

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 8, 2014

Advice Letters: 4361-E & 4361-E-A

Brian Cherry
Vice President, Regulation and Rates
Pacific Gas and Electric Company
P.O. Box 770000
San Francisco, CA 94177

**SUBJECT: MODIFICATIONS TO DIRECT PARTICIPATION DEMAND RESPONSE RULE 24
AND RELATED DOCUMENTS IN COMPLIANCE WITH RESOLUTION E-4630**

Dear Mr. Cherry:

Advice Letters 4361-E & 4361-E-A are effective as supplemented of March 3, 2014.

Sincerely,

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

Edward Randolph
Director, Energy Division

April 2, 2014

Advice 4361-E-A
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Supplement: Modifications to Direct Participation Demand Response Rule 24 and Related Documents in Compliance with Resolution E-4630

PG&E hereby submits for filing the following changes to its tariffs. The revised tariff sheets are listed on Attachment 1 and are attached hereto. For administrative convenience, a new set of Rule 24 tariff sheets are being attached. Please discard the previously submitted Rule 24.

Purpose

The purpose of this Advice filing is to make changes to tariff sheets originally contained within Advice 4361-E, filed on February 18, 2014. These changes are made in accordance with General Order (GO) 96-B, General Rules 7.5.1, which authorizes utilities to make additional changes to an Advice filing through the filing of a supplemental advice letter.

This advice filing supplements in part and does not change the substance of the Advice 4361-E.

Proposed Tariff Changes

1. Rule 24

- Non-substantive edits as directed by Energy Division.

2. Form 14-941 - CISR-DRP Form

- Replaced reference to Third-Party DRP to Non-Utility DRP.

The filing would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

PG&E requests that the Commission, pursuant to GO 96-B, General Rule 7.5.1, re-open the protest, but limit the protest period to only 5 business days¹. The modifications included in this supplemental advice filing do not make substantive changes that would affect the overall evaluation of the filing.

Effective Date

PG&E requests that this supplemental Tier 1 advice filing become effective on March 3, 2014.

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 R.07-01-041, R.13-09-011 and A.11-03-001. 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>



Vice President, Regulatory Relations

Attachment 1: Electric Rule No. 24 Tariff
Electric Sample Form 79-1152 – Form CISR-DR

cc: Service List R.07-01-041
Service List R.13-09-011
Service List A.11-03-001

¹ The Energy Division approved 3-day protest period concludes on a weekend. PG&E is hereby moving this date to the following business day.

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 and PGETariffs@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) #: **4361-E-A**

Tier: **1**

Subject of AL: **Supplement: Modifications to Direct Participation Demand Response Rule 24 and Related Documents in Compliance with Resolution E-4630**

Keywords (choose from CPUC listing): Compliance, Rules, Forms and Demand Side Management

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution E-4630

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: No

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: _____

Resolution Required? Yes No

Requested effective date: **March 3, 2014**

No. of tariff sheets: 33

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: New Rule 24 and Form 79-1152

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 5 days¹ after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company
Attn: Brian Cherry
Vice President, Regulatory Relations
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

¹ The Energy Division approved 3-day protest period concludes on a weekend. PG&E is hereby moving this date to the following business day.

**ATTACHMENT 1
Advice 4361-E-A**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
33694-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 1	33506-E
33695-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 2	33507-E
33696-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 3	33508-E
33697-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 4	33509-E
33698-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 5	33510-E
33699-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 6	33511-E
33700-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 7	33512-E
33701-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 8	33513-E
33702-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 9	33514-E
33703-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 10	33515-E
33704-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 11	33516-E
33705-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 12	33517-E

**ATTACHMENT 1
Advice 4361-E-A**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
33706-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 13	33518-E
33707-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 14	33519-E
33708-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 15	33520-E
33709-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 16	33521-E
33710-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 17	33522-E
33711-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 18	33523-E
33712-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 19	33524-E
33713-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 20	33525-E
33714-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 21	33526-E
33715-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 22	33527-E
33716-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 23	33528-E
33717-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 24	33529-E

**ATTACHMENT 1
Advice 4361-E-A**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
33718-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 25	33530-E
33719-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 26	33531-E
33720-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 27	33532-E
33721-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 28	33533-E
33722-E	ELECTRIC RULE NO. 24 DIRECT PARTICIPATION DEMAND RESPONSE Sheet 29	33534-E
33723-E	ELECTRIC SAMPLE FORM 79-1152 AUTHORIZATION OR REVOCATION OF AUTHORIZATION TO DISCLOSE CUSTOMER INFORMATION TO A DEMAND RESPONSE PROVIDER UNDER RULE 24 Sheet 1	33535-E
33724-E	ELECTRIC TABLE OF CONTENTS Sheet 1	33537-E
33725-E	ELECTRIC TABLE OF CONTENTS RULES Sheet 21	33538-E
33726-E	ELECTRIC TABLE OF CONTENTS SAMPLE FORMS Sheet 26	33539-E



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 1

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- B. DEFINITIONS
- C. GENERAL TERMS
- D. ACCESS TO CUSTOMER DATA
- E. DEMAND RESPONSE PROVIDER (DRP) SERVICE ESTABLISHMENT
- F. METERING SERVICES
- G. DISCONTINUATION OF SERVICE BY DRP
- H. CREDIT REQUIREMENTS
- I. COMPLAINT AND DISPUTE RESOLUTION PROCESSES
- J. ACRONYMS

(N)

 (N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 2

A. APPLICABILITY

(N)

This Rule establishes the terms and conditions that apply to those entities, which are subject to this Rule, who wish to take part in Direct Participation Demand Response Service ("DR Service"). DR Service is offered by the California Independent System Operator (CAISO) and allows a Demand Response Provider's (DRP) or a retail customer to participate or "bid-in" directly into the CAISO wholesale energy market for compensation by the CAISO, in accordance with the market awards and dispatch instructions established by the CAISO.

DRP DR Services under this Rule are subject to the dual participation rules. As a general rule, DRPs are prohibited from registering customer accounts that are already registered with another DRP or that are participating in a PG&E event-based demand response program(s). (See Section C.2.d for detailed rules)

1. Entities and Services Subject to Rule 24

- a. PG&E acting on behalf of its customers as the Load Serving Entity (LSE), DRP, Utility Distribution Company (UDC), Meter Data Management Agent (MDMA), or Meter Service Provider (MSP).
- b. Affiliates of PG&E acting as a DRP
- c. Non-Utility affiliated DRPs enrolling PG&E Bundled Service customers.
- d. Bundled Service customers acting as a DRP for their own load.

2. Entities Not Subject to Rule 24

- a. Non-Utility DRPs enrolling only Direct Access (DA), or Community Choice Aggregation (CCA) Service customers,
- b. DA, or CCA Service customers acting as a DRP for their own load,
- c. Electric Service Providers (ESPs) and CCAs acting as a LSE for DA, or CCA Service customers,
- d. Non-Utility affiliated MDMAs and MSPs providing metering services to DA Service customers.

The descriptive headings of the various sections of this Rule have been inserted for convenience of reference only and shall in no way define, modify, or restrict any of the terms and provisions thereof.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 3

B. DEFINITIONS

(N)

Certain specific terms used in this Rule are defined below. Additional definitions for more widely used terms in PG&E's tariffs are also found in Electric Rule 1.

1. **AFFILIATE:** Any legal entity in which five percent or more of the outstanding shares are owned, controlled, or held with power to vote, directly or indirectly either by the DRP or any of its subsidiaries; or by the DRP's controlling entity or any of its subsidiaries; or by any company in which the DRP, its controlling entity, or any of the DRP's affiliates, exert substantial control over the operation of the company or indirectly have substantial financial interests in the company which is exercised through means other than ownership. For purpose of this definition, "substantial control" includes, but is not limited to, the possession, directly or indirectly and whether acting alone or in conjunction with others, of the authority to direct or cause the direction of the management or policies of the company. A direct or indirect voting interest of five percent or more by the DRP in an entity's company creates a rebuttable presumption of control.

For the purposes of this Rule, Utility affiliates participating in DR Services are considered "non-Utility DRPs".

2. **CAISO's DR Service:** The CAISO's wholesale DR market mechanism(s), market model(s), and/or market product(s) that allow retail customers' loads to be bid in to the CAISO's wholesale energy market.

