



**Pacific Gas and  
Electric Company®**

**Brian K. Cherry**  
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Regulatory Relations

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P.O. Box 770000  
San Francisco, CA 94177

May 13, 2005

**Advice 2632-G/2664-E**  
**(Pacific Gas and Electric Company ID U 39 M)**

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Public Utilities Commission of the State of California

**Subject: Proposal of Pacific Gas and Electric Company to Establish  
New Memorandum Accounts to Record Advanced Metering  
Infrastructure Costs**

**Purpose**

Pacific Gas and Electric Company (PG&E) hereby requests California Public Utilities Commission (CPUC or the Commission) approval to establish two new Advanced Metering Infrastructure Memorandum Accounts (AMIMA-E for electric and AMIMA-G for gas) to record costs incurred for the Advanced Metering Infrastructure (AMI) Project prior to Commission approval of PG&E's requests for rate recovery in Application (A.)05-03-016 and its upcoming AMI Project Application. Upon approval of these accounts, PG&E will record all costs incurred for the AMI Project for future review and disposition by the Commission in these accounts, and such AMI costs will no longer be recorded in the Advanced Metering and Demand Response Account (AMDRA).<sup>1</sup>

**Background**

In its Order Instituting Rulemaking (R.)02-06-001, the CPUC began a process of assessing ways to implement programs and tools that would enable utilities to offer demand response options to customers in order to reduce energy consumption on peak days. The CPUC, in conjunction with the California Energy Commission, set targets to meet specific demand response goals by the summer of 2007. Although PG&E has numerous programs targeted to large customers, the ability to move toward achieving those 2007 goals requires

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<sup>1</sup> Costs previously recorded in AMDRA, prior to approval of these accounts, will be subject to review and disposition by the Commission in accordance with the AMDRA tariff and related Commission decisions and resolutions. Advice Letter 2633-E-A, dated February 25, 2005, is currently pending before the Commission regarding costs booked into AMDRA, and PG&E will seek separate recovery of amounts booked into AMDRA in accordance with AL 2633-E-A prior to the effectiveness of accounts proposed in this Advice Letter.

participation by the residential and small commercial sectors. PG&E's AMI Project is a key component of that plan.

PG&E filed its initial preliminary AMI Project Business Case in October of 2004 and PG&E updated its business case filing on March 15, 2005. Simultaneous with the AMI business case filing in March, PG&E also filed A.05-03-016 seeking rate recovery for certain AMI Project pre-deployment costs. PG&E continues to seek expeditious approval of A.05-03-016.

Nevertheless, PG&E believes that it is imperative that certain critical path AMI activities must commence and continue beginning as early as July 1, 2005, pending Commission review of A.05-03-016 and PG&E's AMI Project Application. Therefore, PG&E is now requesting expedited approval to record costs associated with the AMI Project in the proposed memorandum accounts, AMIMA-E and AMIMA-G, in order to preserve the ability to obtain future rate recovery of these costs in A.05-03-016 and the AMI Project Application, as listed in the attached Preliminary Statements proposed herein.<sup>2</sup> PG&E is also identifying possible categories of costs which will be recorded to these memorandum accounts so all AMI-related costs incurred prior to Commission decisions on A.05-03-016 and the AMI Project Application are tracked and subject to verification, on a month-to-month basis, in one place.

PG&E is making this filing in order to prevent any delay in the progress of the AMI Project, and in order to meet the Commission's demand response goals. Full meter deployment is projected to begin as early as the second quarter of 2006. As stated in A.05-03-016 and consistent with the procedural approach outlined in the "Assigned Commissioner's Ruling Laying Out Approach to the Case, Scheduling a Pre-hearing Conference and Other Procedural Matters" in San Diego Gas & Electric Company's similar AMI proceeding (A.05-03-015), approval of these memorandum accounts and PG&E's A.05-03-016 is needed in order to ensure that necessary pre-deployment advanced metering infrastructure activities may continue without delay and without precluding rate recovery at a future date, after Commission review.

### **Proposed Preliminary Statements**

PG&E is requesting Commission authority to establish the Advanced Metering Infrastructure Memorandum Accounts for electric (AMIMA-E) and gas (AMIMA-G) to record all expenses incurred as a result of AMI Project activities prior to Commission approval of PG&E's full AMI Project Application. The proposed Preliminary Statements are attached.

