

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

Tel. No. (415) 703-1691



December 15, 2006

Advice Letter 2753G|G-A

Ms Rose de la Torre
Pacific Gas and Electric Company
77 Beale Street, Room 1088
Mail Code B10C
San Francisco, CA 94105

Subject: Request for Expedited Implementation of PG&E's Natural Gas 2006-2007
Winter Gas Savings Program for Residential and Commercial Gas Customers:
"10/20 Plus" Program

Dear Ms de la Torre:

Advice Letter 2753G|G-A is effective October 5, 2006. A copy of the advice letter is sent herewith for your records.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean H. Gallagher".

Sean H. Gallagher
Director
Energy Division

REGULATORY RELATIONS	
M Brown	Tariffs Section
R Dela Torre	D Poster
B Lam	S Ramaiya
DEC 20 2006	
Return to _____	Records _____
cc to _____	File _____



Brian K. Cherry
Vice President
Regulatory Relations

77 Beale Street, Room 1087
San Francisco, CA 94105

Mailing Address
Mail Code B10C
Pacific Gas and Electric Company
P.O. Box 770000
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October 30, 2006

Advice 2753-G-A

(Pacific Gas and Electric Company ID U39G)

Subject: Supplement: Request for Expedited Implementation of PG&E's Natural Gas 2006-2007 Winter Gas Savings Program for Residential and Commercial Gas Customers: '10/20 Plus' Program

Public Utilities Commission of the State of California

In compliance with Resolution G-3392, Pacific Gas and Electric Company (PG&E) hereby submits for filing a supplement to Advice Letter (AL) 2753-G - Request for Expedited Implementation of PG&E's Natural Gas 2006-2007 Winter Gas Savings Program for Residential and Commercial Gas Customers: '10/20 Plus' Program.

Purpose

The purpose of this supplement is to modify AL 2753-G consistent with Ordering Paragraph 2 of Resolution G-3392 as directed by the California Public Utilities Commission (Commission) on October 5, 2006.

In addition to the modification ordered in Resolution E-3392, PG&E will revise its Winter Gas Savings Program (WGSP) Subaccounts in the Purchased Gas Account (PGA) and Core Fixed Cost Account (CFCA) tariffs to record the rebates directly to the WGSP subaccounts of the PGA and CFCA.

Background

In AL 2753-G, PG&E proposed to collect program rebates and costs from its residential and commercial customers over a 12-month period beginning in January 2007. The Division of Ratepayer Advocates (DRA) requested that PG&E recover these amounts from residential customers during the months of April through October 2007. DRA argued that this would benefit residential customers as their gas bills tend to be lower and thus more manageable during that timeframe as compared to winter months. Per Resolution E-3392, issued October 5, 2006, PG&E will recover '10/20 Plus' program rebates and costs from commercial and residential customers from April through October 2007.

Modified Agreement With DRA

Subsequent to the issuance of G-3392, PG&E discovered internal recovery and billing concerns that did not present themselves prior to the original negotiations with DRA. PG&E, however, negotiated in good faith with DRA and on October 25, 2006, requested DRA permission to slightly modify the terms of the original agreement.

On October 25, 2006, PG&E sent a letter to DRA proposing to recover 10/20 Program costs from residential customers from April through October 2007 exclusively through the procurement rate component, instead of through both transportation and procurement. On October 25, 2006, DRA sent an email accepting PG&E's proposal. This method of recovery will address concerns related to PG&E's billing system while complying with the spirit of the original agreement.

Rate Impact of Modified Agreement With DRA

The rate impact of PG&E's revised agreement with DRA is diminutive – 3 thousandths of one cent (i.e., an increase of 3 in the 5th decimal place) for residential customers (please see Attachment 1). On average, a residential customer would have to use about 170 therms or more during a monthly billing cycle in order for this revision to impact the bill by one cent. Since the Gas 10/20 Plus rate recovery for residential customers will occur from April through October 2007 when very few residential customers use 170 therms or more, very few customers will have a 1 cent or more bill impact.

The reason why PG&E's revision has a rate impact is that the rate recovery occurs though procurement only during summer 2007 rather than all residential class volumes. This means that the rate component for Gas 10/20 Plus recovery will only include procurement volumes and not include core transport volumes, which comprise 0.3% of residential volumes. The result is that the residential bundled rate will be 3 thousandths of one cent higher than it would have been by the original agreement.

As before this revision, PG&E's 2008 Annual Gas True-Up (AGT) will include a true-up of the 2007 10/20 Plus Program recorded procurement and transportation-related rebates by class. Therefore, the diminutive impact through this revision for a very small number of bundled residential customers with their 2007 summer season bills is a temporary effect only.

