

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



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Application of Pacific Gas and Electric
Company for Approval of the Retirement of
Diablo Canyon Power Plant,
Implementation of the Joint Proposal, And
Recovery of Associated Costs Through
Proposed Ratemaking Mechanisms
(U 39 E)

A1608006

Application 16-08-006
(Filed August 11, 2016)

**MOTION TO SUPPLEMENT, FOR PURPOSES OF FILING EXHIBITS,
ENVIRONMENTAL PROGRESS'S MOTION TO SUSPEND CONSIDERATION OF PACIFIC
GAS AND ELECTRIC COMPANY'S APPLICATION FOR APPROVAL OF THE RETIREMENT OF
DIABLO CANYON POWER PLANT, IMPLEMENTATION OF THE JOINT PROPOSAL, AND
RECOVERY OF ASSOCIATED COSTS THROUGH PROPOSED RATEMAKING MECHANISMS**

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ENVIRONMENTAL PROGRESS

Filed and served September 27, 2016.

MOTION TO SUPPLEMENT

Through this document and by their attorneys, Progressive Law Group LLC, Environmental Progress ("EP") moves to supplement its MOTION TO SUSPEND CONSIDERATION OF PACIFIC GAS AND ELECTRIC COMPANY'S APPLICATION FOR APPROVAL OF THE RETIREMENT OF DIABLO CANYON POWER PLANT, IMPLEMENTATION OF THE JOINT PROPOSAL, AND RECOVERY OF ASSOCIATED COSTS THROUGH PROPOSED RATEMAKING MECHANISMS to include additional Exhibits not able to be filed with the Motion because the CPUC's electronic filing site precludes filing of sets of documents that together exceed 20 MB.

In support of this Motion, Environmental Progress ("EP") states and shows as follows:

1. On September 23, 2016 counsel for EP received electronic correspondence from the Docket Office of the California Public Utilities Commission indicating that an already-submitted Motion of the same name, and its supporting Exhibits, denominated as "Amended" was being rejected from filing, and including instructions.
2. On September 26, 2016 counsel for EP attempted to resubmit the filing in a complaint format and with the directed name change. The Exhibits document associated with the Motion had to be broken into multiple sub-segments in order to process it as a PDF/A document. Here is why. On

information obtained from CPUC staff, and pursuant to experience, the CPUC e-filing system will not permit the filing of PDF/A formatted documents converted to that format on a Macintosh operating system using Adobe Acrobat Pro DC software.

3. The free conversion option referenced by CPUC staff will not convert documents greater than 5 MB.
4. Creating multiple PDF/A documents resulted in a cumulative increase in the combined size of the documents such that the associated attempted filing exceeded the CPUC's e-filing system's 20 MB limit.
5. To enable the filing of the Motion, it was submitted with only the first five component segments of the PDF/A Exhibits document.
6. Once the Motion and the first five component segments of the PDF/A Exhibits document were submitted, the "resubmission" protocol in the refiling instructions form CPUC staff would not work for the reason indicated immediately below.
7. The CPUC's e-filing system does not reference an option for filing Exhibits or components of a combined Exhibits document independent of a Motion.

8. Counsel for EP sought further guidance from CPUC staff, resulting in the suggestion on September 27, 2016 that “a supplemental motion requesting leave to include additional exhibits” could be filed.
9. This is that Motion.

Respectfully submitted September 27, 2016

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