

PUBLIC UTILITIES COMMISSION

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December 12, 2007

Advice Letter 3106-E

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: Update to PG&E's Assembly Bill 57 Procurement
Plan to Clarify the Upfront Achievable Standards
and Criteria for the Procurement of Congestion
Revenue Rights

Dear Mr. Cherry:

Advice Letter 3106-E is effective December 6, 2007.

Sincerely,

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

Sean H. Gallagher, Director
Energy Division



Brian K. Cherry
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August 20, 2007

Advice 3106-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Update to PG&E's Assembly Bill 57 Procurement Plan to Clarify the Upfront Achievable Standards and Criteria for the Procurement of Congestion Revenue Rights

Purpose

By this advice letter, Pacific Gas and Electric Company ("PG&E") requests expedited approval of an update to its Commission-approved Assembly Bill ("AB") 57 Procurement Plan ("PP")¹ and its pending 2006 Long-Term Procurement Plan ("LTPP") in order to establish upfront and achievable standards and criteria applicable in procuring Congestion Revenue Rights ("CRRs"), including Long-Term CRRs ("LT-CRRs"), through the California Independent System Operator Corporation's ("CAISO") CRR allocation and auction processes. PG&E recently filed Advice Letter 3095-E, which requested Commission authorization for PG&E to participate in the CAISO's LT-CRR allocation process. This advice letter seeks Commission approval of the upfront standards and criteria for procuring all CRRs, including LT-CRRs.

Background

As part of the CAISO's Market Redesign and Technology Upgrade ("MRTU"), the current transmission rights mechanism, known as Firm Transmission Rights ("FTRs"), will be replaced by CRRs. The attributes of CRRs and the process for

¹ PG&E filed its 2004 Short-Term Procurement Plan ("2004 STPP") on May 15, 2003, and it was approved by the Commission in D.03-12-062. PG&E's 2004 STPP has been updated via the Commission-approved Advice Letter 2464-E (submitted January 20, 2004, to update certain tables in PG&E's 2004 STPP and provide a list identifying the brokerages and exchanges). In D.04-12-048, the Commission approved PG&E's 2004 Long-Term Procurement Plan. Subsequently, pursuant to D.04-12-048, PG&E filed an updated STPP via Advice Letter 2615-E, which was approved by the Commission and made effective January 28, 2005. The collective set of PG&E's 2004 STPP, including subsequent modifications and updates, and PG&E's 2004 LTPP constitute PG&E's current AB 57 Procurement Plan. PG&E's 2006 LTPP is currently pending in Rulemaking ("R.") 06-02-013.

making such rights available to market participants differ from the FTR process. Some of these differences warrant an update to PG&E's PP and 2006 LTPP in order to provide upfront and achievable standards and criteria that are more applicable to CRR and LT-CRR transactions.

In order to understand why this update is needed, it is first important to understand how CRRs will differ from FTRs and how the process for obtaining the rights is different. An FTR is a right with both physical and financial attributes. An FTR has a physical attribute in that it conveys a scheduling priority in the CAISO day-ahead scheduling process for a certain direction on a transmission path if adjustment bids are unavailable to alleviate the congestion (e.g., South to North on Path 15). Additionally, the FTR provides a financial hedge against congestion costs. This hedge is an "option" hedge, meaning that it pays the holder based on the congestion costs along the FTR path, but does not charge the holder if the congestion reverses direction. FTRs are specified on a path and direction basis. That is, the holder has rights to congestion revenues on a transmission branch group for congestion in a particular direction. FTRs are procured through an auction conducted by the CAISO on an annual basis. The FTRs that are acquired are valid in all hours of the term as defined by the CAISO. Additionally, parties may trade FTRs bilaterally and register the change in ownership through the CAISO's Secondary Registration System ("SRS").

CRRs, on the other hand, are financial instruments only and do not convey any scheduling priority. Instead, the CAISO will dispatch resources based upon a Security Constrained Economic Dispatch algorithm. That is, the CAISO will dispatch resources in a least-cost manner subject to transmission system constraints. Since MRTU utilizes a network model, CRRs are designated on a source-to-sink basis. Unlike FTRs, they are not branch group specific. Rather, any network source-sink pair (a point of injection and point of withdrawal of electricity on the grid) can become a CRR. For this reason, there are many more potential CRRs as compared to FTRs to consider when selecting CRRs for PG&E's customers. Another important difference is that CRRs are a financial "obligation." This means that the CAISO will pay the holder if congestion is in the same direction (*i.e.*, from the source to the sink) as the CRR that is held. However, if congestion occurs in the opposite direction (*i.e.*, from the sink to the source), the CRR holder is obligated to pay the congestion value to the CAISO.

