

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 5, 2018

SDG&E AL 3256-E
PG&E AL 5345-E
SCE AL 3833-E

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Subject: Staff Disposition of: SDG&E AL 3256-E, PG&E AL 5345-E, and SCE AL 3833-E Update to Community Choice Aggregate and Energy Service Provider Load Data and Utility Investment and Procurement Information

Dear Messrs Stern and Jacobson and Mmes Caulson and Genao:

The CPUC Energy Division (ED) approves San Diego Gas & Electric Company (SDG&E) AL 3256-E, Pacific Gas and Electric Company (PG&E) AL 5345-E and Southern California Edison Company (SCE) AL 3833-E (hereafter "joint ALs") in their entirety. These ALs shall go into effect as of the date of filing, August 1, 2018.

On August 1, 2018, SDG&E, PG&E and SCE jointly and timely filed Tier 1 Advice Letters (ALs) 3256-E, 5345-E and 3833-E, with updated community choice aggregator (CCA) and energy service provider (ESP) load data, updated IOU energy storage procurement, and associated recalculation of energy storage procurement obligations, as required by Ordering Paragraph 5 of Decision (D.) 17-04-039.

On August 21, 2018, the Alliance of Retail Energy Markets (AREM) and Direct Access Customer Coalition (DACC), and Marin Clean Energy (MCE) submitted comments on the joint ALs.

PG&E timely filed a reply to the comments of MCE on August 28, 2018.

In their comments, AREM and DACC agree with the calculations provided by the three IOUs in the joint ALs. In their comments, MCE states that there is a slight miscalculation of CCA load data in PG&E's service territory. Specifically, MCE recommends that PG&E be required to adjust its calculation of CCA load share from 209 megawatts (MWs) to 207 MWs. In its reply to MCE's comments, PG&E maintains that the calculation of 209 MWs of CCA load share in its service territory is accurate, due to slight differences in the percentage calculation. Specifically, the percentage calculations which are included in the joint AL, and on which MCE conducted its analysis, are rounded to the nearest tenth of a point. MCE also states that SDG&E's calculation of CCA share should be adjusted to take into account the storage costs recovered through non-bypassable charges for SDG&E and reflect that the automatic limiter has been triggered. We clarify that the joint ALs do reflect the triggering of the automatic limiter for CCAs in SDG&E service territory and reduces the 1% obligation from 1 MW to 0.5 MWs.

Energy Division has reviewed the joint ALs, points raised by protestors, and finds the utilities' calculations to be reasonable. We do not require further action from the IOUs. We do note that the automatic limiter has been triggered for ESPs and CCAs in the service territories of all three IOUs, and their 1% storage procurement obligation has been eliminated. SDG&E AL 3256-E, PG&E AL 5345-E, and SCE AL 3833-E are therefore approved in their entirety, with an effective date of August 1, 2018.

Please contact Rachel McMahon of Energy Division at rachel.mcmahon@cpuc.ca.gov with any questions.

Sincerely,



FOR

Edward Randolph
Director, Energy Division

cc: ED Tariff Unit (edtariffunit@cpuc.ca.gov)
Sue Mara, for AREM/DACC (sue.mara@rtoadvisors.com)
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Service List R.15-03-011



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August 1, 2018

ADVICE LETTER 3256-E

(San Diego Gas & Electric Company - U902-E)

ADVICE LETTER 5345-E

(Pacific Gas and Electric Company – U39-E)

ADVICE LETTER 3833-E

(Southern California Edison Company – U338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: UPDATE TO COMMUNITY CHOICE AGGREGATE AND ENERGY SERVICE PROVIDER LOAD DATA AND UTILITY INVESTMENT AND PROCUREMENT INFORMATION

PURPOSE

Pursuant to Ordering Paragraph (OP) 5 of California Public Utilities Commission (CPUC or Commission) Decision (D.) 17-04-039, San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), and Pacific Gas and Electric Company (PG&E), (collectively, the Joint Utilities) respectfully submit this advice letter to update Tables 3 through 6 based on the most current Community Choice Aggregator (CCA) and Energy Service Provider (ESP) load data and utility investment and procurement information.

