

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 12, 2015

Advice Letter 4706-E

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale St, Mail Code B10C
PO Box 770000
San Francisco, CA 94177

Subject: Approval of PG&E's Request to Extend the Amendment to its Existing Qualifying Facility Power Purchase Agreement for Procurement of Eligible Renewable Energy Resources between Burney Forest Products and Pacific Gas and Electric Company

Dear Mr. Jacobson:

PG&E's Advice Letter 4706-E is effective as of October 1, 2015.

On May 24, 2012, the Commission approved Resolution E-4491, which approved an amendment to an existing Qualifying Facility contract with Burney Forest Products for the delivery of Renewable Portfolio Standard-eligible power. The amendment consisted of an initial three-year period, after which time PG&E had the option to extend the amendment for an additional year and, subsequently, the option to extend the amendment for another eleven months. The Resolution approved the three-year Amendment and the two options to extend the Amendment.¹ Resolution E-4491 reasoned that "it may be appropriate to extend the Amendment terms...depending on PG&E's compliance position at that time, and the state of the renewable energy market... [W]e believe the option to extend the Proposed Amendment term is reasonable as it preserves the ability to retain this generation if it is needed."²

On May 7, 2015, the Commission approved Resolution E-4702, which approved PG&E's one-year Extension Agreement to the Amendment, from October 1, 2014 to September 30, 2015. Resolution E-4702 found that "procurement of energy and capacity from Burney, a Renewables Portfolio Standard (RPS)-eligible biomass facility, is consistent with PG&E's 2013 RPS Procurement Plan, RPS Portfolio Need, and state policies on biomass procurement."³

¹ Resolution E-4491, Ordering Paragraph 1.

² Resolution E-4491 at 10.

³ Resolution E-4702, Finding of Fact 1.

On September 18, 2015, PG&E submitted Advice Letter (AL) 4706-E requesting approval to exercise the second, and final, option to extend the Amendment for an additional 11 months. The term of the Second Extension Agreement is October 1, 2015 to August 31, 2016. No party protested AL 4706-E. PG&E filed the AL as a Tier 3 AL, but pursuant to General Order 96-B, Section 7.6.1, Energy Division re-designated it as a Tier 2 AL. Energy Division has determined that it may be re-designated as a Tier 2 AL because Resolution E-4491 already approved the Amendment and the two options to extend the Amendment, so a Resolution and Commission approval of the Second Extension Agreement is redundant and unnecessary.

Energy Division staff reviewed PG&E's AL 4706-E and has determined that the 11-month Second Extension Agreement is consistent with state policy. The lower price in the final 11-month period of the Amendment benefits ratepayers and the Second Extension Agreement continues to provide the benefits described in Resolutions E-4491 and E-4702. Therefore, the AL is approved.

Sincerely,

A handwritten signature in black ink that reads "Edward Randolph". The signature is written in a cursive, slightly slanted style.

Edward Randolph
Director, Energy Division

September 18, 2015

Advice 4706-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Second Option to Extend Amendment to Existing Qualifying Facility Power Purchase Agreement for Procurement of Eligible Renewable Energy Resources between Burney Forest Products and Pacific Gas and Electric Company

I. INTRODUCTION AND SUMMARY OF REQUEST

Pacific Gas and Electric Company ("PG&E") seeks California Public Utilities Commission ("CPUC" or "Commission") approval of PG&E's election to extend for a second time an amendment ("Amendment") to a Qualifying Facility ("QF") Interim Standard Offer No. 4 Power Purchase Agreement ("PPA") with Burney Forest Products ("Burney"). The Amendment, which became effective on October 1, 2011, was approved by the Commission in Resolution E-4491 on May 24, 2012 ("Resolution"). The Amendment has an initial term of three years, and includes an option to extend the Amendment term by one year and a second option to further extend the Amendment for another eleven months.

The initial Amendment term expired on September 30, 2014. The Parties entered into an agreement for PG&E to exercise its option to extend the Amendment for one year, from October 1, 2014 to September 30, 2015, which was approved by the Commission in Resolution E-4702 on May 11, 2015. In this advice letter, PG&E seeks approval of its decision to exercise the second extension option to extend the Amendment for eleven months, commencing on October 1, 2015. Burney and PG&E have agreed to lower the Amendment price for the second extension period. Attached to this Advice Letter is a copy of the agreement between PG&E and Burney to lower the Amendment price and conditioning PG&E's decision to exercise the second extension on Commission approval ("Second Extension Agreement").¹

¹ The Second Extension of the Amendment to Standard Offer Power Purchase Agreement between Burney Forest Products and PG&E (PG&E Log # 13C038) is provided as Confidential Appendix A.

