

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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August 9, 2010

Advice Letter 3132-G

Jane K. Yura
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10B
P.O. Box 770000
San Francisco, CA 94177

**Subject: Report on the Adequacy of PG&E Company's Backbone
Transmission Capacity Holdings and Capacity Utilization
in Compliance with D.06-09-039**

Dear Ms. Yura:

Advice Letter 3132-G is effective August 2, 2010.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director
Energy Division



Jane K. Yura
Vice President
Regulation and Rates

Pacific Gas and Electric Company
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July 1, 2010

Advice 3132-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Report on the Adequacy of Pacific Gas and Electric Company's Backbone Transmission Capacity Holdings and Capacity Utilization in Compliance With Decision 06-09-039

Pacific Gas and Electric Company ("PG&E") hereby submits for filing a compliance report on the adequacy of PG&E's backbone transmission capacity holdings and slack capacity consistent with PG&E's proposals in Phase II of the Gas Capacity OIR, Decision ("D.") 06-09-039.

Purpose

The purpose of this advice letter and the attached report is to comply with Ordering Paragraph 3 in D.06-09-039 and to provide the California Public Utilities Commission ("Commission") with an update on PG&E's backbone transmission capacity utilization outlook. Ordering Paragraph 3 states:

3. The Pacific Gas and Electric Company and the Southern California Gas Company shall demonstrate in biennial advice letter filings to the Commission's Energy Division starting in 2008 that they hold adequate backbone transmission capacity and have slack capacity consistent with their proposals presented herein. The first filing is due July 1, 2008.

Background

In 2004, the Commission issued Rulemaking R.04-01-025 to investigate the adequacy of natural gas supplies and infrastructure to meet the long-term needs of the gas consumers in California. In D.06-09-039, the Commission determined that it was "comfortable with the total amount of firm backbone transmission capacity on both the

PG&E and SoCal Gas systems.”¹ To ensure that the utilities monitor the adequacy of their backbone capacity, the Commission required that the utility make biennial advice letter filings, starting in 2008, to demonstrate that they have adequate backbone capacity consistent with the showings made in Rulemaking 04-01-025. This advice letter is the second biennial filing.

Summary of Report

Based on the information contained in the attached report, PG&E has adequate backbone transmission capacity to ensure that both current and forecast demand can be met based on the criteria adopted in D.06-09-039 through 2020.²

The adequacy of PG&E’s backbone transmission capacity holdings to serve core and electric customers has historically been addressed in the Gas Accord and Long-Term Procurement Plan proceedings. PG&E believes that these are the appropriate forums in which to address this issue and, therefore, will limit comments in both the advice letter and the report to addressing the adequacy of system capacity relative to current and forecast demand.

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 **July 21, 2010**, 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: jjn@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:

¹ D.06-09-039, Finding of Fact 12.

² In order to address the adequacy of PG&E’s infrastructure to meet current and future demand, PG&E uses the demand forecasts based on the upcoming 2010 California Gas Report.

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Effective Date

PG&E requests that this advice filing become effective on regular notice, **August 2, 2010**,³ which is 32 calendar days after the date of filing.

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 service list for R.04-01-025. Address changes to the General Order 96-B service list should be directed to e-mail PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>.

A handwritten signature in cursive script that reads "Jane Yura /emt". The signature is written in black ink and is positioned above the typed name and title.

Vice President - Regulation and Rates

cc: Service List R.04-01-025

Attachments

³ July 31, 2010 falls on a weekend, therefore, PG&E is moving this date to the following business day.

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: Linda Tom-Martinez

Phone #: (415) 973-4612

E-mail: lmt1@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) #: **3132-G**

Tier: 2

Subject of AL: Report on the Adequacy of Pacific Gas and Electric Company's Backbone Transmission Capacity Holdings and Capacity Utilization in Compliance With Decision 06-09-039

Keywords (choose from CPUC listing): Capacity, Compliance,

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.06-09-039

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: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for:

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

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

Resolution Required? Yes No

Requested effective date: **August 2, 2010**

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

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

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

CPUC, Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Ave.,
San Francisco, CA 94102
jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company
Attn: Jane Yura
Vice President, Regulation and Rates
77 Beale Street, Mail Code B10B
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

