

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 14, 2012

Advice Letter 4140-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: Methodology for Calculations of Non-Bypassable Charges for Mountain House Customers (Modesto Irrigation District)

Dear Mr. Cherry:

Advice Letter 4140-E is effective as of December 13, 2012.

Sincerely,

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

Edward F. Randolph, Director
Energy Division

November 13, 2012

Advice 4140-E

(Pacific Gas and Electric Company ID U39E)

Public Utilities Commission of the State of California

Subject: Methodology for Calculation of Non-Bypassable Charges for Mountain House Customers (Modesto Irrigation District)

This filing is made in accordance with Decision (“D.”) 04-03-036, dated March 16, 2004, for Pacific Gas and Electric Company’s (“PG&E”) Application (“A.”) 03-02-005 pertaining to the authorization to lease and sell certain electric distribution facilities serving the Mountain House Area to Modesto Irrigation District (“MOD”). PG&E hereby files the annual advice letter to describe its calculations and methodologies for determining applicable non-bypassable charges (“NBCs”) for customers in the Mountain House Area of San Joaquin County, California, served by MOD.

Background

Pursuant to Public Utilities Code § 9610, a total of 137 Mountain House customers departed PG&E’s service territory on January 1, 2001, and began receiving electric service from MOD. In D.04-03-036 (issued in A.03-02-005), the California Public Utilities Commission (“CPUC” or “Commission”) approved, among other things, an agreement between PG&E and MOD for the lease of certain electric distribution facilities in the Mountain House area (“the Lease Agreement”). The Lease Agreement provides that MOD will pay NBCs on behalf of the departing customers. Ordering Paragraph (“OP”) 6 of D.04-03-036 requires that PG&E shall annually file an advice letter that contains the proposed calculations and methodologies for determining the amount of NBCs to be paid by MOD for the year at least 90 days before the due date for MOD’s payment of the NBCs for approval by the Commission’s Energy Division. This Advice Letter fulfills PG&E’s requirement as detailed in OP 6 of D.04-03-036.

Methodology and Illustrative Calculations

Attachment 1 to this filing is PG&E’s statement of methodology for calculating NBCs to be paid by MOD on behalf of departing customers.

Consistent with Paragraph 6.2 of the Lease Agreement, on or before January 31, 2013, PG&E will provide MOD with PG&E's calculation of the 2012 NBC bill for the Mountain House customers that departed PG&E's service territory on January 1, 2001, and began receiving electric service from MOD. This calculation will cover NBCs with interest for the period from January 1, 2012 through December 31, 2012.

Commission Resolution ("Res.") E-3903 authorized PG&E to calculate and collect "the amount of ND [Nuclear Decommissioning] charges that it should have but did not collect from [departing] customers from the date Schedule E-DEPART expired through the effective date of this Resolution," to amortize this amount over a three-year period, and to bill [departing] customers accordingly. (Res. E-3903, page 10). As the 2008 calculation included the final portion of amortized ND charges, no such charges are included in this bill. The 2012 calculation includes ND charges for January 1, 2012 through December 31, 2012.

Commission Resolution E-3999 authorized PG&E to calculate and collect current and past Competition Transition Charges (CTCs). Because "some transferred MDL [Municipal Departing Load] customers may owe large amounts, it is appropriate to allow the customer the option to pay off any amounts owed over a 36-month period." (Res. E-3999, page 57). Accordingly, PG&E's calculation for 2010 included the final installment of the amortized CTCs for the Mountain House customers from January 31, 2010 to February 28, 2010. The CTCs from January 1, 2012 through December 31, 2012, are included in the total NBCs for 2012.

Some of the 137 transferred accounts have subsequently gone out of existence, to make way for new development. Accordingly, PG&E will adjust the NBCs for the period January 1, 2012, through December 31, 2012, to account for these removals (and their removal dates), and PG&E will exclude these removed accounts from future NBC billings. As noted in Attachment 1, Mountain House customers are not obligated to pay the Department of Water Resources ("DWR")-related components of the Cost Responsibility Surcharge ("CRS") imposed by D.03-07-028, since they departed prior to the February 1, 2001, threshold date adopted in that decision.¹

¹ See D.03-07-028, Ordering Paragraph 2. For PG&E, the Cost Responsibility Surcharge (CRS) adopted by D.03-07-028 consists of the DWR Bond Charge (DWRBC), the DWR Power Charge (DWRPC), and the Competition Transition Charge (CTC). The DWRBC and DWRPC components of the CRS only apply to customers who departed PG&E service after February 1, 2001, and thus not to Mountain House customers (who departed on the January 1, 2001 transfer date). However, Mountain House customers are obligated to pay the CTC component of the CRS, which is applicable to customers who depart after December 20, 1995. Per Public Utilities Code Section 848(k), Mountain House customers are not obligated to pay the Energy Cost Recovery Amount (ECRA) charge.

