

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

Tel. No. (415) 703-1691



February 14, 2005

Advice Letter 2569-E

Rose de la Torre
Pacific Gas & Electric
77 Beale Street, Room 1088
Mail Code B10C
San Francisco, CA 94105

Subject: Proposal for changes to Advanced Metering and Demand Response Account and request for Disposition and recovery of the balance in the account

Dear Ms de la Torre:

Advice Letter 2569-E is effective October 15, 2004 by Resolution E-3911. A copy of the advice letter is returned herewith for your records.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean H. Gallagher".

Sean H. Gallagher, Director
Energy Division



**Pacific Gas and
Electric Company**

Brian K. Cherry
Director
Regulatory Relations

77 Beale Street, Room 1087
San Francisco, CA 94105

Mailing Address
Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

October 15, 2004

**Advice 2569-E
(Pacific Gas and Electric Company ID U 39 E)**

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Public Utilities Commission of the State of California

Subject: Proposal of Pacific Gas and Electric Company for Changes to the Advanced Metering and Demand Response Account and Request for Disposition and Recovery of the Balance in the Account

Pacific Gas and Electric Company (PG&E) hereby submits for filing revisions to the Advanced Metering and Demand Response Account (AMDRA). The affected tariff sheets are listed on the enclosed Attachment I. PG&E also seeks authority to recover the current balance in this account. The detailed worksheet is in the enclosed Attachment II.

Background

Order Instituting Rulemaking (R.) 02-06-001 began a process to assess ways to implement programs and tools to enable utilities to meet demand response targets.

Consistent with the Energy Action Plan, PG&E supports building a diversified portfolio that gives first preference to cost-effective energy efficiency and demand response programs, environmentally sustainable emerging technologies and renewable projects.

Since demand response programs are a key element of PG&E's diversified portfolio approach, PG&E has engaged in extensive efforts to foster those programs and it will continue to do so in the future. As of July 2004, PG&E's price-responsive demand response programs have obtained commitments to reduce peak demand by 333 megawatts (MW) when needed, and customers are continuing to sign up for these programs. In a request filed today in R. 02-06-001, PG&E is proposing some changes to its existing demand response programs, some new programs, and a related budget for 2005 – 2008. Today PG&E is also filing a preliminary business case analysis for advanced metering infrastructure (AMI), as directed by the Commission. PG&E is moving forward as rapidly as possible to develop and complete its AMI business case analysis in

order to file an application for potential AMI rollout. In conjunction with that work PG&E is continuing to explore how related applications such as smart thermostats and direct load control programs can work in tandem with advanced technologies to realize additional demand response. PG&E has included a budget for development of such a program in the proposed 2005 – 2008 demand response program budget noted above. The costs to develop, implement, and measure demand response programs are placed in the AMDRA account.

Purpose

PG&E seeks approval for the disposition of the current balance in the Advanced Metering and Demand Response Account, which represents expenditures for previously approved programs.

Further, PG&E is also asking for prospective changes in this advice in order to implement the changes requested in PG&E's parallel filing in R.02-06-001, dated October 15, 2004:

1. Allow capital costs associated with demand response programs to be recorded in AMDRA as currently permitted for SCE and SDG&E¹;
2. Add certain provisions to allow the following to be recorded in AMDRA (a) program development costs associated with new demand response programs proposed in PG&E's demand response proposals filed today in R. 02-06-001 and (b) program development costs incurred in the fourth quarter of 2004 for the timely implementation of the proposed 2005 programs.
3. Add specific provisions regarding disposition of the account.

AMDRA Recovery

AMDRA states: "PG&E shall file an annual advice letter, which shall include a summary of the entries to this account and a proposal for the disposition of the balance in the account." PG&E proposes to recover the current balance² in the account by transferring the balance to the Distribution Revenue Adjustment Mechanism (DRAM) and has included a summary of the entries to this account in Attachment II.

PG&E seeks to recover this revenue in distribution rates. PG&E proposes to recover the costs recorded in AMDRA from all customers because demand response programs produce demand reductions on system peak days for the benefit of all customers. In addition, costs related to the Statewide Pricing Pilot and development of an AMI business case include research and evaluation on

¹ The mechanisms for SCE and SDG&E were approved in SCE's Advice 1800-E and SDG&E's Advice 1570-E-A.