The CAISO will be using CRRs as part of its implementation of MRTU. CRRs will initially be allocated to Load Serving Entities ("LSEs") based upon their historical load and a demonstration of resources owned or under contract for which the CRR will serve as a hedge.² The allocation of CRRs is followed by an auction process

² Pursuant to the CAISO tariff, the demonstration of a need based upon having a generation resource is applicable to two out of three tiers in the annual allocation process and one out of two tiers in the monthly allocation process in the first year. Subsequent years currently have no source verification process.

similar to the auction process utilized for FTRs. The CRR auction is open to any entity meeting the CAISO tariff requirements.³ The auction and allocation process will occur annually and monthly. The annual CRR allocation process includes a step that allows LSEs to convert a portion of their awarded annual rights into LT-CRRs which have a term of ten years. Finally, CRRs may be transacted bilaterally, and the ownership change must be registered in the CAISO's SRS similar to FTRs.

Update Request

In light of the fact that CRRs have different attributes and procurement processes than FTRs, PG&E requests that the Commission adopt the following upfront and achievable standards and criteria related to the procurement of CRRs which will enhance PG&E's PP and 2006 LTPP on a going-forward basis.

1. CRR Source-Sink Pairs Or "Paths"

- a. PG&E's current PP imposes no restrictions on the source-sink pairs or paths on which PG&E might obtain transmission service or FTRs. In practice, PG&E has sought transmission service or FTRs on inter-state or inter-zonal transmission paths, or on paths that PG&E reasonably anticipates that it might need to flow energy in the future due to the addition of new contracts, resources or load obligations. If PG&E is able to obtain transmission service or an FTR at an attractive price, for example, PG&E can later sign an energy contract at the market price that uses that transmission service or FTR to bring energy to PG&E's customers at an attractive, all-in delivered price. FTRs have helped PG&E manage its overall energy portfolio. Their availability and future expected availability influences ongoing energy purchases. If PG&E were prohibited from obtaining the transmission service or FTR first, due to the absence of an existing energy contract or source, then opportunities to obtain attractively priced energy going forward might be lost. Stated another way, PG&E currently has the flexibility to obtain either energy or transmission service or a transmission hedge (such as an FTR) first, depending on the opportunities that are available in the market.
- b. PG&E believes it should have similar flexibility to obtain CRRs. Specifically, PG&E proposes that it be allowed to obtain CRRs for any path (represented by a source-sink pair) connecting existing generation sources to existing loads (either retail loads or wholesale

³ These tariff requirements include, among other things, credit requirements, training requirements, and an application to become a CRR holder.

load obligations)⁴ or for any path that PG&E reasonably anticipates that it might need to flow energy in the future due to the addition of new contracts, resources or load obligations.⁵ Additionally, there may be CRRs which are positively correlated in value with CRRs for paths that have limited availability. PG&E proposes that it be allowed to obtain CRRs for such positively correlated paths as well. It might be desirable for PG&E to obtain CRRs on positively correlated paths if limited CRRs are available for the target path or if the CRRs for the positively correlated path can be obtained at lower prices.

2. Maximum Volume Limits

- a. Currently, PG&E has no maximum (or minimum) volume limits for procurement of transmission service or FTRs.
- b. Overall or total CRR volume limits are unnecessary for the CAISO's allocation process. This is because the CAISO tariff establishes volume limits for PG&E as an LSE based on PG&E's adjusted load metric.⁶ Specifically, PG&E cannot obtain CRRs exceeding 75% of its adjusted load metric in the annual CRR allocation process, and more than 100% cumulatively of its adjusted load metric through the monthly CRR allocation process. Similarly, PG&E cannot obtain LT-CRRs exceeding 50% of its adjusted load metric in the long-term allocation process.
- c. Therefore, PG&E proposes that the Commission does not establish total or overall limits for PG&E's procurement of CRRs, including LT-CRRs. Instead, PG&E proposes source-specific volume limits. That

⁴ For the initial year of MRTU, all CRRs allocated to an LSE in all but the last "tier" of the annual or monthly CAISO allocation process must be "source-verified," based on a review of actual LSE sources used in 2006. Additionally, the sink for all CRRs allocated to an LSE must be the LSE's Load Aggregation Point ("LAP"), except in the final tier, in which case the sink can be one of the LSE's sub-LAPs.

