

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 24, 2008

Advice Letter 2959-G

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

**Subject: Gas Rule 21 In-kind Shrinkage Allowance Adjustments
for Backbone Transmission and Distribution**

Dear Mr. Cherry:

Advice Letter 2959-G is effective November 1, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Lewis".

Kenneth Lewis, Acting Director
Energy Division



September 30, 2008

Advice 2959-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Gas Rule 21 In-kind Shrinkage Allowance Adjustments for Backbone Transmission and Distribution

Pacific Gas and Electric Company (PG&E) hereby submits for filing revisions to the natural gas in-kind shrinkage allowances for backbone transmission and distribution service shown in PG&E's gas Rule 21—*Transportation of Natural Gas*. The affected tariff sheets are listed on the enclosed Attachment I.

Purpose

In-kind shrinkage allowances represent the unaccounted-for gas and the utility fuel use attributable to the volume of natural gas received by PG&E for transmission, distribution and storage service. In Decision (D.) 03-12-061, the Commission authorized the shrinkage allowances to be updated annually or as necessary at other times of the year to match the actual shrinkage experienced on PG&E's system. This is reflected in Gas Preliminary Statement Part C—*Gas Accounting Terms and Definitions*, Part C.12.c, and gas Rule 21, which state that PG&E may adjust distribution, transmission and storage shrinkage annually through an advice letter compliance filing, or as necessary at other times of the year through a separate advice letter filing.

PG&E proposes revisions to the existing backbone transmission and distribution shrinkage allowances to be effective November 1, 2008. These revisions update the shrinkage allowances to reflect the current shrinkage forecast for 2009 and to recover a shrinkage under-collection from prior years.

Annual Shrinkage Forecast Update

The proposed shrinkage allowances are calculated using PG&E's latest forecast of shrinkage on its system and PG&E's 2009 customer demand forecast recently published in the 2008 California Gas Report. The total shrinkage allowances, and the individual components of the Shrinkage Base Allowance and Shrinkage

Adjustment Allowance, being proposed in this filing are shown in the following table:

Proposed Total In-kind Shrinkage Allowance

	Current Total Allowance	Proposed Base Allowance	Proposed Adjustment Allowance	Proposed Total Allowance	Proposed Total Change
Transmission – Redwood to Off- System	0.9%	0.9%	0.0%	0.9%	--
Transmission – Mission to On/Off- System	0.0%	0.0%	0.0%	0.0%	--
Transmission – All other backbone paths	1.3%	1.2%	0.1%	1.3%	--
Distribution – Noncore	0.2%	0.2%	0.0%	0.2%	--
Distribution – Core	3.1%	2.9%	0.4%	3.3%	0.2%

The proposed shrinkage allowances are designed to recover PG&E's current shrinkage forecast for 2009 and eliminate an existing under-collection of the in-kind shrinkage volumes.¹ The proposed shrinkage allowances will replace the existing shrinkage allowances, including the existing Base allowance adopted pursuant to Advice Letter 2780-G and the existing Adjustment allowance adopted pursuant to Advice Letter 2655-G. PG&E estimates that the proposed Adjustment allowance will recover the existing under-collection over a six-year period, however the actual time required to recover the under-collection will depend on future system throughput. PG&E will continue to monitor the under-collection and will adjust the shrinkage allowances through separate advice letter filings in the future as necessary.

This filing will not affect any other rate or charge, cause the withdrawal of service, or conflict with any other rate schedule or rule. Workpapers supporting the proposed changes is included in Attachment 2 to this filing.

¹ PG&E's proposal to recover the existing under-collection through the shrinkage Adjustment allowance is consistent with the methodology previously approved by the Commission in Advice 2365-G and Advice 2655-G.

Tariff Revisions

The transmission shrinkage percentages reflected in Gas Rule 21 Section B.1.a have been reviewed and it has been determined that the current percentages are sufficient. The revised distribution shrinkage allowance percentages are reflected in Gas Rule 21 B.1.b.