PG&E has already requested recovery of \$49 million in pre-deployment expenditures for the period July 1 to December 31, 2005 through the cost recovery mechanism proposed in A.05-03-016. If the Commission approves

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<sup>2</sup> As previously stated in connection with its March 15 AMI Business Case filing, PG&E presently intends to file its AMI Project Application sometime in early summer of 2005.

A.05-03-016, PG&E will transfer the AMIMA-E and AMIMA-G balances, up to the expenditure level and for the periods approved in that Application, to the cost recovery mechanism approved in that Application. PG&E will request to recover any remaining balances in AMIMA-E and AMIMA-G through the cost recovery mechanism to be proposed in PG&E's upcoming AMI Project Application.

### **Previous Request in the AMI Pre-Deployment Application 05-03-016**

This request does not supersede the cost recovery mechanism proposed in PG&E's AMI Pre-deployment Application (A.05-03-016) filed on March 15, 2005. This request is for authority to record all AMI Project-related costs in these memorandum accounts until PG&E's proposals in A.05-03-016 and the upcoming AMI Project Application are acted upon.

### **Request for Commission Approval**

PG&E requests the Commission approve this Advice Letter, effective as of the filing date, on or before **May 13**, specifically finding that:

1. PG&E is authorized to establish new memorandum accounts, AMIMA-E and AMIMA-G, to record AMI costs incurred for the AMI Project in those accounts beginning as of the date of this filing, subject to future disposition by the Commission.
2. PG&E is authorized to seek recovery of the balances in the AMIMA-E and AMIMA-G through future AMI ratemaking mechanisms.

### **Protests**

Due to the immediate need to ensure that necessary pre-deployment advanced metering infrastructure activities may continue without delay and without precluding rate recovery at a future date, after Commission review, PG&E respectfully requests expedited treatment of this advice filing and a limitation of the protest period such that the notice period for this filing be shortened from twenty days to ten (10) calendar days after the date of this filing, pursuant to General Order 96-A, Section IV-B, Effective Date and Section XV-Exceptions. PG&E requests that anyone wishing to protest this filing do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than 10 days after the date of this filing, which is **May 23, 2005**. Protests should be mailed to:

IMC Branch Chief – Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102  
Facsimile: (415) 703-2200  
E-mail: [jjr@cpuc.ca.gov](mailto:jjr@cpuc.ca.gov) and [jnj@cpuc.ca.gov](mailto:jnj@cpuc.ca.gov)

May 13, 2005

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:

Pacific Gas and Electric Company  
Attention: Brian K. Cherry  
Director, Regulatory Relations  
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 accordance with General Order 96-A, Section V.B., PG&E respectfully requests that this advice filing become effective as of the filing date, on May 13, 2005. This is needed in order to ensure that necessary pre-deployment advanced metering infrastructure activities may continue without delay and without precluding rate recovery at a future date, after Commission review.

### **Notice**

In accordance with General Order 96-A, Section III, Paragraph G, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.02-06-001. Address changes should be directed to Rose De La Torre at (415) 973-4716. Advice letter filings can also be accessed electronically at:

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

  
Director - Regulatory Relations

### Attachments

cc: Service List R.02-06-001

# 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)**

Utility type:

ELC       GAS  
 PLC       HEAT     WATER

Contact Person: Bernard Lam

Phone #: (415) 973-4878

E-mail: bxlc@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) #: 2632-G/2664-E

Subject of AL: Proposal of Pacific Gas and Electric Company to Establish New Memorandum Accounts to Record Advanced Metering Infrastructure Costs

Keywords (choose from CPUC listing): Memorandum Account, Metering

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

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

N/A

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: Not applicable

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: \_\_\_\_\_

Resolution Required?  Yes  No

Requested effective date: 05/13/2005

No. of tariff sheets: 8

Estimated system annual revenue effect (%): \_\_\_\_\_

Estimated system average rate effect (%): \_\_\_\_\_

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: Preliminary Statements, Table of Contents

Service affected and changes proposed<sup>1</sup>: \_\_\_\_\_

Pending advice letters that revise the same tariff sheets: \_\_\_\_\_

**Protests 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  
Attention: Tariff Unit  
505 Van Ness Ave.,  
San Francisco, CA 94102  
jjr@cpuc.ca.gov and jnj@cpuc.ca.gov

Pacific Gas and Electric Company  
Attn: Brian K. Cherry  
Director, Regulatory Relations  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177  
E-mail: PGETariffs@pge.com

<sup>1</sup> Discuss in AL if more space is needed.

