From: Slocum, Gail (Law Sent: 2/13/2014 1:24:53 PM

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Subject: A draft for your consideration, let's talk ASAP

## Greg

Hi! Hope all's well. I just tried calling you (left a detailed voicemail). I hope to speak with you soon about a proposed Joint Motion to Reconsider the recent PTR Ruling, which I'm told Mike Campbell was going to discuss with you, too.

To get the ball rolling, I have gone ahead and attached a draft for ORA's consideration and comments. I would happy to discuss with you over the phone why we have taken this approach. And we will, of course, welcome your suggested wordsmithing along the lines of our successful collaborative drafting process last Fall on the Motion to Withdraw. We are hoping to hear back with your initial edits by COB tomorrow, if possible. Obviously, time is of the essence to get this filed, as the Ruling's deadline for testimony in the re-opened proceeding is be April 1, 2014, and we need to get a stay of that right away. We would like to file by Wednesday of next week.

- •□□□□□□□□ Given the wording and tone of that surprising Ruling, we felt this Motion needed to include a beefed up discussion of the "new developments" since the PTR proceeding was submitted. There are new developments even within the last week on the RROIR that are mentioned here, and should help.
- □ □ □ □ □ □ □ We feel it is especially important to include in this new Joint Motion something like the text in section II.C, explaining more clearly that ORA's position on PTR has changed. Without meaning to be presumptuous, I went ahead and took a shot at a first draft of that section, based on what I thought I had heard from ORA in the more recent past. But feel free to rewrite as you and your team deem appropriate. Just thought it could save time to have a draft as a starting point for edits.

I have a settlement conference in the GRC Phase II proceeding this afternoon from 3-4:30, but should otherwise be available to talk today, and will welcome your call.

Thanks,

## **Gail Slocum**

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