

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



May 5, 2010

**Advice Letter 3638-E**

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: Revisions to Rate Schedule NEMVNMA, Virtual Net Energy Metering for Multifamily Affordable Housing (MASH/NSHP) with Solar Generator(s), to Provide an Alternative Metering Option**

Dear Ms. Yura:

Advice Letter 3638-E is effective June 8, 2009.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Julie A. Fitch'.

Julie A. Fitch, Director  
Energy Division

March 24, 2010

**Advice 3638-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject:      Revisions to Rate Schedule NEMVNMA, *Virtual Net Energy Metering for Multifamily Affordable Housing (MASH/NSHP) with Solar Generator(s)*, to Provide an Alternative Metering Option**

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

**Purpose**

In compliance with Decision (D.) 08-10-036, this filing seeks to make changes to Electric Rate Schedules NEMVNMA, *Virtual Net Energy Metering for Multifamily Affordable Housing (MASH/NSHP) with Solar Generator(s)*, to provide an alternate, potentially less expensive metering option for the generation output meter than the current tariff.

**Background**

Issued October 20, 2008, Appendix B of D.08-10-036, the Multifamily Affordable Solar Housing Decision, contained a requirement that each utility's Virtual Net Metering (VNM) tariff must comply with Public Utilities (PU) Code §2827 and at a minimum:

“The building owner / manager shall be responsible for, and shall bear all costs associated with, installing a generator output meter capable of recording solar energy system output in 15-minute increments, if required, to insure appropriate customer credits. ...”

In PG&E's original NEMVNMA tariff (See Advice 3422-E-A, effective June 8, 2009), PG&E believed that an interval meter would be necessary in most instances for the generator account because the tenant units and common area accounts had the possibility of being on, or switching to, any of various time-of-use rates having different time of use periods. For reference, the time-of-use (TOU) periods for the most common TOU rate schedules PG&E expected to encounter (E-6, E-7, and A-6 for the common area) are shown in Table 1 below:

Table 1 – Time-of-use periods for most common TOU rate schedules – illustrating the varying TOU periods for three common rate schedules that might occur in a NEMVNMA eligible facility.

| Rate Schedule  | Season   | Time-of-Use Period  |   |   |
|--|--|---|---|---|
|  |  | Peak  | Part-Peak   | Off-Peak  |
| E-6 / EL-6 Residential Time-of-Use Service (open to new customers)   | SUMMER (Service from May 1 through October 31):    | 1:00 p.m. to 7:00 p.m. Monday through Friday                    | 10:00 a.m. to 1:00 p.m. AND 7:00 p.m. to 9:00 p.m. Monday through Friday<br><br>Plus 5:00 p.m. to 8:00 p.m. Saturday and Sunday | All other times including Holidays <sup>1</sup> .   |
|  | WINTER (Service from November 1 through April 30): | n/a   | All other times including Holidays.   | All other times including Holidays.   |
| E-7 / EL-7 Residential Time-of-Use Service (closed to new customers) | Summer & Winter                                    | 12:00 noon to 6:00 p.m. Monday through Friday                   | n/a   | OFF-PEAK: All other hours   |
| A-6 Residential Time-of-Use Service                                  | SUMMER (Service from May 1 through October 31):    | 12:00 noon to 6:00 p.m. Monday through Friday (except holidays) | 8:30 a.m. to 12:00 noon Monday through Friday (except holidays) AND 6:00 p.m. to 9:30 p.m.                                      | 9:30 p.m. to 8:30 a.m. Monday through Friday All day Saturday, Sunday, and holidays                   |
|  | WINTER (Service from November 1 through April 30): |   | 8:30 a.m. to 9:30 p.m. Monday through Friday (except holidays)  | 9:30 p.m. to 8:30 a.m. Monday through Friday (except holidays) All day Saturday, Sunday, and holidays |

(While additional residential and commercial TOU rates are a possibility, PG&E expects flat rates and the TOU rates in this table to predominate in NEMVNMA arrangements.)

Because of the differences in TOU rate schedule time structures, as shown in Table 1, using a TOU meter to capture data for two or more TOU rates pushes the limits of a TOU meter's capability. As an example of this complexity, consider a

<sup>1</sup> "Holidays" for the purposes of this rate schedule are New Year's Day, President's Day, Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving Day, and Christmas Day. The dates will be those on which the holidays are legally observed.

scenario where two TOU rates are involved in a NEMVNMA facility, such as the E7 and E6. In order for PG&E to make the proper allocations, PG&E's meter would need to separate out 7 kWh periods just for summer weekdays: 12pm to 10 am, 10 am to noon, noon to 1pm, 1pm to 6pm, 6 pm to 7pm, 7pm to 9pm, and 9pm to 12pm. In such situations, interval meters excel, because they allow data to be recorded in 15 minute intervals. From this data, the allocation of the kWh to support the two or more different TOU rates can then be processed on a computer back at PG&E's office without encountering any meter limitations.

