

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 3, 2007

Advice Letter 3147-E

Brian K. Cherry
Vice President, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

Subject: Request Approval to Disburse Funds from the Humboldt Bay
Power Plant Unit 3 Nuclear Decommissioning Trusts

Dear Mr. Cherry:

Advice Letter 3147-E is effective December 1, 2007.

Sincerely,

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

Sean H. Gallagher, Director
Energy Division



November 1, 2007

Advice 3147-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Request Approval to Disburse Funds from the Humboldt Bay
Power Plant Unit 3 Nuclear Decommissioning Trusts**

Purpose:

Pacific Gas and Electric Company (PG&E) hereby requests approval of its proposal to disburse up to \$31.9 million from the Humboldt Bay Unit 3 Nuclear Decommissioning Master Trusts (Trusts).

This request is for additional decommissioning work at Humboldt Bay Power Plant Unit 3 (HBPP Unit 3 or Humboldt Bay) for: 1) disposal of Class B & C radioactive waste (\$8.1 million); 2) disposal of Class A radioactive waste (\$0.7 million); 3) facility modifications (\$0.9 million); 4) purchase of a Greater Than Class C storage container (\$1.1 million); 5) operation of the Independent Spent Fuel Storage Installation (\$4.0 million); 6) removal of equipment and piping from reactor feed pump room, turbine generator/condenser, and condenser pipe tunnel for packaging of radioactive waste (\$13.1 million); 7) increase escalation on the dry cask storage system (\$1.3 million); and 8) preparatory decommissioning activities to be performed from 2008 through 2009 while maintaining NRC SAFSTOR status (\$2.7 million). A detailed discussion of these scopes of work is in Attachment 1. A reconciliation between the scopes of work outlined here and the topics covered in Attachment 1 is in Attachment 2.

This filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any rate schedule rule.

Due to the need to perform these activities on a timely basis, PG&E respectfully requests the California Public Utilities Commission (CPUC or the Commission) to act on this request at the earliest possible date.

Background

HBPP Unit 3 is a 65 megawatt boiling water reactor that began commercial operation in 1963, ceased operation in 1976, and was placed in the SAFSTOR custodial mode in 1988 to await final decommissioning.

The Trusts were established in CPUC Decision (D.)85-12-022, to allow PG&E “to recover from its ratepayers the cost of decommissioning the prudently constructed plant at Humboldt Bay Power Plant Unit 3.” Funds for the Trusts were collected from PG&E’s ratepayers from 1988 through 1991 and from 2003 through 2009 per CPUC D.07-01-003 approving PG&E’s 2005 Nuclear Decommissioning Cost Triennial Proceeding (NDCTP) Application (A.)05-11-009. As of December 31, 2006, the Trusts had a liquidation value of \$289.6 million, a market value of \$304.4 million, and an expense-equivalent value of \$360.1 million.¹

The \$31.9 million requested in this filing represents approximately 10 percent of the total current value of the trusts. PG&E customers will see no change in their rates as a result of drawing upon the Trusts for these activities. The types of activities outlined in this advice letter were included in the TLG Decommissioning Cost Estimate filed in PG&E’s 2005 NDCTP Application 05-11-009. These scopes of work are distinct from the operations and maintenance activities performed under SAFSTOR.

Approximately \$8.8 million of this request is consistent with the recommendations of intervenors in the 2005 NDCTP that PG&E dispose of Humboldt Bay Class B and C radioactive waste prior to the closure of the Barnwell Low Level Waste Disposal facility to Non-Atlantic Compact members. At the time of the 2005 NDCTP hearings, Barnwell had stated that all space post-June 2007 had already been reserved by other Non-Atlantic Compact utilities and HBPP was not sure it could have shipments ready in time to meet a June 2007 deadline. After the 2005 NDCTP Settlement, however, Barnwell notified HBPP that there was space available through June 2008 for additional shipments of Class B and C Low Level Radioactive Waste (LLRW), although Barnwell is closing to Non-Atlantic Compact area waste shippers as of June 30, 2008. In an effort to avoid maintenance and storage of this waste on-site, it is prudent that PG&E ship the Humboldt Bay material no later than March 30, 2008. Therefore, in order to avoid burdening customers and the community surrounding Humboldt Bay with the uncertainty of finding alternative storage for the waste to be shipped to Barnwell, PG&E makes the request described herein.

