

From: Warner, Christopher (Law

Sent: 6/18/2013 2:25:53 PM

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Cc:

Bcc:

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.

Ron Liebert

Attorney for Vote Solar

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