

**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.

R.12-03-014  
(Filed March 22, 2012)

**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)  
ON PROPOSED SCHEDULE CHANGES**

CHARLES R. MIDDLEKAUFF  
MARK R. HUFFMAN

Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105  
Telephone: (415) 973-3842  
Facsimile: (415) 973-0516  
E-Mail: MRH2@pge.com

Dated: September 13, 2013

Attorneys for  
PACIFIC GAS AND ELECTRIC COMPANY

**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.

R.12-03-014  
(Filed March 22, 2012)

**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)  
ON PROPOSED SCHEDULE CHANGES**

Pursuant to the schedule established by the assigned Administrative Law Judge (ALJ) at the September 4, 2013, pre-hearing conference, Pacific Gas and Electric Company (PG&E) provides these reply comments on the potential schedule modifications that have been proposed for Tracks 2 and 4 of the 2012 Long-Term Procurement Plan (LTPP) proceeding.

**The Schedule Modifications Proposed By The Assigned ALJ, Which Keep Tracks 2  
And 4 “On Track,” Should Be Adopted**

PG&E continues to support the schedule modifications proposed by the ALJ during the pre-hearing conference. (Tr. pp. 292 and following.) Under the ALJ’s proposal, Track 2 and Track 4 remain on their current schedules. (Tr. p. 294 (Track 2); Tr. pp. 292-93 (Track 4).) The ALJ’s proposal contemplates a potential second decision on Track 4, either in the 2012 LTPP or in a future proceeding, based on the information provided to the California Public Utilities Commission (Commission) regarding the outcome of the California Independent System Operator’s (CAISO) transmission planning process (TPP). (Tr. p. 293-94.)

Parties arguing for significant delay (*e.g.*, California Environmental Justice Alliance, Sierra Club California, and Protect Our Communities Foundation (CEJA/Sierra Club/POC) Comments on Schedule; The Center for Energy Efficiency and Renewable Technologies (CEERT) Comments on Schedule) suggest that if only the Commission waits, it will have “complete

information” (CEJA/Sierra Club/POC Comments on Schedule, pp. 4-6) or a “complete record” (CEERT Comments on Schedule, pp. 2, 4-6) to make its decision regarding procurement for local reliability needs in southern California.

Contrary to these parties’ suggestions, the Commission will never have complete information to make its decision. In particular, next year there will still be uncertainty surrounding the key transmission projects identified by Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E), even if these projects receive endorsement and CAISO Board approval in the CAISO’s current TPP. The decision to move forward with a significant transmission project is only the first step in a long process that retains substantial uncertainty over the ultimate timing and completion of the project.

Both SCE and SDG&E have urged the Commission to move forward with Track 4 due to concerns about “keeping the lights on” in southern California. (Tr. pp. 288-89 (SCE attorney); Tr. p. 289 (SDG&E attorney).) PG&E supports that approach.

Some parties have proposed a one week delay in the current schedule for submitting Track 4 testimony (from September 23 to September 30). (*See, e.g.*, SDG&E Comments on Schedule, p. 7.) PG&E does not object to a one week delay in the schedule for submitting testimony, so long as it does not require a significant delay in the currently scheduled hearing dates.

**The Assigned ALJ Should Not, At This Time, Adopt Substantive Limitations On The Commission’s Ability To Authorize Procurement**

PG&E opposes the proposal by several parties that the ALJ adopt, now, substantive limitations on what the Commission might authorize in a decision on Track 4. Specifically, several parties propose that the ALJ rule now, before receiving all the testimony, that any Track 4 authorization issued consistent with the current schedule must be limited to preferred resources. (*See, e.g.*, The Natural Resources Defense Council, the California Energy Efficiency Industry Council, Vote Solar Initiative, and Clean Coalition (NRDC/CEEIC/VSI/Clean Coalition) Comments on Schedule.) The ALJ should reject these proposals and should not, at

