

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

Tel. No. (415) 703-1691



October 24, 2006

Advice Letter 2744-G/2861-E  
2744-G-A/2861-E-A

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

Subject: Request for authority to commence a credit card option pilot program for a 12 month period

Dear Ms de la Torre:

Advice Letter 2744-G/2861-E and 2744-G-A/2861-E-A is effective October 6, 2006 by Resolution G-3390. A copy of the advice letter is returned herewith for your records.

Sincerely,

Sean H. Gallagher, Director  
Energy Division

<b>REGULATORY RELATIONS</b>	
Tariffs Section	
M Brown	D Poster
R Dela Torre	S Ramaiya
B Lam	
OCT 13 2006	
_____ Records _____	
Return to _____	File _____
cc to _____	

**Brian K. Cherry**  
Vice President  
Regulatory Relations

77 Beale Street, Room 1087  
San Francisco, CA 94105

*Mailing Address*  
Mail Code B10C  
Pacific Gas and Electric Company  
P.O. Box 770000  
San Francisco, CA 94177

415.973.4977  
Internal: 223.4977  
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September 12, 2006

**Advice 2744-G-A/2861-E-A**  
(Pacific Gas and Electric Company ID U39 M)

Public Utilities Commission of the State of California

**Subject: Supplement -- Modify Credit Card Pilot Program Memorandum  
Account and Rule 9 Language**

Pacific Gas and Electric Company (PG&E) hereby submits this supplemental filing to Advice 2744-G/2861-E in compliance with Resolution G-3390 to revise PG&E's Credit Card Pilot Memorandum Accounts (CCPPMA) E, (Gas) EG (Electric) and PG&E's Rule 9. The affected tariff sheets are listed on the enclosed revised Attachment I. This supplemental advice filing only supersedes Advice 2744-G/2861-E as to Preliminary Statement Memorandum Account E, EG and PG&E's Rule 9 (gas and electric).

**Purpose**

Ordering paragraph (OP) 3 of Resolution G-3390 orders PG&E to file a supplemental advice letter within five days from the date of the resolution to "revise the CCPPMA to indicate that PG&E shall seek authorization from the Commission to recover any program costs." PG&E has added proposed language to Preliminary Statement E and Preliminary Statement EG so that the cost/savings analysis of the pilot program do not include any infrastructure or one-time costs so as not to 'skew' PG&E's cost/savings analysis over the course of the program.

Page 6 of Resolution G-3390 directs PG&E to:

...Take out language that states that it will make a credit and debit entry on a semi-annual basis to transfer all or part of the balance in the CCPPMA to the Distribution Revenue Adjustment Mechanism (DRAM), or its successor account, as approved by Commission decision. PG&E is directed not to transfer the balance in the CCPPMA until the Commission has reviewed

and approved the pilot program costs for recovery upon the conclusion of the 12-month pilot program.

With this supplemental filing, PG&E has withdrawn this language from the CCPMA (gas and electric), as directed by the Energy Division. PG&E intends to file its report after the 12-month pilot program and request to recover program costs in the CCPMA in an application to the Commission.

In accordance with Resolution G-3390, PG&E is filing revised language for Preliminary Statement E, Preliminary Statement EG and Rule 9(E)(5)(b) (gas and electric) to include language for personal credit card use for customers utilizing the pilot credit card program.

Additionally, PG&E requests that over the course of the pilot program the Commission take into account the increasing percentage of customers signing up for the recurring billing payment option. This option will be significantly cheaper than the one-time payment credit card option based on several factors including the elimination of a paper bill and the costs saved by avoiding stamps from PG&E's end and the customer's end. PG&E urges the Commission to take this into consideration when it evaluates the costs and savings of the program. If, as PG&E expects, the number of customer signing up for the recurring payment option grows each month, PG&E feels that this trend should be incorporated into the measurement of the success of the pilot program.

## **Tariff Changes**

### **Preliminary Statements**

The Preliminary Statement language being modified for infrastructure and one-time costs states:

In compliance with Resolution G-3390, PG&E will not include any and all infrastructure and one-time costs in the analysis of the costs and savings associated with this pilot program at the end of the 12 month period.

Preliminary Statement language being modified to accommodate personal credit cards now reads:

“The CCPMA shall initially apply to all residential customers who use an approved personal credit card, but may be open over the course of the pilot to one or more additional class of customers utilizing an approved personal credit card.”