3. **CAISO's DR System (DRS):** A CAISO's software application that allows a DRP or a retail customer to participate in the CAISO's wholesale energy market using the CAISO's DR Service(s). The CAISO's DRS User Guide can be found in http://www.caiso.com/Documents/DemandResponseSystem_DRS_ISOUserGuideVersion2_0.pdf

4. **DEMAND RESPONSE (DR):** The load reduction or increase by retail customers in response to a signal or pricing mechanism.

5. **DEMAND RESPONSE PROVIDER (DRP):** An entity providing DR Service(s) to one or more retail customers to bid loads on their behalf into the CAISO's wholesale market using the CAISO's DR Service(s). A DRP can also be a retail customer bidding its own load into CAISO wholesale market using the CAISO's DR Service(s).

Any of the following entities may elect to become a DRP: PG&E, non-Utility entities such as Electric Service Providers (ESPs) and Community Choice Aggregation (CCA) entities who elect to participate in CAISO DR Services with bundled service customers, a third-party who wishes to bid in bundled service accounts in the CAISO wholesale market, or a bundled service retail customer (bidding in its own load). Unless otherwise specifically stated, all references to "DRP" herein shall refer to all of these entities.

(N)

(Continued)



ELECTRIC RULE NO. 24
 DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 5

B. DEFINITIONS (CONT'D.)

(N)

- 15. **TELEMETRY:** An electric meter capable of recording, storing, and transferring the minimum data required in accordance with the CAISO's telemetry technical requirements (current technical requirements are available on the CAISO's website (at www.caiso.com)).
- 16. **UNIQUE CUSTOMER IDENTIFIER:** An identifier assigned by the UDC and entered into the CAISO's DRS by a DRP. The identifier is specific to a customer's Service Account. PG&E will assign a unique customer identifier for a customer's service account.
- 17. **UTILITY DISTRIBUTION COMPANY (UDC):** An entity that owns or operates a distribution system for the delivery of energy to and from the CAISO controlled grid. PG&E is the applicable UDC under this Rule.

Herein, the "Utility" is PG&E and it may serve one or more of the following functions: UDC, LSE, MDMA, MSP and DRP.

C. GENERAL TERMS

1. General Obligations of PG&E

a. Non-Discrimination and Competitive Neutrality

(1) Neutral Discharge of Responsibilities

PG&E, acting in any capacity described herein, shall discharge its responsibilities in a neutral manner to all DRPs. When acting as an MDMA, this would include ensuring that the meter data for each service account sent to the DRP meets the current validated, edited, and estimated (VEE) standards established in the Direct Access Standards for Metering and Meter Data (DASMMD).

Unless otherwise authorized by the California Public Utilities Commission (CPUC or Commission), the Federal Energy Regulatory Commission (FERC), or the affiliate transactions rules¹, PG&E shall not provide or represent that it will provide to itself, its affiliates or customers of itself or its affiliates any preferential treatment with regard to PG&E services than other, unaffiliated, service providers would receive, including, but not limited to, terms and conditions, information, pricing or timing.

(N)

¹ D.97-12-088, 77 CPUC 2d 422, 449, as amended by D.98-08-035, 81 CPUC 2d 607 and D.98-12-075, 84 CPUC 2d 155, D.06-06-062 and D.06-12-029.

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 6

C. GENERAL TERMS (CONT'D.)

(N)

1. General Obligations of PG&E (Cont'd.)

a. Non-Discrimination and Competitive Neutrality (Cont'd.)

(2) Non-Discriminatory Response to Requests for PG&E Services

PG&E, acting in any capacity, shall process requests for similar PG&E services in the same manner and within the same period of time for its affiliates, customers of itself and its affiliates, and for all unaffiliated market participants and their respective customers. PG&E shall provide non-discriminatory access to its meter data, where available, to third-party DRPs when authorized by customer. In particular, PG&E shall not have any greater access to meter data for the purposes of fulfilling its DRP duties and obligations than does a third-party DRP.

(3) Competitive Neutrality

Confidential, competitive information received by PG&E from unaffiliated DRPs, or from the CAISO about the DRPs or their customers, in connection with PG&E's performance of its duties to implement and administer the DRP's use of PG&E's bundled load for DR Services shall be limited to PG&E staff who are responsible for performing PG&E's non-DRP responsibilities under this Rule. Such confidential, competitive information shall not be used to promote PG&E's services to its customers or customers of its affiliates.

PG&E staff receiving such confidential, competitive information from the DRPs or the CAISO in the discharge of PG&E's roles and responsibilities as a non-DRP shall not share such confidential, competitive information with other individuals in PG&E who are also responsible for discharging PG&E's roles and responsibilities as a DRP under this Rule.

b. Timeliness and Due Diligence

Consistent with state law and CPUC decisions, PG&E acting in any capacity shall exercise due diligence in meeting its obligations and deadlines under this Rule so as to facilitate a customer's election to participate in a DRP's DR Service in CAISO's wholesale markets as quickly as possible.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 7

C. GENERAL TERMS (CONT'D.)

(N)

1. General Obligations of PG&E (Cont'd.)

c. Review of DRP Resource Registrations in the CAISO's DR System

PG&E, acting as an LSE, shall review all Resource Registrations (within its electric service territory) submitted by a DRP to the CAISO's Demand Response System (DRS) as defined in the CAISO tariff. PG&E's review shall be limited to ensure accuracy of the customer information presented and that the customer isn't otherwise participating in a PG&E event based demand response program at the same time period. PG&E shall also review Resource Registrations for Entities not subject to this Rule in the same manner contained in this subsection and on the same non-discriminatory basis.

PG&E will conduct such review in accordance with the timelines set forth in the CAISO's Business Practice Manuals (BPMs). PG&E shall notify the CAISO and the DRP within ten (10) business days if the customer information presented in the Resource Registration is inaccurate, if the DRP is not appropriately registered for DRP DR Services at the CPUC, and confirm that the customer service account placed in the Resource Registration does not conflict with the dual participation rules in Section C.2.d To the extent reasonable and feasible, PG&E and the DRP shall coordinate and cooperate to ensure an accurate Resource Registration.

d. Provision of Customer Data by PG&E

In response to a completed, customer authorized submittal of PG&E's Form 79-1152 (CISR-DRP) by a customer or non-Utility DRP, PG&E shall in a timely fashion provide the required information to the DRP to facilitate a customer's enrollment in a DRP DR Service(s). This information will be provided in accordance with Section D of this Rule. The DRP or customer may also request the provision of continuous meter data or designate how continuous data release shall be terminated.

e. PG&E Tariffed Demand Response Programs

For those customers enrolled in a PG&E event-based demand response program, PG&E will act as the customer's DRP if PG&E elects to submit the customer into the CAISO's DRS. This customer could be a PG&E Bundled Service, Direct Access, or Community Choice Aggregation Service customer.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 8

C. GENERAL TERMS (CONT'D.)

(N)

1. General Obligations of PG&E (Cont'd.)

f. KYZ Pulse Installations

Upon the request of and payment by the customer or its agent, PG&E, acting as the MSP, shall install where feasible a KYZ pulse initiating device or another acceptable telemetry solution. A DRP may, with the permission of the CAISO, use the information from such a device to submit preliminary settlement data to the CAISO. The customer or its DRP will be responsible for the cost of the installation.

If the customer wishes to terminate the delivery of its KYZ pulse data to the DRP at any time, the DRP will take action, upon receipt of notification from the customer, to discontinue data transmission from its facilities, as soon as practicable, but no later than 45 days after customer notification of termination, to allow for financial settlements to occur.