Protests

Anyone wishing to protest this advice letter may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **December 3, 2012**, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@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 shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) 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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter. (General Order 96-B, Section 7.4.) The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this advice filing become effective on regular notice, December 13, 2012, which is 30 days after the date of this submission.

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 and Service List A.03-02-005. Address changes to the General Order 96-B service list and all 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>.



Vice President – Regulatory Relations

cc: Service List A.03-02-005
Joy A. Warren, Modesto Irrigation District

Attachments: Attachment 1 – Methodology for Calculation of 2012 Non-Bypassable Charges for Mountain House Customers

Attachment 2 - Preliminary 2012 Non-Bypassable Charge Invoice for Mountain House Customers

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 E)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Kimberly Chang

Phone #: (415) 972-5472

E-mail: kwcc@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) #: **4140-E**

Tier: **2**

Subject of AL: **Methodology for Calculations of Non-Bypassable Charges for Mountain House Customers (Modesto Irrigation District)**

Keywords (choose from CPUC listing): Compliance

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.04-03-036

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:

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

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

Resolution Required? Yes No

Requested effective date: **December 13, 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

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:

California Public Utilities Commission

Energy Division

EDTariffUnit

505 Van Ness Ave., 4th Flr.

San Francisco, CA 94102

E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Brian 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:
Methodology for Calculation of 2012 Non-
Bypassable Charges for Mountain House
Customers

Methodology for Calculation of 2012 Non-Bypassable Charges For Mountain House Customers

Pursuant to Ordering Paragraph 6 of Decision 04-03-036, this attachment describes PG&E's method of calculating the non-bypassable charge (NBC) obligations for 2012 associated with PG&E's Mountain House customers that departed to Modesto Irrigation District (MOD).

A total of 137 Mountain House customers departed PG&E service on January 1, 2001 and began receiving electric service from MOD. Just prior to their departure, PG&E took a "snapshot" of each customer's billing determinants for the period of January 2000 to December 2000 (i.e., the 12 months immediately prior to their departure on January 1, 2001).

Some of the 137 transferred accounts have subsequently gone out of existence, to make way for new development. Accordingly, PG&E will adjust the NBCs for the period January 1, 2012 through December 31, 2012 to account for these removals (and their removal dates), and PG&E will exclude these removed accounts from future NBC billings.

The NBC obligations of the Mountain House customers include Competition Transition Charges (CTCs, per Public Utilities Code Sections 367, 368, 375 and 376), Trust Transfer Amount (TTA, per Code Section 840(d)),¹ and Nuclear Decommissioning (ND, per Code Section 379) Charges.

CTCs — The opportunity for utilities to recover and the obligation for customers to pay CTCs has been established both by Commission policy decisions and California law.² Except for those specific activities expressly exempted by the California legislature or the Commission, these costs are to be paid by all energy consumers. Commission Resolution E-3999 authorized PG&E to calculate and collect current and past CTCs. The amortized CTCs for the Mountain House customers were from March 31, 2002 (the date the E-DEPART tariff expired) through December 31, 2006. The final installment of the amortized CTCs for Mountain House customers from January 31, 2010 through February 28, 2010 were paid in 2010. (the first installment of amortized CTCs was billed from March 31, 2007 through December 31 2007, the second installment was billed

¹ Preliminary Statements Part AS and Part AT of PG&E's electric tariffs establish a Fixed Transition Amount (FTA) charge and Rate Reduction Bond Memorandum Account (RRBMA) for residential and small commercial customers who received the 10 percent rate reduction on January 1, 1998, as mandated in Assembly Bill (AB) 1890 (Code § 368 (a)).

