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

Application of Pacific Gas and Electric Company for
Authority, Among Other Things, to Increase Rates and
Charges for Electric and Gas Service Effective on
January 1, 2020.

(U 39 M)

Application No. 18-12-009
(Filed: December 13, 2018)

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39M) TO SHORTEN
TIME FOR RESPONSES TO THIS MOTION AND TO THE MOTION TO STRIKE
TESTIMONY OF ALLIANCE FOR NUCLEAR RESPONSIBILITY**

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I. INTRODUCTION AND SUMMARY

In accordance with Rules 1.12 and 11.1 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”), Pacific Gas and Electric Company (“PG&E”) requests an order shortening time to respond to current motion and to PG&E’s concurrently-filed *Motion To Strike The July 26, 2019 Prepared Testimony Of The Alliance For Nuclear Responsibility* (“Motion to Strike”) so that responses are due to each motion, respectively, by July 31 and August 5, 2019 rather than 15 days from the date of filing as allowed by the Commission’s Rules of Practice and Procedure (“Rules”) Rule 11.1(e).

**II. GOOD CAUSE EXISTS TO SHORTEN TIME ON THIS MOTION FOR
SHORTENED TIME**

Good cause exists for approval of this Motion. As indicated in PG&E’s motion, the Alliance for Nuclear Responsibility (“A4NR”) submitted testimony which essentially requests the Commission to make a need determination for the Diablo Canyon Power Plant (“Diablo Canyon”) in this proceeding. PG&E requests shortened time to respond to this motion as PG&E has a limited time to prepare rebuttal testimony to respond to these issues, which PG&E reasonably understood were not in the scope of this proceeding and thus were not addressed in PG&E’s opening testimony.

In this case, if the time is not shortened, responses to this Motion and the concurrently-filed Motion would be due on August 13. According to the schedule, rebuttal testimony is due September 5. Thus PG&E and other parties interested in this issue would benefit from a quick resolution of the Motion since a significant amount of work could be avoided in this issue is deemed out of scope of this proceeding. Of course, the Administrative Law Judges are not required to wait for responses to PG&E's motion to rule on it.^{1/} Given the current schedule, it would benefit all parties if the Administrative Law Judge would issue a ruling on the Motion earlier than the Commission's rules may indicate. The shortened time should not be burdensome to the parties as it would provide a week to respond to PG&E's Motion to Strike.

PG&E suggest the following schedule be adopted:

Response to this Motion	July 31, 2019
Response to the Motion to Strike	August 5, 2019

III. CONCLUSION

For all the foregoing reasons the Commission should grant PG&E's Motion for shortened time to respond to this Motion, and to the Motion to Strike Testimony.

^{1/} Rule 11.1 (g).

Respectfully submitted:

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