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Bcc:

Subject: R12 03 014 (LTPP) PG&E and SDG&E Motions to Strike

Your Honor:

MEA requests summary denial of the SDG&E and PG&E Motions to Strike Portions of MEA's Brief.

SDG&E

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In the case of SDG&E, their requests are overly broad. Such remarkable requests include striking:

- All of MEA's summary of recommendations
- All of the introduction
- All of the legal background to CAM and its applicability (which directly impacts the cost treatment of SONGS)

- All of the legal description of CAM and how CAM **by law** applies both generally and in the case of CCAs.

- In essence, the entirety of MEA’s brief, other than a few small sections which would not give the full perspective on CAM.

As set forth in MEA’s brief, MEA believes that SDG&E and SCE have not made the appropriate showings for CAM under the law, and as such MEA’s brief is relevant in its entirety. For these reasons, it would be appropriate for the Commission to summarily deny SDG&E’s motion.

PG&E

Similarly, PG&E has requested that sections of MEA’s brief which are both founded in the facts in the proceeding and in law also be denied. Most of PG&E’s deletions are reflected in the record in: MEA’s Integrated Resource Plan, Exhibit MEAxSDG&E-1, the Hearing Transcript, and others.

Timing

PG&E and SDG&E have requested response times by December 12. This is not a reasonable period of time for response based upon their filings and the other filings MEA has in the interim. MEA, with a regulatory staff of 2.5 people, is currently working on 26 active proceedings at the CPUC, as well as proceedings at CARB, the CEC and CAISO. While MEA was able to accommodate SCE’s request, MEA respectfully requests the full 15 days to respond to SDG&E and PG&E.

Thank you for your consideration of these requests,

Beth

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