

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 12, 2007

Advice Letter 2787-G/2941-E

Mr. Brian Cherry
Vice President, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
San Francisco, CA 94177

REGULATORY RELATIONS DEPARTMENT

MAR 14 2007

Subject: Modification of the Existing Energy Efficiency Residential New Construction Program to Align with the California Energy Commission's New Solar Homes Partnership

Dear Mr. Cherry:

Advice Letter 2787-G/2941-E is effective March 12, 2007. A copy of Energy Division's disposition of the advice letter is included herewith for your records.

Sincerely,

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

Sean H. Gallagher, Director
Energy Division

March 12, 2007

ENERGY DIVISION DISPOSITION OF PG&E'S AL 2787-G/2941-E

SUMMARY

In accordance with Rule 4.7 in Decision (D.) 05-01-032, dated January 13, 2005, Energy Division Staff (Staff) prepares this Disposition approving Advice Letter No. 2787-G/2941-E

PG&E submitted Advice Letter 2787-G2941-E on December 1, 2006 requesting revisions in the program design of the 2006-2008 Residential New Construction (RNC) Energy Efficiency (EE) Program. The revisions included the addition of a second higher tier of efficiency targets and incentives plus an alteration of the forecasted program impacts. The revisions were designed to align the structure of PG&E's RNC program with the California Energy Commission's (CEC) New Solar Homes Program (NSHP).

Staff suspended the Advice Letter on December 19, 2006 to allow for more time to clarify the incentive interaction between PG&E's revised program and the CEC's NSHP. The Division of Ratepayer Advocates (DRA) and The Utility Reform Network (TURN) filed a joint Protest on December 21, 2006 citing that ratepayers could be forced to pay twice to incent the same energy efficiency measures; once through PG&E and once through the CEC, both via the Public Goods Charge. The Protest also requested more accurate data for which to compare the programs with. PG&E filed a response to the Protest on December 29, 2006. Staff reviewed PG&E's response and found that it contained additional information sufficient to dismiss the Protest.

Staff requested data on three occasions to clarify the revised program impacts and visited with PG&E Program Managers at PG&E's main office for direct, in-person information gathering. The main issues within the data requests focused on the reduction in kW and kWh program goals and cost effectiveness and their effect on PG&E's portfolio cost effectiveness.

Based on the additional information Staff has received from PG&E we understand their primary purpose in revising the RNC program. It is clear that PG&E is unlikely to accomplish the goals initially set for the RNC program under its current design. The proposed program design is likely to reap greater program savings at the end of the cycle than the original program even though the goals for the proposed RNC program are less than those of the original program. Staff remains concerned by the need to reduce the RNC program's kWh and kW savings goals, however, Staff is confident that these adjustments alone will not jeopardize the achievement of the PG&E's entire portfolio goals.

BACKGROUND

Utilities hold flexibility to shift EE program funds within its EE portfolio to maximize energy savings.

In D 05-09-043, the Commission approved the utility's EE portfolios and provided rules regarding, among other things, the tools available to the IOUs to keep their portfolios as flexible and economically efficient as possible. In D.05-09-043, Ordering paragraph 18 and Table 8, the Commission set forth fund shifting rules which directs the utilities to file advice letters when approved statewide EE programs increase their incentive level by more than 50% on a cumulative basis over the three year program cycle. This is the basis for AL 2787-G/2941-E.

PG&E is disappointed with the performance of the RNC program in its current form. The original PG&E RNC program was a program which mitigated "lost opportunities" during new home construction and was expected to achieve considerable kW, kWh, and therm savings. It was approved in 2005 as part of the overall portfolio despite the program's lack of cost effectiveness. According to PG&E, the original program's cost effectiveness and savings forecasts were calculated on the E3 calculator using data and trends for housing starts gathered during one of California's home construction booms. Market activity in new home construction decreased during 2006 as evident by the 31% fewer building permits issued in 2006 than during 2005¹. Confronted by a downturn in the market, developers may have experienced a reduction in profit margins and became less likely to participate in PG&E's RNC program².

In 2006 as a part of SB1, the CEC was tasked to encourage solar installation in new home developments. The CEC administers the \$350 million NSHP program providing incentives to builders willing to meet one of two tiers of energy efficiency improvements over Title 24 Building Standards. Specifically, the incentive offers at least \$2.50-\$2.60/w, according to the type of building and the performance of the system. PG&E proposes to offer additional energy efficiency incentives in the proposed RNC program ranging from \$400 (coastal) and \$500 (inland) for Tier 1 (15% above Title 24), and \$2,000 for Tier 2 (35% above Title 24) for single-family homes³. Table 1 below compares the incentives of the original RNC program and the proposed modifications.

