



**Pacific Gas and
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March 17, 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 April 1, 2010 Load Impact Reports.

Dear Mr. Clanon:

Pacific Gas and Electric Company (PG&E) on behalf of itself, Southern California Edison Company (SCE) and San Diego Gas and Electric Company (SDG&E) requests an extension of time to file the Load Impact Reports due April 1, 2010 under D.08-04-050 because on March 9, 2010, the Proposed Decision of ALJ Hecht (Proposed Decision) was issued. This Proposed Decision, if adopted, would change the filing requirement for load impact reports under D.08-04-050. PG&E requests an extension for filing the Load Impact Reports due April 1, 2010, until 10 business days after the Commission acts on the Proposed Decision.

The contents of the Load Impact Reports are governed by the protocols adopted in D.08-04-050 subject to the directions of the Demand Response Measurement Evaluation Committee (DRMEC). The Proposed Decision grants in part and denies in part a Petition for Modification filed by PG&E to simplify the filing requirements associated with the annual demand response load impact reports. The Proposed Decision recognizes the difficulties with filing the reports with the Docket Office:

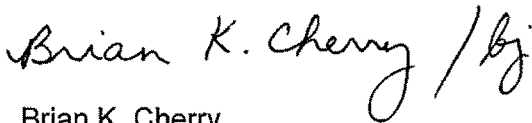
Depending on the number of demand response programs on which the utility must report, the preparation of all tables required by the load impact protocols may require more than one hundred thousand tables. Since these reports are too large to be filed electronically, they must be filed in hard copy, which, under the Commission's usual practices, means printing all of these (thousands of) tables. In order for the content of each table to remain legible, each table fills a full printed page. The Commission understands that it is both impractical and potentially wasteful of paper and other resources to print thousands of pages of tables, especially when there are other options for storage of this data, such as web posting and CD-ROMS.

(Proposed Decision, pages 4 and 5.) The Proposed Decision would modify the filing requirements in OP 4, D.08-04-050 to require filing of an executive summary of the load impact report along with several summary tables. The entire report would still be prepared with all the information and tables required in Protocol 26, but it would not be filed with the docket office. Instead, the entire report would be submitted to the Energy Division on CD-ROM and posted on an internet website where all parties could access it.

The Proposed Decision's revised filing requirements would avoid overburdening the Commission's Docket Office, as described on page 5 of the Proposed Decision. However, the Proposed Decision will not come before the Commission for a vote until after April 1, 2010. Consequently, unless the time to file the April 1, 2010 Load Impact Reports is extended, PG&E, SCE, SDG&E and the Docket Office will face a repeat of the difficulties encountered with last year's load impact report filing (which were described in PG&E's Petition to Modify, as paraphrased on pages 2 and 3 of the Proposed Decision.)

Therefore, in light of the Proposed Decision, PG&E requests an extension for the Load Impact Report filing due April 1, 2010 until 10 business days after the Commission acts on the Proposed Decision. This request will not affect submittal of the full load impact report to the Energy Division on April 1, 2010, nor will it change the April 1, 2010 date for posting the load impact report on a website where all parties can access it. PG&E, SCE and SDG&E would still meet the April 1, 2010 date for those two requirements. Approving this request for an extension would only allow PG&E, SCE and SDG&E to conform the Docket Office filing to what is required under the Commission's final decision on the Petition to Modify, and avoid the problems described in the Proposed Decision if the April 1, 2010 filing date is not extended.

Very truly yours,



Brian K. Cherry
VP, Regulatory Relations

cc: Commissioner Dian Grueneich
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Demand Response Measurement and Evaluation Committee