BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans

Rulemaking 12-03-014 (Filed March 22, 2012)

JOINT MOTION TO SHORTEN TIME FOR RESPONSES TO THE JOINT PETITION FOR MODIFICATION OF DECISION 14-03-004 SEEKING NOTICE AND COMMENT OF SDG&E's PROPOSED PROCUREMENT PLANS

DEBORAH BEHLES DAVID ZIZMOR Environmental Law & Justice Clinic Golden Gate University School of Law 536 Mission Street San Francisco, CA 94105 Telephone: (415) 369-5336 Facsimile: (415) 896-2450 dbehles@ggu.edu, dzizmor@ggu.edu

Attorneys for CALIFORNIA ENVIRONMENTAL JUSTICE ALLIANCE

JIM BAAK Program Director, Grid Integration Vote Solar 101 Montgomery St., Suite 2600 Telephone: (415) 817-5064 jbaak@votesolar.org WILLIAM ROSTOV TAMARA ZAKIM Earthjustice 50 California Street, Suite 500 San Francisco, CA 94111 Telephone: (415) 217-2000 wrostov@earthjustice.org tzakim@earthjustice.org

MATTHEW VESPA Senior Attorney Sierra Club 85 Second Street, 2nd Floor San Francisco, CA 94105 Telephone: (415) 977-5753 matt.vespa@sierraclub.org

Attorneys for SIERRA CLUB CALIFORNIA

Dated June 12, 2014

JOINT MOTION TO SHORTEN TIME FOR RESPONSES TO THE JOINT PETITION FOR MODIFICATION OF DECISION 14-03-004 SEEKING NOTICE AND COMMENT OF SDG&E's PROPOSED PROCUREMENT PLANS

Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure, Sierra Club, California Environmental Justice Alliance ("CEJA") and Vote Solar ("Joint Parties") respectfully move to shorten the time for responding to the concurrently filed Joint Petition for Modification of Decision 14-03-004 Seeking Notice and Comment of SDG&E's Proposed Procurement Plans ("Petition"). The Joint Parties seek to shorten the time to respond to their Petition to June 23rd in order to ensure San Diego Gas & Electric's ("SDG&E") procurement plans comply with the requirements of D.14-03-004, to provide transparency in procurement approval, and to restore public confidence in the Commission's approval process.

Resolution of the Petition is time-sensitive. As indicated in the Petition, SDG&E's procurement plans are inconsistent with the requirements set forth in D.14-03-004. To correct this, the Petition requests that the Commission modify D.14-03-004 to allow for formal notice and comments related to SDG&E's proposed procurement plans. Since the proposed modification is a straightforward change to procedure, Energy Division is already evaluating SDG&E's procurement plans, and the Joint Parties seek to minimize any delay in the review and approval of the procurement plans by Energy Division, the Joint Parties respectfully ask the Commission to grant this motion and shorten the time to respond to the Petition to June 23, 2014. No party will be disadvantaged by this shortening of time, and the Commission's decisionmaking will benefit from the ability to consider the petition and responses on an expedited basis.

//

//

//

Dated: June 12, 2014

Respectfully submitted,

/s/

Matthew Vespa Senior Attorney Sierra Club 85 Second St., 2nd Floor San Francisco, CA 94105 (415) 977-5753 <u>matt.vespa@sierraclub.org</u> Attorney for Sierra Club

Deborah Behles Environmental Law and Justice Clinic Golden Gate University School of Law 536 Mission Street San Francisco, CA 94105 (415) 369-5336 <u>dbehles@ggu.edu</u> Attorney for California Environmental Justice Alliance

Jim Baak Program Director, Grid Integration Vote Solar 101 Montgomery Stre et, Suite 2600 San Francisco, CA 94 104 (415) 817-5064 jbaak@votesolar.org