

**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 June 3, 2014)

**MOTION TO SHORTEN TIME FOR RESPONSES TO  
PETITION FOR EXPEDITED MODIFICATION OF  
DECISION 13-02-015**

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June 3, 2014

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Pursuant to Rule 11.1 of the Commission’s Rules of Practice and Procedure, Terra-Gen Power, LLC (“Terra-Gen”) respectfully moves to shorten the time for responding to Terra-Gen’s *Petition for Expedited Modification of Decision 13-02-015* (“Petition”), submitted concurrently with this motion. Terra-Gen seeks an accelerated response to its Petition to ensure that the ongoing competitive solicitation initiated by Southern California Edison Company (“SCE”) pursuant Decision (“D.”) 13-02-015 is fair, transparent, and consistent with the Commission’s directives in that decision.

Time is of the essence for deciding Terra-Gen’s Petition. As indicated in the Petition, the language of D. 13-02-015 appears to be susceptible to misinterpretation, and SCE appears to have misinterpreted this decision to create a new eligibility requirement for continuing participation in the competitive solicitation process. The deadline for completion of negotiations in the competitive solicitation process is June 24, and the commercial lockdown is June 9.

Without expedited action by the Commission, projects that were wrongly excluded from the competitive solicitation process may no longer be available at a later time.

For these reasons, Terra-Gen respectfully asks the Commission to grant its motion and to shorten the time to respond to Terra-Gen's Petition to June 10, 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.

Respectfully submitted June 3, 2014.

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