Orig RM 2-11-02 Rejected

STATE OF CALIFORNIA GRAY DAVIS, *Governor*

PUBLIC UTILITIES COMMISSION

VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

Tel. No. (415) 703-1691

January 25, 2002

Advice Letter 2164-E

REGULATORY RELATIONS
Tariffs Section
SShaw
ASmith
NCAvendano
PStorz
STatai
TNovak
JAN 30 2002
Records

Ms Anita Smith, Rate Analyst
Pacific Gas and Electric Company
77 Beale Street, 10B Mail Code
San Francisco, CA 94177

Subject: Authorization for bridge funding of existing Low Emission Vehicle Program

Dear Ms Smith:

Advice Letter 2164-E is denied by Resolution G-3322 dated January 23, 2002. A copy of the advice letter is included herewith for your records.

Sincerely,

Kevin P. Coughlan, Chief
IMC Branch
Energy Division

RECEIVED
REGULATORY RELATIONS DEPARTMENT
JAN 29 2002

cc: Gail Slocum
Norm Stone
Sharon Tatai
Sue Shaw

jir

Lisa Lo
Gil Houston
Gaston Marcillac

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**ENERGY DIVISION** **RESOLUTION G-3322**
**January 23, 2002**

# RESOLUTION

Resolution G-3322. Pacific Gas and Electric Company (PG&E) requests authority for interim funding of its low-emission vehicle program starting January 1, 2002 and continuing through the effective date of the rates resulting from a Commission decision issued in PG&E's next General Rate Case.

Southern California Edison Company (SCE) requests authority to extend its Electric Vehicle Adjustment Clause mechanism until December 31, 2002.

Southern California Gas Company (SoCalGas) requests authority for interim funding of its low-emission vehicle program until the later of December 31, 2002, or the issuance of a final decision in its next base margin proceeding.

With modifications, the requests of PG&E, SCE, SoCalGas are granted except for PG&E Advice Letter 2164-E, which is denied.

San Diego Gas & Electric Company (SDG&E) is ordered to file an application as described in this resolution if they intend to continue their low-emission vehicle program beyond the current authorization provided in Decision 95-11-035.

By PG&E Advice Letter 2340-G filed on September 14, 2001, PG&E Advice Letter 2164-E filed on September 19, 2001, SCE Advice Letter 1558-E filed on July 6, 2001, SoCalGas Advice Letter 3022 filed on April 30, 2001.

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## SUMMARY

PG&E, SCE and SoCalGas seek to extend the current authority they received in Decision (D.) 95-11-035 to fund the acquisition of low-emission vehicles[1] (LEV) for their fleets, LEV research and development projects, public education activities and other related endeavors. Each of the utilities current authorization is set to expire on December 21, 2001.

The following table summarizes the activities and funding amounts (1992 dollars) approved in D.95-11-035 for the six year program period for each energy utility.

**Table 1**[2] (dollars in thousands)

| Utility: | PG&E (EV) | PG&E (NGV) | SDG&E (EV) | SDG&E (NGV) | SCE | SoCalGas |
|---|---|---|---|---|---|---|
| Approved Expenses: | $5,819 | $22,984 | $6,505 | $5,683 | $41,413 | $35,305 |
| Ratepayer funded expenses: | 5,819 | 22,984 | 4,456 | 5,683 | 26,223 | 35,305 |
| Approved capital costs: | 3,709 | 7,822 | 1,413 | 1,000 | 39,768 | 0 |
| Ratepayer funded capital costs: | 3,709 | 7,822 | 892 | 1,000 | 18,515 | 0 |

This resolution grants the requests of PG&E, SCE and SoCalGas, subject to modifications. These utilities may extend the duration of their LEV programs described in their advice letters as modified until the Commission acts on the applications ordered by this resolution, but no later than December 31, 2002. The level of funding permitted is limited to the most recent amount that the Commission has allowed the utilities to place into rates as authorized in D.95-11-035 or the amount requested in the advice letters, whichever is less. Furthermore, the utilities are ordered to file applications with the Commission for LEV funding requests within 60 days of the effective date of this resolution containing

[1] "Low-emission vehicle" refers to vehicles that use energy sources other than petroleum for propulsion. Natural Gas Vehicles (NGV) and Electric Vehicles (EV) are types of LEVs.

[2] "Approved expenses" and "Approved capital costs" includes any shareholder funded amounts in addition to funds to be reimbursed by ratepayers.

the information specified herein. If the applications are not submitted within 60 days, LEV funding will be terminated.

The resolution also requires SDG&E to file an application within 60 days of the effective date of this resolution if they intend to continue their LEV program beyond the current authorization provided in D. 95-11-035.

## BACKGROUND

PG&E, SCE, SoCalGas and SDG&E are currently authorized to use ratepayer funding to support their LEV programs as specified in Decision (D.)95-11-035. Under the terms of the decision, the authorization was set for a six-year period and is due to lapse on December 21, 2001.

The Commission issued D.95-11-035 in a proceeding to determine the appropriate level of utility involvement in the LEV market.[3] At the time, LEV technologies were relatively new and considered largely experimental in nature.

In the Phase I decision (D.93-07-054), the Commission reviewed various Public Utilities (PU) Code amendments addressing LEV policies and adopted the following guidelines to determine whether proposed utility LEV programs were appropriate and suitable for ratepayer funding:

1) Ratepayers will pay the reasonable costs of programs that help develop and facilitate the use of LEVs and further the goal of substantial market penetration if the utility can meet one or more of the utilities traditional responsibilities to provide reliable and efficient service, safe service, environmentally and socially responsible service, and reasonable rates.

2) To the extent they are applicable, programs must comply with statutory and Commission guidelines related to Research Development and Demonstration (RD&D) projects and Demand Side Management (DSM).

3) The utility must demonstrate that it has reviewed the programs of the motor vehicle industry, public agencies, research groups and, if

[3] Order Instituting Investigation (OII) 91-10-029/Order Instituting Rulemaking (OIR) 91-10-028.

appropriate, consulted with these entities to ensure that each program element does not unnecessarily duplicate and is complementary of programs undertaken by these entities to encourage substantial market penetration of LEVs.

4) The utility is required to demonstrate that its programs are generally consistent with the goals, policies, and objectives of California and federal legislation and agencies, and air districts and local agencies within the service territory.

5) The utility is required to demonstrate that each element of its LEV program does not unfairly compete with nonutility enterprises.

