

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

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Second Application of Pacific Gas and Electric Company for Approval of Agreements Resulting from Its 2014-2015 Energy Storage Solicitation and Related Cost Recovery (U39E).

Application 16-04-024
(Filed April 29, 2016)

**MOTION FOR LEAVE TO FILE
REPLY BRIEF OF THE OFFICE OF RATEPAYER ADVOCATES
[CONFIDENTIAL VERSION] UNDER SEAL; [PROPOSED] ORDER**

Pursuant to Rule 11.4 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, the Office of Ratepayer Advocates ("ORA") hereby submits this *Motion for Leave to File Reply Brief of the Office of Ratepayer Advocates [Confidential Version] Under Seal*, in the above-referenced docket.

ORA is filing its reply brief on October 7, 2016. ORA's reply brief references confidential information, which contain details related to Pacific Gas and Electric Company's ("PG&E") 2014-2015 Energy Storage Solicitation. PG&E designated the information as market-sensitive data. Thus, ORA respectfully requests that the Commission grant this motion to protect ORA's Opening Brief as confidential and file under seal.

Respectfully submitted,

/s/ LISA-MARIE CLARK

Lisa-Marie Clark

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October 6, 2016

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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[PROPOSED] ORDER

Having reviewed the Motion of the Office of Ratepayer Advocates (“ORA”) for
an order to file the confidential version of: **REPLY BRIEF THE OFFICE OF
RATEPAYER ADVOCATES [CONFIDENTIAL VERSION]** filed on September 23,
2016 and for good cause appearing,

IT IS HEREBY ORDERED that the confidential version may be filed under
seal.

Dated: _____ at San Francisco, California.

By: _____
Administrative Law Judge