

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

Order Instituting Rulemaking to Create a  
Consistent Regulatory Framework for the  
Guidance, Planning and Evaluation of Integrated  
Distributed Energy Resources.

Rulemaking 14-10-003  
(Filed October 2, 2014)

**RESPONSE OF THE INDEPENDENT ENERGY  
PRODUCERS ASSOCIATION TO THE JOINT MOTION  
REQUESTING EVIDENTIARY HEARINGS**

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The Independent Energy Producers Association (IEP) respectfully responds to the *Joint Motion of Southern California Edison Company, Pacific Gas and Electric Company, Southern California Gas Company and San Diego Gas & Electric Company Requesting Evidentiary Hearings*, filed on May 16, 2017. The Joint Motion asks the Commission to hold evidentiary hearings to resolve disputed issues of fact related to the Energy Division's proposed Societal Cost Test and Greenhouse Gas (GHG) Adder.

IEP agrees with the Joint Motion's request. The Societal Cost Test and GHG Adder will play an important role in the evaluation of a variety of technologies and resources, including the distributed energy resources that are the focus of this proceeding. The Commission's determination of the values for the Societal Cost Test and the GHG Adder should be grounded in a transparent process in which factual disputes can be exposed and tested through expert testimony, discovery, and cross-examination. IEP does not question Energy Division's good faith in developing its recommendations for the Societal Cost Test and GHG Adder, but it simply is not within the proper scope of Energy Division's delegated authority to adjudicate

disputed issues of material fact. The Joint Motion provides several examples of disputed facts that, depending on how the dispute is resolved, can have a significant bearing on the Societal Cost and the GHG Adder.

For these reasons, IEP respectfully urges the Commission to grant the Joint Motion and to expeditiously set a schedule for evidentiary hearings on the Societal Cost Test and GHG Adder proposals.

Respectfully submitted May 26, 2017 at San Francisco, California.

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By /s/ Brian T. Cragg

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