

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 16, 2016

Erik Jacobson  
Director, Regulatory Relations  
c/o Megan Lawson  
Pacific Gas and Electric Company  
Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

Sent via e-mail  
[PGETariffs@pge.com](mailto:PGETariffs@pge.com)

**Subject:** Rejection of Pacific Gas and Electric Company Advice Letter 3671-G *Modifications to Gas Schedules G-EG and G-SUR Related to Electrical Generation Facilities that Meet Electrical Efficiency Requirements Equivalent to Cogeneration Efficiency Requirements Present in Public Utilities Code Section 216.6.*

Dear Mr. Jacobson:

The Energy Division of the California Public Utilities Commission hereby rejects Pacific Gas and Electric Company (PG&E) Advice Letter (AL) 3671-G for the reasons set forth herein.

### Background

In AL 3671-G, PG&E is seeking to revise its gas tariff to allow nonutility electric generation technologies that meet the same electrical efficiency standards as cogeneration technologies to be served under schedule G-EG - *Gas Transportation Service to Electric Generation* and be exempt from the charges in schedule G-SUR - *Customer-Procured Gas Transportation Franchise Fee Surcharge*. If approved, nonutility electric generation technologies meeting the same efficiency requirements would be paying the same rate as cogeneration technologies under schedule G-EG and be exempt from certain charges they would otherwise pay under schedule G-SUR.

Cogeneration technologies were placed on schedule G-EG and exempt from schedule G-SUR charges pursuant to Public Utilities Code (PU) Section 454.4 provided the electrical efficiency standards specified in PU Code Section 216.6 are attained.<sup>1,2</sup> As justification for its AL 3671-G proposal, PG&E explained that, since the passage of PU Code Section 216.6 in 1986, other nonutility electric generation technologies have been developed which meet or exceed the electrical efficiency standards mandated for cogeneration technologies and, therefore, should be accorded similar service under rate schedules G-EG and G-SUR.

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<sup>1</sup> PU Code Section 454.4 specifies that, "The Commission shall establish rates for gas which is utilized in cogeneration technology projects not higher than the rates established for gas utilized as a fuel by an electric plant in the generation of electricity, ..."

<sup>2</sup> PU Section 216.6 defines cogeneration as the "... the sequential use of energy for the production of electrical and thermal energy ... subject to the following standards: (a) At least 5 percent of the facility's total annual energy output shall be in the form of useful thermal energy. (b) Where useful thermal energy follows power production, the useful annual power output plus one-half the useful annual thermal energy output equals not less than 42.5 percent of any natural gas and oil energy input."

Mr. Erik Jacobson  
March 16, 2016  
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### Discussion

Energy Division finds that PG&E AL 3671-G fails to comply with Rule 5.1 of General Order (GO) 96-B. That rule states the following, in part:

“The advice letter process provides a quick and simplified review of the types of utility requests that are expected neither to be controversial nor to raise important policy questions ...

The primary use of the advice letter process is to review a utility’s request to change its tariff in a manner previously authorized by statute or Commission order, to conform the tariffs to the requirements of a statute or Commission order, or to get Commission authorization to deviate from its tariffs.”

PG&E’s AL 3671-G proposal represents a significant change to the application of schedules G-EG and G-SUR that would result in additional nonutility electric generation technologies receiving the same rate treatment as cogeneration technologies. It raises important policy questions such as how the preferential rate treatment could impact the deployment of other electric generation technologies including electricity from non-natural gas renewable sources and whether the tariff changes result in other customers subsidizing the costs that would be incurred by the utility to serve nonutility electric generation technologies. As GO 96-B Rule 5.1 provides, an advice letter is not the appropriate method to use for the Commission to consider those types of issues. Furthermore, PG&E did not cite any statute or Commission order in AL 3671-G authorizing the utility to revise its gas tariff in the manner requested, as GO 96-B Rule 5.1 requires.

Based on the foregoing reasons, Energy Division hereby rejects PG&E AL 3671-G.<sup>3</sup>

Sincerely,



Edward Randolph  
Director, Energy Division

cc: Kingsley Cheng, PG&E  
[k2c0@pge.com](mailto:k2c0@pge.com)

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<sup>3</sup> PG&E noted that a similar request by the utility to modify Schedule G-EG and Schedule G-SUR was filed in AL 3591-G. That AL was rejected by ED on July 31, 2015. (PG&E AL 3761-G at p. 2)



**Erik Jacobson**  
Director  
Regulatory Relations

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San Francisco, CA 94177

Fax: 415-973-7226

January 8, 2016

**Advice 3671-G**

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

**Subject: Modifications to Gas Schedules G-EG and G-SUR Related to Electrical Generation Facilities that Meet Electrical Efficiency Requirements Equivalent to Cogeneration Efficiency Requirements Present in Public Utilities Code (PU Code) Section 216.6**

Pacific Gas and Electric Company (PG&E) hereby submits for filing revisions to its gas tariffs. The affected tariff sheets are listed on the enclosed Attachment 1.

