

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 1, 2012

**Advice Letter 3962-E**

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

**Subject: Amendment to Existing Qualifying Facility Power Purchase Agreement for Procurement of Eligible Renewable Energy Resources Between Collins Pine Company and PG&E**

Dear Mr. Cherry:

Advice Letter 3962-E is effective April 19, 2012 per Resolution E-4485.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, Director  
Energy Division



November 30, 2011

**Advice 3962-E**  
(Pacific Gas and Electric Company ID U39 E)

Public Utilities Commission of the State of California

**Subject: Amendment to Existing Qualifying Facility Power Purchase Agreement for Procurement of Eligible Renewable Energy Resources Between Collins Pine Company and Pacific Gas and Electric Company**

## **I. INTRODUCTION**

### **A. Purpose**

Pacific Gas and Electric Company (“PG&E”) seeks the California Public Utilities Commission’s (“Commission”) approval of an amendment and a letter agreement (collectively the “Amendment”) to a Qualifying Facility (“QF”) Power Purchase Agreement (“PPA”) that PG&E has executed with Collins Pine Company (“Collins Pine”). The PPA is a 30-year Interim Standard Offer 2 (“SO2”) contract executed on July 12, 1984. Collins Pine is an existing 12 megawatt (“MW”) biomass facility (“Facility”) located in Chester, California.

The Amendment replaces the current variable short-run avoided cost (“SRACVAR”) energy price term in the PPA with a fixed price in exchange for other beneficial terms and conditions. Biomass facilities, such as Collins Pine, have cost exposures very different from fossil-fuel based QFs. SRACVAR pricing protects QFs using natural gas fuel against fluctuations in gas market prices, but some renewable QFs with little or no exposure to gas prices wish to avoid the price fluctuations inherent in SRACVAR pricing. The Amendment’s fixed energy price provides Collins Pine with price stability and revenue certainty, which should encourage continued production of Renewables Portfolio Standard (“RPS”)-eligible energy for the remainder of the PPA term. It also provides PG&E’s customers with greater price certainty and less volatility than fossil-fuel based pricing.

The Amendment will be effective upon receipt of Commission approval and satisfaction or waiver of other Conditions Precedent. The Amendment will terminate on May 12, 2016 (which is the expiration date of the existing PPA) and thus has a term of less than five years. Therefore, the Amendment may be approved through the advice letter process according to Decision (“D”) 06-12-009.<sup>1</sup>

The Commission’s standards for reviewing QF contract amendments and modifications were discussed in D.99-02-085.<sup>2</sup> In general, the Commission examines a QF contract amendment or modification to determine if there are customer benefits that result from the amendment or modification.<sup>3</sup> For the reasons described below and in Confidential Appendix B, the Amendment provides customer benefits and thus should be approved by the Commission. PG&E therefore submits the Amendment for Commission approval to establish the reasonableness of its terms and for authorization to recover its payments and any other costs incurred under the Amendment through its Energy Resource Recovery Account (“ERRA”).

## **B. Subject of the Advice Letter**

Collins Pine has delivered electricity generated by the Facility under the PPA since the Facility began operations and started delivering energy in 1984. The Facility burns biomass for its fuel. The continued operation of biomass-fueled facilities minimizes open burning or decomposition of the wood waste used for fuel, which would generate higher levels of greenhouse gas emissions and other air borne pollutants if not consumed as fuel, and in some instances results in the diversion of wood waste from landfills.

Collins Pine receives payments for energy and capacity under the existing PPA. Until August 2011, Collins Pine was receiving a fixed energy price under a PPA amendment that resulted from a 2006 settlement between PG&E and the Independent Energy Producers Association (“IEP Amendment”).<sup>4</sup> Under the terms of the settlement, when the IEP Amendment’s fixed price period expired in August 2011, the price for energy reverted to SRACVAR. SRACVAR is the Variable Energy Price pursuant to the IEP Settlement adopted by the Commission in D.06-07-032, which is calculated as Heat

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<sup>1</sup> See D.06-12-009 at 7.

<sup>2</sup> See D.99-02-085, 85 CPUC2d 158, 167 (1999).

