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March 20, 2014

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

**Re: R.09-08-009: Request for Extension of Deadlines Established in Decision 13-11-002 for Declaring Intent to Participate In Submetering Pilot Phase 1 and to begin Phase 1 Open Enrollment**

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, San Diego Gas & Electric respectfully requests, on behalf of itself, Pacific Gas and Electric Company, and Southern California Edison Company (collectively, the Utilities), an extension of time to comply with April 1 and May 1, 2014 milestones for the electric vehicle (EV) submeter pilot established in Decision 13-11-002, Decision Modifying the Requirements for the Development of Plug-In Electric Vehicle Submetering Protocol, issued November 19, 2013, in Rulemaking 09-08-009 (Decision). The April 1 milestone is the deadline to declare intent to participate in submetering pilot phase 1. The May 1, 2014 milestone is for beginning Phase 1 Single Customer of record applications, and Open Enrollment.

On January 21, 2014, the Utilities filed a Joint Tier 2 Advice Letter (SDG&E - 2566-E, SCE - 2993-E and PG&E - 4343-E) seeking approval of the pilot requirements, forms, and budgets. The advice letter was protested by several parties on February 10, 2014. A Commission resolution addressing the disposition of the advice letter has not yet been issued.

The Utilities request a brief extension of time to comply with the April 1 and May 1, 2014 milestones in the Decision, to allow resolution of the pending Utility Joint Advice Letter. Granting the requested extension would allow additional time for the pilot forms to be approved and provided to pilot participants as well as provide clarity on the allowed incentives. Allowing sufficient time for all stakeholders to understand the terms and conditions of the pilot before commencing implementation of the pilot is essential to ensure a successful pilot.

The Utilities respectfully request an extension of time for the two milestones from April 1, 2014 to declare the intent to participate and from May 1, 2014 to commence Phase 1 and begin Open Enrollment until 15 days and 45 days, respectively, after the time the above referenced disposition letter is issued. Further, the Utilities, in like manner, also request that all subsequent events and dates set forth in the Decision be adjusted to reflect the revised pilot start date. Time is of the essence with respect to this request. Thus, we greatly appreciate your prompt consideration of this matter

Sincerely,

/s/ *Steven D. Patrick*

Steven D. Patrick

Attorney for San Diego Gas & Electric Company

cc: Regina DeAngelis, Administrative Law Judge  
Irene K. Moosen, Administrative Law Judge  
Edward Randolph, Director – Energy Division  
Adam Langton, Energy Division  
Noel Crisostomo, Energy Division  
Christopher Warner, Esq., PG&E  
Andrea Tozer, Esq., SDG&E  
Service List for **R.09-08-009**  
Service List for **R.13-11-007**