

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 7, 2014

Advice Letters 3440-G/4330-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: Joint Utility Filing: SoCalGas, SDG&E, PG&E, and SCE - Submission of Energy Efficiency (EE) Program Final Report of the "Data Working Group" in Compliance with Ordering Paragraph (OP) 13C of D.12-09-044

Dear Mr. Cherry:

Advice Letters 3440-G/4330-E are effective December 16, 2013.

Sincerely,

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

Edward F. Randolph, Director
Energy Division



Rasha Prince
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011
Tel: 213.244.5141
Fax: 213.244.4957
RPrince@semprautilities.com

December 16, 2013

Advice 4579

(Southern California Gas Company U 904 G)

Advice 2557-E/2252-G

(San Diego Gas & Electric Company U 902 M)

Advice 3440-G/4330-E

(Pacific Gas and Electric Company U 39 M)

Advice 2988-E

(Southern California Edison Company U 338 E)

Public Utilities Commission of the State of California

Subject: Submission of Energy Efficiency (EE) Program Final Report of the “Data Working Group” in Compliance with Ordering Paragraph (OP) 13c of Decision (D.) 13-09-044

Southern California Gas Company (SoCalGas), on behalf of itself, San Diego Gas and Electric Company (SDG&E), Southern California Edison Company (SCE) and Pacific Gas and Electric Company (PG&E) (together the “Investor Owned Utilities”, or “IOUs”) hereby submit this Tier 1 Advice Letter (AL) containing the Final Report of the Data Working Group (DWG) as directed in D.13-09-044, the Decision Implementing 2013-2014 Energy Efficiency Financing Pilot Programs.

Purpose

D.13-09-044 directed the IOUs to convene the Energy Efficiency (EE) Finance Programs DWG to finalize its March 2012 draft report which identifies data collection requirements for all post-2012 EE finance programs, and associated activities and documents (e.g., customer consent forms).

This filing complies with Ordering Paragraph (OP) 13c of D.13-09-044, which requires SoCalGas to file the Final Report of the DWG in a Tier 1 AL by December 15, 2013¹ and serve

¹ December 15, 2013, falls on a Sunday. Rule 1.15 of the Commission’s Rules of Practice and Procedure and Rule 1.5 of the Commission’s General Order 96-B provide that if the last day does not fall on a business day, the time limit is extended to the first business day thereafter. Therefore, this AL is timely submitted.

it to the service list for the consolidated proceedings for Approval of 2013-2014 Energy Efficiency Programs and Budget. The report is included herein as Attachment B.

Background

In D.12-05-015, the Decision Providing Guidance on 2013 – 2014 Energy Efficiency Portfolios and 2012 Marketing, Education and Outreach, the Commission ordered the IOUs to design a new set of financing programs to be offered as pilot programs on a consistent and statewide basis. To perform this activity, the IOUs were ordered to hire an expert financing consultant to design the new financing programs for 2013 – 2014.²

The decision also directed the IOUs to collect data on the performance of loans receiving credit enhancements (CEs) and On-Bill Financing (OBF) through current programs and build a database of California loan payment history from all sources of energy project loans.³ Furthermore, the decision required utilities to develop a database that will eventually, once confidentiality protocols are worked out, be able to provide anonymous customer data publicly.

In D.12-11-015, the Decision Approving 2013 – 2014 Energy Efficiency Programs and Budgets, the Commission indicated that in order to allow time for sufficient review and consideration, the financing pilots were deferred to a separate proceeding with authority delegated to the assigned Commissioner to finalize the design and launch of the pilots.⁴ The Commission expressed in that decision in connection with finance budget authorizations, that all entities operating programs in 2013 and 2014 participate in efforts to collect data to populate a database of financing-related information.⁵

D.13-09-044 was issued at the conclusion of the assigned Commissioner's review process, and approved seven pilot programs to be deployed in phases, according to the proposed Implementation Plan,⁶ which takes into account the potential timing for deployment of each pilot.

The decision also ordered the IOUs to finalize and submit the report by December 15, 2013 according to the following process / considerations:

- The Commission finds it reasonable for the IOUs to promptly initiate a workshop, in consultation with Energy Division staff, FIs, HBC, and CAEATFA, open to the public, to prompt finalization of the Draft Report (D.13-09-044, §7.2, p. 77).
- The DWG Final Report shall address, inter alia, relevant data elements for each pilot, sources, location, anonymization, management, and access (D.13-09-044, Ordering Paragraph 13).
- The IOUs and Energy Division shall generally conform to the Commission's guidelines for the steps necessary to finalize the data protocols for EE Finance and initiate the EE Finance database as set forth in Appendix D (D.13-09-044, Ordering Paragraph 13a).
- To the extent that the Commission adopts privacy protocols or anonymization standards in Rulemaking 08-12-009 applicable to the EE Finance Database, the EE Finance DWG

² D.12-05-015, Ordering Paragraphs 21 and 22, p. 400. SoCalGas and the IOUs retained the consulting firm of Harcourt, Brown and Carey (HBC) to aid with the development of the finance pilots.

³ D.12-05-015, p. 125.

⁴ D.12-11-015, Ordering Paragraph 22, p. 135.

⁵ D.12-11-015, Ordering Paragraph 55, and p. 67.

⁶ D.13-09-044, Appendix G.

Final Report shall be consistent with those protocols and standards (D.13-09-044, Ordering Paragraph 13b).

D.13-09-044 also explained that the EE Finance database should be housed and managed by the California Hub for Energy Efficiency Financing (CHEEF), and requires individual consent by a pilot participant to release their energy usage and loan information.

Finalization of the DWG Report

In compliance with D.13-09-044, a public workshop was conducted by HBC on November 13, 2013, covering the draft report and other significant considerations regarding the collection of data to support deployment and ongoing implementation of the pilots. Meaningful input was provided by FIs and other stakeholders in attendance (both in person and by webinar) at the event.