2. General Obligations of DRPs Enrolling Bundled Service Customers

This Section is applicable to all DRPs enrolling Bundled Service customers, unless otherwise specified. Requirements for PG&E, acting as the DRP for DA, CA and CCA Service customers, are specified in Section D.

a. Timeliness and Due Diligence

DRPs shall exercise due diligence in meeting their obligations and deadlines under this Rule so as to facilitate customer enrollment in DRP DR Service in a timely manner. To the extent ordered by the CPUC, DRPs shall make all payments resulting from CPUC-authorized charges owed to PG&E for services specified under this Rule in a timely manner subject to applicable payment dispute provisions.

b. Arrangements Between DRPs and Their Customers

DRPs shall be solely responsible for having appropriate contractual or other arrangements with their customers necessary to implement DRP DR Service consistent with all applicable laws, CAISO requirements, CPUC requirements, if any, and this Rule.

c. Scheduling Coordinator (SC)

In accordance with the CAISO's tariff, a DRP must become or contract with a SC prior to registering customers into a CAISO's Demand Response System. PG&E shall not act as an SC on behalf of a non-Utility DRP. The DRP must obtain its own SC to participate in DR Services or otherwise qualify to act in that capacity.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 9

C. GENERAL TERMS (CONT'D.)

(N)

2. General Obligations of DRPs Enrolling Bundled Service Customers (Cont'd.)

d. Dual Participation

DRPs are prohibited from placing a customer's service account into a Resource Registration in the CAISO's Demand Response (DR) System for any time period within the Start Date and End Date of another DRP's Resource Registration that already includes the customer's service account and that has been given a "Confirmed" status by the CAISO under its rules and procedures.

Non-Utility DRPs are also prohibited from enrolling and registering a customer service account in DR Services if the customer is already enrolled in a PG&E event-based demand response program. The customer can disenroll from the PG&E program at any time if it withdraws to enroll in a DRP service.

When a DRP is notified by PG&E via its CISR-DRP process that a customer is already enrolled in a PG&E event-based DR program, it is the notified DRP's obligation to ensure that the customer has disenrolled from PG&E's event-based demand response program before placing the customer service account in the notified DRP's Resource Registration in the CAISO's DR System for the same period. The effective date to disenroll that customer from its current program to enroll it in DRP's DR Service will be established in accordance with PG&E's demand response program rules and its Electric Rule 12.

In the event of a conflict between PG&E's DR program specific requirements and its Electric Rule 12, the program's tariff requirements will apply.

For instance, a customer who is currently participating in a PG&E event-based demand response program and wishes to enroll with a non-Utility DRP DR Service must first disenroll from PG&E's program. Disenrollment will be subject to any contractual or program obligations currently in effect with PG&E's demand response program.

Similarly, if a customer is currently registered at the CAISO for DR Services, that customer must be disenrolled prior to that customer's participation in either another DRP's Resource Registration or a PG&E event-based demand response program. However, a DRP is not prohibited from also enrolling and registering its own customers for other DR Service(s) that it offers. It is the DRP's obligation to ensure the DRP's Resource Registrations do not conflict with the CAISO rules on DR Services.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 10

C. GENERAL TERMS (CONT'D.)

(N)

2. General Obligations of DRPs Enrolling Bundled Service Customers (Cont'd.)

d. Dual Participation (Cont'd)

Customers enrolled in PG&E's Peak Day Pricing program will be automatically disenrolled from the program upon a non-Utility DRP Resource Registration that includes the customer service account and that has been given a "Confirmed" status by the CAISO. Under PG&E's Electric Rule 12, the earliest disenrollment date for Peak Day Pricing is the customer's next meter read date. Therefore, the Start Date of a non-Utility DRP Resource Registration for the customer service account that is enrolled in Peak Day Pricing should be on the next or future meter read date.

PG&E shall provide a one-digit meter read cycle letter to the non-Utility DRP via Form 79-1152 (CISR-DRP) as also described in Section D.1.a. It is the DRPs' obligation to use the cycle letter and match it for the customer service account's next or future meter read date(s) from PG&E's meter reading schedules. PG&E's meter reading schedules can be found in <http://www.pge.com/myhome/customerservice/smartmeter/analogmeters/schedule/>.

If a customer is a residential or small commercial customer, non-Utility DRPs shall notify the customer prior to the Resource Registration in the CAISO DR System through the Customer Notification Form Letter, required in Section C.7, that the customer will be disenrolled from Peak Day Pricing and may lose bill protection, if applicable.

When PG&E is acting as a DRP, it is obligated to ensure that the customer has disenrolled from non-Utility DRP's DR Service before enrolling the customer in its own event-based program.

e. Resource Registration of DR Resources at the CAISO

DRPs shall be solely responsible for registering DR resources at the CAISO with the customers to whom they are providing DR Services.

f. Notification of Customer Enrollment in DR Service

The CAISO, through its registration process, will make available to PG&E, as an LSE, the ability to verify its customers' enrollment status and other information pertinent to their customers' participation in DR Services. DRPs shall not be responsible for providing separate notification to PG&E of an enrollment of a customer in DR Services.

(N)

(Continued)



ELECTRIC RULE NO. 24
 DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 11

C. GENERAL TERMS (CONT'D.)

(N)

2. General Obligations of DRPs Enrolling Bundled Service Customers (Cont'd.)

g. Utilizing the MDMA for Revenue Quality Meter Data

DRPs shall utilize the MDMA chosen by the customer (or the customer's LSE) for gaining access to Revenue Quality Meter Data (RQMD).

h. Utilizing the MDMA for Settlement Quality Meter Data

The MDMA shall be responsible and liable to send timely and accurate individual customer RQMD to the DRP, or its designated agent, who shall convert this data to Settlement Quality Meter Data (SQMD) and send it to its Scheduling Coordinator (SC). (See Section F.2 for detailed rules)

For Direct Access customers, DRPs may contract with the MDMA chosen by the customer (or the customer's LSE) for submitting SQMD to the DRP's SC.

i. Access to Electronic Data by non-Utility DRP

For non-Utility DRPs electing to use PG&E's Electronic Data Interchange (EDI) functionality when PG&E serves as an MDMA, PG&E shall provide these DRPs with access to the appropriate electronic platform (e.g. the MDMA server) to facilitate energy data exchanges required for DRP's DR service(s). The requirements for such access are found in Section E.4 below.

j. Net Benefits Test

All DRPs bidding Bundled Service customer's load into the CAISO's wholesale energy market using the CAISO's DR Service(s) must submit bids that are at or above the Net Benefits Test described in Section 30.6.3 of CAISO's Fifth Replacement FERC Electric Tariff.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 12

C. GENERAL TERMS (CONT'D.)

(N)

3. Transfer of Cost Obligations Between DRPs and Customers

Nothing in this Rule is intended to prevent DRPs and customers from agreeing to reallocate between them any costs for DRPs DR Services that are subject to this Rule to be paid by either of them.

4. LSE Is Not Liable for DRP DR Services

To the extent the customer takes service from a DRP, the customer's LSE has no obligations to the customer with respect to the services provided by the DRP.

5. DRP is Not Liable for LSE's Services

The DRP has no obligations to the customer with respect to the services provided by that LSE. The customer must look to its LSE, not the DRP, to carry out the responsibilities associated with those services.

6. Split Loads Not Allowed

Customers requesting DRP DR Service may not partition the electric loads of a service account among different DRPs at any one time. The entire load and load reduction for a service account can be registered in the CAISO's DRS to only one DRP at any one time.

7. Formal Notification for Residential and Small Commercial Customers

Residential customers are defined as PG&E customers who are eligible for service under one of its residential rate schedules. Small Commercial customers are defined as any non-residential customers with a maximum billing peak demand of less than 20 kilowatt (kW). Non-Utility DRPs intending to enroll Residential and Small Commercial customers in DR Services are required to meet additional CPUC requirements before submitting such customer service accounts for Resource Registration at the CAISO DR System. These DRPs must obtain approval from the CPUC's Energy Division for a Customer Notification Form Letter (Form Letter), in hard copy or electronic form, to be provided to each customer explaining the DRP's terms and conditions of participating in the DRP's DR Service. If the customer is enrolled in PG&E's Peak Day Pricing program, the Form Letter shall also provide the estimated disenrollment date from Peak Day Pricing and that the customer may lose bill protection, if applicable. The disenrollment date shall be on the customer's next or future meter read date (see Section C.2.d)

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 13

C. GENERAL TERMS (CONT'D.)

(N)

7. Formal Notification for Residential and Small Commercial Customers (Cont'd.)

The non-Utility DRP must provide the Form Letter to the customer before placing its service account in a DRP's Resource Registration in the CAISO DR System. The Form Letter shall provide any grace period in which the customer can cancel the DR Service enrollment without any charges or penalties.

8. Master Metered Customers

Master metered customers who provide sub-metered tenant billings may participate in DRP DR Service as only a single master service account. A master-metered customer may not partition the electric loads of a single master meter among several DRPs.