For the next phase of the proceeding, the utilities were ordered in D.93-07-054 to file applications addressing all funding requirements related to LEVs for a period of six years.

In the Phase II decision (D.95-11-035), the Commission approved those elements of each utility's LEV program proposal which met the previously adopted guidelines. Activities that were authorized consisted of these principal areas:

1) Acquisition of alternative fuel fleet vehicles pursuant to federal mandates[4].
2) RD&D projects involving such items as recharging hardware and natural gas refueling equipment.
3) Educating the public about product safety, proper equipment use and related topics.
4) Building infrastructure to support LEV use.
5) Overhead and administrative expenses.

The Commission set the maximum amount of ratepayer and shareholder funds[5] that could be spent for each program activity covering the six year period. The utilities were also required to regularly file reports with the Commission Advisory and Compliance Division containing information about LEV growth, energy consumption, RD&D accomplishments and related subjects. The decision became effective 30 days from November 21, 1995.

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[4] National Energy Policy Act of 1992 (EPAct), PL 102-486, 106 Stat. 2776.

[5] Certain infrastructure activities of SDG&E and SCE were approved subject to shareholder funding.

The Commission in D.95-11-035 also placed several conditions on the utilities' LEV activities due to the legislative sunset of two PU Code sections on December 31, 1996.[6] On that date, the Commission lost specific authority to establish special incentive tariffs, to allow natural gas utilities to construct and maintain natural gas refueling stations, to support vehicle conversion centers, and several related items. As such, the decision decreed that ratepayer funded activities in these areas would not extend past the repeal date of the relevant code section. Additionally, a PU Code section ordering the Commission to encourage energy utilities to pursue certain LEV RD&D activities was also repealed on December 31, 1996.[7]

In consideration of the statutory changes referred to above, the utilities were ordered in D.95-11-035 to terminate their ownership of any natural gas refueling stations located on customer owned property. Under the terms of the decision, the utilities were required to remove all customer-site stations constructed prior to the effective date of D.95-11-035 from ratebase when they were sold, or six years from the effective date of the decision, whichever came first. To encourage the utilities to sell these stations quickly and profitably, the Commission allowed the utilities to retain twenty-five percent of any resulting gains although they were required to absorb twenty-five percent of any losses from the station sales. The utilities would be reimbursed for operating the existing customer-site facilities until they were closed or sold, but in no event longer than the six year timeframe.

Under the edicts of D. 95-11-035, the utilities recorded their expenses in one-way balancing accounts. With this procedure, funds that had been reflected in rates but left unspent would be refunded to ratepayers, while undercollections would not be tracked. The utilities were allowed to recover the reasonable costs of their programs in rates set for the following year. Any expenditures that exceeded the authorized amounts would not be recoverable from ratepayers.

Since the aforementioned authorization is set to expire on December 21, 2001, PG&E, SCE and SoCalGas (hereafter referred to as the "utilities") filed advice

[6] PU Code sections 745 and 745.5.

[7] PU Code section 740.2.

letters (AL) seeking to continue funding for their programs on an interim basis. The utilities are requesting that the funding continue until the conclusion of their other on-going ratemaking proceedings which address general operational matters. Under this arrangement, future LEV program funding requests would be incorporated into these general ratemaking proceedings rather than treated on a stand-alone basis as is the current practice.

The utilities based the level of their requested funding on their respective spending limits authorized in D.95-11-035. In the case of PG&E and SoCalGas, the utilities annualized the authorized amount by program activity and adjusted these figures so that the requested amount of ratepayer funding is expressed in current dollars. SCE states that its funding level request is equivalent to the updated amounts set in its 1998 final Revenue Adjustment Proceeding (RAP) decision. The following summarizes the duration and level of funding the utilities have requested in the ALs:

PG&E filed two advice letters. AL 2340-G was filed on September 14, 2001 and AL 2164-E was filed on September 19, 2001. PG&E filed both ALs because they currently have both a NGV and EV program, however, the ALs are duplicative as their requests in each AL are essentially identical. In consideration of this duplication, the total annual amount of funding requested is $8.268 million. The ALs also acknowledge the Commission's directive to either sell or remove from ratebase customer site NGV stations. The utility requests funding to begin on January 1, 2002 and continue through the effective date of the rates resulting from a Commission decision issued in PG&E's next General Rate Case.

SoCalGas filed Advice Letter 3022 on April 30, 2001. SoCalGas currently has an NGV program. The total annual amount of funding requested is $5.623 million. SoCalGas is not requesting funding for operating and maintenance costs associated with public NGV refueling stations and claim they have sold and/or removed from ratebase all NGV refueling stations built on customer property pursuant to D.95-11-035. Additionally, the utility is seeking less than the currently authorized amount as expressed in current dollars for overhead and some indirect costs. The utility seeks interim funding until the later of December 31, 2002, or the issuance of a final decision in their next base margin proceeding.

SCE filed Advice Letter 1558-E on July 6, 2001. SCE currently has an EV program. SCE is seeking to extend its program by requesting the continued operation of its Electric Vehicle Adjustment Clause (EVAC) until December 31, 2002. The EVAC serves as the balancing account mechanism to track its LEV program expenses.

The utility says it has spent approximately 55 percent of $44.7 million (in 1992 dollars) authorized in D.95-11-035 and, therefore, does not require additional funding. SCE claims that this extension is necessary due to a delay of SCE's General Rate Case as provided in D. 01-06-039. Additionally, SCE recommends that costs incurred in 2002 continue to be reviewed for reasonableness in its RAP proceeding.

SDG&E currently has an EV and NGV program. To date, the utility has not filed an advice letter seeking continuation of its ratepayer funded LEV program.

In their advice letters, the utilities stipulate that continued funding is necessary because of two basic reasons. First, the utilities say they are still subject to government mandates requiring that a portion of their fleet purchases must consist of alternative fuel vehicles. Related to these requirements is the need for funding to ensure that adequate facilities and equipment are in place to support an increased number of LEVs in their fleets. Second, PG&E and SoCalGas claim that they continue to provide an important public service. Both utilities explain that they serve as the primary source of information on a variety of topics such as product safety and LEV performance characteristics. Additionally, these utilities offer training on safe vehicle refueling practices and proper equipment use. The utilities also propose to continue their ratepayer funded RD&D activities and seek reimbursement of their overhead and administrative expenses as well. SCE's EVAC specifies that the utility may engage in similar activities.