D.13-09-044, Appendix D, also provided a schedule and guidelines for steps necessary to finalize data protocols of the DWG report. The DWG has met the schedule and generally followed these steps with the following notes:

- Aggregated data: the methods for appropriately anonymizing data for public access are pending in the CPUC's Energy Data Center proceeding and not yet available.
- Consent forms: Customers will utilize existing IOU Customer Information Standardized Request forms, or similar releases, to release project-specific EE data to the CHEEF. Financial Institutions will use their own forms or procedures to release financing-related data to the CHEEF. Finalization of forms is deferred until this matter can be addressed with the CHEEF's Master Servicer.⁷

With the completion of these milestones, the IOUs thus submit in Attachment B the final DWG report to the Commission for its consideration.

Role of CAEATFA as Finance Pilot Programs CHEEF

Concurrent with the post-decision development of the pilots for deployment, CAEATFA is undertaking activities to establish itself as the CHEEF to run the finance pilots. The CHEEF role is to structure the CEs; develop broad terms and conditions for financial products offered through the pilot programs; coordinate and track the deal flow between qualified FIs, IOUs, and customers; protect the integrity of ratepayer funds held as CEs; provide transparency; and ensure program compliance by the FIs and the IOUs.

CAEATFA will serve as the manager of the Master Servicer (MS), who will receive customer loan information for transmission to the IOUs and will receive loan payments from the IOUs for remission to the FIs. The MS will collect pilot data and store it for use by the Data Manager, who will aggregate and prepare data.

⁷ Note Appendix D instructs the IOUs to Identify matters that must be deferred for the Data Manager and/or Master Servicer in 2014.

Implementation of the DWG Report and Next Steps

The decision notes to stay on track for On-Bill Repayment (OBR) pilots roll-out, CAEATFA will need to select and obtain final approval of the Data Manager contract by February 2014. In compliance with D.13-09-044, SoCalGas will coordinate with CAEATFA and the selected Data Manager to implement the Final Report of the DWG and to integrate the finance program data provided by the IOUs for integration into the EE Finance Database.

In a parallel effort, the IOUs are continuing to consult with the Commission's Energy Division and FIs in order to provide required customer payment history data according to the provisions of D.13-09-044, Ordering Paragraph 12.b. A portion of this data has been submitted to the Commission. The remaining data will be provided by January 31, 2014 consistent with information privacy protocols that may be adopted in R.08-12-009.

Protests

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date of this Advice Letter, which is January 5, 2014. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attn: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). A copy of the protest should also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

For SCG:

Attn: Sid Newsom
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No. (213) 244-4957
E-mail: snewsom@SempraUtilities.com

For SDG&E:

Attn: Megan Caulson
Regulatory Tariff Manager
8330 Century Park Court, Room 32C
San Diego, CA 92123-1548
Facsimile No. (858) 654-1879
E-mail: MCaulson@semprautilities.com

For SCE:

Megan Scott-Kakures
Vice President, Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Leslie E. Starck
Senior Vice President, Regulatory Policy & Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

For PG&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, California 94177
Facsimile: (415) 973-7226
E-mail: PGETariffs@pge.com

Effective Date

The IOUs believe that this filing is subject to Energy Division disposition and, pursuant to D.13-09-044, is classified as Tier 1 (effective pending disposition). The IOUs respectfully request that this Advice Letter be approved December 16, 2013, the date filed.

Notice

A copy of this advice letter is being sent to all parties listed on Attachment A, which includes the interested parties in A.12-07-003, et al.

Rasha Prince
Director, Regulatory Accounts

Attachments

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. **SOUTHERN CALIFORNIA GAS COMPANY (U 904G)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Sid Newsom

Phone #: (213) 244-2846

E-mail: SNewsom@semprautilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 4579, et al.

Subject of AL: EE Program Final Report of the Data Working Group in Compliance with OP 13c of D.13-09-044

Keywords (choose from CPUC listing): Balancing Account

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.13-09-044

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 AL¹: N/A

Does AL request confidential treatment? If so, provide explanation: _____ No _____

Resolution Required? Yes No Tier Designation: 1 2 3

Requested effective date: 12/16/13 No. of tariff sheets: 0

Estimated system annual revenue effect (%): _____

Estimated system average rate effect (%): _____

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: None

Service affected and changes proposed¹ See Advice Letter

Pending advice letters that revise the same tariff sheets: None

Protests 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
Attention: Tariff Unit
505 Van Ness Ave.,
San Francisco, CA 94102
EDTariffUnit@cpuc.ca.gov

Southern California Gas Company
Attention: Sid Newsom
555 West 5th Street, GT14D6
Los Angeles, CA 90013-1011
SNewsom@semprautilities.com
tariffs@socalgas.com

¹ Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 4579, et al.

(See Attached Service Lists)

Alcantar & Kahl
Kari Harteloo
klc@a-klaw.com

Alcantar & Kahl
Seema Srinivasan
sls@a-klaw.com

Alcantar & Kahl LLP
Annie Stange
sas@a-klaw.com

Alcantar & Kahl, LLP
Mike Cade
wmc@a-klaw.com

Azusa Light & Water
George Morrow
gmorrow@ci.azusa.ca.us

Barkovich & Yap
Catherine E. Yap
cathy@barkovichandyap.com

Beta Consulting
John Burkholder
burkee@cts.com

CPUC
Consumer Affairs Branch
505 Van Ness Ave., #2003
San Francisco, CA 94102

CPUC
Energy Rate Design & Econ.
505 Van Ness Ave., Rm. 4002
San Francisco, CA 94102

CPUC
Pearlie Sabino
pzs@cpuc.ca.gov

CPUC - DRA
R. Mark Pocta
rmp@cpuc.ca.gov

California Energy Commission
Robert Kennedy
rkennedy@energy.state.ca.us

California Energy Market
Lulu Weinzimer
luluw@newsdata.com

Calpine Corp
Avis Clark
aclark@calpine.com

City of Banning
Paul Toor
P. O. Box 998
Banning, CA 92220

City of Burbank
Lincoln Bleveans
lbleveans@burbankca.gov

City of Colton
Thomas K. Clarke
650 N. La Cadena Drive
Colton, CA 92324

City of Long Beach Gas & Oil
Dennis Burke
Dennis.Burke@LongBeach.gov

City of Los Angeles
City Attorney
200 North Main Street, 800
Los Angeles, CA 90012