**PACIFIC GAS AND ELECTRIC COMPANY
COMPLIANCE REPORT ON THE ADEQUACY OF PACIFIC GAS
AND ELECTRIC COMPANY'S BACKBONE TRANSMISSION
CAPACITY HOLDINGS AND CAPACITY UTILIZATION**

PACIFIC GAS AND ELECTRIC COMPANY
ADEQUACY OF BACKBONE TRANSMISSION CAPACITY HOLDINGS AND
CAPACITY UTILIZATION

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1 **PACIFIC GAS AND ELECTRIC COMPANY**
2 **ADEQUACY OF BACKBONE TRANSMISSION CAPACITY**
3 **HOLDINGS AND CAPACITY UTILIZATION**

4 **A. Introduction**

5 In Decision 06-09-039, the California Public Utilities Commission
6 (Commission) adopted a natural gas transportation backbone capacity utilization
7 guideline for Pacific Gas and Electric Company (PG&E) and Southern California
8 Gas Company (SoCal Gas). This guideline states that if utilization of intrastate
9 backbone transmission capacity exceeds 80-90 percent on a forecast basis, an
10 expansion of capacity may be needed. This guideline is set as a range in order
11 to provide the utilities with flexibility to manage how and when to make new
12 infrastructure investments.

13 Decision 06-09-039 required that “the Pacific Gas and Electric Company and
14 the Southern California Gas Company shall demonstrate in biennial advice letter
15 filings to the Commission’s Energy Division starting 2008 that they hold
16 adequate backbone transmission capacity and have slack capacity consistent
17 with their proposals presented herein. The first filing is due July 1, 2008.”**[1]**

18 In compliance with the Commission’s direction, this filing updates the
19 analysis PG&E made in Phase II of Gas Capacity OIR (R.04-01-025) and in the
20 previous compliance filing. This updated assessment contains PG&E’s analysis
21 of backbone transmission capacity covering the period 2011-2020.

22 **B. Adequacy of PG&E’s Backbone Transmission Capacity**
23 **Holdings**

24 Since 1996, PG&E’s intrastate backbone transmission capacity holdings to
25 serve core customers have been determined through PG&E’s Gas Transmission
26 and Storage Rate Case Applications, also known as PG&E’s Gas Accord. The
27 Gas Accord has provided stability in gas transmission and storage services,
28 while providing, among other things, the opportunity for all participating parties to
29 evaluate and update PG&E’s core backbone transmission and storage holdings.
30 PG&E is also compliant with the Commission’s Opinion Regarding the Proposal
31 for Incremental Core Gas Storage, which adopted PG&E’s core planning

[1] See D.06-09-039 at p. 26.

1 standard of a 1-day-in-10-year peak day and authorized acquisition of
2 incremental storage capacity, firm intrastate and interstate pipeline capacity,
3 and/or firm peaking supply arrangements to meet the standard.² PG&E
4 successfully acquired incremental storage capacity to meet the standard through
5 the 2010-2011 winter periods and will evaluate alternatives for subsequent
6 winter periods.

7 For bundled electric customers, these contractual arrangements are
8 determined through the Long-Term Procurement Plan (LTPP). In
9 Rulemaking 08-02-007, the Commission consolidated “the vast body of
10 procurement-related policies and procedures into one, single, comprehensive,
11 and authoritative document—the 2006 LTPPs.”^[3] PG&E’s original proposal for
12 the long-term gas supply plan was not accepted by the Commission in
13 Decision 07-12-050 because at that time, the Commission needed to address
14 and review the proposals by the Investor Owned Utilities (IOUs) more thoroughly
15 and assess the proposals in conjunction with other rulemaking proceedings.
16 PG&E, therefore, will re-file its long-term gas supply plan with the 2010 LTPP.

17 PG&E believes that the Gas Accord rate proceedings and the LTPP are the
18 appropriate forums in which to address the adequacy of PG&E’s intrastate
19 contractual holdings for the core and bundled electric portfolios, respectively.

