

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 28, 2009

Advice Letter 3304-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: Procurement Transaction Quarterly Compliance Filing (Q2, 2008)

Dear Mr. Cherry:

Advice Letter 3304-E is effective January 9, 2009.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director
Energy Division



July 30, 2008

**Advice 3304-E
(Pacific Gas and Electric Company ID U 39 E)**

Public Utilities Commission of the State of California

Subject: Procurement Transaction Quarterly Compliance Filing (Q2, 2008)

Pacific Gas and Electric Company (PG&E) hereby submits to the California Public Utilities Commission (Commission or CPUC) its compliance filing for the first quarter of 2008, Pursuant to Pacific Gas and Electric Company's (PG&E) Conformed 2006 Long-Term Procurement Plan (LTPP), submitted in Advice 3233-E, PG&E hereby submits its Procurement Transaction Quarterly Compliance Report for record period April through June 2008 (Q2-2008)¹ and in accordance with Decision (D.) 03-12-062, O.P. 19, which requires that the Quarterly Procurement Plan Compliance Reports be submitted within 30 days of the end of the quarter.

Background

In D. 02-10-062, appendix B, *Adopted Master Data Request for Monthly Advice Letters*, outlines the required information for each utility's transaction reporting advice letter. The Energy Division clarified that the compliance items delineated in Appendix B of D.02-10-062 are for the Quarterly Report. The quarterly cycle for Appendix B was formalized in D.03-06-076, Order Modifying Decisions 02-10-062 and 02-12-074 and Denying Rehearing.² Subsequently, D. 03-12-062, O.P. 19, granted PG&E and SCE's joint petition to extend the due date of the quarterly filing from within 15 days to within 30 days of the end of the quarter.

In addition, a histogram (graph) of energy purchases and sales during the fourth quarter of 2007 is also provided in Confidential Appendix I.

Compliance Items

¹ PG&E's 2006 Conformed Long-Term Procurement Plan, Cal. P.U.C. Sheet No. 87.

² Ordering Paragraph 8 of the Decision modified the title of Appendix B from D.02-10-062 to read: "Adopted Master Data Request for Quarterly Advice Letters." Also, in the first sentence of Appendix B, the word "month's" was deleted and replaced with "quarter's."

A Confidential Attachment (the narrative) with supporting Appendices is being submitted to the Energy Division as follows:

Confidential Attachment and Related Appendices

The Confidential Attachment to this filing contains responses to the information requested in Appendix B of D.02-10-062, as clarified by D.03-06-076 and of D.02-12-074, O.P. 10.

The supporting Confidential Appendices are:

- Appendix A - Procurement Review Group - Meeting Minutes, Presentations
- Appendix B - Request for Offer for Resource Adequacy
- Appendix C - Request for Offer Summer Options
- Appendix D - Pipeline Capacity
- Appendix E - PG&E's Quarterly Transactions by Type and Quantity
- Appendix F - PG&E's Monthly Transactions by Type and Quantity
- Appendix G - PG&E's Monthly ISO Purchase and Sales Transactions for February, March, and April 2008
- Appendix H - Monthly Reports of Projected Need
- Appendix I - Histogram

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 **August 19, 2008**, which is 20 days after 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:

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

Facsimile: (415) 703-2200
E-mail: jjj@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.

The protest also should be sent via U.S. mail to (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

In compliance with D.02-10-062, the effective date of this advice letter is **July 30, 2008**.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter excluding the confidential appendices is being sent electronically and via U.S. mail to parties shown on the attached list and the service lists for Rulemaking (R.)01-10-024 and R.04-04-003. Address changes to the General Order 96-B service list should be directed to Rose de la Torre at (415) 973-4716. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at:

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

A handwritten signature in cursive script that reads "Brian Cherry / mt".

Vice President - Regulatory Relations

cc: Service List - R.01-10-024, R.04-04-003
PG&E's Procurement Review Group

Attachments

Confidential Attachment and Related Confidential Appendices A through I

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: Linda Tom-Martinez

Phone #: (415) 973-4612

E-mail: lmt1@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) #: **3304-E**

Tier: 2

Subject of AL: Procurement Transaction Quarterly Compliance Filing (Q2, 2008)

Keywords (choose from CPUC listing): Procurement Compliance

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.02-10-062, D.03-06-076, D.03-12-062

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: Yes. See page 2 of advice letter for the complete list of confidential information.

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: John Whitlow (415) 973-1127

Resolution Required? Yes No

Requested effective date: 7/30/08

No. of tariff sheets: N/A

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

**ADVICE LETTER FILING OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

**DECLARATION OF JOHN R. WHITLOW IN SUPPORT OF ADVICE LETTER
FILING 3304-E, THE SECOND QUARTER QUARTERLY PROCUREMENT
TRANSACTION COMPLIANCE REPORT**

I, John R. Whitlow, declare:

1. I am a Senior Energy Compliance and Reporting Analyst of the Electric Contracts Management and Settlements Department within the Energy Procurement Department at Pacific Gas and Electric Company (PG&E). I am responsible for the coordination of the quarterly procurement transaction compliance report and related data. In carrying out these responsibilities, I have acquired knowledge of the transactions identified, in PG&E's electric portfolio, which are the subject of this advice letter. I have reviewed PG&E's advice filing and was responsible for supervision of the preparation of narrative and related attachments. I am familiar with the information included in this response, and would testify to the facts and representations in this declaration under oath based on personal knowledge, experience, information, and belief.

2. Based on my knowledge and experience, and in accordance with the "Administrative Law Judge's Ruling Clarifying Interim Procedures For Complying With Decision 06-06-066," issued in Rulemaking 05-06-040 on August 22, 2006, I make this declaration seeking confidential treatment for certain information in a specific attachment in Advice Letter 3304-E, submitted on July 30, 2008.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes the particular type of data and information listed in Appendix 1 (the "IOU Matrix") of Decision 06-06-066. The matrix also specifies the category or categories in the IOU Matrix to which the data and information corresponds, and why confidential

protection is justified. Finally, the matrix specifies that: (1) PG&E is complying with the limitations specified in the IOU Matrix for that type of data or information; (2) the information is not already public; and (3) the data cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on July 30, 2008, at San Francisco, California.

/s/

JOHN R. WHITLOW

PACIFIC GAS AND ELECTRIC COMPANY
Procurement Transaction Quarterly Compliance Report
2nd Quarter—2008
July 30, 2008

Introduction

Pursuant to Pacific Gas and Electric Company's (PG&E) Conformed 2006 Long-Term Procurement Plan (LTPP), submitted in Advice 3233-E, PG&E hereby submits its Procurement Transaction Quarterly Compliance Report for record period April through June 2008 (Q2-2008).¹

During Q2-2008, PG&E engaged in competitive solicitations, bilateral contracting and market transactions conducted through brokers, electronic platforms and directly with counterparties to manage its net open (long or short) positions during the quarter and for portions of its future energy and capacity requirements. This report includes energy delivery and price data for transactions executed within Q2-2008.

