallace@pacificcorp.com; sbirmingham@seia.org Birmingham; Sheryl Carter; sdalal@sfwater.org; sean.beatty@nrgenergy.com; Sephra Ninow; service@cforat.org; Scott Murtishaw; Siobhan Foley; Sheridan Pauker; ssmyers@att.net Myers; St. Marie, Stephen; sswaroop@marinenergy.com; Stephanie Chen; stephengeorge@fscgroup.com; steve@bakerstreetpublishing.com; Steven Kelly; sue.mara@RTOadvisors.com; Susannah Churchill; Syreeta Gibbs; Thad Culley; Terry Clapham; Timothy Treadwell; Sullivan, Timothy J.; Trina Horner; Tom Beach; Valerie Kao; Rebecca Lee; Catherine Tarasova; Marzia Zafar; Zhen Zhang
Subject: RE: R.12-06-013: Request for Extension of Time to file Comments on Residential Rate Design proposals

CCSE seconds TURN's comments below.

Charlie Buck

California Center for Sustainable Energy

Phone: 858.633.1392

From: Matthew Freedman [mailto:matthew@turn.org]

Sent: Tuesday, June 18, 2013 2:58 PM

To: Warner, Christopher (Law)

Cc: Ron Liebert; Jeanne McKinney; atrowbridge@daycartermurphy.com;

BCragg@GoodinMacbride.com; Bob.Dodds@liberty-energy.com; Claudia Bustamante; Chuck Manzuk;

CentralFiles@SempraUtilities.com Files; Diane.Fellman@nrgenergy.com; Erica Schroeder;

Ekelly@MarinEnergy.com; Eric@CoalitionofEnergyUsers.org; Fadia.Khoury@sce.com;

Faith.MabuhayAlliance@gmail.com; JCorralejo@LBCgla.org; JWaen@MarinEnergy.com; Jamie K

York; Joelle.Steward@PacifiCorp.com; Lynn.Marshall@Energy.Ca.Gov; Nick.Pappas@asm.ca.gov;

Rachel Gold; RegRelCPUCCases; Steve Haertle; SRahon@SempraUtilities.com;

TBrill@semprautilities.com; TLindl@kfwlaw.com Lindl; Vidhya Prabhakaran;

wwright@sunrunhome.com; ahmad.faruqui@brattle.com; akbar.jazayeri@sce.com;

akp.ServiceList@gmail.com; alewis@naacoalition.org (alewis@naacoalition.org);

allenmcw@comcast.net; Andy Katz; O'Donnell, Arthur J.; Andy Schwartz; Tran, Ava N.; b.bordiine@d-e-

c-a.org; barbara@barkovichandyap.com; Bill Marcus; Robert Benjamin; Cherry, Brian K;

blaising@braunlegal.com Blaising; brian.theaker@nrgenergy.com; bruce.reed@sce.com; Dexter

