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April 11, 2005

Advice 2650-E
(Pacific Gas and Electric Company ID U39E)

Public Utilities Commission of the State of California

Subject: Establishment of Subaccounts in the Modified Transition Cost Balancing Account for Bundled and Direct Access, Municipal Departing Load, and Customer Generation Departing Load in Compliance with Decision 05-02-040 and Approval of Tariff Modifications to the Energy Resource Recovery Account, the Utility Generation Balancing Account, and the Power Charge Collection Balancing Account Reflecting the Ongoing Competition Transition Charge Revenue Requirement adopted in Decisions 05-02-040 and 05-01-031

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits this advice letter in compliance with Decision (D.) 05-02-040, *Opinion on Pacific Gas and Electric Company's Energy Resource Recovery Account (ERRA)*. In this advice letter PG&E requests that the Commission approve the creation of subaccounts in the Modified Transition Cost Balancing Account (MTCBA) for bundled and direct access customers (DA), municipal departing load (MDL), and customer generation departing load (CGDL) as directed in Ordering Paragraph (OP) 6 of D.05-02-040. PG&E submits this advice letter within 45 days after the effective date of D.05-02-040.

In Application 04-06-003, PG&E's 2005 ERRA proceeding, PG&E proposed the establishment of the aforementioned subaccounts in the MTCBA to more precisely track costs, revenues, and over- or under-collections uniquely applicable to the bundled and DA, MDL, and CGDL customer groups. With the creation of these three new subaccounts, the MTCBA will have a total of four subaccounts, including the Electric Restructuring Costs Account (ERCA) subaccount which became effective December 2, 2004. (See Advice 2602-E).

PG&E also takes this opportunity to request that the Commission approve elimination of the Western Area Power Administration (WAPA) tariff line items

associated with recovery of WAPA as an ongoing Competition Transition Charge (CTC) in the following four balancing accounts: MTCBA, Energy Resource Recovery Account (ERRA), Utility Generation Balancing Account (UGBA), and Power Charge Collection Balancing Account (PCCBA). Elimination of the WAPA tariff line items in these preliminary statements reflects the fact that the WAPA contract was terminated as of December 31, 2004 and thus, PG&E is no longer incurring costs to support the WAPA contract obligation. The original authority to recover WAPA costs as an ongoing CTC was established in Direct Access Suspension Order Instituting Rulemaking 02-01-011, Decision 02-11-022.

In addition, PG&E requests that the Commission approve a modification to the ERRA preliminary statement such that there are two tariff line items to record qualifying facility (QF) contract costs. PG&E's 2004 ERRA decision, D.05-01-031, adopted an ongoing CTC revenue requirement that had expressly delineated between QF contracts that were eligible to be collected as an ongoing CTC and QF contracts that were not CTC-eligible. In order to properly record and recover QF costs according to their CTC eligibility, PG&E proposes that the existing QF tariff line be modified and that an additional QF line item be established such that CTC eligible QF costs are tracked separately from non-CTC eligible QF costs.

PG&E has included its proposed modified tariffs in the attached MTCBA, ERRA, UGBA, and PCCBA preliminary statements.

Conclusion

PG&E requests that the Commission adopt the establishment of three new subaccounts in the MTCBA preliminary statement, the proposed changes to the MTCBA, ERRA, UGBA, and PCCBA preliminary statements to reflect the termination of the WAPA contract, and two tariff line items in the ERRA preliminary statement to properly delineate QF costs according to their CTC eligibility.

Protest

Anyone wishing to protest this filing may do so by sending a letter by **May 2, 2005**, which is 21 days from the date of 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 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

April 11, 2005

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.

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Attention: Brian K. Cherry
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P.O. Box 770000
San Francisco, California 94177
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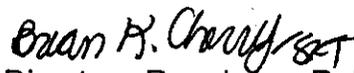
Effective Date

In compliance with D. 05-02-040, PG&E requests that Advice 2650-E be effective on **April 11, 2005**.

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 parties on the service list for Rulemaking (R.) 01-10-024 and Application (A.) 04-06-003. 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 Lists R.01-10-024, A.04-06-003

**ATTACHMENT I
ADVICE 2650-E**

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
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23259-E	Preliminary Statements -- Part CP -- Energy Resource Recovery Account	21127-E
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23262-E	Preliminary Statements -- Part CQ -- Modified Transition Cost Balancing Account	22481-E
23263-E	Preliminary Statements -- Part CQ -- Modified Transition Cost Balancing Account	22482-E
23264-E	Preliminary Statements -- Part CQ -- Modified Transition Cost Balancing Account	22482-E
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PRELIMINARY STATEMENT
(Continued)

CG. UTILITY GENERATION BALANCING ACCOUNT (UGBA) (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.)