Other expenditures included in this request are in anticipation of full decommissioning and to enable PG&E to accelerate the transition from

¹ The liquidation value of the trusts reflects the amount available, after taxes, to pay for nuclear decommissioning projects.

SAFSTOR by accomplishing preparatory work, such as decommissioning areas for packaging waste material in a safe, compliant, and prudent manner.

The scopes of work being requested in this Advice Letter are consistent with the recommendations of intervenors during the 2005 NDCTP hearings, and/or were recommended by Enercon Services, Inc.,² in two documents it prepared for HBPP: 1) HBPP Accelerated Strategic Plan Implementation Technical Approach and Cost Estimate Immediate Phase dated June 29, 2007 and 2) 2007 Assessment Facility Modification Plan dated August 30, 2007. The cost estimates herein are current. However, PG&E will update the Commission in future NDCTP filings with the actual cost or revised estimates of these decommissioning activities based on new information made available subsequent to this request. PG&E will establish and maintain separate accounting procedures to record costs of these activities, and the related transactions with the Trusts, to permit cost monitoring.

This request is for an advance withdrawal from the Trusts to cover decommissioning costs, as approved on May 25, 2006, Item 11.3, page 7 of 10 in the "PG&E, DRA, and TURN Final Settlement Agreement" of the 2005 NDCTP. PG&E will be submitting a filing in late 2008 to use additional funds and commence decommissioning activities at HBPP Unit 3 pursuant to § 2.01(5) of the Trust.

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 **November 21, 2007**, which is 20 days after the date of this filing. Protests should be mailed to:

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: jj@cpuc.ca.gov and mas@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.

² Enercon Services, Inc. is a consulting firm specializing in engineering, licensing, and analysis hired by PG&E.

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:

Brian K. Cherry
Vice President, Regulatory Relations
Pacific Gas and Electric Company
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

Due to the immediate need to perform these activities, PG&E respectfully requests the Commission to act on this request at the earliest possible date. PG&E requests that this advice filing become effective on **December 1, 2007**, which is 30 days from the date of this filing.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list as well as those on Service Lists – A.05-11-008 and A.05-11-009. 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: Proposed Project Activities and Costs

Attachment 2: Category Reconciliation to Advice Letter 3147-E

Cc: Service Lists – A.05-11-008; A.05-11-009
Honorable Patty Berg, California Assembly
Redwood Alliance

ATTACHMENT 1
ADVICE LETTER 3147-E

Proposed Project Activities and Costs

Disposal of Class B and C Radioactive Waste

HBPP has appreciable quantities of Class B and C radioactive waste having a wide range of both physical and radiological characteristics. PG&E has determined that it will be beneficial for both operational and financial reasons to dispose of this material as soon as reasonably possible. The total projected cost to package, transport and dispose of the subject waste, including the potential use of both onsite and offsite vendors, is estimated to be \$7.5 million.

Disposal Site Access: Currently, Class B and C radioactive waste may only be disposed of at the Barnwell Waste Management Facility in Barnwell, South Carolina. Pursuant to South Carolina state law, the Barnwell Waste Management Facility will close to generators located outside of the Atlantic Radioactive Waste Compact on June 30, 2008. HBPP is located outside of the Atlantic Radioactive Waste Compact. Following June 30, 2008, there will be no access for the disposal of Class B and C radioactive waste within the United States and no such capacity is anticipated in either the near or long-term future. In order to dispose of HBPP's existing Class B and C radioactive waste, PG&E must obtain permission from the South Carolina Budget and Control Board (the government agency responsible for the Barnwell Waste Management Facility) to dispose of the requisite volume of material.

Physical Characteristics of HBPP Waste: HBPP's Class B and C radioactive waste includes several different physical forms. An appreciable amount of HBPP's Class B and C radioactive waste is organic ion exchange resin. This material is not suited for long-term or indefinite storage because as the organic material ages and degrades, it is susceptible to generating explosive gases including methane and hydrogen. Accordingly, disposal prior to the closure of the Barnwell Waste Management Facility is desirable.

Radiological Characteristics of HBPP Waste: Class B and C radioactive waste is inherently more concentrated than Class A waste. As such, dose rates and other radiological considerations make it desirable to remove this material from the HBPP site.