² PG&E is seeking approval of 2004 costs to date because the balance prior to January 1, 2004, was included in the headroom calculation filed in Advice 2555-G/2521-E, dated June 14, 2004.

ways to gain future demand response from all customer segments to the benefit of all customers.

Furthermore, PG&E seeks to amend the preliminary statement to AMDRA as follows, to provide a specific mechanism for recovery of costs recorded in AMDRA in conformance with the AMDRA accounts of the other utilities:

Disposition: Annually, PG&E will file an advice letter, which shall include a summary of the entries to this account requesting recovery of the balance. Upon approval, PG&E will transfer the balance to the Distribution Revenue Adjustment Mechanism (DRAM), or other appropriate balancing account, in order to consolidate rate recovery of the AMDRA balance with rate recovery of other Commission-approved revenue requirement changes.

Approval of this advice filing before December 31, 2004 will allow PG&E to place these costs in rates by consolidating this balance with the request for recovery of DRAM through PG&E's Annual Electric True-up filing for rates effective January 1, 2005.

Capital Costs

PG&E proposes to add a section to PG&E's Electric Preliminary Statement CS - *Advanced Metering and Demand Response Account*, to conform its provisions with the AMDRA accounts of the other utilities and to allow PG&E to record capital-related costs in AMDRA.

Currently, there is not a provision in PG&E's electric Preliminary Statement CS (AMDRA) for recovery of capital costs. PG&E proposes new language to the AMDRA Preliminary Statement as follows:

PG&E will record a debit entry for capital-related revenue requirements, if any, that includes depreciation expense, the return on investment, federal and state income taxes, and property taxes associated with the costs of installing equipment.

This language will allow PG&E to record capital-related costs associated with approved demand response programs in AMDRA. For example, if customers participating in the demand response programs lack an interval meter or other specific technology, PG&E proposes to provide the meter and any necessary communications equipment at no cost to the customer and to record the capital-related revenue requirement monthly in AMDRA.

Program Development Costs

To provide for recovery of all the costs associated with programs being proposed by PG&E for 2005, PG&E proposes to add the following language to section

5.a.6 of AMDRA (bolded below). These changes would accomplish two objectives. First, they would allow PG&E to record program development costs that need to be incurred in the fourth quarter of 2004 for development of new 2005 programs. PG&E is explicitly seeking authorization to reallocate, in 2004, unspent funds approved for 2004 the development of new programs proposed for 2005. Second, the changes would allow PG&E to record, in 2005, the costs of programs approved by the Commission in response to today's filing in R.02-06-001 proposing new programs for 2005:

*Miscellaneous large customer **program development**, tariff refinement and implementation activities reasonably necessary to ensure timely implementation of large customer tariffs and programs approved in the Phase 1 decision and **subsequent rulings**.*

To the extent PG&E incurs incremental costs for development of the demand response programs, PG&E will record a debit entry to AMDRA for the costs.

Consistent with prior commitments, PG&E will track each program and its costs separately for review and will describe the program status in its monthly Load Management/Demand Response Report.

Proposed Implementation

PG&E will implement the changes to the AMDRA immediately upon Commission authorization and will move forward with the recovery of the account balance as directed.

Request for Commission Approval

PG&E requests the Commission approve by resolution on or before **November 19, 2004**, but no later than **December 2, 2004**, PG&E's request and specifically finding that:

1. PG&E is authorized to implement changes to its preliminary statement as described herein; and
2. PG&E is authorized to recover the account balance through distribution rates, as described herein.

In order to meet the requested approval date of on or before **November 19, 2004**, but no later than **December 2, 2004**, PG&E respectfully requests the Commission to expedite the protest period for good cause shown, in accordance with General Order 96-A, Section IV-B Effective Date and Section XV-Exceptions. The Commission may reduce the comment period for a draft

resolution provided by Public Utilities Code Section 331(g)(1) in accordance with its rules adopted pursuant to that Section. In accordance with Commission Rule of Practice and Procedure 77.7 (f)(9), PG&E requests that the Commission reduce the comment period due to public necessity.

Protests

PG&E requests that anyone wishing to protest this filing do so by sending a letter by **October 25, 2004**, which is 10 days from the date of this filing and less than the 20 days provided for by General Order 96-A, Section II.G. 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 Chief – Energy Division
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102
Facsimile: (415) 703-2200
E-mail: jjr@cpuc.ca.gov

Protests also should be sent by e-mail and facsimile to Mr. Jerry Royer, Energy Division, as shown above, and by U.S. mail to Mr. Royer at the above address.

