

From: Warner, Christopher (Law

Sent: 6/19/2013 2:12:35 PM

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Cc:

Bcc:

Subject: RE: R.12-06-013: Request for Extension of Time to file IOU Supplemental Information Pursuant to June 13, 2013 ALJ Ruling

Dear Judge McKinney:

As indicated in our earlier email below, PG&E, SCE and SDG&E respectfully request 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" be extended from June 21 to July 8. The "Illustrative Rate Summary Form" requires additional work and internal analysis that was not assumed to be required when the IOUs prepared their rate design proposals, and was 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 an 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 the separate email below, PG&E, SCE and SDG&E asked other parties to the proceeding to agree to the request for an extension of the June 21 deadline in the ALJ's June 13 Ruling, and received the following comments from parties: Parties did not oppose the extension request, but TURN, joined by CCSE, Solar City, SunRun, EDF and CFC, stated that it would be unreasonable for parties to have only 4 days to comment on the IOUs' filings, pursuant to the recommended July 12 date for opening comments. Accordingly, TURN recommended that the IOUs' extension be shortened to July 2 instead of July 8, in order to allow parties a full 10 days to comment on the IOUs' supplemental information.

The IOUs have no objection to providing parties with 10 days to comment on the supplemental filings as requested by TURN et al, but we do need until July 8 to complete the bill calculator analyses required by the ALJ Ruling, particularly in light of the intervening July 4 holiday period. Accordingly, the IOUs recommend that parties who need a full 10 days to review and comment on the supplemental information be provided until July 18 to supplement their opening comments in order to do so. In addition, the IOUs continue to respond to data requests from parties on their rate design proposals, including from TURN.

Thank you for your consideration of our extension request.

Chris Warner

Counsel for PG&E

On behalf of PG&E, SCE and SDG&E

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From: Warner, Christopher (Law)

Sent: Tuesday, June 18, 2013 2:26 PM

To: 'Ron Liebert'; McKinney, Jeanne; ATrowbridge@DayCarterMurphy.com; BCragg@GoodinMacbride.com; Bob.Dodds@liberty-energy.com; Bustamante, Claudia; CManzuk@SempraUtilities.com; CentralFiles@SempraUtilities.com; Diane.Fellman@nrgenergy.com; ESchroeder@kfwlaw.com; Ekelly@MarinEnergy.com; Eric@CoalitionofEnergyUsers.org; Fadia.Khoury@sce.com; Faith.MabuhayAlliance@gmail.com; JCorralejo@LBCgla.org; JWaen@MarinEnergy.com; JYork@SempraUtilities.com; Joelle.Steward@PacifiCorp.com; Lynn.Marshall@Energy.Ca.Gov; Nick.Pappas@asm.ca.gov; Rachel@consciousventuresgroup.com; RegRelCPUCcases; Haertle, Steve; SRahon@SempraUtilities.com; TBrill@semprautilities.com; TLindl@kfwlaw.com; VidhyaPrabhakaran@dwt.com; wwright@sunrunhome.com; ahmad.faruqui@brattle.com; akbar.jazayeri@sce.com; akp.ServiceList@gmail.com; alewis@naacoalition.org; allenmcw@comcast.net; andykatz@sonic.net; O'Donnell, Arthur J.; aschwartz@solarcity.com; Tran, Ava N.; b.bordiine@d-e-c-a.org; barbara@barkovichandyp.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@soundofhope.org; cbarry@iwpnews.com; cem@newsdata.com; cfang@semprautilities.com; charlie.buck@energycenter.org; chris_king@siemens.com; cpuc@libertyutilities.com; Villarreal, Christopher; Danforth, Christopher; dan.delurey@drsgcoalition.org; danielle@ceert.org; david@ceert.org; dchia@solarcity.com; dhilla@consumercal.org; dmarcus2@sbcglobal.net; douglass@energyattorney.com; Singh, Devla; Willis, Dan; dwooley@kfwlaw.com; dwtcpucdockets@dwt.com; ed@temix.com; ek@a-klaw.com; enriqueg@greenlining.org; eric.wright@bves.com; erin@falquier.com; Torres, Elise; filings@a-klaw.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; jeannetteo@moval.org; jfine@edf.org; jim@jimlazar.com; jimin@mid.org; jkeyes@kfwlaw.com; jleslie@McKennaLong.com; jmauldin@adamsbroadwell.com; Rahman, Junaid; 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@cfbf.com; Watts-Zagha, Karen Camille; lencanty@BlackEconomicCouncil.org; liddell@energyattorney.com; lindaf@mid.org; Lynn Haug; lwisland@ucsusa.org; Tan, Lee-Whei; Weidemann, Mareijke;

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

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

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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.

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