PG&E's energy transactions in the California Independent System Operator (CAISO) markets are not finalized until after the CAISO settlement period, which occurs approximately 75 days after the close of an operating month. This report includes final quantities of energy in megawatt-hours (MWh) that PG&E procured in the CAISO markets for the months of February through April 2008, which are included in Confidential Appendix I. The quarterly report for the Q3-2008 will include final CAISO procurement for the months of May through July 2008.

Data Request Items

Decision 02-10-062, Appendix B, as clarified by Decision 03-06-076, sets forth specific elements to be addressed in this quarterly report. Each element is identified below, along with PG&E's response.

¹ PG&E's 2006 Conformed Long-Term Procurement Plan, Cal. P.U.C. Sheet No. 87.

1. Identification of the ultimate decision maker(s) up to the Board level, approving transactions.

Electric and gas procurement activities conducted during Q2-2008 included Request for Offer (RFO) for Resource Adequacy and Summer Heat Rate Options, fuel supply for utility-retained generation (URG) and contracted resources; gas hedging for both utility-owned facilities and other contracted facilities; renewable agreements, and forward, spot-market, and CAISO real-time transactions. Each of these activities is described in Section 3b. All procurement activity was approved and executed either by or under the direction of Fong Wan (Vice President, Energy Procurement) or Roy Kuga (Vice President, Energy Supply).

2. The briefing package provided to the ultimate decision maker.

For Q2-2008, there were no specific transactions requiring presentation to and approval from PG&E's Utility Risk Management Committee (URMC) and Risk Policy Committee (RPC).

3. Description of and justification for the procurement processes used to select the transactions (e.g., Request for Offers, electronic trading exchanges, CAISO spot markets).

To meet electric energy resource requirements during Q2-2008, PG&E engaged in a variety of procurement activities consistent with PG&E's Conformed 2006 LTPP² allowed under Decisions 03-12-062, 04-01-050 and 04-12-048.

PG&E implemented RFOs for Resource Adequacy and Summer Capacity Heat Rate Options, and voice and electronic exchange transactions. PG&E also procured in CAISO markets, as discussed in Section 3b.

PG&E procured fuel for its remaining URG fossil fuel electric generation facility at Humboldt Bay. PG&E also supplied fuel for its contracted resources through the Mirant Second Wraparound Agreement and the Dynergy Moss Landing Energy Tolling Agreement. Financial hedging transactions were completed to reduce risk associated with the open gas position. Transaction information is discussed further in Section 4.

² PG&E's 2006 Conformed Long-Term Procurement Plan, Cal. P.U.C. Sheet Nos. 10-14.

The pertinent presentations made by PG&E to its Procurement Review Group (PRG) and meeting notes of PRG meetings conducted in Q2-2008 that specifically relate to transactions executed in the quarter are in Confidential Appendix A.

3a. For competitive solicitations, describe the process used to rank offers and select winning bids.

Electric Procurement

PG&E executed agreements under RFO for Resource Adequacy (RA), Summer Heat Rate Options and Natural Gas Pipeline Capacity.

Resource Adequacy – Request for Offers to Purchase and Sell Local and System Resource Adequacy for 2008

PG&E issued an RFO to purchase and sell system and local RA based on a need assessment performed in March 2008. The RFO was completed on May 27, 2008. The RFO resulted in PG&E purchasing [REDACTED] MW and [REDACTED] MW of [REDACTED] and [REDACTED] 2008 respectively, RA-only capacity. The executed agreements are included in Confidential Appendix B.

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The March 2008 needs assessment highlighted a need to cover a system RA shortfall of up to [REDACTED] MW and [REDACTED] MW during [REDACTED] and [REDACTED] 2008 by procuring both import energy in the bilateral markets and by conducting a RFO solicitation. PG&E discussed its RA needs and its intention to issue a RA capacity RFO with the PRG on April 11, 2008. PG&E issued the RFO on April 21, 2008, to over 100 potential bidders. The RFO requested Q3-2008 RA capacity products consistent with the RA capacity product put forward by a multi-party working group in 2006. The RFO also requested offers to purchase system and local RA from PG&E. The transactions were to be made pursuant to an Electrical Engineering Institute Master or Western States Power Pool Agreement with credit requirements consistent with other solicitations PG&E has issued.

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On April 24, 2008, PG&E received indicative offers from thirteen bidders offering to [REDACTED] up to [REDACTED] MW of system RA capacity for Q3-2008. The system RA was priced from \$ [REDACTED]/kW-month to \$ [REDACTED]/kW-month for the months with system RA need ([REDACTED] 2008).

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Ultimately PG&E negotiated with [REDACTED] & [REDACTED] to provide [REDACTED] MW of [REDACTED] 2008 system RA at a price of \$ [REDACTED]/kW-month and [REDACTED] MW of [REDACTED] 2008 system RA at a price of \$ [REDACTED]/kW-month. Table 1 below summaries volumes and price. The executed agreements are in Confidential Appendix B. A summary of the executed amounts are in Table 1.

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16-19

20-21

**TABLE 1
PACIFIC GAS AND ELECTRIC COMPANY
RA RFO**

| Counterparty | Facility | Term | Quantity | Price (\$/kW per month) |
|--------------|------------|------------|------------|-------------------------|
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |

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April 2008 RFO – Request for Offers to Purchase energy options to meet a portion of PG&E’s energy needs for the summer 2008

Based on an assessment of resource needs performed in Q2-2008, PG&E issued a RFO for summer 2008 (June through September 2008) heat-rate options. This RFO concluded on May 30, 2008 and was performed in accordance with PG&E’s Procurement Plan.

The needs assessment was evaluated using the GenTrader economic dispatch model under the reference case as of March 21, 2008. Based on this assessment, PG&E determined that while it had sufficient energy during most of the summer 2008 period, it had significant shortfalls (i.e., over [REDACTED] MW short) under extreme load conditions. The primary focus of this RFO was to procure highly out-of-the-money (i.e., high heat-rate) energy options for use only during the highest peak hours of the summer. PG&E expects to utilize these products somewhat infrequently, at the steeper portions of the load duration curve as well as during events defined by stress scenarios (such as heat storms or extended outages when prices may rise appreciably). The monthly notional megawatts targeted under this RFO were further defined in the portfolio

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needs assessment to be for a total of up to [REDACTED] MW per month. Product characteristics included heat-rates, delivery location, delivery month and sub-period (6x16, 5x8). PG&E presented its analysis and notified the PRG of its intention to procure heat-rate options through a competitive solicitation process (RFO) at the PRG meeting on April 11, 2008.