² Electric Restructuring Policy Decision (D.95-12-063), as modified by the Revised Policy Decision (D.96-01-009), primarily Conclusions of Law 54 and 58, and Ordering Paragraph 28, and AB 1890, primarily Code Sections 367, 368, 375, 376 and 840(d). (A.00-01-056)

from January 31, 2008 to December 31, 2008, the third installment was billed from January 31, 2009 to December 31, 2009 and the final portion of the three-year amortization period was billed over the first two months of 2010, January 31, 2010 through February 28, 2010). The CTCs from January 1, 2012, through December 31, 2012, are included in the total NBCs for 2012.

TTA Charges — The TTA charge is comprised of FTA (Fixed Transition Amount) and RRBMA (Rate Reduction Bond Memorandum Account) and only applicable to PG&E's residential and small commercial customers, to pay back rate reduction bonds issued to finance a 10 percent reduction in rates for these customers. The last payment for TTA was made in 2007. Effective through 2008, adjustments of TTA have been negative and were reflected on the bill as a credit, due to a credit balance in the RRBMA. Any remaining credit balance in the RRBMA was amortized in 2009 rates so no further adjustments (credits) are required. Therefore, the TTA credit is no longer included in the calculation of the total NBC's for 2012.

ND Charges — ND costs are separately identified in Code Section 379 as a non-bypassable charge that will continue until those costs are fully recovered. Per PG&E Advice 1614-E, filed October 11, 1996, PG&E's Commission-jurisdictional nuclear decommissioning accrual is approximately \$33 million per year.³ Per Commission Resolution E-3903, PG&E is authorized to bill previously-transferred Mountain House customers responsible for past ND charges for the period between March 31, 2002 (when Schedule E-DEPART temporarily expired) through January 31, 2005 (when Schedule E-DEPART was reinstated), amortized over a three-year period. The 2008 bill contained the final portion of such ND amortization charges (the first was billed from April 30, 2005 to December 31, 2005, the second – from January 31, 2006 to December 31, 2006, the third – from January 31, 2007 to December 31, 2007 and the final portion of the three-year amortization period was billed over the first three months of 2008, January 31, 2008 through March 31, 2008). The 2012 bill does not contain ND amortization charges. The ND charges from January 1, 2012, through December 31, 2012, are included in the total NBCs for 2012.

The Department of Water Resources' Bond and Power Charges, imposed by Decision 03-07-028, do not apply to the Mountain House customers due to the fact that these customers departed prior to February 1, 2001.

Since January 2002, PG&E has been annually billing MOD for all NBCs for which it had tariff authorization to bill. To date, PG&E has sent MOD twelve annual

³ Nuclear Decommissioning costs were approved in the 1996 General Rate Case at \$36 million per year, and then reduced by Advice 1614-E to \$33 million per year after a ruling by the Internal Revenue Service.

NBC bills (for 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011 and 2012) covering the obligations of the remaining departing customers.

The first NBC bill (for 2001) was calculated by: (1) aggregating the usage “snapshots” of all customers on each rate schedule; (2) applying then-current schedule-specific NBC rates to the usage totals by schedule; and (3) summing the resulting NBC bills across schedules to obtain a total bill. Since then, however, each of the remaining departed customers was individually set up for departing load billing in PG&E’s Customer Information System (CIS).⁴ PG&E’s CIS calculates each departed customer’s NBC bill based on monthly usage from the customer’s 12-month historic “snapshot” and the then-current NBC rates applicable to the customer’s rate schedule or otherwise approved by the Commission for municipal departing load. The monthly NBC charges for each customer plus interest at the three-month commercial paper rate are then summed across all customers to create one annual bill to send to MOD covering the preceding year.

⁴ Some of these 137 accounts have subsequently gone out of existence to make way for new developments. PG&E has adjusted the bill to account for the removal.

Attachment 2:
Preliminary 2012 Non-Bypassable Charge
Invoice for Mountain House Customers



99950007220310200002448060000244806

Invoice Number	Invoice Date	Amount Due	Amount Enclosed
0007220310-2	10/17/2012	\$ 2,448.06	

MODESTO IRRIGATION DISTRICT
 ATTN: ROBERT HONDEVILLE
 P.O. BOX 4060
 MODESTO CA 95352

PG&E
 Box 997300
 Sacramento, CA
 95899-7300

Please return this portion with your payment. Thank you.