- c. A debit entry equal to the annual authorized revenue requirements associated with PG&E's owned generation divided by twelve;
- d. A debit entry equal to the costs of providing video tapes of the Diablo Canyon Independent Safety Committee meetings;
- e. A debit or credit entry, as appropriate, to record the transfer of amounts from other accounts to the UGBA for recovery in rates, upon approval by the CPUC.
- f. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of 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.

(D)

(T)

(T)



PRELIMINARY STATEMENT
(Continued)

CP. ENERGY RESOURCE RECOVERY ACCOUNT (ERRA) (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.)

d) A credit entry equal to revenue associated with designated sales;

(D)

The following entry reflects the ongoing CTC portion of procurement costs included in the Modified Transition Cost Balancing Account for recovery:

e) A credit entry equal to the sum of the costs for the ongoing CTCs associated with QF obligations and PPA obligations above the market benchmark currently adopted by the Commission;

(T)
|
(T)

The following entries reflect the total costs associated with procuring electricity for customers and other related costs:

f) A debit entry equal to the amount paid for ISO-related charges;

(T)

g) A debit entry equal to the sum for the month of the product of: (1) the Millions of British Thermal Units (MMBtu) of natural gas burned daily for all purposes at PG&E's fossil plants; and (2) that day's weighted-average cost of gas on a Utility Electric Generation (UEG) portfolio basis (\$/MMBtu);

(T)

h) A debit entry equal to the sum for the month of the product of: (1) the barrels of distillate and heavy fuel oil burned daily for all purposes at the fossil plants; and (2) that day's weighted-average cost of distillate or fuel oil per barrel on a "last-in-first-out" (LIFO) basis;

(T)

i) A debit entry equal to the hydroelectric fuel expenses. The fuel expenses include water purchase costs for the hydroelectric plants;

(T)

j) A debit entry equal to fuel expenses for the Diablo Canyon Nuclear Power Plant;

(T)

k) A debit entry equal to total costs associated with QF obligations that are eligible for recovery as an ongoing CTC;

(T)

l) A debit entry to total costs associated with QF obligations that are not eligible for recovery as an ongoing CTC;

(N)
(N)

m) A debit entry equal to bilateral contract obligations;

(T)

(Continued)



PRELIMINARY STATEMENT
(Continued)

CP. ENERGY RESOURCE RECOVERY ACCOUNT (ERRA) (Cont'd.)

5. ACCOUNTING PROCEDURES: (Cont'd.)

- n) A debit entry equal to hedging contract obligations; (T)
- o) A debit entry equal to renewable contract obligations; (T)
- p) A debit entry equal to costs associated with irrigation district contracts and other purchase power obligations, excluding WAPA but including capacity contract obligations; (T)
- q) A debit entry equal to spot market purchases; (T)
- r) A debit entry equal to system tolling or capacity contract obligations; (T)
- s) A debit or credit entry equal to pre-payments and credit and collateral payments, including all associated fees, for procurement purchase and, if applicable, reimbursements of pre-payments, credit and collateral payments; (T)
- t) A debit entry equal to incentive payments authorized in the Phase 1 decision of the Advanced Metering, Demand Response, and Dynamic Pricing Proceeding pursuant to Decision 03-03-036; (T)
- u) A debit entry equal to any other power costs associated with procurement; and (T)
- v) A monthly entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor. (T)



PRELIMINARY STATEMENT
(Continued)

CQ. MODIFIED TRANSITION COST BALANCING ACCOUNT (MTCBA)

- 1. **PURPOSE:** The purpose of the MTCBA is to record ongoing transition costs associated with procurement (Decision (D.)02-11-022, D.03-04-030, D.03-07-028), employee transition costs, and other costs as authorized by the Commission and to record and recover \$80 million in costs related to the settlement of the Electric Restructuring Costs Account (ERCA), authorized in Decision 04-12-017 for recovery over a one year period. Decision 05-02-040 authorized the establishment of subaccounts to more precisely track costs, revenues, and over- or under-collections uniquely applicable to individual customer groups. (N)
(N)