City of Pasadena - Water and Power
Dept.
G Bawa
GBawa@cityofpasadena.net

City of Riverside
Joanne Snowden
jsnowden@riversideca.gov

City of Vernon
Dan Bergmann
dan@igservice.com

Commerce Energy
Catherine Sullivan
csullivan@commerceenergy.com

Commerce Energy
Blake Lazusso
blasuzzo@commerceenergy.com

Crossborder Energy
Tom Beach
tomb@crossborderenergy.com

DGS
Henry Nanjo
Henry.Nanjo@dgs.ca.gov

Davis, Wright, Tremaine
Judy Pau
judypau@dwt.com

Douglass & Liddell
Donald C. Liddell
liddell@energyattorney.com

Douglass & Liddell
Dan Douglass
douglass@energyattorney.com

Downey, Brand, Seymour & Rohwer
Dan Carroll
dcarroll@downeybrand.com

Dynegy
Mark Mickelson
Mark.Mickelson@dynegy.com

Energy Division Tariff Unit
EDTariffUnit@cpuc.ca.gov

Gas Transmission Northwest
Corporation
Bevin Hong
Bevin_Hong@transcanada.com

General Services Administration
Facilities Management (9PM-FT)
450 Golden Gate Ave.
San Francisco, CA 94102-3611

Genon Energy, Inc.
Greg Bockholt
Greg.Bockholt@Genon.com

Goodin, MacBride, Squeri, Ritchie &
Day, LLP
James D. Squeri
jsqueri@gmsr.com

Hanna & Morton
Norman A. Pedersen, Esq.
npedersen@hanmor.com

Iberdrola Renewables Energy Services
Julie Morris
Julie.Morris@iberdrolaren.com

Imperial Irrigation District
K. S. Noller
P. O. Box 937
Imperial, CA 92251

JBS Energy
Jeff Nahigian
jeff@jbsenergy.com

Kern River Gas Transmission Company
Janie Nielsen
Janie.Nielsen@KernRiverGas.com

LADWP
Robert Pettinato
Robert.Pettinato@ladwp.com

LADWP
Nevenka Ubavich
nevenka.ubavich@ladwp.com

MRW & Associates
Robert Weisenmiller
mrw@mrwassoc.com

Manatt Phelps Phillips
Randy Keen
rkeen@manatt.com

Manatt, Phelps & Phillips, LLP
David Huard
dhuard@manatt.com

March Joint Powers Authority
Cindy Lockwood
lockwood@marchjpa.com

McKenna Long & Aldridge, LLP
John Leslie
jleslie@Mckennialong.com

National Utility Service, Inc.
Jim Boyle
One Maynard Drive, P. O. Box 712
Park Ridge, NJ 07656-0712

Navigant Consulting, Inc.
Ray Welch
ray.welch@navigantconsulting.com

Nexant, Inc.
Carl Huppert
chuppert@nexant.com

PG&E Tariffs
Pacific Gas and Electric
PGETariffs@pge.com

Praxair Inc
Rick Noger
rick_noger@praxair.com

RCS, Inc
Don Schoenbeck
dws@r-c-s-inc.com

Safeway, Inc
Cathy Ikeuchi
cathy.ikeuchi@safeway.com

Sierra Pacific Company
Christopher A. Hilén
chilen@sppc.com

Southern California Edison Co.
John Quinlan
john.quinlan@sce.com

Southern California Edison Co.
Karyn Gansecki
karyn.gansecki@sce.com

Southern California Edison Co.
Kevin Cini
Kevin.Cini@SCE.com

Southern California Edison Co.
Colin E. Cushnie
Colin.Cushnie@SCE.com

Southern California Edison Company
Michael Alexander
Michael.Alexander@sce.com

Southwest Gas Corp.
John Hester
John.Hester@swgas.com

TURN
Marcel Hawiger
marcel@turn.org

The Mehle Law Firm PLLC
Colette B. Mehle
cmehle@mehlelaw.com

Western Manufactured Housing
Communities Assoc.
Sheila Day
sheila@wma.org

<p>BUILDING PERFORMANCE INSTITUTE, INC. SHANDRA (TIGER) ADOLF tadolf@bpi.org</p>	<p>ELLA BAKER CENTER FOR HUMAN RIGHTS NWAMAKA AGBO nwamaka@ellabakercenter.org</p>	<p>BRIGHTLINE DEFENSE PROJECT EDDIE H. AHN eddie@brightlinedefense.org</p>
<p>CAL. BLDG. PERFORMANCE CONTRACTORS ASSN CONRAD ASPER Conrad@TheCBPCA.org</p>	<p>NATIONAL ASIAN AMERICAN COALITION FAITH BAUTISTA Faith.MabuhayAlliance@gmail.com</p>	<p>FIVE STAR BANK JAMES BECKWITH 6810 FIVE STAR BLVD., STE 100 ROCKLIN, CA 95677</p>
<p>CPUC - ENERGY DIVISION DANIEL BUCH Daniel.Buch@cpuc.ca.gov</p>	<p>CITY OF BERKELEY TIMOTHY BURROUGHS tburroughs@cityofberkeley.info</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Simon Baker seb@cpuc.ca.gov</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Jeremy Battis jbe@cpuc.ca.gov</p>	<p>BLACK ECONOMIC COUNCIL LEN CANTY lencanty@blackeconomiccouncil.org</p>	<p>COUNTY OF LOS ANGELES HOWARD CHOY hchoy@isd.co.la.ca.us</p>
<p>CPUC MICHAEL COLVIN michael.colvin@cpuc.ca.gov</p>	<p>CALIFORNIA CENTER FOR SUSTAINABLE ENERGY SACHU CONSTANTINE sachu.constantine@energycenter.org</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Moises Chavez mcv@cpuc.ca.gov</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Jeanne Clinton cln@cpuc.ca.gov</p>	<p>GREEN FOR ALL KATHERINE DANIEL kat@greenforall.org</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Melanie Darling md2@cpuc.ca.gov</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Tim G. Drew zap@cpuc.ca.gov</p>	<p>NATURAL RESOURCES DEFENSE COUNCIL LARA ETTENSON lettenson@nrdc.org</p>	<p>CITY OF OAKLAND GARRETT FITZGERALD gfitzgerald@oaklandnet.com</p>
<p>ATKINSON, ANDELSON, LOYA, RUUD & ROMO ROBERT FRIED rfried@aalrr.com</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Julie A. Fitch jf2@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Cathleen A. Fogel cf1@cpuc.ca.gov</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Hazlyn Fortune hcf@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Tory Francisco tnf@cpuc.ca.gov</p>	<p>PACIFIC GAS & ELECTRIC COMPANY MARY GANDESBERY mary.gandesbery@pge.com</p>
<p>CAL. ENERGY EFFICIENCY INDUSTRY COUNCIL MARGIE GARDNER policy@efficiencycouncil.org</p>	<p>WOMEN'S ENERGY MATTERS BARBARA GEORGE wem@igc.org</p>	<p>SOUTHERN CALIFORNIA EDISON COMPANY MONICA GHATTAS monica.ghattas@sce.com</p>
<p>NAT'L. ASSN. OF ENERGY SVC COMPANIES DONALD GILLIGAN dgilligan@naesco.org</p>	<p>CAEATFA SAUL ACOSTA GOMEZ Saul.Gomez@Treasurer.ca.gov</p>	<p>THE UTILITY REFORM NETWORK HAYLEY GOODSON hayley@turn.org</p>