⁵ Technically, under MRTU, market participants do not necessarily schedule energy to flow between two points on the transmission grid. When PG&E refers to the flow of energy on a path under MRTU in this Advice Letter, it is referring to the existence of a generation source at one termination of the path and a load (or load obligation) at the other termination. Typically, there is not a direct, physical connection between the energy source and sink. Rather, the energy source and sink are points on the transmission network and the actual flow of electricity is determined by the configuration of the network and the operation of other interconnected resources and loads.

⁶ Adjusted Load Metric is defined by the CAISO as the level of demand that is exceeded in only 0.5% of the hours for the prior year less any Existing Transmissions Contract, Converted Rights, and Transmission Ownership Rights.

is, PG&E proposes limiting the “net” volume⁷ that it could procure at each source node to the maximum non-coincident capacity of the sources (existing, potential, planned, or “positively correlated”⁸) at that node. PG&E proposes separate monthly limits for the on-peak and off-peak hours of the month.

3. PRG Consultation

- a. Prior to executing transactions longer than one calendar quarter in delivery duration, PG&E is required by its PP to consult with its Procurement Review Group (“PRG”). As a result of this requirement, PG&E has reviewed with its PRG its proposed bidding strategy for each annual FTR auction in advance of the auction, including discussing the maximum total volume of FTRs that PG&E might acquire.
- b. PG&E will continue to consult with its PRG prior to transacting for any CRR having a term greater than one calendar quarter.
- c. CRRs awarded in the annual CAISO allocation/auction process only have a term of one calendar quarter. However, notwithstanding the quarterly term, PG&E will consult with the PRG prior to making CRR nominations for any of the tiers in the annual allocation process, or prior to converting awarded CRRs to LT-CRRs. PG&E will also consult with its PRG prior to participating in the annual CRR auction.
- d. PG&E does not intend to consult with the PRG prior to each monthly CRR allocation/auction process. However, PG&E will review its CRR position with the PRG in its periodic position update discussions.

4. Valuation and Risk Analysis

- a. Prior to participating in the annual and monthly CRR allocation/auction process, PG&E will identify candidate CRRs for consideration based on the location and magnitude of its resources and loads (existing and potential), and may also identify additional candidate CRRs that are potentially positively correlated in value with other CRRs of interest.
- b. For the overall portfolio and for each of the candidate CRRs, PG&E will estimate the expected value for the relevant time period by using various methods, such as:

⁷ By “net” volume, PG&E is referring to the result of netting CRRs in one direction with CRRs in the counter-flow direction.

⁸ See Paragraph 1.b above for the meaning of the term “correlated.”

- i. Running a model of the transmission network simulating the dispatch of generation to serve load and forecasting Marginal Congestion Costs (“MCCs”) or Locational Marginal Prices (“LMPs”) at CAISO nodes and hubs;
- ii. Obtaining a forecast of MCCs or LMPs from one or more expert consulting firms;
- iii. Obtaining market price quotations (where available) at trading hubs;
- iv. Analyzing historical MCC and LMP data for trends, relationships, and correlations and using this data and observed trends and relationships to forecast future MCCs or LMPs; or,
- v. Averaging (or weight-averaging) forecasts of MCCs and LMPs that were developed using two or more of the methodologies described above.

These methods for calculating expected value should not be considered exhaustive, nor will all of these methods necessarily be used, and PG&E expects to make further enhancements over time to its ability to estimate value. The methodologies used for valuation will be reviewed with the PRG during the consultations proposed above.

- c. Similarly, prior to participating in the annual and monthly CRR allocation/auction process, or prior to converting awarded CRRs to LT-CRRs, PG&E proposes to evaluate the risks of obtaining CRRs or not obtaining CRRs for the candidate CRR paths. Risk can be created by a number of factors, including: a large congestion cost differential between a PG&E source and sink;⁹ variability in the dollar amounts paid or received by holding a CRR; potential generation or transmission outages; higher or lower loads than normal; and future changes to the transmission grid, including the interconnection of new generation. One of the risks of not having a CRR is that PG&E may pay a high congestion cost to flow energy from its source to its sink. Having a CRR provides an offsetting payment to compensate PG&E for having to pay that congestion cost. In contrast, one of the risks of having a CRR is that PG&E may have to pay a high

⁹ Such congestion can vary in magnitude considerably over time, can occur in both directions at different times, and is unbounded in MRTU. Congestion is created when the energy delivered to a node exceeds the capacity of the transmission network to flow energy from that point.

