

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 12, 2012

Advice Letter 4122-E

Brian K. Cherry
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**Subject: Revisions to the Net Energy Metering (NEM) Cap in Electric Rate Schedules
NEM, NEMVMASH and NEMV**

Dear Mr. Cherry:

Advice Letter 4122-E is effective as of November 3, 2012.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, Director
Energy Division

October 4, 2012

Advice 4122-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Revisions to the Net Energy Metering (NEM) Cap in Electric Rate Schedules NEM, NEMVMASH and NEMV

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

Purpose

As required by the *Assigned Commissioner’s Ruling Providing Instructions on Calculation of Non-Coincident Aggregate Customer Peak Demand Pursuant to Ordering Paragraph 3 of Decision 12-05-036 (Ruling)*, PG&E is submitting changes to the following Electric Rate Schedules to reflect the methodology for deriving the non-coincident aggregate customer peak demand used in calculating the NEM Cap and the customer generating capacity that may participate in the NEM program: NEM - *Net Energy Metering Service*, NEMVMASH – *Virtual Net Energy Metering For Multifamily Affordable Housing (MASH/NSHP) With Solar Generator(s)* and NEMV – *Virtual Net Energy Metering For A Multi-Tenant or Multi-Meter Property Served At The Same Service Delivery Point*.¹ The NEM program is currently capped at 5% of aggregate customers non-coincident aggregate customer peak demand.²

Background

The Commission issued D.12-05-036 clarifying that aggregate customer peak demand means the aggregation, or sum of individual customers’ peak demand, referred to as their non-coincident peak demands. D. 12-05-036 also required PG&E, Southern California Edison, and San Diego Gas & Electric Company (collectively, “the utilities”) to file advice letters with revised NEM tariffs to conform to OP1 and the instructions issued

¹ The Ruling modified Ordering Paragraph (OP) 4 of Decision (D.) 12-05-036 regarding the filing date of this advice letter.

² AB 510 signed by the Governor on February 26, 2010, and which became effective January 1, 2011, adopted the 5% cap. (http://www.leginfo.ca.gov/pub/09-10/bill/asm/ab_0501-0550/ab_510_bill_20100226_chaptered.html). PG&E modified its NEM tariff in AL 3778-E to include the new 5% cap.

by the assigned Commissioner on the methodology for calculating non-coincident aggregate customer peak demand.³ As required by that decision, the Energy Division held a workshop to discuss methods for estimating non-coincident aggregate customer peak demand. On September 4, 2012, Commissioner Michael Peevey issued a Ruling instructing the utilities on the methodology to be used for calculating the non-coincident aggregate customer peak demand.

Methodology for Calculating Non-Coincident Aggregate Customer Peak Demand

When calculating the non-coincident aggregate peak demand, the Ruling requires the utilities to:

1. Use load research data to calculate non-coincident aggregate peak demand;
2. Use a four-year moving average based on annual load research data;
3. Update the NEM Cap calculation annually by October 1⁴. However, if the non-coincident aggregate peak demand decreases in a given year, the NEM cap will remain at the previously determined level and may not decrease below the most recent level determined;
4. Use 15- or 30-minute interval data for calculating the non-coincident aggregate customer peak demand when incorporating data prior to 2013 into the four-year moving average. Use 15-minute interval data for load research data when including 2013 and subsequent year's data in the four-year moving average.

Beginning October 1, 2013, and every year thereafter, the utilities will file an advice letter to calculate their respective NEM caps based on the four year average of the most recently available annual non-coincident peak load data, which for 2013 will consist of 2008-2011 non-coincident peak demand data.⁵

Calculation of the 2012 NEM Cap

In the Ruling, the Commission states that the advice letter for the 2012 NEM cap calculation should use the average of 2007-2010 annual load research data for determining the non-coincident aggregate customer peak demand. Using this requirement, PG&E's NEM cap is 1.39 % as of August 31, 2012, which was calculated based on the following data⁶:

³ OP 3

⁴ Beginning October 1, 2013.

⁵ The Ruling requires the 2012 NEM Cap advice letter to be filed by October 4, 2012.

⁶ PG&E will continue to make available on its website monthly updates to the NEM Cap to reflect additional customer capacity participating in the program.