9. Service Fees and Other Charges

PG&E may incur costs in order to facilitate a non-Utility DRPs' participation in CAISO's DR Services. Any fees to reimburse PG&E for these costs are described in PG&E rate Schedule E-DRP and must be paid on a timely basis to ensure service under this Rule.

(N)

(Continued)



ELECTRIC RULE NO. 24
 DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 14

D. ACCESS TO CUSTOMER DATA

(N)

1. Access to Customer Usage Data – Release of Information to non-Utility DRPs

PG&E will provide confidential customer-specific information and usage data for a bundled, DA or CCA service customer to parties specified by that customer, subject to PG&E's Rule 27, and the following provisions:

- a. The inquiring party must have customer authorization using Form CISR-DRP before a customer's personally identifiable information can be released. The information, upon such authorization, will be released only to the inquiring party, unless otherwise authorized by the customer, as part of the Form CISR-DRP process. The inquiring party as the recipient of this data agrees to abide by the applicable Commission customer privacy requirements. For the purposes of this program, the Form CISR-DRP shall permit the customer to authorize the following:
 - (1) Customer Service Account information, including service address and rate schedule.
 - (2) Up to 1 year worth of historical interval data, as it is available.
 - (3) Unique Customer Identifier to track customer service account in CAISO DR Systems. This information will be provided to the customer's Load Serving Entity (LSE) too if different from PG&E. (4) Customer Account information, including service address and rate schedule.
 - (4) Customer one-digit meter read cycle letter for purposes of verifying Meter Read Date and date to begin DR Service.

The customer may also elect to authorize the release of the following information to the non-Utility DRP via the Form CISR-DRP (Form 79-1152):

- (5) Ongoing monthly interval usage data
- (6) A maximum of the most recent twelve (12) months of customer billing data or the amount of data recorded for that specific service account.
- b. When a CISR-DRP is received, PG&E shall also transmit the following data, defined as Confidential Information in the DRP Service Agreement (Form 79-1160), to the non-Utility DRP:
 - (1) Confidential end-user information such as customer's service voltage, the sub-Load Aggregation Point (sub-LAP) and Pricing node (Pnode), the identity and contact information of customer's LSE, MDMA and MSP.

(N)

(Continued)



ELECTRIC RULE NO. 24
 DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 15

D. ACCESS TO CUSTOMER DATA (CONT'D.)

(N)

1. Access to Customer Usage Data – Release of Information to non-Utility DRPs (Cont'd)

b. When a CISR-DRP is received, PG&E shall also transmit the following data, defined as Confidential Information in the DRP Service Agreement (Form 79-1160), to the non-Utility DRP (Cont'd):

(2) PG&E's demand response program(s) and tariff schedule(s) in which the service account(s) are currently enrolled and the estimated date of when the customer may be eligible to participate in DR Service without direct financial consequence from PG&E. Applicable PG&E demand response tariffs include: PG&E's Schedule(s) E-RSAC, E-CSAC, E-DBP, E-SLRP, E-OBMC, E-CBP, E-RSMART, E-BIP and PG&E's Aggregator Managed Portfolio (AMP). PG&E will also indicate if account(s) listed above is participating in the Peak Day Pricing option of its applicable rate schedule.

PG&E shall also provide information, as it is available, on the earliest eligible date(s) on which customer can leave its current program without any contractual or program obligations under the terms and conditions of the tariff that may result in financial or tariff implications such as but are not limited to, losing bill protection or incentive payments, return of received incentives, and/or penalties.

(3) Basic meter information including the meter number, the type of meter and the intervals currently being collected by the meter.

c. Customer information specified in Sections D.1.a.(1-3) will be released to the customer or its authorized agent up to two (2) times per year per service account at no cost to the requesting party. Thereafter, PG&E may have the right to assess a processing charge as approved by the CPUC. Customer data specified in Section D.1.a.(5) will be released to the customer or its authorized agent on an ongoing basis at charges authorized by the CPUC, unless provided through electronic means, as outlined in Metering Services, Section F.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 16

D. ACCESS TO CUSTOMER DATA (CONT'D.)

(N)

1. Access to Customer Usage Data – Release of Information to non-Utility DRPs (Cont'd)

- d. Durations by which the non-Utility DRP may continue to receive access to a customer's information shall be specified by the customer in the CISR-DRP. The customer may choose from the following options: (1) indefinite data release until otherwise canceled by the customer, (2) release of data until a date certain, (3) authorization for non-Utility DRP to terminate data release upon DRP DR Service cancellation. If the customer makes no election, Utility will assume that customer authorization is for an indefinite period of time per CPUC Resolution E-4599.

In the event that the customer, not the non-Utility DRP on the customer's behalf, revokes access to customer meter data, PG&E shall provide the non-Utility DRP with immediate notice of the revocation.

Under Option (3), it is the non-Utility DRP's responsibility to notify PG&E to terminate the non-Utility DRP's access to the customer's data. Upon receipt of the notice of termination from the non-Utility DRP or the revocation of data access authorization from the customer, PG&E will cease to provide the customer on-going interval usage data to the non-Utility DRP. However, the non-Utility DRP may continue to receive previously generated data that pertains to the period of time during which customer authorization was valid. This information will assist the non-Utility DRP in settling invoices with the CAISO related to customer service accounts during the time that they were active in DR Services.

- e. When PG&E is acting as the MDMA, if daily meter data is available through PG&E's portals, the daily meter data will not be RQMD. RQMD data will be available on a monthly basis. When Open ADE is available to PG&E, the tariff for Open ADE will govern the provision of daily meter data.

2. Access to Direct Access or CCA Service Customer Data when PG&E is the DRP but not the MDMA

- a. PG&E, in its role as a DRP, will contract with the customer's MDMA in order to receive the necessary meter data (as described in Section F) for the purposes of managing its own DRP DR Services program, and to assist in its forecasting, bidding, dispatch, and settlement activities.

3. Customer Inquiries Concerning Billing-Related Issues

- a. Customer inquiries concerning PG&E's charges or services should be directed to PG&E.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 17

D. ACCESS TO CUSTOMER DATA (CONT'D.)

(N)

- 3. Customer Inquiries Concerning Billing-Related Issues (Cont'd)
 - b. Customer inquiries concerning the non-Utility DRP's charges or services should be directed to the non-Utility DRP.
 - c. Customer inquiries concerning the LSE's charges or services should be directed to the LSE.
- 4. Customer Inquiries Related to Emergency Situations and Outages
 - a. PG&E will be responsible for responding to all inquiries related to distribution service, emergency system conditions, outages, and safety situations. Customers contacting the DRP with such inquiries should be referred directly to PG&E.
 - b. It may be necessary for PG&E to shed or curtail customer load at the request of the CAISO, or as otherwise provided by CPUC authorized tariffs. PG&E shall provide notice to the non-Utility DRP of such curtailments as soon as practical, however PG&E is not responsible to notify the non-Utility DRP's Scheduling Coordinator. Nothing in this rule shall change the criteria for load-shedding established by the CAISO, the CPUC, or PG&E's operation procedures.
 - c. PG&E shall continue to be responsible for implementing its own CPUC-approved DR programs.

E. DRP DR SERVICE ESTABLISHMENT

DRPs enrolling bundled service customers must satisfy the following regulatory requirements, as they might apply, before the DRP can provide DRP DR Services in PG&E's service territory.

- 1. CPUC Registration Requirements
 - a. Execute a Demand Response Provider Service Agreement (DRP Service Agreement – Form No 79-1160) with PG&E.
 - b. Satisfy PG&E's credit requirements as specified in Section H.
 - c. Register with the CPUC and maintain a valid DRP registration at the CPUC

(N)

(Continued)



ELECTRIC RULE NO. 24
 DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 18

E. DRP DR SERVICE ESTABLISHMENT (CONT'D)

(N)

1. CPUC Registration Requirements (Cont'd)

- d. Complete the CPUC DRP Registration Application Form. DRPs enrolling PG&E's residential and small commercial customers shall also provide the CPUC a performance bond under the name of the CPUC as a security deposit or financial guarantee bond in the amount of pursuant to the matrix below and as specified in the CPUC Registration form.