**Purpose**

The purpose of this advice filing is to update PG&E's Gas Schedule G-EG – *Gas Transportation Service to Electric Generation* and Schedule G-SUR – *Customer-Procured Gas Franchise Fee Surcharge* to allow other nonutility electric generation technologies that meet an overall electrical efficiency equivalent to the efficiency requirements for cogeneration technologies to be eligible for service under these schedules.

**Background**

PU Code Section 454.4 requires the California Public Utilities Commission (Commission or CPUC) to establish rates for gas used in cogeneration technology projects that are not higher than the rates established for gas utilized as a fuel by an electric plant for the generation of electricity. Cogeneration is defined in PU Code Section 216.6 as, "The sequential use of energy for the production of electrical and useful thermal energy. The sequence can be thermal use followed by power production or the reverse, subject to the following standards:

- (a) At least 5 percent of the facility's total annual energy output shall be in the form of useful thermal energy.

- (b) Where useful thermal energy follows power production, the useful annual power output plus one-half the useful annual thermal energy output equals not less than 42.5 percent of any natural gas and oil energy input.”

Since the implementation of PU Code Section 216.6 in 1986, additional electric generation technologies have been developed that can meet and surpass the equivalent electrical efficiency requirements as called for in PU Code Section 216.6. While some of these electrical generation technologies do not directly mirror traditional cogeneration by definition, their overall electricity efficiency, in some cases, meets and surpasses the 45% efficiency equivalence specified in Code of Federal Regulation (CFR) 292.205. CFR 292.205 Subsection B specifies that if the useful thermal energy used by certain bottoming-cycle facilities is less than 15%, then the overall efficiency of the facility must be at least 45% to be considered a qualifying facility.

PG&E now requests Commission authorization to modify Schedule G-EG and Schedule G-SUR to allow electric generation facilities that meet either cogeneration efficiency requirements or overall electric efficiency requirements of more than 45% overall efficiency to be eligible for service under the aforementioned Schedules. Last year, PG&E filed a similar request in AL 3591-G on April 29, 2015 to modify Schedule G-EG and Schedule G-SUR, which was rejected by Energy Division Disposition on July 31, 2015.

### **Tariff Revisions**

In order to implement this proposal, PG&E will make the following revisions to its tariffs:

The Applicability section of Gas Schedule G-EG is revised to include in Section (b): all Cogeneration facilities that meet the efficiency requirements specified in the California Public Utilities Code Section 216.6\*\* *and other electric generation facilities that meet an overall electric efficiency of at least 45%.*

Gas Schedule G-SUR is revised to include Cogeneration customers *and other electrical generation facilities that meet an overall electric efficiency of at least 45%*, for that quantity of gas billed under Schedule G-EG.

The filing would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

### **Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than January 28, 2016, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: EDTariffUnit@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 shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson  
Director, Regulatory Relations  
c/o Megan Lawson  
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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

### **Effective Date**

PG&E requests that this Tier 2 advice filing be approved with an effective date of January 1, 2016.

### **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 parties on the service list for R.12-11-005. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to



# 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 G)**

Utility type:

ELC       GAS  
 PLC       HEAT       WATER

Contact Person: Kingsley Cheng

Phone #: (415) 973-5265

E-mail: k2c0@pge.com and PGETariffs@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) #: **3671-G**

Tier: **2**

Subject of AL: **Modifications to Gas Schedules G-EG and G-SUR Related to Electrical Generation Facilities that Meet Electrical Efficiency Requirements Equivalent to Cogeneration Efficiency Requirements Present in Public Utilities Code (PU Code) Section 216.6**

Keywords (choose from CPUC listing): Cogeneration

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 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: **January 1, 2016**

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 Schedule G-EG and Gas Schedule G-SUR**

Service affected and changes proposed: 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:

**California Public Utilities Commission**  
**Energy Division**  
**EDTariffUnit**  
**505 Van Ness Ave., 4<sup>th</sup> Flr.**  
**San Francisco, CA 94102**  
**E-mail: EDTariffUnit@cpuc.ca.gov**