Table 1: Comparison of Modified Program Incentive: PG&E 06-08 Res. New Construction Program

	PG&E RNC Program Description 02/01/2006		PG&E Advice Letter 2787-G/2941-E 12/1/2006	
	Standard ENERGY STAR*		Tier I *	Tier II *
Incentive (single family)	• \$400-\$500 per unit	• \$400-\$500 per unit	• \$2,000	
Requirements	• Efficiency 15% > T. 24	• Efficiency 15% > T. 24	• Efficiency 35% > T. 24	
	• Include CEC required Energy Star Appliances	• Include CEC required Energy Star Appliances	• Include CEC required Energy Star Appliances	• Achieve 40% reduction in cooling load
				• Install PV on premises

*Additional incentives available from CEC New Solar Homes Program to reduce cost of PV.

¹ Construction Industry Research Board, January 2007. "New Housing Units in Building Permits Issued : California Metropolitan Areas – Table 1 Single Family"

² Opinions gathered during in person meeting with PG&E Program Manager's on January 24, 2007.

³ Multifamily homes would receive energy efficiency incentives worth \$150 (coastal) or \$200 (inland) for Tier 1; there are no Tier II incentives for these properties.

COMMENTS/RESPONSES

PG&E adequately responded to the Protest filed by TURN and DRA and to the data requests of the Energy Division.

TURN and DRA filed a Protest to this AL on December 21, 2006 following the suspension of the AL by Energy Division (ED) on December 19, 2006. The Protest focused on two main points.

The first addressed a statement made in the AL that, “As part of the draft NSHP Guidebook, the CEC has proposed to offer additional solar incentives to builders of residential new construction if they exceed Title 24 standards by 35 percent.” The Protest noted that if both the CEC’s NSHP and the RNC offered incentives to reach 35% above Title 24, ratepayers could pay twice to incent the same EE measures. However, this issue is moot because it was caused by a last minute policy change in the final incentive structure of the NSHP. In the final version of the NSHP Guidebook, the CEC had omitted that statement, and in fact did not include an additional higher incentive.

The second issue in the DRA/TURN Protest was regarding the quality of data and comparable information included in the AL for parties to use to quantify the differences between the original RNC and the proposed program revisions. Staff also noticed that the information included in the table on page 3 of the AL used to describe the new program proposals was lacking a column to describe key metrics of the original program. Instead, the AL only qualitatively described metrics such as the total budget as “unchanged,” and the cost effectiveness as “close to the existing program.” The bulk of Staff’s data requests regarding the processing of this AL had to do with the creation of an accurate comparison between the two programs. The following is the final chart that allows comparison of the two program’s key metrics.

Table 2: Comparison of Modified Program Costs: PG&E 2006-2008 Res. New Construction Program*

Program Details	One Tier Existing RNC Program	Two Tier RNC Program as Stated in Advice Letter 2787-G/2941-E
Budget (in millions)	\$20.0	\$20.0
Peak kW Savings	8,484	5,557
Annual MWh Savings	10,521	5,997
Annual Therm Savings	1,734,706	2,148,930
Total Resource Cost (TRC)	0.95	0.88
TRC Levelized \$/kWh	.1717	.1525
TRC Levelized \$/Therm	1.11	1.14
Program Administrator Cost (PAC)	1.77	1.40
PAC Levelized \$/kWh	0.0896	0.0965
PAC Levelized \$/Therm	0.63	0.72

*Both of the Program design inputs were calculated on the 3b4 version of the E3 calculator.

DISCUSSION

In addition to the points made by TURN and DRA in their Protest, a number of other issues came out of Staff's consideration of this AL. These are addressed in order of importance to Staff.

1. In Table 1 presented above, it is clear that the cost effectiveness as presented by the TRC and the PAC of the proposed program adjustments is greatly reduced. Staff asked PG&E why they would alter their program design to the detriment of its cost effectiveness. In a meeting between Staff and PG&E on January 24, 2007, PG&E identified multiple areas where current program cost effectiveness inputs were turning out differently than they were forecasted. As previously mentioned, the new home market in 2006 was simply not as robust as it was forecasted to be. This is evident in the 31% drop in the number of new single family home permits issued state-wide in 2006 over 2005⁴. Also influencing cost effectiveness was a change in the definition used by the E3 calculator for the peak period of demand between the program design period and the present. As a result, PG&E's RNC program had installed less than 1%, and secured commitments for about 10% of its 3 year program goals by December 2006.

The identification of these issues adequately answered for Staff why PG&E would like to change their program design, but the question remained why should Staff approve change that resulted in a reduction in program goals and program cost effectiveness? Although PG&E holds the ability to change program design mid-cycle, the commission requires approval from ED of such changes when incentives are increased more than 50%. Staff felt that PG&E was reasonably forthcoming with the unexpected barriers it was experiencing through the RNC program. Based on the data requested by Staff, it was clear that the Commission could expect dismal performance of the RNC program unless it was altered to confront the challenges it faced. In addition, the potential benefits of EE and solar in tandem is a frontier that Staff would like to see PG&E gain more experience in before the 2009-2011 program cycle. Thus, Staff chose to allow PG&E to exercise its ability to react to new information and retool its program so as to achieve as much energy savings as possible. Building upon the CEC's NSHP structure will allow for maximum coordination between the Commission's EE goals and the State's interest in solar homes.