Number of Customers	Security Deposit Amount
1 – 2,500	\$25,000
2,501 - 5,000	\$50,000
5,001 – 10,000	\$75,000
10,001 +	\$100,000

2. CAISO Requirements

All DRPs enrolling PG&E Bundled Service customers must:

- a. Execute the necessary service agreements for registering resources with the CAISO.
- b. Meet all CAISO's requirements for the DRP and maintain their registration at the CAISO as a qualified DRP.

3. Maintenance of DRP Registration at the CPUC

- a. The CPUC will post the list of registered DRPs on its website. The CPUC will enforce all rules for the DRP registration and may suspend or revoke a DRP registration if the CPUC determines that the DRP violated Rule 24 or terms and conditions outlined in the CPUC DRP Registration Form. The CPUC may require that the DRP periodically renew its registration to maintain its status.
- b. The CPUC will investigate complaints relative to DRP activities and may suspend or revoke a DRP registration if a civil or business court, or the CPUC, finds that the DRP has engaged in activities that warrant such action, after appropriate due process considerations. The CPUC may also allow the DRP to cure any identified deficiencies or inappropriate activities within a reasonable period of time.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 19

E. DRP DR SERVICE ESTABLISHMENT (CONT'D)

(N)

3. Maintenance of DRP Registration at the CPUC (Cont'd)

- c. DRPs shall keep the CPUC registration information up to date.

4. EDI Requirements

Until superseded by another data exchange process, such as Open ADE, and to the extent the DRP elects to use Electronic Data Interchange (EDI) or analogous platform to communicate with PG&E for DRP DR Service implementation, the DRP must satisfy applicable technical requirements, including, without limitation:

- a. A DRP must complete all necessary electronic interfaces for the DRP and PG&E to communicate meter reading and usage data.
- b. The DRP must have the capability to exchange data with PG&E via the Internet. Alternative arrangements to EDI may be allowed if mutual agreement is made between PG&E and the DRP.
- c. The DRP must have the capability to perform EDI transactions, and enter into appropriate agreements related thereto.

F. METERING SERVICES

Metering Services are comprised of three primary functions: Meter Ownership, Meter Services (installation, maintenance, and testing), and MDMA services. Each participating DRP DR Service customer must have an interval meter capable of meeting CAISO DR Service requirements being read remotely by PG&E when acting in its capacity as MDMA.

1. Meter Changes

If a meter change is required to participate in DRP DR Services (i.e. the existing meter is not an appropriate interval meter), and PG&E is the MSP, the customer and DRP have choices for how to proceed:

- a. The customer may be scheduled to receive an interval meter as part of PG&E smart meter deployment. In this instance, the customer and DRP can elect to begin DRP DR Services after PG&E completes its deployment of PG&E smart meters and is able to provide the required interval data.
- b. If an interval meter with a shorter measurement duration is desired, and such a meter and metering service related back-office capability are readily available from PG&E, PG&E will provide this meter at an additional CPUC-approved fee.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 20

F. METERING SERVICES (CONT'D.)

(N)

1. Meter Changes (Cont'd.)

b. (Cont'd.)

- (1) For Bundled Service and CCA Service accounts with a maximum demand of 200 kW or greater for at least one month in the past 12 billing months, PG&E will provide and install the metering and communication equipment at no cost to the customer.
- (2) For Bundled Service and CCA Service accounts whose maximum billed demand has not exceeded the level specified in item 1 above, the customer can elect one of the following;
 - i. Pay the cost to have PG&E install an appropriate interval meter that is not a SmartMeter interval meter at the customer's expense pursuant to Electric Rule 2, Special Facilities, or
 - ii. If the PG&E SmartMeter requirements meet CAISO DR Services metering standards, wait until a PG&E SmartMeter is installed and remote-read enabled.

- c. For Direct Access service accounts where PG&E is the Meter Data Management Agent (MDMA), no incremental fees under this rule are required. Metering services shall be provided pursuant to Electric Rule 22.
- d. For Direct Access service accounts where PG&E is the MSP but not the MDMA, then the customer will be responsible for any and all costs associated with providing acceptable interval data to the DRP, including costs for any additional metering, communication equipment, and fees assessed by the customer's Electric Service Provider (ESP).
- e. PG&E is not required to install an interval meter and communication equipment or SmartMeter to provide remote read capability if the installation is impractical or not economically feasible
- f. PG&E shall endeavor to complete the meter change request within fifteen (15) days in the absence of a meter installation backlog or other circumstances beyond PG&E's control such as, but not limited to, delays in the installation of a communication line to the meter. PG&E shall provide notice of any current meter service backlog and estimate its next available installation date. However, if the DRP or the customer is willing to pay a fee to expedite the installation of the meter, PG&E will endeavor to accommodate the request. The fee shall be consistent with fees adopted by the CPUC.

(N)

(Continued)



ELECTRIC RULE NO. 24
 DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 21

F. METERING SERVICES (CONT'D)

(N)

1. Meter Changes (Cont'd)

- g. If requested by the customer or the DRP, PG&E as the MSP will make available a KYZ pulse connection to its meter so as to provide near real-time access to meter data to the DRP and the customer. The charge for the installation will be reasonable and consistent with CPUC-approved fees for similar services, and shall be paid for by either the customer or DRP. The installation shall not interfere with the normal operation of the meter. PG&E will endeavor to complete the installation of its pulse termination block (also known as the pulse interface box) within 15 days of payment by the non-Utility DRP or customer. Resource and access constraints, or certain emergency conditions, may preclude PG&E from meeting this timeframe. In these instances, PG&E shall provide the DRP notice of the next expected available installation date.

2. MDMA Services Performed by PG&E

PG&E shall perform all MDMA services required for DRP DR Service for Bundled Service customers and Community Choice Aggregation Service customers. Also, PG&E shall perform MDMA services for those Direct Access service customers that have elected PG&E to be its MDMA. MDMA obligations include but are not limited to the following:

- a. Meters for each of the DRP's customers shall be read and converted into RQMD and transferred to the DRP or its designated agent pursuant to applicable standards.
- b. PG&E shall provide the DRPs (or their designated agents) with reasonable and timely access to meter data as required to allow the proper performance of billing, settlement, scheduling, forecasting and other functions;
- c. The LSE and DRP shall have access to individual customer RQMD via an electronic interface (e.g., MDMA server)

(N)

(Continued)



ELECTRIC RULE NO. 24
 DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 22

F. METERING SERVICES (CONT'D.)

(N)

2. MDMA Services Performed by PG&E (Cont'd.)

- d. PG&E shall provide RQMD customer data to the DRP in accordance with standards adopted in the DASMMMD or other standards in compliance with the CAISO's applicable requirement, for the DRP's or its agent's consolidation into SQMD for the CAISO. PG&E shall be liable for providing timely and accurate RQMD to the non-Utility DRP or its designated agent to facilitate final meter data submission in accordance with the CAISO's tariff. If the MDMA is found, through the CPUC's remedy and dispute resolution process, to have failed to comply fully with the applicable requirements for submission of timely and accurate RQMD so as to be the sole fault for the ability for the DRP or its agent to comply fully with the applicable CAISO requirements, the MDMA shall be held liable, limited to the penalties imposed by the CAISO upon the non-Utility DRP or its Scheduling Coordinator (SC) due to the non-compliance.

3. MSP Services performed by PG&E

When acting as an MSP, PG&E shall, on a non-discriminatory basis, ensure that the revenue meter equipment is accurate within acceptable limits as specified in PG&E's applicable rules, and provide testing as necessary to maintain this standard. PG&E shall endeavor to fulfill requests for meters with interval durations specified by the DRP and/or its customers consistent with Section F.1.b above.

4. Telemetry

If a telemeter is required or communication facilities for sending telemeter information are required to participate in a DRP's program, the telemetering services and communication must conform to the CAISO's telemetry technical requirements. The DRP is solely responsible for providing a communication solution or telemetry solution subject to CAISO requirements at the expense of the DRP. To the extent that PG&E has the expertise and technical resources to install or assist with installation of the required telemetry solution or communication solution, PG&E may install or assist the DRP to facilitate the installation of the telemetry solution, at the DRP's expense.

5. Charges for Metering Services

The metering services for supporting DRP DR Services may be more extensive than normal metering services. PG&E, as an MSP, may charge the DRP for metering services only to the extent such charges are authorized by the CPUC.