An illustrative table showing the rate difference between the original agreement with DRA and the modified agreement accepted by DRA on October 25, 2006 is included in Attachment 1 of this filing.

Tariff Changes

PG&E is implementing billing system changes that will enable PG&E to record the procurement and transportation portion of the WGSP rebates directly to the WGSP subaccounts of the PGA and CFCA, respectively, and eliminates the need for the manual transfer. The revisions to the WGSP subaccounts of the PGA and the CFCA will allow PG&E to implement this billing system change and record the rebates directly to the WGSP subaccounts. This does not affect the cost of the program or the customer classes paying for it.

The affected tariff sheets are included in Attachment 2 of this filing.

Protest Period

Anyone wishing to protest this filing may do so by sending a letter by **November 19, 2006**, 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 should be submitted expeditiously. Protests should be mailed to:

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

Facsimile: (415) 703-2200
E-mail: jjn@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

Effective Date

PG&E requests that this advice filing be approved by **October 5, 2006**, subject to Energy Division approval.

Notice

In accordance with General Order 96-A, Section III, Paragraph G, a copy of this advice letter is being sent electronically or via U.S. mail to parties shown on the attached list, and to the service lists for R.04-01-006 (Energy Efficiency), Resolution G-3384 (last year's 10/20 Program), and A.04-07-044 (Biennial Cost Allocation Proceeding). 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>

A handwritten signature in black ink that reads "Brian K. Cheyette". The signature is written in a cursive style and is positioned above the title "Vice President - Regulatory Relations".

Vice President - Regulatory Relations

Attachments

cc: Service Lists – R.04-01-006, Resolution G-3384, and A.04-07-044

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 U39M

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Megan Hughes

Phone #: (415) 973-1877

E-mail: MEHr@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) #: 2753-G-A

Subject of AL: Supplement: Request for Expedited Implementation of PG&E's Natural Gas 2006-2007 Winter Gas Savings Program for Residential and Commercial Gas Customers: '10/20 Plus' Program

Keywords (choose from CPUC listing): Rebates, Program, Core

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

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL

Summarize differences between the AL and the prior withdrawn or rejected AL¹:

Resolution Required? Yes No

Requested effective date: 10-5-2006

No. of tariff sheets: 5

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: Gas Preliminary Statements C and D

Service affected and changes proposed¹: See Advice Letter

Pending advice letters that revise the same tariff sheets: N/A

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
inj@cpuc.ca.gov

Utility Info (including e-mail)
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

¹ Discuss in AL if more space is needed.

Attachment 1

IMPACT ON RESIDENTIAL RATES FROM IMPLEMENTING 10/20 PLUS IN RATES APRIL 1, 2007 - OCTOBER 31, 2007

(Note: Only Applies to Residential Class; Commercial Rates Change for 10/20 Plus On January 1, 2007 for annual recovery)

ORIGINAL AGREEMENT WITH DIVISION OF RATEPAYER ADVOCATES FOR SEASONAL RECOVERY FROM RESIDENTIAL CUSTOMERS

Residential Share of 10/20 Plus (Equal Cents Per Therm Initial Recovery)	<u>Total</u>	<u>Procurement</u>	<u>Transportation</u>
1 10/20 Plus Program Cost	\$66,308	\$47,291	\$19,017
2 Residential Share of Annual Adopted Volumes (2005 BCAP Decision)	71.6%	72.0%	70.7%
3 Residential Share of 10/20 Program Cost for initial ratesetting purposes	\$47,503	\$34,056	\$13,446
		<u>Adopted Apr-Oct Avg. Yr.</u>	
4 Residential Bundled Volumes			809,414
5 Residential Transport Volumes			2,436
6 Less G-10 Transportation Adj.			1,210
7 Adjusted Residential Transportation Volumes			810,640
8 10/20 Plus Non-CARE Residential Program Cost for Rate Recovery - Procurement	\$34,056		\$0.04208
9 10/20 Plus Non-CARE Program Cost for Rate Recovery - Transportation	\$13,446		\$0.01659
10 Non-CARE Residential Rate for Bundled Customers	\$47,503		\$0.05866
11 Rate for CARE Residential - Procurement			\$0.04208
12 Rate for CARE Residential - Transportation			\$0.00485
13 Rate for CARE Residential - Totals for Bundled Customers			\$0.04693