2. Would the additional cost of a home built to 35% > Title 24 standards be larger or smaller than the reduced cost of a smaller photovoltaic system? The NSHP, which went into effect on January 1, 2007, provides developers with no additional *solar* incentive to reach for the higher tier of energy efficiency before installing solar. IOU EE programs offer a natural fit to fill this incentive gap. However, a question that emerged for Staff in its consideration of this AL was how the EE required by the two NSHP tiers appear to the economics of new home builders. Specifically, if a builder had already decided to build a solar home and

⁴ Construction Industry Research Board, January 2007. "New Housing Units in Building Permits Issued : California Metropolitan Areas – Table 1 Single Family"

participate in the NSHP, would the cost of each home be greater at Tier 1, or at Tier 2? Is an additional incentive necessary to meet Tier 2, or do the economics favor Tier 2 already?

Staff will revisit this question after the revised RNC program produces enough verifiable data to analyze and inform future program design. PG&E is thus notified that it should collect this data and be ready when Staff inquires through a data request on this topic. PG&E is the first of the IOUs in the state to revise their RNC program to align with the CEC's NSHP. It is expected that other IOU's will follow PG&E's lead in aligning with the NSHP.

STAFF CONCLUSIONS

In its review of Protests to AL 2787-G/2941-E, and PG&E's response to the Protest issues, Staff is in general satisfied with PG&E's responses. No further actions are necessary pertaining to these Protests before this AL goes into effect.

The issues identified by Staff in the Discussion section above were adequately addressed by PG&E through data requests and direct meetings. Through the information collected, it is clear that PG&E is unlikely to accomplish the goals initially set for the RNC program under its current design. The proposed program design is likely to reap greater program savings at the end of the cycle than the original program even though the goals for the proposed RNC program are less than those of the original program. For this reason, Staff submits their approval of AL 2787-G/2941-E.

However, Staff feels that there is need to further explore the issues identified in paragraph 4 and 5 of the Discussion section. Staff intends to investigate this through additional data requests as the new program design goes into effect and produces verifiable data.

The suspension of PG&E's AL 2787-G/2941-E is removed without prejudice. PG&E's filing of AL 2787-G/2941-E is approved effective March 12, 2007.



Brian K. Cherry
Vice President
Regulatory Relations

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December 1, 2006

Advice 2787-G/2941-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Modification of the Existing Energy Efficiency Residential New Construction Program to Align with the California Energy Commission's New Solar Homes Partnership

Purpose

The purpose of this advice filing is to revise the 2006-2008 Energy Efficiency Residential New Construction (RNC) program to conform with the California Energy Commission's (CEC's) New Solar Homes Partnership (NSHP)¹. In particular, PG&E proposes an additional, increased incentive within the RNC program to encourage builders to meet additional energy efficiency requirements when installing solar.

Background

Decision (D.) 05-09-043, issued in September 2005, approved the utilities' programs and budgets for 2006-2008. Ordering Paragraph 18 and Table 8, "Adopted Fund Shifting Rules," direct utilities to file advice letters when a new energy efficiency program is proposed or when the proposed incentive level change impacts a statewide program offering and is more than a 50 percent increase over the original incentive level on a cumulative basis over the three-year cycle (D.05-09-043, p.146-149). As described below, recent CEC and legislative developments impact California's residential new construction market and PG&E's RNC program requiring substantial changes to that program. In this advice letter, PG&E proposes to modify the RNC program by offering a new tier with a new

¹ The Guidebook, containing the additional solar incentive, for the CEC's NSHP is expected to be approved by the CEC on December 13, 2006. In the event that the proposal is modified in some way that is inconsistent with PG&E's proposal, PG&E will file a supplement to this advice letter to revise the program accordingly.

incentive level within the RNC program. The new tier would reflect additional energy efficiency requirements and a proposed incentive increase greater than 50 percent of the original RNC incentive, as discussed below.

The RNC program promotes the ENERGY STAR® New Homes performance method and the prescriptive/measure-based method. Currently, the RNC program offers incentives for homes that have energy efficiency measures that are 15 percent better than California Energy Efficiency Standards (Title 24). Builders can receive an incentive of \$400 per home (coastal climates) or \$500 per home (inland climates) if they meet these standards.