(N)

(Continued)



ELECTRIC RULE NO. 24
 DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 23

G. DISCONTINUATION OF SERVICE BY DRP

(N)

1. Service Changes at the Individual Customer Level

The DRP may elect to discontinue providing DRP DR Service to its customers, or the customer may elect to disenroll from the program pursuant to any agreement between the DRP and its customers. Should customer terminate electric service with PG&E, the customer is responsible for terminating its arrangement with the DRP directly. For customers who change their LSE, the DRP is responsible for effectuating necessary changes in the CAISO's DRS.

2. Service Changes at the CAISO Resource Registration Level

A customer enrolled as part of a Resource Registration at the CAISO may have its DRP DR Service discontinued by its DRP due to the following conditions:

- a. The CPUC terminates or revokes the DRP's registration or its ability to participate in CAISO's DR Services
- b. The CPUC issues an order that otherwise prohibits the DRP from entering into a DRP Service Agreement (Form 79-1160);
- c. The DRP has materially breached its obligations under the terms and conditions of the DRP Service Agreement;
- d. The DRP exercises its contractual right to terminate the DRP Service Agreement;
- e. The DRP is no longer authorized by the CAISO to provide DR Services.
- f. The CPUC revokes the Utilities' authority to participate in DR Service(s) activities

3. Discontinuation of DRP DR Service by the DRP

- a. The DRP is responsible for notifying the LSE, PG&E, SC and MDMA, if impacted, when it will discontinue DRP DR Service to the customer.
- b. If the DRP elects to discontinue offering DRP DR Services, the DRP shall also notify the CAISO, CPUC, the LSE of its decision to do so and specify the date(s) on which service will be discontinued. The DRP will effect a termination of its Resource Registration with the CAISO;
- c. If the DRP is no longer able to provide DRP DR Service because its authorization to do so has been terminated or revoked, the DRP shall notify the impacted parties (LSEs, PG&E, SC, MDMA), and regulatory agencies (CAISO, CPUC) that aren't otherwise involved in the decision of such revocation or termination.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 24

G. DISCONTINUATION OF SERVICE BY DRP (CONT'D.)

(N)

- 3. Discontinuation of DRP DR Service by the DRP (Cont'd.)
 - d. Non-Utility DRPs must notify DRP DR Service participants that they should contact PG&E to revoke the authorization for the non-Utility DRP to receive their usage data as of the date the DRP DR Service is canceled.
 - e. In the event a non-Utility DRP has been authorized to terminate deliveries of a customer's metering data streams upon the customer's disenrollment in its DRP DR Service program, the non-Utility DRP is required to notify PG&E to stop transmission of data, consistent with customer's instructions to the DRP.

H. NON-UTILITY DRP CREDIT REQUIREMENTS REQUIRED BY PG&E

- 1. PG&E may require the non-Utility DRP enrolling Bundled Service customers to establish and maintain its creditworthiness through evaluations, deposits, or other security in the manner described in Section H.2, to the extent the CPUC approves the ability for PG&E to levy charges for services rendered as a result of DR activities. That is, the creditworthiness only applies to charges that are billed by PG&E directly to the non-Utility DRP. The method of determining the amount of credit that a DRP would need to submit in order to initiate services within PG&E's service territory shall be equal to two times the estimated or actual monthly CPUC-approved fees for DRP DR Service, as described herein and as verified by PG&E. The non-Utility DRP will be obliged to provide the CPUC with a separate performance bond as part of its registration process for Residential and Small Commercial customers.
- 2. The non-Utility DRP may establish its creditworthiness with PG&E through any one of the following:
 - a. Credit Evaluation

A non-Utility DRP with a demonstrable current credit rating of Baa2 or higher from Moody's or BBB or higher from Standard and Poor's, or Fitch is deemed to be creditworthy unless PG&E determines that a material change in the non-Utility DRP's creditworthiness has occurred. PG&E requires the non-Utility DRP to complete a credit application including financial information reasonably necessary to establish credit. The creditworthiness evaluation may be conducted by an outside credit analysis agency, determined by PG&E, with final credit approval granted by PG&E. This evaluation will be completed within ten (10) business days. Credit reports will remain strictly confidential between the credit analysis agency and PG&E, except to the extent PG&E is required to disclose to the CPUC or its agents. A credit application processing fee, as approved by the CPUC, may be charged to offset the cost of determining the non-Utility DRP's creditworthiness.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 25

H. NON-UTILITY DRP CREDIT REQUIREMENTS REQUIRED BY PG&E (CONT'D.)

(N)

2. The non-Utility DRP may establish its creditworthiness with PG&E through any one of the following (Cont'd.):

b. Security Deposits

The non-Utility DRP may submit and maintain a security deposit in lieu of submitting to or being qualified under a creditworthiness evaluation. The amount of the security deposit required to establish credit will be twice the estimated maximum monthly bill that PG&E may expect to remit to the non-Utility DRP for participating in one month of Demand Response Activities, where such estimate is based on the last twelve (12) months of historical activity. The initial value of the security deposit will be two times the monthly fees assessed by PG&E upon the DRP. Security deposits may be in the form of (1) cash deposits, with interest earned at the 3-month Non-Financial commercial paper rate, (2) letters of credit, defined as irrevocable and renewable issued by a major financial institution rated A/A2 by S&P/Moody's, respectively, (3) surety bonds, defined as renewable and issued by a major insurance company rated A/A2/A by S&P/Moody's/A.M. Best, respectively, or (4) guarantees, with guarantors having a credit rating of Baa2 or higher from Moody's or BBB or higher from Standard and Poor's, or Fitch unless PG&E determines that a material change in the guarantor's creditworthiness has occurred, or, in other cases, through the credit evaluation process described above. Security deposits must be posted with PG&E prior to the DRP's participation in DRP DR Service.

c. Security Deposit Payment Timetable

Non-Utility DRPs are obligated to post security deposits with PG&E prior to receiving certain services from PG&E which help facilitate their DR activities. PG&E shall provide notice to the non-Utility DRP of the appropriate deposit amount upon receiving a service request from the non-Utility DRP. Such a deposit shall be required at least three (3) days prior to PG&E providing its services to the non-Utility DRP for DR activities.

d. Interest on Cash Deposit

PG&E will pay interest on cash deposits as described in its Electric Rule 7.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 26

H. NON-UTILITY DRP CREDIT REQUIREMENTS REQUIRED BY PG&E (CONT'D.)

(N)

2. The non-Utility DRP may establish its creditworthiness with PG&E through any one of the following (Cont'd.):

e. Ongoing Maintenance of Credit

To ensure continued validity of established unsecured credit, the non-Utility DRP shall promptly notify PG&E of any material change in its credit rating or financial condition. The non-Utility DRP shall also furnish evidence of an acceptable credit rating or financial condition, as set forth above, to PG&E upon request. In the event PG&E determines that the non-Utility DRP's, or the non-Utility DRP's guarantor's, creditworthiness has materially changed, as set forth above, and the non-Utility DRP, within 30 days written notice, does not rectify or provide a security deposit commensurate with the change in creditworthiness, then PG&E shall notify the CAISO that the non-Utility DRP has defaulted on its credit requirements and is no longer eligible to participate as a DRP under PG&E's tariffs.

f. Re-establishment of Credit

A non-Utility DRP whose eligibility as a DRP has been terminated, revoked or suspended under this section may reestablish its credit worthiness by the provision of a security deposit, or by any other manner described in this Section H.

I. COMPLIANT AND DISPUTE RESOLUTION PROCESSES

1. Disputes Involving Entities Subject to this Rule

Disputes arising under this Rule or Schedule E-DRP shall be resolved in accordance with the CPUC's complaint procedures, Article 4 of the Commission's Rules of Practice and Procedure. Parties may choose to seek resolution through the Alternate Dispute Resolution Processes available through the Commission. The Commission shall resolve complaints regarding customer account eligibility, whether brought by the DRP, PG&E or the customer, expeditiously. However, entities seeking damages related to this Rule must do so in court.

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 27

I. COMPLIANT AND DISPUTE RESOLUTION PROCESSES (CONT'D.)

(N)

2. Suspension or Revocation of Non-Utility DRP's Registration at the CPUC

Pursuant to the Commission's authority provided by California Public Utilities Code, Sections 451, and 701 through 702, the CPUC's enforcement authority includes; but is not limited to, suspension or revocation of non-Utility DRP registration and imposition of penalties and/or fines after appropriate due process. The CPUC's Consumer Affairs Branch (CAB) shall process, and report to the Commission all informal consumer complaints against non-Utility DRPs on a quarterly basis.