The Rule 9(E)(5)(b) language being modified to accommodate personal credit cards now reads:

“All credit card payment options will initially apply to all residential customers who use an approved personal credit card, but may be open over the course of the pilot to one or more additional class of customers utilizing an approved personal credit card.”

With this filing PG&E proposes to supersede its Rule 9 tariffs and Preliminary Statements E and EG that were submitted in Advice 2744-G/2861-E.

### **Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than October 2, 2006, which is **20 days** after the date of this filing.

CPUC Energy Division  
Attention: Tariff Unit, 4<sup>th</sup> Floor  
505 Van Ness Avenue  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: [jjr@cpuc.ca.gov](mailto:jjr@cpuc.ca.gov) and [inj@cpuc.ca.gov](mailto:inj@cpuc.ca.gov)

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest also should be sent via U.S. mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

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

### **Effective Date**

PG&E requests that this advice filing become effective as soon as possible.

**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. 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>



Vice President -- Regulatory Relations

Attachment 1 --Tariff Sheets

Attachment 2 – Credit Card Service List

cc: Service List – Credit Card Service List  
Kevin Coughlin – CPUC  
Karl Bemedefer – CPUC  
Gurbux Kahlon – CPUC  
Maurice Monson - CPUC  
Kerrie Evans - CPUC

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. Pacific Gas and Electric Company U39M

Utility type:

ELC       GAS  
 PLC       HEAT       WATER

Contact Person: David Poster

Phone #: (415) 973-1082

E-mail: dxpu@pge.com

### EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas  
PLC = Pipeline      HEAT = Heat      WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2744-G-A/2861-E-A

Subject of AL: Supplement -- Modify Credit Card Pilot Program Memorandum Account and Rule 9 Language

Keywords (choose from CPUC listing): Credit Card Payments

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution: G-3390

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Resolution Required?  Yes  No

Requested effective date: As soon as possible.

No. of tariff sheets: 12

Estimated system annual revenue effect: (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets:

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division

Utility Info (including e-mail)

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

jjr@cpuc.ca.gov and jnj@cpuc.ca.gov

**ATTACHMENT 1  
Advice 2744-G-A**

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
24229-G	Preliminary Statement Part E--Credit Card Pilot Program memorandum Account (CCPPMA)	24075-G
24230-G	Preliminary Statement Part E (Cont.)	24076-G
24231-G	Rule 09--Rendering and Payment of Bills	24077-G
24232-G	Table of Contents -- Preliminary Statements	24078-G
24233-G	Table of Contents -- Rules	24079-G
24234-G	Table of Contents -- Rate Schedules	24228-G

**ATTACHMENT 1  
Advice 2861-E-A**

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
25351-E	Preliminary Statement Part EG--Credit Card Pilot Program Memorandum Account (CCPPMA)	25069-E
25352-E	Preliminary Statement Part EG (Cont.)	25070-E
25353-E	Rule 09--Rendering and Payment of Bills	25071-E
25354-E	Table of Contents -- Rate Schedules	25348-E
25355-E	Table of Contents -- Preliminary Statements	25073-E
25356-E	Table of Contents -- Rules	25072-E



PRELIMINARY STATEMENT  
(Continued)

E. Credit Card Pilot Program Memorandum Account - Gas (CCPPMA-G)

1. PURPOSE:

The purpose of the CCPPMA-G is to track the gas portion of the savings and costs related to the Commission's authorization to commence a pilot credit card payment option for PG&E's customers. Once the pilot program has concluded, the Commission will determine if the savings and costs are cost-neutral or not. If the savings outweigh the costs, the costs and savings are roughly equal, or the Commission, for public policy reasons and in accordance with the legislation (AB 746), determines that the benefits justify a continuation of the program; PG&E will begin full implementation of the credit card program, as authorized by a Commission Decision. If the costs outweigh the savings and the program is not consistent with the legislative objectives, the pilot program will sunset on the date of the Commission Decision.

2. APPLICABILITY:

The CCPPMA-G shall initially apply to all residential customers who use an approved personal credit card, but may be open over the course of the pilot to one or more additional class of customers utilizing an approved personal credit card.

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3. REVISION DATE:

Disposition of the amounts in this account shall be determined in the Annual Gas True-up of Balancing Accounts advice filing, or as otherwise authorized by the Commission.