congestion cost if congestion counter-flows to the direction of that CRR.¹⁰ For a particular path, PG&E's risk is also impacted by the character of its resource(s) using that path. That is, risk is potentially much higher if the resource is must-take and non-dispatchable, meaning that PG&E must take delivery of energy regardless of the congestion cost from the source to the sink. Another risk PG&E may face is the impact of having to post high amounts of collateral to CAISO to secure its CRR holdings in a stress case scenario. PG&E may employ several different metrics to quantify its risk assessment, including, but not limited, to:

- i. Simulating random variables, such as load, hydro, gas prices, and outages, creating a distribution of congestion costs or CRR values for a period of time, and calculating metrics based on that distribution;
- ii. Creating a marginal cost of congestion duration curve indicating the number of hours (or percent of the time) that congestion exceeds a particular value and calculating metrics based on that duration curve;
- iii. Creating a distribution of the hourly dollar amounts received or paid for holding a CRR and calculating metrics based on that distribution (such as TeVaR at the 99th percentile);¹¹
- iv. Running various scenarios (or stress cases), such as for high or low loads, high or low gas prices, high or low generation/transmission outages, determining the expected congestion cost or CRR value for these scenarios over a period of time, and calculating the change in cost/value compared to the base case scenario;
- v. Forecasting how congestion costs paid might vary depending on whether the resource at the CRR source location is must-take or dispatchable;
- vi. Estimating the risk mitigation achieved by the addition of candidate CRRs to the overall portfolio; or,

¹⁰ This payment may be offset by PG&E receiving a payment for flowing energy from its source to its sink counter-flow to the direction of congestion. However, if PG&E's source is not available (for example, due to an outage), PG&E would not receive a payment for counter-flowing energy.

¹¹ To-expiration-Value-at-Risk ("TeVaR") at the 99th percentile is the difference between the value that is not exceeded 99% of the time and the average or expected value.

- vii. Forecasting the potential amounts paid for holding a CRR during periods of counter-flow.
- d. PG&E will review its CRR valuation and risk analysis with its PRG (prospectively for the annual CRR auction/allocation process). Because MRTU is new to California and there is no history on CRRs, MCCs, or LMPs, and because (in PG&E's experience) models, assumptions, methodologies, and technologies continue to improve over time, PG&E does not recommend that the Commission mandate that PG&E use any particular method or model to value or assess the risk of congestion or CRRs.

5. Nomination Criteria in CRR Allocation Process

- a. In nominating CRRs in the CAISO's allocation process, and when converting awarded CRRs to LT-CRRs, PG&E may consider a number of factors, including, but not limited to:
 - i. The expected cost of congestion (and value of the CRR);
 - ii. Various risk metrics (discussed above) for obtaining or not obtaining a candidate CRR;
 - iii. The probability that a portion of requested CRR volumes might or might not be awarded due to competing requests for the same CRR; and,¹²
 - iv. The likelihood and potential cost (or opportunity cost) for PG&E to obtain the candidate CRR in a subsequent tier, the auction, the monthly CRR allocation/auction process, or the secondary market.

6. PG&E's Participation In The CRR Auction And Conversion Of CRRs To LT-CRRs

- a. Because the CRR auction is competitive and likely will involve a number of market participants, PG&E anticipates that the resulting auction prices will fairly reflect the value of CRRs obtained. Accordingly, PG&E requests that the Commission approve PG&E's participation in the CRR auction process and establish that all PG&E auction awards are in compliance with upfront standards and

¹² If PG&E is not able to obtain certain MWs of CRRs in the allocation process due to oversubscription (non-feasibility of simultaneous award), PG&E has lost the ability to obtain those MWs in that tier. PG&E may seek to replace these MWs with other CRRs in lower priority tiers.

therefore are *per se* reasonable. The CPUC has previously approved PG&E's participation in existing CAISO markets, including the FTR market, and has established that PG&E's transactions in these markets done in compliance with upfront standards are *per se* reasonable.

- b. The annual CRR allocation process includes a step that allows LSEs to convert a portion of their awarded annual rights into LT-CRRs which have a term of ten years. In Advice Letter 3095-E, filed July 31, 2007, PG&E has separately requested Commission authority to participate in the LT-CRR conversion and allocation process. This request was necessary because LT-CRRs have a term of 10-years. Under PG&E's current PP, it is required to seek pre-approval for transactions with a term longer than five years. PG&E requests that in approving this advice letter, the Commission authorize PG&E to convert CRRs to LT-CRRs as a part of the CRR allocation and auction process. PG&E should be able to use its judgment as to which CRRs to convert to LT-CRRs and will review these decisions with its PRG.