PG&E issued the Heat-Rate Option RFO on April 22, 2008 to over 100 potential bidders. The RFO requested that sellers offer products in each of the following heat-rate categories:

Strike Price

For 6x16 products:

1. 9,000 – 13,500 Btu/kWh
2. 13,500 – 15,000 Btu/kWh
3. 15,000 – 18,000 Btu/kWh

For 5x8 and Minimum 4 hour/Maximum 8 hour block products:

4. 16,500 – 19,000 Btu/kWh

The solicitation required all bidders to (1) have an EEI Master Agreement in effect with PG&E or have executed a WSPP Agreement, or enter into the EEI Master or WSPP Agreement by the time final pricing was submitted; and (2) be investment-grade or provide credit support in the form of cash, guaranty or letter of credit.

PG&E received over [REDACTED] indicative offers from [REDACTED] different bidders on April 25, 2008. PG&E evaluated the offers from April 26-28, 2008 and developed a short-list of products based on suitability (portfolio need), mark-to-market, and premium outlay. Short-listed counter-parties were notified on April 30, 2008 and were requested to update the pricing on their products on May 1, 2008. Based on the refreshed prices, PG&E re-evaluated the offers and commenced final negotiations on contract terms for those that were selected. In total, PG&E executed [REDACTED] contracts for [REDACTED] different products from [REDACTED] counterparties. A summary of these executed transactions are in Table 2.

**TABLE 2
PACIFIC GAS AND ELECTRIC COMPANY
PG&E SUMMER 2008 RFO PURCHASES BY MONTH (MW)**

| Heat Rate | Counterparty | Jun-08 MW | Jul-08 MW | Aug-08 MW | Sep-08 MW |
|-------------|--------------|--------------|--------------|--------------|--------------|
| [REDACTED] | | | | | |
| Grand Total | | | | | |

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These results were shared with the Procurement Review Group via email on May 27, 2008. The executed agreements are in Confidential Appendix C.

Natural Gas Pipeline Capacity – Request for Offer to purchase Natural Gas Pipeline Capacity

As discussed in Q1-2008 Quarterly Procurement Transaction Compliance Report, Advice 3262-E, on February 11, 2008, PG&E issued an RFO for Q3-2008 (July 1 through September 30) pipeline capacity. Though not required, PG&E issued the RFO as a method for informing the marketplace of the desire for capacity. This RFO sought 50,000 MMBtu/d of firm capacity on any of the five interstate pipeline systems delivering gas to PG&E. PG&E also solicited accompanying intrastate capacity rights. PG&E issued the RFO to 40 counterparties and firm capacity holders. On February 26, 2008, PG&E received offers from six counterparties.

Using current forward prices, the capacity offered by Sempra Energy Trading (SET), Powerex, and Total represented the lowest delivered cost of gas at the PG&E Citygate. PG&E also acquired matching firm in-state capacity on PG&E's California Gas Transmission (CGT) system. The El Paso volumes were matched with seasonal firm (G-SFT) Baja capacity at the tariff straight fixed variable (SFV) rate. These transactions were reported in PG&E's QCR for the first quarter of 2008.

In Q2-2008, PG&E acquired Redwood capacity matching the GTN capacity discussed above at a discounted rate by participating in PG&E Core Procurement's capacity release auction for Q3. PG&E Electric fuels bid was awarded this Redwood capacity at a reservation rate of \$ [REDACTED]/MMBtu. Since this capacity's volumetric rate is \$ [REDACTED]/MMBtu, this represents a \$ [REDACTED]/MMBtu discount to CGT's full tariff rate. A copy of the confirmation is in Confidential Appendix D.

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Other RFO Information – For Informational Purposes

On April 1, 2008, PG&E issued its Long Term RFO. Through this RFO, PG&E seeks to acquire between 800 and 1,200 MWs of dispatchable and operationally flexible resources by 2015. The all-source RFO is open to offers from repowering and new conventional generation, renewable resources, distributed generation and qualifying facilities, through power purchase agreements from generation sources owned and operated by developers and new generation facilities constructed for utility ownership. Bids are due July 21, 2008.

On Monday, May 12, 2008, as a result of the RPS RFO 2008 Solicitation, PG&E received offers for renewable energy projects for power purchase agreements from generation sources owned and operated by others, new generation facilities constructed for utility ownership, or sites suitable for development of renewable energy projects. Evaluation of these offers will continue into the third quarter of 2008.

3b. For other transactional methods, provide documentation supporting the selection of the chosen products.

Electric Procurement

Other Bilateral Agreements Filed – For Informational Purposes

PG&E pursued and executed RPS agreements during second quarter 2008. RPS-related agreements were submitted to the Energy Division under a separate advice letter and are identified in Table 3.

**TABLE 3
PACIFIC GAS AND ELECTRIC COMPANY
RENEWABLES**

| <u>Advice Letter/Filing Date</u> | <u>Facility/Site</u> | <u>MW</u> |
|--|----------------------|-----------|
| Advice 3243-E (April 1, 2008) Contracts for Procurement of Renewable Energy Resources from Affiliates of BrightSource Energy, Inc. | Mojave Desert | 900 MW |
| Advice 3260-E (April 30, 2008) Third Amendment to the Power Purchase and Sale Agreement of CalRENEW-1 LLC | Mendota | 5 MW |
| Advice 3280-E-A (June 12, 2008) Contract for Renewable Energy from San Joaquin Solar 1, LLC and San Joaquin Solar 2, LLC) | San Joaquin County | 106 MW |

Broker, Voice and Electronic Exchange Transactions

For electric energy, in addition to competitive procurement and bilateral contracting during the Q2-2008, PG&E engaged in competitive voice and electronic broker market transactions in order to manage its net open position, and traded directly with counterparties via telephone (in accordance with terms of Master Agreements). These transactions were conducted to manage PG&E's net physical open position and to participate in economic transactions designed to reduce ratepayers' exposure to market volatility. Pursuant to Decision 04-12-048, transactions include forward transactions with delivery starting within the next quarter and up to one quarter in duration, monthly, balance of month (BOM), day-ahead and hour-ahead transactions. These transactions are included in Table 4.

In Q2-2008, PG&E continued the use of voice and broker market for non-standard products, such as trading in day-ahead markets for individual hours, blocks or strips of hours, on specific days of the week. Where possible, PG&E continues to expand its trading in these markets to promote competitive markets for products that better fit its load-serving obligations and, to the extent practicable, procure only the energy required rather than standard products.