On March 2, 2006, the California Public Utilities Commission (Commission) opened a proceeding to develop rules and procedures for the California Solar Initiative (CSI). In addition, on August 21, 2006, the Governor signed Senate Bill 1, which directs the Commission and the CEC to implement the CSI program for the period 2007-2016, consistent with specific requirements and budget limits as set forth in the legislation.

The Commission, through its CSI, provides over \$2 billion in incentives over the next decade for the installation of solar equipment on existing residential homes and existing and new commercial, industrial, and agricultural properties.

The CEC manages a \$350 million program to encourage solar installations in new home construction through its NSHP. As part of the draft NSHP Guidebook, the CEC has proposed to offer additional solar incentives to builders of residential new construction if they exceed Title 24 standards by 35 percent. Accordingly, in this advice letter, PG&E proposes to create a new tier in its energy efficiency RNC program that aligns PG&E's program with the CEC's NSHP by encouraging builders to maximize energy efficiency in conjunction with the installation of solar systems.

Proposed Program Changes

To align with the CEC's program, PG&E proposes to modify the existing RNC program by creating a second tier; thus, creating a two-tier program. The first tier is the already existing RNC program and incentive level, and the second tier would provide a higher incentive for builders who meet the more stringent energy efficiency requirements. The two-tiered RNC program would be structured as follows:

Tier 1: (1) exceed Title 24 standards by 15 percent; and (2) include CEC-required ENERGY STAR appliances.

- Incentive per home of \$400 for coastal climate zones and \$500 for inland climate zones.

Tier 2: (1) exceed Title 24 standards by 35 percent; (2) include CEC-required ENERGY STAR appliances; (3) a 40 percent reduction in cooling; and (4) install solar on the premises.

- Incentive per home of \$2000.

This restructured program will maximize energy efficiency in homes installing solar systems and improve the cost-effectiveness of the current program. The increase in the incentive level for Tier 2 will encourage builders to maximize the efficiency of the home making it easier for the builder to size an appropriate solar system.

The total budget for the RNC program is unchanged² and below is a table presenting key indicators of this redesigned RNC program:

Budget	\$20.0 million
Peak kW	5,577
Annual kWh	5,997,300
Annual Therms	2,148,930
Total Resource Cost (TRC)	0.88
TRC levelized \$/kWh	0.1525
TRC levelized \$/Therm	1.14
Program Administrator Cost (PAC)	1.40
PAC levelized \$/kWh	0.0965
PAC levelized \$/Therm	0.72

The cost-effectiveness of the two tiers in the RNC program is close to that of the existing program. PG&E had additional analysis done by Enercomp, the author of Micropas, the state-approved energy savings calculator for residential new construction, to ensure that the energy savings numbers are more representative of the housing stock in PG&E's service area. The energy savings numbers used for Tier 1 are the average energy savings from the projects currently in the 2006 RNC program. For Tier 2 energy savings, PG&E uses Micropas's analysis. The E3 Calculator was used to calculate both Tier 1 and Tier 2 energy savings and cost-effectiveness.³

PG&E recommends that the Commission approve this advice letter so that the additional tier can be in place at the beginning of 2007 in conjunction with the implementation of the CEC's NSHP.

² The third-party activities in this program are unaffected by these changes.

³ Additional workpapers presenting calculations are available by written request to PGETariffs@pge.com.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than **December 21, 2006**, which is 20 days after the date of this filing. Protests should be mailed to:

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

Facsimile: (415) 703-2200
E-mail: ijnj@cpuc.ca.gov and mas@cpuc.ca.gov

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

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

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

Facsimile: (415) 973-7226
E-mail: PGETariffs@pge.com

Effective Date

According to D.05-09-043 (p.153), "unless suspended, advice letters that are not protested or acted upon in some way by the Commission within 30 days are "deemed approved." Hence, PG&E requests that this program be approved effective **January 1, 2007**, to coincide with the implementation of the CEC's New Solar Homes Partnership program.

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 PG&E's 2006-2008 Energy Efficiency Application (A.05-06-004) and the Distributed Generation Rulemaking (R.06-04-003). Address changes to the General Order 96-A service list 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>

Handwritten signature of Brian K. Cheng in black ink.

Vice President, Regulatory Relations

cc: Service Lists A.05-06-004, R.06-03-004

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) #: **2787-G/2941-E**

Subject of AL: Modification of the Existing Energy Efficiency Residential New Construction Program to Align with the California Energy Commission's New Solar Homes Partnership

Keywords (choose from CPUC listing): Energy Efficiency

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: No

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

Resolution Required? Yes No

Requested effective date: **January 1, 2007**

No. of tariff sheets: 0

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 proposed¹: Existing Energy Efficiency Residential New Construction Program

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

Tariff Files, Room 4005

DMS Branch

505 Van Ness Ave.,

San Francisco, CA 94102

ijnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Brian K. Cherry

Vice President, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

¹ Discuss in AL if more space is needed.

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

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