

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



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In the Matter of the Application of San Diego Gas &
Electric Company (U 902 E) for Authorization to Recover
Unforeseen Liability Insurance Premium and Deductible
Expense Increase as a Z-Factor Event

A.09-08-019
(Filed August 31, 2009)

**PROTESTOR HENRICKS' MOTION TO FILE REPLY TO SAN DIEGO GAS &
ELECTRICT RESPONSE TO RUTH HENRICKS REQUEST FOR INTERVENOR
COMPENSATION RELATED TO DECISION 10-12-053**

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April 15, 2011

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

In the Matter of the Application of San Diego Gas &
Electric Company (U 902 E) for Authorization to Recover
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**I.
INTRODUCTION**

Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure, Protestor Ruth Henricks files this motion seeking permission from Administrative Law Judge Maribeth Bushey to file "Protestor Henricks' Motion to File Reply to San Diego Gas & Electric's Response to Ruth Henricks request for intervenor compensation related to Decision 10-12-053."

Protestor Henricks filed a "Request for Intervenor Compensation Related to D10-12-053" on March 21, 2011. SDG&E filed "Response to Ruth Henricks request for intervenor compensation related to Decision 10-12-053." Meanwhile, days before on March 18, 2011, the Utility Consumers Action Network filed its "Response to Ruth Henricks request for intervenor compensation related to Decision 10-12-053."

In total the Responses, one filed by a large utility and the other filed by a non-profit organization engaged in Public Utilities Commission proceeding for more than 15 years, contained more than 65 pages of briefs which required analysis and response.

Protestor Henricks is a first-time intervenor and the time frame required to research, analyze, and brief both Commission precedent, Superior Court precedent and Court of Appeal precedent required more than the 15 days permitted by Rule 17.4(h) of the Commission Rules of

Practice and Procedure. Neither party will be prejudiced by the granting of permission to file as the decision in this proceeding has been rendered.

For these reasons, Protestor Henricks respectfully requests that Administrative Law Judge Maribeth Bushey accept “Protestor Henricks’ Motion to File Reply to San Diego Gas & Electric’s Response to Ruth Henricks request for intervenor compensation related to Decision 10-12-053” and allow Protestor Henricks to file “Reply to San Diego Gas & Electric’s Response to Ruth Henricks request for intervenor compensation related to Decision 10-12-053.”

Respectfully Submitted,

/s/ Michael J. Aguirre

Michael J. Aguirre
Maria C. Severson

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PROTESTOR HENRICKS

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **PROTESTOR HENRICKS' MOTION TO FILE REPLY TO SAN DIEGO GAS & ELECTRICT RESPONSE TO RUTH HENRICKS REQUEST FOR INTERVENOR COMPENSATION RELATED TO DECISION 10-12-053** by electronic mail to each party listed in the attached CPUC Service List for Proceeding A0908019.

Dated this 15th day of April, 2011, at San Diego, California.

/s/ Maria E. Byrnes

Maria E. Byrnes

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

PROCEEDING: A0908019 - SDG&E - TO RECOVER U
FILER: SAN DIEGO GAS & ELECTRIC COMPANY
LIST NAME: LIST
LAST CHANGED: FEBRUARY 8, 2011

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