**Pacific Gas and Electric Company**  
**Attn: Erik Jacobson**  
**Director, Regulatory Relations**  
**c/o Megan Lawson**  
**77 Beale Street, Mail Code B10C**  
**P.O. Box 770000**  
**San Francisco, CA 94177**  
**E-mail: PGETariffs@pge.com**

**ATTACHMENT 1  
Advice Fuel-Cell**

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

**Title of Sheet**

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

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32482-G	GAS SCHEDULE G-EG GAS TRANSPORTATION SERVICE TO ELECTRIC GENERATION Sheet 1	32424-G
32483-G	GAS SCHEDULE G-SUR CUSTOMER-PROCURED GAS FRANCHISE FEE SURCHARGE Sheet 1	32433-G
32484-G	GAS TABLE OF CONTENTS Sheet 1	32472-G
32485-G	GAS TABLE OF CONTENTS Sheet 2	32430-G
32486-G	GAS TABLE OF CONTENTS Sheet 3	32431-G





**GAS SCHEDULE G-EG**  
**GAS TRANSPORTATION SERVICE TO ELECTRIC GENERATION**

Sheet 1

**APPLICABILITY:** This rate schedule\* applies to the transportation of natural gas used in: (a) electric generation plants served directly from PG&E gas facilities that have a maximum operation pressure greater than sixty pounds per square inch (60 psi); (b) all Cogeneration facilities that meet the efficiency requirements specified in the California Public Utilities Code Section 216.6\*\* and other electric generation facilities that meet an overall electric efficiency of at least 45%; (c) solar electric generation plants, defined herein and (d) Advanced Electrical Distributed Generation technology that meets all of the conditions specified in Public Utilities Code Section 379.8, as defined in Rule 1, and are first operational at a site prior to January 1, 2016. This schedule does not apply to gas transported to non-electric generation loads. (N) (N)

Customers on Schedule G-EG permanently classified as Noncore End-Use Customers, per Rule 1 must procure gas supply from a third-party gas supplier, not from a Core Procurement Group, as defined in Rule 1.

Certain noncore customers served under this rate schedule may be restricted from converting to a core rate schedule. See Rule 12 for details on core and noncore reclassification.

**TERRITORY:** Schedule G-EG applies everywhere within PG&E's natural gas Service Territory.

**RATES:** The following charges apply to this schedule. They do not include charges for service on PG&E's Backbone Transmission System:

1. Customer Access Charge:

The applicable Per-Day Customer Access Charge specified below is based on the Customer's Average Monthly Use, as defined in Rule 1. Usage through multiple noncore meters on a single premises will be combined to determine Average Monthly Usage. Customers taking service under this schedule who also receive service under other noncore rate schedules at the same premises will be charged a single Customer Access Charge under this schedule.

Average Monthly Use (Therms)	Per Day
0 to 5,000 therms	\$2.04230
5,001 to 10,000 therms	\$6.08351
10,001 to 50,000 therms	\$11.32274
50,001 to 200,000 therms	\$14.85962
200,001 to 1,000,000 therms	\$21.56022
1,000,001 and above therms	\$182.88493

2. Transportation Charge:

Customers will pay one of the following rates for gas delivered in the current billing period:

a. The Backbone Level Rate applies to Backbone Level End-Use Customers as defined in Rule 1.

Backbone Level Rate: \$0.01223 per therm

b. All Other Customers: \$0.03547 per therm

\* PG&E's gas tariffs are available on-line at [www.pge.com](http://www.pge.com).

\*\* Efficiency Standard: In accordance with PU Code Section 216.6, at least 5 percent of the facility's total output must be in the form of useful thermal energy. Where useful thermal energy follows power production, the useful annual power output plus one-half the useful annual thermal energy output must equal no less than 42.5 percent of any natural gas and oil energy input.

Note: Customers who are directly billed by Air Resources Board (ARB) for ARB AB32 Administration Fees are exempt from PG&E's ARB AB32 Cost of Implementation (COI) rate component. Customers on the Directly Billed list, as provided annually by the ARB, may change from year to year. The exemption credit will be equal to PG&E's currently-effective ARB AB32 COI per-therm rate component (as shown in PG&E's Preliminary Statement, Part B - "Default Tariff Rate Components"), times the customer's billed volumes (therms) for each billing period.

