

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 27, 2009

**Advice Letter 3486-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: Non-Routine True-Up Mechanism Advice Filing for Dedicated  
Rate Component Series 1 and Series 2 Charge**

Dear Mr. Cherry:

Advice Letter 3486-E is effective October 1, 2009.

Sincerely,

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

Julie A. Fitch, Director  
Energy Division



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

Pacific Gas and Electric Company  
77 Beale St., Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

415.973.4977  
Fax: 415.973.7226

June 30, 2009

**Advice 3486-E  
(Pacific Gas and Electric Company ID U 39 E)**

Public Utilities Commission of the State of California

**Subject: Non-Routine True-Up Mechanism Advice Filing for Dedicated  
Rate Component Series 1 and Series 2 Charge**

Pursuant to California Public Utilities Commission (CPUC) Decision (D.) 04-11-015 (Decision), Pacific Gas and Electric Company (PG&E), as servicer of the Energy Recovery Bonds (ERBs) and on behalf of PG&E Energy Recovery Funding LLC (PERF), is filing a Non-Routine True-Up Mechanism Advice Letter to apply for adjustment to the Dedicated Rate Component (DRC) Charge for series 2005-1, classes A-3, A-4 and A-5 of the ERBs (DRC Series 1 Charge) and series 2005-2, classes A-2 and A-3 of the ERBs (DRC Series 2 Charge) for the fourth quarter of 2009.

**Purpose**

The purpose of this filing is to establish an increase in the DRC Series 1 charge and DRC Series 2 Charge for rate schedules for non-exempt consumers to be in effect on October 1, 2009, to increase the likelihood that the Overcollateralization Subaccount and the Capital Subaccount reach required levels twelve months after the new DRC charges go into effect. Lower sales and earnings on the Collection Accounts for the recorded period through the end of May 2009 have resulted in a \$10.1 million shortfall in the required levels in the subaccounts, as shown in Table 1.

**Background**

In D.04-11-015, the Commission authorized PG&E to file Routine True-Up Mechanism Advice Letters on an annual basis, at least 15 days before the end of the calendar year for rate changes to be implemented on January 1. Routine True-Up Mechanism Advice Letters are those where PG&E uses the methodology found reasonable by the Commission in D.04-11-015 to revise existing DRC charges.

Non-Routine True-Up Mechanism advice filings are made when PG&E determines that existing calculations for DRC charges should be revised. D.04-11-015, Ordering Paragraph (OP) 39 states:

PG&E may submit Non-Routine True-Up Mechanism Advice Letter filings to propose revisions to the logic, structure, or components of the cash flow model in Appendix A of A.04-07-032 as modified in the body of this Financing Order. Absent a Commission resolution modifying or rejecting proposed changes to the cash flow model, PG&E or a successor servicer may implement DRC adjustments proposed in a Non-Routine True-Up Mechanism Advice Letter on the first day of the next calendar quarter following the submittal of the Advice Letter.

Using the methodology approved by the Commission in D.04-11-015, this filing uses the same assumptions in the DRC charge calculation described in Advice 3373-E filed on December 5, 2008 and made effective on January 1, 2009. The differences in Table 1 from the December 5, 2008 filing are: average monthly KWh sales to non-exempt consumers is shown for the period October 2009 to September 2010 vs. the calendar year of 2009, the shortfalls in the Overcollateralization Subaccount balances and Capital Subaccount balances are shown and ERB series 2005-1 and ERB Series 2005-2 outstanding balances are rolled forward to September 25, 2010.

