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January 25, 2010

Paul Clanon, Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Request for Extension of Time to File 2010 Rate Design Window Application and 2-Part Peak Time Rebate Proposal

Dear Mr. Clanon:

Pacific Gas and Electric Company (PG&E) requests an extension of time to February 26, 2010 to file its 2010 Rate Design Window (RDW) Application and the 2-part Peak Time Rebate (PTR) residential rate proposal that Decision (D.) 09-03-026, Ordering Paragraph (OP) 9, requires PG&E to present in its RDW application.

The filing date for the 2010 RDW application normally would be November 25, 2009. On October 16, PG&E requested an extension to January 29, 2010 to file its 2010 RDW with its 2-part PTR proposal. That request was granted on October 23, 2009.

PG&E now requests a second extension to file its 2010 RDW application because it recently determined that transitioning approximately 4.5 million residential customers (who will have SmartMeter™ devices by the end of 2010) to the interval billing necessary for PTR by May 2011 poses previously-unanticipated issues. Specifically, increasing the volume of interval billing for non-residential customers to the volume needed for 4.5 million residential customers presents scaling difficulties that were not anticipated earlier, as well as the need for business processes that were not identified previously. Based on this, PG&E strongly believes that its transition of these millions of residential customers to interval billing must occur in stages. PG&E also has determined that the schedule for these stages depends on how the over-subscription of its Information Technology resources for the numerous customer rate and billing requirements from the Commission's various mandates will be deployed. Consequently, PG&E needs more time to prepare the showing for the staged transition and for the scheduling issues. PG&E believes that including this information in the record of the 2010 RDW case is important.

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Therefore, PG&E requests that you expeditiously grant an extension to February 26, 2010 for PG&E to file its 2010 RDW and 2-part PTR proposal.

Very truly yours,

Brian K. Cherry (sc)

Brian Cherry, Vice President
Regulatory Relations

Cc: Karen Clopton, Chief ALJ
Andrew Campbell, Commission Advisor
Steve Roscow, Energy Division
Bruce Kaneshiro, Energy Division
Christopher Danforth, Division of Ratepayer Advocates
Mike Florio, The Utility Reform Network
A.07-12-009 and A.09-02-022 Service Lists