May 31, 2011

Advice Letter 3171-G

Jane K. Yura  
Vice President, Regulation and Rates  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10B  
P.O. Box 770000  
San Francisco, CA  94177

Subject: Establish Gas Preliminary Statement CH, Natural Gas Transmission Pipeline Safety Memorandum Account

Dear Ms. Yura:

Advice Letter 3171-G is denied per Resolution G-3453.

Sincerely,

Julie A. Fitch, Director  
Energy Division
December 1, 2010

Advice 3171-G
(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Establish Gas Preliminary Statement CH, Natural Gas Transmission Pipeline Safety Memorandum Account

Pacific Gas and Electric Company (PG&E) hereby submits this Advice Letter to establish Gas Preliminary Statement CH, the Natural Gas Transmission Pipeline Safety Memorandum Account (NGTPSMA).

Purpose

PG&E files this Advice Letter seeking a memorandum account to track costs associated with 1) programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety and 2) new or enhanced PG&E transmission pipeline safety programs. The purpose of this memorandum account is to allow PG&E to record and track expenses incurred in implementing these programs. PG&E is not seeking cost recovery for these programs at this time. Any cost recovery will be addressed either in a future California Public Utilities Commission (Commission or CPUC) proceeding or pursuant to a future PG&E application.

Background

On September 9, 2010, a rupture occurred on PG&E’s natural gas transmission line 132, which runs through San Bruno, California. PG&E continues to work with the National Transportation Safety Board (NTSB), the Commission and other officials, to investigate the cause of this tragic event and evaluate new measures that may be implemented to enhance and improve the safety of PG&E’s natural gas transmission system. PG&E anticipates that, in connection with these reviews, it may be ordered to implement new gas transmission pipeline safety procedures or programs.

PG&E has also launched Pipeline 2020, a program designed to enhance the safety of the utility’s natural gas transmission system.

Pipeline 2020 will focus PG&E’s efforts in five major areas:
• **Modernize Critical Pipeline Infrastructure**
PG&E will consult with regulators and engage industry experts on a multiyear modernization initiative to upgrade key gas transmission pipeline segments located in heavily populated and other critical areas. The company will work with an independent third-party expert to review and assess PG&E’s long-term roadmap, including criteria for prioritizing critical pipeline segments. Among the goals of the initiative will be to ensure that all upgraded lines can accommodate state-of-the-art inspections, including those using pigging technologies.

• **Expand the Use of Automatic or Remotely Operated Shut-Off Valves**
PG&E also proposes to consult with regulators and industry experts about expanding the use of automatic or remotely operated shut-off valves on segments of its gas transmission pipelines. The valves will give PG&E operators the capability to shut off gas flows without having to dispatch crews. The company will also work with state and federal legislators to ensure industry-wide use of best available technologies and practices in this area. To further this analysis PG&E intends to proceed with a pilot project to evaluate and install new automated valves in the first half of 2011.

• **Spur Development of Next-Generation Inspection Technologies**
To help catalyze technological advances that will improve pipeline safety nationally, PG&E has established an independent, nonprofit entity dedicated to researching and developing next-generation pipeline inspection and diagnostic tools. At no cost to customers, PG&E will provide the first $10 million to launch this organization, which will work with other industry partners, leading institutions and researchers with the expertise to make significant advances in this area.

• **Develop Industry-Leading Best Practices**
PG&E will closely review its practices related to pipeline integrity, safety and training – as well as practices used elsewhere in the industry – in order to develop industry-leading standards of excellence in this area. For example, the company will ensure that it is using state-of-the-art risk assessment techniques for prioritizing and planning work on its transmission pipelines.

• **Enhance Public Safety Partnerships**
Building on its already-extensive pipeline safety awareness and training programs, PG&E will work with local communities, public officials and first responders to forge model partnerships in support of pipeline safety. The company will provide detailed, customized information on pipeline locations and emergency response plans, as well as enhanced annual emergency response training. It will also step up outreach and education to reduce the incidence of third-party dig-ins on PG&E’s pipelines – the leading threat to pipeline safety and integrity.
Proposed Preliminary Statement

PG&E is requesting Commission authority to establish Gas Preliminary Statement CH, the NGTPSMA for gas (NGTPSMA-G), and record the costs of 1) programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety and 2) new or enhanced PG&E transmission pipeline safety programs.

