

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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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)

A.15-09-001
(Filed September 1, 2015)

**MOTION
OF THE OFFICE OF RATEPAYER ADVOCATES
FOR AN EXTENSION OF TIME TO PROVIDE POSITION SUMMARY
FOR THE JOINT COMPARISON EXHIBIT**

I. INTRODUCTION

Pursuant to Rule 11.6 of the California Public Utilities Commission's (CPUC or Commission) Rules of Practice and Procedure, the Office of Ratepayer Advocates (ORA) submits this Motion for an Extension of Time to Provide its Position Summary for the draft Joint Comparison Exhibit. Specifically, ORA asks for an extension of time until May 6, 2016 to submit to Pacific Gas and Electric Company (PG&E) its Position Summary. It is ORA's understanding that neither PG&E nor The Utility Reform Network (TURN) oppose ORA's request. ORA sent an email to the other parties on Friday, April 8, 2016, notifying them that ORA would be requesting an extension. As of this writing, ORA is aware of no opposition to its request.

II. DISCUSSION

On March 24, 2016, the Administrative Law Judge issued a Ruling ordering parties submitting testimony in this case to provide their own "party-specific contributions to a draft Joint Comparison Exhibit" in accordance with instructions and templates attached to the Ruling.¹ Attachment 1 to the Ruling says that ORA is to provide its position summaries to PG&E by April 15, 2016.

¹ ALJ Ruling (3/24/16), p. 4.

By this Motion, ORA asks for an extension of time until May 6, 2016 to provide its position summary to PG&E. On April 7, 2016, counsel for ORA, PG&E and TURN had a conference call to discuss, among other things, preparation of the Joint Comparison Exhibit. During the call, PG&E stated that it could support an extension of time for ORA until May 6. Even with the extension, PG&E anticipates being able to produce the draft Joint Comparison Exhibit prior to evidentiary hearings. With the caveat that ORA's positions -- and those of other parties -- on specific issues may change as the case proceeds, ORA is hopeful that the additional time for the submission of ORA's entries to the draft Joint Comparison Exhibit will increase their accuracy.

III. CONCLUSION

For all the foregoing reasons, ORA asks that it be allowed an extension of time to May 6, 2016 to provide PG&E the ORA-specific position summaries and forecasts.

Respectfully submitted,

/s/ LAURA TUDISCO

Laura Tudisco

Attorney for the Office of Ratepayer Advocates

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2164
Email: ljt@cpuc.ca.gov

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