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Cc:

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Subject: R.11-05-005 (RPS): AReM Request for Extension of Time to Submit RPS  
Procurement Plans

Dear Administrative Law Judge DeAngelis,

Pursuant to Rule 11.6 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, the Alliance for Retail Energy Markets ("AReM") hereby requests a three week extension of time in the schedule for this proceeding for the submission of RPS Procurement Plans. AReM's requested extension and revised schedule is outlined below:

Date	Item
6/25/14	IOUs, Small Utilities, and ESPs file proposed annual RPS Procurement Plans
7/15/14	PacifiCorp files supplement to 2014 IRP – comments and reply comments may be filed within 15 and 20 days, respectively.
7/23/14	Comments filed on RPS Plans, Supplement, and Issues and Questions in this Ruling
8/20/14	Motions requesting evidentiary hearing (note: If a motion is filed and granted, the ALJ may need to issue a revised schedule.)
8/20/14	Reply comments on RPS Plans, IRPs and Ruling Issues/Questions
9/10/14	Motion to update RPS Plans
4 <sup>th</sup> Quarter 2014	Projected date for issuance of Proposed Decision
4 <sup>th</sup> Quarter 2014	Projected date for Commission vote on Proposed Decision
4 <sup>th</sup> Quarter 2014	IOUs issue Request for Offers for Solicitations or otherwise pursue approved RPS Procurement Plan

AReM requests this extension to the RPS Procurement Plan schedule to provide sufficient time to develop and incorporate Renewable Net Short ("RNS") calculations and address questions as required by the May 21, 2014 Administrative Law Judge's Ruling on Renewable Net Short ("RNS Ruling"). Prior to the RNS Ruling, the March 26, 2014 Assigned Commissioner's Ruling Identifying Issues and Schedule for Review for 2014 Renewables Portfolio Standard Procurement Plans ("Assigned Commissioner's Ruling") specified that Electric Service Providers ("ESPs") and other retail sellers were not required to provide quantitative information, including "quantitative data, methodologies, and calculations relied upon to assess the retail seller's RPS portfolio needs and *RPS procurement net short*." (Assigned Commissioner's Ruling, p. 12, emphasis added.) Commission Staff also instructed AReM that quantitative information and RNS calculations were not required in the RPS Procurement Plans of ESPs. After the RNS Ruling was issued, AReM sought clarity about the applicability of the RNS Ruling. AReM learned from Staff on the evening of May 22, 2014 that the RNS Ruling applied to all retail sellers, including ESPs. Given this late notification that RPS Procurement Plans would now need to include this previously unrequired quantitative information, AReM's requested extension is appropriate, particularly as the Memorial Day holiday fell between the RNS Ruling and the current June 4, 2014 deadline for RPS Procurement Plans.

Additionally, the standardized RNS reporting template required by the RNS Ruling is currently unavailable on the Commission's website and has not been provided in a format which may be populated to all retail sellers required to comply with the RNS Ruling. This further supports AReM's requested extension.

AReM's requested extension should not negatively impact other parties to the proceeding. In accordance with Rule 11.6, AReM emailed the service list on May 27, 2014 to determine whether any party objected to this extension request. AReM's requested extension is supported by Bear Valley Electric Service, Calpine PowerAmerica, Commerce Energy Inc., Constellation NewEnergy Inc., Direct Energy Services LLC, Jan Reid, Liberty Power Holdings LLC, Noble Americas Energy Solutions LLC, and the Retail Energy Supply Association. Additionally, the California Wind Energy Association and PacifiCorp do not object to the requested extension.

For the reasons above, AReM's requested extension should be granted.

Respectfully submitted,

Jedediah J. Gibson

Attorney for the Alliance for Retail Energy Markets

Cc: Service List for R.11-05-005 (distributed over 6 emails to avoid rejection by CPUC and other email servers.)

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