PG&E proposes to establish the following sub-accounts to track and record costs of separate programs in the NGTPSMA:

1) **Pipeline Modernization**: This sub-account will track the costs associated with developing and implementing new criteria for pipeline replacements and modernization and will include the tracking of costs associated with enhanced record systems for verification of pipeline and valve data.

2) **Automated Shut-Off Valves**: This sub-account will track the costs associated with the use of automatic or remotely operated shut-off valves on segments of its gas transmission pipelines and enhancements in the automation of PG&E’s SCADA system, including the 2011 automated valve project described in Brian Cherry’s October 25, 2010 letter to Executive Director Paul Clanon.

3) **Pipeline Inspection and Retrofits**: This sub-account will track the costs associated with developing and implementing new standards and procedures for pipeline inspections, including pipeline retrofits necessary to facilitate “pigging” of transmission pipelines.

4) **Emergency Response and Public Safety**: This sub-account will track the costs associated with enhancing public safety programs and emergency response plans, including providing detailed information on pipeline locations to local communities, enhancing emergency response training and increasing education programs to reduce the risk of third-party dig-ins.

5) **New Governmental and Regulatory Requirements Not Covered Above**: This sub-account will track the costs associated with programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety not captured in sub-accounts 1-4.

Limited Nature Of Memorandum Account

PG&E seeks authority only to track costs associated with new or expanded natural gas pipeline safety programs and requirements. The memorandum account does not authorize or address future recovery of these costs in customer rates. Issues surrounding cost recovery will be addressed in a future Commission proceeding or in conjunction with a future PG&E application. PG&E will seek recovery of costs tracked in the NGTPSMA in its natural gas transmission rates only to the extent that it is
authorized to do so by the Commission consistent with its obligations under Section 12 (“Rate Certainty and Adjustments During Term of Settlement”) of the Gas Accord V Settlement Agreement (CPUC Application 09-09-013). Settling parties retain all rights to contest any future request to recover costs tracked in the NGTPSMA.

Regulatory Authority

PG&E seeks authority to establish the NGTPSMA to track and record costs pursuant to Public Utilities Code Sections 451, 701 and 728. The Commission has previously authorized the tracking of costs in a memorandum account through the procedural device of an advice letter filing.\(^1\)

In Resolution G-3432 (April 16, 2009), the Commission authorized PG&E to establish a memorandum account (filed by advice letter) to track the revenue requirement associated with the Market Decision Support System database platform replacement project as proposed in PG&E’s 2009-2011 Energy Efficiency Portfolio and Demand Response Applications.

In approving the memorandum account, the Commission stated:

Memorandum accounts record and track particular costs for capital projects, but do not provide a guaranteed authorization to meet expenditures using ratepayer funds. Ratepayer funds may be used at a later time, but only after Commission review and authorization of the project. Under a memorandum account, PG&E shareholders are at risk for any and all expenditures, should the Commission deny some or all parts of the project. (Resolution G-3432, pp. 3-4)

It is reasonable to establish the NGTPSMA because the account will allow PG&E to comply with new natural gas transmission pipeline safety mandates or requirements in a way that preserves its ability to seek appropriate cost recovery. PG&E has been confronted by extraordinary circumstances as it responds to the San Bruno tragedy. In coordination with the NTSB, CPUC and other governmental authorities, it intends to move forward with safety enhancements relating to its natural gas pipeline system. The NGTPSMA will facilitate a transparent review and accounting of the costs of implementing new pipeline safety mandates and the expenditures associated with PG&E’s Pipeline 2020 program for future Commission review. At this time, PG&E is requesting authority only to record and track pipeline safety expenditures for Commission review in a future proceeding. PG&E’s shareholders will be at risk for any expenditures not approved by the Commission in a subsequent proceeding or order.

\(^1\) The Commission approved PG&E Advice 2632-G-B and 2664-E-B, which authorized PG&E to establish two new memorandum accounts to track the pre-deployment expenditures associated with the Advanced Metering Infrastructure Project prior to Commission authorization of the program in a separate application. (Approved September 20, 2005)
**Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than **December 21, 2010**, which is 20 days after the date of this filing. Protests should be mailed to:

CPUC Energy Division  
Tariff Files, Room 4005  
DMS Branch  
505 Van Ness Avenue  
San Francisco, California 94102

Fax: (415) 703-2200  
E-mail: jnj@cpuc.ca.gov and mas@cpuc.ca.gov

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

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

Jane K. Yura  
Vice President, Regulation and Rates  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10B  
P.O. Box 770000  
San Francisco, California 94177