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 **October 20, 2008**, which is 20 days from 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: jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Copies 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

In order to provide gas transportation customers notice of the shrinkage change, PG&E requests notice of this advice letter approval by October 24, 2008, and that

the tariffs be approved effective November 1, 2008. PG&E will inform gas transportation customers of the new shrinkage allowance on its Pipe Ranger website: <http://www.pge.com/pipeline/> once this filing is approved.

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 the service list for A.04-07-044. Address changes should be directed to Rose De La Torre (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. Cheery". The signature is written in a cursive style and is positioned above the typed name.

Vice President – Regulatory Relations

Attachments:

cc: Service List 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 (ID U39 M)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Megan Lawson

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) #: 2959-G

Tier: [2]

Subject of AL: Gas Rule 21—In-kind Shrinkage Allowance Adjustments for Backbone Transmission and Distribution

Keywords: Rules

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: 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: No

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

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

Resolution Required? Yes No

Requested effective date: November 1, 2008

No. of tariff sheets: 4

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 Rule 21

Service affected and changes proposed:

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

Tariff Files, Room 4005

DMS Branch

505 Van Ness Ave., San Francisco, CA 94102

jn@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

**ATTACHMENT 1
Advice 2959-G**

**Cal P.U.C.
Sheet No.**

Title of Sheet

**Cancelling Cal
P.U.C. Sheet No.**

27240-G	GAS RULE NO. 21 TRANSPORTATION OF NATURAL GAS Sheet 2	24303-G
27241-G	GAS RULE NO. 21 TRANSPORTATION OF NATURAL GAS Sheet 3	24304-G
27242-G	GAS TABLE OF CONTENTS Sheet 1	27232-G
27243-G	GAS TABLE OF CONTENTS Sheet 6	27166-G



GAS RULE NO. 21
 TRANSPORTATION OF NATURAL GAS

Sheet 2

B. QUANTITIES OF GAS (Cont'd.)

1. IN-KIND SHRINKAGE ALLOWANCE (Cont'd.)

a. Backbone Transmission Shrinkage

A Customer transporting gas over PG&E's Backbone Transmission System shall deliver each day at the Receipt Point to PG&E an additional in-kind quantity of natural gas supply equal to a percent of total volume of natural gas to be delivered at the Receipt Point. Thus, the quantity to be nominated at the Receipt Point equals the quantity desired at the Delivery Point divided by (1 - x) where x is the decimal equivalent of the Backbone Transmission System In-Kind Shrinkage Allowance percentage, based on the transmission path utilized as follows:

Path	Percentage of In-Kind Shrinkage Base Allowance	Percentage of In-Kind Shrinkage Adjustment	Percentage of Effective In-Kind Shrinkage Allowance
Redwood to Off-System	0.9	-	0.9
Mission to On-System	0	-	0
Mission to Off-System	0	-	0
All other transmission	1.2	0.1	1.3

Provided, however, that PG&E and the Customer shall not be prohibited under this Rule, where shrinkage requirements support a different shrinkage allowance, from mutually agreeing to a different shrinkage allowance for transportation over PG&E's Backbone Transmission System.

(Continued)



GAS RULE NO. 21
 TRANSPORTATION OF NATURAL GAS

Sheet 3

B. QUANTITIES OF GAS (Cont'd.)

1. IN-KIND SHRINKAGE ALLOWANCE (Cont'd.)

b. Distribution Shrinkage

For transportation on PG&E's Distribution System, an additional In-Kind Shrinkage Allowance shall apply, which is separate from backbone transmission and storage shrinkage. The Customer shall deliver each day to PG&E at the Citygate an additional in-kind quantity of natural gas supply equal to a percent of the total volume of natural gas flowing through the End-Use Customer's meter. Thus, the quantity to be nominated at the Citygate equals the quantity to be flowed through the meter multiplied by $(1 + y)$ where y is the decimal equivalent of the Distribution System In-Kind Shrinkage Allowance percentage, as follows:

End-Use Customer	Percentage of In-Kind Shrinkage Base Allowance	Percentage of In-Kind Shrinkage Adjustment	Percentage of Effective In-Kind Shrinkage Allowance
Core	2.9 (I)	0.4	3.3 (I)
Noncore Distribution	0.2	0	0.2
Noncore Transmission*	-	-	-

As an example, for a Core End-Use Customer being served via the Redwood Path, the amount to be nominated at Malin is calculated as:

$$\text{Receipt Point Quantity} = \frac{\text{Est. Metered Usage} \times (1 + y)}{(1 - x)}$$

Where: x = decimal equivalent of the Backbone Shrinkage percentage, and

y = decimal equivalent of the Distribution Shrinkage percentage

* Noncore Transmission Level End-Use Customers or Agents require no Distribution System In-Kind Shrinkage Allowance.

(Continued)



GAS TABLE OF CONTENTS

Sheet 1

TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page	27242-G	(T)
Rate Schedules	27233, 27234-G	
Preliminary Statements	27235, 24225-G	
Rules	27243-G	(T)
Maps, Contracts and Deviations	21637-G	
Sample Forms	26520, 24933, 24369, 26572, 25059-G	

(Continued)



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Sheet 6

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Rules		
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Rule 02	Description of Service.....	23062-23066,26825-G
Rule 03	Application for Service.....	13842,24127-G
Rule 04	Contracts.....	17051-G
Rule 05	Special Information Required on Forms.....	17641,13348-13349-G
Rule 06	Establishment and Reestablishment of Credit.....	22126-22127,18873-G
Rule 07	Deposits.....	18212-18213-G
Rule 08	Notices.....	21928,17580,21929,17581,15728-G
Rule 09	Rendering and Payment of Bills.....	24128-24129,27164,23518,24856,24130, 21985,21936-G
Rule 10	Disputed Bills.....	18214-18216-G
Rule 11	Discontinuance and Restoration of Service.....	18217-18220,23519-23520, 18223-18227,24859,24860,19710-G
Rule 12	Rates and Optional Rates.....	18229,24131-24132,21981-21982,24474-G
Rule 13	Temporary Service.....	22832-G
Rule 14	Capacity Allocation and Constraint of Natural Gas Service.....	18231-18235,22327, 22328-22330,18239,22249,22073,22639,22075-22077,18244,22078-22079,24475,22081-G
Rule 15	Gas Main Extensions.....	21543,18802-18803,26826,20350-20352,26827,21544, 21545,22376,22377,22378,22379,26828,26829,18814-G
Rule 16	Gas Service Extensions.....	21546,18816,17728,17161,18817-18825,17737, 18826,18827-G
Rule 17	Meter Tests and Adjustment of Bills for Meter Error.....	14450-14452,24133,14454, 14455,14456-G
Rule 17.1	Adjustment of Bills for Billing Error.....	22936,14458-G
Rule 17.2	Adjustment of Bills for Unauthorized Use.....	22937,14460,14461-G
Rule 18	Supply to Separate Premises and Submetering of Gas.....	22790,17796,13401-G
Rule 19	Medical Baseline Quantities.....	21119,21120,21121-G
Rule 19.1	California Alternate Rates for Energy for Individual Customers and Submetered Tenants of Master-Metered Customers.....	24135, 26993 ,23522,24136-G
Rule 19.2	California Alternate Rates for Energy for Nonprofit Group-Living Facilities	24609, 26994 ,17035,17134,23525-G
Rule 19.3	California Alternate Rates for Energy for Qualified Agricultural Employee Housing Facilities	24138, 26995 ,23445,23527-G
Rule 21	Transportation of Natural Gas.....	22313,27240, 27241,23786,23194,23195, 21845,23196-23199,22086-22087,24444-24445,22735,22736,22737-G (T)
Rule 21.1	Use of Pacific Gas and Electric Company's Firm Interstate Rights	20461,18260,18261-G
Rule 23	Gas Aggregation Service for Core Transport Customers.....	24476,18263,26664,18265, 26665-26666,24825-24830,26667,24832-24833,24849,21750-21751,18272-G
Rule 25	Gas Services-Customer Creditworthiness and Payment Terms.....	24479,21410,24480, 24481,24482,24483,24484,24485,24486,21418-G
Rule 26	Standards of Conduct and Procedures Related to Transactions with Intracompany Departments, Reports of Negotiated Transactions, and Complaint Procedures	18284,18285,18633,20462-G