Furthermore, PG&E and SoCalGas indicate that they will be impacted by an increase in LEV use resulting from the recent and expected regulatory actions of local air districts. As these agencies require more entities to acquire LEVs, the utilities believe they will be increasingly called upon to provide the public with information and conduct other educational activities. For example, SoCalGas notes that LEV use will grow due to rules promulgated by the South Coast Air Quality Management District (SCAQMD) requiring the use of NGV's for the fleets of some public and private organizations. PG&E explains that clean air districts in Northern California are considering adopting regulations similar to SCAQMD's .

## NOTICE

Notice of PG&E AL 2164-E, PG&E AL 2340-G, SCE AL 1558-E, SoCalGas AL 3022AL was made by publication in the Commission's Daily Calendar. PG&E AL 2164-E, PG&E AL 2340-G, SCE AL 1558-E and SoCalGas AL 3022 state that a copy of the ALs were served on the service list of OII 91-10-029/OIR 91-10-028 and mailed and distributed in accordance with Section III-G of General Order 96-A.

## PROTESTS

PG&E AL 2164-E, PG&E AL 2340-G, SoCalGas AL 3022-G and SCE AL 1558-E were not protested.

## DISCUSSION

We are presented with the question of whether to extend funding of the LEV programs of PG&E, SCE and SoCalGas beyond the six year term we established in D.95-11-035 or not. As further explained below, the issues raised by the ALs not only involve the merits of continuing the programs, but touch upon procedural matters as well. We are also obligated to act in a manner that protects the interest of each of the utilities' ratepayers.

Our review of the ALs indicate that the utilities will continue their LEV programs according to the criteria we established in OII 91-10-029/OIR 91-10-028. Both PG&E and SoCalGas state that they would "retain all aspects and mechanisms of the currently authorized" LEV programs and "will continue to provide the services mandated by the CPUC. " SCE says that its "LEV programs and activities currently reflected in the EVAC balancing account meet traditional utility activity guidelines for providing safe, reliable, and efficient service to ratepayers."

We note that each utility has provided some justification for continuing their programs. For example, the utilities assert that they must continue to meet government mandates requiring them to obtain increasingly greater numbers of alternative fuel vehicles for their fleets. These vehicle purchases will necessitate that the utilities maintain adequate equipment and infrastructure to support the growing proportion of LEVs in their fleets. In the area of public education, PG&E and SoCalGas claim they are the primary source of information regarding the safe and efficient operation of LEVs as well as on other issues.

While the foregoing discussion suggests that the utilities will continue their LEV programs in a manner consistent with our LEV guidelines, the ALs do not provide sufficient detail for us to definitively determine if ratepayer interests will be adequately protected if the ALs are approved unconditionally. We believe that the utilities must further substantiate the representations made in their ALs and thoroughly explain how ratepayers will be served by the continuation of their programs.

We also note that our intent at the time we issued the current authorization was to fund the utilities' programs for a set period of time with the expectation that at some point further subsidization of the LEV market by utility ratepayers would not be warranted. As stated in Findings of Fact No. 3 in D.93-07-054; "It is not clear how long a utility presence is needed to provide the bridge to a sustainable competitive market for LEVs." A further demonstration of our intent was expressed in D. 98-12-098 (see page 3, mimeo), a decision denying an application for rehearing of D. 95-11-035, wherein we said the following while discussing the legislative sunset of various PU Code sections; "The above discussion clearly indicates that the Legislature and the Commission intended funding for these essentially experimental programs for a specific six-year period, not an open-ended one." Other than a statement by SoCalGas indicating that a self-sustaining market for NGVs has materialized to a significant extent, the ALs do not provide any showing to determine whether utility involvement concerning LEVs is either no longer necessary or should diminish. We continue to maintain that as the LEV market matures some activities the utilities are currently engaged in may be more appropriately done by other entities or without the need for further ratepayer subsidies.

In consideration of the issues raised above, we believe that the appropriate venue to address the utilities' request is through a formal application. The utilities are basically attempting to modify D.95-11-035 by seeking to extend the six year termination date set in the decision and alter the previously adopted funding amounts. Additionally, as we have highlighted above, the issues raised by the ALs must be thoroughly reviewed especially since the requested funding levels are significant amounts.

We recognize, however, that dismissing the ALs may be unduly disruptive and, if the utility ceases to perform some functions, possibly result in ratepayer harm. We note that the utilities are subject to federal mandates requiring that they obtain alternative fuel use vehicles for their fleets. In general, it is appropriate for the utility to be reimbursed for costs incurred in obtaining equipment including fleet vehicles necessary for the provision of their utility services. As such, it would not be prudent to end funding authorization for the cost of these non-discretionary activities. Additionally, other activities, although not subject to a specific government requirement, at first glance appear to serve an important function and probably should continue to be provided, particularly those related to LEV safety.

With the caveats stated herein, we believe the utilities have provided a sufficient showing and except for PG&E AL 2164-E, approve the ALs subject to the following modifications and additional requirements we adopt herein. First, we will allow the utilities to begin the program activities described in the ALs today and to continue until the applications referred to below are acted upon, but no later than December 31, 2002. Second, we will limit the level of LEV funding up to the most recent amount the Commission authorized the utilities place into their rates pursuant to D.95-11-035 or the amount requested in their ALs, whichever is less. Third, we will require PG&E, SCE, SoCalGas and SDG&E to file applications with us no later than 60 days following the effective date of this resolution with the information specified below.

We deny PG&E's AL 2164-E because it duplicates the requested LEV funding filed in PG&E AL 2340-G.

The conditions we have placed on the utilities are reasonable given the limited information we have before us to judge the merits of continuing the LEV programs. Setting parameters on funding levels and the duration of the program will adequately protect the interests of the utilities' ratepayers while the applications are reviewed.

Our reason for ordering SDG&E to file an application in this resolution is to ensure that the continuation of all the energy utilities LEV programs undergo the same scrutiny and analysis. Such a comprehensive review is consistent with the methodical approach we used in establishing the authorization in D. 95-11-035. We will relieve SDG&E from this requirement if they have decided not to continue their LEV activities beyond the authorization in D.95-11-035.

