

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

Order Instituting Rulemaking on the Commission's
Own Motion to Conduct a Hearing on
Examination of In-State Owned Electric Utilities'
Retail Rate Structure and Transmission and
Distribution and Dynamic Rates and Other Statutory
Obligations

Rulemaking,) - 6- -
(Filed June,))

**PROTEST OF
THE CALIFORNIA SOLAR ENERGY INDUSTRIES ASSOCIATION
AND EFFICIENCY FIRST CALIFORNIA**

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Docket No. - 10 -

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 Investment (Own-
Electric Utilities' Residential Rate Structure)
Transitions to Transitioning and Dynamic
Rates and Other Regulatory Obligations

Rulemaking,)-6- -
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I. Introduction

On June 8, 2014, the California Public Utilities Commission issued an Order Instituting Rulemaking on the Commission's Own Motion to Conduct a Comprehensive Examination of Investment (Own-Electric Utilities' Residential Rate Structure) Transitions to Transitioning and Dynamic Rates and Other Regulatory Obligations. On October 7, 2014, Governor Brown signed AB 777. Among other things, this legislation would establish under AB 777, the new statute would require the Commission to issue a new Assigned Commission's Ruling on the Phase II of this (ultra) Commission is issued on the original questions that would be classified as Phase I. The October 5 ACR in the state in the Commission's (IOUs) the filing applications for interconnection (at change) stating "The present future (at check, and Time) (at change should begin in) 4." The IOUs each filed applications on 6/10/14).

The California Solar Energy Industries Association (CALSEIA) and Efficiency First California protest the Commission's decision to issue a comprehensive examination of investment (Own-Electric Utilities' Residential Rate Structure) Phase II of this proceeding and would impact the regulatory proceeding to the state's energy system and would increase the costs of energy efficiency and energy.

Paid increases to Title and Title at a excess

The ACR states: "The aid (at the check and in compliance with statute, and Title) (at the should not increase by an excess amount." It also states that "Rate of sign change" 4 should be.

Pacific Gas & Electric (PG&E) proposed (at the increase of .8 ¢/kWh for Title, and 4.9 ¢/kWh for Title). Southern California Edison (SCE) proposed increase of . ¢/kWh for Title, and 4.5 ¢/kWh for Title). San Diego Gas & Electric (SDG&E) proposed an increase of ¢/kWh for Title. The proposed increase of a excess (adding the, - the) - the for Title, and) 8% the -) the for Title).

Particularly excess SDG&E's proposed (a two-title) (at the (uctu) CALSEIA and Efficiency First California do not support a collapsing of (at the is at this time

If this is the first step toward a continuing phase in a flat rate structure the and point of the phase suggests by the intent and proposals is a wholesale rate of (the & the (at the (uctu) If the sale and steps contained in the intent and proposals would the of the (the applied the the (at the is in a line) fashion the (uctu) would quickly change the decreasing check pricing. Decreasing checks would result in the and the step of equal rate change the SCE (at the two & the steps the SDG&E (at the and the & the steps for PG&E (at the. As a result a Commission decision in Phase of this proceeding in fact the decreasing check pricing intent and (at the change should be new when as fact in that direction as the change proposed by the IOUs.

CALSEIA and Efficiency First California reject the the & the (the judge & the of Phase of this proceeding. The Commission should reject any application that is not & the.

1) ACR p. 5.
2) ACR p. 4.
3) PG&E Supplemental Filing of Pacific Gas and Electric Company (U-9 E) filed Su &) 4 Rebuttal Electric Rate and November 22, 2013
4) SCE Phase Two Supplemental Filing of Southern California Edison Company (U-8-E) filed Int & Rebuttal Rate of Sign Change November 22, 2013
5) SDG&E Supplemental Filing of San Diego Gas & Electric Company (U9 M) filed Phase Int & Rate Change November 22, 2013.

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R'sp'etfully su'itt'd this D%'&') -) - at Sac(a&'at#Calif#(nia.

/s/ B'nad'it'D' Chia
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⁹ Pu'lic R'#u(c% C#d'%) 578'add'd'y SB , #f) #6.