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May 3, 2021

VIA ELECTRONIC MAIL

Rachel Peterson
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Request for Extension of Time for all Load Serving Entities to Comply with the April- May Commitment Deadline in Ordering Paragraph 28 of Decision 20-06-002

Dear Ms. Peterson:

Pursuant to Rule 16.6 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) acting in its role as the Central Procurement Entity respectfully requests an extension of time to June 2021 for all load serving entities (LSEs) to comply with Ordering Paragraph (OP) 28 of Decision 20-06-002 (Central Procurement Entity (CPE) Decision).¹ The CPE Decision adopted implementation details for central procurement of multi-year local resource adequacy (RA) to begin for the 2023 compliance year in the PG&E and Southern California Edison Company ("SCE") distribution service areas.

OP 28 of the Decision adopts the RA timeline outlined in Section 3.10 of the Decision, which includes a "deadline (April – May)" for "LSEs in SCE and PG&E TAC areas [to] commit to CPE to show self-procured local resources in RA filing for 2023

¹ PG&E is submitting this Rule 16.6 request on behalf of PG&E as the CPE only. Pursuant to the competitive neutrality rule adopted for PG&E in Decision 20-12-006, PG&E as the CPE has not coordinated with PG&E the bundled service utility's portfolio management team that is responsible for participation in CPE solicitation activities on this request.

and 2024.”² Accordingly, LSEs must commit to the CPE to show their self-procured local resources by the April – May 2021 deadline.

On April 23, 2021, PG&E as the CPE issued its 2021 Central Procurement Entity Local Resource Adequacy Request for Offers (PG&E 2021 CPE Local RA RFO). In order to support compliance by all LSEs with OP 28, the PG&E 2021 CPE Local RA RFO solicitation protocol includes a schedule for LSEs to commit to PG&E as the CPE to show their self-procured local resources that aligns with the April – May 2021 deadline in the CPE Decision. According to the schedule in the PG&E 2021 CPE Local RA RFO solicitation protocol, the current deadline for all LSEs to commit to show their self-procured local resources for no compensation is May 17, 2021, which is 24 days from the issuance of the PG&E 2021 CPE Local RA RFO and initial publication of solicitation protocol documents. The current deadline for all LSEs to commit to show their self-procured local resources that are eligible for the Local Capacity Requirements Reduction Compensation Mechanism (LCR RCM) or indicate in their competitive offers that they commit to show their self-procured local resources for no compensation if they are not selected as part of the competitive solicitation process is May 28, 2021, which is 35 days from the issuance of the PG&E 2021 CPE Local RA RFO and initial publication of solicitation protocol documents.³

While such time periods for review and response are achievable, PG&E as the CPE would like to extend the aforementioned deadlines in the PG&E 2021 CPE Local RA RFO solicitation protocol in the interest of supporting a more thorough and complete review by LSEs of the relevant solicitation protocol documents.

To that end, PG&E as the CPE hereby requests an extension of time to June 2021 for all LSEs to comply with OP 28 of Decision 20-06-002. If such an extension is granted, PG&E as the CPE plans to modify and extend the schedule in the PG&E 2021 CPE Local RA RFO for LSEs to commit to PG&E as the CPE to show their self-procured local resources so that LSEs will have additional time to review and respond. PG&E as the CPE believes that this extension will ultimately result in a more successful PG&E 2021 CPE Local RA RFO. This brief extension will not cause any further changes to, or interfere with, PG&E as the CPE’s or LSEs’ ability to adhere to the remaining obligations outlined in, the timeline adopted in OP 28.

PG&E as the CPE appreciates your consideration of this matter and respectfully requests the Commission grant this extension as soon as reasonably possible.

² CPE Decision, OP 28, pp. 69-70.

³ PG&E’s deadline falls one day before on May 27, 2021, in compliance with OP 13 of the CPE Decision, which requires investor-owned utility offers to be submitted in advance of the receipt of offers from any other entities.

Rachel Peterson, Executive Director
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Sincerely,



Sidney Bob Dietz II
Director - Regulatory Relations

cc: aljextensionrequests@cpuc.ca.gov
Service lists R.17-09-020, R.19-11-009

CERTIFICATE OF SERVICE

I hereby certify that I have this day served true copy of **Request for Extension of Time for all Load Serving Entities to Comply with the April- May Commitment Deadline in Ordering Paragraph 28 of Decision 20-06-002** to all known parties listed on official service lists for Docket Nos. R.17-09-020 and R.19-11-009 (non-consolidated) by electronic mail (email) to all listed with valid email address. A copy was also served by email to: aljextensionrequests@cpuc.ca.gov.

Executed on May 3, 2021 at San Francisco, California.

/s/ Sally Cuaresma

SALLY CUARESMA