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September 8, 2006

Advice 2883-E-A

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Revision to Modified Tariff – Costs Deemed Reasonable
Subaccount in Generation Divestiture Transaction Costs
Memorandum Account (Preliminary Statement AE)**

Pacific Gas and Electric Company (PG&E) hereby submits this supplemental filing for revisions to its electric tariffs.

Purpose

PG&E files this supplemental advice letter to allow for the Generation Divestiture Transaction Cost Memorandum Account (GDTTCMA) to be transferred to all 3 subaccounts of the Modified Transition Cost Balancing Account (MTCBA), including the Bundled/Direct Access (DA) subaccount, the Customer Generation Subaccount, and the Municipal Departing Load Subaccount, as authorized by the Commission. PG&E inadvertently requested to allow the GDTTCMA to be transferred to only the Bundled and DA subaccount when Advice 2883-E was filed. PG&E is filing this supplement to ensure that these costs are recovered from all eligible customers.

PG&E filed Advice 2883-E on August 15, 2006 to provide a vehicle to recover \$11.35 million dollars in principal transaction costs already deemed reasonable by the CPUC and related on-going interest¹ associated with the market valuing of its hydro generation facilities during the September 2000 through June 2001 time frame. PG&E proposed to do this by transferring this \$11.35 million dollars in principal and related interest from the Costs Deemed Reasonable subaccount of

¹ Interest on the \$11.35 million principal balance through June 30, 2006 was \$2.7 million.

the GDTCA, which does not have its own rate component, to the Bundled and DA Ongoing CTC subaccount of the MTCBA.²

In accordance with Decision (D.) 03-02-028, PG&E is now adding tariff language that will allow for the transfer of the principal and related interest from the Costs Deemed Reasonable subaccount of the GDTCA to not only the Bundled and DA Ongoing CTC subaccount of the MTCBA, but also the Customer Generation subaccount and the Municipal Departing Load subaccount of the MTCBA as well. These costs were incurred as part of electric industry restructuring, and as such should be recovered from all customers. The new language that PG&E is proposing in the GDTCA and MTCBA preliminary statements attached to this advice letter will allow for this transfer. Upon approval of PG&E's June 2006 ERRA application, the MTCBA balance will be consolidated in the January 1, 2007 rate change proposed in PG&E's December supplement to its Annual Electric True-Up (AET) Advice Letter.

Tariff Revisions

This advice letter proposes to make tariff modifications to the GDTCA to enable PG&E to recover the remaining \$11.35 million principal balance plus related interest. Upon approval of this advice letter, PG&E proposes to transfer this \$11.35 million principal balance plus related interest to the Bundled and DA Ongoing CTC subaccount, the Customer Generation subaccount, and the Municipal Departing Load subaccount of the MTCBA, the successor account to the Transition Cost Balancing Account ("TCBA").³ Upon approval of PG&E's June 2006 ERRA application, the MTCBA will be consolidated in the CTC rate effective January 1, 2007 through PG&E's Annual Electric True-Up advice letter.

PG&E requests that the tariffs being submitted in this filing supersede the tariffs from Advice 2883-E.

Protests

Anyone wishing to protest this filing may do so by sending a letter by **September 28, 2006**, 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:

² The MTCBA is being proposed as the recovery balancing account since it is the successor account to the Transition Cost Balancing Account. See further discussion below in "Tariff Revisions" section.

³ The Commission instituted the TCBA pursuant to P.U. Code Section 367 which, among other things, required the Commission to "identify and determine those costs and categories of costs" recoverable as "transition costs," defined in P.U. Code Section 840(f).

CPUC Energy Division
Attention: Tariff Unit, 4th Floor
505 Van Ness Avenue
San Francisco, California 94102
Facsimile: (415) 703-2200
E-mail: jjr@cpuc.ca.gov and jnj@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 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 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

Effective Date

PG&E requests that this advice filing become effective on **October 8, 2006**, which is 30 days from the date of this 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. 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 Revisions

cc: GO 96-A Service List
Don Lafrenz, Energy Division

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) #: 2883-E-A

Subject of AL: Revision to Modified Tariff – Costs Deemed Reasonable Subaccount in Generation Divestiture Transaction Costs Memorandum Account (Preliminary Statement AE)

Keywords (choose from CPUC listing): Tariff Revisions, Electric

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution: D.03-02-028

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

Summarize differences between the AL and the prior withdrawn or rejected AL: _____

Resolution Required? Yes No

Requested effective date: 10/8/2006

No. of tariff sheets: 8

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 proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