As part of its effort to reduce the forward net open position in order to limit spot market energy transactions, PG&E entered into a series of term and BOM energy purchases and sales during Q2-2008. Table 4 below show a summary of the strategies that PG&E completed in each month. The aggregate energy volumes are included in Table 4.

**TABLE 4
PACIFIC GAS AND ELECTRIC COMPANY
Q2-2008 TERM AND BALANCE OF MONTH AND ENERGY PURCHASES AND (SALES)
MEGAWATTS**

| Transaction Month | Delivery Month | | | | | | |
|-------------------|----------------|-----|------|------|--------|----|----|
| | April | May | June | July | August | Q3 | |
| April | | | | | | | 34 |
| May | | | | | | | |
| June | | | | | | | |

Electric Procurement Planning

Near-Term Planning and Procurement

As prescribed by Decision 03-12-062, PG&E’s near-term planning process is designed to reduce the net open position prior to the operating month to within 5 percent of expected requirements. PG&E develops a near-term analysis of its resource position (intra-month through several months forward) using an optimization model, which solves for lowest cost by optimizing a mix of resources to meet requirements, including dispatchable CDWR contracts, URG resources (for simplicity, Power Purchase Agreements with dispatchability are included in

this category (e.g., Crockett), Tolling Arrangements with “Merchant Plants” (e.g., Dynegy and Mirant), and market purchases, while accounting for all resource requirements and constraints (must-run, must-take and operating constraints).

Term and BOM purchases and sales are transacted to close the net open position and to reduce PG&E’s reliance on the spot market. PG&E also conducts locational basis spread transactions to manage its position in different zones. After identifying transactions required to meet the must-run, must-take and operating constraints, PG&E considers “economic” transactions that involve decisions regarding dispatchable units and market purchases/sales. The decision to engage in “economic” transactions is more complex and depends on several quantitative and subjective factors. “Economic” transactions are conducted using information and data regarding system conditions, market prices and options available at the time of the decision. While potentially, attractive, “economic” transactions that reduce ratepayer volatility inherently include risks that must be considered, such as: (a) sharp swings in electric prices; (b) changes in production costs due to market dynamics; or (c) system changes, which may result in these transactions becoming more, or less, valuable, during the operating period or possible losses on hedge transactions. Additionally, changes in load or expected generation may result in having to buy (or sell) energy in the day-ahead or real-time markets at a cost greater than the revenue earned (or a price less than paid) in the forward transaction. Factors that go into the decision to engage in these transactions include (but are not limited to) the forecasted level of short/long energy during the forecasted period, sensitivity to changes in market price, reserve margins and demand volatility.

Day-Ahead Planning and Procurement

In day-ahead planning, PG&E strives to balance projected energy requirements with available resources and provide hour-ahead traders and real-time operators with appropriate resources in order to respond to changes that may occur in system requirements subsequent to day-ahead trading. On a daily basis, PG&E conducts a least-cost analysis to determine unit

dispatch and market transactions to meet energy and ancillary services requirements. This process integrates all regulatory, environmental, safety and legal requirements.

During Q4-2005, a new requirement was included in PG&E's least cost dispatch process. The CAISO gained Federal Energy Regulatory Commission (FERC) approval on September 2005, to amend its operating tariffs (i.e., "Amendment No. 72"). This Amendment requires scheduling coordinators to schedule at least 95 percent of its load in the day-ahead time frame. On February 23, 2007, CAISO filed a further amendment to Amendment No. 72 to relax the existing minimum load-scheduling requirement during off-peak hours from 95 to 75 percent of each Scheduling Coordinator's demand forecast and to establish specific exemptions to account for small or infrequent scheduling deviations. FERC accepted CAISO's filing, effective April 26, 2007.

PG&E's day-ahead planning and procurement incorporates weather-adjusted load forecasts, resource availability, dispatch costs and current electric market prices. The results of this analysis will determine the supply mix of CDWR contracts allocated to PG&E, PG&E-owned or controlled thermal and hydro generation, QFs and existing bilateral contracts, and market purchases. In determining its trading strategy, PG&E will dispatch resources whose variable costs are below market price, purchase the remainder of energy at market price or, alternatively, sell excess energy in the market.

While PG&E strives to go into the hour-ahead trading market and real-time operations with schedules as close to balanced as practicable, PG&E must also anticipate and plan for potential schedule changes. Between the day-ahead and hour-ahead market timeframes, changes in system conditions such as weather, transmission and resource availability are inevitable. Further, resources are "lumpy" when compared to load; hence, it is not always possible to perfectly balance schedules in every hour, which often results in excess energy during some hours while leaving PG&E short during other hours. To address these concerns, PG&E has contracted for resources that provide intra-day flexibility that will help to match changes in electric demand—such as sudden weather variations and other occurrences—that cause loads

and resources to vary from day-ahead forecasts. These contracts contribute to system reliability as well as reduce incremental, decremental and other costs associated with the changes between day-ahead and hour-ahead forecasted conditions, and thereby reduces costs overall to consumers. The specific agreements have been addressed in PG&E's Q2-2005 Quarterly Procurement Compliance advice letter (Advice 2693-E).

In addition, PG&E's daily procurement process incorporates opportunities available in the day-ahead market as well as its must-run and must-take resource requirements by purchasing or selling energy for individual hours or small blocks of hours.

PG&E actively participates in the daily energy market using a combination of brokered transactions, exchange-based transactions and direct transactions with counterparties. Day-ahead trading generally occurs between 5:30 a.m. and 7 a.m. on the day prior to the operating day. The day-ahead market continues to evolve in terms of participants, products and characteristics. In addition to "standard" on-peak and off-peak "packages" of multiples of 25 MW blocks of energy with specified delivery points, the day-ahead market has become more liquid in the trading of non-standard products, with individual-hourly transactions as well as custom packages of hours.

Hour-Ahead Planning and Procurement

"Hour-ahead" planning and procurement is somewhat of a misnomer since it effectively begins at the conclusion of day-ahead trading market. As day-ahead analysis and trading occurs early in the morning prior to the operating day, there can be substantial changes to operating day requirements. Additionally, PG&E prepares weather-adjusted load forecasts throughout the day in order to determine if changes in generation or system operation are required. Further, unit outages and transmission outages and constraints may also affect resource requirements prior to real-time. To balance its portfolio during this time frame, PG&E's hour-ahead staff has several resources at its disposal. Generation, including hydro, the Helms units, certain QF generators, and certain CDWR contracts, may be adjusted at unique dispatch prices. Hour-ahead personnel will then optimize the portfolio, and based on operating requirements and market opportunity

costs will decide if available generating resources should be adjusted to minimize system costs, and whether market transactions are required or beneficial.