The applications will address LEV program activities and requests for funding beyond the six year term set in D.95-11-035 and shall include, but not be limited to the following information:

1. A detailed description of proposed LEV program activities including those presented in the ALs with information showing how the LEV guidelines and criteria adopted in OII 91-10-029/OIR 91-10-028 will be met. Identify any

activities that were approved subject to shareholder funding in D.95-11-035. Include the amount of funding requested as well as ratemaking proposals.

2. For PG&E and SoCalGas, describe how the requested amounts in the ALs were adjusted to reflect current dollars, including what indices or data were used to update the figures expressed in D.95-11-035.

3. A report describing the accomplishments achieved by the LEV program over the six year authorization as specified in D.95-11-035 and efforts to help develop and facilitate the use of LEVs and further the goal of substantial market penetration of LEVs. Include an assessment of the degree to which the LEV market is self-sustaining as well as proposed criteria the Commission can use to determine when or if ratepayer subsidization of utility LEV activities should be reduced, eliminated or otherwise modified.

4. Submit copies of the reports required by Ordering Paragraph 3 in D. 95-11-035.

5. Include or reference specific regulations imposed or proposed by federal, state, air district and, any other government agencies that either require utilities to purchase LEVs for their fleets, or will increase LEV use by the public or other entities.

6. A report describing efforts made to comply with the requirements of D.95-11-035 concerning the disposition of customer-site natural gas refueling stations.

7. An explanation of whether future LEV funding requests should continue to be presented to the Commission on a stand-alone basis or included in other proceedings, and of what type of showing should be made in any future LEV funding requests to ensure that the interests of ratepayers are served.

8. A description of efforts made to determine what public education, safety training and related activities are being undertaken by government agencies, vehicle and equipment manufactures, air districts and other entities.

9. A summary of the year-to-year activity of the balancing account established in D. 95-11-035 showing expenses, revenues and amounts placed into rates or refunded to ratepayers for the six year period. Include a description of any

reasonableness reviews conducted by the Commission concerning the LEV balancing account.

10. An explanation of the extent that the competitive market is satisfactorily conducting LEV RD&D activities and how the repeal of PU Code section 740.2 affects future utility involvement in LEV RD&D ventures. Also, describe how the enactment of the natural gas surcharge in 2001 (see PU Code sections 890 through 900) may effect the source of funding for LEV RD&D projects.

11. A description of any requests for funding of LEV activities authorized by D.95-11-035 or any other LEV related activities that have been included in proceedings or filings before the Commission in addition to the ALs addressed in this resolution.

While the applications are pending, the utilities will conduct their LEV operations as described in the ALs as modified as well as subject to the conditions and terms set in OII 91-10-029/OIR 91-10-028 including the balancing account treatment. If it is determined that, when the applications are acted upon, some aspects of the utilities programs conducted pursuant to the ALs should not be funded with ratepayer money, we will exclude those amounts from future rates.

We believe the more deliberative decision making aspects associated with the application process coupled with the information we request above will enable us to decide with prudence whether and to what extent ratepayers should continue to fund utility LEV programs.

In the event the utilities do not submit the applications within 60 days, the LEV funding authorized by this resolution will be immediately terminated.

## COMMENTS

Public necessity requires that the 30-day comment period of Public Utilities Code section 311(g) be reduced in order for the authorization provided for in D.95-11-035 allowing the utilities to maintain LEV programs does not lapse. We have balanced the public interest in avoiding the possible harm to public welfare flowing from delay in considering this resolution against the public interest in having the full 30-day period for review and comment as required by Rule 77.7(f)(9). We conclude the former outweighs the latter. We conclude that failure to adopt a decision before the expiration of the 30-day review and comment period would cause significant harm to the public welfare. Accordingly we reduce the comment period for this Resolution.

Comments were filed by PG&E, SCE and jointly by SoCalGas and SDG&E (SoCalGas/SDG&E) on November 29, 2001.

In general, each party filing comments support the draft resolution and recommend its adoption. Additionally, the parties request several changes and seek clarification on some points. We provide our response to each issue raised and incorporated those items we agree on in the resolution.

All parties submitting comments seek to extend the deadline for filing the applications ordered by this resolution for at least an additional 30 days. SoCalGas/SDG&E also suggest an alternative by maintaining the 60 day deadline, but allowing applicants to supplement their filings as additional required information becomes available. The parties reason that more time is needed to prepare their applications because of the extensive amount of information we require the utilities to provide.

In light of the December 31, 2002 termination date established in this resolution, we believe maintaining the 60 day application filing deadline is appropriate. Further, we note that some of the material we are requesting should be readily available to the utilities. The extent that the applications may be supplemented after they are filed is left to the discretion of the assigned Administrative Law Judge in accordance with the provisions set forth in the Commission's Rules of Practice and Procedure.

PG&E and SoCalGas/SDG&E recommend eliminating the June 30, 2003 deadline for the interim authority the utilities are provided to continue their LEV programs while their applications are pending. Rather than set a specific termination date, these utilities request that the interim authority remain in effect until their applications are acted upon. As an alternative, PG&E also suggests that, at a minimum, the deadline be consistent with the provisions of Senate Bill (SB) 960. Under SB 960, the Commission is charged with deciding ratemaking applications in 18 months following their filing date. The utilities argue that additional time is necessary to avoid or minimize the potential that the interim authority may lapse while the applications are still under consideration.

We believe extending the interim authority until December 31, 2002 is proper.

PG&E requests clarification concerning the scope of the applications, rate treatment of LEV expenses incurred during the interim period, and the level of funding approved under the resolution.

We provide the following explanations in order to clarify the issues raised by PG&E:

1) The applications the utilities are required to file should not only address the interim authorization granted in this resolution, but any LEV program funding they seek beyond this period as well. As we explained above, the utilities are required to provide a detailed description of their LEV activities including those conducted pursuant to the ALs as well as longer-term proposals. All outstanding LEV related requests the utilities may have filed in other proceedings should be so identified and addressed in the applications ordered in this resolution. The manner in which future LEV program requests should be presented to the Commission and their evaluation are topics for consideration in the required applications.

2) Utilities will not be allowed to place into rates any amounts for activities conducted during the interim period deemed not to be in the interests of ratepayers and failing to meet the guidelines adopted in OII 91-10-029/OIR 91-10-028.

3) The maximum level of funding applying during the interim period is the amount the Commission most recently authorized the utility to place into their rates, as of the effective date of the resolution, or the amount requested in their advice letter, whichever is less. The utilities do not specifically request authority in their ALs to escalate funding levels to current year dollars beyond year 2001 and we will not make such a provision to do so here.

