

August 26, 2005

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

Re: R.04-01-006 - Request for Additional Extension to File
the Annual Estimate of CARE-Eligible Customers

Dear Mr. Larson:

Southern California Edison Company (SCE) on behalf of itself, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Gas Company (the Joint Utilities) respectfully request an extension of time to file an update of current demographic CARE-eligibility rates from September 15, 2005 to October 15, 2005.

In SCE's PHC Statement for the May 18, 2004 Low-Income Programs Prehearing Conference, SCE and the other utilities requested a new annual filing date of October 15. When SCE raised this issue at the PHC, Energy Division inquired if we could comply with a September 15 submittal date. We indicated this would depend on the availability of the vendor data. ALJ Thomas indicated we could come back and ask for a filing extension if late availability made it impossible to meet the September 15 deadline. On June 24, 2004, Commissioner Wood and ALJ Thomas issued a scoping memo approving a change in the due date of this annual filing from June to September 15. In 2004, the utilities requested and received an extension to file on October 15, 2004 due to the data being unavailable. Given that we find ourselves in the same situation as last year, the utilities believe that a permanent change in the filing date from September 15 to October 15 of each year is desirable.

The utilities' contractor, Athens Research has received billing data from all of the utilities for the 2005 estimates. Athens Research estimates it will not receive Applied Geographic Solutions (AGS) clean data from a third-party vendor that is being updated to reflect 2005 household income and eligibility estimates until September. Athens Research will need adequate time to process the third-party and utility data to develop the new estimates. The utilities, therefore, request an October 15 submittal date for 2005 and for all future annual submittals as well

Thank you for your consideration of this request. If you have any questions, please contact me at (626) 302-2570.

Very truly yours,

Larry R. Cope

cc: All Parties of Record
ALJ Steven Weissman

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