<p>CALIF PUBLIC UTILITIES COMMISSION Monisha Gangopadhyay mgb@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Alice Glasner ag6@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Paula Gruending pg1@cpuc.ca.gov</p>
<p>CALIFORNIA ENERGY COMMISSION JANE HEINZ, J.D. Jane.Heinz@energy.ca.gov</p>	<p>PULSE ENERGY BRUCE HERZER bruce.herzer@PulseEnergy.com</p>	<p>SAN DIEGO UNIFIED PORT DISTRICT CODY HOOVEN chooven@portofsandiego.org</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Katherine Hardy keh@cpuc.ca.gov</p>	<p>KEYES FOX & WEIDMAN LLP JASON B. KEYES jkeyes@kfwlaw.com</p>	<p>CALIFORNIA HOUSING PARTNERSHIP CORP. MEGAN KIRKEBY MKirkeby@chpc.net</p>
<p>ADAMS BROADWELL JOSEPH & CARDOZO ELIZABETH KLEBANER eklebaner@adamsbroadwell.com</p>	<p>FIRSTFUEL SOFTWARE, INC. SAMUEL P. KRASNOW skrasnow@firstfuel.com</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Bruce Kaneshiro bsk@cpuc.ca.gov</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Jonathan P. Knapp jp8@cpuc.ca.gov</p>	<p>ABAG POWER JERRY LAHR JerryL@abag.ca.gov</p>	<p>DOUGLASS & LIDDELL DONALD C. LIDDELL liddell@energyattorney.com</p>
<p>JODY LONDON CONSULTING JODY S. LONDON jody_london_consulting@earthlink.net</p>	<p>GLOBAL GREEN USA MARY LUEVANO mluevano@globalgreen.org</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Peter Lai ppl@cpuc.ca.gov</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Jean A. Lamming jl2@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Xian Cindy Li xl2@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Aaron Lu al8@cpuc.ca.gov</p>
<p>CALIFORNIA PUBLIC UTILITIES COMMISSION JACLYN MARKS jaclyn.marks@cpuc.ca.gov</p>	<p>BUILD IT GREEN BRUCE MAST bruce@builditgreen.org</p>	<p>HEATING AIR-CONDITIONING & REFRIGERATION JONATHAN MELCHI jmelchi@hardinet.org</p>
<p>CALIF. CLIMATE AND AGRICULTURE NETWORK JEANNE MERRILL jeannemerrill@gmail.com</p>	<p>CITY OF CHULA VISTA - CITY ATTY'S. OFF. BART C. MIESFELD bmiesfeld@chulavistaca.gov</p>	<p>SARA STECK MYERS ssmyers@att.net</p>
<p>OPOWER MATTHEW O'KEEFE california@opower.com</p>	<p>WILSON SONSINI GOODRICH & ROSATI PC SHERIDAN J. PAUKER, ESQ. SPauker@wsgr.com</p>	<p>CPUC - DRA DAVID B. PECK dbp@cpuc.ca.gov</p>
<p>CONSUMER ELECTRONICS ASSOCIATION MICHAEL PETRICONE MPetricone@ce.org</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Lisa Paulo lp1@cpuc.ca.gov</p>	<p>ENVIRONMENTAL HEALTH COALITION KAYLA RACE Kaylar@environmentalhealth.org</p>

CRHMFA HOMEBUYERS FUND
ANTHONY RAHILL
ARahill@rcrcnet.org

SIERRA BUSINESS COUNCIL
JENNIFER ROSSER
JRosser@SBcouncil.org

COMMISSION OF MENDOCINO
COUNTY
CRAIG SCHLATTER
SchlattC@cdchousing.org

SYNERGY COMPANIES
STEVEN R. SHALLENBERGER
steve@synergycompanies.org

CITY AND COUNTY OF SAN
FRANCISCO
JEANNE M. SOLE
jeanne.sole@sfgov.org

MANATT PHELPS & PHILLIPS, LLP
JACK STODDARD
JStoddard@manatt.com

CALIF PUBLIC UTILITIES COMMISSION
Brian Stevens
brc@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Nils Strindberg
ns2@cpuc.ca.gov

CAEATFA
SARAH TAHERI
Sarah.Taheri@Treasurer.ca.gov

THE GREENLINING INSTITUTE
VIEN TROUNG
vient@greenlining.org

CALIF PUBLIC UTILITIES COMMISSION
George S. Tagnipes
jst@cpuc.ca.gov

MARIN ENERGY AUTHORITY
JEREMY WAEN
JWaen@MarinEnergy.com

CALIF PUBLIC UTILITIES COMMISSION
Karen Camille Watts-Zagha
kwz@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
Katie Wu
kw1@cpuc.ca.gov

SAN DIEGO GAS &
ELECTRIC/SOCALGAS
JOY C. YAMAGATA
JYamagata@SempraUtilities.com

LAT. BUS. CHAMBER OF GREATER
L.A.
info@lbcgla.com

ATTACHMENT B

Advice No. 4579, et al.