The protest should be sent via both e-mail and facsimile to PG&E on the same date it is mailed or delivered to the Commission at the address shown below.

Pacific Gas and Electric Company
Attention: Brian K. Cherry
Director, Regulatory Relations
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-7226
E-mail: RxDd@pge.com

Effective Date

In accordance with General Order 96-A, Section V.B., PG&E requests that this advice filing is effective **October 15, 2004**, which is less than regular notice and the date of filing.

Notice

In accordance with General Order 96-A, Section III, Paragraph G, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.02-06-001. Address changes should be directed to Rose De La Torre at (415) 973-4716. Advice letter filings can also be accessed electronically at:

<http://www.pge.com/tariffs>


Director - Regulatory Relations

Attachments

cc: Service List R.02-06-001

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
22317-E	Electric Preliminary Statement CS – Advanced Metering and Demand Response Account (AMDRA)	21510-E
22318-E	Electric Preliminary Statement CS (continued)	21566-E
22319-E	Table of Contents – Preliminary Statements (Continued)	21880-E
22320-E	Table of Contents	22087-E



PRELIMINARY STATEMENT

CS. ADVANCED METERING AND DEMAND RESPONSE ACCOUNT (AMDRA)

- 1. **PURPOSE:** The purpose of the Advanced Metering and Demand Response Account (AMDRA) is to record and recover the incremental, one-time set-up and ongoing Operating and Maintenance (O&M) and Administrative and General (A&G) expenses incurred to develop and implement, or in reasonable anticipation of implementing (i.e., all development and implementation costs incurred after January 1, 2003), the demand response programs adopted in Phase 1, Phase 2 and subsequent rulings, pertaining to the Advanced Metering, Demand Response, and Dynamic Pricing Proceeding. The authorization for recovery in Phase 1 is pursuant to Ordering Paragraph 8 of Decision 03-03-036 and in Phase 2 is pursuant to the Assigned Commissioner's Ruling and Scoping Memo, date November 24, 2003.

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(T)

In addition, pursuant to Decision 04-01-012, the AMDRA will also record the Statewide Pricing Pilot (SPP) 2004 activities, and the administrative costs associated with Phase 2 of Rulemaking 02-06-001.

- 2. **APPLICABILITY:** The AMDRA applies to all customer classes, except for those specifically excluded by the Commission.
- 3. **REVISIONS:** The revision dates applicable to the AMDRA shall be upon approval of the annual advice filing referenced below or as otherwise ordered by the Commission.
- 4. **RATES:** The current AMDRA does not have a rate component.
- 5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the AMDRA by making entries to this account at the end of each month as follows:
 - a. A debit entry equal to the UDC's incremental one-time "set up" and ongoing O&M and A&G expenses incurred to develop and implement, or incurred in reasonable anticipation of implementing, the following programs being developed in Rulemaking 02-06-001: (1) the statewide pricing pilot (SPP) for small customers (under 200 kW), and (2) demand response tariffs and programs for large customers (greater than 200 kW), including:
 - 1. Market research prerequisite to SPP implementation;
 - 2. Development of rate, information, and technology treatments for various SPP cells;
 - 3. Sample design for various SPP cells;
 - 4. Miscellaneous pilot design refinement and implementation activities;
 - 5. Development of systems for billing and implementing tariffs and programs for large customers; and
 - 6. Miscellaneous large customer program development tariff refinement and implementation activities reasonably necessary to ensure timely implementation of customer tariffs and programs approved in the Phase 1 decision and subsequent rulings.
 - 7. Incremental activities in 2004 as described in Decision 04-01-012 which include: (1) Automated Demand Response System Pilot and Enabling Technologies, (2) CPP-V Track A/Enhanced Website Information, (3) San Francisco Co-op Track B, and (4) Additional Pilot Evaluation and Customer Research Activities.

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(Continued)



PRELIMINARY STATEMENT

(Continued)

CS. ADVANCED METERING AND DEMAND RESPONSE ACCOUNT (AMDRA) (Cont'd.)