PG&E requests that the Commission issue a resolution no later than December 31, 2015, that approves the Second Extension Agreement without modification and thereby approves PG&E's election to extend the modified Amendment.

II. BACKGROUND

Burney operates a 29 megawatt ("MW") biomass generating facility located in Burney, California ("Facility"). The existing PPA is a 30-year contract that was originally developed as part of PG&E's QF program and expires on January 2, 2020. Burney has delivered electricity generated by the Facility under the PPA since the Facility began operations in October 1989, and it started providing firm capacity in January 1990.

In 2010, Burney indicated to PG&E that the PPA's terms and conditions were uneconomic for Burney to continue to operate the Facility at historical levels. On October 14, 2011, PG&E and Burney executed the Amendment, which provided a price increase in exchange for enhanced performance obligations. On December 19, 2011, PG&E filed Advice Letter 3974-E seeking approval of the Amendment.

The Commission approved the Amendment in Resolution E-4491, which was issued May 24, 2012. The Commission identified a number of reasons for approving the Amendment, including: (1) without the Amendment, the Facility would not operate economically; (2) the Facility provides Renewable Portfolio Standard ("RPS")-eligible energy to PG&E and continued operation of the Facility was consistent with the RPS need identified in PG&E's 2011 RPS Plan; (3) the Amendment is consistent with Executive Order S-06-06 encouraging the use and production of biomass energy; (4) the performance requirements in the Amendment "promote more reliable deliveries" from the Facility; (5) the Amendment price was reasonable compared to 2011 RPS Request for Offers ("RFO") offers; and (6) the Facility was viable.² The Commission also determined that the Amendment and PG&E's advice letter were consistent with Commission precedent and requirements of the QF/CHP Program Settlement, which at the time was approved by the CPUC but pending effectiveness.³

With regard to the options to extend the Amendment beyond the initial three-year term, the Commission noted:

We agree with PG&E that it may be appropriate to extend the amendment terms for as much as one year and eleven months beyond the initial 3-year period, with the prudence of that decision depending on PG&E's compliance position at that time, and the state of the renewable energy

² Resolution E-4491 at pp. 8-10.

³ *Id.* at pp. 5-6 (advice letter consistent with Commission filing requirements); p. 6 (amendment consistent with Qualifying Facility and Combined Heat and Power ("QF/CHP") Program Settlement); pp. 6-7 (Amendment includes all relevant RPS non-modifiable standard terms and conditions).

market. In light of this we believe the option to extend the [Amendment] term is reasonable and preserves the ability to retain the generation if needed.⁴

The Commission also explained that the decision to extend the Amendment should be “based on an assessment of need and value at that time...”⁵

PG&E exercised its first option to extend on October 1, 2014 which resulted in executing the First Extension Agreement for a twelve-month period. The Commission approved PG&E’s decision to exercise the first option to extend the Amendment in Resolution E-4702, noting that the Burney facility provided resource diversity for RPS-eligible resources, was consistent with Commission decisions, and was consistent with state policy to advance the use of biofuels in California.⁶

The first extension of the Amendment will expire on September 30, 2015. In the Second Extension Agreement, PG&E has agreed to extend the Amendment for an additional eleven months, through August 31, 2016. Burney and PG&E have also agreed to lower the contract price in the Amendment and to require Commission approval of PG&E’s decision to exercise the second option to amend. However, even at the reduced contract price, the economics are not competitive. A copy of the Second Extension Agreement is included as Appendix A to this Advice Letter. A confidential description of the terms of the Second Extension Agreement is included as Appendix B.

III. EXTENDING THE AMENDMENT FOR AN ADDITIONAL ELEVEN MONTHS IS CONSISTENT WITH STATE POLICY AND BENEFICIAL

When the Commission approved the Amendment, it indicated that PG&E should evaluate the “need and value” of the Amendment at the time the initial three-year period was set to expire in determining whether to exercise the extension options. PG&E has performed this evaluation and determined that extending the Amendment through the Second Extension Agreement is consistent with California policy and beneficial.