Khoury; carlierfrancois@yahoo.fr; case.admin@sce.com; cathie.allen@pacificcorp.com; cathy.zhang@soundofhope.org; Curt Barry; cem@newsdata.com; cfang@semprautilities.com; Charlie Buck; chris_king@siemens.com; cpuc@libertyutilities.com; Christopher Villarreal; Christopher Danforth; dan.delurey@drsgcoalition.org; Danielle Osborn Mills (Danielle@ceert.org); david@ceert.org Miller; Daniel Chia; dhillia@consumercal.org; dmarcus2@sbcglobal.net (ABJ&C); douglass@energyattorney.com Douglass; Devla Singh; Dan Willis; David Wooley; SFOCPUCDockets; ed@temix.com; ek@a-klaw.com Kahl; Enrique Gallardo; eric.wright@bves.com; erin@falquier.com; Elise Torres; filings@a-klaw.com; fwahl@svlg.org; Gayatri Schilberg; Gabriel Petlin; Gregory Heiden; Hayley Goodson; Hazlyn Fortune; holly@SunrunHome.com; Jack Clark; jarmstrong@goodinmacbride.com; jeannetteo@moval.org; James Fine; Jim Lazar; jimin@mid.org; jkeyes@kfwlaw.com; JLeslie@McKennaLong.com; Jamie L. Mauldin; Rahman, Junaid; joshbode@fscgroup.com; joyw@mid.org; James Weil; Kevin Woodruff; kerry.hattevik@nee.com; kfox@kfwlaw.com; kkiener@solarelectricpower.org; kmills@cfbf.com Karen; Watts-Zagha, Karen Camille; lencanty@BlackEconomicCouncil.org; liddell@energyattorney.com Liddell; lindaf@mid.org; Lynn Haug; Laura Wisland; Lee-Whei Tan; Mareijke Weidemann; Marcel Hawiger; markw@corchurch.org; Matt Vespa; Marc Joseph; Michael Shames; michaelperry@fscgroup.com; michaelsullivan@fscgroup.com; Michele Kito; mrw@mrwassoc.com; mtierney-lloyd@enernoc.com; nbrockway@aol.com; nes@a-klaw.com Sheriff; nguyen.quan@gswater.com; nicole@braunlegal.com; njohnson@consumercal.org; patrick.saxton@energy.ca.gov; paul.pietsch@drsgcoalition.org; policy@efficiencycouncil.org; Renee Samson; rick@votesolar.org; Robert Levin; Rajan Mutialu; robertgnaizda@gmail.com; Raya Salter; russell.garwacki@sce.com; Sachu Constantine; samholmberg@fscgroup.com; sarah.wallace@pacificcorp.com; sbirmingham@seia.org Birmingham; Sheryl Carter; sdalal@sfgwater.org; sean.beatty@nrgenergy.com; Sephra Ninow; service@cforat.org; Scott Murtishaw; Siobhan Foley; Sheridan Pauker; ssmyers@att.net Myers; St. Marie, Stephen; sswaroop@marinenergy.com; Stephanie Chen; stephengeorge@fscgroup.com; steve@bakerstreetpublishing.com; Steven Kelly; sue.mara@RTOadvisors.com; Susannah Churchill; Syreeta Gibbs; Thad Culley; Terry Clapham; Timothy Treadwell; Sullivan, Timothy J.; Trina Horner; Tom Beach; Valerie Kao; Rebecca Lee; Catherine Tarasova; Marzia Zafar; Zhen Zhang
Subject: Re: R.12-06-013: Request for Extension of Time to file Comments on Residential Rate Design proposals

ALJ McKinney and parties to R.12-06-013,

TURN supports the request of Vote Solar for an extension of time for opening comments.

TURN is also amenable to an extension of the deadline for the IOUs to file additional information relating to the bill impacts of their rate proposals. However, it would be unreasonable to have the IOUs provide this information only four days before parties are expected to provide comments. It would be far more appropriate to preserve the current 10-day gap between the provision of additional information by the IOUs and the submission of opening comments by parties. Therefore, TURN supports allowing the IOUs to provide their additional information on July 2 with opening comments due on July 12.

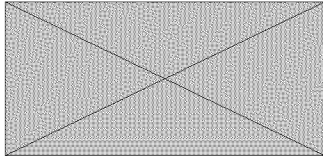
Matthew Freedman

Staff Attorney

The Utility Reform Network

matthew@turn.org

415-954-8084



On Jun 18, 2013, at 2:25 PM, Warner, Christopher (Law) wrote:

TO: ALJ McKinney and parties to R.12-06-013

PG&E, SCE and SDG&E support Vote Solar et al's request for an extension of time for opening comments in this proceeding from July 1, to July 12, provided also that the June 21 deadline in the ALJ's June 13 Ruling for the IOUs to file their "Response to ALJ's Request for Additional Information" and to serve an "Illustrative Rate Summary Form" is extended from June 21 to July 8. The "Illustrative Rate Summary Form" and related rate design and bill impacts require additional work and internal analysis that was not assumed to be required when the IOUs prepared their rate design proposals, and were not expressly required in the March 19 ALJ Ruling requesting rate design proposals. In addition, as the ALJ Ruling noted, the use of the bill calculators is a "complex and time consuming endeavor." Given the time frame and other deliverables in the proceeding, the IOUs believe a two week extension of time is reasonable for providing this supplemental information. In the meantime, the IOUs will be providing presentations on their rate design proposals at the June 25 CPUC workshop, and are responding to data requests by other parties. We do not propose any change to the June 21 deadline for service of parties' "Proposal Summary Forms."