When Making Inquiries or Address Changes,
 Please Contact:

Customer Number
 353102

Departing Load
 Mail Code B12C
 P.O. Box 770000
 SAN FRANCISCO CA 94177-0001
 (800) 743-5000

Invoice Number
 0007220310-2

Departing Load Nonbypassable Charges
 Service Address :
 P.O. BOX 4060
 MODESTO

Description	Quantity	Unit		Amount
		Factor	Rate	

Reference Number: WXV13712

NUCLEAR DECOMMISSIONING CHARGES - JAN 12	58838	Kwh		32.08
ONGOING CTC CHARGES - JAN 12	58838	Kwh		320.75
INTEREST CHARGE - JAN 12				0.57
NUCLEAR DECOMMISSIONING CHARGES - FEB 12	62731	Kwh		34.52
ONGOING CTC CHARGES - FEB 12	62731	Kwh		340.37
INTEREST CHARGE - FEB 12				0.55
NUCLEAR DECOMMISSIONING CHARGES - MAR 12	51587	Kwh		28.14
ONGOING CTC CHARGES - MAR 12	51587	Kwh		280.42
INTEREST CHARGE - MAR 12				0.41
NUCLEAR DECOMMISSIONING CHARGES - APR 12	46509	Kwh		25.67
ONGOING CTC CHARGES - APR 12	46509	Kwh		252.16

INTEREST CHARGE - APR 12



0.32



MODESTO IRRIGATION DISTRICT
ATTN: ROBERT MONDEVILLE
P.O. BOX 4060
MODESTO CA 95352

PG&E
Box 997300
Sacramento, CA
95899-7300

When Making Inquiries or Address Changes,
Please Contact:

Departing Load
Mail Code B12C
P.O. Box 770000
SAN FRANCISCO CA 94177-0001
(800) 743-5000

Customer Number
353102

Invoice Number
0007220310-2

Description	Quantity	Unit	Factor	Rate	Amount
NUCLEAR DECOMMISSIONING CHARGES - MAY 12	56339	Kwh			30.95
ONGOING CTC CHARGES - MAY 12	56339	Kwh			302.80
INTEREST CHARGE - MAY 12					0.33
NUCLEAR DECOMMISSIONING CHARGES - JUN 12	69659	Kwh			38.42
ONGOING CTC CHARGES - JUN 12	69659	Kwh			381.03
INTEREST CHARGE - JUN 12					0.35
NUCLEAR DECOMMISSIONING CHARGES - JUL 12	60025	Kwh			32.96
ONGOING CTC CHARGES - JUL 12	60025	Kwh			69.16
INTEREST CHARGE - JUL 12					0.07
NUCLEAR DECOMMISSIONING CHARGES - AUG 12	66652	Kwh			36.63
ONGOING CTC CHARGES - AUG 12	66652	Kwh			76.83
INTEREST CHARGE - AUG 12					0.05
NUCLEAR DECOMMISSIONING CHARGES - SEP 12	64026	Kwh			35.36
ONGOING CTC CHARGES - SEP 12	64026	Kwh			5.47
INTEREST CHARGE - SEP 12					0.01



MODESTO IRRIGATION DISTRICT
ATTN: ROBERT HONDEVILLE
P.O. BOX 4060
MODESTO CA 95352

PG&E
Box 997300
Sacramento, CA
95899-7300

When Making Inquiries or Address Changes,
Please Contact:

Customer Number: 353102

Departing Load
Mail Code B12C
P.O. Box 770000
SAN FRANCISCO CA 94177-0001
(800) 743-5000

Invoice Number: 0007220310-2

Table with 5 columns: Description, Quantity, Unit, Rate, Amount. Rows include NUCLEAR DECOMMISSIONING CHARGES, ONGOING CTC CHARGES, and INTEREST CHARGE for Oct, Nov, and Dec 12. Summary rows show Line Item SubTotal and AMOUNT NOW DUE.

Note: This invoice reflects current charges only.
Any past due amounts will be billed separately.

