



**Pacific Gas and
Electric Company™**

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January 11, 2012

**VIA EMAIL AND HAND
DELIVERY**

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

Re: R.08-12-009: Request for Extension of Time to Comply with January 30, 2012
Deadline in Decision 11-07-056 for Filing Applications to Provide Third Party Access
to Customer Energy Usage

Dear Mr. Clanon:

Pursuant to Rule 16.6 of the California Public Utilities Commission's Rules of Practice and Procedure, for the reasons set forth below, Pacific Gas and Electric Company respectfully requests, on behalf of itself, Southern California Edison Company, and San Diego Gas & Electric Company (collectively, the Utilities), an extension of time to comply with the deadline to file applications to provide third-party access to customer energy usage data via the utility's backhaul. The January 30, 2012 deadline for filing these applications was established in *Decision (D.) 11-07-056 Adopting Rules to Protect the Privacy and Security of the Electricity Usage Data of the Customers of Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company*, issued July 28, 2011, in Rulemaking 08-12-009 (Decision).

The Utilities request a brief extension of time (one month, from January 30, 2012, to March 5, 2012) to comply with the deadline in the Decision in light of the Decision's requirement that the utilities collaborate on key common implementation issues relating to third-party access to customer energy usage data, such as required tariff changes; third-party eligibility criteria; whether a registration process is necessary and, if so, what it would look like; maintaining consistency with ongoing national standards efforts, such as the "Green Button" initiative; establishing common data and communications interface formats; and ensuring compatibility with each utility's Advanced Metering Infrastructure (AMI) and billing systems. (Ordering Paragraph 8 of the Decision.)

In addition, the Energy Division held a very helpful public workshop on December 12, 2011, in which Commission staff, interested third parties, customer groups and the IOUs exchanged informal information and views on how an automated system for third-party access to customer

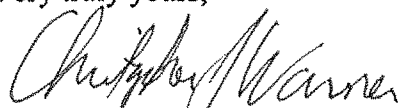
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energy usage data can and should be designed and structured to encourage new products and services from third parties while at the same time meeting the Commission's needs to protect the security and privacy of customer information. The Utilities believe a one-month extension of the time for filing applications will help them design a more streamlined, customer-friendly, cost-effective automated third-party access process that addresses the views expressed at the December 12 workshop. The additional time will also help the Utilities minimize inconsistencies among the three applications, to the extent feasible, in accordance with a request by the Energy Division's staff at the recent workshop. The delay will not harm customers or third-parties, because customers and third parties currently have access to customer energy usage data via manual requests and the automated, web-based "Green Button" initiative recently implemented by the Utilities.

In summary, for the reasons stated above, the Utilities seek a one month extension of time to March 5, 2012, to submit their respective applications in compliance with Ordering Paragraph 8 of D.11-07-056.

Time is of the essence with respect to this request. Thus, we greatly appreciate your prompt consideration of this matter. Counsel for SCE and SDG&E have authorized PG&E to file this request on their behalf.

Very truly yours,



Christopher J. Warner

CJW/mw

cc: All parties to R.08-12-009
Chief Administrative Law Judge Karen Clopton
ALJ Timothy Sullivan
Elizaveta I. Malashenko, Energy Division
Christopher Villareal, Policy and Planning Division
Fadi Khoury, Esq., SCE
Allen Trial, Esq., SDG&E