

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

Order Instituting Rulemaking Concerning
Energy Efficiency Rolling Portfolios,
Policies, Programs, Evaluation, and
Related Issues.

Rulemaking 13-11-005
(Filed November 14, 2013)

**MOTION FOR LEAVE TO FILE THE LOCAL GOVERNMENT
SUSTAINABLE ENERGY COALITION RESPONSE TO PARTIES'
REPLY COMMENTS REGARDING THE MAY 24, 2016
ADMINISTRATIVE LAW JUDGE RULING SEEKING INPUT ON
APPROACHES FOR STATEWIDE AND THIRD-PARTY
PROGRAMS**

Pursuant to Rules 1.7 and 11.1 of the Commission's Rules of Practice and Procedure, the Local Government Sustainable Energy Coalition (LGSEC) respectfully requests leave to file a Response to Parties' Reply Comments in order to address newly raised issues. Specifically, LGSEC's Response addresses Parties' Reply Comments regarding LGSEC's proposal submitted in Opening Comments that the Commission authorize: 1) a Statewide Energy Efficiency Local Government Program Area (LGPA); 2) that existing Local Government Partnerships (LGP) continue to be honored as currently authorized; 3) that the American Recovery and Reinvestment Act (ARRA) continuation and other ratepayer-funded energy efficiency programs would continue as would other current local government- implemented energy efficiency programs; and 4) that all would transition to a new statewide administrative platform. In addition, LGSEC requested that the Local Government Commission (LGC) be specifically designated and authorized to file a proposed Business Plan for Commission consideration detailing a

statewide LGPA implementation structure that would be overseen by the LGC. LGC would act as the single statewide lead program implementer under contract to a single statewide lead IOU program administrator, as the May 24, 2016 ALJ Ruling sets forth in its definition of “statewide.”

LGSEC requests leave to file a Response so that the Commission will have the benefit of a complete record concerning the new proposal which addresses individual concerns raised in Reply Comments in this proceeding. Several Parties’ Reply Comments raise important questions that deserve consideration. However, we disagree with several commenters’ conclusions that dismiss outright or otherwise misconstrue various aspects of the proposal. These commenters unfairly characterize potential risks that either cannot arise or can be easily addressed with appropriate guidance from the Commission. LGSEC specifically addresses these issues in the concurrently filed Response to Reply Comments.

For all the foregoing reasons, LGSEC urges the Commission to grant this Motion for Leave to File a Response to Reply Comments.

Respectfully submitted,



By: _____
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For the LOCAL GOVERNMENT
SUSTAINABLE ENERGY COALITION
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