PG&E's NEM interconnected customer generating capacity as of August 31, 2012⁷ of 670.34 Megawatts (MWs);

PG&E's 4 year annual average from 2007 through 2010 non-coincident aggregate customer peak demand⁸ of 48,177 MWs;

This results in a NEM Cap calculation of $670.34 / 48,177 = 1.39\%$, which reflects the progress toward the 5% cap of aggregate customers non-coincident aggregate customer peak demand.

Potential Suspension of the NEM Program

Ordering Paragraph 6 of D.12-05-036 requires the utilities to suspend the NEM program for new customer-generators at the end of calendar year 2014, pending the issuance of new rules in a rulemaking proceeding to be undertaken. This temporary suspension of the NEM program for new customers, effective January 1, 2015, will remain in effect until such new rules are issued. If new rules are issued by December 31, 2014, then no suspension of the program need occur.

Tariff Revisions

Electric Rate Schedule NEM

- Language is added to close the program to new customers when the cap is reached and that PG&E will update its NEM cap annually on Oct 1, starting in 2013.
- Language is added to define PG&E's aggregate customer peak demand as "the sum of customers' non-coincident peak demands defined in D. 12-05-036. The methodology for calculating customer's non-coincident aggregate peak demand is detailed in the Assigned Commissioner's Ruling Providing Instructions on Calculation of Non-Coincident Aggregate Customer Peak Demand Pursuant to Ordering Paragraph 3 of Decision 12-05-036, dated September 4, 2012, which requires the following Using load research data to calculate non-coincident aggregate peak demand;
 - 1) Using a four-year moving average based on annual load research data;
 - 2) If the non-coincident aggregate peak demand decreases in a given year, the NEM cap will remain at the previously determined level and may not decrease below the most recent level determined;
 - 3) Using 15-minute interval data for calculating non-coincident aggregate customer peak demand when including 2012 data in the four-year moving

⁷ Includes customers participating in the following electric tariffs-NEM, NEMV, and NEMVMASH

⁸ PG&E used 30 minute interval data for the 2007-2010 periods.

average. 15- or 30-minute interval data may be used when incorporating data prior to 2012 into the four-year moving average.”

- A footnote is added that states, “D.12-05-036 requires the NEM program for new customers to be suspended at the end of calendar year 2014, pending the outcome of further Commission proceedings. Existing customers receiving service under this NEM service prior to January 1, 2015, will not be affected by this suspension.”

Electric Rate Schedule NEMVMASH

- References to the NEM tariffs are corrected to refer to the Schedules NEM, NEMVMASH and NEMV.
- The same footnote added to Schedule NEM is added to NEMVMASH.

Electric Rate Schedule NEMV

- The same footnote added to Schedule NEM and NEMVMASH is added to Schedule NEMV.

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 **October 24, 2012**, 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: 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 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

PG&E requests that this Tier 2 advice filing become effective on regular notice, **November 3, 2012**, which is 30 calendar days after the date of filing.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R. 10-05-004. 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 any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>.

Brian Cherry /IG

Vice President, Regulatory Relations

Attachments

cc: Service List R.10-05-004

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 E)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Igor Grinberg

Phone #: (415) 973-8580

E-mail: ixg8@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) #: **4122-E**

Tier: **2**

Subject of AL: **Revisions to the Net Energy Metering (NEM) Cap in Electric Rate Schedules NEM, NEMVMASH and NEMV**

Keywords (choose from CPUC listing): **Compliance, Metering**

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: **D.12-05-036**

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: **November 3, 2012**

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 Rates NEM, NEMV & NEMVMASH**

Service affected and changes proposed: **Changes to reflect the methodology for deriving the non-coincident aggregate customer peak demand used in calculating the NEM Cap and the customer generating capacity that may participate in the NEM program**

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

EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Brian K. Cherry, Vice President, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