<b>TABLE 1</b> <b>Input Values For Revised DRC Series 1 Charge and DRC Series 2 Charge</b>	
Average monthly kWh sales to non-exempt consumers for period October 2009 to September 2010	7,065 GWh
Percent of revenue requirement allocated to non-exempt consumers	100% (NC)
Percent of non-exempt consumers' revenue written off	0% (NC)
Percent of non-exempt consumers' billed amounts expected to be uncollected	0.26%
Percent of billed amounts collected in current month	39.62%
Percent of billed amounts collected in second month after billing	55.59%
Percent of billed amounts collected in third month after billing	3.56%
Percent of billed amounts collected in fourth month after billing	0.53%
Percent of billed amounts collected in fifth month after billing	0.28%
Percent of billed amounts collected in sixth month after billing	0.16%
Percent of billed amounts remaining less uncollectibles	99.74%
<b>ERB Series 2005-1</b>	
Monthly ongoing transaction expenses	\$11,513
Expected ERB Series 2005-1 outstanding balance as of 9/25/10	\$619,398,000
Over- or undercollection of principal from previous DRC collections to be reflected in the new DRC charges	\$0.00
Reserve Subaccount balance to be reflected in the new DRC Series 1 Charge	\$0
Shortfalls in Required Subaccount Levels forecast as of 9/25/09:	
Overcollateralization Subaccount	\$5,480,895
Capital Subaccount	\$1,064,188
<b>ERB Series 2005-2</b>	
Monthly ongoing transaction expenses	\$0
Expected ERB Series 2005-2 outstanding balance as of 9/25/10	\$308,434,000
Over- or undercollection of principal from previous DRC collections to be reflected in the new DRC charges	\$0.00
Reserve Subaccount balance to be reflected in the new DRC Series 2 Charge	\$0
Shortfalls in Required Subaccount Levels forecast as of 9/25/09:	
Overcollateralization Subaccount	\$2,189,343
Capital Subaccount	\$1,408,155

Table 2 shows the revised DRC Series 1 Charge and DRC Series 2 Charge calculated for non-exempt consumers to reach the required levels in the subaccount balances in twelve months. The information used to calculate both the DRC Series 1 Charge and DRC Series 2 Charge is shown in Attachment 2.

<b>TABLE 2</b>	
Non-exempt Consumer DRC Series 1 Charge	0.360 ¢/kWh
Non-exempt Consumer DRC Series 2 Charge	0.182 ¢/kWh

### **Description of Attachment**

Attachment 1 shows the forecast of the balances of the Overcollateralization Subaccounts, and the Capital Subaccounts, after the changes in the DRC charges submitted in this filing are implemented.

**Supplemental Advice Letter**

PG&E intends to file a supplemental advice letter that will include a complete set of revised rates before October 1, 2009. At that time, PG&E will file final revised tariffs with revised rate values.

**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 **July 20, 2009**, 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: [jjj@cpuc.ca.gov](mailto:jjj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto: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 (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](mailto:PGETariffs@pge.com)

**Effective Date**

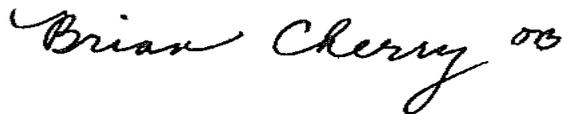
In accordance with Ordering Paragraph 39 of D.04-11-015, Non-Routine True-Up Mechanism Advice Letters for required DRC charge adjustments shall be filed at least 90 days before the end of any calendar quarter and the resulting adjustments to the DRC charges shall be implemented at the beginning of the next calendar quarter. Therefore, these DRC charges shall be effective **October 1, 2009**.

PG&E will file an annual year-end true-up advice letter on or before December 15, 2009, in accordance with D.04-11-015 with updated sales forecasts to adjust the DRC charges for calendar year 2010, effective January 1, 2010.

**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. Address changes to the General Order 96-B service list should be directed to San Heng at (415) 973-2640. 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" followed by a small mark that looks like "03".

Vice President - Regulatory Relations

Attachment:

Attachment One

# 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: Olivia Brown

Phone #: 415.973.9312

E-mail: oxb4@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) #: 3486-E

**Tier:** 2

Subject of AL: Non-Routine True-Up Mechanism Advice Filing for Dedicated Rate Component Series 1 and Series 2 Charge

Keywords (choose from CPUC listing): Compliance, Preliminary Statement

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D. 04-11-015

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 AL:

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: N/A

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

Resolution Required?  Yes  No

Requested effective date: October 1, 2009

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 proposed: 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  
jn@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**

# **ATTACHMENT 1**

Pacific Gas and Electric Company  
Attachment 1  
Page 1 of 4  
Energy Recovery Bonds 1

**Energy Recovery Bond ("ERB") Property Securitization Analysis**

*Pacific Gas and Electric Company*

*Summary Bond Information*

<u>Class</u>	<u>Avg. Life</u>	<u>Size</u>	<u>Approx. Duration</u>	<u>Benchmark Description</u>	<u>Total Spread</u>	<u>Benchmark Yield</u>	<u>Total Yield</u>	<u>Quarterly Coupons</u>	<u>Beginning Payment Window</u>	<u>Ending Payment Window</u>	<u>Expected Final Maturity</u>
1	-	-	-	EDSF	-1	3.358%	3.348%	3.320%	-	-	-
2	2.9992	25,630,899.00	2.78	Swaps	1	3.885%	3.895%	3.870%	20	53	6/25/2009
3	4.9991	320,000,000.00	4.45	Swaps	3	4.139%	4.169%	4.140%	53	68	9/25/2010
4	6.4989	468,000,000.00	5.57	Swaps	11	4.284%	4.394%	4.370%	68	89	6/25/2012
5	7.6756	184,864,000.00	6.40	Swaps	11	4.385%	4.495%	4.470%	89	95	12/25/2012