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

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

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

Utility Info (including e-mail)

**ATTACHMENT 1
Advice 2883-E-A**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
25343-E	Preliminary Statement Part AE--Generation Divestiture Transaction Costs Memorandum Account	19902-E
25344-E	Preliminary Statement Part CQ--Modified Transition Cost Balancing Account	24757-E
25345-E	Preliminary Statement Part CQ (Cont.)	24328-E
25346-E	Preliminary Statement Part CQ (Cont.)	24329-E
25347-E	Preliminary Statement Part CQ (Cont.)	24758-E
25348-E	Table of Contents -- Rate Schedules	25169-E
25349-E	Table of Contents -- Preliminary Statements	25170-E
25350-E	Table of Contents -- Preliminary Statements	25171-E



PRELIMINARY STATEMENT
(Continued)

AE. GENERATION DIVESTITURE TRANSACTION COSTS MEMORANDUM ACCOUNT (GDTCTMA)

1. **PURPOSE:** The purpose of the GDTCTMA is to record transaction costs incurred by PG&E associated with the divestiture of its generation facilities. The divestiture is being undertaken in accordance with Decision 95-12-063, as modified by Decision 96-01-009, Assembly Bill 1890, and Decision 03-02-028. Costs recorded in the GDTCTMA include all transaction costs including, but not limited to, investment banker fees and commissions, environmental impact reports and audits, outside legal support for regulatory proceedings and sales negotiations. Costs recorded in the GDTCTMA shall exclude any PG&E labor expenses.
2. **APPLICABILITY:** The GDTCTMA shall apply to all customer classes, except for those specifically excluded by the Commission.
3. **GDTCTMA RATES:** The GDTCTMA does not currently have a rate component.
4. **ACCOUNTING PROCEDURE:** The GDTCTMA consists of the following two Subaccounts:

Unreviewed Costs Subaccount: to record all transition costs incurred by PG&E associated with divestiture of its generations facilities, and not yet approved by the Commission for recovery.

Costs Deemed Reasonable Subaccount: to record transition costs associated with divestiture of its generation facilities, approved as reasonable by the Commission for recovery.

PG&E shall maintain this GDTCTMA by making entries to each subaccount as follows:

a. Unreviewed Costs Subaccounts:

- 1) A debit entry equal to PG&E's recorded transaction costs associated with the divestiture of generation facilities.
- 2) A debit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, 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.

b. Costs Deemed Reasonable Subaccounts:

- 1) A debit entry equal to the amount associated with the divestiture of generation facilities approved by the Commission as reasonable in Decision 03-02-028, but deferred for recovery.
- 2) A one-time credit entry to transfer the balance in the Costs Deemed Reasonable Subaccount to the following three subaccounts of the MTCBA: Bundled and DA Ongoing CTC Subaccount, the Customer Generation Departing Load Ongoing CTC Subaccount, and the Municipal Departing Load Ongoing CTC Subaccount, as authorized by the Commission. (N)
|
|
(N)
- 3) A debit entry equal to the 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.

5. **FINANCIAL REPORTING:** PG&E may, at its discretion, record the balance in the GDTCTMA as a deferred debit on its balance sheet with entries to the appropriate income statement accounts, as necessary.

PG&E may request recovery of the balance in the GDTCTMA by separate application to the Commission, or by any other means deemed appropriate by the Commission.



PRELIMINARY STATEMENT
(Continued)

CQ. MODIFIED TRANSITION COST BALANCING ACCOUNT (MTCBA)

5. ACCOUNTING PROCEDURE: (Cont'd.)

a. Bundled and DA Ongoing CTC Subaccount: (Cont'd.)

- 3) A debit entry equal to 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.
- 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.3 above), and the final Commission-approved net present value of the restructured QF contract and to adjust the interest computation in Item 5.a.10. below for the effect of the true-up.
- 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).
- 6) A one-time debit entry equal to the balance in the ERCA CTC subaccount as authorized by the Commission.
- 7) A one-time debit entry equal to bundled and DA customers' share of the balance in the Costs Deemed Reasonable subaccount of the GDTCSMA as authorized by the Commission.

(N)
|
(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 account:

- 8) A debit entry equal to the above-market 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:

- 9) 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.
- 10) 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.

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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.
- 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.
- 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.
- 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.9. below for the effect of the true-up.
- 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).
- 6) A one-time debit entry equal to CGDL customers' share of the balance in the Costs Deemed Reasonable subaccount of the GDTDMA as authorized by the Commission. (N)
(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:

- 7) 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.
- 8) A credit entry equal to negative above-market costs that are applied to positive above-market costs in the Negative Ongoing Competition Transition Charge Memorandum Account (NOCTDMA).

