April 8, 2011

Advice Letter 3807-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: GRC Phase 3 IT Consultant Cost Reimbursement

Dear Ms. Yura:

Advice Letter 3807-E is effective February 15, 2011.

Sincerely,

Julie A. Fitch, Director
Energy Division
February 23, 2011

Advice 3807-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: GRC Phase 3 IT Consultant Cost Reimbursement

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 2.

Purpose

As directed in the August 18, 2010 scoping memo in PG&E’s 2010 Rate Design Window (“RDW”) Application (“A.”) 10-02-028, PG&E files this advice letter seeking authorization from the California Public Utilities Commission (“Commission”) to include in the Distribution Revenue Adjustment Mechanism (“DRAM”) costs PG&E will incur in reimbursing the Division of Ratepayer Advocates (“DRA”) for work performed by their retained IT consultant(s).

Background

On June 16, 2010, PG&E and DRA (“Parties”) entered into an agreement\(^1\) (“Agreement”), included herein as Attachment 1, where Parties agreed among other things to:

a) Move PG&E’s Real Time Pricing (“RTP”) and Revised Energy Statement (“RCES”) proposals and cost estimates into a new phase of A.10-03-014, GRC Phase 3;

b) Move PG&E IT cost estimates for Peak Time Rebate (“PTR”) in A.10-02-028 to Phase 3 of A.10-03-014, while the non-IT costs for PTR would remain in A.10-02-028; and

\(^1\) This agreement applied to DRA IT costs in two cases: a) GRC Phase 3 (where the PTR IT costs are currently located) and b) the default residential critical peak pricing case A.10-08-005.
c) Reimburse DRA for the work its IT consultants will perform in reviewing and sponsoring testimony on IT proposals and costs for RTP, RCES and PTR in GRC Phase 3, and default residential critical peak pricing in a separate case.  

Further, as part of Agreement, Parties agreed that the cumulative amount PG&E would reimburse DRA for work performed by their retained IT consultant(s) would not exceed Two Hundred and Forty Thousand Dollars ($240,000). The Agreement further stipulated that PG&E would record to DRAM for cost recovery purposes any amounts reimbursed to DRA for work performed by the retained IT consultant(s).

On December 31, 2010, PG&E filed a motion with the Commission seeking authorization to transfer PTR IT costs back to the 2010 RDW Proceeding, A.10-02-028. Within this motion, currently pending before the Commission, PG&E has agreed to work with DRA to amend the Agreement, increasing the authorized reimbursement cap of Two Hundred and Forty Thousand Dollars ($240,000) to Two Hundred and Ninety Thousand Dollars ($290,000), so as to cover any additional work DRA IT consultants would need to perform as a result of the Commission granting PG&E’s December 31, 2010, motion.

Therefore as directed in the August 18, 2010, scoping memo in A.10-02-028, PG&E files this advice letter seeking Commission authority to modify the DRAM to include for rate recovery purposes up to Two Hundred and Ninety Thousand Dollars ($290,000) that could be incurred in reimbursing DRA for work performed by their retained IT Consultant. If however, following this filing, the Commission denies PG&E’s December 31, 2010, motion which seeks to transfer PTR IT Costs from A.10-03-014 back to A.10-02-028, PG&E will only record to DRAM and seek recovery of up to Two Hundred and Forty Thousand Dollars ($240,000) for work performed by DRA’s retained consultant in reviewing IT costs in the GRC Phase 3 (RTP, RCES, and PTR IT) and default residential critical peak pricing proceedings.

**Proposed Preliminary Statement**

PG&E is requesting Commission authority to modify Preliminary Statement Part CZ, “Distribution Revenue Adjustment Mechanism,” to begin recording costs that PG&E will reimburse DRA for work performed by the retained IT consultant(s).

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2 Pursuant D.08-07-045, on August 9, 2010, PG&E filed A.10-08-005 proposing among other proposals, a default critical peak pricing (“CPP”) rate for residential customers. The default residential critical peak pricing is currently pending before the Commission.