*Summary DRC Information*

<u>Years</u>	<u>Overall DRC Charge Forecast (cents/kWh)</u>
1	0.39312
2	0.35001
3	0.34916
4	0.31515
5	0.33738
6	0.35971
7	0.34163
8	0.33693
9	0.00000
10	0.00000

*Assumptions*

Expected Final Month Billing Period	95
Overcollateralization building evenly at the per quarter amount of :	304,494.19
Overcollateralization Target (in Future Dollars) by End Target Month:	9,439,320.00
Initial Deposit in Equity Account:	9,439,320.00
Servicing Fee (per annum):	0.090%
Trustee and Admin Fees (per annum):	105,000.00

*Base Case Collections Account Curves*

<u>Collection Period</u>	<u>Overall</u>
30 days	39.62%
60 days	55.59%
90 days	3.56%
120 days	0.53%
150 days	0.28%
180 days	0.16%
Uncollectible	0.260%

**Pacific Gas and Electric Company**  
**Attachment 1**  
**Page 2 of 4**  
**Energy Recovery Bonds Series 1**

Period	Date	Monthly Revenues	Collection Account	Servicing Fee	BOP OC Account	BOP SPE Account	Available Funds	A1 BOP Bal	A2 BOP Bal	A3 BOP Bal	A4 BOP Bal	A5 BOP Bal	A6 BOP Bal	Total BOP Bal
53	6/25/2009	22,133,475	65,130,958	424,769	1,203,247	9,439,320	64,662,439	-	25,630,899	320,000,000	468,000,000	184,864,000	-	998,494,899
54	7/25/2009	24,392,674	-	-	-	7,693,925	24,392,674	-	-	288,758,553	468,000,000	184,864,000	-	941,622,553
55	8/25/2009	26,214,585	-	-	-	7,693,925	50,607,259	-	-	288,758,553	468,000,000	184,864,000	-	941,622,553
56	9/25/2009	27,081,555	77,688,813	424,769	-	7,693,925	77,220,294	-	-	288,758,553	468,000,000	184,864,000	-	941,622,553
57	10/25/2009	26,276,680	-	-	-	8,375,132	26,276,680	-	-	222,386,872	468,000,000	184,864,000	-	875,250,872
58	11/25/2009	24,991,084	-	-	-	8,375,132	51,267,765	-	-	222,386,872	468,000,000	184,864,000	-	875,250,872
59	12/25/2009	24,226,609	75,494,373	424,769	-	8,375,132	75,025,854	-	-	222,386,872	468,000,000	184,864,000	-	875,250,872
60	1/25/2010	24,274,179	-	-	-	8,786,134	24,274,179	-	-	157,252,479	468,000,000	184,864,000	-	810,116,479
61	2/25/2010	24,485,662	-	-	-	8,786,134	48,759,842	-	-	157,252,479	468,000,000	184,864,000	-	810,116,479
62	3/25/2010	23,989,438	72,749,279	424,769	-	8,786,134	72,280,760	-	-	157,252,479	468,000,000	184,864,000	-	810,116,479
63	4/25/2010	23,405,536	-	-	505,362	9,439,320	23,405,536	-	-	94,936,586	468,000,000	184,864,000	-	747,800,586
64	5/25/2010	23,313,907	-	-	505,362	9,439,320	46,719,443	-	-	94,936,586	468,000,000	184,864,000	-	747,800,586
65	6/25/2010	24,130,168	70,849,611	424,769	505,362	9,439,320	70,381,092	-	-	94,936,586	468,000,000	184,864,000	-	747,800,586
66	7/25/2010	25,764,264	-	-	3,278,937	9,439,320	25,764,264	-	-	35,490,418	468,000,000	184,864,000	-	688,354,418
67	8/25/2010	27,710,438	-	-	3,278,937	9,439,320	53,474,703	-	-	35,490,418	468,000,000	184,864,000	-	688,354,418
