

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Integrate
and Refine Procurement Policies and
Consider Long-Term Procurement Plans.

Rulemaking 12-03-014
(Filed March 22, 2012)

**WELLHEAD ELECTRIC COMPANY, INC.
COMMENTS ON TRACK 4 SCHEDULE**

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September 10, 2013

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In accordance with Administrative Law Judge (“ALJ”) David M. Gamson’s direction for party comments addressing the Track 4 Schedule at the September 4, 2013 Prehearing Conference, Wellhead Electric Company, Inc. (“Wellhead”) hereby respectfully submits the following comments.

Wellhead strongly endorses the ALJ’s proposed Track 4 Schedule that would proceed with the submission and consideration of testimony with the objective of being able to issue a Proposed Decision in December 2013.¹ Wellhead supports the ALJ’s proposal with regard to Track 4 scheduling because:

- 1) It properly recognizes the urgency of action to address the need to account for and replace the loss of the SONGs resource (made more acute by the probability of retirement of once-through cooling resources in the intermediate period);
- 2) It facilitates the incorporation of such an interim procurement authorization need into imminent Track 1 RFOs;

¹ Wellhead recognizes that the event of evidentiary hearings, if held, might delay this target into very early 2014.

- 3) It puts into the proceeding record testimony on the seven items identified by the ALJ at the PHC. This will provide the Commission with information to make decisions clearly relevant to the types of projects and/or operational attributes that meet any one or more of the various resource attributes implicated and lost by virtue of the loss of SONGs as well as the retirement of OTC plants; and
- 4) It accounts for the chance that adjustments and/or changes to the Track 1 RFO efforts, as modified by the interim Track 4 decision, may be appropriate based on information in the testimony (from the CAISO and any responses) on transmission issues/alternatives based on the CAISO's Transmission Planning Process.

Regarding the Track 2 Schedule, Wellhead appreciates the interest by some parties in delaying the testimony and other related activities. However, it seems inappropriate for there to be a delay in the filing of testimony and the conduct of hearings that should be very informative as to project attributes essential to the continued expansion of the renewable resource portfolio.

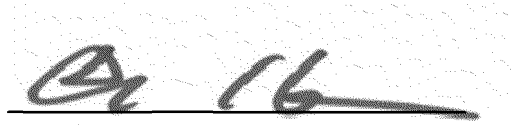
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Wellhead looks forward to, and is prepared to submit testimony on, the ALJ's proposed Track 4 Schedule.

Dated: September 10, 2013

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. K. Kerner", is written over a horizontal line. The signature is somewhat stylized and includes a large flourish at the end.

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