Security Requirements: Appreciable quantities of HBPP's Class B and C radioactive waste are comprised of radioisotopes constituting Special Nuclear Material (SNM). Federal regulations prescribe extensive security requirements when a licensee possesses SNM above certain threshold limits. Disposal of HBPP's Class B and C radioactive waste may enable PG&E to substantially reduce its security program and costs.

Burial of the Spent Fuel Pool (SFP) Irradiated Hardware

Funding for this project was requested in Advice Letter 2876-E and approved by the CPUC in Resolution E-4025 for \$921,000. At the time of the request for funding, the plan was to package the waste material using methods standard at other commercial nuclear plants based on preliminary discussions with the selected contractor who has performed many of these type shipments with minimal involvement of HBPP staff. As detailed planning with the selected contractor proceeded it became apparent that significant plant support from both HBPP staff and temporary additions would be necessary due to the complexity of processing the material, and the need to address alpha contamination issues including the preparation for shipment and shipment documentation requirements. In addition, a change in the type of processing equipment the contractor was planning to use resulted in project delays and increased costs. This scope of work is estimated at \$0.6 million.

Disposal of Class A Radioactive Waste

This work is required to create adequate working space in preparation for future decommissioning activities in Unit 3. This project is scheduled to package, ship, and dispose of the radioactive material at Energy Solutions (Clive, Utah) by the end of 2007. There is a significant quantity of waste being developed at Humboldt Bay Power Plant Unit 3 (HBPP Unit 3) during decommissioning activities. This waste is composed of contaminated soils/asphalt from the Unit 3 yard and other contaminated items (used tools, hoses, and similar items). This request excludes the abandoned equipment (control rod drive hydraulic pumps and related piping and controls, the reactor poison tank and related piping and controls, the reactor water cleanup heat exchanger resin tank and related piping and controls, the spent fuel energy absorber, and the service cooling water heat exchangers and related piping and controls) that were authorized in Commission Resolution E-4025 dated October 5, 2006. Energy Solutions provided a price significantly less than the pricing in the 2005 Nuclear Decommissioning Cost Triennial Proceeding (NDCTP) D.07-01-003 to transport and dispose of all the legacy waste and the soils from ISFSI excavations. This scope of work is estimated at \$0.7 million.

During the 2005 NDCTP hearings, intervenors recommended that Class B and C LLRW be shipped to Barnwell prior to its closure to Non-Atlantic Compact states. This same logic applies to Class A waste to be disposed of at Energy Solutions in Clive, Utah.

Decommission Areas for Packaging Waste Material in Preparation for Shipment

It has become evident that indoor locations for packaging waste material in preparation for shipment are required. Four areas have been identified to

provide these packaging locations; 1) hot machine shop, 2) turbine generator/condenser area, 3) reactor feed pump room, and 4) condenser pipe tunnel. These facilities, however, contain many items that occupy usable space. These are contaminated items that can be disposed of at Energy Solution's Clive, Utah disposal site. Removal of the equipment associated with the areas mentioned above to prepare the remaining areas as radwaste packaging and staging areas is considered a prudent and effective project at this time. Removal and disposal of this equipment and the reuse of the remaining areas is the most cost effective method for providing an enclosed, shielded, airborne monitored and ventilated area required for radwaste packaging. No new structures will be built onsite, and radioactive components and equipment in current areas will be removed and disposed of at a licensed radioactive waste disposal site. The remaining area will meet and/or exceed the requirements for the safe packaging of radioactive waste. This scope of work, based on the TLG Decommissioning Cost Estimate, is estimated at \$13.1 million.

Breakdown by location:

Hot machine shop	\$0.1 million
Turbine Generator/Condenser area	\$9.5 million
Reactor Feed Pump room	\$0.4 million
Condenser Pipe Tunnel	\$3.1 million

Operation and Maintenance of the ISFSI

The used fuel at Humboldt Bay will be moved from the Spent Fuel Pool to the Independent Spent Fuel Storage Installation (ISFSI) during the first half of 2008. With the placement of the first cask at the ISFSI, the operation and maintenance (O&M) associated with the ISFSI will begin. PG&E's Advice Letter 2565-E, which the CPUC approved in Resolution E-3912 on February 24, 2005, included only the costs through the loading and transporting of the casks to the ISFSI. The costs for O&M of the ISFSI, security at the ISFSI, NRC fees, and NRC inspections for the next two years after fuel is moved to the ISFSI is estimated at \$4.0 million. In 2008, PG&E plans to request the release of the Trusts funds for full decommissioning activities, for approval from the CPUC in 2009.

