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February 3, 2011

Drew Bohan, Executive Director
Commission on State Mandates
U.S. Bank Plaza Building
980 Ninth Street, Suite 300
Sacramento, California 95814

Re: CSM 02-TC-25 and 02-TC-31
Minimum Conditions for State Aid

Dear Mr. Bohan:

On behalf of the test claimants, I am requesting an extension to respond to the January 31, 2011, Draft Staff Analysis from February 22, 2011 to April 22, 2011.

The staff analysis is 155 pages and the result of many months of Commission staff work. Our response will require the same consideration. I cannot delegate the response to the staff analysis to support staff. Until February 15, 2011, our collective efforts are dedicated to the completion of about 800 annual reimbursement claims that are each subject to a \$10,000 penalty if late-filed. I also have competing Commission workload, notably the response to the Draft Staff Analysis for 02-TC-46 that is due March 1, 2011, as well as two test claims scheduled for hearing on March 24, 2011.

Thank you for your consideration of this request.

Sincerely,



Keith B. Petersen

Submitted to the COSM Drop Box for service to listed parties.