SoCalGas notes that it overstated the amount of the funding it requested in its advice letter by $69,000. The correction was presented in the utility's response to an Energy Division data request. Accordingly, we will reduce the amount requested in the advice letter to a total of $5.554 million, as reflected in SoCalGas' response to Energy Division data request No.1, entitled "ATTACHMENT B (revised)."

SCE notes that conditioning the level of funding during the interim period by the amount the utility has been allowed to place into rates is not applicable for their situation. The utility claims this is proper because they did not identify an amount in their AL different from the most recent Commission adopted level of funding. Although this may be the case, we will keep this condition in place for each utility consistent with our objective to protect ratepayers.

As information, SoCalGas/SDG&E state that SDG&E has not requested LEV bridge funding because the utility believes it received authority in D.98-12-038 to recover its LEV expenses in base margin through their next base margin case. However, SDG&E intends to file the application ordered in this resolution to describe the nature of its current LEV authorization and present its intentions for future funding. Further, SoCalGas expressed its intent to include a specific LEV expense request in its Test Year 2004 PBR/base margin application due December 21, 2002.

Reply comments were filed by SCE on December 5, 2001. SCE concurs with the comments of the other parties that the termination date set for the interim authority be eliminated. Additionally, SCE describes its intentions for presenting LEV funding requests for 2003 and beyond. As we discuss in this resolution, the manner in which the utilities will submit future LEV requests will be addressed in the applications ordered herein.

## FINDINGS

1. PG&E filed AL 2340-G on September 14, 2001 requesting authorization for funding of its LEV program in the amount of $8.268 million annually, beginning January 1, 2002 and continuing through the effective date of the rates resulting from a Commission decision issued in PG&E's next General Rate Case.
2. PG&E filed AL 2164-E on September 19, 2001 requesting authorization for funding of its LEV program in the amount of $8.268 million annually, beginning January 1, 2002 and continuing through the effective date of the rates resulting from a Commission decision issued in PG&E's next General Rate Case.
3. PG&E AL 2164-E contains the same requested LEV funding filed in PG&E AL 2340-G.
4. SCE filed AL 1558-E on July 6, 2001 requesting an extension of its EVAC mechanism for one year until December 31, 2002.
5. SoCalGas filed AL 3022 on April 30, 2001 requesting authorization to continue funding of its LEV program in the amount of $5.623 million

annually until the later of December 31, 2002, or the issuance of a final decision in SoCalGas' next base margin proceeding.

6. Energy utilities must comply with federal mandates requiring that a certain proportion of fleet vehicle purchases must consist of alternative fuel vehicles.
7. PG&E, SCE and SoCalGas indicate they will continue their LEV programs in accordance with current Commission authorizations.
8. It is reasonable to require PG&E, SCE, SoCalGas to file applications to continue funding of LEV programs.
9. It is reasonable to require SDG&E to file an application if they intend to continue their LEV program beyond the authorization in D. 95-11-035.
10. It is reasonable to evaluate the utilities' requests to continue their LEV activities with ratepayer funds with the guidelines adopted in OII 91-10-029/OIR 91-10-028.
11. It is reasonable to limit the amount of funding the utilities are seeking in their ALs and to terminate the LEV programs conducted under the ALs when the Commission acts on their applications or December 31, 2002, whichever occurs first.
12. A failure to adopt a decision before the expiration day of the 30-day review and comment period may cause a significant harm to the public welfare and therefore the comment period is reduced.

**THEREFORE IT IS ORDERED THAT:**

1. The request of PG&E in Advice Letter 2340-G is granted subject to the following modifications. PG&E shall continue their LEV programs as described in their advice letter beginning today and continuing until the Commission issues a decision on the applications required in Ordering Paragraph 6, but no later than December 31, 2002. The maximum amount of funding PG&E may spend on its LEV program is limited to the amount of LEV funding the Commission most recently, as of the effective date of this resolution, authorized the utility to place into rates pursuant to D.95-11-035 or the amount requested in its advice letter, whichever is less.
2. The request of PG&E in Advice Letter 2164-E is denied.
3. The request of SCE in Advice Letter 1558-E is granted subject to the following modifications. SCE shall continue their LEV programs as described in their advice letter beginning today and continuing until the Commission issues a decision on the applications required in Ordering Paragraph 6, but no later than December 31, 2002. The maximum amount of funding SCE may spend on its LEV program is limited to the amount of LEV funding the Commission

most recently, as of the effective date of this resolution, authorized the utility to place into rates pursuant to D.95-11-035 or the amount requested in its advice letter, whichever is less.

4. The request of SoCalGas in Advice Letter 3022 is granted subject to the following modifications. SoCalGas shall continue their LEV programs as described in their advice letter beginning today and continuing until the Commission issues a decision on the applications required in Ordering Paragraph 6, but no later than December 31, 2002. The maximum amount of funding SoCalGas may spend on its LEV program is limited to the amount of LEV funding the Commission most recently, as of the effective date of this resolution, authorized the utility to place into rates pursuant to D.95-11-035 or the amount requested in its advice letter as corrected in ATTACHMENT B (revised), whichever is less.
5. In addition to the requirements set forth herein, PG&E, SCE and SoCalGas shall continue their LEV programs in accordance with all applicable conditions adopted in OII 91-10-029/OIR 91-10-028, including balancing account treatment of LEV expenses.
6. PG&E, SCE, and SoCalGas are ordered to file applications within 60 days of the effective date of this resolution with the information specified in this resolution.
7. SDG&E is ordered to file an application within 60 days of the effective date of this resolution with the information specified in this resolution if they intend to continue their LEV program beyond the authorization provided in D. 95-11-035.
8. The utilities shall serve copies of their applications referred in OP 6 and OP 7 on the parties included on the service list of OII 91-10-029/OIR 91-10-028.
9. PG&E, SCE, and SoCalGas shall file advice letters to amend any current tariff provisions to reflect the authorization granted herein within 10 days of the effective date of this resolution. The advice letters shall be effective today, contingent upon review by the Energy Division.
10. PG&E, SCE and SoCalGas are ordered to terminate their LEV programs if they do not comply with OP 6.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on January 23, 2002, the following Commissioners voting favorably thereon:

