### BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Implementation and Administration of California Renewables Portfolio Standard Program.

Rulemaking 11-05-005 (Filed May 5, 2011)

## MOTION TO (1) AMEND THE CONFIDENTIAL VERSION OF PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) JUNE 4, 2014 DRAFT RENEWABLE ENERGY PROCUREMENT PLAN AND (2) WAIVE EXTENSION OF TIME FOR COMMENTS UNDER RULE 1.12 (PUBLIC VERSION)

CHARLES M. MIDDLEKAUFF M. GRADY MATHAI-JACKSON

Pacific Gas and Electric Company P.O. Box 7442 San Francisco, CA 94120 Telephone: (415) 973-3744

Facsimile: (415) 973-5520 E-mail: mgml@pge.com

Attorneys for PACIFIC GAS AND ELECTRIC COMPANY

Dated: June 23, 2014

# BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Implementation and Administration of California Renewables Portfolio Standard Program.

Rulemaking 11-05-005 (Filed May 5, 2011)

## MOTION TO (1) AMEND THE CONFIDENTIAL VERSION OF PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) JUNE 4, 2014 DRAFT RENEWABLE ENERGY PROCUREMENT PLAN AND (2) WAIVE EXTENSION OF TIME FOR COMMENTS UNDER RULE 1.12 (PUBLIC VERSION)

Pursuant to the California Public Utilities Commission's Rule of Practice and Procedure ("Rule") 1.12, Pacific Gas and Electric Company ("PG&E") hereby moves to amend the confidential version of its June 4, 2014 Draft Renewable Energy Procurement Plan (the "Draft 2014 RPS Plan"), filed under seal on June 4, 2014. PG&E inadvertently omitted the confidential version of Appendix C1, entitled "Net Short Calculation Using PG&E Bundled Retail Sales Forecast in Near Term (2014 - 2018) and LTPP Methodology (2019 - 2033)," from the original confidential filing.

Because the omission does not change or impact the public version of PG&E's Draft 2014 RPS Plan, PG&E is attaching the confidential version of Appendix C1 only to the confidential version of this filing.

PG&E is concurrently serving a complete electronic version of the amended confidential version of its Draft 2014 RPS Plan on those parties that had previously requested it and to the presiding Commissioner's office. PG&E is also serving a hard copy of the confidential version of Appendix C1 on the presiding Administrative Law Judges.

Rule 1.12(b) provides that "[t]he time for filing a reply, response, protest, or answer to an amended document is calculated from the date the amendment is filed." Because PG&E's amendment impacts only one page of the confidential version of its 2014 Draft RPS Plan and because a very limited number of parties received the confidential version of that Plan, PG&E moves to waive any modification to the schedule for the 2014 RPS Plan proceeding set forth in the Assigned Commissioner's Ruling Identifying Issues and Schedule of Review for 2014 Renewables Portfolio Standard Procurement Plans, issued in this docket on March 26, 2014 (the "ACR"), as modified. [1]

Respectfully submitted,

CHARLES R. MIDDLEKAUFF M. GRADY MATHAI-JACKSON

By: /s/M. Grady Mathai-Jackson
M. GRADY MATHAI-JACKSON

Pacific Gas and Electric Company P.O. Box 7442 San Francisco, CA 94120 Telephone: (415) 973-3744

Facsimile: (415) 973-5520 E-mail: mgml@pge.com

Attorneys for PACIFIC GAS AND ELECTRIC COMPANY

Dated: June 23, 2014

In an e-mail dated April 16, 2014 to the service list for this proceeding, ALJ DeAngelis granted a joint IOU request for an extension of three weeks to the schedule set forth in the ACR.

Accordingly, opening comments on the Draft 2014 RPS Plan are due to be filed not later than July 2, 2014.

#### **VERIFICATION**

I am an employee of PACIFIC GAS AND ELECTRIC COMPANY, a corporation, and am authorized to make this verification on its behalf. I have read the foregoing "MOTION TO (1) AMEND THE CONFIDENTIAL VERSION OF PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) JUNE 4, 2014 DRAFT RENEWABLE ENERGY PROCUREMENT PLAN AND (2) WAIVE EXTENSION OF TIME FOR COMMENTS UNDER RULE 1.12 (PUBLIC VERSION)" dated June 23, 2014. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23rd day of June 2014 at San Francisco, California.

/s/ Karen Khamou

Karen Khamou Manager, Renewable Energy Policy and Planning Pacific Gas and Electric Company