(Continued)

Attachment 2

Workpapers

PACIFIC GAS AND ELECTRIC COMPANY
Workpaper for Annual Shrinkage Allowance Update - 2009
Advice 2959-G (effective November 1, 2008)
Shrinkage Base Allowance

	(A)	(B)	(C)	(D)	(E)	(F)	
	<i>Forecast Demand from the 2008 California Gas Report, distributed July 31, 2008. Off-System forecast is equal to the three-year average off-system actual deliveries. LUAF and GDU forecast based on a three-year average of the monthly profile of the incurrence of LUAF and GDU. GDU forecast adjusted by 200 MDth to reflect expected higher compressor usage based on recent history. LUAF forecast adjusted by 2700 MDth to reflect an expected reduction in LUAF due to the planned implementation of a Gas Register Constant Project in January 2009.</i>						
Line No.		12 Month Forecast	% Served from Distr.	% Served from Trans.	Throughput Served from Trans.	Throughput Served from Distr.	Line No.
1	Noncore Transmission/Distribution Split	Mdth	Survey Results		Mdth	Mdth	1
2	Industrial	167,291	15.7691%	84.2309%	140,910	26,380	2
3	EG	186,631	0.0000%	100.0000%	186,631	0	3
4	Cogeneration	73,617	9.5985%	90.4015%	66,551	7,066	4
5	Wholesale	3,712	0.8427%	99.1573%	3,681	31	5
6	NGV4	471	0.0000%	100.0000%	471	0	6
7	Total Noncore (excludes EOR and SEGDA)	431,722			398,244	33,478	7
8	% of Noncore served from Trans. and Distr.				92.25%	7.75%	8
LUAF per Study (from the Gas Accord I Workpapers, 17-2 & 17-3)							
Splits LUAF noncore volumes between distribution and transmission based on LUAF Study							
9		NCTotal			NC Trans.	NC Distr.	9
10	LUAF (Mcf) - volumes from 1995 BCAP	3,054,276			2,268,089	786,187	10
11	LUAF % (NC Distr Vol/NC Total)				74.26%	25.74%	11
12	Throughput Vol. % - Data from Rate Dept Survey				79.00%	21.00%	12
13	Ratios set for Accord period:						13
14	Calculated as Line 11/Line 12				0.94	1.23	14
15	Calculated as (F) line 14/(E) line 14					1.30	15
16	Noncore % of System LUAF (adopted in 95 BCAP)	22.00%					16
LUAF & GDU Allocations to Transmission and Distribution							
		System Forecast	Core	Noncore	Off-system	NC Trans.	NC Distr.
17	LUAF allocated volumes (less off-sys LUAF; core/noncore 78%/22%)	13,838	10,552	2,976	309		
18	Throughput per forecast (Mdth)	827,404	298,719	434,913	93,772		
19	Less: SEGDA	(3,191)		(3,191)			
20	Totals for Calculation of allocation	824,213	298,719	431,722	93,772		
21	LUAF as % of throughput (Lines 17/20)	1.679%	3.532%	0.689%	0.330%		
22	Noncore Trans. LUAF% ((D) line 21 - wtd. per surveys above)					0.674%	
23	Noncore Distr. LUAF% (D) line 21 - wtd. per surveys above)						0.878%
24	Off-System LUAF (per D.94-02-042)	0.33%					
		Same for all customers					
25	GDU per forecast(Mdth) - Pipeline (Total less storage GDU)	4,301					
26	GDU % = (B) line 24/(B) line 20	0.522%					
	Shrinkage (LUAF+GDU)						
27	Noncore Transmission = (B) line 26 + (E) line 22	1.195%					
28	Noncore Distribution = (B) line 26 + (F) line 23	1.400%					
29	Core Total = (B) line 26 + (C) line 21	4.054%					
30	Core Distribution = (B) line 29 - (B) line 27	2.859%					
31	Off-System Transmission = (B) line 26 + (B) line 24	0.852%					
32	Proposed Pipeline Shrinkage Allowances - Annual Update		Core	NC Trans.	NC Dist.	Off-Sys.	32
33	Transmission (assumes same % for core and noncore)		1.2%	1.2%	1.2%	0.9%	33
34	Distribution		2.9%	N/A	0.2%	N/A	34
35	Total		4.1%	1.2%	1.4%	0.9%	35

