

**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  
Adoption of Its Smart Grid Deployment Plans.

Application 11-06-006  
(Filed June 6, 2011)

And Related Matters.

Application 11-06-029  
Application 11-07-001

**REPLY OF VERIZON CALIFORNIA INC. (U 1002 C) TO CALIFORNIANS FOR  
RENEWABLE ENERGY, INC.'S RESPONSE TO  
VERIZON'S MOTION FOR PARTY STATUS**

Pursuant to Rule 11.1(f) of the Commission's Rules of Practice and Procedure, and with the permission of Administrative Law Judge Timothy J. Sullivan granted by e-mail on May 18, 2012, Verizon California Inc. (Verizon) files this reply to the May 16, 2012 response of the Californians for Renewable Energy, Inc. (CARE) opposing Verizon's motion for party status.

The Commission should disregard the unfounded and off-point assertions contained in CARE's response — which have no bearing to the matter at hand, i.e., Verizon's request to participate in this proceeding as a party. Entities seeking party status under Rule 1.4(b) are required to:

- (1) fully disclose the persons or entities in whose behalf the filing, appearance or motion is made, and the interest of such persons or entities in the proceeding; and

(2) state the factual and legal contentions that the person intends to make and show that the contentions will be reasonably pertinent to the issues already presented.

Verizon's motion satisfies these criteria; accordingly, it should be granted. As Verizon explained, Verizon is a third-party provider of home energy management solutions and seeks to aid the Commission in the establishment of policies that will promote ongoing investment and innovation in the smart grid-enabled market. Indeed, as a third party already serving consumers in this market, Verizon has a direct and valuable perspective to offer the Commission in its examination of the issues in this proceeding, which include "whether and how the deployment plans promote customer empowerment and engagement" and "whether the deployment plans provide the information needed to promote advanced market responses."<sup>1</sup>

Accordingly, the Commission should disregard CARE's opposition and grant Verizon party status in this proceeding.

Dated: May 21, 2012

Respectfully submitted,

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<sup>1</sup> See, e.g., Administrative Law Judge Ruling Setting Schedule And Topics For Workshops (Nov. 22, 2011) at 2.