4. CCPPMA RATES:

The CCPPMA does not have a rate component.

5. ACCOUNTING PROCEDURE:

PG&E will not transfer all or a portion of the balance in the CCPPMA-G to other accounts for future rate recovery until the Commission has reviewed and approved the pilot program costs for recovery upon the conclusion of the 12-month pilot program. Debits and credits of the CCPPMA-G include the following categories:

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a. A credit equal to the gas portion of the estimated savings based on:

- 1) The migration of payments from some higher cost payment channels to lower cost payment channels.
- 2) Avoided check processing fees for those customers who pay by credit card that statistically would have paid by check.
- 3) Customers signing up for PG&E's paperless billing option, e-Bills, will avoid costs associated with paper billing, including postage.
- 4) Avoided postage costs, and/or mileage costs to a payment center which PG&E will attempt to quantify during the course of this pilot program.

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PRELIMINARY STATEMENT  
(Continued)

E. Credit Card Pilot Program Memorandum Account – Gas (CCPPMA-G)

5. ACCOUNTING PROCEDURE: (Cont'd.)

b. A debit equal to the gas portion of charges from:

- 1) The potential for payments to migrate from lower cost options.
- 2) Transaction fees charged by the credit card company and the third-party processor.
- 3) Potential charges associated with investigation and reversal of credit card payments.
- 4) System costs associated with installation and maintenance of any necessary infrastructure and training to support credit card payments.

c. In compliance with Resolution G-3390, PG&E will propose in its report on the pilot program, at the end of the 12-month period, how any long-term, one-time costs associated with installation and maintenance of infrastructure and training should be treated in comparison with savings. Such a comparison will help facilitate the decision on whether to continue with the credit card program.

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d. An entry equal to interest on the average balance in the CCPPMA-G at the beginning of the month and the balance in the account after entries E.5.a and E.5.b above, 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.



RULE 9—RENDERING AND PAYMENT OF BILLS  
(Continued)

E. BILLS DUE ON PRESENTATION

Bills for gas service are due and payable upon presentation. Payments shall be received at the address imprinted on the payment stub attached to PG&E's bill, a business office of PG&E, or by an authorized agent of PG&E. Payments shall be made using the following options:

1. Cash, check, money order, or
2. Electronic data interchange (EDI) for commercial customers or recurring automatic bank debit (Wherein the customer requests the automatic monthly withdrawal of payment for utility services from a designated checking/banking account), or
3. Debit card by phone service or an electronic funds transfer the customer initiates through a third party (A transfer or transaction fee over and above the PG&E bill amount may be charged to the customer by a third-party vendor for these services), or
4. Electronic billing as defined in Rule 1, or
5. a. By other means mutually agreeable to PG&E and the customer.  
 b. A credit card option, on a pilot basis, will be available to customers (1) through a third-party operated pay-by-phone service, which would be available either through a call to PG&E's customer service line or at PG&E's local office; (2) through certain incoming and outgoing calls to or from PG&E; and (3) through PG&E online. Each of these options includes both one-time payments and a recurring billing payment option. Options (1) and (2) are contingent upon the PG&E customer submitting a valid email address and expressly agreeing via email to the suppression of all future paper bills in a manner consistent with the requirements of Rule 9 (L). If a customer opts for a recurring billing payment under option (3), all future paper bills will also be suppressed in accordance with Rule 9 (L). All credit card payment options will initially apply to all residential customers who use an approved personal credit card, but may be open over the course of the pilot to one or more additional class of customers utilizing an approved personal credit card. This program will either continue indefinitely, continue as modified by PG&E or Commission decision, or be terminated by PG&E or the Commission decision rendered at the conclusion of the pilot program.

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PRELIMINARY STATEMENT  
(Continued)

EG. Credit Card Pilot Program Memorandum Account – Electric (CCPPMA-E)

1. PURPOSE:

The purpose of the CCPPMA-E is to track the electric portion of the savings and costs related to the Commission's authorization to commence a pilot credit card payment option for PG&E's customers. Once the pilot program has concluded, the Commission will determine if the savings and costs are cost-neutral or not. If the savings outweigh the costs, the costs and savings are roughly equal, or the Commission, for public policy reasons and in accordance with the legislation (AB 746), determines that the benefits justify a continuation of the program; PG&E will begin full implementation of the credit card program, as authorized by a Commission Decision. If the costs outweigh the savings and the program is not consistent with the legislative objectives, the pilot program will sunset on the date of the Commission Decision.