68	9/25/2010	28,714,920	82,189,622	424,769	3,278,937	9,439,320	81,721,103	-	-	35,490,418	468,000,000	184,864,000	-	688,354,418
69	10/25/2010	27,843,848	-	-	6,698,872	9,439,320	29,642,526	-	-	-	434,534,010	184,864,000	-	619,398,010
70	11/25/2010	25,900,082	-	-	6,698,872	9,439,320	55,542,608	-	-	-	434,534,010	184,864,000	-	619,398,010
71	12/25/2010	24,341,408	79,884,016	424,769	6,698,872	9,439,320	79,415,496	-	-	-	434,534,010	184,864,000	-	619,398,010
72	1/25/2011	24,314,524	-	-	7,003,366	9,439,320	28,841,849	-	-	-	366,763,472	184,864,000	-	551,627,472
73	2/25/2011	24,046,114	-	-	7,003,366	9,439,320	52,887,964	-	-	-	366,763,472	184,864,000	-	551,627,472
74	3/25/2011	22,894,011	75,781,974	424,769	7,003,366	9,439,320	75,313,455	-	-	-	366,763,472	184,864,000	-	551,627,472
75	4/25/2011	22,293,287	-	-	7,307,861	9,439,320	26,152,967	-	-	-	301,686,938	184,864,000	-	486,550,938
76	5/25/2011	22,267,181	-	-	7,307,861	9,439,320	48,420,149	-	-	-	301,686,938	184,864,000	-	486,550,938
77	6/25/2011	23,084,161	71,504,310	424,769	7,307,861	9,439,320	71,035,791	-	-	-	301,686,938	184,864,000	-	486,550,938
78	7/25/2011	24,679,896	-	-	7,612,355	9,439,320	27,804,230	-	-	-	239,441,761	184,864,000	-	424,305,761
79	8/25/2011	26,592,109	-	-	7,612,355	9,439,320	54,396,339	-	-	-	239,441,761	184,864,000	-	424,305,761
80	9/25/2011	27,601,743	81,998,082	424,769	7,612,355	9,439,320	81,529,562	-	-	-	239,441,761	184,864,000	-	424,305,761
81	10/25/2011	26,749,107	-	-	7,916,849	9,439,320	31,486,404	-	-	-	167,635,746	184,864,000	-	352,499,746
82	11/25/2011	24,908,755	-	-	7,916,849	9,439,320	56,395,159	-	-	-	167,635,746	184,864,000	-	352,499,746
83	12/25/2011	23,477,061	79,872,220	424,769	7,916,849	9,439,320	79,403,700	-	-	-	167,635,746	184,864,000	-	352,499,746
84	1/25/2012	23,451,386	-	-	8,221,343	9,439,320	27,978,712	-	-	-	96,961,141	184,864,000	-	281,825,141
85	2/25/2012	23,537,432	-	-	8,221,343	9,439,320	51,516,143	-	-	-	96,961,141	184,864,000	-	281,825,141
86	3/25/2012	22,933,638	74,449,782	424,769	8,221,343	9,439,320	73,981,262	-	-	-	96,961,141	184,864,000	-	281,825,141
87	4/25/2012	22,387,614	-	-	8,525,837	9,439,320	24,874,636	-	-	-	28,896,551	184,864,000	-	213,760,551
88	5/25/2012	22,377,807	-	-	8,525,837	9,439,320	47,252,443	-	-	-	28,896,551	184,864,000	-	213,760,551
89	6/25/2012	23,207,984	70,460,427	424,769	8,525,837	9,439,320	69,991,908	-	-	-	28,896,551	184,864,000	-	213,760,551
90	7/25/2012	24,815,769	-	-	8,830,332	9,439,320	26,904,846	-	-	-	-	148,543,764	-	148,543,764
91	8/25/2012	26,761,914	-	-	8,830,332	9,439,320	53,666,760	-	-	-	-	148,543,764	-	148,543,764
92	9/25/2012	27,796,542	81,463,301	424,769	8,830,332	9,439,320	80,994,782	-	-	-	-	148,543,764	-	148,543,764
93	10/25/2012	26,929,708	-	-	9,134,826	9,439,320	31,158,693	-	-	-	-	73,742,437	-	73,742,437

