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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 Services Effective  
on January 1, 2020

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

(U 39 M)

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY  
(U 39M) TO SHORTEN TIME FOR RESPONSES TO THIS  
MOTION AND TO THE MOTION OF PACIFIC GAS AND  
ELECTRIC COMPANY TO STRIKE REVISED  
TESTIMONY OF THE UTILITY REFORM NETWORK**

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Dated: October 7, 2019

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OF THE STATE OF CALIFORNIA**

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**I. INTRODUCTION**

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 the current Motion to Shorten Time for Responses, and to PG&E’s concurrently-filed Motion of Pacific Gas and Electric Company To Strike The Revised Testimony Of The Utility Reform Network (“Motion to Strike”), so that responses are due to the Motion to Shorten Time for Responses by Tuesday October 8, 2019 and that responses are due to the Motion to Strike by Wednesday October 10, 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 FOR RESPONSES TO THIS  
MOTION FOR SHORTENED TIME AND TO PG&E’S MOTION TO STRIKE  
REVISED TESTIMONY**

As indicated in PG&E’s Motion to Strike, the “Revised Prepared Testimony Of Jennifer Dowdell Addressing Issues Of Accountability And Pacific Gas and Electric’s Showing As Required By The 2017 General Rate Case Deferred Work Settlement” (Revised Testimony) was served October 4, 2019 by The Utility Reform Network (TURN) on all the parties in this proceeding. The Revised Testimony purports to address PG&E’s 2019 work plan for cross bore

inspections that PG&E presented in its gas distribution rebuttal testimony.

Good cause exists for approval of this Motion to Shorten Time because if the Commission denies PG&E's Motion to Strike, and allows TURN's Revised Testimony to stand, PG&E needs a reasonable opportunity to respond to the Revised Testimony, including the option of submitting sur-rebuttal testimony and preparing cross examination for TURN's witness. Without a quick resolution of this issue, PG&E will be deprived of the opportunity to respond to the new issues raised in TURN's Revised Testimony.

Hearings in this proceeding are already well underway and scheduled to end on October 18. Moreover, TURN's witness Jennifer Dowdell is scheduled to appear for cross examination on Monday October 14. If the time to respond to these motions is not shortened as requested by PG&E, responses to this Motion and the concurrently-filed Motion to Strike would be due on October 22, i.e., four days after the conclusion of hearings.

As provided by Rule 11.1 (g), the Administrative Law Judges are not required to wait for responses to PG&E's Motion to Strike in order to rule on it. Given the current hearing and cross examination schedule, it would be beneficial if the Administrative Law Judges would issue a ruling on the Motion to Strike earlier than the Commission's rules may indicate. PG&E suggests the following schedule be adopted:

Response to this Motion	October 8, 2019
Response to the Motion to Strike	October 9, 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 Revised Testimony.

Respectfully Submitted,

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