<u>Recovery in April through October 2007</u>	<u>Present Rates</u>	<u>Rates w/10/20 Plus</u>	<u>Change</u>
14 Non-CARE Residential Bundled Rate	\$1.911	\$1.969	3.1%
15 CARE Residential Bundled Rate	\$1.503	\$1.550	3.1%
16 Non-CARE Residential Transportation+PPP Only Rates	\$0.457	\$0.474	3.6%
17 CARE Residential Transportation+PPP Only Rates	\$0.085	\$0.090	5.7%

REVISED AGREEMENT WITH DIVISION OF RATEPAYER ADVOCATES FOR SEASONAL RECOVERY FROM RESIDENTIAL CUSTOMERS

18 Include entire effect of Residential 10/20 Plus recovery in 2007 summer season procurement rates subject to true-up in 2008 AGT both by class and between procurement and transportation	\$47,503
19 Adopted Residential Bundled Volumes	809,414
20 Non-CARE Residential Customers for 2007 10/20 Plus Program (effective April 1, 2007 - Oct. 31, 2007)	\$0.05869
21 CARE Residential Customers for 2007 10/20 Plus Program (effective April 1, 2007 - Oct. 31, 2007)	\$0.04695

<u>Recovery in April through October 2007</u>	<u>Present Rates</u>	<u>2007 Rates w/10/20 Plus</u>	<u>Change</u>
14 Non-CARE Residential Bundled Rate	\$1.911	\$1.969	3.1%
15 CARE Residential Bundled Rate	\$1.503	\$1.550	3.1%
16 Non-CARE Residential Transportation+PPP Only Rates*	\$0.457	\$0.457	0.0%
17 CARE Residential Transportation+PPP Only Rates*	\$0.085	\$0.085	0.0%

* Note: As of August 2007, approximately 0.16% of PG&E's residential customers were transport only. These customers would pay for 10/20 Plus via the 2008 AGT with rates effective April 1, 2008 - October 31, 2008

**ATTACHMENT 2
Advice 2753-G-A**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
24438-G	Preliminary Statement Part D--Purchased Gas Account	24143-G
24439-G	Preliminary Statement Part F--Core Fixed Cost Account	24145-G
24440-G	Preliminary Statement Part F (Cont.)	24146-G
24441-G	Table of Contents -- Preliminary Statements	24436-G
24442-G	Table of Contents -- Rate Schedules	24437-G



PRELIMINARY STATEMENT
(Continued)

D. PURCHASED GAS ACCOUNT (PGA) (Cont'd.)

6. ACCOUNTING PROCEDURE: (Cont'd.)

d. Winter Gas Savings Program Procurement Subaccount

The following entries will be made to this subaccount each month or when applicable:

- 1) a debit entry, as appropriate, to record the procurement portion of the 2006 WGSP rebates recorded in the Distribution Cost Subaccount of the Core Fixed Cost Account; (T)
- 2) a debit entry to record the procurement portion of the WGSP rebates beginning in 2007; (T)
- 3) a debit entry, as appropriate, to record the procurement portion of the authorized WGSP marketing and implementation costs to this subaccount;
- 4) a credit entry equal to the revenue from the WGSP – Procurement rate component, excluding the allowance for F&U; and
- 5) an entry equal to the interest on the average of the balance in the subaccount at the beginning of the month and the balance in the subaccount after the above entries, 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.



PRELIMINARY STATEMENT
(Continued)

F. CORE FIXED COST ACCOUNT (CFCA) (Cont'd.)

6. ACCOUNTING PROCEDURE: (Cont'd.)

a. Distribution Cost Subaccount

The following entries will be made to this subaccount at the end of each month:

- 1) a credit entry equal to California Alternate Rates for Energy (CARE) shortfall resulting from core commercial deliveries under Schedule G-CARE, and customer charges under Schedule GL1-NGV, excluding the allowance for Franchise Fees and Uncollectible Accounts Expense (F&U);
- 2) a debit entry equal to one-twelfth of the core portion of the authorized GRC distribution base revenue amount (with credits and adjustments), excluding the allowance for (F&U);
- 3) a credit entry equal to the revenue from the CFCA – Distribution Cost rate component, excluding the allowance for F&U;
- 4) a credit entry, as appropriate, to record the rebates paid to customers associated with the 2006 Winter Gas Savings Program, which has corresponding entries in the Winter Gas Savings Program Transportation Subaccount of the CFCA and Winter Gas Savings Program Procurement Subaccount of the Purchased Gas Account; (T)
- 5) a debit or credit entry, as appropriate, to record the transfer of amounts from other accounts to this subaccount for recovery in rates, upon approval by the CPUC;
- 6) a debit or credit entry equal to any expense adopted by the CPUC as a cost to be recovered in this subaccount; and
- 7) an entry equal to interest on the average of the balance in the account at the beginning of the month and the balance in the account after above entries, at a rate equal to one-twelfth the interest rate of the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

b. Core Cost Subaccount

The following entries will be made to this subaccount at the end of each month:

- 1) a credit entry equal to the revenue from the CFCA – Core Cost rate component, excluding the allowance for F&U;
- 2) a credit entry equal to the revenue from the local transmission rate component from core deliveries during the month, excluding the allowance for F&U;
- 3) a debit entry equal to the core portion of intervenor compensation payments authorized by the CPUC, recorded during the month;

(Continued)



PRELIMINARY STATEMENT
(Continued)

F. CORE FIXED COST ACCOUNT (CFCA) (Cont'd.)

6. ACCOUNTING PROCEDURE: (Cont'd.)

b. Core Cost Subaccount (Cont'd.)

- 4) a debit entry equal to one-twelfth of the core portion of the authorized local transmission revenue requirement, excluding the allowance for F&U;
- 5) A debit or credit entry, as appropriate, to record the transfer of amounts from other accounts to this subaccount for recovery in rates, upon approval by the CPUC;
- 6) an entry equal to 70.03 percent of the local transmission revenue shortfall or over-recovery resulting from a change in customers qualifying for backbone-level end-use service, and associated throughput reduction or increase, as applicable;
- 7) a debit or credit entry equal to any amounts authorized by the CPUC to be recorded in this subaccount;
- 8) A debit entry equal to one-twelfth of the core portion of the current year Self Generation Incentive Program (SGIP) revenue requirement authorized by the CPUC; and
- 9) an entry equal to interest on the average of the balance in the account at the beginning of the month and the balance in the account after entries F.6.b.1 through F.6.b.8, above, at a rate equal to one-twelfth the interest rate of the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

c. Winter Gas Savings Program Transportation Subaccount

The following entries will be made to this subaccount each month or when applicable:

- 1) a debit entry, as appropriate, to record the transportation portion of the 2006 WGSP rebates recorded in the Distribution Cost Subaccount of the Core Fixed Cost Account; (T)
- 2) a debit entry to record the transportation portion of WGSP rebates beginning in 2007; (T)
- 3) a debit entry, as appropriate, to record the transportation portion of the authorized WGSP marketing and implementation costs to this subaccount;
- 4) a credit entry equal to the revenue from the WGSP – Transportation rate component, excluding the allowance for F&U; and
- 5) an entry equal to interest on the average of the balance in the account at the beginning of the month and the balance in the account after the above entries, at a rate equal to one-twelfth the interest rate of the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.



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RESIDENTIAL

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**PG&E Gas and Electric Advice
Filing List
General Order 96-A, Section III(G)**

ABAG Power Pool
Accent Energy
Aglet Consumer Alliance
Agnews Developmental Center
Ahmed, Ali
Alcantar & Elsesser
Ancillary Services Coalition
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
Cellnet Data Systems
Chevron Texaco
Chevron USA Production Co.
City of Glendale
City of Healdsburg
City of Palo Alto
City of Redding
CLECA Law Office
Commerce Energy
Constellation New Energy
CPUC
Cross Border Inc
Crossborder Inc
CSC Energy Services
Davis, Wright, Tremaine LLP
Defense Fuel Support Center
Department of the Army
Department of Water & Power City
DGS Natural Gas Services
Douglass & Liddell
Downey, Brand, Seymour & Rohwer
Duke Energy
Duke Energy North America
Duncan, Virgil E.
Dutcher, John
Dynergy Inc.
Ellison Schneider
Energy Law Group LLP
Energy Management Services, LLC
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.
IUCG/Sunshine Design LLC
J. R. Wood, Inc
JTM, Inc
Luce, Forward, Hamilton & Scripps
Manatt, Phelps & Phillips
Marcus, David
Matthew V. Brady & Associates
Maynor, Donald H.
MBMC, Inc.
McKenzie & Assoc
McKenzie & Associates
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
OnGrid Solar
Palo Alto Muni Utilities
PG&E National Energy Group
Pinnacle CNG Company
PITCO
Plurimi, Inc.
PPL EnergyPlus, LLC
Praxair, Inc.
Price, Roy
Product Development Dept
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
Smurfit Stone Container Corp
Southern California Edison
SPURR
St. Paul Assoc
Stanford University
Sutherland, Asbill & Brennan
Tabors Caramanis & Associates
Tecogen, Inc
TFS Energy
Transcanada
Turlock Irrigation District
U S Borax, Inc
United Cogen Inc.
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Western Hub Properties, LLC
White & Case
WMA