<sup>3</sup> In earlier decisions, the Commission referred to “commensurate” benefits. In other decisions, the Commission referred to customer indifference. *Id.*, at pp. 166-167 (describing Commission decisions and different descriptions of customer benefit standards).

<sup>4</sup> The settlement agreement and associated amendments were approved in 2006 by the Commission in D.06-07-032.

Rate\* Monthly Burner-Tip Gas Price\*TOD factor + Variable Operations and Maintenance adder, and is updated monthly. Firm capacity payments are based on weighting factors used to increase firm capacity payments during the summer season, May through October (“Seasonal Period A”). Approximately 80 percent of the annual firm capacity payment is allocated to the Peak and Partial Peak hours of Seasonal Period A and the remaining 20 percent is allocated to such hours during the winter months November through April (“Seasonal period B”). The Amendment replaces SRACVAR pricing with a fixed energy price. Capacity payments are unchanged by the Amendment.

The fixed energy price under the Amendment eliminates exposure to fluctuating gas market prices that Collins Pine would otherwise face under SRACVAR pricing or under short-run avoided cost (“SRAC”) pricing available under the Qualifying Facility and Combined Heat and Power Program Settlement (“QF/CHP Settlement”) approved by D.10-12-035. As a result, the Amendment provides price stability for Collins Pine, and corresponding revenue certainty for its procurement of biomass fuel, the price of which is not tied to the price of natural gas. This should encourage the Facility to continue deliveries until the term of the Amendment expires on May 12, 2016, which will provide PG&E’s customers with RPS-eligible energy at a reasonable price. The Facility is expected to deliver approximately 34 gigawatt-hours (“GWh”) of RPS-eligible power to PG&E each year during the term of the Amendment. The Amendment will also provide customers with greater price certainty and less volatility than the otherwise applicable fossil-fuel based SRACVAR and SRAC.

A detailed explanation of the terms of the Amendment is provided in Confidential Appendix B. This includes a discussion of the fixed energy price and other terms and conditions that provide value to PG&E and its customers. Confidential Appendix B also demonstrates that the price and market value of the amended PPA are reasonable by using a net market value (“NMV”) comparison of other biomass transactions that have been executed and other alternatives for procurement of RPS-eligible resources.

### C. General Facility Description

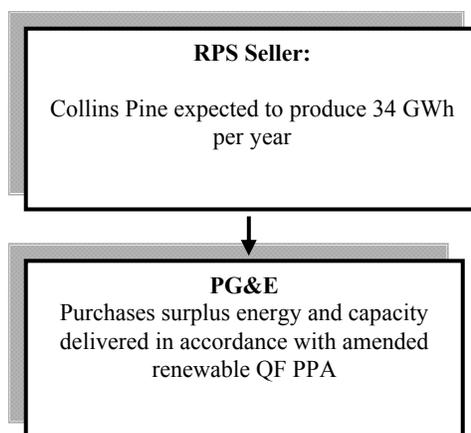
The following table summarizes the primary features of the Facility:

<b>Facility Name</b>	Collins Pine Company
<b>Technology</b>	Biomass
<b>Capacity (MW)</b>	12 MW nameplate capacity
<b>Capacity Factor</b>	Approximately 32 percent
<b>Expected Generation (GWh/Year)</b>	Approximately 34 GWh/year
<b>Amendment Effective date</b>	Upon Commission Approval and satisfaction or waiver of other

	Conditions Precedent
<b>Amendment Term (Years)</b>	Expires on May 12, 2016
<b>Location (City and State)</b>	Chester, CA
<b>Control Area (e.g., California Independent System Operator (“CAISO”), Bonneville Power Administration (“BPA”))</b>	CAISO

#### D. General Deal Structure

**Figure 1: PPA Delivery Structure**



#### E. Confidentiality

In support of this Advice Letter, PG&E has provided the confidential information listed under Section III.B, “Request for Confidential Treatment,” below. This information includes the Amendment and other information that more specifically describes the rights and obligations of the parties. This information is being submitted in the manner directed by D.08-04-023 and the August 22, 2006, Administrative Law Judge’s Ruling Clarifying Interim Procedures for Complying with D.06-06-066 to demonstrate the confidentiality of the material and to invoke the protection of confidential utility information provided under either the terms of the IOU Matrix, Appendix 1 of D.06-06-066 and Appendix C of D.08-04-023, or General Order 66-C. A separate Declaration Seeking Confidential Treatment is being filed concurrently with this Advice Letter.