If CAB staff determines, after consultation with Energy Division staff and facilitating mediation between a retail customer complainant and a non-Utility DRP, that a resolution cannot be reached, the complaint may be escalated to the CPUC's Safety and Enforcement Division (SED). SED may consider taking appropriate enforcement action, including proposing for Commission consideration the suspension and/or revocation of the non-Utility DRP's registration, and fines and/or penalties against the non-Utility DRP. SED will notify the non-Utility DRP, the CAISO, the relevant LSEs, and the UDC of such pending adverse action. The non-Utility DRP that is the subject of the SED action may respond to such action consistent with the procedures provided in the Commission's Rules of Practice and Procedure.

This process does not exclude alternative means of investigation of complaints regarding non-Utility DRPs as provided by the CPUC's Rules of Practice and Procedure. Information regarding formal and informal complaint processes is available through the CPUC's Public Advisor's Office or at www.cpuc.ca.gov.

Grounds for potential suspension or revocation of non-Utility DRP's registration and/or penalties or fines are based on the statutes cited in this section and the Commission Decisions (D.)12-11-025 and 13-12-029. Examples of conduct that may violate these authorities include, but are not limited to:

- a. Forgery of Rule 24 forms and other required documents;
- b. Use of deceptive or unclear advertisements or terms and conditions in contracts;
- c. Improper registration for servicing residential and small commercial customers (see DRP Registration Application Form);
- d. Failure in notifying customers when servicing residential and small commercial customers (see Section C.7);
- e. Failure in notifying PG&E and other impacted entities of a customer discontinuation of DR Services (see Section G.3);
- f. Violation of dual participation rules (see Section C.2.d)
- g. Non-payment of PG&E fees or credit/performance bond lapse. (see Sections E.1 and H).

(N)

(Continued)



ELECTRIC RULE NO. 24
DIRECT PARTICIPATION DEMAND RESPONSE

Sheet 28

I. COMPLIANT AND DISPUTE RESOLUTION PROCESSES (CONT'D.)

(N)

2. Suspension or Revocation of Non-Utility DRP's Registration at the CPUC (Cont'd.)

- h. Unauthorized data transfer of customer specific data to others (see Section D.1.d);
- i. Invalid DRP Service Agreement (Form 79-1160) with PG&E and the CAISO (see Section E);
- j. Failure to fulfill the mutually agreed-upon terms and conditions, e.g., non-payment to the enrolled customers for services rendered (See Customer Notification Form Letter).
- k. Provision of faulty or misleading equipment/data to the customer by the DRP to the detriment of the customer.

3. Appeal of a non-Utility DRP Suspension or Revocation at the CPUC

A non-Utility DRP may appeal in writing to the CAB regarding notification of suspension, revocation, or immediate revocation. To appeal the notification, the disqualified entity must first contact the CAB within thirty (30) days to discuss the issue. If the revoked entity has new information to provide the CAB, then it must be provided to CAB within thirty (30) days. If the revoked entity and the CAB cannot resolve the dispute, then the revoked entity can file a complaint using the CPUC's Formal Complaint process. Information on the formal Complaint process is available through the Public Advisor's Office at the CPUC or on CPUC's website: www.cpuc.ca.gov.

J. ACRONYMS

The following acronyms are used within this Rule 24:

- (BPM) - Business Practice Manual
- (CAB) - CPUC's Consumer Affairs Branch
- (CAISO) - California Independent System Operator
- (CCA) - Community Choice Aggregation
- (CISR-DR) - Customer Information Service Request for Demand Response
- (CPUC) - California Public Utilities Commission
- (DA) - Direct Access

(N)

(Continued)



ELECTRIC SAMPLE FORM 79-1152 Sheet 1
AUTHORIZATION OR REVOCATION OF AUTHORIZATION TO DISCLOSE
CUSTOMER INFORMATION TO A DEMAND RESPONSE PROVIDER UNDER
RULE 24

Advice Letter No: 4361-E-A
Decision No.

Issued by
Brian K. Cherry
Vice President
Regulatory Relations

Date Filed April 2, 2014
Effective March 3, 2014
Resolution No. E-4630



Form CISR-DRP: AUTHORIZATION OR REVOCATION OF AUTHORIZATION TO DISCLOSE CUSTOMER INFORMATION TO A DEMAND RESPONSE PROVIDER UNDER RULE 24

IMPORTANT INFORMATION FOR CUSTOMERS – BE SURE TO READ FIRST THIS IS A LEGALLY BINDING CONTRACT – READ IT CAREFULLY

Under Pacific Gas and Electric Company’s (PG&E’s) privacy policies, which can be found at [www.pge.com/about/company/privacy/customer], PG&E generally does not sell or disclose personal information about you, such as your name, address, phone number, or electric or gas account and billing information, to third parties unless you expressly authorize us to do so. The purpose of this form is to allow you, the customer, to exercise your right to choose whether to disclose your personal electricity usage data to a third Party acting as a Demand Response Provider (non-Utility DRP) who is participating in the California Independent System Operator’s (CAISO’s) wholesale markets subject to PG&E’s Rule 24. Once you authorize a non-Utility DRP to access personal information about you, you are responsible for ensuring that the non-Utility DRP safeguards the personal information from further disclosure without your consent.

This form authorizes the specified non-Utility DRP to access your data to provide demand response services under Rule 24. If you intend to authorize the non-Utility DRP or a different non-Utility DRP to receive additional billing records or billing information, and/or to act as your agent for purposes of making changes to your account and services with PG&E, then you must complete the “Authorization To: Receive Customer Information or Act on a Customer’s Behalf” Form (Form 79-1095), which can be accessed at PGE.com: www.pge.com/tariffs.

I, _____ NAME TITLE (IF APPLICABLE)

of _____ (Customer) have the following mailing address NAME OF CUSTOMER RECORD

_____, and do hereby MAILING ADDRESS CITY STATE ZIP

authorize _____ of _____ NAME OF NON-UTILITY DRP MAILING ADDRESS

_____, CITY STATE ZIP

To access electricity usage data for the listed account(s) indicated below:

ACCOUNTS INCLUDED IN THIS [] AUTHORIZATION OR [] REVOCATION (Please check one)

- 1. _____ SERVICE ADDRESS SERVICE ACCOUNT NUMBER
2. _____ SERVICE ADDRESS SERVICE ACCOUNT NUMBER
3. _____ SERVICE ADDRESS SERVICE ACCOUNT NUMBER

(For more than three accounts, please list additional accounts on a separate sheet and attach it to this form)

If authorization is being revoked, please continue to the section “Customer Revocation of Authorization” for your signature. To grant your authorization, please continue to complete the section below.



Form CISR-DRP: AUTHORIZATION OR REVOCATION OF
AUTHORIZATION TO DISCLOSE CUSTOMER INFORMATION TO
A DEMAND RESPONSE PROVIDER UNDER RULE 24

INFORMATION, ACTS AND FUNCTIONS AUTHORIZED

- A.** This authorization provides authority to the Third-Party DRP (and to a limited degree specified below, your Load Serving Entity (LSE)), to request and receive electricity usage data for the account(s) specified above. Requests for information may include the following information, as it is available:
- 1) Customer Account information, including service address and rate schedule,
 - 2) Up to 1 year of historical electric meter interval data,
 - 3) Unique identifier number to track service account in the CAISO Demand Response System for its DR Services (to be provided to your LSE),
 - 4) Customer's meter read cycle letter and the next Meter Read Date (for purposes of verifying eligibility date to begin DR Service).

- B.** By checking the box(es) below, I further authorize the Third-Party DRP to receive the following information about the account(s) listed above:

- PG&E demand response program(s) and tariff schedule(s) in which the service account(s) are currently enrolled and the estimated date of when the customer may be eligible to participate in DR Service without direct financial consequence from PG&E. Applicable PG&E demand response tariffs include: PG&E's Schedule(s) E-RSAC, E-CSAC, E-DBP, E-SLRP, E-OBMC, E-CBP, E-RSMART, E-BIP and PG&E's Aggregator Managed Portfolio (AMP). PG&E will also indicate if account(s) listed above is (are) participating in the Peak Day Pricing option of its applicable rate schedule.
- Billing history and all electric meter usage data for bill calculation for all my account(s), as specified herein, regarding electric utility services furnished by PG&E. (Maximum of 12 previous months).