PG&E is not basing its recommendation to extend the Amendment primarily on the fact that the Facility provides RPS-eligible energy. Since the Amendment was originally executed in 2011, PG&E has contracted for additional RPS-eligible resources and thus does not have a need for incremental RPS-eligible energy to meet the 33 percent RPS target for 2020. However, pursuant to Decision 12-06-038, and the likelihood of the Governor signing Senate Bill 350 which PG&E supports, this facility’s generation can be banked forward for use in years beyond 2020. In addition, when the Commission approved the Amendment, and PG&E’s decision to exercise the first option to extend, it

⁴ *Id.* at p. 10.

⁵ *Id.* at p. 8.

⁶ Resolution E-4702 at pp. 7-9

discussed a number of benefits that supported the Amendment and the first extension. These benefits, and additional benefits associated with the Second Extension Agreement, are described in more detail below.

First, the Second Extension Agreement lowers the Amendment price. As described in Confidential Appendix B, Burney has agreed to lower the price paid under the Amendment for the eleven months of the second extension. However, the price of the Second Extension Agreement is higher than the underlying PPA price.

Second, the Second Extension Agreement ensures the continued operation of the Facility which contributes to the resource diversity of PG&E's portfolio of RPS-eligible resources.⁷ In light of ongoing drought and forest fires, California needs to find long-term solutions to mitigate the risk of extraordinary forest fires. PG&E views this transaction as a temporary solution to bridge the time necessary to address this risk comprehensively.

Third, the Amendment includes several provisions that increase Burney's obligations to meet production requirements and provide delivery schedules and notification of planned or forced outages. These provisions provide operational and scheduling benefits that do not exist in the PPA, and were cited by the Commission when it originally approved the Amendment. Burney has operated the Facility consistent with the terms of the Amendment since the Amendment went into effect.⁸

Fourth, the Facility is already built and interconnected to the electric grid, and will not pose any environmental concerns associated with the construction and interconnection of a new generating facility. Confidential Appendix C attached to this advice letter is a declaration from Noshir Irani, Assistant Secretary and authorized representative of Burney Forest Products. In his declaration, Mr. Irani explains that it is likely that the Facility would substantially reduce its operating hours absent the Second Extension Agreement.⁹

IV. PG&E HAS SATISFIED THE COMMISSION'S PROCEDURAL REQUIREMENTS

A. Procurement Review Group Participation

On September 16, 2015, PG&E sent an e-mail to its Procurement Review Group ("PRG") notifying the PRG that it was planning to extend the Amendment and describing the Second Extension Agreement.

⁷ Resolution E-4702 at p. 7.

⁸ See Appendix B

⁹ See Appendix C.

B. Independent Evaluator

As the Commission explained when it initially approved the Amendment, an Independent Evaluator (“IE”) is not required in this circumstance.¹⁰ PG&E voluntarily elected to use an IE when it negotiated the Amendment and elected to engage an IE on additional discussions with Burney (and in discussions with the other QF biomass generators under contract to PG&E in 2014). However, given that the Commission has already determined that the Amendment is reasonable, and given the limited duration of the extension, PG&E did not retain an IE to review the decision to extend the Amendment. Retaining an IE for this limited decision would have resulted in additional customer costs and would have provided limited benefits in this circumstance.

C. Advice Letter Filing

The filing of an advice letter seeking approval of the Second Extension Agreement, which is related to an amendment of a QF PPA, is consistent with Commission procedures and Decisions 06-12-009 and 07-09-040.¹¹

V. EFFECTIVE DATE AND REQUEST FOR CONFIDENTIAL TREATMENT

A. Requested Effective Date

PG&E requests that this advice filing be approved on or before December 31, 2015 with an effective date of October 1, 2015. The First Extension Amendment, which extends the initial three-year term of the Amendment for twelve months, expires on September 30, 2015. If the Commission does not approve the Second Extension Agreement, the Parties will terminate both the Amendment and the Second Extension Agreement. A decision by December 31, 2015 gives the Commission sufficient time to review this advice letter, and also gives Burney sufficient notice to make decisions regarding the continued operation of the Facility.