BACKGROUND

On October 21, 2013, the Commission issued D.13-10-040 to establish the Energy Storage Procurement Framework and Design Program (“Energy Storage Program”). The Energy Storage Program set a procurement target of 1,325 megawatts of energy storage projects for the Investor-Owned Utilities (“IOU”) to procure through a series of solicitations from 2014 to 2020.¹ All storage projects must be online no later than 2024.²

Additionally, the Energy Storage Program set a procurement target for all CCAs and ESPs to procure one percent of their 2020 load, with all storage projects being online no later than 2024.³

¹ D.13-10-040, Appendix A, p.1.

² *Id.*

³ *Id.* at 46.

On January 5, 2016, the CPUC issued a Scoping Memo and Ruling in Track 2 of the Energy Storage Order Instituting Rulemaking (OIR) seeking parties' comments on revision of energy storage procurements targets.⁴ The Alliance for Retail Energy Markets and Direct Access Customer Coalition (AReM/DACC) argued that some CCA/ESP procurement obligations can exceed a utility's, and proposed to prohibit future cost recovery through non-bypassable charges and credit ESPs with any excess storage for procurement that is above what the IOUs are obligated to procure.⁵

In D.17-04-039, the Commission ruled that revisions to cost recovery of storage procurement were beyond the scope of the proceeding, but that it was in scope to consider revisions to the CCA/ESP storage procurement targets. The Commission reviewed the extent to which the combined one percent procurement obligation and non-bypassable charges assigned to CCAs/ESPs compares with the utility procurement obligations, as a percentage of utility load.

In the instance that a CCA/ESP procurement obligation exceeds that of the utility, the Commission adopted an automatic limiter that proportionately reduces each CCAs/ESPs one percent procurement obligation by the amount that the load serving entity's own procurement plus its customers' share of non-bypassable charges exceeds the utility obligation by a percentage of load.⁶ Comparing IOU and CCA/ESP storage procurement obligations as a percentage of load is done using Tables 3 through 6 of D.17-04-039.

Ordering Paragraph 5 of D.17-04-039 requires the IOUs to update Tables 3 through 6 on an annual basis beginning August 1, 2017 through 2020.

On August 1, 2017, the Joint Utilities filed AL 5119-E et al to update Tables 3 through 6, originally included in D.17-04-039.

The Commission's Resolution E-4892 addressing AL 5119-E et al. directed the IOUs to submit a supplemental advice letter to make correction to Tables 4 through 6.

On January 16, 2018, the Joint Utilities filed AL 3640-E-A et. al to make these corrections. On February 5, 2018, AReM/DACC filed timely comments on the Joint Utilities' AL 3640-E-A et. al.⁷ AReM/DACC contended that the Joint Utilities did not calculate the automatic limiter and adjusted energy storage procurement obligations of the ESPs correctly, and argued that the Joint Utilities should have combined the ESP obligation across IOUs.⁸

On February 12, 2018, the Joint Utilities filed a timely reply.⁹ The Joint Utilities responded that D.17-04-039 did not adopt a new statewide target and it did not allow ESPs and CCAs in one IOU's service territory to benefit from the allocation of procurement in another IOU's service

⁴ R.15-03-011 – "Assigned Commissioner and Assigned Administrative Law Judge's Scoping Memo and Ruling Seeking Party Comments." P.5-6.

⁵ D.17-04-039, p. 22-23.

⁶ *Id.* at 27.

⁷ Comments of AReM/DACC on SCE's Advice Letter 3640-EA, PG&E's Advice Letter 5119-E-A, and SDG&E's Advice Letter 3103-E-A Updating Energy Storage Obligations, February 12, 2018.

⁸ *Id.* at 2-3.

