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Sent: 2/10/2012 3:15:22 PM

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Cc:

Bcc:

Subject: R07-05-025, Request for Extension Under Rule 11.6

Administrative Law Judge Pulsifer:

Pursuant to Commission Rule 11.6, Pacific Gas and Electric Company ("PG&E"), Southern California Edison Company ("SCE"), and San Diego Gas & Electric Company ("SDG&E") (jointly the "IOUs") respectfully request an extension of time to file the opening comments required by the *Assigned Commissioner's Ruling and Amended Scoping Memo* ("Scoping Memo") issued on February 8, 2012 in this proceeding.

The Scoping Memo directed the IOUs to submit opening comments on February 24, 2012 presenting proposals for the determination of financial security requirements and related re-entry fees, as well as proposals for how to distinguish between large and small customers. The IOUs are requesting an extension of this deadline from February 24, 2012 to March 16, 2012.

An extension is appropriate for several reasons. First, proposals for financial security requirements will likely take some time to develop considering the number of issues already raised in this proceeding regarding such requirements. Second, all of the parties in this proceeding would likely benefit if the IOUs are able to develop a single, joint proposal. However, developing a single IOU proposal will take some time to coordinate among the IOUs and to allow sufficient time for internal review at each of the IOUs. Third, developing proposals for differentiating small and large customers will also take time because the IOUs will need to review their respective customer data to determine if there are ways to readily distinguish between customers. All of the parties will benefit from carefully considered and developed proposals, which will take more than the approximately two weeks provided in the

Scoping Memo.

Consistent with the requirements in Rule 11.6, on February 9, the IOUs sent an e-mail to the service list indicating that they intended to request an extension and making “a good-faith effort to ask [] parties to agree to the extension.” Jan Reid of Coast Economic Consulting indicated that he would support the extension if reply comments are extended to March 30, 2012. The Alliance for Retail Energy Markets, Direct Access Customer Coalition and Marin Energy Authority indicated that they had no objection to requested extension, but requested that the date for reply comments be extended to April 6, 2012.

The IOUs do not object to date for reply comments being extended to April 6, 2012.

Please let us know if you need any additional information and thank you for your consideration in this matter.

Charles Middlekauff, PG&E

On Behalf of the IOUs

cc: R.07-05-025 Service List

NOTE: The recipient portion of this e-mail may not reflect all the addressees who are being served. The service list has been split into 20-addressee groups, to avoid rejection by CPUC and other e-mail servers.

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