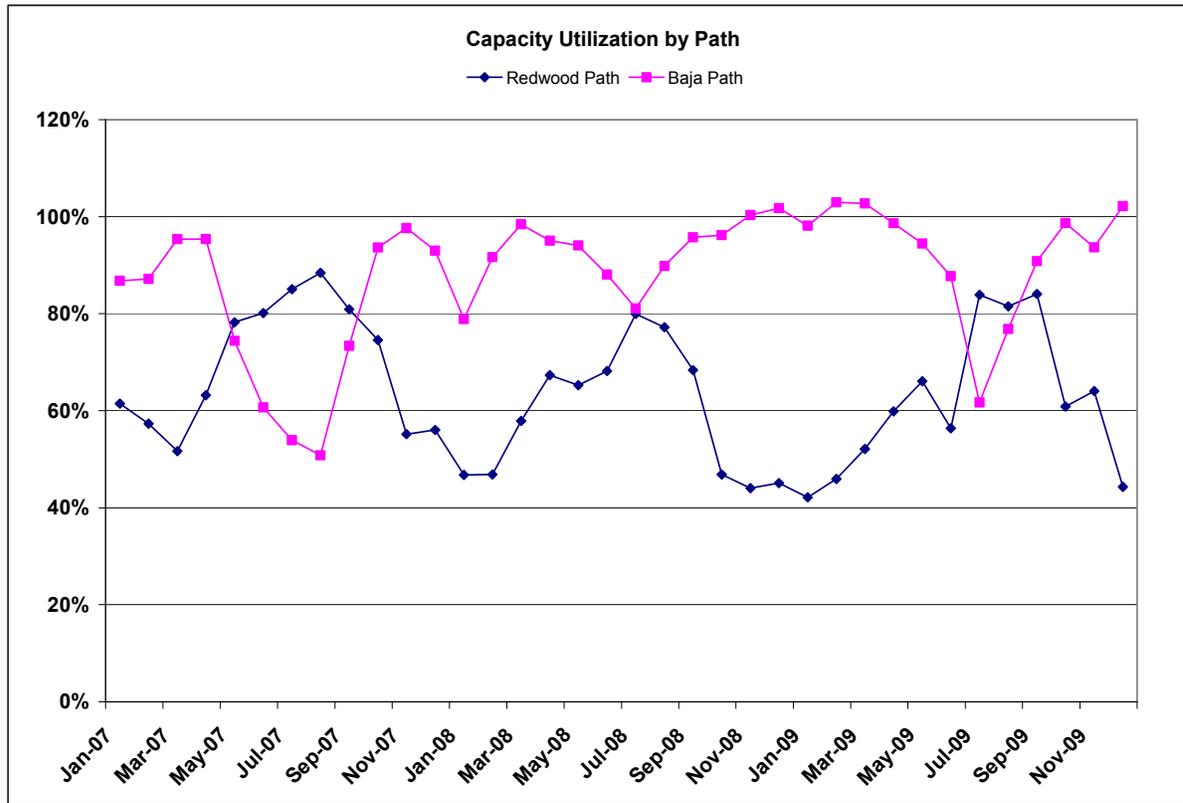
20 **C. Backbone Capacity Utilization**

21 Available capacity provides significant value to customers even in years
22 without outages, supply disruptions or increased demand. Additional pipeline
23 capacity allows the market flexibility to move purchases between receipt points,
24 which results in more gas-on-gas competition at the PG&E Citygate. Additional
25 pipeline capacity, when combined with storage, also provides significant
26 flexibility for customers to time their gas purchases throughout the year. Figure
27 1 shows how the market utilizes the additional pipeline capacity to facilitate gas-
28 on-gas competition. The path with the highest utilization changes from season to
29 season and sometimes from month to month as the market seeks gas supplies
30 from the lowest priced source.

2 See D. 06-07-010, Ordering Paragraph 1, at p. 36.

[3] See R.08-02-007 at p. 5.