5. ACCOUNTING PROCEDURE: (Cont'd.)

d. A debit entry for capital-related revenue requirements, if any, that includes depreciation expense, the return on investment, federal and state income taxes, and property taxes associated with the costs of installing equipment. (N)
 |
 (N)

e. A debit entry equal to the interest on the average of the balance at the beginning of the month and the balance after the above entry at a rate equal to one-twelfth the interest rate on three-month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor. (T)

Disposition: Annually, PG&E will file an advice letter, which shall include a summary of the entries to this account requesting recovery of the balance. Upon approval, PG&E will transfer the balance to the Disposition Revenue Adjustment Mechanism (DRAM), or other appropriate balancing account, in order to consolidate rate recovery of the AMDRA balance with rate recovery of other Commission-approved revenue requirement changes. (T)
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Part CC	Real Time Energy Metering Memorandum Account	18307,18308-E
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(Continued)

Advanced Metering and Demand Response Account
Account Activity
January 1, 2004 through September 30, 2004

Advanced Metering and Demand Response Account (AMDRA)
January 1, 2004 through September 30, 2004 Account Activity

Program	Per Month												Total
	January	February	March	April	May	June	July	August	September				
Working Group 2:													
Critical Peak Pricing	\$ 89,380.66	\$ 156,772.21	\$ 51,463.04	\$ 100,733.11	\$ 229,525.16	\$ 45,485.57	\$ 40,263.44	\$ 36,102.06	\$ 75,218.72	\$ 824,943.97			
Large Customer Demand Response Programs	\$ 2,000.04	\$ 5,283.75	\$ 3,690.80	\$ 26,191.56	\$ 3,573.48	\$ 3,563.55	\$ 2,265.42	\$ 4,074.37	\$ 4,421.73	\$ 55,064.70			
Demand Reserves Partnership	\$ 226,260.30	\$ 16,161.46	\$ 16,455.56	\$ 4,717.47	\$ 12,879.75	\$ 18,110.30	\$ 17,084.87	\$ 18,031.65	\$ 515,056.48	\$ 844,757.84			
E-Save	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,862.40	\$ 23,279.66	\$ 5,866.28	\$ 31,008.34			
Power Down	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 679.49	\$ -	\$ 679.49			
Meter Installations	\$ 10,275.21	\$ -	\$ 5,338.97	\$ -	\$ -	\$ 365.76	\$ 1,072.58	\$ 21,355.84	\$ 5,338.95	\$ 43,747.31			
Customer Market Research	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 148,134.10	\$ 148,134.10			
Working Group 2 Total	\$ 327,916.21	\$ 178,217.42	\$ 76,948.37	\$ 131,642.14	\$ 245,978.39	\$ 67,525.18	\$ 62,548.71	\$ 103,523.07	\$ 754,036.26	\$ 1,948,335.75			
Working Group 3													
Statewide Pricing Pilot	\$ 101,795.88	\$ 278,322.67	\$ 136,360.95	\$ 209,169.77	\$ 203,367.01	\$ 247,436.06	\$ 214,145.12	\$ 185,727.77	\$ 224,481.34	\$ 1,800,806.57			
Automated Demand Response System	\$ -	\$ 1,466.83	\$ 1,026.54	\$ 28,132.30	\$ 125,514.06	\$ 15,166.31	\$ 7,094.43	\$ 147,433.54	\$ 4,037.87	\$ 329,873.88			
Working Group 3 Total	\$ 101,795.88	\$ 279,789.50	\$ 137,387.49	\$ 237,302.07	\$ 328,881.07	\$ 262,604.37	\$ 221,239.55	\$ 333,161.31	\$ 228,519.21	\$ 2,130,680.45			
Business Case													
Business Case Development	\$ 13,695.40	\$ 163,748.66	\$ 80,167.65	\$ 217,995.95	\$ 10,985.99	\$ 60,417.87	\$ 21,475.53	\$ 27,104.70	\$ 40,890.66	\$ 636,482.41			
Pre-Deployment & Planning	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			
Pre-Deployment Total	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			
Interest Rate	1.05%	1.01%	1.01%	1.00%	1.05%	1.07%	1.34%	1.50%	1.62%				
Interest	\$ 4,957.86	\$ 5,221.42	\$ 5,611.37	\$ 5,933.75	\$ 6,748.77	\$ 7,312.22	\$ 9,554.02	\$ 11,187.40	\$ 13,101.38	\$ 69,628.19			
Interest Total	\$ 4,957.86	\$ 5,221.42	\$ 5,611.37	\$ 5,933.75	\$ 6,748.77	\$ 7,312.22	\$ 9,554.02	\$ 11,187.40	\$ 13,101.38	\$ 69,628.19			
Monthly Total	\$ 439,712.07	\$ 627,240.60	\$ 200,112.83	\$ 392,877.91	\$ 597,864.22	\$ 397,417.82	\$ 214,373.14	\$ 474,974.46	\$ 1,000,577.73	\$ 7,888,573.89			

*Incentive payments are recovered directly through the Energy Resource Recovery Account (ERRA) per D.03-03-036 and therefore, have not been included in this category.

