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LAWRENCE V. ROBERTSON, JR.
ATTORNEY AT LAW

P. O. BOX 1448
TUBAC, ARIZONA 85646

(520) 398-0411
FAX: (520) 398-0412
EMAIL: TUBACLAWYER@AOL.COM

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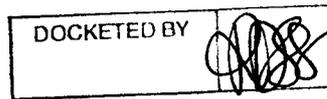
OF COUNSEL TO
MUNGER CHADWICK, P.L.C.

December 29, 2009

Arizona Corporation Commission
DOCKETED

DEC 30 2009

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007



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ARIZONA CORPORATION
COMMISSION
DOCKET CONTROL

Re: Sempra Energy Solutions LLC
Docket No. E-03964A-06-0168

To Whom It May Concern:

Enclosed for filing in the above-referenced proceeding are the original and thirteen (13) copies of a Response to Staff's Motion for An Extension of Time ("Response"), on behalf of Sempra Energy Solutions LLC.

Also enclosed are two (2) additional copies of the Response. I would appreciate it if you would "filed" stamp the same and return them to me in the enclosed stamped and addressed envelope.

Thank you for your assistance. Please advise Mr. Robertson or me if you have any questions.

Sincerely,

Angela R. Trujillo
Secretary

Lawrence V. Robertson, Jr.

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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

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- KRISTIN K. MAYES, Chairman**
- GARY PIERCE**
- PAUL NEWMAN**
- SANDRA D. KENNEDY**
- BOB STUMP**

ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF) DOCKET NO. E-03964A-06-0168
 SEMPRA ENERGY SOLUTIONS LLC FOR)
 APPROVAL OF A CERTIFICATE OF) SEMPRA ENERGY SOLUTION'S
 CONVENIENCE AND NECESSITY FOR) RESPONSE TO STAFF'S MOTION
COMPETITIVE RETAIL ELECTRIC SERVICES) FOR AN EXTENSION OF TIME

Sempra Energy Solutions LLC ("SES") hereby responds to the Commission's Utilities Division Staff ("Staff") Motion for Extension of Time ("Motion") within which to issue the report and recommendation(s) required of the Staff by Decision No. 70485. As noted in the Staff's Motion, the aforesaid report and recommendation(s) are currently due on December 31, 2009.

SES strongly opposes the Staff's request for an extension of an additional 120 days within which to file the aforesaid report and recommendation(s). Decision No. 70485 was issued on September 3, 2008, or approximately 16 months ago. In the interim, the processing of SES' April 2006 Application for an Electric Service Provider CC&N has been suspended pending receipt of the Staff report and recommendation(s).

In addition to its reliance upon "Staff's workload" as a basis for the extension request, the Staff also cites

"... unresolved issues associated with Docket No. E-20690A-09-0346, a pending case that may influence issues related to electric retail competition." [Motion at page 1, lines 16-18] [emphasis added]

However, the Staff offers no explanation as to the perceived nexus between the instant proceeding and Docket No. E-20690A-09-0346, which involves a determination as to whether a particular solar services provider (SolarCity Corporation) should be regulated as a public service

LAWRENCE V. ROBERTSON, JR.
 ATTORNEY AT LAW
 P.O. Box 1448
 Tucson, Arizona 85646
 (520) 398-0411

LAWRENCE V. ROBERTSON, JR.
ATTORNEY AT LAW
P.O. Box 1448
Tubac, Arizona 85646
(520) 398-0411

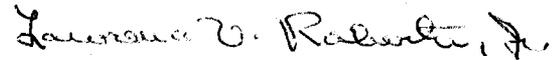
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corporation. As the Commission is aware, the Commission has previously determined that competitive retail Electric Service Providers are to be regulated as public service corporations, so the linkage between the instant proceeding and the "pending case" referenced in the Staff's Motion would appear to be tenuous at best, if not non-existent.

SES does not object to a 30-day extension of the deadline for filing of the Staff report and recommendation(s) in the instant proceeding. However, it strongly opposes the requested 120-day extension.

Dated this 29th of December 2009.

Respectfully submitted,



Lawrence V. Robertson, Jr.
Attorney for Sempra Energy Resources LLC

The original and thirteen (13) copies of the foregoing Response are being mailed for filing this 29th day of December 2009 to:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

A copy of the foregoing Response will be mailed or emailed this same date to:

All Parties of Record