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Sent: 11/1/2013 11:07:31 AM
To: 'gxh@cpuc.ca.gov' (gxh@cpuc.ca.gov)
Cc: [Redacted]
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Bcc:
Subject: Revised Joint Motion to Withdraw for your team to review

Greg

Thanks for your team's quick review and edits yesterday afternoon to the first draft Joint Motion to Withdraw default PTR.

Attached is a redline that builds off your version and is acceptable to PG&E.

- [Redacted] In the first attachment, all changes are shown in revision format for clarity.
- [Redacted] The second attachment is the same thing presented as a clean copy with all changes accepted, for ease of reading.

We hope our suggested refinements provide a reasonable compromise that ORA can live with.

Our suggested changes primarily focus on:

- (1) Conforming all text to "withdrawal" (there had still been some references to "dismissing" since you used our first document as your basis),
- (2) Adding an early footnote with CPUC decision citation that support withdrawal at this point in a proceeding, and,
- (3) Compromising between your desire to delete some of the factual info and make it overall a more neutral tone, with our belief that certain facts need to be before the CPUC for them to have adequate basis to grant the withdrawal. As a middle ground, we have suggested:
 - a. adding back a listing of page number cites for the Staff Report without separately listing what's on those pages.

b. We also feel strongly that since the motion states there is no record supporting an opt-in PTR proposal here, there has to be at least a brief mention that PG&E already has an opt-in CPP rate in place. This revision tries to do that in a neutral way by simply referencing other officially noticeable documents.

(We feel it is important that the CPUC know that whereas SCE and SDG&E had no opt-in res peak pricing program and thus had to be ordered to implement something that is “opt-in” by May 2014 to take the place of default PTR, if the CPUC here grants withdrawal, PG&E will still have an opt-in peak pricing program in place for summer 2014, as SmartRate will continue whether or not the CPUC adopts this withdrawal of default PTR. We don’t want the CPUC to get hung up on thinking that approval of this withdrawal might leave PG&E without something for Summer 2014. We are concerned that, without a minor reference to this difference, the processing of this Motion might otherwise get delayed. Nothing being said here would preclude the CPUC taking a another look at opt-in peak pricing approaches for SCE, SDG&E or PG&E after the OIR decision comes out, either -- and your draft wisely notes the OIR outcome is sensible to wait for as a prerequisite. In the meantime, under the status quo all three utilities’ customers will have an option for Summer 2014 even with this withdrawal approval.)

Thanks in advance to your and your team once again promptly reviewing these suggested edits. It would be great to hear back from you this afternoon if possible.

I am hopeful that we are closing in on being able to file something soon, probably on Monday -- though possibly COB today if we are lucky.

Best regards,

Gail Slocum

415 515 2892 cell