3 PG&E proposed in the December 31, 2010, motion to recover the increase reimbursement cap amount ($50,000), through the same process as set forth in the Agreement for the initial $240,000, for which this Advice Letter seeks to establish.
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 March 15, 2011, 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 Tier 1 advice filing become effective as of February 15, 2011, so that any costs PG&E reimburses to DRA after that date for work performed by their retained IT Consultant can be recorded to DRAM for cost recovery purposes.

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 lists for A.10-02-028, A.10-03-014, and A.10-08-005. 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

Vice President - Regulation and Rates

Attachments

cc: Service Lists for A.10-02-028, A.10-03-014, and A.10-08-005
Company name/CPUC Utility No. Pacific Gas and Electric Company (ID U39 M)

Utility type:   Contact Person: Linda Tom-Martinez
☑ ELC   ☐ GAS    Phone #: (415) 973-4612
☐ PLC   ☐ HEAT  ☐ WATER    E-mail: lmt1@pge.com

EXPLANATION OF UTILITY TYPE
ELC = Electric  GAS = Gas
PLC = Pipeline  HEAT = Heat  WATER = Water

Advice Letter (AL) #: 3807-E  Tier: 1

Subject of AL: GRC Phase 3 IT Consultant Cost Reimbursement
Keywords (choose from CPUC listing): GRC/General Rate Case, Agreements
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:
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: February 15, 2011  No. of tariff sheets: 3
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: Electric Preliminary Statement Part CZ
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:

CPUC, Energy Division  Pacific Gas and Electric Company
Tariff Files, Room 4005  Attn: Jane Yura
DMS Branch  Vice President, Regulation and Rates
505 Van Ness Ave.,  77 Beale Street, Mail Code B10B
San Francisco, CA 94102  P.O. Box 770000
jnj@cpuc.ca.gov and mas@cpuc.ca.gov  San Francisco, CA 94177
E-mail: PGETariffs@pge.com
June 16, 2010

Ms. Dana Appling  
Division of Ratepayer Advocates  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  

Re: A.10-03-014, Pacific Gas and Electric Company General Rate Case, Phase 2, and  
A.10-02-028, Pacific Gas and Electric Company 2010 Rate Design Window Case  

Dear Ms. Appling,  

The purpose of this letter of understanding, which has been revised to address an issue raised by Mr. Como regarding paragraph 6 below, is to confirm the agreement between the Division of Ratepayer Advocates (DRA) and Pacific Gas and Electric Company (PG&E) regarding certain schedule and scope issues connected with A.10-03-014, PG&E’s currently pending 2011 General Rate Case Phase 2, and certain scope issues connected with A.10-02-028, PG&E’s currently pending 2010 Rate Design Window Case (2010 RDW).  

In A.10-03-014, PG&E has presented cost estimates and requested recovery for incremental costs to implement the Real-Time Pricing (RTP) and Revised Customer Energy Statement (RCES) proposals in its prepared testimony. In the 2010 RDW, PG&E also presented cost estimates and requested recovery for incremental costs to implement the 2-part Peak Time Rebate (PTR) proposal contained in its testimony. In both A.10-03-014 and the 2010 RDW, DRA has objected to the inclusion of the costs and recovery requests. PG&E has opposed DRA’s objection.  

In order to resolve the resulting scoping issues for A.10-03-014 and the 2010 RDW, and the scheduling question for A.10-03-014, DRA and PG&E jointly made the following proposal to the California Public Utilities Commission (CPUC) at the 2011 GRC Phase 2 Prehearing Conference on May 19, and in the PG&E, DRA, and TURN Joint Supplemental Prehearing Conference Statement filed with the CPUC on May 19:  

1. The RTP and RCES proposals and cost estimates, and the cost recovery requests for RTP and RCES, will be moved into a separate, new phase of A.10-03-014 (Phase 3) for litigation and decision. TURN also agrees to this proposal.  
2. The Information System (IT) costs for 2-part PTR in the 2010 RDW will also be moved into the new Phase 3. The non-IT costs for 2-part PTR will remain in the
2010 RDW to be litigated there. TURN also agrees to this proposal. DRA will withdraw its motion to strike the cost and recovery issues in the 2010 RDW.