ELECTRIC INDUSTRY DEFINITIONS

- a. **Trust Transfer Amount (TTA):** The charge repays principal and interest on the bonds used to refinance a portion of costs related to investments in electric generation facilities and purchased power contracts, in order to provide a 10% bill reduction to residential and small commercial customers in the years 1998 to 2002. The TTA does not belong to PG&E. The TTA has been transferred to a separate company. PG&E is collecting the TTA on behalf of this company.
- b. **Nuclear Decommissioning:** The non-by passable charge that collects the funds required for site restoration when PG&E's nuclear power plants are removed from service.
- c. **Public Purpose Programs:** The non-by passable charge that funds state-mandated assistance programs for low-income customers and energy-efficiency programs.
- d. **DWR Bond Charge:** The charge that recovers the cost of bonds issued to finance a portion of the historic cost of power purchased by California Department of Water Resources (DWR) to serve electric customers. DWR bond revenues are collected on behalf of DWR and do not belong to PG&E.
- e. **Energy Cost Recovery Amount:** These charges are approved by the CPUC and authorized by California Public Utilities Code Section 848 et seq. The purpose of these charges is to pay the principal, interest, and other costs associated with Energy Recovery Bonds (Bonds) that were issued by a Special Purpose Entity (SPE). One of these charges is the Dedicated Rate Component (DRC), which is \$0.00479 kWh. The right to receive DRC revenues has been transferred to the SPE and does not belong to PG&E. This right is called Recovery Property. PG&E collects the DRC on behalf of the SPE, which uses these funds to pay Bond principal, interest, and other Bond-related costs. The SPE transferred the net Bond proceeds to PG&E to purchase Recovery Property from PG&E. PG&E used the proceeds from the sale of Recovery Property to refinance its bankruptcy Regulatory Asset, which was established by the Commission to help finance PG&E's emergence from bankruptcy.
- f. **Competition Transition Charges (CTC):** The cost of purchased power agreements, signed prior to December 20, 1995, in excess of a CPUC approved proxy of the market price of electricity as well as a portion of electric industry restructuring implementation costs as authorized by the CPUC.
- g. **Power Charge Indifference Adjustment (PCIA):** The portion of your bill (either a charge or credit) intended to ensure that customers that purchase electricity from non-utility suppliers pay their share of the costs of generation acquired prior to 2003.

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

1st Light Energy	Department of General Services	North America Power Partners
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
BART	Duke Energy	PG&E
Barkovich & Yap, Inc.	Economic Sciences Corporation	Praxair
Bartle Wells Associates	Ellison Schneider & Harris LLP	R. W. Beck & Associates
Bloomberg	Foster Farms	RCS, Inc.
Bloomberg New Energy Finance	G. A. Krause & Assoc.	SCD Energy Solutions
Boston Properties	GLJ Publications	SCE
Braun Blaising McLaughlin, P.C.	GenOn Energy Inc.	SMUD
Brookfield Renewable Power	GenOn Energy, Inc.	SPURR
CA Bldg Industry Association	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Public Utilities Commission
CENERGY POWER	Green Power Institute	Seattle City Light
CLECA Law Office	Hanna & Morton	Sempra Utilities
California Cotton Ginners & Growers Assn	Hitachi	Sierra Pacific Power Company
California Energy Commission	In House Energy	Silicon Valley Power
California League of Food Processors	International Power Technology	Silo Energy LLC
California Public Utilities Commission	Intestate Gas Services, Inc.	Southern California Edison Company
Calpine	Lawrence Berkeley National Lab	Spark Energy, L.P.
Cardinal Cogen	Los Angeles County Office of Education	Sun Light & Power
Casner, Steve	Los Angeles Dept of Water & Power	Sunrun Inc.
Center for Biological Diversity	Luce, Forward, Hamilton & Scripps LLP	Sunshine Design
Chris, King	MAC Lighting Consulting	Sutherland, Asbill & Brennan
City of Palo Alto	MRW & Associates	Tecogen, Inc.
City of Palo Alto Utilities	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
City of San Jose	Marin Energy Authority	TransCanada
City of Santa Rosa	McKenzie & Associates	Turlock Irrigation District
Clean Energy Fuels	Merced Irrigation District	United Cogen
Clean Power	Modesto Irrigation District	Utility Cost Management
Coast Economic Consulting	Morgan Stanley	Utility Specialists
Commercial Energy	Morrison & Foerster	Verizon
Consumer Federation of California	Morrison & Foerster LLP	Wellhead Electric Company
Crossborder Energy	NLine Energy, Inc.	Western Manufactured Housing Communities Association (WMA)
Davis Wright Tremaine LLP	NRG West	eMeter Corporation
Day Carter Murphy	NaturEner	
Defense Energy Support Center	Norris & Wong Associates	