## II. CONSISTENCY WITH COMMISSION DECISIONS

### A. Consistency With PG&E’s Adopted RPS Procurement Plan

Senate Bill 2 in the First Extraordinary Session of the 2011 Legislative Session (“SB 2 1X”) requires load-serving entities (“LSEs”) to gradually increase procurement of

renewable resources until such deliveries meet 33 percent of their retail sales. The statute creates a compliance structure that includes both enforceable compliance period targets and unenforceable reasonable progress targets for individual years through 2020. The reasonable progress targets will be used to establish the total enforceable quantities of renewable deliveries that each LSE will need to procure by the end of each compliance period. For instance, while SB 2 1X requires that LSEs procure an average of 20% of retail sales from renewable resources for the first compliance period of January 1, 2011, to December 31, 2013,<sup>5</sup> the Commission has yet to define the reasonable progress targets for the second and third compliance periods (2014-2016 and 2017-2020, respectively). Once the Commission has established the reasonable progress targets for these later compliance periods, LSEs will be able to calculate the percentages of their total sales for each respective period that represents the enforceable compliance period targets.<sup>6</sup>

PG&E's 2011 Renewable Energy Procurement Plan ("2011 RPS Plan") was approved by D.11-04-030 on April 20, 2011. In the 2011 RPS Plan, PG&E indicated that it was "pursuing both short- and long-term contracts to meet [the] statutory goals" set forth in SB 2 1X.<sup>7</sup> The amended PPA provides price stability to Collins Pine, which should encourage continued production of RPS-eligible energy for the remainder of the PPA term. This will help PG&E to maintain its baseline RPS portfolio, which provides a foundation from which PG&E can make progress toward compliance with the 33 percent RPS program. The Amendment therefore meets the needs defined in the 2011 RPS Plan.

PG&E's 2011 RPS Solicitation Protocol requests participants to describe how their projects improve environmental quality, stimulate sustainable economic development, and provide tangible demonstrable benefits to communities with low-income populations.<sup>8</sup> These considerations are based on the policies underlying the RPS statute.<sup>9</sup> Since the Facility is already built and interconnected to the electric grid, it will not pose any of the environmental concerns associated with the construction and interconnection of a new generating facility.

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<sup>5</sup> Public Utilities Code Section 399.15(b)(2)(B).

<sup>6</sup> *Id.* at Section 399.15(b)(2)(C). Administrative Law Judge Simon has issued a proposed decision setting procurement quantity targets for the 33 percent RPS program, which is currently on the agenda for the Commission's December 1, 2011 meeting.

<sup>7</sup> PG&E's 2011 RPS Plan, p. 8.

<sup>8</sup> PG&E's "RPS 2011 Solicitation Protocol," p. 25, "Other Project Attributes."

<sup>9</sup> See Public Utilities Code Section 399.13(a)(7).

## **B. The Commission Has Approved Fixed Energy Pricing for QF Contracts**

The Commission has previously found that it is reasonable to pay QFs fixed prices. After the energy crisis of 2001, the Commission adopted an SRAC price that was intended to encourage QFs to resume deliveries. At that time, the Commission found that a proposal to replace the monthly SRAC with a five-year fixed energy price would provide greater incentives to QFs than energy prices that varied each month. The fixed-price structure was also found to provide utility customers greater price certainty and less volatility over the five-year period<sup>10</sup> and to provide the utility with greater predictability of revenue.<sup>11</sup>

The Commission approved a fixed energy price settlement a second time in its proceeding to promote consistency in QF pricing, R. 04-04-025. In that case, PG&E and IEP reached a settlement that included an SRAC price and either fixed or variable pricing. Fixed SRAC pricing for five years was offered to renewable energy generators. Under the settlement, non-fossil fuel QFs were offered a five-year fixed energy price of \$64.50/MWh, escalating at 1% per year. The total settlement package was found to be consistent with Commission standards for the approval of settlement agreements and was approved in D.06-07-032. The Amendment offers a fixed energy price to a renewable QF for a term less than five years, and should likewise be approved.

