

**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.
REPLY COMMENTS ON TRACK 4 SCHEDULE**

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September 13, 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 reply comments.

For reasons stated in its Opening 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. To no surprise, this proposal is not universally supported and many comments propose delay. As stated, Wellhead disagrees with that recommendation.

In addition, many comments advance the idea that if a delay is not approved, proceeding should be conditioned, whether explicitly or in generalized manner, on resource procurement authorization of a predetermined and presumptively preferred resource type, whether that be renewable for example, or conventional. Wellhead also disagrees with that notion; an interim authorization as the utilities universally request and the ALJ proposes should follow the record. Accordingly, also as pointed out in its Opening Comments, Wellhead encourages proceeding with the ALJ’s proposed schedule that will produce record testimony on the seven items identified by the ALJ at the PHC.

Wellhead appreciates the opportunity to provide these reply comments.

Dated: September 13, 2013

Respectfully submitted,

A handwritten signature in black ink, appearing to read "DKK", is positioned above a horizontal line. The signature is somewhat stylized and partially obscured by a light, dotted background.

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