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Subject: Informal Comments on SDG&E's Proposed Any Resource Procurement Plan Under Decision 14-03-004 (LTPP Track 4)

Parties to R.12-03-014:

As a courtesy, attached please find informal comments sent to Energy Division today by Sierra Club, California Environmental Justice Alliance, Vote Solar, the Natural Resources Defense Council, and the Environmental Defense Fund on SDG&E's proposed any resource procurement plan. (SDG&E's proposed plans, submitted to Energy Division pursuant to D.14-03-004, were provided to Sierra Club by Energy Division following a Public Records Act and related requests. The plans given to Sierra Club are not confidential.)

As set forth more fully in the attached letter, the proposed plan does not comply with the requirements of Decision 14-03-004. With regard to the 300-600 MW of authorized "any resource" procurement, D.14-03-004 requires that: 1) SDG&E "shall issue an all-source Request for Offers for some or all capacity"; 2) the procurement be "consistent to extent feasible with the Loading Order"; and 3) total procurement can be lowered toward minimum levels in the event of approval of transmission projects that reduce local capacity needs. By seeking approval for the immediate bilateral procurement of the 600 MW Carslbad gas facility, the proposed plan plainly fails to meet these requirements. Under the proposed any resource plan, SDG&E will not issue an all-source RFO to meet *any* of its any resource authorization and will not comply with the Loading Order. The procurement plan also ignores the recent approval of three highly viable transmission projects that collectively reduce local capacity needs in the San Onofre area by 800 – 1680 MW.

The proposed procurement plan violates D.14-03-004 and cannot be approved as proposed. We ask that Energy Division require SDG&E to submit a revised any resource plan that contains an all-source solicitation process, complies with the Loading Order, and accounts for the significant reductions in local area need that will result from recently approved transmission projects.

Thank you,  
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