By this email, PG&E, SCE and SDG&E are asking the other parties to the proceeding to respond by noon tomorrow pursuant to Rule 11.6 and agree to the request for an extension of the June 21 deadline in the ALJ's June 13 Ruling, and will report parties' comments as part of our formal request for an extension of the June 21 date that will

follow.

Thanks everyone for your consideration of our additional extension request.

Chris Warner
Counsel for PG&E
On behalf of PG&E, SCE and SDG&E

From: Ron Liebert [mailto:rl@eslawfirm.com]

Sent: Friday, June 14, 2013 1:47 PM

To: McKinney,

Jeanne; ATrowbridge@DayCarterMurphy.com; BCragg@GoodinMacbride.com; Bob.Dodds@liberty-energy.com; Bustamante, Claudia; Warner, Christopher (Law); CManzuk@SempraUtilities.com; CentralFiles@SempraUtilities.com; Diane.Fellman@nrgenergy.com; RegRelCPUCcases; Haertle, Steve; SRahon@SempraUtilities.com; TBrill@semprautilities.com; TLindl@kfwlaw.com; VidhyaPrabhakar O'Donnell, Arthur J.; aschwartz@solarcity.com; Tran, Ava N.; b.bordiine@d-e-c-a.org; barbara@barkovichandyap.com; bill@jbsenergy.com; Benjamin, Robert; Cherry, Brian K.; blaising@braunlegal.com; brian.theaker@nrgenergy.com; bruce.reed@sce.com; Khoury, Dexter; carlierfrancois@yahoo.fr; case.admin@sce.com; cathie.allen@pacificorp.com; cathy.zhang@sourvillarreal.com; Christopher; Danforth, Christopher; dan.delurey@drsgcoalition.org; danielle@ceert.org; david@ceert.org; dchia@solarcity.com; Singh, Devla; Willis, Dan; dwooley@kfwlaw.com; dwtcpucdockets@dwt.com; ed@temix.com; ek@aklaw.com; enriqueg@greenlining.org; eric.wright@bves.com; erin@falquier.com; Torres, Elise; filings@aklaw.com; fwahl@svlg.org; gayatri@jbsenergy.com; Petlin, Gabriel; Heiden, Gregory; hayley@turn.org; Fortune, Hazlyn; holly@SunrunHome.com; jack.clark@energycenter.org; jarmstrong@goodinmacbride.com; jeann.Rahman@fscgroup.com; joshbode@fscgroup.com; joyw@mid.org; jweil@aglet.org; kdw@woodruff-expert-services.com; kerry.hattevik@nee.com; kfox@kfwlaw.com; kkiener@solarelectricpower.org; kmills@cfb.watts-zagha.com; Karen Camille; lencanty@BlackEconomicCouncil.org; liddell@energyattorney.com; lindaf@mid.org; Lynn Haug; lwisland@ucsusa.org; Tan, Lee-Whei; Weidemann, Mareijke; marcel@turn.org; markw@corchurch.org; matt.vespa@sierraclub.org; matthew@turn.org; mdjo:kito.com; Michele; mrw@mrwassoc.com; mtierney-lloyd@enernoc.com; nbrockway@aol.com; nes@aklaw.com; nguyen.quan@gswater.com; nicole@braunlegal.com; njohnson@consumercal.org; patrick.saxi@turn.org; Samson, Renee; rick@votesolar.org; Levin, Robert; Mutialu, Rajan; robertgnaizda@gmail.com; rsalter@edf.org; russell.garwacki@sce.com; sachu.constantine@energycenter.org; Murtishaw, Scott; siobhan.foley@energycenter.org; spauker@wsgr.com; ssmyers@att.net; St. Marie, Stephen; sswaroop@marinenergy.com; stephaniec@greenlining.org; stephengeorge@fscgroup.com; Stephen Gibbs, Syreeta; tculley@kfwlaw.com; terry.clapham@energycenter.org; timothy.treadwell@energycenter.org; Sullivan, Timothy J.; Horner, Trina; tomb@crossborderenergy.com; Kao, Valerie; Lee, Rebecca Tsai-Wei; wwright@sunrunhome.com; Tarasova, Catherine; Zafar, Marzia; Zhang, Zhen

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

Ronald Liebert
Ellison, Schneider & Harris L.L.P.
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816
(916) 447-2166
<mailto:rl@eslawfirm.com>
www.eslawfirm.com

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