(Continued)



**GAS SCHEDULE G-SUR**  
**CUSTOMER-PROCURED GAS FRANCHISE FEE SURCHARGE**

Sheet 1

**APPLICABILITY:** Pursuant to California State Senate Bill No. 278 (1993) and pursuant to PU Code sections 6350-6354, this schedule applies to all gas volumes procured by Customers from third-party entities and transported by PG&E ("Customer-procured gas") with the following exceptions:

- a. The state of California or a political subdivision thereof;
- b. One gas utility transporting gas for end use in its Commission-designated service area through another utility's service area;
- c. A utility transporting its own gas through its own gas transmission and distribution system for purposes of generating electricity or for use in its own operations;
- d. Cogeneration Customers, and other electric generation facilities that meet an overall electric efficiency of at least 45%, for that quantity of natural gas billed under Schedule G-EG; and (N)  
(N)
- e. Advanced Electrical Distributed Generation Technology that meets all of the conditions specified in Public Utilities Code Section 379.8 that is first operational at a site prior to January 1, 2016.

**TERRITORY:** Schedule G-SUR applies everywhere PG&E provides natural gas service.

**RATES:** The Customer-procured gas Franchise Fee Surcharge is comprised of the following components:

a.	The monthly core Weighted Average Cost of Gas (WACOG), exclusive of storage costs and Franchise Fees and Uncollectibles, which is .....	<u>Per Therm</u> \$0.18389
	multiplied by:	
b.	The Franchise Fee factor* adopted in PG&E's most recent General Rate Case, which is .....	0.014071
	The G-SUR Franchise Fee Surcharge is .....	\$0.00259

**SURCHARGE RECOVERY:** The surcharge will be shown on the Customer's monthly bill based on volumes procured by the Customer from a third party and transported by PG&E (metered usage).

**DELINQUENT SURCHARGES:** In the event that payment on a transportation Customer's closed account becomes more than 90 days delinquent or a transportation Customer notifies the utility that they refuse to pay the surcharge, PG&E shall, within 30 days, notify the municipality of the delinquency and provide information on the name and address of the delinquent transportation Customer and the surcharge amount owed. PG&E shall not be liable for delinquent surcharges.

\* Does not include Uncollectibles factor of 0.003406.



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Advice Letter No: 3671-G  
 Decision No.

Issued by  
**Steven Malnight**  
 Senior Vice President  
 Regulatory Affairs

Date Filed January 8, 2016  
 Effective \_\_\_\_\_  
 Resolution No. \_\_\_\_\_



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

AT&T	Division of Ratepayer Advocates	OnGrid Solar
Albion Power Company	Don Pickett & Associates, Inc.	Pacific Gas and Electric Company
Alcantar & Kahl LLP	Douglass & Liddell	Praxair
Anderson & Poole	Downey & Brand	Regulatory & Cogeneration Service, Inc.
Atlas ReFuel	Ellison Schneider & Harris LLP	SCD Energy Solutions
BART	G. A. Krause & Assoc.	SCE
Barkovich & Yap, Inc.	GenOn Energy Inc.	SDG&E and SoCalGas
Bartle Wells Associates	GenOn Energy, Inc.	SPURR
Braun Blaising McLaughlin & Smith, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Water Power and Sewer
Braun Blaising McLaughlin, P.C.	Green Power Institute	Seattle City Light
CPUC	Hanna & Morton	Sempra Energy (Socal Gas)
California Cotton Ginners & Growers Assn	International Power Technology	Sempra Utilities
California Energy Commission	Intestate Gas Services, Inc.	SoCalGas
California Public Utilities Commission	Kelly Group	Southern California Edison Company
California State Association of Counties	Ken Bohn Consulting	Spark Energy
Calpine	Leviton Manufacturing Co., Inc.	Sun Light & Power
Casner, Steve	Linde	Sunshine Design
Cenergy Power	Los Angeles County Integrated Waste Management Task Force	Tecogen, Inc.
Center for Biological Diversity	Los Angeles Dept of Water & Power	Tiger Natural Gas, Inc.
City of Palo Alto	MRW & Associates	TransCanada
City of San Jose	Manatt Phelps Phillips	Troutman Sanders LLP
Clean Power	Marin Energy Authority	Utility Cost Management
Coast Economic Consulting	McKenna Long & Aldridge LLP	Utility Power Solutions
Commercial Energy	McKenzie & Associates	Utility Specialists
Cool Earth Solar, Inc.	Modesto Irrigation District	Verizon
County of Tehama - Department of Public Works	Morgan Stanley	Water and Energy Consulting
Crossborder Energy	NLine Energy, Inc.	Wellhead Electric Company
Davis Wright Tremaine LLP	NRG Solar	Western Manufactured Housing Communities Association (WMA)
Day Carter Murphy	Nexant, Inc.	YEP Energy
Defense Energy Support Center	ORA	
Dept of General Services	Office of Ratepayer Advocates	