Wesley Franklin

WESLEY M. FRANKLIN
Executive Director

LORETTA M. LYNCH
President
HENRY M. DUQUE
RICHARD A. BILAS
CARL W. WOOD
GEOFFREY F. BROWN
Commissioners

**Pacific Gas and Electric Company**

77 Beale Street
P.O. Box 770000
San Francisco, CA 94177
415/973-7000

"REJECTED"

FILED
SEP 1 9 2001
PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA

PG&E

# ADVICE LETTER SUMMARY SHEET

**ELECTRIC ADVICE LETTER 2164-E**

DATE FILED: (TO BE ENTERED BY CPUC)

DESCRIPTION OF TARIFF CHANGES REQUESTED:

**Authorization for Bridge Funding of PG&E's Existing Low Emission Vehicle (LEV) Program**

REQUESTED EFFECTIVE DATE:

**October 24, 2001**

REJECTED

Pacific Gas and Electric Company

**DeAnn Hapner**
Vice President of
Regulatory Relations

77 Beale Street
San Francisco, CA 94105

*Mailing Address*
Mail Code B10A
P.O. Box 770000
San Francisco, CA 94177

415.972.5209

September 19, 2001

**ADVICE 2164-E**
(Pacific Gas and Electric Company ID U39 E)

**Subject:** **Authorization for Bridge Funding of PG&E's Existing Low Emission Vehicle (LEV) Program**[1]

Public Utilities Commission of the State of California

## Purpose

Pacific Gas and Electric Company (PG&E) is hereby seeking authorization for bridge funding of its current Low Emission Vehicle (LEV) program, starting January 1, 2002, and continuing through the effective date of the rates resulting from a Commission decision issued in PG&E's next General Rate Case.[2]

## Background

The Commission originally authorized PG&E's LEV program in Decision (D.) 91-07-018. Key CPUC decisions of record include:

- D. 91-07-018 authorized PG&E revenues of up to $12.485 million over a two-year period to provide for, among other things, the installation of utility and customer natural gas vehicle (NGV) refueling stations and the development of natural gas (CNG) technology for commercialization. This authorization expired December 31, 1993.

- D. 92-12-057 and D. 93-10-073 authorized $6.242 million for continuation of the NGV Pilot program until a decision was reached in Phase II of the LEV program.

[1] This electric filing corresponds to Advice 2340-G, Authorization for Bridge Funding of PG&E's ExistingLow Emission Vehicle (LEV) Program, which was filed on September 14, 2001.

[2] PG&E reserves all legal rights to challenge the decisions or statutes under which it has been required to make this advice filing, and nothing in this advice filing constitutes a waiver of such rights. Also, PG&E reserves any additional legal rights to challenge the requirement to make this advice filing by reason of its status as a debtor under Chapter 11 of the Bankruptcy Code, and nothing in this advice filing constitutes a waiver of such rights.

- D. 92-12-057 and D. 93-10-073 authorized $6.242 million for continuation of the NGV Pilot program until a decision was reached in Phase II of the LEV program.

- D. 95-11-035 (Phase II) authorized $40.344 million for a 6-year LEV program to expire on December 31, 2001.

PG&E intends to seek authorization for recovery of LEV program expenses as part of its next General Rate Case proceeding.

**Continuation of Funding**

PG&E requests authorization to continue to expend up to $8.268 million annually of balancing account funding, a level consistent with that already authorized by the existing LEV Program on an annualized basis. The program would retain all aspects and mechanisms of the currently authorized PG&E's LEV program, and will continue to provide the services mandated by the CPUC in D. 95-11-035, including:

- Funding the incremental cost of purchasing natural gas vehicles for PG&E's fleet, in accordance with federal and local regulations,

- Construction, operation and maintenance of PG&E-owned natural gas fueling stations,

- Customer education regarding the safe and efficient use of natural gas vehicles, and

- Research, development, and demonstration activities to support these initiatives.

Attachment I to this filing provides a summary of the annual program expenses requested for continuation of the bridge funding period, as previously authorized by the Commission.

**LEV Program**

In 1995, the Commission approved a LEV Program with the goal of establishing a self-sustaining market for natural gas vehicles (NGVs) in PG&E's service territory. Bridge funding of the existing LEV Program will address the following challenges:

- **Ensuring the safe use of light-, medium-, and heavy-duty natural gas vehicles.** PG&E's Customer Information and Education program will help ensure that customers use NGVs in a safe and efficient manner. This is particularly important as air districts in Northern California consider public and private fleet rules for light-, medium-, and heavy-duty vehicles similar to those already adopted by the South Coast Air Quality Management District (SCAQMD). The recently adopted SCAQMD Fleet Rules are designed to significantly reduce mobile emissions and reduce health risks associated with diesel emissions by requiring the purchase of natural gas vehicles for fleets sponsored by local governments, schools, refuse collectors, and other entities.

- **Ensuring continued customer information about LEVs and their safe use.** PG&E, as the local gas utility, remains the primary source of information regarding electric vehicles (EV) and NGVs for prospective fleet customers. While there are other sources for EV and NGV information (e.g., OEMs (Original Equipment Manufactures), fuel providers, equipment suppliers, etc.), PG&E is a recognized leader in the EV and NGV industries, and a valued resource for customers considering natural gas and electric vehicle options. PG&E is ensuring that previous investment in NGV and EV expertise is made available to new customers. PG&E cooperates with other entities to deliver timely and accurate information in the following general areas: product, infrastructure, economics, emissions, funding, safety, and local/state/federal rules and regulations.