**ATTACHMENT 1
Advice 4122-E**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
32067-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 1	30771-E
32068-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 2	30772-E
32069-E	ELECTRIC SCHEDULE NEMV VIRTUAL NET METERING FOR A MULTI- TENANT OR MULTI-METER PROPERTY SERVED AT THE SAME SERVICE DELIVERY POINT Sheet 3	31548-E
32070-E	ELECTRIC SCHEDULE NEMVMASH VIRTUAL NET ENERGY METERING FOR MULTIFAMILY AFFORDABLE HOUSING (MASH/NSHP) WITH SOLAR GENERATOR(S) Sheet 2	31626-E
32071-E	ELECTRIC TABLE OF CONTENTS Sheet 1	32065-E
32072-E	ELECTRIC TABLE OF CONTENTS RATE SCHEDULES Sheet 6	31850-E



ELECTRIC SCHEDULE NEM
NET ENERGY METERING SERVICE

Sheet 1

APPLICABILITY: This net energy-metering schedule is applicable to a customer who uses a Renewable Electrical Generation Facility as defined below with a capacity of not more than 1,000 kilowatts that is located on the customer's owned, leased, or rented premises, is interconnected and operates in parallel with PG&E's transmission and distribution systems, including wind energy co-metering customers as defined in California Public Utilities Code Section 2827.8, and is intended primarily to offset part or all of the customer's own electrical requirements (hereinafter "eligible customer-generator" or "customer"). Certain incremental billing and metering costs set forth in this schedule that are related to net energy metering are applicable to Energy Service Providers (ESPs) serving eligible customer-generators.

This service is not applicable to a Direct Access (DA) customer where the customer's ESP does not offer a net energy metering tariff. In addition, if an eligible customer-generator participates in direct transactions with an ESP that does not provide distribution service for the direct transactions, the ESP, and not PG&E, is obligated to provide net energy metering to the customer.

This rate schedule is available on a first-come, first-served basis to customers that provide PG&E with: (a) a completed Net Energy Metering Application including all supporting documents and required payments; AND (b) a completed signed Net Energy Metering Interconnection Agreement; AND (c) evidence of the customer's final inspection clearance from the governmental authority having jurisdiction over the generating facility; until such time as the total rated generating capacity used by eligible customer-generators on Rate Schedule NEM and NEMVMASH exceeds five (5) percent of PG&E's aggregate customer peak demand. Once this cap has been reached, Schedule NEM will be closed to new customers. PG&E is required to update its NEM cap, the amount of customer generating capacity eligible to participate in the program, annually on October 1st. (N)

The total rated generating capacity of eligible customer-generators will be calculated as the sum of all of the following: (T)

- 1) For each PV generating facility, PG&E will use the California Energy Commission's (CEC) AC rating; or where the CEC AC rating is not available, PG&E will multiply the inverter AC nameplate rating by 0.86.
- 2) For all other Renewable Electrical Generation Facilities, PG&E will use the AC nameplate rating of the generating facility.

PG&E's aggregate customer peak demand is the sum of customers' non-coincident peak demands defined in D. 12-05-036². The methodology for calculating customer's non-coincident aggregate peak demand is detailed in the Assigned Commissioner's Ruling Providing Instructions on Calculation of Non-Coincident Aggregate Customer Peak Demand Pursuant to Ordering Paragraph 3 of Decision 12-05-036, dated September 4, 2012, which requires the following: (T)

¹ Beginning October 1, 2013. (N)

² D.12-05-036 requires the NEM program for new customers to be suspended at the end of calendar year 2014, pending the outcome of further Commission proceedings. Existing customers receiving service under this NEM service prior to January 1, 2015, will not be affected by this suspension. However, NEM will continue to be available to renewable customer-sited generation until the target for solar photovoltaic capacity under the California Solar Initiative has been reached. (N)

(Continued)



ELECTRIC SCHEDULE NEM
NET ENERGY METERING SERVICE

Sheet 2

APPLICABILITY
 (Cont'd):

- 1) Using load research data to calculate non-coincident aggregate peak demand; (N)
- 2) Using a four-year moving average based on annual load research data; |
- 3) If the non-coincident aggregate peak demand decreases in a given year, the NEM cap will remain at the previously determined level and may not decrease below the most recent level determined; |
- 4) Using 15-minute interval data for calculating non-coincident aggregate customer peak demand when including 2012 data in the four-year moving average. 15- or 30-minute interval data may be used when incorporating data prior to 2012 into the four-year moving average. (N)

Customers seeking generator interconnections in portions of San Francisco and Oakland where PG&E has a network grid must contact PG&E about generation export limitations. (L)