PACIFIC GAS AND ELECTRIC COMPANY
Workpaper for Annual Shrinkage Allowance Update - 2009
Advice 2959-G (effective November 1, 2008)
Shrinkage Adjustment Allowance

	(A)	(B)	(C)	(D)	(E)	(F)	
<i>Forecast Demand from the 2008 California Gas Report that was distributed July 31, 2008. Current under-collection of 12.3 MMDth (as of May 2008 -- most current data available) is amortized over six years; resulting in an annual recovery quantity of 2050 MDth. The under-collection is allocated in the same manner as LUAF.</i>							
Line No.		12 Month Forecast Throughput	% Served from Distr.	% Served from Trans.	Throughput Served from Trans.	Throughput Served from Distr.	Line No.
1	Noncore Transmission/Distribution Split	Mdth	Survey Results		Mdth	Mdth	1
2	Industrial	167,291	15.7691%	84.2309%	140,910	26,380	2
3	EG	186,631	0.0000%	100.0000%	186,631	0	3
4	Cogeneration	73,617	9.5985%	90.4015%	66,551	7,066	4
5	Wholesale	3,712	0.8427%	99.1573%	3,681	31	5
6	NGV4	471	0.0000%	100.0000%	471	0	6
7	Total Noncore (excludes EOR and SEGDA)	431,722			398,244	33,478	7
8	% of Noncore served from Trans. and Distr.				92.25%	7.75%	8
LUAF per Study (from the Gas Accord I Workpapers, 17-2 & 17-3)							
Splits LUAF noncore volumes between distribution and transmission based on LUAF Study							
9		NC Total			NC Trans.	NC Distr.	9
10	LUAF (Mcf) - volumes from 1995 BCAP	3,054,276			2,268,089	786,187	10
11	LUAF % (NC Distr Vol/NC Total)				74.26%	25.74%	11
12	Throughput Vol. % - Data from Rate Dept Survey				79.00%	21.00%	12
13	Ratios set for Accord period:						13
14	Calculated as Line 11/Line 12				0.94	1.23	14
15	Calculated as (F) line 14/(E) line 14					1.30	15
16	Noncore % of System LUAF (adopted in 95 BCAP)	22.00%					16
LUAF & GDU Allocations to Transmission and Distribution							
		System Forecast	Core	Noncore	Off-system	NC Trans.	NC Distr.
17	LUAF allocated volumes (less off-sys LUAF; core/noncore 78%/22%)	2,050	1,599	451	-		
18	Throughput per forecast (Mdth)	827,404	298,719	434,913	93,772		
19	Less: SEGDA	(3,191)		(3,191)			
20	Totals for Calculation of allocation	824,213	298,719	431,722	93,772		
21	LUAF as % of throughput (Lines 17/20)	0.249%	0.535%	0.104%	0.000%		
22	Noncore Trans. LUAF% ((D) line 21 - wtd. per surveys above)					0.102%	
23	Noncore Distr. LUAF% (D) line 21 - wtd. per surveys above)						0.133%
24	Off-System LUAF (per D.94-02-042)	0.00%					
		Same for all customers					
25	GDU per forecast(Mdth) - Pipeline (Total less storage GDU)	-					
26	GDU % = (B) line 24/(B) line 20	0.000%					
Shrinkage (LUAF+GDU)							
27	Noncore Transmission = (B) line 26 + (E) line 22	0.102%					
28	Noncore Distribution = (B) line 26 + (F) line 23	0.133%					
29	Core Total = (B) line 26 + (C) line 21	0.535%					
30	Core Distribution = (B) line 29 - (B) line 27	0.433%					
31	Off-System Transmission = (B) line 26 + (B) line 24	0.000%					
32	Proposed Pipeline Shrinkage Adjustment Allowance		Core	NC Trans.	NC Dist.	Off-Sys.	32
33	Transmission (assumes same % for core and noncore)		0.1%	0.1%	0.1%	0.0%	33
34	Distribution		0.4%	N/A	0.0%	N/A	34
35	Total		0.5%	0.1%	0.1%	0.0%	35

