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September 15, 2014

Energy Division Tariff Unit  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Subject: Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company's Comments to Draft Resolution E-4677 Approving the 21<sup>st</sup> Century Energy Systems Research and Development Projects and Cooperative Agreement (PG&E Advice 4402-E, SCE Advice 3030-E, and SDG&E Advice 2592-E (Joint Utilities AL))**

Dear Energy Division Tariff Unit:

Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E), collectively known as the Joint Utilities, respectfully submit its comments on Draft Resolution E-4677 (Draft Resolution), which approves the proposed California Energy Systems for the 21<sup>st</sup> Century (CES-21) projects, budgets, and cooperative research and development agreement (CRADA), subject to a compliance filing incorporating modifications identified in the Draft Resolution.

The cyber security and grid integration business cases presented in the Joint Utilities AL sufficiently describe the proposed work to be completed. At the same time, in light of the Office of Ratepayer Advocates' (ORA's) protest and the consensus meeting convened by California Public Utilities Commission (Commission) Staff, the Joint Utilities generally support the recommendations outlined in the Draft Resolution to amend these business cases with additional project specific information.

The Joint Utilities request that the Commission clarify that the compliance filing required by Ordering Paragraphs 2, 3, and 4 be filed within 5 business days of the approval of the Resolution.

For the cyber security project, the Joint Utilities request that the Draft Resolution be modified to specify that when a critical pathway is being contemplated to change or be nullified, the Joint Utilities notify the Director of Energy Division, or the Director's designee, via a letter and not an advice filing.

In order to make the most efficient use of Commission Staff's time, the Joint Utilities propose to provide a transportable "reading room" at the Commission's San Francisco office. The Joint Utilities will make confidential documents concerning status updates of the cyber security project available for designated Commission staff to read and review.<sup>1</sup>

Lastly, the Joint Utilities request that Southern California Edison Company's advice letter number referenced at the bottom of page 1 of the Draft Resolution be corrected from "4040-E" to "3030-E" in the final resolution.

The Joint Utilities commend the Commission on a well-balanced Draft Resolution and support the timely approval of Resolution E-4677.

Sincerely,

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Meredith Allen  
Senior Director, Regulatory Relations

cc: President Michael R. Peevey  
Commissioner Michel P. Florio  
Commissioner Carla J. Peterman  
Commissioner Michael Picker  
Commissioner Catherine J.K. Sandoval  
Karen V. Clopton, Acting General Counsel  
Timothy J. Sullivan, Acting Chief Administrative Law Judge  
Edward Randolph, Director, Energy Division  
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Damon Franz, Energy Division, CPUC  
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Service Lists: A.11-07-008 and R.13-12-010  
Chloe Lukins, ORA  
Megan Caulson, SDG&E  
Megan Scott-Kakures, SCE  
Leslie E. Starck, SCE

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<sup>1</sup> Due to the confidential nature of cyber security documents, designated Commission staff will not be allowed to remove documents from the reading room, nor will pictures be allowed.