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

- 9) 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.
- 10) 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.

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PRELIMINARY STATEMENT
(Continued)

CQ. MODIFIED TRANSITION COST BALANCING ACCOUNT (MTCBA)

5. ACCOUNTING PROCEDURE: (Cont'd.)

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.9. 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).
- 6) A one-time debit entry equal to MDL customers' share of the balance in the Costs Deemed Reasonable subaccount of the GDTCSMA as authorized by the Commission. (N)
(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:

- 7) 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.
- 8) A credit entry equal to negative above-market costs that are applied to positive above-market costs in the Negative Ongoing Competition Transition Charge Memorandum Account (NOCTCSMA).

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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:

- 9) 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.
- 10) 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.

(Continued)



TABLE OF CONTENTS

		<u>CAL P.U.C. SHEET NO.</u>	
Title Page		8285-E	
Table of Contents:			
Rate Schedules	24603,25050,24961,25043-E		
Preliminary Statements	25155,25025,25349,25350-E		(T)
Rules	25154-E		
Maps, Contracts and Deviations	23053-E		
Sample Forms	25013,24993,24994,24958,19236,25042,10572,23225-E		

RATE SCHEDULES

<u>SCHEDULE</u>	<u>TITLE OF SHEET</u>	<u>CAL P.U.C. SHEET NO.</u>
RESIDENTIAL RATES		
E-1	Residential Service	24768,24769,24770,19910,24771,24772-E
E-2	Experimental Residential Time-of-Use Service	
E-3	Experimental Residential Critical Peak Pricing Service	22429,24773,24774,24775, 24776,24087,24777,24089,24778,23082,22501,21243,24779,22437,24780-E
EE	Service to Company Employees	24091-E
EM	Master-Metered Multifamily Service	24781,24782,24783,20648,24784,24785-E
ES	Multifamily Service	24786,24787,24788,23640,24789,24790-E
ESR	Residential RV Park and Residential Marina Service	24791,24792,24793,20657,24794,24795-E
ET	Mobilehome Park Service	24796,24797,24343,24798,24799,24800-E
E-6	Residential Time-of-Use Service	24801,24802,24803,24804,24805,24806-E
E-7	Residential Time-of-Use Service	24808,24809,24810,24811,24344,24812-E
E-A7	Experimental Residential Alternate Peak Time-of-Use Service	21274,24813,24814,24855,24815,24816-E
E-8	Residential Seasonal Service Option	24817,24818,24546,24819-E
E-9	Experimental Residential Time-of-Use Service for Low Emission Vehicle Customers	24820,24821,24822,24823,24824,24825,21289,24826,24827-E
EL-1	Residential CARE Program Service	24118,24828,24829,24348,24830-E
EML	Master-Metered Multifamily CARE Program Service	24349,24667,21299,24123,22170-E
ESL	Multifamily CARE Program Service	24668,24669,21598,24351,24352,21307-E
ESRL	Residential RV Park and Residential Marina CARE Program Service	24670,24671,21599,24353,24354,21313-E
ETL	Mobilehome Park CARE Program Service	24672,24673,21600,22180,24355,21319-E
EL-6	Residential CARE Program Time-of-Use Service	24849,24850,24851,24852,24853,24854-E
EL-7	Residential CARE Program Time-of-Use Service	21320,24133,24674,21601,24356,21325-E
EL-A7	Experimental Residential CARE Program Alternate Peak Time-of-Use Service	21326,24357,24675,19783,24358,21330-E
EL-8	Residential Seasonal CARE Program Service Option	24359,24676,24360,22190-E
E-FERA	Family Electric Rate Assistance	23963,24996,21643-E
COMMERCIAL/INDUSTRIAL		
A-1	Small General Service	24677,24678,24361,24362,21339-E
A-6	Small General Time-of-Use Service	22755,23445,24679,24680,21343,24363,21345-E
A-10	Medium General Demand-Metered Service	24148,24681,24682,24683,24684,22757,22874,24364,24365,21354,21355-E
A-15	Direct-Current General Service	24685,24686,24366,24157-E

(Continued)



TABLE OF CONTENTS
(Continued)