Final Data Working Group Report

California Energy Efficiency Finance

Data Working Group

Final Report

December 16, 2013

Acknowledgements

We thank the following individuals and their organizations for their participation and assistance to the final Data Working Group Report:

- Frank Spasaro, Southern California Gas Company (SCG)
- Albertina Chu, Southern California Gas Company (SCG)
- Jeff Barnes, San Diego Gas & Electric Company (SDG&E), *Team Chairperson*
- Gregg Lawless, San Diego Gas & Electric Company (SDG&E)
- Al Gaspari, Pacific Gas and Electric Company (PG&E)
- John Ku, Pacific Gas and Electric Company (PG&E)
- Alyssa Cherry, Southern California Electric Company (SCE)
- Elia Deanda, Southern California Edison Company (SCE)
- Monica Ghattas, Southern California Edison Company (SCE)
- Eric Lee, Southern California Edison Company (SCE)
- Priscilla Ortiz, Southern California Edison Company (SCE)
- Deana Carrillo, California Alternative Energy and Advanced Transportation Financing Authority (CAEATFA)
- Robert Hedrick, State Treasurer's Office (STO)
- Matthew Brown, Harcourt Brown & Carey (HBC)
- Mark Zimring, Tule Partners
- David Nemptow, Nemptow & Associates
- Aaron Berg, Blue Tree Strategies
- David Carey, Harcourt Brown & Carey (HBC), *Lead Consultant*

For further information contact: Jeff Barnes, SDG&E, at JBarnes@semprautilities.com.

Additional information about ***California EE Finance activities*** is at: www.caleefinance.com.

Data Working Group – *Final Report*

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Data Working Group – *Final Report*

Section 1. Executive Summary

The Data Working Group, convened by Southern California Gas Company at the request of the California Public Utilities Commission (CPUC), produced the following report (Report) to address issues and opportunities related to data collection and dissemination for the data required for the energy efficiency (EE) financing pilot programs authorized under CPUC Decision (D.) 13-09-044.¹

The Report describes potential users of data and their likely uses, as well as questions potential users may seek to answer about the impact of financing on the uptake of energy efficiency. Based on the identified users and uses, individual data elements were selected to capture information about the customers, properties, projects and financing as well as energy and payment performance for both residential and non-residential properties, subject to appropriate protections for customer privacy and commercially sensitive data.

In addition, the Report describes the role of the California Hub for Energy Efficiency Financing (CHEEF) and methodologies for collecting and managing data that may be made available to the CHEEF and Financial Institutions (FIs), consistent with customer privacy and data confidentiality requirements. The report addresses customer privacy issues through the use of express, prior written authorizations by each customer for collection and access to customer specific data, and the need to determine appropriate anonymization techniques to allow sharing and analysis of anonymized data subject to additional confidentiality protections for proprietary or commercially sensitive data.

The Report also describes the opportunity to collaborate with national and California-based data initiatives and proposes that, due to the “in-development” status of these initiatives, additional collaboration take place, including coordination of selected EE finance data elements to match existing datasets, to the extent possible.

A draft version of this Report² served as the basis for the Data Public Workshop held on November 13, 2013, which gave participants an opportunity to provide comments and propose enhancements. The input received from the Workshop is reflected in this final Report.

¹ Decision 13-09-044, “Decision Implementing 2013-2014 Energy Efficiency Financing Pilot Programs”, September 19, 2013, available at www.caleefinance.com/cpuc-formally-issues-and-posts-final-decision/.

² Draft available at <http://www.caleefinance.com/draft-data-working-group-report-available/>.

Section 2. Background

The CPUC directed Southern California Gas Company to use its “expert financing” consultant, Harcourt Brown & Carey, to convene a data Working Group (WG) to address issues with data collection and dissemination related to the Statewide EE finance programs (including the Pilots approved in D.13-09-044, On-Bill Financing, American Recovery and Reinvestment Act continuation programs, and Regional Energy Network programs). The WG was established in late 2012 and tasked accordingly. This Report describes the recommendations of the WG for the development of an energy finance database consisting of data generated by the pilots approved in D.13-09-044 and other similar utility-sponsored, CPUC-approved energy efficiency finance programs.

Section 3. The Purpose

As noted in D. 13-09-044, the CPUC cited the following three examples of the importance of data to the EE financing initiative:

1. “Data collection, subject to relevant privacy considerations, is essential to be able to test the value of various features of the authorized financing pilots. The data should be collected in a careful and comprehensive manner to ensure the relevant data are collected at the least cost.”³
2. Appropriate individual consent will be obtained from pilot program participants “for release of their own energy usage information and loan information as part of the EE Finance data collection and sharing protocols.”⁴
3. The Investor-Owned Utilities (IOUs), in collaboration with the WG, are looking to “develop a larger-scale database or databases of financing related data and information that could be shared publicly and that consists of the following minimum types of information: customer type, host site characteristics, utility payment history, borrower credit scores and energy project repayment history, energy project performance data, and billing impacts pre- and post-installation utility bills.”⁵

³D 13-09-044, page 73

⁴D. 13-09-044, page 73

⁵D. 13-09-044, page 74

The table below lists the individual finance Pilot programs being implemented under CPUC approval for 2013-2015 that are subject to the data requirements noted in this Report:

Pilot Name	Funding Source	Financial Product
Energy Finance Line Item Charge (EFLIC)	Stage 1: American Reinvestment and Recovery Act (ARRA) funded reserve; Stage 2: Private capital	Single family Loans
Master-Metered Multifamily Finance Program	Stage 1: Community Development Financial Institution (CDFI) capital, ARRA funded reserve; Stage 2: CDFI capital, Ratepayer funded reserve	Multifamily Loans
Non-On-Bill Repayment (OBR) Small Business Lease	Private capital, ratepayer funded reserve	Leases
OBR Non-Residential (typically Medium/Large) Business without Credit Enhancement (CE)	Private capital	Loans and Service Agreements
OBR Small Business Lease	Private capital, ratepayer funded reserve	Leases
OBR Small Business with Credit Enhancement	Private capital, ratepayer funded reserve	Loans
Single Family Loan Program	Private capital and ratepayer funded reserve	Single family loans

The following energy finance programs are currently operating in California, some of which rely on taxpayer or ratepayer⁶ support. All programs, including those not supported with taxpayer or ratepayer funding, will be encouraged to submit data to the Data Manager.