**ATTACHMENT I  
ADVICE 2632-G**

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
23152-G	Preliminary Statements -- Part BK -- Advanced Metering Infrastructure Memorandum Account-Gas	NEW
23153-G	Preliminary Statements -- Part BK -- Advanced Metering Infrastructure Memorandum Account-Gas	NEW
23154-G	Table of Contents -- Preliminary Statements --	21966-G
23155-G	Table of Contents -- Rate Schedules --	23135-G

**ATTACHMENT I  
ADVICE 2664-E**

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
23441-E	Preliminary Statements -- Part DY -- Advanced Metering Infrastructure Memorandum Account-Electric	NEW
23442-E	Preliminary Statements -- Part DY -- Advanced Metering Infrastructure Memorandum Account-Electric	NEW
23443-E	Table of Contents -- Preliminary Statements --	23419-E
23444-E	Table of Contents -- Rate Schedules --	23420-E



PRELIMINARY STATEMENT

BK. ADVANCED METERING INFRASTRUCTURE MEMORANDUM ACCOUNT-GAS (AMIMA-G)

(N)

1. **PURPOSE:** The purpose of the Advanced Metering Infrastructure Memorandum Account-Gas (AMIMA-G) is to record and recover the incremental Operations and Maintenance (O&M) and Administrative and General (A&G) expenditures and capital-related costs incurred for an Advanced Metering Infrastructure (AMI) Project.
2. **APPLICABILITY:** The AMIMA-G applies to all customer classes, except for those specifically excluded by the Commission.
3. **RATES:** The current AMIMA-G does not have a rate component.
4. **ACCOUNTING PROCEDURE:** PG&E shall maintain the AMIMA-G by making entries to this account at the end of each month as follows:
  - a. A debit entry equal to PG&E's incremental O&M and A&G expenses and capital-related costs incurred for the AMI Project. These capital, O&M and A&G costs may relate to numerous activities or organizations, including but not limited to the following areas:
    - AMI project management, including contract management and development, communications, budget and accounting management, human resource management, process redesign, and other related areas
    - Communication systems, including network controllers and telecommunications links
    - Customer outreach and customer care
    - Data collector hardware and software
    - Development of training materials and procedures
    - Evaluation and planning
    - Facilities
    - Gas and electric meters, transmitting modules, and related equipment
    - Logistics management tools and activities
    - Meter installation, including customer data exceptions processing
    - Network operations staff
    - Operations center hardware and systems
    - Site surveys and development
    - System design, programming, and other upgrades/enhancements for integrated systems including billing, records, customer information and other information systems using meter information
    - Technical support staff and operations
    - Testing of systems and processes
    - Training

(N)

(Continued)



PRELIMINARY STATEMENT  
(Continued)

BK. ADVANCED METERING INFRASTRUCTURE MEMORANDUM ACCOUNT-GAS (AMIMA-G)  
(Cont'd.)

(N)

4. ACCOUNTING PROCEDURE: (Cont'd.)

b. A debit entry equal to the interest on the average of the balance at the beginning of the month and the balance after the above entry at a rate equal to one-twelfth the interest rate on three-month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

5. DISPOSITION: Upon Commission approval of a cost recovery mechanism in the AMI Pre-deployment Application (A.05-03-016) or another proceeding determined by the Commission, such as PG&E's AMI Project Application, PG&E will transfer the costs, not to exceed the approved expenditure level, from the AMIMA-G to the GAMA to be recovered via the mechanism as set forth in A.05-03-016 or such other account as may be approved by the Commission at that time.

(N)



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Part AP	Not Being Used	
Part AQ	Pipeline Expansion Balancing Account.....	16519 to 16521-G
Part AR	Demand-Side Management Tax Change Memorandum Account.....	16502-G
Part AS	Not Being Used	
Part AT	Not Being Used	
Part AU	Allocation of Residual Costs Memorandum Account .....	19933,19934-G
Part AV	Capital Audit Consultant Cost Memorandum Account .....	20432-G
Part AW	Self-Generation Program Memorandum Account .....	20984-G
Part AX	Food Service Technology Center Memorandum Account .....	20987-G
Part AY	Baseline Balancing Account .....	21051-G
Part AZ	El Paso Turned-Back Capacity Balancing Account .....	21378 to 21380-G
Part BC	Financial Hedging Memorandum Account .....	21818-G
Part BE	El Paso Settlement Memorandum Account .....	21965-G
Part BK	Advanced Metering Infrastructure Memorandum Account-Gas .....	23152,23153-G (N)

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Advice Letter No. 2632-G  
Decision No.

