

<b>DOCKETED</b>	
<b>Docket Number:</b>	19-RPS-01
<b>Project Title:</b>	Petition for Rulemaking re: Public Utilities Code, section 399.30(c)(4)
<b>TN #:</b>	228373
<b>Document Title:</b>	Steve Uhler Comments Perhaps the Public Adviser has overlooked 20 CCR § 2554
<b>Description:</b>	N/A
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<b>Organization:</b>	Steve Uhler
<b>Submitter Role:</b>	Applicant
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*Comment Received From: Steve Uhler*  
*Submitted On: 5/22/2019*  
*Docket Number: 19-RPS-01*

**Perhaps the Public Adviser has overlooked 20 CCR Â§ 2554**

*Additional submitted attachment is included below.*

Perhaps the Public Adviser has overlooked 20 CCR § 2554?

By placing "PAO Response to Uhler 5-22-19" <https://efiling.energy.ca.gov/GetDocument.aspx?tn=228371> into the record for the proceeding 19-RPS-01 for reviewing evidence and argumentation, including legal reasoning set forth by opposing parties to come to a decision which determines rights and obligations between the parties involved, the Public Adviser may of overlooked 20 CCR § 2554.

20 CCR § 2554. The Adviser's Duty to Refrain from Advocating Substantive Positions.

In performing duties to the commission, including those duties discharged by advising the public, the adviser shall not represent any members of the public, nor shall he advocate any substantive position on issues before the commission.

Please see that <https://efiling.energy.ca.gov/GetDocument.aspx?tn=228371> is removed from the record.

Perhaps the Energy Commission's Chief Counsel should inform the Public Adviser of 20 CCR § 2554. The Adviser's Duty to Refrain from Advocating Substantive Positions?

Energy Commission's Chief Counsel should feel free to advocate the same substantive position and take responsibility for such a statement, if it is to be placed into the record for 19-RPS-01.

take care,

Steve Uhler  
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