Purchase Greater Than Class C Radiological Waste Cask

The need for a Greater than Class C (GTCC) cask for the disposal of this type of radioactive waste has been confirmed through analysis of the reactor vessel and other areas of HBPP. There is approximately a two year lead time for fabrication and delivery of this type of cask, which was included in the original dry cask system proposal from Holtec International as an option. Therefore, it is prudent to request the vendor (Holtec International) to proceed with the fabrication of the GTCC cask as soon as possible. This scope of work is estimated at \$1.1 million.

Cross Contamination Plan

Long term goals at the Humboldt Bay site include decommissioning to support the termination of the Unit 3 NRC license and long term operation of the new generation power plant. Previous characterization studies establish that the surface and subsurface footprints of the new generation facility and the ISFSI site are minimally impacted by historical site radiological activities and therefore there is minimal risk of later discovering radiological contamination in these areas. To ensure that the underlying soils and the structures and equipment associated with these two facilities remain free of cross-contamination during the site decommissioning process, a study must be initiated to define cross-contamination control measures. These measures include environmental air samplers, tritium monitoring wells, and standard administrative practices to increase the level of assurance and provide documentation to prove the site activities are being conducted in a manner that will allow the release of the NRC license.

For Environmental Air Sampling, the addition of environmental sampling stations for detection of an airborne release of radiological material would provide independent monitoring against airborne contamination and an indication of the direction and concentration of any significant release in order to determine appropriate remediation. The recommended sampling system would be an enclosed sampling system designed to work under severe environmental conditions and provide continuous sampling with minimal maintenance.

In 2006, the Humboldt Bay Power Plant Tritium Evaluation recommended the installation of additional monitoring well locations around Unit 3. Installation of these wells would provide a method to identify contaminants in the groundwater and the potential to mitigate these sources. In addition to tritium, samples should be analyzed for Sr-90, Cs-137, and Co-60. These wells will be located around Unit 3 and the well depths will range between 30 to 60 feet, depending on the geologic strata associated with the specific well location.

This scope of work is estimated at \$0.9 million.

Replacement of the RP Access Software System

The current Rad Protection Access system (ProRad) is no longer being updated and has limited support from the vendor (PTI). ProRad is satisfactory for the current workload in Unit 3. However, this system will not support the needs of the increased workforce for decommissioning Unit 3. With the upgrade completed in the near future, the system will be fully operable once significant decommissioning activities begin. This scope of work includes site installation, testing acceptance of the new system, and writing procedures on using the new system. This scope of work is estimated at \$0.6 million.

Employee Emergency Notification System

The existing Employee Emergency Notification System has limited capability for notification, e.g., a siren for attention followed by a series of code calls to identify the emergency and required employee actions. For a small set of employees with a fixed task of running the power plants, this system is acceptable. However, with the increased site activities of ISFSI construction and fuel loading, site demolition and construction of new power plants, and the final decommissioning of Units 1, 2, and 3, large numbers of diversified personnel with a variety of activities will require an emergency notification with greater capabilities.

The new system will be a public address based system with capabilities to provide both pre-recorded voice announcements and specific instructions for employees. This enhancement will eliminate the possibility of confusing code calls. This scope of work is estimated at \$0.4 million.

Emergency Condenser Asbestos Removal

During the performance of the asbestos removal project in 2002, it was determined that the asbestos on the Emergency Condenser could not be removed due to the proximity to the Spent Fuel Pool. With the fuel removal currently planned for 2008, there is the opportunity to remove the remaining asbestos as recommended by Duke Engineering and Services in the "Humboldt Bay Power Plant Unit No. 3 Decommissioning Preparatory Activities Report," which concluded that asbestos removal was a high value activity for preparing for decommissioning. PG&E is requesting that the cost of this scope of work be added back to the approved work to be funded from the Trust since the funding for this scope of work was reported in the 2005 NDCTP as not expended and therefore removed from the CPUC approved funding released for Decommissioning Activities. This scope of work is estimated at \$0.4 million.

