## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



April 7, 2014

File No.: R.09-08-009 and R.13-11-007

Steven Patrick Attorney San Diego Gas & Electric Company 555 W. Fifth Street Los Angeles, CA 90013-1034

e-mail: SDPatrick@semprautilities.com

RE: 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. Patrick:

This letter responds to your March 20, 2014 letter requesting an extension of time to comply with the April 1, 2014 and May 1, 2014 deadlines for implementing submetering pilots included in Decision 13-11-002. Your request for an extension is made on behalf of Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Pacific Gas and Electric Company (PG&E) pursuant to Rule 16.6 of the Commission's Rules of Practice and Procedure.

Decision 13-11-002 requires that the above utilities allow third-party participants to declare their intent to participate in the submetering pilot by April 1. The same Decision requires that the utilities begin the pilot by May 1, 2014. The utilities jointly submitted a Tier 2 advice letter to implement electric vehicle submetering pilots to the Commission by January 21, 2014. Energy Division staff is currently reviewing the advice letter. SCE, SDG&E and PG&E now jointly request an extension to these two deadlines to allow for resolution of the requests in the advice letter. The Commission received no opposition letter to this request.

I recognize the need to extend the deadline due to Energy Division staff's continuing review of the joint utility submetering implementation advice letter. Today's letter continues the extension for the two deadlines mentioned above until 15 and 45 days, respectively, after the Commission has approved the joint utility submetering implementation advice letter.

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SDG&E must promptly inform all parties of Rulemaking (R.) 09-08-009 and R.13-11-007 of the extension via email and must state in the opening paragraph of the notification that the Executive Director authorized the extension (Rule 16.6).

Sincerely,

for Paul Clanon

**Executive Director** 

E-mail cc: Ed Randolph, Energy Division Director

Regina DeAngelis, Administrative Law Judge Irene Moosen, Administrative Law Judge Damon Franz, Supervisor, Energy Division

Adam Langton, Energy Division Noel Crisostomo, Energy Division

Attachment: March 20, 2014 Letter from Steven Patrick



March 20, 2014

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

555 W. Fifth Street Los Angeles, CA 90013-1034

Tel: 213-244-2954 SDPatrick@semprautilities.com

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.

Mr. Paul Clanon Page 2 March 20, 2014

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