The hour-ahead market, while active, is far less transparent and dynamic than that of the day-ahead market. As there are few brokers operating in this market and limited electronic exchange opportunities, the bulk of transactions are bilateral in nature. PG&E constantly participates in the hour-ahead market to optimize its generation and market transactions to reduce costs.

CAISO Real-Time Markets

There is limited opportunity for planning and analysis in anticipation for real-time operation. PG&E strives to match requirements and resources in its CAISO hour-ahead schedules, and submits supplemental energy bids, as well as ancillary service schedules and bids. Once hour-ahead schedules, supplemental bids and resource adjustment bids are provided to the CAISO, the CAISO integrates the PG&E portfolio with the remainder of the CAISO grid.

In the real-time market, unlike the bilateral and exchange markets, market participants have limited discretion to transact. Further, a market participant's energy purchases and sales in the real-time market may not represent imbalances in a utility's submitted portfolio. While PG&E and other market participants submit real-time supplemental energy bids to the CAISO, the CAISO optimizes resources to meet system requirements, which may or may not be a result of any individual participant's activities. For instance, the CAISO may determine certain unscheduled reliability must-run units are required to ensure system reliability and dispatch these units accordingly. To accommodate the over-generation resulting from the dispatch of these units, CAISO will send decremental energy instructions in rank-bid order to certain generating resources to reduce output.

Locational Spreads

During Q2-2008, PG&E engaged in day-ahead locational spread transactions, authorized by the California Public Utilities Commission (CPUC or Commission) in Decision 04-12-048 and included in PG&E's 2006 procurement plan, in order to manage its position, reduce risk of

congestion pricing, and maximize the value of its purchased firm transmission rights assets. Energy volumes and average prices associated with these spread transactions are listed on quarterly and monthly transaction summaries, respectively, included as Confidential Appendices E and F.

4. Explanation/justification for the timing of the transactions (i.e., product term and rate of procurement).

Electric Transactions

Table 5 represents PG&E’s executed forward and spot transactions, along with energy volumes, by tenor. Transaction information for energy that was delivered and received within each month, regardless of transaction execution date, has previously been provided to the Energy Division in PG&E’s monthly data request submittals.

**TABLE 5
PACIFIC GAS AND ELECTRIC COMPANY
Q2-2008 FORWARD ELECTRIC TRANSACTIONS
(VOLUME IN GIGAWATT HOURS (GWh))**

| | Term | BOM | Day-Ahead | Hour-Ahead | Day-Ahead Options | Other (Non-Standard) | Total |
|----------------------------|------|-----|-----------|------------|-------------------|----------------------|-------|
| <u>Purchases and Sales</u> | | | | | | | |
| Transactions Volumes | | | | | | | |
| <u>Total Purchases</u> | | | | | | | |
| Transactions Volumes | | | | | | | |
| <u>Total Sales</u> | | | | | | | |
| Transactions Volumes | | | | | | | |

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In addition to forward market participation, PG&E was a participant in the CAISO real-time “imbalance” and “supplemental” energy markets, purchasing and selling energy. As discussed above, transactions in the real-time market may be unrelated to PG&E’s position, as

the CAISO purchases and sells energy in order to balance the control area grid without distinguishing an individual participant's portfolio position.

Confidential Appendices E and F detail PG&E's quarterly and related monthly energy transactions delivered and received during the quarter (by type, cost and quantity).³ Confidential Appendix G details PG&E's monthly CAISO purchase and sales transactions for February, March, and April 2008.⁴

Electric Fuels Section – Gas Transactions for Utility-Owned and Contracted Generation

Natural Gas Supply

During Q2-2008, PG&E continued to supply gas for its utility-owned generation plant and for several tolling agreements. PG&E-owned generation includes just Humboldt Bay Power Plant. PG&E tolling arrangements include an agreement with Dynegy (formerly LS Power) for Moss Landing Power Plant and an agreement with Mirant for Contra Costa and Pittsburg Power Plants. On February 11, 2008, PG&E sent its summer 2008 gas purchasing plan to the PRG. This plan, which was sent via email because it was similar to the summer 2007 plan, outlined PG&E's strategy to purchase a variety of gas supply, peaking, storage and transportation products to meet its expected gas demand during the summer months. The plan included execution of a number of transactions in Q2-2008. Those transactions are described below.

Table 6 summarizes the daily and term gas purchases PG&E transacted during the Q2-2008 for the portfolio. Table 7 summarizes gas deliveries during the quarter allocated between PG&E-owned generation, tolling arrangements and gas storage based on the volumes delivered to each facility. Local transportation costs are based on actual deliveries in the calendar month gas was delivered. Table 6 includes all gas purchased in Q2-2008 regardless of

³ The attached transaction reports reflect delivered energy from transactions during the period, including transactions executed in prior periods with deliveries in the current period. Energy quantities will differ between executed transaction energy and delivered energy for any given period.

⁴ Effective October 1, 2004, the CAISO implemented its Phase 1B market changes. The impact on this appendix is the inclusion of an additional charge type that provides for real time purchases and sales related to Generation Meter Multipliers.

**TABLE 7
PACIFIC GAS AND ELECTRIC COMPANY
SUMMARY OF Q2-2008 GAS DELIVERIES BY FACILITY OR TOLLING AGREEMENT**

| PG&E Facility or Tolling Agreement | Volume (million MMBtu) | Commodity Cost (\$/millions) | Transportation Cost (\$/millions) | Total Unit Cost (\$/MMBtu) |
|------------------------------------|------------------------|------------------------------|-----------------------------------|----------------------------|
| Humboldt Bay Power Plant | | | | |
| Mirant: Contra Costa Power Plant | | | | |
| Mirant: Pittsburg Power Plant | | | | |
| Dynegy: Moss Landing 6 and 7 | | | | |
| Gas Storage (Withdrawals) | | | | |
| Total* | | | | |

37

Note: * Storage values not included in totals.

Financial Gas Hedging

On January 31, 2006, PG&E filed an updated Electric Portfolio Gas Hedging Plan (GHP) Update 2006-1 with the Commission. The plan provided minor modifications to the framework that PG&E uses to manage the price risk associated with the gas open position in its electric portfolio. The updated plan augments and is consistent with PG&E’s then current Commission-approved electric procurement plans and Gas Supply Plans for CDWR Tolling Agreements. GHP Update 2006-1 was approved by the CPUC’s Energy Division on April 4, 2006, with an effective date of March 17, 2006. In December 2007, PG&E reviewed the gas hedging strategy in GHP Update 2006-1 and determined that it was still an appropriate gas hedging strategy to implement in 2008. In addition, the CPUC decision approving PG&E’s 2006 LTPP (D.07-12-052) did not approve PG&E’s hedging plan proposal and instructed PG&E to continue hedging under existing authority.⁵ Thus, on January 9, 2008, PG&E presented to its PRG this strategy to “roll” the gas hedging strategy in GHP Update 2006-1 into 2008 for implementation beginning January (GHP 2008-1). This strategy included revised hedging targets to comply with the Commission’s TeVaR 95th percentile directive.