2. APPLICABILITY:

The CCPPMA shall initially apply to all residential customers who use an approved personal credit card, but may be open over the course of the pilot to one or more additional class of customers utilizing an approved personal credit card.

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3. REVISION DATE:

Disposition of the amounts in this account shall be determined in the Annual Electric True-up Proceeding or other proceeding authorized by the Commission.

4. CCPPMA RATES:

The CCPPMA does not have a rate component.

5. ACCOUNTING PROCEDURE:

PG&E will not transfer all or a portion of the balance in the CCPPMA-E to the Distribution Revenue Adjustment Mechanism (DRAM) or its successor account for future rate recovery until the Commission has reviewed and approved the pilot program costs for recovery upon the conclusion of the 12-month pilot program. Incremental debits and credits of the CCPPMA-E include the following categories:

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a. A credit equal to the electric portion of estimated savings based on:

- 1) The migration of payments from some higher cost payment channels to lower cost payment channels.
- 2) Avoided check processing fees for those customers who pay by credit card that statistically would have paid by check.
- 3) Customers signing up for PG&E's paperless billing option, e-Bills, will avoid costs associated with paper billing, including postage.
- 4) Avoided postage costs, and/or mileage costs to a payment center which PG&E will attempt to quantify during the course of this pilot program.

(Continued)



PRELIMINARY STATEMENT  
(Continued)

EG. Credit Card Pilot Program Memorandum Account - Electric (CCPPMA-E)

5. ACCOUNTING PROCEDURE: (Cont'd.)

b. A debit equal to the electric portion of charges from:

- 1) The potential for payments to migrate from lower cost options.
- 2) Transaction fees charged by the credit card company and the third-party processor.
- 3) Potential charges associated with investigation and reversal of credit card payments.
- 4) System costs associated with installation and maintenance of any necessary infrastructure and training to support credit card payments.

c. In compliance with Resolution G-3390, PG&E will propose in its report on the pilot program, at the end of the 12-month period, how any long-term, one-time costs associated with installation and maintenance of infrastructure and training should be treated in comparison with savings. Such a comparison will help facilitate the decision on whether to continue with the credit card program.

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(N)

d. An entry equal to interest on the average balance in the CCPPMA-E at the beginning of the month and the balance in the account after entries EG.5.a and EG.5.b above, 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.



RULE 9—RENDERING AND PAYMENT OF BILLS  
(Continued)

E. BILLS DUE ON PRESENTATION

Bills for electric service are due and payable upon presentation. Payments shall be received at the address imprinted on the payment stub attached to PG&E's bill, a business office of PG&E, or by an authorized agent of PG&E. Payments shall be made using the following options:

1. Cash, check, money order, or
2. Electronic data interchange (EDI) for commercial customers or recurring automatic bank debit (Wherein the customer requests the automatic monthly withdrawal of payment for utility services from a designated checking/banking account), or
3. Debit card by phone service or an electronic funds transfer the customer initiates through a third party (A transfer or transaction fee over and above the PG&E bill amount may be charged to the customer by a third-party vendor for these services), or
4. Electronic billing as defined in Rule 1, or
5.
  - a. By other means mutually agreeable to PG&E and the customer.
  - b. A credit card option, on a pilot basis, will be available to customers (1) through a third-party operated pay-by-phone service, which would be available either through a call to PG&E's customer service line or at PG&E's local office; (2) through certain incoming and outgoing calls to or from PG&E; and (3) through PG&E online. Each of these options includes both one-time payments and a recurring billing payment option. Options (1) and (2) are contingent upon the PG&E customer submitting a valid email address and expressly agreeing via email to the suppression of all future paper bills in a manner consistent with the requirements of Rule 9 (L). If a customer opts for a recurring billing payment under option (3), all future paper bills will also be suppressed in accordance with Rule 9 (L). All credit card payment options will initially apply to all residential customers who use an approved personal credit card, but may be open over the course of the pilot to one or more additional class of customers utilizing an approved personal credit card. This program will either continue indefinitely, continue as modified by PG&E or Commission decision, or be terminated by PG&E or the Commission decision rendered at the conclusion of the pilot program.