Program Name	Funding Source	Financial Product
California Alternative Energy and Advanced Transportation Financing Authority (CAEATFA)	Assembly Bill x1 14	Single family loans
California Pollution Control Financing Authority (CPCFA)	California Treasury, funded by Federal grant money	Small business loans
CRHMFA Homebuyers Fund (CHF)	IOU, ARRA Continuation Funding	Single family loans
emPower SBC (Santa Barbara County)	ARRA, Ratepayer funds	Residential loans
Energy Conservation Assistance Act (ECAA)	California State taxpayer	Public facilities loans
Los Angeles County Property Assessed Clean Energy (PACE)(operating under Southern California Regional Energy Network and City of Los Angeles)	Private Investors	Tax Assessments
Marin Energy Authority (MEA)	Private capital and ratepayer funds	Single family, multifamily and small business loans
On-Bill Financing (OBF)	Ratepayer funds	Non-residential loans

⁶The WG recommends that data from other existing finance programs (e.g., On-Bill Finance, American Reinvestment and Recovery Act continuation programs, Regional Energy Networks, etc.) be considered for inclusion in the database after transitional issues are resolved with obtaining complete datasets for contracts prior to the issuance of this report and the start of formal data collection. In addition, customer data privacy and proprietary data issues need to be resolved for this additional data because necessary data releases have not been obtained from customers and other entities participating in these other finance programs. If the transitional and customer data privacy issues cannot be resolved, then the data from existing finance programs will be provided by the IOUs in an alternative format.

Program Name	Funding Source	Financial Product
PACE Programs (various)	Governments or investors	Tax Assessments
Regional Energy Network (REN) Loan Programs	ARRA funds	Single family loans
Sacramento Municipal Utility District (SMUD) Loan Program	Ratepayer funds	Single family loans
Southern California Regional Energy Network (SoCalREN) Lease Financing	Private Investors	Leases

Section 4. Data Manager

The Data Manager will be a subcontractor to the CHEEF, which may be a subcontractor of the respective utilities and participating FIs, for purposes of collecting different types of data and sharing that data, with the utilities and FIs. The CHEEF/Master Servicer/Data Manager will be responsible for performing the following functions:

- Providing the required data elements and format to program participants
- Collecting and storing data pursuant to IOU and FI data security requirements as required
- Providing a quality control process to ensure that the data collected is complete and accurate
- Ensuring that there is a process in place to evaluate data collection requirements versus market needs and participant cost hurdles
- Providing appropriate levels of access to users
- Providing tools to analyze the data
- Establishing a secure web portal that will facilitate data collection efforts
- Compliance with IOU and Financial Institutions, third-party security requirements and regulations
- Providing online access and monthly reporting to CAEATFA, the Master Servicer and IOUs
- Other functions necessary to a useful database

Section 5. Data Users and Uses

There are five primary user types (Financial Institutions, Government, Program Managers, Product and Service Providers, and Property Asset Managers and/or Energy Customers) that have been identified, each with its own respective use(s) for data generated by these pilot programs that will be collected in this database and coordinated efforts.

Section 5a. Financial Institutions

The types of organizations that would invest in financial products originated under the pilot programs include:

- Capital Investors (including Institutional Investors)
- Financial instrument originators and Servicers
- Depositories (Banks and Credit Unions)
- Foundation Program-related investment (PRI) managers and other “mission” related investors
- Rating Agencies (Standard & Poor’s, Moody’s, Fitch)
- Data Providers (Bloomberg)
- IOUs (when providing capital or credit enhancement funding)
- Lease and financing companies

Financial Institution Data Uses

The following are typical questions that would be asked by the Financial Institutions’ class of users to better understand the relationship between the performance of financial instruments and energy savings. Investors want data that can help them understand and manage credit and energy performance risks. Providing data for the analysis of how these two categories interact with OBR might allow investors to take additional credit risk if it were offset by better energy performance.

- Does energy efficiency financing perform differently than other investments and what is the cause?
- Is there a correlation between property type and performance?
- Is there a correlation between loan performance and certain installed measures or combinations of measures?
- Do certain contractors achieve better energy savings performance than their peers?
- Do greater savings correlate to better loan performance?
- Do certain energy efficiency measures generate more predictable levels of savings?
- Is the level of expected energy savings used by the Investor to establish the eligible loan amount?

Section 5b. Government Users

This group of organizations covers decision-makers that authorize the use of sponsorship funding from ratepayers and/or taxpayers. This group also includes the array of program

evaluators and regulatory agencies that serve them, along with stakeholder advocates that provide input in the policy making process. Governmental Policy Makers access data from energy efficiency financing programs in accordance with their respective regulatory programs and in compliance with customer privacy and proprietary data protection requirements, such as the Public Utilities Code, Public Resources Code and California Information Practices Act.

Government users include:

- California Public Utilities Commission
- Legislatures
- Federal & State Agencies
- Environmental and Social Equity Advocates
- Division of Ratepayer Advocates (consumer protection)
- Evaluation, Measurement and Verification (contractors)

Government Data Uses:

The following are typical questions asked by government officials to better understand the cost, benefit and effectiveness of incentives to various parties.

