

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

Order Instituting Rulemaking on the
Commission's Own Motion to Conduct a
Comprehensive Examination of Investor
Owned Electric Utilities' Residential Rate
Structures, the Transition to Time Varying and
Dynamic Rates, and Other Statutory
Obligations.

Rulemaking 12-06-013
(Filed June 21, 2012)

**COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E) ON PROPOSED PROCEDURAL SCHEDULE AND
NEED FOR EVIDENTIARY HEARINGS FOR PHASE 2
INTERIM RATE CHANGE APPLICATIONS**

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Dated: November 8, 2013

Attorneys for
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Pursuant to the October 25, 2013, Assigned Commissioner's Ruling Inviting Utilities to Submit Interim Rate Change Applications (ACR), Pacific Gas and Electric Company (PG&E) provides its comments on the proposed procedural schedule and whether evidentiary hearings are necessary for Phase 2 of this proceeding. PG&E generally supports the procedural schedule proposed by the ACR for the new interim rate relief referred to as "Phase 2" of the OIR for initial rate relief by summer 2014. Rate relief is critically necessary by summer 2014 in order to avoid severe bill increases to over a million PG&E residential customers under the current inequitable rate design structure.

PG&E also believes that evidentiary hearings may be unnecessary for the reasons set forth below. PG&E also recommends that the Commission promptly establish an appropriate venue and procedural schedule for consideration of additional rate relief proposals under AB 327 that can be put into effect by early 2015.

Evidentiary hearings may be unnecessary for Phase 2, given the extensive record already developed in Phase 1 on the rate design proposals filed by the utilities and other parties. To the extent that the rate design proposals presented in Phase 2 will provide more detailed information on the specific rates and bill impacts that would result, PG&E recommends that the CPUC provide for expedited discovery and informal workshops to facilitate addressing any relevant factual issues. In lieu of evidentiary hearings, the CPUC's schedule could instead provide either for formal briefs or comments to address factual, legal and policy issues. Also consistent with the ACR's request that the parties work among themselves to see if agreement can be reached, PG&E intends to engage interested parties in informal discussions on its rate design application soon after it is filed, and is hopeful that continued discussions throughout Phase 2 could result in stipulations or settlements on issues in the proceeding.

PG&E appreciates the support of the Commission and its staff to consider proposals for the rate relief PG&E customers need for summer 2014 and beyond as authorized to be considered by the Commission under AB 327.

Respectfully Submitted,

CHRISTOPHER J. WARNER
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By: _____ /s/
CHRISTOPHER J. WARNER

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