  Categories of information sought by existing and prospective customers in each area include:

| | |
|---|---|
| **Product** | Technology related information including, but not limited to: vehicle/chassis availability, engine availability and performance (e.g., horsepower, torque, fuel economy, range, durability, reliability, etc.), re-power options, engine upgrades, vehicle/engine differential price, fuel capacity, costs of equipment options, location of fuel tanks safety equipment and issues (e.g., sensors, shut-off valves, training), dual-fuel versus bi-fuel versus dedicated vehicle considerations, conversions versus OEM product, new product, and OEM plans for new releases. |
| **Infrastructure** | Information related to EV charging and NGV compressor stations, including, but not limited to: NGV station design, evaluation, and performance; EV charger installation; NGV station site specific concerns (fleet size, fueling window, system costs, permits, public access, maintenance facility upgrades, safety systems, weights and measures issues, fuel specifications, fuel card access, etc.), fuel network compatibility; inductive versus conductive charging; codes and standards. |
| **Economics** | Information related to electric and natural gas pricing (past, present, and forecasted); on-peak versus off-peak rates; station ownership versus third-party turn-key operations; pricing options. |
| **PG&E Account Setup** | Information and support activities related to existing PG&E NGV and EV fueling/station rates to include: rate option discussion, rate-contract account setup, station fueling card(s) distribution, fueling tax processing. |

| | |
|---|---|
| **Emissions** | Information related to EV and NGV emissions performance, including: emissions test results of specific products; in-use performance, diesel and gasoline emissions: durability; warranties; remote versus in-situ performance; emissions trading; grant specific economic competitiveness calculations ($/ton emissions reduced). |
| **Funding** | Identify specific funding sources and funding available to offset incremental costs of EVs and NGVs and to support the construction of infrastructure (e.g., incentives, grants, matching funds, tax deductions/credits, etc.). Provide assistance in the preparation of incentive applications and grant requests. |
| **Safety** | Information for a wide range of safety related issues, to include: safe operation of EVs and NGVs; EV and NGV safety equipment (etc. pressure relief devices; emergency shut-off devices, etc.), cylinder inspection training; fueling and charging safety training; first responder safety training; |
| **Regulatory Requirements** | Training and workshops to enable fleet operators to become familiar with existing and expected regulatory requirements affecting their fleets, including: CARB fleet rules; HOV lane access requirements; fueling station standards; and fuel specifications. |

- **Ensuring continued compliance with all LEV-related regulatory mandates.** PG&E's fleet also must respond to federal Environment Protection Agency requirements and other regulatory mandates, and potentially, future fleet rules introduced by local air districts, which will require the accelerated purchase of dedicated light-duty, medium-duty, and heavy-duty natural gas vehicles and/or electric vehicles. These purchases will require logistical support and continued funding of vehicle incremental costs.

- **Ensuring adequate infrastructure for PG&E's LEV fleet.** PG&E's electric vehicle charging network and natural gas fueling infrastructure will need to be expanded to accommodate mandated vehicle purchases. An expanding fleet charging network and CNG fueling infrastructure will necessitate an appropriate operation and maintenance budget to ensure safe and reliable performance of all fueling facilities.

- **Ensuring continued NGV fueling safety training.** Increasingly, fleets and private individuals utilizing NGVs are choosing to use PG&E fueling facilities for their fueling needs. PG&E believes that it is essential to continue providing fueling safety training to natural gas vehicle owners. Fleet managers and individual customers are provided with hands-on training on how to operate PG&E's fueling facilities safely. They are also given instructions regarding emergency procedures. PG&E works with other natural gas fuel providers to ensure they provide similar safety training.

Bridge funding for PG&E's LEV program will ensure that these services and operations will continue to be provided to customers.

## Protests

Anyone wishing to protest this filing may do so in writing, sent via U.S. mail or facsimile, by **October 9, 2001**, which is 20 days from the date of this filing. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. Protests should be mailed to:

IMC Branch
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, Room 4002
San Francisco, California 94102
Facsimile: (415) 703-2200

Copies should also be mailed to the attention of the Director, Energy Division, Room 4005 and Jerry Royer, Energy Division, at the address shown above. It is also requested that a copy of the protest be sent via electronic mail and facsimile to PG&E on the same date it is mailed or delivered to the Commission the addresses shown below.

Pacific Gas and Electric Company
Attention: Les Guliasi
Director, Regulatory Relations
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-7226

## Effective Date

PG&E requests that this advice filing become effective on regular notice, **October 29, 2001**, which is less than regular notice.

## Notice

In accordance with G.O. 96-A, Section III, Paragraph G, PG&E is electronically and postal mailing copies of this advice letter to the utilities and interested parties shown on the attached list and to the parties listed in I.91-10-029, R. 91-10-028, and A. 97-12-020. Address change requests should be directed to Nelia Avendano at (415) 973-3529. Advice letter filings can also be accessed electronically at:

http://www.pge.com/customer_services/business/tariffs/

DeAnn Hapner/SKT
Vice President, Regulatory Relations

Attachments

Service Lists – I. 91-10-028, R. 91-20-028, A. 97-12-020

# CALIFORNIA PUBLIC UTILITIES COMMISSION

*PROPOSAL/ADVICE LETTER SUMMARY*

COMPANY NAME: **PACIFIC GAS AND ELECTRIC COMPANY**

TYPE OF UTILITY*:

☐ LEC ☐ IEC ☐ CER ☐ CEC ☐ RTU
☐ WTA ☐ WTB ☐ WTC ☐ WTD ☐ SWR
☐ GAS ☐ STM ☒ ELC ☐ PLC

CPUC CORP. ID: U39E

CONTACT PERSON:

Name Sharon K. Tatai

Phone Number (415) 973-2788

*EXPLANATION OF TYPE OF UTILITY:

| | |
|---|---|
| LEC = Local Exchange Carrier | WTC = Water class C |
| IEC = Interexchange Carrier | WTD = Water class D |
| CER = Cellular Resellers Only | SWR = Sewer |
| CEC = Cellular Carriers (wholesale/retail) | GAS = Gas |
| RTU = Radio Telephone Utilities | STM = Steam |
| WTA = Water class A | ELC = Electric |
| WTB = Water class B | PLC = Pipeline carrier |

DATE FILED/RECEIVED
*(stamp by CPUC)*

Please fill in ALL information

Is this a PROPOSAL or ADVICE LETTER? (Informational)

Your filing Number: 2164-E

☐ ☒ → If Proposal previously submitted, its number: ____

Documents Authorizing this filing? ____

(Decision Number, Resolution Number, Legislation, etc.)

