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

Application of Pacific Gas and Electric
Company (U-39 E) for Approval and Recovery
of Oakland Clean Energy Initiative Preferred
Portfolio Procurement Costs

Application 20-04-013

U 39 E

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E) TO SUSPEND COMMENT PERIOD ON THE
JANUARY 8, 2021 PROPOSED DECISION**

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Attorneys for
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Dated: January 15, 2021

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Pursuant to Rule 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) files this motion requesting the Commission to suspend the comment period on the January 8, 2021 Proposed Decision of ALJ Fogel (PD).

PG&E is making this request to ensure that the Commission has the most current information regarding the local area reliability service (LARS) agreements with Dynegy Marketing and Trade LLC (Vistra) and Tierra Robles Energy Storage, LLC (esVolta) as it evaluates PG&E's application.

At this time, PG&E is in discussions with Vistra to move out the date by which Vistra commits to begin meeting its reliability commitments to PG&E, and PG&E is in discussions with esVolta to move out the date by which esVolta commits to begin meeting its reliability commitments to PG&E. PG&E did not anticipate any discussions to modify the LARS agreements when PG&E submitted its opening and reply briefs in this proceeding.

This new information, which has not been previously provided in the proceeding, is inconsistent with the PD, which relies on the fact that, as late as the filing of its opening and reply brief, PG&E raised no concerns regarding the feasibility and reasonableness of the Vistra and esVolta project schedules that PG&E has presented to the Commission during the course of the proceeding. (PD, p. 84.)

The driver of the discussions to modify the Vistra and esVolta LARS agreements is the

information coming out of the respective interconnection processes associated with each of the two projects. For each project, the interconnection timeline associated with the project will require moving its online date out several months.

PG&E will work to resolve this uncertainty as quickly as possible, and commits to provide an update to the Commission, either in a formal filing or by whatever means the Commission or assigned administrative law judge (ALJ) might direct.

In the interim, PG&E respectfully moves that the Commission suspend the comment period on the PD, or take whatever action the Commission or the assigned ALJ determines to be appropriate in light of the current expectation that the Vistra and esVolta LARS agreements will be modified to move out, by several months, the dates by which Vistra and esVolta commit to begin meeting their respective reliability commitments to PG&E.

Respectfully Submitted,

PACIFIC GAS AND ELECTRIC COMPANY

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