**PG&E Electric Advice Filing List
General Order 96-A, Section III(G)**

ABAG Power Pool
Aglet Consumer Alliance
Agnews Developmental Center
Ahmed, Ali
Alcantar & Elsesser
Anderson Donovan & Poole P.C.
Applied Power Technologies
APS Energy Services Co Inc
Arter & Hadden LLP
Avista Corp
Barkovich & Yap, Inc.
BART
Bartle Wells Associates
Blue Ridge Gas
Bohannon Development Co
BP Energy Company
Braun & Associates
C & H Sugar Co.
CA Bldg Industry Association
CA Cotton Ginners & Growers Assoc.
CA League of Food Processors
CA Water Service Group
California Energy Commission
California Farm Bureau Federation
California ISO
Calpine
Calpine Corp
Calpine Gilroy Cogen
Cambridge Energy Research Assoc
Cameron McKenna
Cardinal Cogen
Cellnet Data Systems
Chevron Texaco
Childress, David A.
City of Glendale
City of Healdsburg
City of Palo Alto
City of Redding
CLECA Law Office
Constellation New Energy
Cooperative Community Energy
CPUC
Creative Technology
Crossborder Inc
CSC Energy Services
Davis, Wright Tremaine LLP
Davis, Wright, Tremaine, LLP
Defense Fuel Support Center
Department of the Army
Department of Water & Power City
Dept of the Air Force
DGS Natural Gas Services
DMM Customer Services
Douglass & Liddell

Downey, Brand, Seymour & Rohwer
Duke Energy
Duke Energy North America
Duncan, Virgil E.
Dutcher, John
Dynergy Inc.
Ellison Schneider
Energy Law Group LLP
Energy Management Services, LLC
Enron Energy Services
Exeter Associates
Foster, Wheeler, Martinez
Franciscan Mobilehome
Future Resources Associates, Inc
G. A. Krause & Assoc
Gas Transmission Northwest Corporation
GLJ Energy Publications
Goodin, MacBride, Squeri, Schlotz &
Hanna & Morton
Heeg, Peggy A.
Hogan Manufacturing, Inc
House, Lon
Imperial Irrigation District
Integrated Utility Consulting Group
International Power Technology
J. R. Wood, Inc
JTM, Inc
Kaiser Cement Corp
Korea Elec Power Corp
Marcus, David
Masonite Corporation
Matthew V. Brady & Associates
Maynor, Donald H.
McKenzie & Assoc
McKenzie & Associates
Meek, Daniel W.
Mirant California, LLC
Modesto Irrigation Dist
Morrison & Foerster
Morse Richard Weisenmiller & Assoc.
New United Motor Mfg, Inc
Norris & Wong Associates
North Coast Solar Resources
Northern California Power Agency
PG&E National Energy Group
Pinnacle CNG Company
PITCO
PPL EnergyPlus, LLC
Price, Roy
Product Development Dept
R. M. Hairston & Company
R. W. Beck & Associates
Recon Research
Regional Cogeneration Service

RMC Lonestar
Sacramento Municipal Utility District
SCD Energy Solutions
Seattle City Light
Sempra
Sempra Energy
Sequoia Union HS Dist
SESCO
Sierra Pacific Power Company
Silicon Valley Power
Simpson Paper Company
Smurfit Stone Container Corp
Southern California Edison
SPURR
St. Paul Assoc
Stanford University
Sutherland, Asbill & Brennan
Tabors Caramanis & Associates
Tansev and Associates
Tecogen, Inc
TFS Energy
TJ Cross Engineers
Transwestern Pipeline Co
Turlock Irrigation District
U S Borax, Inc
United Cogen Inc.
URM Groups
Utility Cost Management LLC
Utility Resource Network
Wellhead Electric Company
Western Hub Properties, LLC
White & Case
WMA