⁵ This decision also revised PG&E’s To-expiration-Value-at-Risk metric from measurement at the 99th percentile to the 95th percentile.

PG&E began implementation of GHP 2008-1 in January and continued implementation through the second quarter. Pursuant to the plan, PG&E is on track to complete the implementation of GHP 2008-1 in [REDACTED].

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The hedge transactions that PG&E executed in Q2-2008 under GHP 2008-1 are summarized in Table 8.

**TABLE 8
PACIFIC GAS AND ELECTRIC COMPANY
SUMMARY OF PG&E ELECTRIC PORTFOLIO GAS HEDGES FOR PLAN 2008-1**

| Product | Location | Product Term (Month/Year) | Option Premium (\$/MMBtu) | Price or Strike Price (\$/MMBtu) | Notional Volume (million MMBtu) | Notional Value (\$/millions) |
|------------|------------|---------------------------|---------------------------|----------------------------------|---------------------------------|------------------------------|
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |

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5. Discussion of the system load requirements/conditions underlying the need for the month’s transactions.

Dry conditions continued in Q2 with only 25.4 percent of normal precipitation. PG&E’s conventional hydroelectric resources were used to meet daily loads and to provide ancillary service reserves while using natural runoff to fill reservoirs prior to the summer season.

Helms Pumped Storage Project was used to meet peak daily loads and provide ancillary service reserves. Helms pumped throughout the quarter as system conditions and economics allowed. Pumping was limited by transmission work and unit maintenance. No significant planned maintenance was performed in Q2. Helms 2 was forced out for three days due to exciter trouble.

Significant planned maintenance on conventional hydro in the quarter included work on Balch 3 (53 MW), Belden (115 MW), Bowman (41.5 MW), Chicago Park (41.5 MW), Grizzly (20 MW), James Black Units 1 and 2 (86 MW ea.), and Tiger Creek Units 1 and 2 (30 MW ea.).

Significant forced outages on conventional hydro during the quarter included: Caribou 2 Unit 4 due to extension of scheduled overhaul and Sly Creek for approximately ten days due to turbine bearing and lube oil system trouble.

For PG&E's retained fossil generation, Humboldt Unit 1 (conventional steam, 52 MW) completed its annual maintenance on April 19.

Diablo Canyon Unit 2 completed a planned outage on April 12, which was for normal refueling and to replace a steam generator.

During April 2008, PG&E was a net [REDACTED] in the off-peak hours in the day-ahead market, a net [REDACTED] in the on-peak hours in the day-ahead market, a net [REDACTED] in the on-peak hours in the hour-ahead market, and a net [REDACTED] in the off-peak hours in the hour-ahead market. Market prices for day-ahead on-peak North of Path 15 (NP-15) delivery ranged from approximately \$ [REDACTED]/MWh to \$ [REDACTED]/MWh. Day-ahead off-peak electric prices in NP-15 ranged from approximately \$ [REDACTED]/MWh to \$ [REDACTED]/MWh. Daily gas prices during the month at PG&E Citygate traded in a range between \$ [REDACTED]/MMBtu and \$ [REDACTED]/MMBtu.

During May 2008, PG&E was a net [REDACTED] in the on-peak hours in the day-ahead market, a net [REDACTED] in the off-peak hours in the day-ahead market, a net [REDACTED] in the on-peak hours in the hour-ahead market, and a net [REDACTED] in the off-peak hours in hour-ahead market. Market prices for day-ahead on-peak NP-15 delivery ranged from approximately \$63.61/MWh to \$119.15/MWh. Day-ahead off-peak electric prices in NP-15 ranged from approximately \$26.32/MWh to \$80.25/MWh. Daily gas prices during the month at PG&E Citygate traded in the range between \$10.26/MMBtu and \$11.50/ MMBtu.

During June 2008, PG&E was a net [REDACTED] in the on peak hours in the day-ahead market, a net [REDACTED] in the off peak hours in the day-ahead market, a net [REDACTED] in the on peak hours in the hour ahead market; and a net [REDACTED] in the off peak hours in the hour-ahead market. Market

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41-42

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44-45

46-47

48-49

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51-52

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55-56

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prices for day-ahead on-peak NP-15 delivery ranged from approximately \$ [REDACTED]/MWh to \$ [REDACTED]/MWh. Day-ahead off-peak electric prices in NP-15 ranged from approximately \$ [REDACTED]/MWh to \$ [REDACTED]/MWh. Daily gas prices during the month at PG&E Citygate traded in a range between \$ [REDACTED]/MMBtu and \$ [REDACTED]/MMBtu.

58
59
60-61
62-63

6. Discussion of how the quarter’s transactions meet the goals of the risk management strategy reflected in the Commission-approved procurement plan.

Decision 03-12-062 maintained the interim consumer risk tolerance (CRT) level of one-cent per kilowatt-hour (kWh) adopted by the Commission in Decision 02-12-074 for the “net open position” on a rolling 12 months basis. Decision 07-12-052 specified the methodology for reporting the CRT should be based on To Expiration Value at Risk (TeVAr) at the 95 percent confidence level. The decision also requires PG&E to notify the PRG when the portfolio reaches 125 percent of the one-cent per kWh level to determine if remedial action or revised plans should be filed in order to manage this risk.

During Q2-2008, PG&E’s position exceeded the CRT level of one-cent per kWh and the 125 percent of the one-cent per kWh notification level. However, PG&E filed a comprehensive gas hedging plan update on January 31, 2006 (Advice 2775-E) to address anticipated increases in TeVaR for 2006 and 2007. On March 17, 2006, the Director of the Energy Division approved this update. PG&E began implementing that plan update throughout the remainder of 2006. On January 9, 2008, PG&E presented to its PRG a recommendation to continue this strategy in 2008 with modifications to comply with the Commission’s TeVaR 95 percent directive (extending the hedging delivery period to the end of 2012). PG&E received no objections and began implementation of this strategy in January 2008. PG&E continued implementing this strategy in Q2-2008.

In addition, further actions were taken to reduce TeVaR. PG&E made recommendations to CDWR per Gas Supply Plan 10 (Advice 3204-E, approved by the Director of the Energy Division on April 1, 2008) regarding forward gas hedging for certain contracts allocated to

PG&E. The results will be further discussed in PG&E's 2007 Energy Resource Recovery Account compliance review application to be filed February 2009.

