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Bcc:

Subject: R.13-09-011-Demand Response-Sierra Club et al motion for extension of time for testimony, & for DRAM workshops

Dear Judge Hymes,

Pursuant to Rule 11.6 of the Commission's Rules of Practice and on behalf of parties to R. 13-09-011 Sierra Club, TURN, Natural Resources Defense Council, Environmental Defense Fund, and Clean Coalition, we respectfully request that:

- the time to file prepared testimony be extended by 3 weeks, from May 6 to May 27 for opening testimony, and from May 20 to June 10, 2014 for rebuttal testimony;
- one or more workshops be scheduled to encourage collaborative discussions on DRAM before parties file testimony on that topic; and
- the remainder of the proposed schedule for evidentiary hearings, if needed, and for opening and reply briefs be extended accordingly.

This motion is based on discussions and broad consensus among many of the parties, including those listed above and others, that the schedule proposed in the April 2 Revised Scoping Memo does not provide adequate time for parties to thoughtfully address a wide range of complex topics, and that not all parties have the resources or in-house expertise to meet the deadlines proposed in the April 2 Ruling.

We also believe that some of these topics (including, but perhaps not limited to the Demand Response Auction Mechanism, or DRAM) can benefit significantly from collaborative discussions to inform stakeholders and narrow any contested issues for subsequent testimony. This is especially true for DRAM, since many of the parties to this proceeding were not involved in the several years of development of the renewable auction mechanism (RAM) proposed as a starting point for DRAM; have not participated in RAM auctions; and could gain important perspectives from other entities experienced with RAM, before considering adoption of RAM-like protocols or standard contracts in the demand response context.

We appreciate the importance of moving this docket along as quickly as possible to provide the utilities and the CAISO with the tools they need to address important changes in California's energy markets. We believe that these requests will help achieve that, while providing a more robust record for Commission action. To help expedite this process, we invite others on the service list to respond via email with their support or objections to these requests by the close of business tomorrow, Friday, April 11.

Respectfully submitted,

John Nimmons
Counsel for the Sierra Club

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