Escalation Costs of the Dry Cask Equipment

Review of the escalation indices has resulted in an additional funding requirement for two reasons 1) changes in the contractual approved Bureau of Labor Statistics (BLS) indices for calculating the escalation from December 2001 (BLS ceased updating the indices, requiring PG&E and the contractor to assign new indices), and 2) index data actuals through 2006 indicate a cost greater than previously estimated and requested in PG&E Advice Letter 2565-E, approved by the CPUC in Resolution E-3912. This scope of work is estimated at \$1.3 million.

Law Department Support

PG&E legal counsel is supporting and reviewing specific contracts such as the Dry Cask System (Holtec International), the vault construction contract (ACC),

and Enercon services; attending presentations and providing feedback to PG&E management from various vendors in support of HBPP Decommissioning activities; attending Nuclear Regulatory Commission (NRC) meetings on issues related to the decommissioning of HBPP Unit 3; and evaluating various documents and their impact on HBPP Nuclear Decommissioning. This work scope is estimated at \$0.4 million.

Infrastructure for Facility Modifications

As PG&E moves forward with site decommissioning activities, the site staffing requirements are expected to increase significantly. Regulators from the NRC and various other California state agencies will need office space when overseeing key activities and certain decommissioning activities will require additional subcontractor site support. Current office space will be insufficient to support future needs. The simplest solution is to have onsite placement of additional temporary offices. Temporary office trailers can be rented or purchased for a relatively low cost when compared to new facility construction. Examples of additional needs include a new six-wide trailer to provide office space for approximately twenty engineering contractors during the decommissioning of HBPP Unit 3, trailers to house other agencies and additional single-wide trailers to support other decommissioning activities. This scope of work is estimated at \$0.9 million.

ATTACHMENT 2
ADVICE LETTER 3147-E

Category Reconciliation to Advice Letter 3147-E

- 1) Disposal of Class B & C Waste (\$8.1 million)
 - a. Disposal of Class B & C Waste - \$7.5 million
 - b. Burial of Spent Fuel Pool (SFP) Irradiated Hardware - \$0.6 million
- 2) Disposal of Class A Radioactive Waste (\$0.7 million)
 - a. Disposal of Class A Waste - \$0.7 million
- 3) Facility Modifications (\$0.9 million)
 - a. Infrastructure for Facility Mods - \$0.9 million
- 4) Purchase of GTCC storage container (\$1.1 million)
 - a. Purchase Greater than Class C Radiological Waste Cask - \$1.1 million
- 5) Operation of ISFSI (\$4.0 million)
 - a. Operation and Maintenance of ISFSI - \$4.0 million
- 6) Removal of equipment and piping (\$13.1 million)
 - a. Decommissioning Areas for Packing Waste Material - \$13.1 million
- 7) Increase escalation (\$1.3 million)
 - a. Escalation Cost of Dry Cask Equipment - \$1.3 million
- 8) Preparatory decommissioning activities (\$2.7 million)
 - a. Cross Contamination Plan - \$0.9 million
 - b. Replacement of RP Access Software System - \$0.6 million
 - c. Employee Emergency Notification System - \$0.4 million
 - d. Emergency Condenser Asbestos Removal - \$0.4 million
 - e. Law Department Support - \$0.4 million

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 (ID U39 M)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Megan Hughes

Phone #: (415) 973-1877

E-mail: mehr@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) #: 3147-E

Tier: 2

Subject of AL: Request Approval to Disburse Funds from the Humboldt Bay Power Plant Unit 3 Nuclear Decommissioning Trusts

Keywords (choose from CPUC listing): Nuclear Decommissioning

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

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: **No**

Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: **No**

Confidential information will be made available to those who have executed a nondisclosure agreement: Yes No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: _____

Resolution Required? Yes No

Requested effective date: December 1, 2007

No. of tariff sheets: 0

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, dispositions, 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

Tariff Files, Room 4005

DMS Branch

505 Van Ness Ave.,

San Francisco, CA 94102

jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Brian K. Cherry

Vice President, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

**PG&E Gas and Electric
Advice Filing List
General Order 96-B, Section IV**

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