

August 15, 2006

VIA OVERNIGHT MAIL

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

Re: R.04-01-006 - Request for 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 (collectively, the "Joint Utilities"), respectfully requests an extension of time from September 15, 2006 to October 15, 2006 to file an update of the current demographic CARE-eligibility rates.

In SCE's PHC Statement for the May 18, 2004 Low-Income Assistance Programs Prehearing Conference, SCE and the other utilities requested a new annual filing date of October 15. When SCE raised this issue at the Prehearing Conference, 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. Administrative Law Judge (ALJ) Thomas indicated that the utilities could request 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 Joint Utilities requested and received an extension to file on October 15, 2004 due to the data being unavailable. In 2005, again because data was unavailable, the Joint Utilities requested and received an extension to file on October 15, 2005. Given that we find ourselves in the same situation as the prior two years, the Joint Utilities believe that a permanent change in the filing date from September 15 to October 15 of each year is desirable.

The Joint Utilities' contractor, Athens Research, will receive billing data from all of the Joint Utilities in time for the 2005 estimates. Athens Research estimates that it will not receive Applied Geographic Solutions' (AGS) clean block group level data updating the 2000 census until September. Athens Research will need adequate time to process the AGS and utility data in order to develop the new estimates. The Joint Utilities, therefore, request an October 15 submittal date for 2006 and once again request that the submittal date be changed to October 15 for all future annual submittals as well.

Thank you for your consideration of this matter. If you have any questions, please contact me at (626) 302-3712.

Very truly yours,

/s/ Stacie Schaffer
Stacie Schaffer

cc: All Parties of Record (R.04-01-006)
ALJ Steven Weissman
ALJ Kim Malcolm

SS:ss:Law#1293398