

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

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local and Flexible Procurement Obligations for the 2019 and 2020 Compliance Years.

R.17-09-020
(Filed September 28, 2018)

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
MOTION TO SHORTEN TIME TO RESPOND TO
MOTION FOR STAY OF DECISION 19-10-021**

Irene K. Moosen
Director, Regulatory Affairs
**CALIFORNIA COMMUNITY
CHOICE ASSOCIATION**
One Concord Center
2300 Clayton Road
Suite 1150
Concord, CA 94521
Email: Regulatory@cal-cca.org

Evelyn Kahl
Ann Springgate
Benjamin Ellis
Buchalter, A Professional Corporation
55 Second Street
Suite 1700
San Francisco, CA 94105
415.227.0900 office
ekahl@buchalter.com

Counsel to the
California Community Choice Association

October 24, 2019

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local and Flexible Procurement Obligations for the 2019 and 2020 Compliance Years.

R.17-09-020
(Filed September 28, 2018)

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
MOTION TO SHORTEN TIME TO RESPOND TO
MOTION FOR STAY OF DECISION 19-10-021**

Pursuant to Rule 11.1(e) of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, the California Community Choice Association (CalCCA)¹ respectfully submits this Motion to Shorten Time to Respond to CalCCA's Motion for Stay of Decision 19-10-021 (Motion for Stay), filed and served by CalCCA concurrently herewith. CalCCA requests that parties' responses be due within two (2) business days, or by October 28, 2019, to allow the Commission to issue a decision on CalCCA's Motion for Stay as soon as practicable.

CalCCA's Motion for Stay requests the Commission to immediately stay Decision 19-10-021 (Decision), addressing Resource Adequacy (RA) import rules, for purposes of the October 31 and November 17 compliance showings and any additional showings until the Commission issues a decision on the Application for Rehearing, which is filed and served concurrently with

¹ California Community Choice Association represents the interests of 19 community choice electricity providers in California: Apple Valley Choice Energy, CleanPowerSF, Clean Power Alliance, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, Marin Clean Energy, Monterey Bay Community Power, Peninsula Clean Energy, Pioneer Community Energy, Pico Rivera Innovative Municipal Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Jacinto Power, San Jose Clean Energy, Silicon Valley Clean Energy, Solana Energy Alliance, Sonoma Clean Power, and Valley Clean Energy.

this Motion. Good causes exist to shorten parties' time to respond to CalCCA's Motion for Stay.² Under Rule 11.1(e), parties have 15 days to respond to written motions "unless the Administrative Law Judge sets a different date." Given the negative impact of the Decision on most, if not all, parties involved, CalCCA does not anticipate any opposition to this Motion to Stay. If a party does decide to submit a response, a shortened two-day response period is non-prejudicial because CalCCA's Motion for Stay is short (less than nine pages) and presents a straightforward issue. Moreover, parties wishing to respond to the real issue at hand, the Application for Rehearing of D.19-10-021, will have ample time and opportunity to do so.

Most crucial, the October 31, 2019 compliance date is quickly approaching, and with it, the potential noncompliance penalties. Due to this potential harm, CalCCA respectfully requests the Commission expedite its consideration of CalCCA's Motion for Stay so that all potentially affected parties will not begin to incur penalties because of D.19-10-021.

October 24, 2019

Respectfully submitted,

Evelyn Kahl



Counsel to
the California Community Choice Association

² See Decision (D.)05-04-020, Sept. 7, 2005 (applying a "good cause" standard to a motion to shorten time for response).

PROPOSED ORDER

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

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local and Flexible Procurement Obligations for the 2019 and 2020 Compliance Years.

R.17-09-020
(Filed September 28, 2018)

ORDER GRANTING MOTION TO SHORTEN TIME

Pursuant to Rule 11.1 of the Commission Rules of Practice and Procedure, I hereby shorten response time to the *Motion for Stay of Decision 19-10-021* by two (2) business days, or by October 28, 2019.

This order is effective today.

Dated October , 2019, at San Francisco, California.

/s/

Administrative Law Judge