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

Aglet	Department of the Army	Northern California Power Association
Agnews Developmental Center	Dept of General Services	Occidental Energy Marketing, Inc.
Alcantar & Kahl	Division of Business Advisory Services	OnGrid Solar
Ancillary Services Coalition	Douglas & Liddell	PPL EnergyPlus, LLC
Anderson & Poole	Douglass & Liddell	Pinnacle CNG Company
Arizona Public Service Company	Downey & Brand	Praxair
BART	Duke Energy	R. W. Beck & Associates
BP Energy Company	Duncan, Virgil E.	RCS, Inc.
Barkovich & Yap, Inc.	Dutcher, John	RMC Lonestar
Bartle Wells Associates	Ellison Schneider & Harris LLP	Recon Research
Blue Ridge Gas	Energy Management Services, LLC	SCD Energy Solutions
Braun & Associates	FPL Energy Project Management, Inc.	SCE
C & H Sugar Co.	Foster Farms	SESCO
CA Bldg Industry Association	Foster, Wheeler, Martinez	SMUD
CAISO	Franciscan Mobilehome	SPURR
CLECA Law Office	G. A. Krause & Assoc.	Santa Fe Jets
CSC Energy Services	GLJ Publications	Seattle City Light
	Goodin, MacBride, Squeri, Schlotz & Ritchie	Sempra Utilities
California Cotton Ginners & Growers Assn	Green Power Institute	Sequoia Union HS Dist
California Energy Commission	Hanna & Morton	Sierra Pacific Power Company
California League of Food Processors	Heeg, Peggy A.	Silicon Valley Power
California Public Utilities Commission	Hitachi	Smurfit Stone Container Corp
Calpine	Hogan Manufacturing, Inc.	Southern California Edison Company
Cameron McKenna	Imperial Irrigation District	St. Paul Assoc.
Cardinal Cogen	Innercite	Sunshine Design
Casner, Steve	International Power Technology	Sutherland, Asbill & Brennan
Cerox	Intestate Gas Services, Inc.	TFS Energy
Chamberlain, Eric	J. R. Wood, Inc.	Tabors Caramanis & Associates
Chevron Company	JTM, Inc.	Tecogen, Inc.
Chris, King	Los Angeles Dept of Water & Power	Tioga Energy
City of Glendale	Luce, Forward, Hamilton & Scripps LLP	TransCanada
City of Palo Alto	MBMC, Inc.	Turlock Irrigation District
City of San Jose	MRW & Associates	U S Borax, Inc.
Clean Energy Fuels	Manatt Phelps Phillips	United Cogen
Coast Economic Consulting	Matthew V. Brady & Associates	Utility Cost Management
Commerce Energy	McKenzie & Associates	Utility Resource Network
Commercial Energy	Meek, Daniel W.	Utility Specialists
Constellation	Merced Irrigation District	Vandenberg Air Force
Constellation New Energy	Mirant	Verizon
Consumer Federation of California	Modesto Irrigation District	Wellhead Electric Company
Crossborder Energy	Morgan Stanley	Western Manufactured Housing Communities Association (WMA)
		White & Case
Davis Wright Tremaine LLP	Morrison & Foerster	eMeter Corporation
Day Carter Murphy	New United Motor Mfg., Inc.	
Defense Energy Support Center	Norris & Wong Associates	
Department of Water Resources	North Coast SolarResources	