- Do EE financing pilots increase consumer adoption of targeted EE improvements?
- What is the profile of applicants who are either rejected from the loans or decide not to move forward with the loan process?
- What program features (e.g., expanded customer access to capital, lower interest rates, loan term lengths, resolution of split incentives or long paybacks) are critical factors in driving increased EE adoption?
- What is the incremental cost per unit of energy efficiency gained?
- What program features have the most value to, or impact on, investors?
- What financial product concessions do pilots acquire through credit enhancement provision or OBR access?
- Are new Investors entering the market for energy efficiency financing or are new financial products being provided because of the pilots?
- If new investors are entering the market, is this evidence of market transformation and if so can credit enhancements be withdrawn without reducing participation?
- Is financing repayment performance of the OBR portfolio correlated with energy performance or predictability of energy performance?

Section 5c. Program Managers

Managers that operate energy efficiency programs and/or fund budgets and key program design features in order to maximize program effectiveness for the benefit of their customers or clients. These entities include:

- Local, state and federal governments
- RENs

- IOUs and Public Utilities
- Evaluation, Measurement and Verification contractors

Program Manager Data Uses:

The following are typical questions asked by program managers to help them understand the operational aspects of financing energy efficiency.

- What are the life cycle costs of OBR loans and programs?
- How can we reduce the administrative costs for OBR?
- How can we drive more customer demand?
- How do OBR and credit enhancement mechanisms interact with existing programs?
- How can we help contractors drive more demand?
- How do we work with contractors to drive more customer demand?
- Who is the target customer that finds Service Provider and Investor value propositions strong and compelling?
- Can financial incentives (e.g., rebates or incentives) and other program offerings (e.g. technical assistance) be withdrawn or reduced and replaced with financing while customer adoption of EE is driven to policy-relevant levels?
- What “leverage” does financing achieve and what savings should it appropriately be given credit for relative to other program offerings?
- Does financing promote more comprehensive retrofits than projects that don’t use financing?

Section 5d. Product & Service Providers

Service providers and the corresponding supply chain associated with selling and installing EE packages and include:

- Energy Efficiency Program Facilitators
- Engineering Firms
- Contractors (General Contractors, Home Performance and Trades)
- Energy Service Companies (ESCOs)
- Manufacturers and Distributors
- Third Party Demand Side Management Providers

Product & Service Providers Data Uses:

The following are typical questions asked by product and service providers to better understand the market size and commercial opportunity for energy efficiency financing services.

- Do contractors feel comfortable explaining different financing products to their customers? If not, what would help?
- What aspects of the financing product make it easier to close deals (i.e. Instant approval, low FICO, etc.)?
- How can I find more customers for my product or service?

- How can I make it as convenient as possible for them to buy my product or service?
- How can I help them understand the opportunities for their building/asset?
- What financing options are a good fit for my product or service?
- What do I need to do in order to help my customer qualify for financing and utility rebates and/or incentives?

Section 5e. Property Asset Manager and/or Energy Customer

The following organization types are primary beneficiaries of energy efficiency financing projects include:

- Building Owners
- Building Managers
- Building Occupants
- Real estate portfolio managers
- Property Performance Rating Systems & Appraisers

Property Asset Manager and/or Energy Customer Data Uses:

Data uses here cover:

- Why should I pursue energy efficiency and what are the benefits?
- What are the time, effort and costs resources associated with pursuing energy efficiency?
- What return on investment can I expect?
- What if the project does not achieve the expected savings?
- What should I expect for financing term, interest rate, off balance sheet, etc.?

Section 6. Data Sources and Collection

A major element of this initiative is to identify sources of the data and establish a method for collecting the data. The WG proposes a method for transferring energy efficiency financing data for purposes of program implementation, evaluation and policymaking. The IOUs would provide individual billing cycle/history and energy consumption data to the Master Servicer and continue to provide consumption data throughout the term of the financing. The FIs would provide the individual borrower, property, project and financial instrument data to the Master Servicer. The FIs would continue to provide servicing data throughout the term of the financing.

The FIs would be able to utilize billing history and energy consumption data to underwrite the loan.

If the project qualifies for a utility rebate and/or incentive, project-related data, such as data regarding the property, the proposed EE project, estimated project savings, installation data and other data about the project collected and compiled by the utility in processing the project

may be provided to the database, consistent with customer confidentiality and the confidentiality of any utility proprietary data.

All datasets and transfers will be subject to appropriate customer notification and authorization and other confidentiality agreements and security procedures implemented by each entity collecting and providing access to the data. Data will be transferred in a format acceptable to the IOUs, FIs and the Master Servicer. The transferred data will be subject to security protections and other appropriate protocols and agreements to protect privacy and commercially sensitive information.

Section 7. Proposed Data Access and Use By CHEEF

In CPUC-approved EE finance programs, as appropriate to the particular design of the programs, utility customer-specific data will be collected and used subject to prior, express written authorization of the customer, allowing the release of the customer's financial, installation, energy consumption, and billing history data to the CHEEF and the Master Servicer, solely for purposes related to the particular EE finance programs. Anonymized and/or aggregated data may be released to the public, subject to reasonable security procedures and protection against unauthorized collection, use or disclosure of customer-specific or proprietary data.

Section 8. Data “Anonymization”

Customers will utilize existing IOU Customer Information Standardized Request (CISR) forms, or similar releases, to release project-specific EE data to the CHEEF. FIs will use their own forms or procedures to release financing-related data to the CHEEF. Because the methods for appropriately anonymizing and/or aggregating data for public access have not yet been determined and are pending in the CPUC's Energy Data Center proceeding, the methodology to be used for protecting the privacy and confidentiality of customer data will be subject to the outcome of the proceeding and other applicable laws and requirements.

Section 9. Collaboration - Integrating Data from California Program and National Data Initiatives

There are numerous energy data initiatives including U.S. Department of Energy (DOE), U.S. Environmental Protection Agency (EPA), Energy Star Portfolio Manager, U.S. Department of Housing and Urban Development (HUD), Fannie Mae, the Environmental Defense Fund (EDF), Home Performance, ARRA programs, California Energy Commission (CEC), the IOU OBF programs and the CPUC that are seeking to make building and project energy data available to

serve various use cases. However, not all of these initiatives have completed their schema (data dictionary and transfer protocols), platform designs (database and automated program interfaces), data security protocols and the dates at which they intend to become fully operational are uncertain. The WG proposes that the California EE Finance initiative continue to collaborate with these energy data Initiatives and seek to coordinate the established data elements and definitions developed by California and these data initiatives, so that the datasets will be compatible among all of these programs.