To date and based on recent PG&E experience in installing NEMVNMA arrangements, most cases involve only flat (non-TOU) rates (e.g., E1, A1, or E8) or only one TOU rate structure along with a flat rate. These situations are well within the capability of a TOU meter. The current TOU metering costs would provide a less expensive alternative to the interval meter option. For these reasons, PG&E requests authorization to make the TOU meter option available in NEMVNMA installations where an interval meter is not needed

### **Tariff Revisions**

To support this less costly approach, PG&E proposes to add a TOU meter option to its Electric Rate Schedule NEMVNMA. The following charges for its TOU meter options have been included:

| Service                | rate        | Single phase Meter |                 | 3 Phase Meter |                 |
|------------------------|-------------|--------------------|-----------------|---------------|-----------------|
| Troubleman             | \$182.70/hr | 1.0 hours          | \$182.70        | 1.0 hours     | \$182.70        |
| Rep                    | \$171.28/hr | 1.5 hours          | \$256.92        | 1.5 hours     | \$256.92        |
| Meter cost             |             |                    | \$123.65        |               | \$226.02        |
| (subtotal)             |             |                    | <b>\$563.27</b> |               | <b>\$665.64</b> |
| ITCC <sup>2</sup>      | (34%)       |                    | \$191.27        |               | \$226.32        |
| <b>total</b>           |             |                    | <b>\$754.84</b> |               | <b>\$891.96</b> |
| <b>One-time charge</b> |             |                    | <b>\$755</b>    |               | <b>\$890</b>    |

PG&E anticipates the need to adjust these charges periodically to allow for changes in labor costs, material costs and/or the ITCC rate and plans to do so in subsequent advice letters. PG&E also anticipates that when the Smart Meter program is able to support the NEMVNMA program, then these costs will be re-evaluated.

By adopting a retroactive date as the effective date of this change to the NEMVNMA tariff, PG&E will be able to refund to customers the difference in cost between the interval meter installed and the TOU meter option in those cases where the TOU meter would have been and continues to be an option.

<sup>2</sup> Income Tax Component of Contribution is based on current Internal Revenue Code.

**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 **April 13, 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: jnj@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:

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, California 94177

Facsimile: (415) 973-6520  
E-mail: PGETariffs@pge.com

**Effective Date**

PG&E requests that this advice filing become effective retroactively on **June 8, 2009**.

**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 and all electronic approvals should be directed to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at: **<http://www.pge.com/tariffs>**.

*Jane Yura-OB*

Vice President, Regulation and Rates

Attachments

cc: Service List R.08-03-008

# 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: Olivia Brown

Phone #: 415.973.9312

E-mail: [oxb4@pge.com](mailto:oxb4@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) #: 3638-E

**Tier:** 2

Subject of AL: Revisions to Rate Schedule NEMVNMA, Virtual Net Energy Metering for Multifamily Affordable Housing (MASH/NSHP) with Solar Generator(s), to Provide an Alternative Metering Option  
Keywords (choose from CPUC listing): Net Metering

AL filing type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.08-10-036

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: N/A

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: N/A

Resolution Required? ☐ Yes ☒ No

Requested effective date: June 8, 2009

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). N/A

Tariff schedules affected: Electric Schedule NEMVNMA

Service affected and changes proposed: 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**

**[gnj@cpuc.ca.gov](mailto:gnj@cpuc.ca.gov) and [mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)**

**Pacific Gas and Electric Company**

**Attn: Jane K. 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](mailto:PGETariffs@pge.com)**

**ATTACHMENT 1  
Advice 3638-E**

| <b>Cal P.U.C.<br/>Sheet No.</b> | <b>Title of Sheet</b>   | <b>Cancelling Cal<br/>P.U.C. Sheet No.</b> |
|---------------------------------|---|--|
| 29161-E                         | ELECTRIC SCHEDULE NEMVNMA<br>VIRTUAL NET ENERGY METERING FOR<br>MULTIFAMILY<br>AFFORDABLE HOUSING (MASH/NSHP) WITH<br>SOLAR GENERATOR(S)<br>Sheet 4 | 28285-E*                                   |
| 29162-E                         | ELECTRIC SCHEDULE NEMVNMA<br>VIRTUAL NET ENERGY METERING FOR<br>MULTIFAMILY<br>AFFORDABLE HOUSING (MASH/NSHP) WITH<br>SOLAR GENERATOR(S)<br>Sheet 5 | 28286-E*                                   |
| 29163-E                         | ELECTRIC TABLE OF CONTENTS<br>Sheet 1   | 29057-E                                    |
| 29164-E                         | ELECTRIC TABLE OF CONTENTS<br>RATE SCHEDULES<br>Sheet 4   | 29053-E                                    |





**ELECTRIC SCHEDULE NEMVNMA**  
**VIRTUAL NET ENERGY METERING FOR MULTIFAMILY**  
**AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S)**

Sheet 4

**SPECIAL  
 CONDITIONS:**

**1. METERING: NEMVNMA net energy metering shall be accomplished at:**

- a. The Generator Account where the Solar Generating Facility is located, using either:

(i) a PG&E interval meter (capable of recording solar energy system output in up to fifteen minute increments), if required by PG&E to allocate the Solar Energy Credit based on the OAS of the Customer Load Accounts in an Eligible Low Income Facility. The Owner shall be responsible for, and shall bear all costs associated with, PG&E providing and installing an interval meter for the Generator Account. The cost of the Owner's interval meter installation will be determined by PG&E and will vary on a site specific basis.

