



**Pacific Gas and
Electric Company™**

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February 8, 2011

VIA E-MAIL AND MAIL

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

Re: Request for Extension to Submit Advice Letter in Compliance with D.10-12-048

Dear Director Clanon:

The Commission established a Renewable Auction Mechanism (“RAM”) in D.10-12-048 (the “RAM Decision”) and ordered certain load-serving entities, including Pacific Gas and Electric Company (“PG&E”), to file advice letters implementing the RAM Decision by no later than 60 days following its issuance. The RAM Decision leaves a number of important and complicated implementation issues to be resolved through the utilities’ compliance filings. For example, the RAM Decision requires PG&E to develop a standard form power purchase agreement (“PPA”) for the RAM program, requires PG&E to propose detailed solicitation protocols, requires the utilities to coordinate proposals regarding the timelines and process for the RAM implementation,^{1/} and directs the utilities to consult with Commission staff regarding the advice letter prior to filing.^{2/}

The RAM Decision issued on December 17, 2010, making PG&E’s implementation advice filing due on February 15, 2011. The already short period of time granted to PG&E to develop its implementation filing was effectively further shortened by the intervening holidays. In light of the complexity of the implementation filing and the lack of availability of some parties during the holiday period, PG&E respectfully requests a ten-day extension to make its RAM advice filing pursuant to Commission Rule of Practice and Procedure 16.6. The revised due date would be February 25, 2011. Assuming the Commission also grants San Diego Gas & Electric

^{1/} See D.10-12-048 at 33.

^{2/} See *id.* at 75.

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Company's January 28, 2011 request for a 30-day extension for its RAM advice filing, PG&E's requested extension would probably not delay the implementation of the RAM.^{3/}

Respectfully submitted,



M. Grady Mathai-Jackson

cc: Karen Clopton, Chief Administrative Law Judge
Service List for R.08-08-009 (via E-Mail)

^{3/} The RAM Decision requires each of the IOUs' RAM auctions to be held simultaneously. *Id.* at 33.