The MTCBA is comprised of four subaccounts. The first subaccount will track the over- / under-collections attributable to the bundled and direct access (DA) customers' ongoing competition transition charge (CTC) costs authorized by the Commission. The second subaccount will track the over- / under-collections attributable to the customer generation departing load (CGDL) customers' ongoing CTC authorized by the Commission. The third subaccount will track the over- / under-collections attributable to the Municipal departing load (MDL) customers' ongoing CTC authorized by the Commission. The fourth subaccount will be the ERCA subaccount which will track over- / under-collections attributable to the ERCA settlement amount authorized in D.04-12-017, and to be recovered from bundled and direct access customers over a one-year period. The ERCA settlement provides that recovery will exclude departing load customers. (T)

- 2. **APPLICABILITY:** The MTCBA shall apply to all rate schedules and contracts for electric service subject to the jurisdiction of the Commission, except for those schedule and contracts specifically excluded by the Commission.
- 3. **REVISION DATE:** Disposition of amounts in this account shall be determined through the advice letter process. (T)
(T)
- 4. **RATE:** The MTCBA rates are referred to as Competition Transition Charge rates and are set forth in each electric rate schedule. The CTC rates are composed of the ongoing CTC rates, applicable to bundled, DA, and DL customers and the ERCA CTC rates, applicable to bundled and DA customers. The ERCA CTC rates are separately identified in Part I of the Preliminary Statement, to be filed with PG&E's supplement to Advice 2570-E, scheduled to be filed by December 30, 2004.
- 5. **ACCOUNTING PROCEDURE:** PG&E shall make entries to the following subaccounts at the end of each month as follows:
 - a. **Bundled and DA Ongoing CTC Subaccount:** (T)
 - 1) A credit entry equal to the revenue from the ongoing CTC rate component from bundled and DA customers during the month; excluding the allowance for Franchise Fees and Uncollectible (FF&U) Accounts expense. (T)
 - 2) A debit entry equal to bundled and DA customers' share of costs associated with any buy-out, buy-down, renegotiation, or termination of Qualifying Facility (QF) contracts and settlements or judgments related to QF power purchase agreements. (D)
(T)
(T)

(Continued)



PRELIMINARY STATEMENT
(Continued)

CQ. MODIFIED TRANSITION COST BALANCING ACCOUNT (MTCBA)

5. ACCOUNTING PROCEDURE: (Cont'd.)

a. Ongoing CTC Subaccount: (Cont'd.)

- 3) A debit entry equal is bundled and DA customers' share of ten percent of the total net-present-value of the ratepayer benefits from a restructured QF contract, at the time the restructured contract is signed. (T) (L)
- 4) A debit or credit entry equal to bundled and DA customers' share upon Commission approval of a restructured contract to true-up for any difference between the initial net present value (Item 5.a. above), and the final Commission-approved net present value of the restructured QF contract and to adjust the interest computation in Item 5.a.8 below for the effect of the true-up. (T) (L)
- 5) A credit entry equal to bundled and DA customers' share of the revenue received from the sale of excess sulfur dioxide emission credits, less reasonably incurred sales costs not already recovered in rates (D.97-11-074, Section 11.7.3). (T)

The following entry reflects the ongoing CTC costs associated with PG&E's procurement portfolio from the Energy Resource Recovery Account (ERRA) for recovery in this account: (T)

- 6) A debit entry equal to the above-market for ongoing CTC associated with QF obligations, PPA obligations, and PG&E owned generation above the market benchmark currently adopted by the Commission. (T)

The following entry reflects other ongoing transition costs for recovery in this subaccount: (T)

- 7) A debit entry equal to bundled and DA customers' share of PG&E's recorded employee transition costs for utility personnel affected by electric industry restructuring. These costs may be recovered through December 2006, pursuant to Decision 97-06-060, FOF 4, 24, COL 4, and 17. (T)
- 8) An entry equal to the interest on the average balance of the subaccount at the beginning of the month and the balance after the entries above, at a rate equal to one-twelfth the interest rate of the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor. (T)

(Continued)



PRELIMINARY STATEMENT
(Continued)

CQ. MODIFIED TRANSITION COST BALANCING ACCOUNT (MTCBA)

5. ACCOUNTING PROCEDURE: (Cont'd.)

b. Customer Generation Departing Load Ongoing CTC Subaccount:

- 1) A credit entry equal to the revenue from the ongoing CTC rate component from CGDL customers during the month; excluding the allowance for Franchise Fees and Uncollectible (FF&U) Accounts expense. (T)
- 2) A debit entry equal to CGDL customers' share costs associated with any buy-out, buy-down, renegotiation, or termination of Qualifying Facility (QF) contracts and settlements or judgments related to QF power purchase agreements. (T)
- 3) A debit entry equal to CGDL customers' share of ten percent of the total net-present-value of the ratepayer benefits from a restructured QF contract, at the time the restructured contract is signed. (T)
- 4) A debit or credit entry upon Commission approval equal to CGDL customers' share of a restructured contract to true-up for any difference between the initial net present value (Item 5.b.3. above), and the final Commission-approved net present value of the restructured QF contract and to adjust the interest computation in Item 5.b.8. below for the effect of the true-up. (T)
- 5) A credit entry equal to CGDL customers' share of the revenue received from the sale of excess sulfur dioxide emission credits, less reasonably incurred sales costs not already recovered in rates (D.97-11-074, Section 11.7.3). (N)

The following entry reflects the ongoing CTC costs associated with PG&E's procurement portfolio from the Energy Resource Recovery Account (ERRA) for recovery in this subaccount:

- 6) A debit entry equal to the above-market costs for ongoing CTC associated with QF obligations and PPA obligations, above the market benchmark currently adopted by the Commission.

The following entry reflects other ongoing transition costs for recovery in this subaccount:

- 7) A debit entry equal to CGDL customers' share of PG&E's recorded employee transition costs for utility personnel affected by electric industry restructuring. These costs may be recovered through December 2006, pursuant to Decision 97-06-060, FOF 4, 24, COL 4, and 17.
- 8) An entry equal to the interest on the average balance of the subaccount at the beginning of the month and the balance after the entries above, at a rate equal to one-twelfth the interest rate of the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor. (N)

(Continued)



PRELIMINARY STATEMENT
(Continued)

CQ. MODIFIED TRANSITION COST BALANCING ACCOUNT (MTCBA)

5. ACCOUNTING PROCEDURE: (Cont'd.)

(N)

c. Municipal Departing Load Ongoing CTC Subaccount:

- 1) A credit entry equal to the revenue from the ongoing CTC rate component from MDL customers during the month, excluding the allowance for Franchise Fees and Uncollectible (FF&U) Accounts expense.
- 2) A debit entry equal to MDL customers' share costs associated with any buy-out, buy-down, renegotiation, or termination of Qualifying Facility (QF) contracts and settlements or judgments related to QF power purchase agreements.
- 3) A debit entry equal to MDL customers' share of ten percent of the total net-present-value of the ratepayer benefits from a restructured QF contract, at the time the restructured contract is signed.
- 4) A debit or credit entry upon Commission approval equal to MDL customers' share of a restructured contract to true-up for any difference between the initial net present value (Item 5.b.3. above), and the final Commission-approved net present value of the restructured QF contract and to adjust the interest computation in Item 5.b.8. below for the effect of the true-up.
- 5) A credit entry equal to MDL customers' share of the revenue received from the sale of excess sulfur dioxide emission credits, less reasonably incurred sales costs not already recovered in rates (D.97-11-074, Section 11.7.3).

The following entry reflects the ongoing CTC costs associated with PG&E's procurement portfolio from the Energy Resource Recovery Account (ERRA) for recovery in this subaccount:

- 6) A debit entry equal to the above-market costs for ongoing CTC associated with QF obligations and PPA obligations, above the market benchmark currently adopted by the Commission.

(N)

(L)

(Continued)



PRELIMINARY STATEMENT
(Continued)

CQ. MODIFIED TRANSITION COST BALANCING ACCOUNT (MTCBA)

5. ACCOUNTING PROCEDURE: (Cont'd.)

c. Municipal Departing Load Ongoing CTC Subaccount: (Cont'd.)

The following entry reflects other ongoing transition costs for recovery in this subaccount:

- 7) A debit entry equal to MDL customers' share of PG&E's recorded employee transition costs for utility personnel affected by electric industry restructuring. These costs may be recovered through December 2006, pursuant to Decision 97-06-060, FOF 4, 24, COL 4, and 17.
- 8) An entry equal to the interest on the average balance of the subaccount at the beginning of the month and the balance after the entries above, at a rate equal to one-twelfth the interest rate of the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)

(N)

d. ERCA CTC Subaccount:

- 1) A credit entry equal to the revenue from the ERCA CTC rate component from bundled and DA customers during the month; excluding the allowance for Franchise Fees and Uncollectible (FF&U) Accounts expense.
- 2) A one-time debit entry equal to the ERCA settlement amount of \$80 million authorized for recovery in D.04-12-017.
- 3) An entry equal to the interest on the average balance of the subaccount at the beginning of the month and the balance after the entries above, at a rate equal to one-twelfth of the interest rate of the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(T) (L)