(ii) a PG&E "time-of-use" (TOU) meter, if based on review of the Customer Load Accounts' OASs PG&E is able to allocate the Solar Energy Credits. This option will only be available until any Customer Load Account OAS change necessitates that the Owner provide an interval meter per (i) in order to properly allocate Solar Energy Credits. The Owner shall be responsible for, and shall bear all costs associated with, PG&E providing and installing a TOU meter for the Generator Account (or upgrading to an interval meter if required in the future). For the TOU option, the Owner may choose charges based on either a one-time, up-front fee or as a monthly meter charge. Prices are as follows:

| TOU Meter Option | One Time upfront fee | Monthly Meter Charge                  |
|------------------|----------------------|---------------------------------------|
| Single Phase     | \$755.00             | Based on the OAS monthly meter charge |
| Three Phase      | \$890.00             | Based on the OAS monthly meter charge |

If the Generator Account has any load in addition to that of the solar energy system inverter(s), PG&E reserves the right to require the Owner to install a bi-directional PG&E meter appropriate to its otherwise applicable rate schedule and a generator output meter to determine the total generation and total usage at the Account. Additionally, the Owner will need to furnish at the Owner's expense a meter socket for the generation output meter and provide PG&E with unrestricted access to that meter and socket. If the Generator Account's existing electrical meter, together with the generation output meter, is not capable of determining the total usage necessary to bill its otherwise applicable rate schedule, the Owner shall be responsible for all expenses involved in purchasing and installing such metering.

- a. Each Common Area Account, if any exist, using PG&E metering appropriate to its otherwise applicable rate schedule.
- b. Each Residential Unit Account using PG&E metering appropriate to its otherwise applicable rate schedule.

(T)

(T)

(T)

(T)

(L)

(Continued)



**ELECTRIC SCHEDULE NEMVNMA**  
**VIRTUAL NET ENERGY METERING FOR MULTIFAMILY**  
**AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S)**

Sheet 5

SPECIAL  
CONDITIONS:  
(Cont'd.)

2. BILLING:

For each Customer Load Account, Consumption or production shall be valued as follows:

a. Annual Solar Energy Credit

The Annual Solar Energy Credit is the total energy (in kilowatt hours or kWh) as read on the generation output meter over the Relevant Period as defined in Special Condition 2 g.

(L)

(L)

b. The Annual Solar Energy Credit Allocation

The Owner at the time the Eligible Low Income Facility first takes service under NEMVNMA shall determine the initial percentage of Annual Solar Energy Credits allocated to the Common Area Account(s) versus the Residential Unit Accounts. This allocation shall remain fixed for at least five years, regardless of a Change in Owner. If incentives are received under the MASH program, the initial credit allocation must match the percentage of MASH incentive received for Track 1a (Common Area load offset) and Track 1b (Residential load offset).

After the initial five year period, the Owner may only modify this allocation once in any 12 month period. A reallocation of the solar credit becomes effective for each Customer Load Account on the first day of the next Billing Cycle where the Billing Cycle start date occurs at least five business days after the date of the Owner's request.

Any measured usage at the Generator Account over and above that required by the Solar Generating Facility itself, will be treated as if it is Common Area Account usage for the purposes of the Annual Solar Energy Credit Allocation and for billing.

For the Residential Unit Accounts, the percentage of solar energy credits (in kWh) allocated to each Residential Unit Account will be in proportion to the relative size of each unit, consistent with the manner in which affordable housing rents are established. This solar allocation percentage will be established initially by the Owner on Appendix A of the NEMVNMA application and interconnection agreement as described in Special Condition 3.

If there are multiple Common Area Accounts, the Owner must specify each Common Area Account allocation on Appendix A of the NEMVNMA application and interconnection agreement as described in Special Condition 3.

Once allocated, Credits (in dollars) will be calculated per the OAS for each Customer Load Account as described in Special Condition 2.c.

(Continued)



## ELECTRIC TABLE OF CONTENTS

Sheet 1

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Advice Letter No: 3638-E  
Decision No. D.08-10-036

Issued by  
**Jane K. Yura**  
Vice President  
Regulation and Rates

Date Filed March 24, 2010  
Effective June 8, 2009  
Resolution No. \_\_\_\_\_



**ELECTRIC TABLE OF CONTENTS**  
**RATE SCHEDULES**

Sheet 4

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Advice Letter No: 3638-E  
 Decision No. D.08-10-036

Issued by  
**Jane K. Yura**  
 Vice President  
 Regulation and Rates

Date Filed March 24, 2010  
 Effective June 8, 2009  
 Resolution No. \_\_\_\_\_

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

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