**FIGURE 1
PACIFIC GAS AND ELECTRIC COMPANY
CAPACITY UTILIZATION BY PATH**

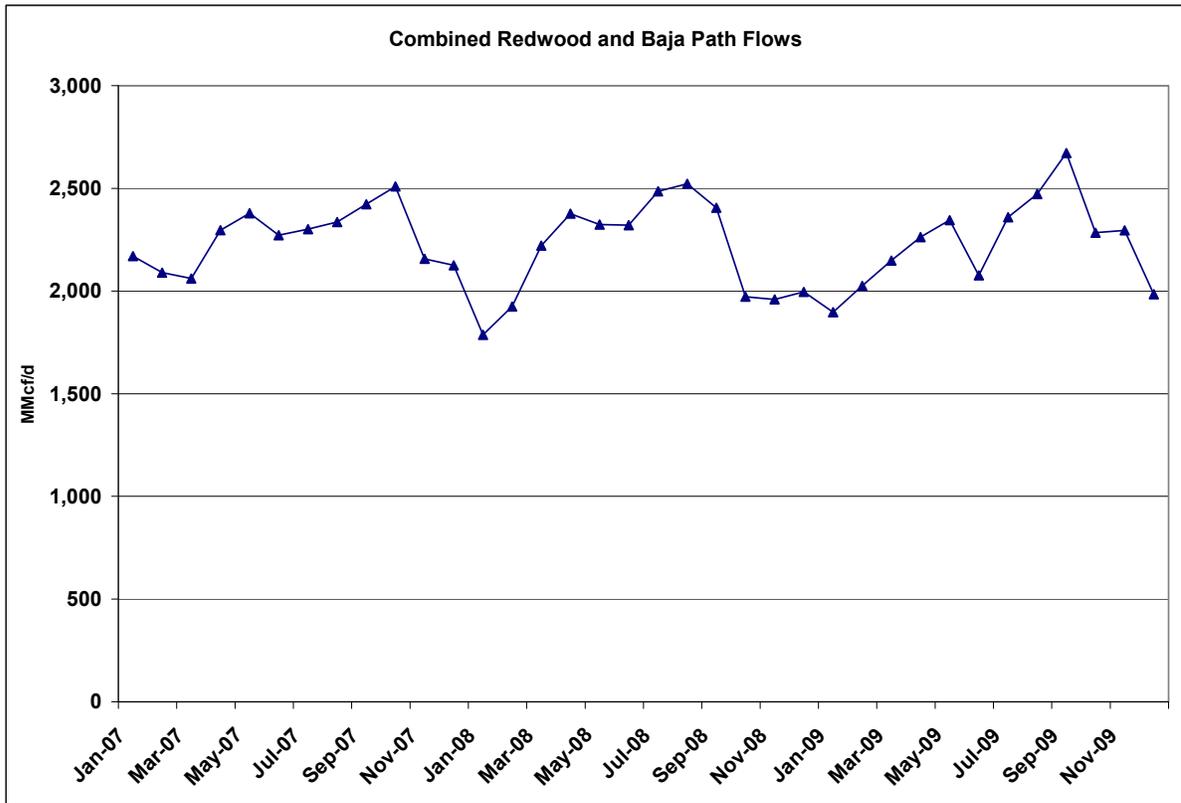


1 In November and December 2008, PG&E’s Baja path operated at full
2 capacity^[4] for the month and PG&E’s Redwood path operated at 44 percent.
3 By July 2009, PG&E’s Redwood path reached a utilization level of 84 percent
4 while the Baja path dropped to 62 percent. Sufficient backbone capacity
5 ensures that the marginal supply source at the California border is available to
6 compete against any other supply source that might attempt to charge a
7 commodity price higher than the otherwise available marginal supply.

8 A margin of capacity also facilitates the injection of gas into storage.
9 Figure 2 shows the average total backbone throughput by month.

[4] The daily capacities can be higher than the firm capacity quantities used in this analysis due to reduced pressure requirements for the local transmission system and the level and location of off-system deliveries.

**FIGURE 2
PACIFIC GAS AND ELECTRIC COMPANY
COMBINED FLOWS**



1 The months with the highest throughput on PG&E’s backbone system are
2 not always in the months with the highest end-use demand. For example, the
3 aggregate on-system demand on PG&E’s system in January 2009 was 1,073
4 MMcf/d higher than May 2009, but in May 2009 the combined path throughput of
5 the Redwood and Baja paths was 448 MMcf/d higher than January 2009. The
6 market takes advantage of the extra backbone capacity to time the injection and
7 withdrawal of gas to and from the storage fields. Storage injections from the
8 PG&E pipeline system (into all three storage providers—PG&E, Lodi Gas
9 Storage and Wild Goose Gas Storage) — averaged 684 MMcf/d during the
10 month of May 2009. Without the additional backbone capacity on PG&E’s
11 system, customers would be constrained significantly in their ability to time the
12 injection of gas into these storage fields. The ability to time storage injection
13 provides significant value to customers. The price of natural gas can vary
14 substantially from month-to-month and the lowest prices are usually seen in the
15 spring and fall months. It is important to maintain sufficient backbone capacity in

1 order for the market to make large injections in months when natural gas prices
2 are low.