(L)

(Continued)



PRELIMINARY STATEMENT
(Continued)

DG. POWER CHARGE COLLECTION BALANCING ACCOUNT (PCCBA)

1. **PURPOSE:** The purpose of the Power Charge Collection Balancing Account (PCCBA) is to track the difference between (i) the amounts collected by PG&E on behalf of DWR as DWR's agent and remitted to the Department of Water Resources (DWR) pursuant to the remittance formula under PG&E's applicable Servicing Order, using the Power Charge Remittance Rate established in the relevant Commission decisions, and (ii) the portion of total amounts collected from bundled customers attributable to the Power Charge Collection Balancing Account rate component. PCCBA is a customer balancing account and in no way changes the remittance formula or Commission decisions or changes PG&E's obligations to segregate and hold Power Charges from customers in trust for the benefit of DWR pursuant to Water Code § 80112. To the extent that the amount derived from bundled customers under the PCCBA rate component is greater or less than the amount of DWR Power Charges remitted to DWR from bundled customers, that difference will be reflected in setting bundled customers' future PCCBA rate component.

A portion of the energy supplied to PG&E's customers is provided by DWR. PG&E as an agent for DWR bills its customers for this energy and forwards the revenues collected to DWR at the Power Charge Remittance Rate established in the relevant Commission decisions. The proportion of the total energy provided to PG&E's customers by DWR varies from the original forecast due to normal load and DWR contract delivery fluctuations. The PCCBA allows PG&E to set a rate component based on a forecast of the proportion of energy expected to be provided by DWR, and then to true-up the balance in this account annually in order to ensure that PG&E is not over- or under- collecting (from its bundled customers) for the energy that PG&E supplies due to variances in the proportion of energy supplied by DWR.

2. **APPLICABILITY:** The PCCBA shall apply to all bundled customers subject to the jurisdiction of the Commission, except for those specifically excluded by the Commission from DWR power charges.

3. **REVISION DATES:** Disposition of the balance in this account shall be determined through the advice letter process.

4. **RATES:** The PCCBA rates are set forth in electric Preliminary Statement Part I.

5. **ACCOUNTING PROCEDURES:** The following entries shall be made each month:

a. A debit entry equal to the obligation to DWR excluding Bond Charges and Direct Access DWR power charges.

b. A credit entry equal to the revenue from bundled customers through the PCCBA rate component.

c. An entry equal to the interest on the average of the balance at the beginning of the month and the balance after the above entries 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.

(D)

(T)



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A-6	Small General Time-of-Use Service	21340,23132,23133,21343,23134,21345-E
A-10	Medium General Demand-Metered Service	22941,23135,23136,23137,23138,21351,22942,23139,21354,21355-E
A-15	Direct-Current General Service	23140,23141-E
E-19	Medium General Demand-Metered Time-of-Use Service	21358,17092,22946,23142,23143,23144,23145,21364,22207,22208,22110,18864,21016,22111,21018,21019,16414,15330,21020,23146,23147,22210,20935,23148,20729,19805,21370,21371-E
E-20	Service to Customers with Maximum Demands of 1,000 Kilowatts or More	21372,21373,21349,21350,21377,22213,19314,22214,22112,21022,22113,21024,21025,22114,15358,21027,23151,23152,23153,23154,17101,20945,21383-E

(Continued)

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General Order 96-A, Section III(G)**

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California Energy Commission
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Creative Technology
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CSC Energy Services
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Davis, Wright, Tremaine, LLP
Defense Fuel Support Center
Department of the Army
Department of Water & Power City
DGS Natural Gas Services
DMM Customer Services
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Franciscan Mobilehome
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Imperial Irrigation District
Integrated Utility Consulting Group
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Korea Elec Power Corp
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Masonite Corporation
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Modesto Irrigation Dist
Morrison & Foerster
Morse Richard Weisenmiller & Assoc.
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Norris & Wong Associates
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Northern California Power Agency
PG&E National Energy Group
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PITCO
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Regional Cogeneration Service

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Seattle City Light
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Sempra Energy
Sequoia Union HS Dist
SESCO
Sierra Pacific Power Company
Silicon Valley Power
Simpson Paper Company
Smurfit Stone Container Corp
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Sutherland, Asbill & Brennan
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U S Borax, Inc
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