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If a Customer makes only partial payment on a bill, the partial payment received will be allocated among the following components of the bill in proportion to the amount owed on each (utility users taxes will be treated in accordance with current utility procedures and are not subject to this section). The bill components include PG&E charges, FTA charges, CTC charges, and other energy-related charges. Customer failure to pay any of the components set forth herein will be subject to service termination as set forth in Rule 11.

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**3/20/06 WORKSHOP FOR AB 746: CREDIT CARD PAYMENTS  
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Filing List  
General Order 96-A, Section III(G)**

ABAG Power Pool	DGS Natural Gas Services	PG&E National Energy Group
Accent Energy	Douglass & Liddell	Pinnacle CNG Company
Aglet Consumer Alliance	Downey, Brand, Seymour & Rohwer	PITCO
Agnews Developmental Center	Duke Energy	Plurimi, Inc.
Ahmed, Ali	Duke Energy North America	PPL EnergyPlus, LLC
Alcantar & Elsesser	Duncan, Virgil E.	Praxair, Inc.
Ancillary Services Coalition	Dutcher, John	Price, Roy
Anderson Donovan & Poole P.C.	Dynergy Inc.	Product Development Dept
Applied Power Technologies	Ellison Schneider	R. M. Hairston & Company
APS Energy Services Co Inc	Energy Law Group LLP	R. W. Beck & Associates
Arter & Hadden LLP	Energy Management Services, LLC	Recon Research
Avista Corp	Exelon Energy Ohio, Inc	Regional Cogeneration Service
Barkovich & Yap, Inc.	Exeter Associates	RMC Lonestar
BART	Foster Farms	Sacramento Municipal Utility District
Bartle Wells Associates	Foster, Wheeler, Martinez	SCD Energy Solutions
Blue Ridge Gas	Franciscan Mobilehome	Seattle City Light
Bohannon Development Co	Future Resources Associates, Inc	Sempra
BP Energy Company	G. A. Krause & Assoc	Sempra Energy
Braun & Associates	Gas Transmission Northwest Corporation	Sequoia Union HS Dist
C & H Sugar Co.	GLJ Energy Publications	SESCO
CA Bldg Industry Association	Goodin, MacBride, Squeri, Schlotz &	Sierra Pacific Power Company
CA Cotton Ginners & Growers Assoc.	Hanna & Morton	Silicon Valley Power
CA League of Food Processors	Heeg, Peggy A.	Smurfit Stone Container Corp
CA Water Service Group	Hitachi Global Storage Technologies	Southern California Edison
California Energy Commission	Hogan Manufacturing, Inc	SPURR
California Farm Bureau Federation	House, Lon	St. Paul Assoc
California Gas Acquisition Svcs	Imperial Irrigation District	Stanford University
California ISO	Integrated Utility Consulting Group	Sutherland, Asbill & Brennan
Calpine	International Power Technology	Tabors Caramanis & Associates
Calpine Corp	Interstate Gas Services, Inc.	Tecogen, Inc
Calpine Gilroy Cogen	IUCG/Sunshine Design LLC	TFS Energy
Cambridge Energy Research Assoc	J. R. Wood, Inc	Transcanada
Cameron McKenna	JTM, Inc	Turlock Irrigation District
Cardinal Cogen	Luce, Forward, Hamilton & Scripps	U S Borax, Inc
Cellnet Data Systems	Manatt, Phelps & Phillips	United Cogen Inc.
Chevron Texaco	Marcus, David	URM Groups
Chevron USA Production Co.	Matthew V. Brady & Associates	Utility Cost Management LLC
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City of Healdsburg	McKenzie & Associates	Western Hub Properties, LLC
City of Palo Alto	Meek, Daniel W.	White & Case
City of Redding	Mirant California, LLC	WMA
CLECA Law Office	Modesto Irrigation Dist	
Commerce Energy	Morrison & Foerster	
Constellation New Energy	Morse Richard Weisenmiller & Assoc.	
CPUC	Navigant Consulting	
Cross Border Inc	New United Motor Mfg, Inc	
Crossborder Inc	Norris & Wong Associates	
CSC Energy Services	North Coast Solar Resources	
Davis, Wright, Tremaine LLP	Northern California Power Agency	
Defense Fuel Support Center	Office of Energy Assessments	
Department of the Army	OnGrid Solar	
Department of Water & Power City	Palo Alto Muni Utilities	