B. Request for Confidential Treatment

In support of this advice letter, PG&E provides the following confidential supporting documentation:

- Confidential Appendix A – Second Extension Agreement
- Confidential Appendix B – Summary of Second Extension Agreement and Facility Operation Under Amendment

¹⁰ Resolution E-4491 at p. 10.

¹¹ Resolution E-4491 at p. 5 (explaining Commission process for seeking approval of amendments to QF PPAs).

- Confidential Appendix C – Declaration of Noshir Irani (Burney Forest Products)

VI. REQUEST FOR COMMISSION APPROVAL

PG&E requests that the Commission issue a resolution no later than December 31, 2015, that approves the Second Extension Agreement without modification and thereby approves PG&E's election to exercise the second option to extend the Amendment as reasonable and prudent.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than October 8, 2015, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 3 advice letter be approved on or before December 31, 2015, with an effective date of October 1, 2015.

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 R. 13-12-010. 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/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Public Attachments:

Attachment 1: Declaration and Matrix of Harold J. Pestana Seeking Confidential Treatment Pursuant to D.08-04-023 and D.06-06-066

Confidential Attachments:

Appendix A: Second Extension Agreement
Appendix B: Summary of Second Extension Agreement and Facility Operation Under Amendment
Appendix C: Declaration of Noshir Irani (Burney Forest Products)

cc: Service List for R.13-12-010
Melicia Charles, Energy Division, CPUC
Noel Crisostomo, Energy Division, CPUC
Amy Kochanowsky, Energy Division, CPUC
Yuliya Shmidt, ORA, CPUC

Limited Access to Confidential Material:

The portions of this advice letter marked Confidential Protected Material are submitted under the confidentiality protections of Sections 583 and 454.5(g) of the Public Utilities Code and General Order 66-C. A separate Declaration Seeking Confidential Treatment regarding the confidential information is being submitted with this advice letter in accordance with D.08-04-023. This material is protected from public disclosure pursuant to D.06-06-066 because it consists of, among other items, the contract itself, price information, and analysis of the proposed energy procurement contract, which includes the following documents:

- Confidential Appendix A – Second Extension Agreement
- Confidential Appendix B – Summary of Second Extension Agreement and Facility Operation Under Amendment
- Confidential Appendix C – Declaration of Noshir Irani (Burney Forest Products)

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: Jennifer Wirowek

Phone #: (415) 973-1419

E-mail: J6WS@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) #: **4706-E**

Tier: 3

Subject of AL: **Second Option to Extend Amendment to Existing Qualifying Facility Power Purchase Agreement for Procurement of Eligible Renewable Energy Resources between Burney Forest Products and Pacific Gas and Electric Company**

Keywords (choose from CPUC listing): Agreements, Portfolio

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

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

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

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

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: Yes, please see Attachment 1 – Confidentiality Declaration and Matrix

Confidential information will be made available to those who have executed a nondisclosure agreement: Yes

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: Harold Pestana (415) 973-4523

Resolution Required? Yes No

Requested effective date: **October 1, 2015**

No. of tariff sheets: N/A

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: N/A

Service affected and changes proposed: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division
EDTariffUnit
505 Van Ness Ave., 4th Flr.
San Francisco, CA 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company
Attn: Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

Attachment 1

Confidential Declaration & Matrix

PACIFIC GAS AND ELECTRIC COMPANY

**DECLARATION OF HAROLD PESTANA IN SUPPORT OF
CONFIDENTIAL TREATMENT FOR CERTAIN DATA AND INFORMATION
CONTAINED IN PG&E'S ADVICE LETTER REQUESTING APPROVAL OF
THE OPTION TO EXTEND AMENDMENT TO EXISTING QUALIFYING FACILITY
POWER PURCHASE AGREEMENT FOR PROCUREMENT OF ELIGIBLE
RENEWABLE ENERGY RESOURCES BETWEEN BURNEY FOREST PRODUCTS
AND PACIFIC GAS AND ELECTRIC COMPANY (ADVICE 4706-E)**

I, Harold Pestana, declare:

1. I am a Senior Manager in the Energy Procurement Department within the Electric Operations Organization at Pacific Gas and Electric Company (PG&E). In this position, I have acquired knowledge of PG&E's contracts with numerous counterparties and have also gained knowledge of the operations of gas and electric sellers in general. Through this experience, I have become familiar with the type of information that would affect the negotiating positions of electric sellers with respect to price and other terms, as well as with the type of information that such sellers consider confidential and proprietary. I can also identify information that buyers and sellers of electricity would consider to be "market sensitive information" as defined by California Public Utilities Commission ("Commission") Decision ("D.") 06-06-066, that is, information that has the potential to materially impact a procuring party's market price for electricity if released to market participants. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information.