PRELIMINARY STATEMENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Part A	Description of Service Area & General Requirements	12081 to 12090,17048-E
Part B	Not Being Used	
Part C	Not Being Used	
Part D	Energy Efficiency California Energy Commission Memorandum Account.....	18604-E
Part E	CPUC Reimbursement Fee	21604-E
Part F	Helms Adjustment	11995-E
Part G	Catastrophic Event Memorandum Account	18998,11740-E
Part H	Interest	10579-E
Part I	Rate Schedule Summary	24078,24079-E
Part J	Income Tax Component of Contributions Provision	11752,11503-E
Part K	Energy Commission Tax	24297-E
Part L	Electric Restructuring Costs Accounts	16515 to 16517-E
Part M	California Alternate Rates for Energy Account.....	18601-E
Part N	Not Being Used	
Part O	Not Being Used	
Part P	Customer Energy Efficiency Adjustment	15104,15095,15097,15105,15106-E
Part Q	Competition Transition Charge Responsibility.....	14028-E
Part R	Affiliate Transfer Fees Account.....	16532-E
Part S	Hazardous Substance Mechanism.....	18999,15720,13540,13419 to 13421-E
Part T	Qualifying Facility Contribution in Aid of Construction Memorandum Account.....	13426-E
Part U	Capital Audit Consultant Cost Memorandum Account	17993-E
Part V	Not Being Used	
Part W	Not Being Used	
Part X	Not Being Used	
Part Y	Electric and Magnetic Field Measurement Policy.....	13399-E
Part Z	Electric Vehicle Balancing Account.....	21664-E
Part AA	Not Being Used	
Part AB	Not Being Used	
Part AC	Not Being Used	
Part AD	Transition Cost Audit Memorandum Account.....	15917-E
Part AE	Generation Divestiture Transaction Costs Memorandum Account.....	25343-E (T)
Part AF	Not Being Used	
Part AG	Not Being Used	
Part AH	Not Being Used	
Part AI	Not Being Used	
Part AJ	Not Being Used	
Part AK	Low Income Energy Efficiency Memorandum Account	19227-E

(Continued)



TABLE OF CONTENTS
(Continued)

PRELIMINARY STATEMENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Part CA	Food Service Technology Center Memorandum Account	18781-E
Part CB	DWR/ISO Cost Balancing Account	20500-E
Part CC	Real Time Energy Metering Memorandum Account.....	18307,18308-E
Part CD	Kern Restoration and Operation Memorandum Account.....	18509-E
Part CE	Baseline Balancing Account.....	23410,23411-E
Part CF	Net Energy Metering Memorandum Account	18831-E
Part CG	Utility Generation Balancing Account	24735,24736-E
Part CH	Utility Retained Generation income Tax Memorandum Account.....	20502-E
Part CI	Wholesale DWR/ISO Cost Memorandum Account	20503-E
Part CJ	Not Being Used	
Part CK	Distribution Bypass Deferral Rate Memorandum Account	20619-E
Part CL	Distributed Energy Resources Memorandum Account.....	19042-E
Part CM	Bond Charge Balancing Account	20245,19556-E
Part CN	Research, Development, and Demonstration Balancing Account	19371-E
Part CO	Renewables Balancing Account.....	19372-E
Part CP	Energy Resource Recovery Account	23762,23998,23999-E
Part CQ	Modified Transition Cost Balancing Account.....	24756,25344,25345,25346,25347-E
Part CR	Common Area Balancing Account	19768,19769-E
Part CS	Advanced Metering and Demand Response Account.....	24737,24738,24739-E
Part CT	Direct Access Shortfall Account.....	22416-E
Part CU	Customer Credit Holding Account.....	21533-E
Part CV	Financial Hedging Memorandum Account	20631-E
Part CW	Not Being Used	
Part CX	Not Being Used	
Part CY	EI Paso Settlement Electric Memorandum Account.....	20985-E
Part CZ	Distribution Revenue Adjustment Mechanism.....	24740,24043-E
Part DA	Public Purpose Program Revenue Adjustment Mechanism.....	22719-E
Part DB	Nuclear Decommissioning Adjustment Mechanism	22720-E
Part DC	Not Being Used	
Part DD	Regulatory Asset Tax Balancing Account	21498-E
Part DE	Headroom Account	21122-E
Part DF	Electric Reimbursable Fees Balancing Account.....	22722-E
Part DG	DWR Power Charge Balancing Account.....	23266-E
Part DH	Electric Credit Facilities Fees Tracking Account	21125-E
Part DI	Procurement Energy Efficiency Balancing Account	25023-E

(T)

(Continued)

**PG&E Gas and Electric Advice
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
Childress, David A.	Maynor, Donald H.	Utility Resource Network
City of Glendale	McKenzie & Assoc	Wellhead Electric Company
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	