A Renewable Electrical Generation Facility means a generating facility that generates electricity by using:

- a) biomass,
- b) solar thermal,
- c) photovoltaic,
- d) wind,
- e) geothermal,
- f) fuel cells using renewable fuels,
- g) small hydroelectric generation (but a small hydroelectric generation facility is not an eligible renewable electrical generation facility if it will cause an adverse impact on instream beneficial uses or cause a change in the volume or timing of streamflow),
- h) digester gas,
- i) municipal solid waste conversion,
- j) landfill gas,
- k) ocean wave,
- l) ocean thermal, or
- m) tidal current,

and any additions or enhancements to the facility using that technology pursuant to paragraph (1) of subdivision (a) of Section 25741 of the Public Resources Code. These renewable sources are defined in the latest version of the California Energy Commission's (CEC's) Renewables Portfolio Standard (RPS) Eligibility Guidebook and the Overall Program Guidebook³

³ The RPS Guidebooks can be found at: <http://www.energy.ca.gov/renewables/documents/index.html#rps>

(Continued)



ELECTRIC SCHEDULE NEMV
 VIRTUAL NET METERING FOR A MULTI-TENANT OR MULTI-METER
 PROPERTY SERVED AT THE SAME SERVICE DELIVERY POINT

Sheet 3

APPLICABILITY: A Renewable Electrical Generation Facility means a generating facility that
 (Cont'd.) generates electricity by using:

- a) biomass,
- b) solar thermal,
- c) photovoltaic,
- d) wind,
- e) geothermal,
- f) fuel cells using renewable fuels,
- g) small hydroelectric generation (but a small hydroelectric generation facility is not an eligible renewable electrical generation facility if it will cause an adverse impact on instream beneficial uses or cause a change in the volume or timing of streamflow),
- h) digester gas,
- i) municipal solid waste conversion,
- j) landfill gas,
- k) ocean wave,
- l) ocean thermal, or
- m) tidal current,

and any additions or enhancements to the generating facility using that technology pursuant to paragraph (1) of subdivision (a) of Section 25741 of the Public Resources Code. These renewable sources are defined in the latest version of the California Energy Commission's (CEC's) Renewables Portfolio Standard (RPS) Eligibility Guidebook and the Overall Program Guidebook⁴

Service Under Schedule NEMV is available on a first-come, first-served basis to Customers that provide PG&E with:

- a. a completed, signed NEMV application and interconnection agreement as described in Special Condition 4, including all supporting documents and required payments; AND
- b. evidence of the Customer's final inspection clearance from the governmental authority having jurisdiction over the Renewable Electrical Generation Facility;

until such time as the total rated generating capacity used by eligible Customer-generators and Qualified Customers on rate Schedule NEM, NEMV and NEMVMASH, exceeds five (5) percent of PG&E's aggregate customer peak demand (calculation as described in rate Schedule NEM).⁵ (N)

⁴ The RPS Guidebooks can be found at: <http://www.energy.ca.gov/renewables/documents/index.html#rps>

⁵ D.12-05-036 requires the NEM program for new customers to be suspended at the end of calendar year 2014, pending the outcome of further Commission proceedings. Existing customers receiving service under this NEM service prior to January 1, 2015, will not be affected by this suspension. (N)

(Continued)



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

Sheet 2

APPLICABILITY:
 (cont'd)

An "Eligible Low Income Development" is defined as all of the real property and apparatus employed in a single low income housing enterprise on contiguous parcels of land. These parcels may be divided by a dedicated street, highway or public thoroughfare or railway, so long as they are otherwise contiguous and part of the same single low income housing enterprise, and all under the same ownership.

Each of the four options a. through d. above is referred to in this tariff as a "Eligible Low Income Facility."

Certain incremental billing and metering costs set forth in this schedule that are related to net energy metering are applicable to Energy Service Providers (ESPs) and Community Choice Aggregators (CCA's) serving a Customer with a Load Account (as defined below in the *Applicability, Account Types* section).

This service is not applicable to a Direct Access (DA) Customer with a Load Account, where the Customer's ESP does not offer a net energy metering tariff. In addition, if the Customer participates in direct transactions with an ESP that does not provide distribution service for the direct transactions, the ESP, and not PG&E, is obligated to provide virtual net energy metering for multifamily affordable housing to the Customer.

