

**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)

**MOTION OF THE PROTECT OUR COMMUNITIES FOUNDATION TO EXTEND THE  
DEADLINE FOR SUBMITTING TRACK 4 REBUTTAL TESTIMONY**

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October 10, 2013

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Pursuant to Rule 11.1 of the Commission’s Rules of Practice and Procedure, the Protect Our Communities Foundation (“POC”) respectfully moves for a six business-day extension of the deadline for submitting its Track 4 Rebuttal Testimony in the instant proceeding, R.12-03-014.

The Protect our Communities Foundation is currently actively involved in two related proceedings, the instant LTPP Track-4 proceeding, and A.13-06-015 (regarding SDG&E’s application to enter into a Power Purchase Agreement with Pio Pico, LLC). As a result of this active involvement, POC currently faces a significant scheduling conflict. Track 4 Rebuttal Testimony is currently due on October 14, 2013. This deadline conflicts with the A.13-06-015 evidentiary hearings, which are scheduled for October 14-15, 2013. Unless POC is granted an extension of time to submit its rebuttal testimony in the instant proceeding, POC’s ability to

develop meaningful Rebuttal Testimony in the instant proceeding will be significantly prejudiced.

POC is facing this scheduling conflict as a result of the unusual, highly compressed schedules adopted by the Commission in both A.13-06-015 and Track 4 of the instant proceeding. The schedule for A.13-06-015 is as follows:<sup>1</sup>

Intervenor testimony served	Friday, September 20, 2013
Rebuttal testimony served	Friday, October 4, 2013
Evidentiary hearing	9:00 a.m. Monday, October 14, 2013 and Tuesday, October 15, 2013 Commission Courtroom State Office Building 505 Van Ness Avenue San Francisco, CA 94012
Concurrent opening briefs filed	To be determined
Concurrent reply briefs filed [submission]	To be determined
Proposed decision	[no later than 90 days after submission]
Commission decision	[no later than 90 days after proposed decision]

As a small, public interest intervenor facing a significant scheduling conflict as a result of the unusually compressed schedules adopted by the Commission in two related proceedings, POC will be significantly prejudiced if it is not granted an extension of time to submit its Track 4 Rebuttal Testimony.

<sup>1</sup> A.13-06-015, Assigned Counsel's Proposed Opening Memo and Ruling, Available At: <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M075/K766/75766844.PDF>

POC requests an extension of the deadline to submit its Track 4 rebuttal testimony of no less than six business days. This extension is the minimum amount of time needed by POC to complete its Rebuttal Testimony after the conclusion of the A.13-06-015 evidentiary hearings on October 15, 2013.

Respectfully Submitted,

Dated: October 10, 2013

/S/  
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Foundation