Effective Date Requested: 10/24/2001 Estimated annual effect on: $ -- (Revenue) $ -- (Cost)

Number of Tariff Sheets: none

Tariff Schedules affected (list): none

Subject of filing: Authorization for Bridge Funding of PG&E's Existing Low Emission Vehicle (LEV) Program

KEYWORDS identifying subject matter (choose from CPUC listing)

GAS VEHICLES

BALANCING ACCOUNT

FOR CPUC OFFICE USE ONLY

Pacific Gas and Electric Company proposes that bridge funding for the LEV Program be approved by levels equal to the average annual authorization level for the LEV Program. Proposed funding is requested for the following categories:

| **Program Category** | **6-Year Authorization (Year-2000 Million$)** <br> **(D.95-11-035)** <br> (Year 2000$) | **Average Annual Authorization (Year-2000 Million$)** <br> (Year 2000$) | **Average Annual Authorization (Year-2001 Million$)** <br> (Year 2001$) | **Proposed Annual Bridge Funding Budget (Year-2001 Million$)** <br> (Year 2001$) |
|---|---|---|---|---|
| Utility Fleet Program: Mandated Vehicle Purchases (Differential or conversion costs for EVs and NGVs) | $9.636 | $1.600 | $1.655 | $1.655 |
| Fueling and Charging Infrastructure | $3.664 | $0.610 | $0.631 | $0.631 |
| Operation and Maintenance of Company Fleet Facilities | $11.526 | $1.920 | $1.983 | $1.983 |
| Education Services for Fleet Operators/General Public (includes safety training, technical and rate account support) | $10.423 | $1.730 | $1.787 | $1.787 |
| Technology Application Assessments/NGV Research, Development, and Demonstration | $12.868 | $2.140 | $2.212 | $2.212 |
| **TOTAL:** | **$48.117** | **$8.000** | **$8.268** | **$8.268** |

* All PG&E NGV stations built on customer property to be sold and/or removed from ratebase per CPUC directive by December 31, 2001.

# ELECTRIC ADVICE FILING MAILING LIST
## PER SECTION III(G) OF GENERAL ORDER NO. 96-A

E

3[illegible]S/CEOEA *
ACN Energy, Inc *
AES Company *
Agland Energy Services *
Aglet Consumer Alliance *
Agnews Developmental Center
Alcantar & Elsesser *
Anderson Donovan & Poole P.C.
Applied Power Technologies *
APS Energy Services Co Inc *
Arter & Hadden LLP *
Audit Source Inc
Avista Corp
B&K Assoc
Barkovich & Yap *
BART
Bartle Wells Associates
BETA Consulting
Bohannon Development Co
Brady & Berliner
Braun & Associates *
Brent Friedenberg Associates *
C & H Sugar Co
C[illegible]ater Service Group
Ca[illegible] Bldg Ind Assoc
Calif Cotton Ginners Assoc
Calif League of Food Processors *
California Energy Commission *
California Farm Bureau Federation
California ISO *
California Power Exchange Con *
California Water Service Group *
Call Co *
Calpine *
Calpine c*Power *
Calpine Corp
Calpine Gilroy Cogen
Cambridge Energy Research Assoc *
CanAm Energy
Cardinal Cogen
Cellnet Data Systems *
City of Glendale
City of Healdsburg *
City of Redding *
City of San Jose
City of Ukiah
CLECA Law Office
[illegible]lete Energy Svc *
CPUC
Creative Technology
Crossborder Services
CSC Energy Services *
David A. Childress
Davis Energy Group
Davis, Wright, Tremaine, LLP *
Defense Fuel Support Center
Department of the Army *
Department of Water & Power City *
Dept of the Air Force
Destec Energy, Inc *
DGS Natural Gas Services *
Dixie Group, Inc
DMM Customer Services
Downey, Brand, Seymour & Rohwer
Duke Energy *
Duncan, Virgil E
Dynegy Inc. *
Elder, Katie *
Ellison Schneider *
Energy Law Group LLP *
Energy Solutions *
Enron Energy Services
Enron Energy Svc *
Environmental Marketing Group
Exeter Associates *
Foster, Wheeler, Martinez
Franciscan Mobile Home Park *
Franciscan Mobilehome
Future Resources Associates, Inc
General Electric Co *
Goodin, MacBride, Squeri, *
Grueneich Resource Advocates *
Heeg, Peggy A.
Henwood Energy Service, Inc
HMH Resource Inc
Hogan Manufacturing, Inc
House, Lon, Phd
Imperial Irrigation District
Integrated Utility Consulting Group *
International Power Technology *
Interstate Gas Services, Inc *
J. R. Wood, Inc *
Jenkins, Larsen & Assoc
Jones, Day, Reavis & Pogue
JTM, Inc
Kaiser Cement Corp
Karkorian, Paul
Korea Elec Power Corp
Kuhn & Kuhn *
LeBoeuf, Lamb, Green & MacRae
Marcus, David
Masonite Corporation *
Matthew V. Brady & Associates *
Maynor, Donald H.
McKenzie & Assoc
Meek, Daniel W.
Meyer, Joseph
Mirant California, LLC
Modesto Irrigation Dist *
Morrison & Foerster
Morse Richard Weisenmiller
New Energy Ventures *
New United Motor Mfg, Inc
New West Energy *
Norris & Wong Associates *
North Coast Solar Resources
O'Rourke & Company
Office of Energy Assessments
PG&E National Energy Group *
Plurimi, inc *
PowerSpring Inc. *
Prax Air, Inc *
Premier Utility Consultants
Price, Roy
Product Development Dept *
Provost Pritchard
R. M. Hairston & Company
R. W. Beck & Associates *
Recon Research *
Resource Management International Inc. *
RMC Lonestar
Sacramento Municipal Utility District *
San Diego Gas & Electric *
SCD Energy Solutions *
Seattle City Light *
Sempra *
Sempra Energy *
Sempra Energy Solutions *
Sequoia Union HS Dist
SESCO
Sierra Pacific Power Co *
Silicon Valley Power *
Simpson Paper Co
Sithe Energies, Inc
Smurfit Stone Container Corp *
SoCal Edison *
Southern California Edison *
SPURR *
St Paul Assoc
Stanford University
Sutherland, Asbill & Brennan
Tabors Caramanis & Associates
Tansev and Associates

*RECEIVE ADVICE LETTERS VIA E-MAIL

7/27/2001

# ELECTRIC ADVICE FILING MAILING LIST
## PER SECTION III(G) OF GENERAL ORDER NO. 96-A

E

Tecogen, Inc
Texaco
Texas-Ohio Company *
TFS Energy *
Transwestern Pipeline Co.
Turlock Irrigation District
TXU Energy Services
United Cogen Inc SFONU *
URM Groups *
Utility Cost Management LLC
Utility Resource Network
Valeri, Jennifer *
VARI Consulting *
W M A *
Walter, Matt
Wellhead Electric Company
White & Case LLP *

*RECEIVE ADVICE LETTERS VIA E-MAIL