3 **D. Demand Forecasts**

4 In order to address the adequacy of PG&E's infrastructure to meet current
5 and future demand, PG&E uses the demand forecasts based on the upcoming
6 2010 California Gas Report (CGR), which will be published on or around July 1,
7 2010. The CGR provides a comprehensive, long-term outlook for natural gas
8 requirements for both core and non-core markets. Evaluating PG&E's
9 infrastructure using the CGR forecasts provides a valid assessment of the
10 adequacy of PG&E's infrastructure to meet current and future demand through
11 2020.

12 The off-system demand forecast in the 2010 CGR is higher than what is
13 used in this analysis because the CGR off-system forecast included an outlook
14 of short-term arrangements paying less than the full-tariff rate. In the analysis
15 included in this report, PG&E used an off-system forecast based on the current
16 volumes under long-term, full-price contracts. Short-term off-system contracts
17 are excluded from this analysis because PG&E would not increase backbone
18 capacity to serve the off-system market except for customers paying the full tariff
19 rate under a long-term contract, such as PG&E's GX-F customers. This is
20 consistent with the approach that PG&E used in its Phase II testimony in the
21 Gas Capacity OIR (R. 04-01-025).

22 PG&E developed the 1-in-10 Cold and Dry Forecast using the same
23 "Weather Vintage" methodology described in PG&E's analysis of backbone
24 capacity adequacy in Phase II of R.04-01-025. This same methodology was
25 also used in the CGR for the adverse year forecasts, although PG&E's adverse
26 year forecast in that report represents a 1-in-35-year Cold and Dry forecast and
27 not a 1-in-10-year event.

28 The "Weather Vintage" forecast approach was used because of the need to
29 develop a representative year with both Cold and Dry conditions. Cold and Dry
30 conditions are not closely correlated, making it difficult to estimate the probability
31 of weather that is simultaneously a 1-in-10-year cold year and a 1-in-10-year dry
32 year. Adding the results of a 1-in-10-year cold scenario for core demand to a
33 1-in-10-year dry scenario for Electric Generation (EG) demand would produce
34 an unrealistically high forecast of natural gas demand in PG&E's service area,

1 and the combined scenario is much less likely to occur than a 1-in-10-year
2 event. Using the Weather Vintage approach to developing the core and EG
3 forecasts allows for a better measure of the effect on demand from simultaneous
4 Cold and Dry conditions.

5 **E. Adequacy of PG&E's Backbone Transmission Capacity**

6 Table 1 delineates the inputs used for transmission capacities of the PG&E
7 backbone system. Table 2 compares the amount of backbone capacity to
8 forecast demand on the PG&E system between 2011 and 2020. Based on this
9 demand forecast, PG&E expects to have a capacity utilization rate less than
10 80 percent through 2020, well within the utilization criteria established in
11 Decision 06-09-039. While there is uncertainty in this longer-term forecast, there
12 is also lead-time for system enhancements to meet longer-term growth as it
13 develops, should the forecast of system use change over time.

**TABLE 1
PACIFIC GAS AND ELECTRIC COMPANY
TRANSMISSION CAPACITY INPUTS**

Line No.	Transmission Path	Firm Receipt Capacity (MMcf/d)
1	Silverado Path	130
2	Baja Path	1,060
3	Redwood Path	2,033
4	Total	3,223

14 The results of the intrastate capacity utilization analysis are shown in
15 Table 2 below.

**TABLE 2
PACIFIC GAS AND ELECTRIC COMPANY
PG&E BACKBONE CAPACITY UTILIZATION 2011-2020**

Line No.	Year	Average Demand (MMcf/d)	1-in-10 Cold and Dry Year Demand (MMcf/d)	Backbone Receipt Capacity (MMcf/d)	Capacity Utilization Cold and Dry Year Demand
1	2011	2,192	2,349	3,223	73%
2	2012	2,191	2,350	3,223	73%
3	2013	2,236	2,413	3,223	75%
4	2014	2,261	2,454	3,223	76%
5	2015	2,241	2,452	3,223	76%
6	2016	2,250	2,470	3,223	77%
7	2017	2,268	2,500	3,223	78%
8	2018	2,284	2,517	3,223	78%
9	2019	2,236	2,562	3,223	79%
10	2020	2,346	2,559	3,223	79%