⁹ Joint Reply to Comments on Joint Supplement SDG&E Letter 3103-E-A, PG&E Advice Letter 5119-E-A, and SCE Advice Letter 3640-E-A, February 12, 2018.

territory. Each ESP and CCA is bound by the 1 percent procurement target, and procurement target is only reduced if that LSE's own procurement plus its customers' share of nonbypassable charges exceeds the host utility's obligation as a percentage of load.¹⁰

The CPUC issued a disposition letter on February 21, 2018 approving AL 3640-E-A et al. in its entirety, effective January 16, 2018. The CPUC's disposition letter determined that the IOUs correctly applied the automatic limiter, and clarified that each individual ESP and CCA must calculate its procurement obligation based on its own procurement and its customers' share of nonbypassable charges.¹¹

Updated Tables

Table 3: ENERGY STORAGE COST RECOVERY (Data as of July 2018)

SERVICE TERRITORY	PG&E	SCE	SDG&E
Storage MW recovered or approved for recovery via non-bypassable charges (to date) ¹²	27.93 ¹³	461.46 ¹⁴	151.06 ¹⁵
Future (known additional) MW expected to be recovered via non-bypassable charges ¹⁶	587.5 ¹⁷	111.5 ¹⁸	102 ¹⁹
Total MW expected to be recovered via non-bypassable charges	615.43	572.96	253.06

¹⁰ *Id.* at 2.

¹¹ CPUC Staff Disposition Letter, February 21, 2018, p. 3.

¹² This information reflects Cost Allocation Mechanism (CAM) and distribution charge recovery, and only those contracts that have been approved for recovery to date.

¹³ 6 MW via distribution charge + 21.43 MW of customer-sited SGIP/PLS projects (A.18-03-001, Application of PG&E for Approval of its 2018 Energy Storage Procurement and Investment Plan) + 0.5 MW for Browns Valley (A.16-03-001; D.16-09-007).

¹⁴ 13.92 MW via distribution charge + 116.4 MW of SGIP (Includes SCE's Committed and Installed SGIP Projects through July 2018) + 5.5 MWPLS (See 2018 Energy Storage Procurement and Investment Plan (as of March 2018) (does not account for DA / CCA counting rule application for SGIP as per D.16-01-032) + 22 MW of Aliso Canyon Energy Storage (ACES) projects (Resolution E-4804 - 5 MW of original 27 MW authorization was cancelled) + 263.64 MW in West LA Basin via SCE 2013 LCR RFO to replace SONGs capacity (D.15-11-041) + 20 ACES Design Build Transfer (Resolution E-4791) + ACES Enhanced Generation Turbines (A.17-03-020).

¹⁵ 6.15 MW via distribution rates + 23.91 MW of SGIP/PLS + 37.5 MW of ACES storage projects (Resolution E-4798) + 83.5 MW Track IV LCR (D.18-05-024).

¹⁶ D.17-04-039 does not include a requirement of a forecast of non-bypassable charges, as Decision notes that doing so would be too speculative or of limited value; however, the IOUs include both storage expected to be recovered through CAM and distribution charges, to include forecasted MWs that are consistent with the IOU applications filed in the 2018 Energy Storage Procurement and Investment Plans.

¹⁷ 20 MW for Llagas (A.17-12-003) + 567.5 MW for four projects pursuant to Resolution E-4909 (AL 5322-E).

¹⁸ Preferred Resources Pilot 2 - 60 MW (A.16-11-002) + 40 MW Local Energy Storage & Management project (A.18-03-002) + 4 MW MASH / SOMAH Paired-Storage project (A.18-03-002) + 7.5 MW (SCE Pending Reservation for SGIP).

¹⁹ See A.18-02-016.

Table 4: DIRECT ACCESS STORAGE PROCUREMENT COST OBLIGATIONS (Data as of June 2018)

SERVICE TERRITORY	PG&E	SCE	SDG&E
Applicable ESP load (GWh) ²⁰	9,520	10,599	3,459
DA MW share of non-bypassable charges ²¹	80	74	33
1% ESP procurement obligation (GWh)	95	106	35
1% ESP procurement obligation (MW) ²²	17	19	6

Table 5: COMMUNITY CHOICE AGGREGATORS STORAGE PROCUREMENT COST OBLIGATIONS (Data as of June 2018)

SERVICE TERRITORY	PG&E	SCE	SDG&E
Applicable CCA load (GWh)	36,316 ²³	14973 ²⁴	66 ²⁵
CCA MW share of non-bypassable charges ²⁶	272	104	1
1% CCA procurement obligation (GWh)	363	150	1
1% CCA procurement obligation (MW)	65	27	0.1

²⁰ 2020 Direct Access load forecast data available at: 2017 IEPR Load Forecast <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=17-IEPR-03>. Revised LSE and BA Tables Mid Baseline – Mid AAEE. Form 1.1(c).