7. Copy of each contract.

As discussed in Section 3b, during Q2-2008, PG&E executed contractual documents for this Procurement Transaction Quarterly Compliance advice filing. Confidential Appendices B, C, and D include these agreements.

8. The break-even spot price equivalent to the contract(s).

There is no applicable analysis required for this quarter's executed agreements.

9. Electronic copy of any data or forecasts used to analyze the transactions.

Confidential Appendix H: This information is also provided to the Commission as part of PG&E's monthly report of Residual Net Open.

10. Utilities should provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs. Utilities should also provide documentation on the model and how it operates.

PG&E performed the appropriate number of analyses within the needs assessment process associated with its procurement activities during the quarter. However, these procurement activities were filed under separate advice filings and thus included in them.

11. Histogram of energy purchases and sales ("buy and sells").

Confidential Appendix I is a histogram (graph) of energy purchases and sales by price and volume (GWh) for Q2-2008, as requested by the CPUC Energy Division.

12. Compliance with Decision 07-01-039, Greenhouse Gas and related agreements executed in Q2-2008.

PG&E does not have any agreements to disclose for Q2-2008 applicable to this decision.

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|----|--|--|--|--|--|--|---|-----------------------|
| 1 | PACIFIC GAS AND ELECTRIC COMPANY | | | | | | | |
| 2 | Document: Advice | | | | | | | |
| 3 | IDENTIFICATION OF CONFIDENTIAL INFORMATION PER DECISION 06-06-066 | | | | | | | |
| 4 | Date: July 30, 2008 | | | | | | | |
| 5 | | | | | | | | |
| | Redaction Reference | 1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 (Y/N) | 2) Which category or categories in the Matrix the data correspond to: | 3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N) | 4) That the information is not already public (Y/N) | 5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N) | PG&E's Justification for Confidential Treatment | Length of Time |
| 6 | | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 7 | 1 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 8 | 2 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 9 | 3 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 10 | 4 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 11 | 5 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 12 | 6 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 13 | 7 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 14 | 8 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 15 | 9 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |

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| 16 | 10 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 17 | 11 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 18 | 12 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 19 | 13 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 20 | 14 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 21 | 15 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 22 | 16 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 23 | 17 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 24 | 18 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |

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| 25 | 19 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 26 | 20 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 27 | 21 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 28 | 22 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 29 | 23 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 30 | 24 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 31 | 25 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 32 | 26 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 33 | 27 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |

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| 6 | | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 34 | 28 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 35 | 29 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 36 | 30 | Y | Page 18, Item VIII Competitive Solicitation (Bidding) Information - Electric | Y | N | N | The only information PG&E is redacting is volume, price, counterparty and time period. This would reveal PG&E's position in the market. | 3 years |
| 37 | 31 | Y | Under Public Utilities Code Section 583 and General Order 66-C | Y | N | N | The only information PG&E is redacting is volume that PG&E purchased, which is protected for three years. | 3 years |
| 38 | 32 | Y | Under Public Utilities Code Section 583 and General Order 66-C | Y | N | N | The only information PG&E is redacting is volume that PG&E purchased, which is protected for three years. | 3 years |
| 39 | 33 | Y | Under Public Utilities Code Section 583 and General Order 66-C | Y | N | N | The only information PG&E is redacting is volume that PG&E purchased, which is protected for three years. | 3 years |
| 40 | 34 | Y | Page 22, Item XIII, Energy Division Monthly Data Request | Y | N | N | Identification of amounts that contribute to the Monthly Energy Division Report | 3 years |
| 41 | 35 | Y | Page 22, Item XIII, Energy Division Monthly Data Request | Y | N | N | Identification of amounts that contribute to the Monthly Energy Division Report | 3 years |
| 42 | 36 | Y | Page 2, Item I.A.4 - Long-term fuel (gas) buying and hedging plans; Page 3, Item II.B.2 Utility recorded gas procurement and cost information | Y | N | N | Gas purchases and identification of position in market | 3 years |
| 43 | 37 | Y | Page 2, Item I.A.4 - Long-term fuel (gas) buying and hedging plans; Page 3, Item II.B.2 Utility recorded gas procurement and cost information | Y | N | N | Gas purchases and identification of position in market | 3 yrs |

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| 1 | PACIFIC GAS AND ELECTRIC COMPANY | | | | | | | |
| 2 | Document: Advice | | | | | | | |
| 3 | IDENTIFICATION OF CONFIDENTIAL INFORMATION PER DECISION 06-06-066 | | | | | | | |
| 4 | Date: July 30, 2008 | | | | | | | |
| 5 | | | | | | | | |
| | Redaction Reference | 1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 (Y/N) | 2) Which category or categories in the Matrix the data correspond to: | 3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N) | 4) That the information is not already public (Y/N) | 5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N) | PG&E's Justification for Confidential Treatment | Length of Time |
| 6 | | | | | | | | |
| 44 | 38 | Y | Page 2, Item I.A.4 - Long-term fuel (gas) buying and hedging plans; Page 3, Item II.B.2 Utility recorded gas procurement and cost information | Y | N | N | Identification of hedging strategies. | 3 yrs |
| 45 | 39 | Y | Page 2, Item I.A.4 - Long-term fuel (gas) buying and hedging plans; Page 3, Item II.B.2 Utility recorded gas procurement and cost information | Y | N | N | Identification of hedging strategies. | 3 yrs |
| 46 | 40 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 47 | 41 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 48 | 42 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 49 | 43 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 50 | 44 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 51 | 45 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |

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| 52 | 46 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 53 | 47 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 54 | 48 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 55 | 49 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 56 | 50 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 57 | 51 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 58 | 52 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 59 | 53 | Y | Page 13, Item VI, Open Net Position; Electric; Page 2, Item IA.4 - Long-term fuel (gas) buying and hedging plans | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |

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| 60 | 54 | Y | Page 13, Item VI, Open Net Position; Electric; Page 2, Item IA.4 - Long-term fuel (gas) buying and hedging plans | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 61 | 55 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 62 | 56 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 63 | 57 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 64 | 58 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 65 | 59 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 66 | 60 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 67 | 61 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 68 | 62 | Y | Page 22, Item XIII, Energy Division Monthly Data Request, Page 13, Item VI, Open Net Position; Electric | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |

