

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-IEPR-02
<b>Project Title:</b>	Electricity Resource Plans
<b>TN #:</b>	260139
<b>Document Title:</b>	Response Letter 2024-11-12 Response to SFPUC Ext of Time Req
<b>Description:</b>	Request for Extension of Time to File Transmission Form T-1 – Docket No. 24-IEPR-02
<b>Filer:</b>	Raquel Kravitz
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	11/18/2024 3:45:55 PM
<b>Docketed Date:</b>	11/18/2024



**CALIFORNIA  
ENERGY COMMISSION**



November 18, 2024

## Via Email

Grace Kay  
Manager, Power Enterprise, Legislative and Regulatory Affairs  
City and County of San Francisco, San Francisco Public Utilities Commission  
525 Golden Gate Avenue, San Francisco, CA 94102  
[gkay@sfgov.org](mailto:gkay@sfgov.org)

## Request for Extension of Time to File Transmission Form T-1 – Docket No. 24-IEPR-02

Dear Grace Kay:

The California Energy Commission (CEC) received the Request for an Extension of Time to File Transmission Form T-1 (application) submitted by San Francisco Public Utilities Commission (applicant) on November 12, 2024, for data submitted in the 2024 Integrated Energy Policy Report (IEPR) Update proceeding. This data is required to be provided to the CEC pursuant to the Forms and Instructions for Submitting Electricity Resource Plans (Forms and Instructions) adopted by the CEC on August 14, 2024<sup>1</sup>. The application requests the due date to receive the Transmission Form T-1 be extended from November 15, 2024,<sup>2</sup> to February 14, 2025.

The request to extend the due date for this data is made pursuant to California Code of Regulations, title 20, section 1342,<sup>3</sup> as specified in the Forms and Instructions. The applicant asserts that the requested data cannot be submitted by the specified due date because this is the first instance in which the CEC requests SFPUC to file Transmission Form T-1. The application also states additional time is needed to collect, validate and accurately compile the information requested

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<sup>1</sup> [TN258523](#).

<sup>2</sup> The deadline is specified in the Forms and Instructions. [TN258177](#), p. 3.

<sup>3</sup> Unless noted, all subsequent references will be to Title 20 of the California Code of Regulations.

## Consideration of Request

As discussed above, the Forms and Instructions directs load serving entities that need additional time to file a request pursuant to §1342. This provision is applicable to “[e]xtensions of time specified in [the regulations].”<sup>4</sup> The deadlines specified in the Forms and Instructions are not otherwise specified in the regulations; however, the CEC is using the process established in §1342 to streamline the consideration of requests for deadline extensions in these circumstances. An extension shall be granted pursuant to this provision if the application includes the information set forth in §1342(c)(1), including “the reasons why the report cannot be, or may not be able to be, submitted on time, and the date the report will be submitted,” and if the Executive Director finds that good cause exists for an extension and that the report is likely to be submitted by the extended due date pursuant to §1342(c)(2).

## Executive Director’s Determination

The executive director concludes that the request meets the requirements of §1342(c) and finds good cause to grant an extension of the deadline for Transmission Form T-1 to February 14, 2025. The CEC has recently included the Transmission Form T-1 as part of the Electricity Resource Plans proceeding, and I understand this change has caused the deadline for submittal of information to fall at a point in the applicant’s workflow where the information is not yet available. I appreciate that the applicant wants to submit data of the highest quality and is committed to meet the requested deadline. I agree that allowing the applicant to submit the required information no later than February 14, 2025 will ensure the CEC has the most accurate and up-to-date data.

If you have any questions, please contact Robert Kennedy, at [Robert.Kennedy@energy.ca.gov](mailto:Robert.Kennedy@energy.ca.gov).

Sincerely,



Drew Bohan  
Executive Director

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<sup>4</sup> (Cal. Code Regs, tit. 20, §1342(c).)

Grace Kay

November 18, 2024

Page 3

cc: Robert Kennedy (email service only: [Robert.Kennedy@energy.ca.gov](mailto:Robert.Kennedy@energy.ca.gov))  
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