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February 26, 2014

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

Re: Request for a one year extension to comply with D.10-02-032, OP 2, as modified by D.11-11-008, OP 1 a. and OP 1 d., for defaulting small and medium agricultural customers who would have defaulted to mandatory Time-of-Use rates beginning March 1, 2014 to begin their default on March 1, 2015.

Dear Mr. Clanon:

Pursuant to Rule 16.6 of the California Public Utilities Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E), respectfully request your approval of a one year extension for defaulting small and medium agricultural customers who would have defaulted to mandatory Time-of-Use (TOU) rates on March 1, 2014, to instead start defaulting to TOU on March 2, 2015.

<u>Background:</u> Decision10-02-032, OP 2, as modified by D.11-11-008, OP 1 a. and d., ordered PG&E to implement default mandatory TOU rates for small and medium agricultural customers beginning March 1, 2013, and on an annual basis each March 1 thereafter. The customer also must have 12 months of interval data available before defaulting. In addition the tariffs for small and medium agricultural customers require 45 days prior notice before the customer defaults.¹ This allows the customer to access its interval data and the on-line tools that are required in D.10-02-032, page 108. Implementation occurred smoothly for March 1, 2013.

For this year, however, the 45 day notification has not gone out to small and medium agricultural customers who were scheduled to default on March 1, 2014. PG&E is still investigating the reason the notification did not go out when scheduled, but we think that there may have been communication missteps involving the automated system for sending the notification. Since the customers have not received notification in time for a March 1, 2014 default to mandatory TOU, PG&E believes that the current circumstances warrant delaying their default for one year to March 1, 2015.

¹ For example, this provision is contained in PG&E schedules Ag-1, Ag-4, Ag-5.

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<u>Relief Requested in this letter</u>. For this reason, PG&E requests a one year extension for defaulting small and medium agricultural customers scheduled for March 1, 2014, to instead default them mandatory TOU beginning March 1, 2015.

Very truly, yours,

Brian K. Cherry Vice President, Regulatory Relations

cc: Karen Clopton, Chief ALJ, CPUC Jennifer Caron All Parties of Record in A.09-02-022