3. DRA will retain an outside consultant with special expertise in IT for Phase 3 IT issues and default residential critical peak pricing IT issues. Because of factors unique to this situation, PG&E will reimburse DRA for the costs of the outside IT consultant work to review and sponsor testimony on the IT proposals and costs for a) RTP, RCES and 2-part PTR in Phase 3 and b) the default residential critical peak pricing case under Ordering Paragraph (OP) 8 of D.08-07-045. The cumulative amount reimbursed by PG&E shall not exceed $240,000.00.

4. PG&E will record the amounts reimbursed to DRA in the Distribution Revenue Adjustment Mechanism (DRAM) for rate recovery. At its discretion, PG&E may file an advice letter to modify the DRAM to include the costs incurred to reimburse DRA. DRA will support expeditious approval of the advice letter.

5. DRA and PG&E support the following schedule for Phase 2 and the new Phase 3, in A.10-03-014.

<table>
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<tr>
<th>Event</th>
<th>Revised GRC Phase 2 (Marginal costs, revenue allocation, rate design other than RTP)</th>
<th>GRC Phase 3 (RTP, RCES, IT costs in PTR)</th>
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</tr>
<tr>
<td>Final decision</td>
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<td>October 2011</td>
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DRA and PG&E recognize that the Presiding Commissioner and Administrative Law Judge may adopt a final schedule with somewhat different dates. DRA and PG&E agree that adoption of somewhat different dates in the final schedule will not be a material change for purposes of rendering this agreement null and void.

6. DRA and PG&E agree to be bound by all of the terms and provisions above and intend this agreement to be interpreted and treated as a unified, integrated agreement. In the event the Commission, Assigned Commissioner, or Administrative Law Judge

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1 The filing deadline in OP 8 was extended to August 9, 2010 in a letter from the Commission's Executive Director dated November 10, 2009.
Ms. Dana Appling  
June 16, 2010  
Page 3

in A.10-03-014 or A.10-02-028 rejects or does not implement any one or more of the terms or provisions of this agreement, the agreement will become null and void. Notwithstanding the foregoing, changes in the residential RTP and/or default residential PDP implementation schedule (e.g., should the Commission grant the pending petition for modification by DRA and TURN in A.09-02-022 and A.06-03-005 to delay implementation of those programs) shall not result in this agreement becoming null and void. However, this agreement shall not be applicable to a future case or cases involving default residential PDP and/or residential RTP that results from a Commission decision on the pending petition by DRA and TURN. This agreement applies to DRA’s IT consultant costs only in GRC Phase 3 and the August 2010 default residential PDP case.

Please contact me if you have any questions about the contents or subject of this letter of understanding. PG&E appreciates DRA’s courtesy and looks forward to a continued cooperative relationship on these matters.

Very truly yours,

Jane Yura, Vice President

On behalf of DRA, I agree to the terms of this letter of understanding.

By:  
Dana Appling, Director

Date: 6/16/2010

cc: Dexter Khoury  
Rashid A. Rashid  
Christopher Danforth  
Joe Como
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ELECTRIC PRELIMINARY STATEMENT PART CZ

DISTRIBUTION REVENUE ADJUSTMENT MECHANISM

CZ. DISTRIBUTION REVENUE ADJUSTMENT MECHANISM (DRAM) (Cont’d.)

5. ACCOUNTING PROCEDURES: (Cont’d.)

q. A debit or credit entry, as appropriate, to record the gain or loss on the sale of an electric distribution non-depreciable asset, as approved by the Commission.

r. A debit entry equal to the electric portion of incremental administrative costs and amounts written off as uncollectible associated with the payment deferral plan for qualifying citrus and other agricultural growers pursuant to Resolution E-4065, plus an allowance for franchise fees and uncollectibles (FF&U) accounts expense at the rates authorized in PG&E’s most recent GRC for the incremental administrative costs.

s. A debit entry equal to the Schedule E-BIP incentives paid to third party demand response aggregators, net of any penalties paid to PG&E, plus an allowance for Franchise Fees and Uncollectible Accounts expense.

