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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, 2017.
(U39M)

Application No. 15-09-001
(Filed September 1, 2015)

**JOINT MOTION OF
OFFICE OF RATEPAYER ADVOCATES,
THE UTILITY REFORM NETWORK,
ALLIANCE FOR NUCLEAR RESPONSIBILITY,
CENTER FOR ACCESSIBLE TECHNOLOGY,
COALITION OF CALIFORNIA UTILITY EMPLOYEES,
COLLABORATIVE APPROACHES TO UTILITY SAFETY ENFORCEMENT,
CONSUMER FEDERATION OF CALIFORNIA,
ENVIRONMENTAL DEFENSE FUND,
MARIN CLEAN ENERGY,
MERCED IRRIGATION DISTRICT,
MODESTO IRRIGATION DISTRICT,
NATIONAL DIVERSITY COALITION,
SMALL BUSINESS UTILITY ADVOCATES,
SOUTH SAN JOAQUIN IRRIGATION DISTRICT, AND
PACIFIC GAS AND ELECTRIC COMPANY
TO SHORTEN TIME FOR COMMENTS AND REPLIES TO
THE MOTION FOR ADOPTION OF SETTLEMENT AGREEMENT**

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Dated: August 3, 2016

Attorneys for
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Pursuant to Rule 11.1(e) of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), the Office of Ratepayer Advocates (ORA), The Utility Reform Network (TURN), Alliance for Nuclear Responsibility (A4NR), Center for Accessible Technology (CforAT), Collaborative Approaches to Utility Safety Enforcement (CAUSE), Coalition of California Utility Employees (CUE), Consumer Federation of California (CFC), Environmental Defense Fund (EDF), Marin Clean Energy (MCE), Merced Irrigation District (Merced ID), Modesto Irrigation District (Modesto ID), National Diversity Coalition (NDC), Small Business Utility Advocates (SBUA), South San Joaquin Irrigation District (SSJID) and Pacific Gas and Electric Company (PG&E) (Moving Parties) hereby jointly move to

shorten the time for responses and replies to Moving Parties' Motion for Adoption of Settlement Agreement (Motion for Settlement), which is being filed concurrently with this motion.

The Moving Parties request that the time for comments to the Settlement Agreement be shortened to 15 calendar days from the 30 days provided for in Rule 12.2. The Moving Parties also request that the time for replies be shortened to 7 calendar days from the 15 days provided for in Rule 12.2. Thus, Moving Parties request that comments be due on August 18, 2016 and replies be due on August 25, 2016.

A shortened period is justified for three reasons.

First, no party should be surprised by the content of the Settlement Agreement or the Motion for Settlement. All parties providing testimony in this proceeding have joined the settlement and are Moving Parties. Furthermore, all of the then-current parties to the proceeding -- whether or not the party submitted testimony -- have been invited to the settlement discussions starting in early June 2016.

Second, the Settlement Agreement resolves all issues in the proceeding, except two for which the Settlement Agreement presents contested provisions.^{1/} These two issues are: (i) whether or not to authorize a third post-test year revenue requirement and (ii) whether PG&E should be authorized a new balancing account for new requirements concerning gas leaks arising from Commission Rulemaking (R.) 15-01-008. Given the limited number of issues being contested, the shortened periods should not unreasonably inconvenience any party.

Third, a shortened period would allow for workshops or hearings on the Settlement Agreement to be held during the week of August 29, 2016. This would allow the Commission and the parties to take advantage of the already-scheduled hearing room dates. This would, in turn, help to expedite the issuance of a final decision in this matter.

Wherefore, for the reasons stated above, Moving Parties request a ruling shortening time for parties to comment and reply to the Motion for Settlement.

1/ See Section VI.C of the Motion for Settlement.

Pursuant to Rule 11.1(g), Moving Parties respectfully request an expedited ruling on this motion.

Pursuant to Rule 1.8(d), counsel or representatives for the Moving Parties have authorized PG&E to execute this document on their behalf.

Respectfully Submitted,

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MICHAEL KLOTZ

By: /s/ Steven W. Frank
STEVEN W. FRANK

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