Appendix

Proposed Residential and Non-Residential Data Elements

The following list of data elements was developed by the WG based on input from the Fannie Mae Energy Loan Program, Renewable Funding, participants in the Data Workshop (November 13, 2013), and various FIs and other stakeholders.

Residential and Non-Residential: Borrower, Financial Instrument, Property, Project and Financial Instrument Performance Data Provided by the FIs			
Date of this report:			
Source of this report:			
Field Name	Res (R), Non-Res (NR) or Both	Input Instructions	Required (R) vs Optional (O)
Borrower			
Type	Both	Res, non-res	R
Sub-type	Both	Single family code, commercial code	R
Phone number	Both		R
Phone type	Both		R
Contact e-mail	Both		R
Financial Instrument			
Financial instrument account number	Both	FI account number(s)	O
Financial instrument type	Both	Loan, lease, ESA, etc.	R
Field Name	Res (R), Non-Res	Input Instructions	Required (R) vs

	(NR) or Both		Optional (O)
Debt or service agreement	Both	Debt (principle and interest) vs service (operating lease, etc.)	R
Total amount funded	Both		R
Payments per year	Both	Monthly, Bi-Monthly, etc.	R
Periodic payment amount	Both		R
Total years (term)	Both		R
Borrower FICO	R		R
Co-Borrower FICO	R		R
Debt service coverage	NR		O
If debt...			R
Interest rate	Both		R
Annual Percentage Rate (APR)	Both		R
Household income	R		R
Household debt	R		R
Debt to income ratio	R		R
Project Property			
Building type	Both	List to be provided	R
Program type	Both	New, Replace On Burn-out (ROB), Early Replacement (RET)	R
Address	Both		R
City	Both		R
State	Both		R
Zip	Both		R
Utility meter(s) associated w/ property	Both		R
Utility account number(s) associated w/ property	Both		R

Field Name	Res (R), Non-Res (NR) or Both	Input Instructions	Required (R) vs Optional (O)
Financial Instrument Performance			
Current	Both		R
Prepaid amount	Both		R
Pre-paid in full	Both		R
30-59 day DQ	Both		R
Times in 30 day DQ	Both		R
60 - 89 day DQ	Both		R
Times in 60 day DQ	Both		R
90 - 120 day DQ	Both		R
Times in 90 day DQ	Both		R
Reason for DQ	Both		O
Loan modification	Both		O
In default	Both		R
Reason for default	Both		O
Charged-off	Both		R
Charged-off amount	Both		R
Charge-off recovery amount	Both		R
BK	Both		O
Reason for BK	Both		O
Utility service provided by	Both		R
Utility account number	Both		R
Project			
Reason for project	Both	Energy savings, comfort, failed equipment, etc.	R
Rebate/incentive program(s) used	Both		R
1. Rebate/incentive amount(s)	Both		R
2. Financed amount	Both		R

Field Name	Res (R), Non-Res (NR) or Both	Input Instructions	Required (R) vs Optional (O)
3. Out-of-pocket amount	Both		R
Total project amount (1+2+3)	Both		R
Number of units installed	Both		R
Installation date	Both		R
Installed technology #1	Both	e.g., HVAC	R
Level a	Both	e.g., air conditioning	R
Level b	Both	e.g., SEER	R
Installed technology #2	Both	e.g., HVAC	R
Level a	Both	e.g., air conditioning	R
Level b	Both	e.g., SEER	R
Whole Home Energy Efficiency Project	R	Yes/No	R
Estimated savings	Both	% or Not available	O
Methodology to estimate savings	Both	Energy Pro, Etc.	O
Estimated cost of saved kWh	Both	Total installed cost divided by units saved	O
Estimated cost of saved Therm	Both	Total installed cost divided by units saved	O
Contractor name	Both		R
Contractor certifications	Both	e.g., professional engineer, etc.	O*
Contractor license number	Both		R*
Approximate age of property	Both		R
Approximate square footage of property	Both		R

* This data is optional if provided by Utilities

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

1st Light Energy	Douglass & Liddell	OnGrid Solar
AT&T	Downey & Brand	Pacific Gas and Electric Company
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Praxair
Anderson & Poole	G. A. Krause & Assoc.	Regulatory & Cogeneration Service, Inc.
BART	GenOn Energy Inc.	SCD Energy Solutions
Barkovich & Yap, Inc.	GenOn Energy, Inc.	SCE
Bartle Wells Associates	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Braun Blasing McLaughlin, P.C.	Green Power Institute	SPURR
California Cotton Ginners & Growers Assn	Hanna & Morton	San Francisco Public Utilities Commission
California Energy Commission	In House Energy	Seattle City Light
California Public Utilities Commission	International Power Technology	Sempra Utilities
California State Association of Counties	Intestate Gas Services, Inc.	SoCalGas
Calpine	K&L Gates LLP	Southern California Edison Company
Casner, Steve	Kelly Group	Spark Energy
Cenergy Power	Linde	Sun Light & Power
Center for Biological Diversity	Los Angeles Dept of Water & Power	Sunshine Design
City of Palo Alto	MRW & Associates	Tecogen, Inc.
City of San Jose	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
Clean Power	Marin Energy Authority	TransCanada
Coast Economic Consulting	McKenna Long & Aldridge LLP	Utility Cost Management
Commercial Energy	McKenzie & Associates	Utility Power Solutions
County of Tehama - Department of Public Works	Modesto Irrigation District	Utility Specialists
Crossborder Energy	Morgan Stanley	Verizon
Davis Wright Tremaine LLP	NLine Energy, Inc.	Water and Energy Consulting
Day Carter Murphy	NRG Solar	Wellhead Electric Company
Defense Energy Support Center	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Dept of General Services	North America Power Partners	
Division of Ratepayer Advocates	Occidental Energy Marketing, Inc.	