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| 69 | 63 | Y | Page 13, Item VI, Open Net Position; Electric; Page 2, Item IA.4 - Long-term fuel (gas) buying and hedging plans | Y | N | N | Reveals PG&E's position in the energy procurement market. Identification of strategies-leading to transactions that close our net open position. | 3 yrs |
| 70 | Confidential Attachment A | Y | Page 15, Section VII - Bilateral Contract Terms and Conditions - Electric, Section B - Contracts and power purchase agreements between utilities and non-affiliated third parties (except RPS) and Public Utilities Code 583 and General Order 66-C | Y | N | N | Presentations specifically relate to bilateral agreement of settlement reached between PG&E and counterparty | 3 yrs |
| 71 | Confidential Attachment B | Y | Page 15, Section VII - Bilateral Contract Terms and Conditions - Electric, Section B - Contracts and power purchase agreements between utilities and non-affiliated third parties (except RPS) and Public Utilities Code 583 and General Order 66-C | Y | N | N | Specific agreements related to price, counterparty, and volumes | 3 yrs |
| 72 | Confidential Attachment C | Y | Page 15, Section VII - Bilateral Contract Terms and Conditions - Electric, Section B - Contracts and power purchase agreements between utilities and non-affiliated third parties (except RPS) and Public Utilities Code 583 and General Order 66-C | Y | N | N | Specific agreements related to price, counterparty, and volumes | 3 yrs |

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| 73 | Confidential Attachment D | Y | Page 15, Section VII - Bilateral Contract Terms and Conditions - Electric, Section B - Contracts and power purchase agreements between utilities and non-affiliated third parties (except RPS) and Public Utilities Code 583 and General Order 66-C | Y | N | N | Specific agreements related to price, counterparty, and volumes | 3 yrs |
| 74 | Confidential Attachment E | Y | Page 13, Item VI.A - Utility Bundled Net Open for Energy (MWh); Page 22, Item XIII - Energy Division Monthly Data Request (AB 57) | Y | N | N | A derivative of the Energy Division Monthly Data Request. The data provided identifies purchases and sales, and thus reveals PG&E's position in the market. | 3 yrs |
| 75 | Confidential Attachment F | Y | Page 13, Item VI.A - Utility Bundled Net Open for Energy (MWh); Page 22, Item XIII - Energy Division Monthly Data Request (AB 57) | Y | N | N | Identification of purchases and sales, by market with corresponding dollars and thus reveals PG&E's position in the market. | 3 yrs |
| 76 | Confidential Attachment G | Y | Page 22, Item XI - Monthly Procurement Costs (Energy Resource Recovery Account (ERRA) filings) | Y | N | N | Identification of purchases and sales, by market with corresponding dollars and thus reveals PG&E's position in the market. | 3 yrs |
| 77 | Confidential Attachment H | Y | Page 13, Item VI.A - Utility Bundled Net Open for Energy (MWh); Page 22, Item XIII - Energy Division Monthly Data Request (AB 57) | Y | N | N | Identification of purchases and sales, by market with corresponding dollars and thus reveals PG&E's position in the market. | 3 yrs |
| 78 | Confidential Attachment I | Y | Page 13, Item VI.A - Utility Bundled Net Open for Energy (MWh); Page 22, Item XIII - Energy Division Monthly Data Request (AB 57) | Y | N | N | A derivative of the Energy Division Monthly Data Request. The data provided identifies purchases and sales, and thus reveals PG&E's position in the market. | 3 yrs |

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

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| Aglet | Department of the Army | Northern California Power Association |
| Agnews Developmental Center | Dept of General Services | Occidental Energy Marketing, Inc. |
| Alcantar & Kahl | Division of Business Advisory Services | OnGrid Solar |
| Ancillary Services Coalition | Douglas & Liddell | PITCO |
| Anderson & Poole | Douglass & Liddell | PPL EnergyPlus, LLC |
| Arizona Public Service Company | Downey & Brand | Pinnacle CNG Company |
| BART | Duke Energy | Praxair |
| BP Energy Company | Duncan, Virgil E. | R. W. Beck & Associates |
| Barkovich & Yap, Inc. | Dutcher, John | RCS, Inc. |
| Bartle Wells Associates | Ellison Schneider & Harris LLP | RMC Lonestar |
| Blue Ridge Gas | Energy Management Services, LLC | Recon Research |
| Braun & Associates | FPL Energy Project Management, Inc. | SCD Energy Solutions |
| C & H Sugar Co. | Foster Farms | SCE |
| CA Bldg Industry Association | Foster, Wheeler, Martinez | SESCO |
| CAISO | Franciscan Mobilehome | SMUD |
| CLECA Law Office | G. A. Krause & Assoc. | SPURR |
| CSC Energy Services | GLJ Publications | Santa Fe Jets |
| California Cotton Ginners & Growers Assn | Goodin, MacBride, Squeri, Schlotz & Ritchie | Seattle City Light |
| California Energy Commission | Green Power Institute | Sempra Utilities |
| California League of Food Processors | Hanna & Morton | Sequoia Union HS Dist |
| California Public Utilities Commission | Heeg, Peggy A. | Sierra Pacific Power Company |
| California Water Company | Hitachi | Silicon Valley Power |
| Calpine | Hogan Manufacturing, Inc. | Smurfit Stone Container Corp |
| Cameron McKenna | Imperial Irrigation District | Southern California Edison Company |
| Cardinal Cogen | Innercite | St. Paul Assoc. |
| Casner, Steve | International Power Technology | Sunshine Design |
| Cerox | Intestate Gas Services, Inc. | Sutherland, Asbill & Brennan |
| Chamberlain, Eric | J. R. Wood, Inc. | TFS Energy |
| Chevron Company | JTM, Inc. | Tabors Caramanis & Associates |
| Chris, King | Los Angeles Dept of Water & Power | Tecogen, Inc. |
| City of Glendale | Luce, Forward, Hamilton & Scripps LLP | TransCanada |
| City of Palo Alto | MBMC, Inc. | Turlock Irrigation District |
| City of San Jose | MRW & Associates | U S Borax, Inc. |
| Clean Energy Fuels | Manatt Phelps Phillips | United Cogen |
| Coast Economic Consulting | Matthew V. Brady & Associates | Utility Cost Management |
| Commerce Energy | McKenzie & Associates | Utility Resource Network |
| Commercial Energy | Meek, Daniel W. | Utility Specialists |
| Constellation | Merced Irrigation District | Vandenberg Air Force |
| Constellation New Energy | Mirant | Verizon |
| Consumer Federation of California | Modesto Irrigation District | Wellhead Electric Company |
| Crossborder Energy | Morgan Stanley | Western Manufactured Housing Communities Association (WMA) |
| Davis Wright Tremaine LLP | Morrison & Foerster | White & Case |
| Day Carter Murphy | New United Motor Mfg., Inc. | eMeter Corporation |
| Defense Energy Support Center | Norris & Wong Associates | |
| Department of Water Resources | North Coast SolarResources | |