## **C. The Amendment is Consistent with the QF/CHP Settlement Approved in D. 10-12-035**

The terms and conditions of the Amendment are consistent with the QF/CHP Settlement approved in D.10-12-035. A detailed discussion is provided in Confidential Appendix B.

## **D. Procurement Review Group Participation**

On July 12, 2011, PG&E presented its procurement review group (“PRG”) with a description of its existing QF biomass portfolio and strategy for retaining existing QF resources. Further discussion is included in Confidential Appendix B.

# **III. REGULATORY PROCESS**

## **A. Requested Effective Date**

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<sup>10</sup> D.01-06-015, Conclusion of Law 2.

<sup>11</sup> *Id.*, Finding of Fact 5.

PG&E requests that this advice filing be approved on or before April 1, 2012. Commission action by this date will provide Seller with sufficient time to elect an option under the QF/CHP Settlement if the Amendment is not approved. PG&E submits this request as a Tier 3 advice letter.

## **B. Request for Confidential Treatment**

### **Confidential Attachments:**

In support of this Advice Letter, PG&E provides the following confidential supporting documentation:

- Confidential Appendix A - Amendment to Power Purchase Agreement and Letter Agreement
- Confidential Appendix B - Contract Amendment Terms and Conditions Explained

## **IV. REQUEST FOR COMMISSION APPROVAL**

PG&E requests that the Commission issue a resolution no later than April 1, 2012, that:

1. Approves the Amendment without modification as just and reasonable; and,
2. Determines that all costs associated with the Amendment may be recovered through PG&E's ERRRA.

### **Protests:**

Anyone wishing to protest this filing may do so by sending a letter by **December 20, 2011**, which is **20** days from the date of this filing. The protest must state the grounds upon which it is based, including such items as financial and service impact, and it should be submitted expeditiously. Protests should be mailed to:

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

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

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

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

Pacific Gas and Electric Company  
Attention: Brian K. Cherry  
Vice President, Regulation and Rates  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-6520  
E-mail: PGETariffs@pge.com

**Effective Date:**

PG&E requests that this advice filing be approved on or before April 1, 2012. PG&E submits this request as a Tier 3 advice letter.

**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 R.11-05-005 and R.10-05-006. Non-market participants who are members of PG&E's Procurement Review Group and have signed appropriate Non-Disclosure Certificates will also receive the Advice Letter and accompanying confidential attachments by overnight mail. Address changes to the GO 96-B service list and electronic approvals should be directed to e-mail PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. 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 stylized flourish.

Vice President – Regulation and Rates

cc: Service List for R.11-05-005  
Service List for R.10-05-006  
Andrew Schwartz – Energy Division  
Cem Turhal – Energy Division

Attachments

**Limited Access to Confidential Material:**

The portions of this Advice Letter marked Confidential Protected Material are submitted under the confidentiality protections of Sections 583 and 454.5(g) of the Public Utilities Code and General Order 66-C. This material is protected from public disclosure because it consists of, among other items, the Amendment itself, price information, and analysis of the proposed Amendment, which are protected pursuant to D.06-06-066 and D.08-04-023. A separate Declaration Seeking Confidential Treatment regarding the confidential information is filed concurrently herewith. Please see Section III.B above for the list of confidential attachments.

# 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: Jennifer Dowdell or Greg Backens

Phone #: 415-973-2904 or 415-973-4390

E-mail: [jkd5@pge.com](mailto:jkd5@pge.com) or [gab4@pge.com](mailto:gab4@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) #: **3962-E**

**Tier: 3**

Subject of AL: **Amendment to Existing Qualifying Facility Power Purchase Agreement for Procurement of Eligible Renewable Energy Resources Between Collins Pine Company and Pacific Gas and Electric Company**

Keywords (choose from CPUC listing): Qualifying Facility, Procurement

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.06-12-009

Does AL replace a withdrawn or rejected AL? N/A

If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Is AL requesting confidential treatment? Yes.