Fax: (415) 973-6520  
E-mail: PGETariffs@pge.com

**Effective Date**

PG&E requests that this Tier 3 advice filing become effective as of December 1, 2010, so that the costs can be tracked in the NGTPSMA.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for A.09-09-013 and A.09-12-020. Address changes to the General Order 96-B service list should be directed to e-mail PGETariffs@pge.com. For changes to any other service list, please contact the Commission’s Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at:

Vice President - Regulation and Rates

cc: Service Lists for A.09-09-013 and A.09-12-020

Attachments
**Company name/CPUC Utility No.** Pacific Gas and Electric Company (ID U39 M)

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<tr>
<th>Utility type:</th>
<th>Contact Person: Olivia Brown</th>
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<tr>
<td>☒ ELC</td>
<td>Phone #: 415.973.9312</td>
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<tr>
<td>☒ GAS</td>
<td>E-mail: <a href="mailto:oxb4@pge.com">oxb4@pge.com</a></td>
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**EXPLANATION OF UTILITY TYPE**

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

**Advice Letter (AL) #:** 3171-G  
**Subject of AL:** Establish Gas Preliminary Statement CH, Natural Gas Transmission Pipeline Safety and Reliability Memorandum Account

**Keywords (choose from CPUC listing):** Memorandum Account

**AL filing type:** ☒ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other ____________________________

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

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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

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

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

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

Resolution Required? ☒ Yes  ☐ No

Requested effective date: December 1, 2010  
No. of tariff sheets: 5

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). N/A

Tariff schedules affected: New Gas Preliminary Statement Part CH

Service affected and changes proposed: N/A

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

**CPUC, Energy Division**  
Tariff Files, Room 4005  
DMS Branch  
505 Van Ness Ave., San Francisco, CA 94102  
jnj@cpuc.ca.gov and mas@cpuc.ca.gov

**Pacific Gas and Electric Company**  
Attn: Jane K. Yura, Vice President, Regulation and Rates  
77 Beale Street, Mail Code B10B  
P.O. Box 770000  
San Francisco, CA 94177  
E-mail: PGETariffs@pge.com
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<td>28650-G</td>
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NATURAL GAS TRANSMISSION PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNT

1. PURPOSE: The purpose of the Natural Gas Transmission Pipeline Safety Memorandum Account (NGTPSMA-G) is to record costs associated with 1) programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety and 2) new or enhanced PG&E transmission pipeline safety programs. This memorandum account shall only track costs associated with new or expanded natural gas pipeline safety programs and requirements. It does not authorize or address future recovery of these costs in customer rates. Issues surrounding cost recovery will be addressed in a future Commission proceeding or in conjunction with a future PG&E application. PG&E shall seek recovery of costs tracked in the NGTPSMA in its natural gas transmission rates only to the extent that it is authorized to do so by the Commission consistent with its obligations under Section 12 (“Rate Certainty and Adjustments During Term of Settlement”) of the Gas Accord V Settlement Agreement (CPUC Application 09-09-013).

2. APPLICABILITY: The NGTPSMA-G shall apply to all gas customers except for those specifically excluded by the Commission.

3. REVISION DATE: Disposition of the balance in the account shall be determined by the Commission in a future proceeding or pursuant to a future PG&E application.

4. RATES: The NGTPSMA-G does not have a separate rate component.

5. ACCOUNTING PROCEDURE: The NGTPSMA-G consists of the following five subaccounts:

   a. Pipeline Modernization Memorandum Subaccount (PMMS)
      
      The “Pipeline Modernization Memorandum Subaccount” purpose is to track the costs associated with developing and implementing new criteria for pipeline replacements and modernization and will include the tracking of costs associated with enhanced record systems for verification of pipeline and valve data.
      
      The following entries will be made to this subaccount each month or as applicable:
      
      i. A debit entry equal to costs associated with the developing and implementing new criteria for pipeline replacements and modernization.
      ii. A debit entry equal to the costs associated with enhanced record systems for verification of pipeline and valve data.
      iii. A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.
5. ACCOUNTING PROCEDURE: (Cont’d.)

b. Automated Shut-off Valves Memorandum Subaccount (ASVMS)

The “Automated Shut-off Valves Memorandum Subaccount” purpose is to track the costs associated with the use of automatic or remotely operated shut-off valves and associated SCADA on segments of its gas transmission pipelines, including the 2011 automated valve pilot project.