**Pacific Gas and Electric Company  
Attachment 1  
Page 3 of 4  
Energy Recovery Bonds Series 2**

**Energy Recovery Bond ("ERB Series 2") Property Securitization Analysis**

*Pacific Gas and Electric Company*

*Summary Bond Information*

<u>Class</u>	<u>Avg. Life</u>	<u>Size</u>	<u>Approx. Duration</u>	<u>Benchmark Description</u>	<u>Total Spread</u>	<u>Benchmark Yield</u>	<u>Total Yield</u>	<u>Quarterly Coupons</u>	<u>Beginning Payment Window</u>	<u>Ending Payment Window</u>	<u>Expected Final Maturity</u>
1	2.0031	1,834,921.00	1.86	Swaps	-3	4.898%	4.868%	4.850%	6	42	6/25/2009
2	4.9985	372,000,000.00	4.33	Swaps	2	5.038%	5.058%	5.030%	42	75	3/25/2012
3	6.8276	121,461,000.00	5.67	Swaps	6	5.091%	5.151%	5.120%	75	84	12/25/2012

*Summary DRC Information*

<u>Years</u>	<u>Overall DRC Charge Forecast (cents/kWh)</u>
1	0.20915
2	0.16613
3	0.16361
4	0.16556
5	0.18227
6	0.17127
7	0.16920
8	0.00000
9	0.00000
10	0.00000

*Assumptions*

Expected Final Month Billing Period	84
Overcollateralization building evenly at the per quarter amount of :	156,381.67
Overcollateralization Target (in Future Dollars) by End Target Month:	4,222,305.00
Initial Deposit in Equity Account:	4,222,305.00
Servicing Fee (per annum):	0.090%
Trustee and Admin Fees (per annum):	35,000.00

*Base Case Collections Account Curves*

<u>Collection Period</u>	<u>Overall</u>
30 days	39.62%
60 days	55.59%
90 days	3.56%
120 days	0.53%
150 days	0.28%
180 days	0.16%
Uncollectible	0.260%



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

Aglet	Day Carter Murphy	Norris & Wong Associates
Alcantar & Kahl	Defense Energy Support Center	North Coast SolarResources
Anderson & Poole	Department of Water Resources	Northern California Power Association
Arizona Public Service Company	Department of the Army	Occidental Energy Marketing, Inc.
BART	Dept of General Services	OnGrid Solar
BP Energy Company	Division of Business Advisory Services	Praxair
Barkovich & Yap, Inc.	Douglas & Liddell	R. W. Beck & Associates
Bartle Wells Associates	Douglass & Liddell	RCS, Inc.
C & H Sugar Co.	Downey & Brand	Recon Research
CA Bldg Industry Association	Duke Energy	SCD Energy Solutions
CAISO	Dutcher, John	SCE
CLECA Law Office	Ellison Schneider & Harris LLP	SMUD
CSC Energy Services	FPL Energy Project Management, Inc.	SPURR
California Cotton Ginners & Growers Assn	Foster Farms	Santa Fe Jets
California Energy Commission	G. A. Krause & Assoc.	Seattle City Light
California League of Food Processors	GLJ Publications	Sempra Utilities
California Public Utilities Commission	Goodin, MacBride, Squeri, Schlotz & Ritchie	Sierra Pacific Power Company
Calpine	Green Power Institute	Silicon Valley Power
Cameron McKenna	Hanna & Morton	Southern California Edison Company
Cardinal Cogen	Hitachi	Sunshine Design
Casner, Steve	International Power Technology	Sutherland, Asbill & Brennan
Chamberlain, Eric	Intestate Gas Services, Inc.	Tabors Caramanis & Associates
Chevron Company	Los Angeles Dept of Water & Power	Tecogen, Inc.
Chris, King	Luce, Forward, Hamilton & Scripps LLP	Tiger Natural Gas, Inc.
City of Glendale	MBMC, Inc.	Tioga Energy
City of Palo Alto	MRW & Associates	TransCanada
City of San Jose	Manatt Phelps Phillips	Turlock Irrigation District
Clean Energy Fuels	Matthew V. Brady & Associates	U S Borax, Inc.
Coast Economic Consulting	McKenzie & Associates	United Cogen
Commerce Energy	Merced Irrigation District	Utility Cost Management
Commercial Energy	Mirant	Utility Specialists
Consumer Federation of California	Modesto Irrigation District	Verizon
Crossborder Energy	Morgan Stanley	Wellhead Electric Company
	Morrison & Foerster	Western Manufactured Housing Communities Association (WMA)
Davis Wright Tremaine LLP	New United Motor Mfg., Inc.	eMeter Corporation