1 The capacity utilization of PG&E’s backbone system through 2020 is
2 estimated to grow at less than one percent per year, which should allow for
3 sufficient storage injections over this period. There are three new gas storage
4 projects planned in northern California: Gill Ranch storage (20 Bcf inventory),
5 Central Valley Storage Gas project (11 Bcf inventory) and the Sacramento
6 Natural Gas Storage project (8 Bcf inventory), which would add another 24
7 percent of storage inventory in northern California. The addition of more natural
8 gas storage capacity may lead to increased usage of backbone capacity to
9 facilitate storage injections. In the future, such usage may lead to a need to
10 modify the capacity utilization criteria to account for seasonal demands, rather
11 than annual average demands.

12 While these data show that PG&E has adequate backbone capacity in
13 aggregate, the Commission should recognize that there may be instances in
14 which an expansion of one of PG&E’s transportation paths will be beneficial to
15 PG&E’s customers, even when total backbone system flows are within the
16 guidelines established by the Commission. For example, PG&E’s shippers may
17 have an interest in the future to bring additional supplies into northern California
18 on PG&E’s Baja path. Should that occur, an expansion of PG&E’s Baja Path
19 from the south may be warranted, even at a time when PG&E’s total backbone
20 flows are within the 1-in-10-year guideline, in order to allow PG&E’s customers
21 to gain the benefit of access to new gas supplies.

22

1 **F. Adequacy of Local Transmission Capacity and Design Criteria**

2 All of PG&E’s local gas transmission systems are designed to provide
3 adequate capacity under all weather conditions including extreme cold weather
4 design criteria. The extreme cold weather design criteria are Cold Winter Day
5 (CWD) and Abnormal Peak Day (APD). PG&E is not proposing to make any
6 changes to these standards. The CWD design criterion ensures adequate
7 capacity to meet estimated non-core customer demands. The APD design
8 criterion ensures adequate capacity to meet estimated core customer demands.

9 The CWD design criterion is based on a very cold event, although not as
10 extreme as an APD. These criteria are used to ensure adequate capacity to
11 non-core customers. CWD has a recurrence interval of about 1-in-3 years.
12 Local areas have their own specific CWD temperature. Across the PG&E gas
13 system, the average daily mean CWD temperature is approximately 38 degrees
14 Fahrenheit. When analyzing each local transmission system for adequate
15 capacity, all core customers are assumed to be at their CWD load, while non-
16 core customers are assumed to be at a reasonable, sustainable maximum load.

17 The APD design criterion is based on an extremely cold weather event that
18 has a recurrence interval of 1-in-90 years. This corresponds to a 27 degree
19 Fahrenheit system-weighted mean temperature across the PG&E gas system.
20 Local planning areas have their own specific APD temperature. When analyzing
21 each local transmission system for adequate capacity, all non-core customers
22 are assumed to be curtailed.

23 When core supplies are insufficient to meet core demand, PG&E can divert
24 gas from noncore customers, including EG customers to meet core demand.
25 Diversion and Emergency Flow Order noncompliance charges are expected to
26 be sufficient to cause the noncore market to either reduce or cease its use of
27 gas. PG&E projects that in the near term, total noncore demand on an APD
28 would be 1.5 Bfc/d. With the recent expansions of the Wild Goose and Lodi gas
29 storage facilities and the addition of the Gill Ranch storage facility in 2010, more
30 noncore demand will be satisfied in the event of an APD.

31 Most PG&E gas transmission systems are constrained by the APD design
32 criterion and all of PG&E’s local transmission systems fully meet the APD and
33 CWD design criteria.