2. Based on my knowledge and experience, and in accordance with the D.06-06-066, D.08-04-023, General Order ("GO") 66-C, and relevant Commission rules, I make this declaration seeking confidential treatment for certain data and information contained in PG&E's advice letter requesting approval of the Second Extension Agreement, which extends the Amendment to Existing Qualifying Facility Power Purchase Agreement for Procurement of

Eligible Renewable Energy Resources Between Burney Forest Products and PG&E (Advice Letter 4706-E).

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive data and information covered by D.06-06-066 and GO 66-C. The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on September 18, 2015 at San Francisco, California.

/s/

HAROLD J. PESTANA

PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)

**APPROVAL OF THE OPTION TO EXTEND AMENDMENT TO POWER PURCHASE AGREEMENT BETWEEN
BURNEY FOREST PRODUCTS AND PACIFIC GAS AND ELECTRIC COMPANY (ADVICE 4706-E)
SUBMITTED ON SEPTEMBER 18, 2015**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To	Justification for Confidential Treatment	Length of Time Date To Be Kept Confidential
Confidential Appendix A: Second Extension Agreement	Item VII - Bilateral Contract Terms and Conditions - Electric, Section B (Contracts and power purchase agreements between utilities and non-affiliated third parties (except RPS))	Appendix A includes the Second Extension Agreement.	3 years
Confidential Appendix B: Discussion of Confidential Information Regarding the Second Extension Agreement	Item VII - Bilateral Contract Terms and Conditions - Electric, Section B (Contracts and power purchase agreements between utilities and non-affiliated third parties (except RPS))	Appendix B describes the contract terms in the Second Extension Agreement and related analysis.	3 years
Confidential Appendix C: Declaration of Noshir Irani, Assistant Secretary, an authorized representative of Burney Forest Products	General Order 66-C	This Appendix consists of a declaration from an officer of the corporation that owns the Facility that cites non-public information that if disclosed would cause harm to the counterparty. Disclosure of this Appendix could undermine PG&E's ability to bargain on behalf of its customers, the Appendix should remain confidential for three years.	Indefinite

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

AT&T	Don Pickett & Associates, Inc.	OnGrid Solar
Albion Power Company	Douglass & Liddell	Pacific Gas and Electric Company
Alcantar & Kahl LLP	Downey & Brand	Praxair
Anderson & Poole	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
BART	G. A. Krause & Assoc.	SCD Energy Solutions
Barkovich & Yap, Inc.	GenOn Energy Inc.	SCE
Bartle Wells Associates	GenOn Energy, Inc.	SDG&E and SoCalGas
Braun Blaising McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	SPURR
CENERGY POWER	Green Power Institute	San Francisco Water Power and Sewer
CPUC	Hanna & Morton	Seattle City Light
California Cotton Ginners & Growers Assn	In House Energy	Sempra Energy (Socal Gas)
California Energy Commission	International Power Technology	Sempra Utilities
California Public Utilities Commission	Intestate Gas Services, Inc.	SoCalGas
California State Association of Counties	Kelly Group	Southern California Edison Company
Calpine	Leviton Manufacturing Co., Inc.	Spark Energy
Casner, Steve	Linde	Sun Light & Power
Center for Biological Diversity	Los Angeles County Integrated Waste Management Task Force	Sunshine Design
City of Palo Alto	Los Angeles Dept of Water & Power	Tecogen, Inc.
City of San Jose	MRW & Associates	Tiger Natural Gas, Inc.
Clean Power	Manatt Phelps Phillips	TransCanada
Coast Economic Consulting	Marin Energy Authority	Troutman Sanders LLP
Commercial Energy	McKenna Long & Aldridge LLP	Utility Cost Management
Cool Earth Solar, Inc.	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	ORA	YEP Energy
Division of Ratepayer Advocates	Office of Ratepayer Advocates	