7. Transactions In Secondary CRR Market

- a. The CRR product is similar to a locational spread, which PG&E is currently authorized to transact under its PP. In a locational spread, PG&E sells energy at one point of the grid and buys energy at another point of the grid. The financial result is the same as if PG&E were to pay to flow energy from the point of the energy sale to the point of the energy purchase.
- b. Because of the similarity between CRRs and energy transactions, such as locational spreads, PG&E will use the same transaction processes that its PP authorizes PG&E to use for energy transactions – *e.g.*, transact using brokers or exchanges¹³, bilaterally subject to providing a “strong showing” in the Quarterly PP Compliance filing, through an RFO (if feasible), etc. Among valid, competing offers for the same CRR, PG&E will select based on the better price (all else being equal). Particular locational spreads may also be purchased if related CRRs are not available.
- c. PG&E will pursue both sales and purchases in the CRR secondary market.

¹³ PG&E does not anticipate that there will be any exchanges offering CRRs in the secondary market initially or for some time after MRTU start-up.

- d. PG&E anticipates that there will not be much liquidity (market volume), outside of the CAISO auction, in CRRs at least initially and probably for some considerable time.

Tier Designation

Pursuant to D.07-01-024, Rule 5.3, this advice letter is submitted with a Tier 3 designation.

Protests

PG&E requests an expedited protest period and review period pursuant to General Order 96-B, Section 1.3. 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 **August 29, 2007** with replies to protests due **August 31, 2007**.

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
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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 And Expedited Consideration

PG&E requests that this advice filing become effective on **September 6, 2007**. In accordance with Public Utilities Code § 311(g)(2), PG&E asks for the Commission to reduce/waive the 30 day review period of the draft resolution in order to have this expeditiously approved by September 6, 2007 so that PG&E can have authorization to participate in the CAISO's CRR nomination and allocation process with the upfront achievable standards and criteria presented in this Advice Letter.

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. Address changes to the General Order 96-B 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>



Vice President, Regulatory Relations

Attachments

cc: Service List R.06-02-013

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: David Poster

Phone #: (415) 973-1082

E-mail: DXPU@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) #: **3106-E**

Tier: [3]

Subject of AL: Update to PG&E's Assembly Bill 57 Procurement Plan to Clarify the Upfront Achievable Standards and Criteria for the Procurement of Congestion Revenue Rights

Keywords (choose from CPUC listing): CRR's, MRTU

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: **09/06/2007**

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

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: Brian K. Cherry, Vice President, Regulatory Relations

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

ABAG Power Pool	Douglass & Liddell	PG&E National Energy Group
Accent Energy	Downey, Brand, Seymour & Rohwer	Pinnacle CNG Company
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Ahmed, Ali	Duncan, Virgil E.	PPL EnergyPlus, LLC
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Ancillary Services Coalition	Dynergy Inc.	Price, Roy
Anderson Donovan & Poole P.C.	Ellison Schneider	Product Development Dept
Applied Power Technologies	Energy Law Group LLP	R. M. Hairston & Company
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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
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California Energy Commission	House, Lon	SPURR
California Farm Bureau Federation	Imperial Irrigation District	St. Paul Assoc
California Gas Acquisition Svcs	Integrated Utility Consulting Group	Sutherland, Asbill & Brennan
California ISO	International Power Technology	Tabors Caramanis & Associates
Calpine	Interstate Gas Services, Inc.	Tecogen, Inc
Calpine Corp	IUCG/Sunshine Design LLC	TFS Energy
Calpine Gilroy Cogen	J. R. Wood, Inc	Transcanada
Cambridge Energy Research Assoc	JTM, Inc	Turlock Irrigation District
Cameron McKenna	Luce, Forward, Hamilton & Scripps	U S Borax, Inc
Cardinal Cogen	Manatt, Phelps & Phillips	United Cogen Inc.
Cellnet Data Systems	Marcus, David	URM Groups
Chevron Texaco	Matthew V. Brady & Associates	Utility Resource Network
Chevron USA Production Co.	Maynor, Donald H.	Wellhead Electric Company
City of Glendale	MBMC, Inc.	White & Case
City of Healdsburg	McKenzie & Assoc	WMA
City of Palo Alto	McKenzie & Associates	
City of Redding	Meek, Daniel W.	
CLECA Law Office	Mirant California, LLC	
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	