PG&E will provide the data specified in sections A and B upon request by the Third-Party DRP, without charge, up to two times in a 12-month period per service account provided that this authorization is valid pursuant to Section D below. After two requests in a year, the customer or Third-Party DRP may be responsible for charges that may be incurred to process this request.

- C.** By checking one or both of the boxes below, and when PG&E is the Meter Data Management Agent for the service accounts specified, I (Customer) authorize the ongoing release of my electric meter interval data to the Third-Party DRP for the period of time specified in Section D.

- Release ongoing monthly electric meter interval data to the Third-Party DRP for the period specified in Section D below.
- Access to next day electric meter interval data, as it is available, to the Third-Party DRP for the period specified in Section D below.

The customer or its Third-Party DRP may be responsible for charges, authorized by the California Public Utilities Commission, which may be incurred to process the ongoing release of monthly data.

- D.** I (Customer) authorize the release of my data, as specified in Sections A, B and C above, for the service account(s) as specified in this form until otherwise revoked. Check the appropriate box below.



Form CISR-DRP: AUTHORIZATION OR REVOCATION OF AUTHORIZATION TO DISCLOSE CUSTOMER INFORMATION TO A DEMAND RESPONSE PROVIDER UNDER RULE 24

Beginning [Date] and continuing until [Date].

OR

Indefinitely, until I revoke this authorization or my account(s) are closed.

OR

Indefinitely, until my Third-Party DRP instructs PG&E to stop disclosing my data to it. [Note: If you check this box, you must also sign the applicable shaded section on the last page.]

I, Customer, further understand that regardless of my election above in this Section D, the data from Sections A, B, and C that I authorize to be transmitted may coincide with the dates of my enrollment in a Third-Party DRP's service such that although I, Customer, may no longer be enrolled in the Third-Party DRP's service, and although I may have submitted revocation of authorization to transmit data, that Third-Party DRP may still receive data that pertains to the period of time during which this authorization was valid. This authorization will assist the Third-Party DRP to settle invoices with the CAISO regarding my service accounts at the time during which they were active in the Third-Party DRP's program.

E. RELEASE OF ACCOUNT INFORMATION:

I (Customer) authorize PG&E to provide the information requested above, to the extent available, via any one of the following methods. The preferred format is (check all that apply):

Hard copy via US Mail (if applicable):

Facsimile at this telephone number:

Secured email, or electronic format via a secured data transmission platform.

F. OTHER DATA BEING RELEASED:

Additionally, I (Customer) authorize PG&E to provide other information to the Third-Party DRP as appropriate under Rule 24 for the Third-Party DRP to use my load to bid into the CAISO market, including without limitation, service account, service voltage, the meter number and type, location of the service account on the CAISO grid (including sub LAP and pNode), and the identity of my meter Data Management Agent, Meter Service Provider, and Load Serving Entity.

I request PG&E to provide information, as it is available, on the earliest eligible date(s) on which I can leave my current PG&E program without any contractual or program obligations under the terms and conditions of the tariff that may result in financial or tariff implications such as but are not limited to, losing bill protection or incentive payments, return of received incentives, and/or penalties.

G. This agreement at all times shall be subject to such modifications as the California Public Utilities Commission may direct from time to time in the exercise of its jurisdiction.



Form CISR-DRP: AUTHORIZATION OR REVOCATION OF AUTHORIZATION TO DISCLOSE CUSTOMER INFORMATION TO A DEMAND RESPONSE PROVIDER UNDER RULE 24

CUSTOMER AUTHORIZATION

I (Customer), _____(print name of authorized signatory), declare under penalty of perjury under the laws of the State of California that I am authorized to execute this document on behalf of the Customer of Record listed at the top of this form and that I have authority to financially bind the Customer of Record. I understand PG&E reserves the right to verify any authorization request submitted before releasing information or taking any action on my behalf. I authorize PG&E to i) release the requested information specified in Sections A, B and C on my account or facilities to the above-designated Third Party. I hereby release, hold harmless, and indemnify PG&E from any liability, claims, demands, and causes of action, damages, or expenses resulting from: 1) any release of information to the Third Party pursuant to this Authorization; 2) the unauthorized use of this information by the Third Party; and 3) from any actions taken by the Third Party pursuant to this Authorization. I understand that I may cancel this authorization at any time by submitting a written revocation using this form.

AUTHORIZED CUSTOMER SIGNATURE

TELEPHONE NUMBER
Executed this _____ day of _____ at _____
MONTH YEAR CITY AND STATE WHERE EXECUTED

THIRD-PARTY DRP ACCEPTANCE OF CUSTOMER RELEASE PROVISION

I (Third-Party DRP), hereby release, hold harmless, and indemnify PG&E from any liability, claims, demand, causes of action, damages, or expenses resulting from the use of customer information obtained pursuant to this authorization

THIRD PARTY DRP SIGNATURE

TELEPHONE NUMBER

COMPANY
Executed this _____ day of _____ at _____
MONTH YEAR CITY AND STATE WHERE EXECUTED

CUSTOMER REVOCATION OF AUTHORIZATION

I (Customer), _____(print name of authorized signatory), declare under penalty of perjury under the laws of the State of California that I am authorized to execute this document on behalf of the Customer of Record listed at the top of this form and that I have authority to financially bind the Customer of Record. I hereby revoke the authorization to release information to the above-designated Third-Party DRP. I hereby release, hold harmless, and indemnify PG&E from any liability, claims, demands, causes of action, damages, or expenses resulting from: (1) any negligent conduct relating to this revocation, (2) from any refusal to release information to the Third Party pursuant to this revocation: (3) for any conduct by the Third Party in connection with his revocation.

AUTHORIZED CUSTOMER SIGNATURE

TELEPHONE NUMBER
Executed this _____ day of _____ at _____
MONTH YEAR CITY AND STATE WHERE EXECUTED



Form CISR-DRP: AUTHORIZATION OR REVOCATION OF AUTHORIZATION TO DISCLOSE CUSTOMER INFORMATION TO A DEMAND RESPONSE PROVIDER UNDER RULE 24

CUSTOMER AUTHORIZATION TO ALLOW THIRD-PARTY DRP TO REVOKE AUTHORIZATION AND TO STOP PROVISION OF DATA

I (Customer) _____, declare under penalty of perjury under the laws of the State of California that I am authorized to execute this authorization on behalf of the Customer of Record listed at the top of this form and that I have authority to financially bind the Customer of Record. I hereby authorize the Third-Party DRP to revoke my authorization to release information to the Third-Party DRP upon my disenrollment from the Third-Party DRP's service using the section below. The Customer's revocation of the Authorization to release information to the Third-Party DRP also will revoke the authorization to allow the Third-Party DRP to revoke authorization. I hereby release, hold harmless and indemnify PG&E from any liability, claims, demands, and causes of action, damages or expenses resulting from: (1) any negligent conduct relating to the revocation, (2) any refusal to release information to the Third-Party DRP pursuant to the revocation; and (3) for any conduct by the Third Party DRP in connection with its revocation.

AUTHORIZED CUSTOMER SIGNATURE TELEPHONE NUMBER
Executed this _____ day of _____ (year) at _____

AUTHORIZATION OF REVOCATION BY THIRD PARTY DEMAND RESPONSE PROVIDER

I, _____ (name of Third Party), understand that the customer whose name appears in the immediately preceding Section above, has asked _____ (name of Third-Party DRP) to notify PG&E of the customer's disenrollment in _____'s (name of Third Party) program in order to effectuate the customer's revocation of authorization to receive the customer's data.

I _____ (name of Third-Party DRP), hereby notify PG&E of the date of the customer's actual or anticipated disenrollment in my Third-Party DRP services. I hereby release, hold harmless, and indemnify PG&E from any liability, claims, demands, causes of action, damages, or expenses resulting from my failure to timely notify PG&E of the customer's disenrollment from, _____'s (name of third Party) demand response service.

Date of Customer's Actual or Anticipated Disenrollment: _____

AUTHORIZED SIGNATURE TELEPHONE NUMBER
Third Party
Executed this _____ day of _____ (year) at _____
(city and state)

[PG&E internal use only]

Date Received: _____



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

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