1 The APD core forecast is developed using the observed relationship
 2 between historical daily weather and core usage data. This relationship is then
 3 used to forecast the core load under APD conditions. A three year forecast of
 4 APD demands is shown in Table 3:

**TABLE 3
 PACIFIC GAS AND ELECTRIC COMPANY
 FORECAST OF CORE GAS DEMAND AND SUPPLY ON AN APD
 (MMcf/DAY)**

Line No.		2010-11	2011-12	2012-13
1	ADP Core Demand	3,092	3,100	3,108
2	Firm Storage Withdrawal	1,104	1,104	1,104
3	Required Flowing Supply	1,988	1,996	2,004
4	Total APD Resources (to meet demands)	3,092	3,100	3,108

Notes:

- (1) Includes PG&E's Gas Procurement Department's and other Core Aggregator's core customer demands. APD core demand forecast is calculated for 27 degrees Fahrenheit system composite temperature, corresponding to 1-in-90 year cold temperature event. PG&E now uses a system composite temperature based on six weather sites. This results in a 27 degree Fahrenheit APD temperature that is roughly equivalent to the 29 degree Fahrenheit APD temperature used previously.
- (2) Includes supplies flowing under firm and as-available capacity, and capacity made available pursuant to supply diversion arrangements.
- (3) Core Firm Storage Withdrawal capacity includes firm withdrawal capacity contracted with an on-system independent storage provider.

5 **G. Conclusion**

6 In accordance with the requirements set forth by Decision 06-09-039, PG&E
 7 has adequate backbone capacity to accommodate current and forecast demand
 8 on the PG&E system. While PG&E has adequate backbone capacity in
 9 aggregate, there may be instances in which an expansion of one of PG&E's
 10 transportation paths will be beneficial to some or all of PG&E's customers, even
 11 when total backbone system flows are within the guidelines established by the
 12 Commission. Lastly, as more storage capacity is developed in northern
 13 California, there may be a need to modify the capacity utilization guideline to
 14 account for seasonal, rather than annual, gas demands.

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

Aglet	Defense Energy Support Center	North Coast SolarResources
Alcantar & Kahl	Department of Water Resources	Occidental Energy Marketing, Inc.
Ameresco	Department of the Army	OnGrid Solar
Anderson & Poole	Dept of General Services	Praxair
Arizona Public Service Company	Division of Business Advisory Services	R. W. Beck & Associates
BART	Douglass & Liddell	RCS, Inc.
BP Energy Company	Downey & Brand	Recon Research
Barkovich & Yap, Inc.	Duke Energy	Recurrent Energy
Bartle Wells Associates	Dutcher, John	SCD Energy Solutions
Bloomberg New Energy Finance	Economic Sciences Corporation	SCE
Boston Properties	Ellison Schneider & Harris LLP	SMUD
Brookfield Renewable Power	Foster Farms	SPURR
C & H Sugar Co.	G. A. Krause & Assoc.	Santa Fe Jets
CA Bldg Industry Association	GLJ Publications	Seattle City Light
CAISO	Goodin, MacBride, Squeri, Schlotz & Ritchie	Sempra Utilities
CLECA Law Office	Green Power Institute	Sierra Pacific Power Company
CSC Energy Services	Hanna & Morton	Silicon Valley Power
California Cotton Ginners & Growers Assn	International Power Technology	Silo Energy LLC
California Energy Commission	Intestate Gas Services, Inc.	Southern California Edison Company
California League of Food Processors	Lawrence Berkeley National Lab	Sunshine Design
California Public Utilities Commission	Los Angeles Dept of Water & Power	Sutherland, Asbill & Brennan
Calpine	Luce, Forward, Hamilton & Scripps LLP	Tabors Caramanis & Associates
Cameron McKenna	MAC Lighting Consulting	Tecogen, Inc.
Casner, Steve	MBMC, Inc.	Tiger Natural Gas, Inc.
Chris, King	MRW & Associates	Tioga Energy
City of Glendale	Manatt Phelps Phillips	TransCanada
City of Palo Alto	McKenzie & Associates	Turlock Irrigation District
Clean Energy Fuels	Merced Irrigation District	U S Borax, Inc.
Coast Economic Consulting	Mirant	United Cogen
Commerce Energy	Modesto Irrigation District	Utility Cost Management
Commercial Energy	Morgan Stanley	Utility Specialists
Consumer Federation of California	Morrison & Foerster	Verizon
Crossborder Energy	NRG West	Wellhead Electric Company
Davis Wright Tremaine LLP	New United Motor Mfg., Inc.	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy	Norris & Wong Associates	eMeter Corporation
	North America Power Partners	