If so, what information is the utility seeking confidential treatment for: Please see attached Matrix

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: Hugh Merriam, 415-973-1269

Resolution Required?  Yes  No

Requested effective date: **April 1, 2012**

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**

**[jnj@cpuc.ca.gov](mailto:jnj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)**

**Pacific Gas and Electric Company**

**Attn: Brian K. Cherry, Vice President, Regulation and Rates**

**77 Beale Street, Mail Code B10C**

**P.O. Box 770000**

**San Francisco, CA 94177**

**E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)**

**DECLARATION OF HUGH M. MERRIAM  
SEEKING CONFIDENTIAL TREATMENT  
FOR CERTAIN DATA AND INFORMATION  
CONTAINED IN ADVICE LETTER 3962-E  
(PACIFIC GAS AND ELECTRIC COMPANY - U 39 E)**

I, Hugh M. Merriam, declare:

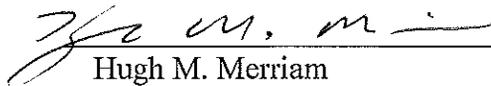
1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since 1983. My current title is Manager within PG&E's Energy Procurement organization. In this position, my responsibilities include negotiating new and amended Power Purchase Agreements. In carrying out these responsibilities, I have acquired knowledge of PG&E's contracts with numerous counterparties and have also gained knowledge of the operations of electricity sellers in general. Through this experience, I have become familiar with the type of information that would affect the negotiating positions of electricity sellers with respect to price and other terms, as well as with the type of information that such sellers consider confidential and proprietary.

2. Based on my knowledge and experience, and in accordance with Decision ("D.") 08-04-023 and the August 22, 2006 "Administrative Law Judge's Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066," I make this declaration seeking confidential treatment of Appendices A, and B to PG&E's Advice Letter 3962-E submitted on November 30, 2011. By this Advice Letter, PG&E is seeking this Commission's approval of an amendment to its Qualifying Facility Power Purchase Agreement with Collins Pine Company.

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 of D.06-06-066 and Appendix C of D.08-04-023 (the "IOU Matrix"), and/or constitutes information

that should be protected under General Order 66-C. The matrix also specifies the category or categories in the IOU Matrix to which the data and information corresponds, if applicable, 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, if applicable; (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 in the attached matrix that is pertinent to this filing.

I declare under penalty of perjury, under the laws of the State of California, that to the best of my knowledge the foregoing is true and correct. Executed on November 30, 2011 at San Francisco, California.

  
\_\_\_\_\_  
Hugh M. Merriam

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)**

**Advice Letter 3962-E**

**November 30, 2011**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION PER DECISION 06-06-066 AND DECISION 08-04-023**

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
<b>Document: Advice Letter 3962-E</b>							
Appendix A – Amendment and Letter Agreement	Y	Item VII B) Contracts and power purchase agreements between utilities and non-affiliated third parties; General Order (“GO”) 66-C.	Y	Y	Y	This Appendix contains the amendment and the letter agreement (together, the “Amendment”). Disclosure of the Amendment would provide valuable market sensitive information to competitors. Individual contract information, is protected from disclosure by Item VII B) in the IOU Matrix. In addition, the Amendment is subject to a confidentiality agreement between the parties which prohibits either party from making an unauthorized disclosure of the information within the Amendment. The Amendment cannot be aggregated, redacted, summarized, masked or otherwise protected to allow partial public disclosure without violating the non-disclosure agreement. PG&E has already summarized the terms of the Amendment in more general terms in the body of the Advice Letter.	For information covered under Item VII B), remain confidential for three years.  For information covered by General Order 66-C, remain confidential indefinitely.
Appendix B - Contract Amendment Terms and Conditions Explained	Y	Item V C) LSE Total Energy Forecast Bundled Customer (MWh).	Y	Y	Y	This Appendix describes the Amendment terms, analyzes the effect of the Amendment on the terms of the existing Power Purchase Agreement (“PPA”). Disclosure of this information would provide valuable market sensitive information to competitors. Individual contract information is protected from disclosure by Item VII B) in the IOU Matrix. Disclosure	For information covered under Items V C), VI B), VII B), VII F), VII G), and VII (un-