The following entries will be made to this subaccount each month or as applicable:

i. A debit entry equal to costs associated with the use of automatic or remotely operated shut-off valves and associated SCADA on segments of its gas transmission pipelines.

ii. A debit entry equal to the cost for the 2011 automated valve pilot project. A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

c. Pipeline In-line Inspection and Retrofit Memorandum Subaccount (PIIRMS)

The “Pipeline In-line Inspection and Retrofit Memorandum Subaccount” purpose is to track the costs associated with developing and implementing new standards and procedures for pipeline inspections, including pipeline retrofits necessary to facilitate “pigging” of transmission pipelines.

The following entries will be made to this subaccount each month or as applicable:

i. A debit entry equal to costs associated with the developing and implementing new standards and procedures for pipeline inspections, including, but not limited to, pipeline retrofits.

ii. A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.
5. ACCOUNTING PROCEDURE: (Cont’d.)

d. Emergency Response and Public Safety Memorandum Subaccount (ERPSMS)  

The “Emergency Response and Public Safety Memorandum Subaccount” purpose is to track the costs associated with enhancing public safety programs and emergency response plans, including providing detailed information on pipeline locations to local communities, enhancing emergency response training and increasing education programs to reduce third-party dig-ins.

The following entries will be made to this subaccount each month or as applicable:

   i. A debit entry equal to costs associated with enhancing public safety programs and emergency response plans.
   ii. A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

e. New Governmental and Regulatory Requirements Memorandum Subaccount (NGRRMS)  

The “New Governmental and Regulatory Requirements Memorandum Subaccount” purpose is to track the costs associated with programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety not captured in subaccounts a-d.

The following entries will be made to this subaccount each month or as applicable:

   i. A debit entry equal to any costs associated with programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety not captured in subaccounts a-d.
   ii. A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.
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PG&E Gas and Electric
Advice Filing List
General Order 96-B, Section IV

Alcantar & Kahl LLP  Division of Business Advisory Services
Ameresco  Douglass & Lidell
Anderson & Poole  Downey & Brand
Arizona Public Service Company  Duke Energy
BART  Dutcher, John
Barkovich & Yap, Inc.  Economic Sciences Corporation
Bartle Wells Associates  Ellison Schneider & Harris LLP
Bloomberg  Foster Farms
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Braun Blaising McLaughlin, P.C.  Goodin, MacBride, Squeri, Schlotz & Ritchie
Brookfield Renewable Power  Green Power Institute
CA Bldg Industry Association  Hanna & Morton
CLECA Law Office  Hitachi
CSC Energy Services  In House Energy
California Cotton Ginners & Growers Assn  International Power Technology
California Energy Commission  Intestate Gas Services, Inc.
California League of Food Processors  Lawrence Berkeley National Lab
California Public Utilities Commission  Los Angeles Dept of Water & Power
Calpine  Luce, Forward, Hamilton & Scripps LLP
Casner, Steve  MAC Lighting Consulting
Chris, King  MBMC, Inc.
City of Palo Alto  Manatt Phelps Phillips
City of Palo Alto Utilities  McKenzie & Associates
Clean Energy Fuels  Merced Irrigation District
Coast Economic Consulting  Modesto Irrigation District
Commercial Energy  Morgan Stanley
Consumer Federation of California  Morrison & Foerster
Crossborder Energy  NLine Energy, Inc.
Davis Wright Tremaine LLP  NRG West
Day Carter Murphy  Navigant Consulting
Defense Energy Support Center  Norris & Wong Associates
Department of Water Resources  North America Power Partners
Dept of General Services  North Coast SolarResources

Occidental Energy Marketing, Inc.
OnGrid Solar
Praxair
R. W. Beck & Associates
RCS, Inc.
Recurrent Energy
SCD Energy Solutions
SCE
SMUD
SPURR
San Francisco Public Utilities Commission
Santa Fe Jets
Seattle City Light
Sempra Utilities
Sierra Pacific Power Company
Silicon Valley Power
Silo Energy LLC
Southern California Edison Company
Spark Energy, L.P.
Sunshine Design
Sutherland, Asbill & Brennan
Tabors Caramanis & Associates
Tecogen, Inc.
Tiger Natural Gas, Inc.
TransCanada
Turlock Irrigation District
United Cogen
Utility Cost Management
Utility Specialists
Verizon
Wellhead Electric Company
Western Manufactured Housing
Communities Association (WMA)
eMeter Corporation