

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

Order Instituting Rulemaking to Promote)	
Consistency in Methodology and Input)	
Assumptions in Commission Applications)	R.04-04-025
of Short-Run and Long-Run Avoided Costs)	
Including Pricing for Qualifying Facilities)	
_____)	
)	
Order Instituting Rulemaking to Promote)	
Policy and Program Coordination and)	R.04-04-003
Integration in Electric Utility Resource)	
Planning)	
_____)	
)	

**OPPOSITION OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39E)
TO QF PARTIES' REQUEST FOR
AN ORDER SHORTENING TIME ON
THEIR MOTION FOR INTERLOCUTORY RELIEF**

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January 9, 2006

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

Order Instituting Rulemaking to Promote Consistency in Methodology and Input Assumptions in Commission Applications of Short-Run and Long-Run Avoided Costs Including Pricing for Qualifying Facilities)	
_____)	R.04-04-025
Order Instituting Rulemaking to Promote Policy and Program Coordination and Integration in Electric Utility Resource Planning)	
_____)	R.04-04-003

**OPPOSITION OF
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Pursuant to Rule 45 of the Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company ("PG&E") hereby submits the following opposition to the California Cogeneration Council, the Renewables Coalition, the Independent Energy Producers Association, the Cogeneration Association of California, and the Energy Producers and Users Coalition's (collectively, the "QF Parties") request for an order shortening time on their January 6, 2006 Motion for Interlocutory Relief ("the Motion").

The Motion was filed in response to a November 29, 2005 Administrative Law Judge's ruling that was issued during a prehearing conference in the above-referenced proceedings.

Immediately after the ruling was issued, counsel for the Cogeneration Association of California and the Energy Producers and Users Coalition requested, and was granted, leave to file the instant motion for interlocutory relief. However, although the Motion does little more than rehash arguments previously rejected by the Administrative Law Judges, the QF Parties waited *nearly six weeks* to file the Motion and now seek an order requiring responses by 10:00 a.m. on January 12, 2006 – effectively within only three business days.

The QF Parties have failed to show good cause why the normal time for filing responses should be shortened. Indeed, the purported necessity for an order shortening time was caused entirely by the QF Parties' own delay in filing the Motion. Under these circumstances, an order granting the relief requested would be unreasonable, could prejudice PG&E and other parties, and would fail to adhere to the most basic due process requirements.

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Therefore, PG&E respectfully requests that the Administrative Law Judge deny the QF Parties' request for an order shortening time and permit PG&E to file its response within the standard 15-day period provided by Rule 45(f) of the Commission's Rules of Practice and Procedure.

Respectfully submitted,

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By: 
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Dated: January 9, 2006

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department, 77 Beale Street, B30A-2482, San Francisco, California 94105. I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service the same day it is submitted for mailing.

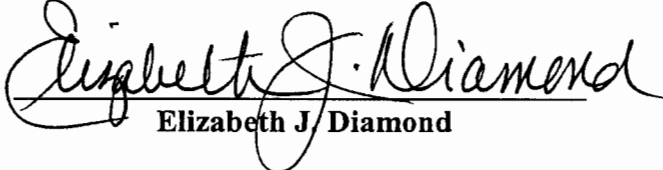
On January 9, 2006, I served a true and correct copy of

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on all parties identified on the California Public Utilities Commission's Docket No's. R.04-04-003 and R.04-04-025. Service was completed by serving said document, via electronic mail, to the parties who provided electronic mail addresses appearing on the respective Service Lists on the CPUC website.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 9, 2006


Elizabeth J. Diamond