Issued by  
**Karen A. Tomcala**  
Vice President  
Regulatory Relations

Date Filed May 13, 2005  
Effective \_\_\_\_\_  
Resolution No. \_\_\_\_\_



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GS	Multifamily Service .....	23121,23021,18601-G
GT	Mobilehome Park Service .....	23122,23023-G
G-10	Service to Company Employees .....	11318-G
GL-1	Residential CARE Program Service .....	23123,23025-G
GML	Master-Metered Multifamily CARE Program Service .....	23124,22858,23027-G
GSL	Multifamily CARE Program Service .....	23125,23126,23030-G
GTL	Mobilehome Park CARE Program Service .....	23127,23128,23033-G
G-MHPS	Master-Metered Mobilehome Park Safety Surcharge .....	22034-G

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G-NR2	Gas Service to Large Commercial Customers .....	23130,23037-G
G-CP	Gas Procurement Service to Core End-Use Customers .....	23131-G
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G-NT	Gas Transportation Service to Noncore End-Use Customers .....	22892,22601,22037,22038-G
G-EG	Gas Transportation Service to Electric Generation .....	22894,22895,22525,22173-G
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PRELIMINARY STATEMENT

DY. ADVANCED METERING INFRASTRUCTURE MEMORANDUM ACCOUNT-ELECTRIC (AMIMA-E)

(N)

1. **PURPOSE:** The purpose of the Advanced Metering Infrastructure Memorandum Account-Electric (AMIMA-E) is to record and recover the incremental Operations and Maintenance (O&M) and Administrative and General (A&G) expenditures and capital-related costs incurred for an Advanced Metering Infrastructure (AMI) Project.
2. **APPLICABILITY:** The AMIMA-E applies to all customer classes, except for those specifically excluded by the Commission.
3. **RATES:** The current AMIMA-E does not have a rate component.
4. **ACCOUNTING PROCEDURE:** PG&E shall maintain the AMIMA-E by making entries to this account at the end of each month as follows:
  - a. A debit entry equal to PG&E's incremental O&M and A&G expenses and capital-related costs incurred for the AMI Project. These capital, O&M and A&G costs may relate to numerous activities or organizations, including but not limited to the following areas:
    - AMI project management, including contract management and development, communications, budget and accounting management, human resource management, process redesign, and other related areas
    - Communication systems, including network controllers and telecommunications links
    - Customer outreach and customer care
    - Data collector hardware and software
    - Development of training materials and procedures
    - Evaluation and planning
    - Facilities
    - Gas and electric meters, transmitting modules, and related equipment
    - Logistics management tools and activities
    - Meter installation, including customer data exceptions processing
    - Network operations staff
    - Operations center hardware and systems
    - Site surveys and development
    - System design, programming, and other upgrades/enhancements for integrated systems including billing, records, customer information and other information systems using meter information
    - Technical support staff and operations
    - Testing of systems and processes
    - Training

(N)

(Continued)



PRELIMINARY STATEMENT  
(Continued)

DY. ADVANCED METERING INFRASTRUCTURE MEMORANDUM ACCOUNT-ELECTRIC (AMIMA-E)  
(Cont'd.)

(N)

4. ACCOUNTING PROCEDURE: (Cont'd.)

b. A debit entry equal to the interest on the average of the balance at the beginning of the month and the balance after the above entry at a rate equal to one-twelfth the interest rate on three-month Commercial paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

5. DISPOSITION: Upon Commission approval of a cost recovery mechanism in the AMI Pre-deployment Application (A.05-03-016) or another proceeding determined by the Commission, such as PG&E's AMI Project Application, PG&E will transfer the costs, not to exceed the approved expenditure level, from the AMIMA-E to the AMDRA to be recovered via the mechanism as set forth in A.05-03-016 or such other account as may be approved by the Commission at that time.

(N)



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RATE SCHEDULES

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
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**PG&E Gas and Electric Advice  
Filing List  
General Order 96-A, Section III(G)**

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