



**Pacific Gas and  
Electric Company®**

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February 4, 2011

Paul Clanon, Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue, 5<sup>th</sup> Floor  
San Francisco, CA 94102

Re: Request for Extension to Comply with Order Number 2 and Order Number 3 of  
Resolution G-3440, dated September 2, 2010

Dear Mr. Clanon:

I am writing to request an extension of time for Pacific Gas and Electric Company (PG&E) to comply with Orders Number 2 and 3 of Resolution G-3440. Specifically, PG&E requests a 90-day extension of these audit and reporting requirements such that PG&E would complete its first audit of its records, documents and data related to issuing imbalance statements and accounting adjustments to Core Transport Agents (CTAs) no later than June 2, 2011. PG&E would provide a written report to the Director of Energy Division no later than July 1, 2011.

Order Number 2 requires PG&E to "audit each record, document and all data related to preparing and issuing imbalance statements and accounting adjustments to CTAs." PG&E is required to complete the first of these audits no later than 6 months from the effective date of Resolution G-3440, which is September 2, 2010. This would mean that absent an extension, the first audit must be completed by March 2, 2011.

Order Number 3 requires that a written report of this audit be issued to the CPUC Energy Division no later than 30 days after the completion of the audit, or by April 1, 2011.

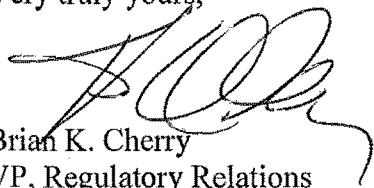
While PG&E has begun the audit process, we require additional time to comply with Orders Number 2 and 3 due to recent competing demands on resources in PG&E's gas business. This is coupled with the fact that the audit of CTA imbalance statements and accounting adjustments is a new requirement and does not have long established procedures and reporting templates in place to support it. We expect to complete the audit by June 2, 2011 and to issue the required report no later than 30 days thereafter (July 1, 2011).

Paul Clanon  
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Subject to California Public Utilities Commission Rules of Practice and Procedure 16.6, we are submitting this letter to you by email and messenger prior to February 27, 2011 and have served copies on all parties on the service list for PG&E Advice Letter (AL) 3033-G.

Thank you for your attention to this request for extension.

Very truly yours,



Brian K. Cherry  
VP, Regulatory Relations

cc: Julie Fitch, Energy Division  
Gurbux Kahlon, Energy Division  
Richard Myers, Energy Division  
Eugene Cadenasso, Energy Division  
Service List for A.05-10-019

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL OR U.S. MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Regulatory Relations Department B10C, 77 Beale Street, San Francisco, California 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On February 4, 2011, I caused to be served a true copy of:

**REQUEST FOR EXTENSION TO COMPLY WITH ORDER NUMBER 2 AND ORDER NUMBER 3 OF RESOLUTION G-3440, DATED SEPTEMBER 2, 2010**

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for A.05-10-019 with an e-mail address.

[XX] By U.S. Mail – by placing it for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to all parties of record on the service list for A.05-10-019 who do not have an email address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 4, 2011, at San Francisco, California.

/s/ BERNADETTE JOAQUIN

Bernadette Joaquin  
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Last Updated on 06-JAN-2011 by: CPL  
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