t. A debit entry equal to the costs that PG&E will reimburse the Division of Ratepayer Advocates (DRA) for work performed by the retained IT consultant(s) in Application (A.) 10-02-028 as authorized by the Commission, recorded during the month, plus an allowance for Franchise Fees and Uncollectible Accounts expense. The costs that PG&E will reimburse DRA shall not exceed $240,000 (excluding an allowance for FF&U), subject to revision by the Commission.

u. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

6. SHAREHOLDER PARTICIPATION: PG&E’s shareholders bear some responsibility for economic risks and rewards associated with, but not limited to, Commission-approved economic discounts and credits to certain PG&E customers. This section ensures that ratepayers will not assume shareholders’ obligations.

Shareholder Participation will be calculated monthly as follows:

The amount of the Shareholder Participation Mechanism for Schedule ED, in accordance with Resolution E-3654.

Note: All debits and credits described above, except for that described in Section 5.t, shall include an allowance for franchise fees and uncollectible accounts expense.
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Advice Filing List
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- Alcantar & Kahl LLP
- Ameresco
- Anderson & Poole
- Arizona Public Service Company
- BART
- Barkovich & Yap, Inc.
- Bartle Wells Associates
- Bloomberg
- Bloomberg New Energy Finance
- Boston Properties
- Braun Blaising McLaughlin, P.C.
- Brookfield Renewable Power
- CA Bldg Industry Association
- CLECA Law Office
- CSC Energy Services
- California Cotton Ginters & Growers Assn
- California Energy Commission
- California League of Food Processors
- California Public Utilities Commission
- Calpine
- Cardinal Cogen
- Casner, Steve
- Chris, King
- City of Palo Alto
- City of Palo Alto Utilities
- Clean Energy Fuels
- Coast Economic Consulting
- Commercial Energy
- Consumer Federation of California
- Crossborder Energy
- Davis Wright Tremaine LLP
- Day Carter Murphy
- Defense Energy Support Center
- Department of Water Resources
- Dept of General Services
- Division of Business Advisory Services
- Douglass & Lidell
- Downey & Brand
- Duke Energy
- Dutcher, John
- Economic Sciences Corporation
- Ellison Schneider & Harris LLP
- Foster Farms
- G. A. Krause & Assoc.
- GLJ Publications
- Goodin, MacBride, Squeri, Schlotz & Ritchie
- Green Power Institute
- Hanna & Morton
- Hitachi
- In House Energy
- International Power Technology
- Intestate Gas Services, Inc.
- Lawrence Berkeley National Lab
- Los Angeles Dept of Water & Power
- Luce, Forward, Hamilton & Scripps LLP
- MAC Lighting Consulting
- MBMC, Inc.
- MRW & Associates
- Manatt Phelps Phillips
- McKenzie & Associates
- Merced Irrigation District
- Modesto Irrigation District
- Morgan Stanley
- Morrison & Foerster
- NLine Energy, Inc.
- NRG West
- Navigant Consulting
- Norris & Wong Associates
- North America Power Partners
- North Coast Solar Resources
- Northern California Power Association
- Occidental Energy Marketing, Inc.
- OnGrid Solar
- Praxair
- R. W. Beck & Associates
- RCS, Inc.
- Recurrent Energy
- SCD Energy Solutions
- SCE
- SMUD
- SPURR
- San Francisco Public Utilities Commission
- Santa Fe Jets
- Seattle City Light
- Sempra Utilities
- Sierra Pacific Power Company
- Silicon Valley Power
- Silo Energy LLC
- Southern California Edison Company
- Spark Energy, L.P.
- Sun Light & Power
- Sunshine Design
- Sutherland, Asbill & Brennan
- Tabors Caramanis & Associates
- Tecogen, Inc.
- Tiger Natural Gas, Inc.
- TransCanada
- Turlock Irrigation District
- United Cogen
- Utility Cost Management
- Utility Specialists
- Verizon
- Wellhead Electric Company
- Western Manufactured Housing Communities Association (WMA)
- eMeter Corporation