NEMVMASH is available on a first-come, first-served basis to Customers with an Eligible Low Income Facility that provide PG&E with:

- a. a completed NEMVMASH application and interconnection agreement as described in Special Condition 3, including all supporting documents and required payments; AND
- b. evidence of the final inspection clearance from the governmental authority having jurisdiction over the Solar Generating Facility; until such time as the total rated generating capacity on Rate Schedules NEM, NEMV and NEMVMASH exceeds five (5) percent of PG&E's aggregate peak demand (calculated as described in Rate Schedule NEM)¹, until December 31, 2015, or until all funds available for the incentives have been allocated, whichever comes first. (T)
(N)

Generator Size - Size the generator(s) no larger than for the energy requirements of all eligible account types of the past year for existing housing and estimated requirements of new housing. Specific size limit details will be determined by the relevant incentive program (MASH or NSHP) handbooks. These generator size limits apply to all Eligible Low Income Developments whether they actually receive MASH or NSHP incentives or not.

¹ D.12-05-036 requires the NEM program for new customers to be suspended at the end of calendar year 2014, pending the outcome of further Commission proceedings. Existing customers receiving service under this NEM service prior to January 1, 2015, will not be affected by this suspension. (N)
(N)

(Continued)



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Sheet 1

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Sheet 6

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

AT&T	Department of General Services	Norris & Wong Associates
Alcantar & Kahl LLP	Department of Water Resources	North America Power Partners
Ameresco	Dept of General Services	North Coast SolarResources
Anderson & Poole	Douglass & Liddell	Northern California Power Association
BART	Downey & Brand	Occidental Energy Marketing, Inc.
Barkovich & Yap, Inc.	Duke Energy	OnGrid Solar
Bartle Wells Associates	Economic Sciences Corporation	PG&E
Bloomberg	Ellison Schneider & Harris LLP	Praxair
Bloomberg New Energy Finance	Foster Farms	R. W. Beck & Associates
Boston Properties	G. A. Krause & Assoc.	RCS, Inc.
Braun Blaising McLaughlin, P.C.	GLJ Publications	SCD Energy Solutions
Brookfield Renewable Power	GenOn Energy Inc.	SCE
CA Bldg Industry Association	GenOn Energy, Inc.	SMUD
CENERGY POWER	Goodin, MacBride, Squeri, Schlotz & Ritchie	SPURR
CLECA Law Office	Green Power Institute	San Francisco Public Utilities Commission
California Cotton Ginners & Growers Assn	Hanna & Morton	Seattle City Light
California Energy Commission	Hitachi	Sempra Utilities
California League of Food Processors	In House Energy	Sierra Pacific Power Company
California Public Utilities Commission	International Power Technology	Silicon Valley Power
Calpine	Intestate Gas Services, Inc.	Silo Energy LLC
Cardinal Cogen	Lawrence Berkeley National Lab	Southern California Edison Company
Casner, Steve	Los Angeles County Office of Education	Spark Energy, L.P.
Center for Biological Diversity	Los Angeles Dept of Water & Power	Sun Light & Power
Chris, King	Luce, Forward, Hamilton & Scripps LLP	Sunrun Inc.
City of Palo Alto	MAC Lighting Consulting	Sunshine Design
City of Palo Alto Utilities	MRW & Associates	Sutherland, Asbill & Brennan
City of San Jose	Manatt Phelps Phillips	Tecogen, Inc.
City of Santa Rosa	Marin Energy Authority	Tiger Natural Gas, Inc.
Clean Energy Fuels	McKenzie & Associates	TransCanada
Clean Power	Merced Irrigation District	Turlock Irrigation District
Coast Economic Consulting	Modesto Irrigation District	United Cogen
Commercial Energy	Morgan Stanley	Utility Cost Management
Consumer Federation of California	Morrison & Foerster	Utility Specialists
Crossborder Energy	Morrison & Foerster LLP	Verizon
Davis Wright Tremaine LLP	NLine Energy, Inc.	Wellhead Electric Company
Day Carter Murphy	NRG West	Western Manufactured Housing Communities Association (WMA)
Defense Energy Support Center	NaturEner	eMeter Corporation