		<p>Item VI B) Utility Bundled Net Open (Long or Short) Position for Energy (MWh).</p> <p>Item VII B) Contracts and power purchase agreements between utilities and non- affiliated third parties.</p> <p>Item VII G) Renewable Resource Contracts under RPS program - Contracts without SEPs.</p> <p>Item VII – Score sheets, analyses, evaluation of proposed RPS projects</p> <p>GO 66-C</p>			<p>would inhibit generators from providing PG&amp;E with the information the Commission needs for its reasonableness review and hamper negotiations between PG&amp;E and the seller.</p> <p>The Amendment is subject to a confidentiality agreement between the parties which prohibits either party from making an unauthorized disclosure of the information within the Amendment. The description of the Amendment in the Appendix consists only of information that is commercially sensitive and limited information from the public advice letter which is necessary to provide a logical context for the confidential information.</p>	<p>numbered category following VII G)), remain confidential for three years.</p> <p>For information covered under Item VIII A) remain confidential until after final contracts submitted to CPUC for approval.</p> <p>For information covered under Item VIII B), remain confidential for three years after winning bidders selected.</p> <p>For information covered by General Order 66-C, remain confidential indefinitely.</p>
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**PG&E Gas and Electric  
Advice Filing List  
General Order 96-B, Section IV**

AT&T	Department of Water Resources	North Coast SolarResources
Alcantar & Kahl LLP	Dept of General Services	Northern California Power Association
Ameresco	Douglass & Liddell	Occidental Energy Marketing, Inc.
Anderson & Poole	Downey & Brand	OnGrid Solar
Arizona Public Service Company	Duke Energy	Praxair
BART	Economic Sciences Corporation	R. W. Beck & Associates
Barkovich & Yap, Inc.	Ellison Schneider & Harris LLP	RCS, Inc.
Bartle Wells Associates	Foster Farms	Recurrent Energy
Bloomberg	G. A. Krause & Assoc.	SCD Energy Solutions
Bloomberg New Energy Finance	GLJ Publications	SCE
Boston Properties	GenOn Energy, Inc.	SMUD
Braun Blaising McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	SPURR
Brookfield Renewable Power	Green Power Institute	San Francisco Public Utilities Commission
CA Bldg Industry Association	Hanna & Morton	Seattle City Light
CLECA Law Office	Hitachi	Sempra Utilities
CSC Energy Services	In House Energy	Sierra Pacific Power Company
California Cotton Ginners & Growers Assn	International Power Technology	Silicon Valley Power
California Energy Commission	Intestate Gas Services, Inc.	Silo Energy LLC
California League of Food Processors	Lawrence Berkeley National Lab	Southern California Edison Company
California Public Utilities Commission	Los Angeles Dept of Water & Power	Spark Energy, L.P.
Calpine	Luce, Forward, Hamilton & Scripps LLP	Sun Light & Power
Cardinal Cogen	MAC Lighting Consulting	Sunshine Design
Casner, Steve	MBMC, Inc.	Sutherland, Asbill & Brennan
Chris, King	MRW & Associates	Tabors Caramanis & Associates
City of Palo Alto	Manatt Phelps Phillips	Tecogen, Inc.
City of Palo Alto Utilities	McKenzie & Associates	Tiger Natural Gas, Inc.
City of San Jose	Merced Irrigation District	TransCanada
City of Santa Rosa	Modesto Irrigation District	Turlock Irrigation District
Clean Energy Fuels	Morgan Stanley	United Cogen
Coast Economic Consulting	Morrison & Foerster	Utility Cost Management
Commercial Energy	NLine Energy, Inc.	Utility Specialists
Consumer Federation of California	NRG West	Verizon
Crossborder Energy	NaturEner	Wellhead Electric Company
Davis Wright Tremaine LLP	Navigant Consulting	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy	Norris & Wong Associates	eMeter Corporation
Defense Energy Support Center	North America Power Partners	