²¹ Direct Access (DA) ESPs are responsible for non-bypassable charges based on load share for CAM and distribution rates. This does not include PCIA for storage. ESPs comprise 13.0 percent of load share, based on the latest Direct Access Implementation Activities Report, published June 15, 2018, accessible at: <http://www.cpuc.ca.gov/General.aspx?id=6598>

²² Assumes 64 percent capacity factor (CF) for ESPs and CCAs as referenced in D.17-04-039, FN 35. MW = 1000*GWh/(CF/8760).

²³ 2020 CCA load forecast data available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=17-IEPR-03>. Revised LSE and BA Tables Mid Baseline – Mid AAEE. Form 1.1(c). Load forecasts for Marin Clean Energy, Clean Power SF, and King City were subsequently updated through 2018 IRP proceeding (R.16-02-007).

²⁴ CCA Data from multiple sources: (1) 2017 IEPR Form 1.5a (GWh) (includes 2020 Forecasts for Lancaster, Apple Valley, Pico Rivera) + 2020 Forecasted CCA Data from 2018 IRP Filings (R.16-02-007); (2) Desert Community Energy's Annual Load Forecasts Projected to 2030, in Response to the ALJ Ruling Seeking Comment on GHG Emissions Accounting Methods and Addressing Updated GHG Benchmarks; (3) Motion of Los Angeles Community Choice Energy to Modify Its Load Forecast and GHG Emissions Benchmark; (4) Response of Rancho Mirage Energy Authority to ALJ Ruling Addressing Updated GHG Benchmarks (5) Response of San Jacinot to ALJ Ruling Addressing Updated Greenhouse Gas Benchmarks.

²⁵ 2020 CCA load forecast data available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=17-IEPR-03>. Revised LSE and BA Tables Mid Baseline – Mid AAEE. Form 1.1(c). Load forecast for Solana Energy Alliance was subsequently submitted through the 2018 IRP proceeding (R.16-02-007).

²⁶ Currently active CCAs comprise 44.2 percent of forecasted 2020 load in PG&E territory; 18.2% of forecasted 2020 load in SCE territory; 0.4% of forecasted 2020 load in SDG&E territory. Percentages are derived from 2017 IEPR Load Forecast. Available at:

<https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=17-IEPR-03>. Revised LSE and BA Tables Mid Baseline – Mid AAEE. Form 1.1(c) and Form 1.5(b).

**Table 6: COMPARISON OF UTILITY, DIRECT ACCESS, AND
COMMUNITY CHOICE AGGREGATORS STORAGE PROCUREMENT
COST OBLIGATIONS (Data as of June 2018)**

SERVICE TERRITORY	PG&E		SCE		SDG&E	
Storage obligation as % of total 2020 load forecast- Storage Target of 1325 MW	580 MW ~ 3.2% ²⁷		580 MW ~2.6% ²⁸		165 MW ~4.1% ²⁹	
Storage obligations as % total of 2020 load forecast – Storage Target of 1825 MW ³⁰	746 MW ~ 4.1%		746 MW ~3.3%		331 MW ~8.3%	
Automatic Limiter Adjustment	Unadjusted	Adjusted	Unadjusted ³¹	Adjusted ³²	Unadjusted ³³	Adjusted ³⁴
ESP Current Share: 1% procurement obligation + non-bypassable charge (MW / % of load)	97 MW ~ 5.7 %	54 MW ~3.2%	93 MW ~4.9%	49MW ~2.6%	39 MW ~6.3%	25 MW ~4.1%
CCA Current Share: 1% procurement obligation + non-bypassable charge (MW / % of load)	337 MW ~ 5.2 %	209 MW ~3.2%	131 MW ~4.9%	70 MW ~2.6 %	1 MW ~8.8%	0.5 MW ~4.1%

²⁷ PG&E Load Updated – 18,196 MW. PG&E Load derived from 2017 IEPR Load Forecast, Revised LSE and BA Tables Mid Baseline – Mid AAEE. Form 1.5(b). PG&E Service Area Greater Bay Area + PG&E Service Area Non Bay Area + PG&E Service Area ZP26.

²⁸ SCE Load Updated – 22,276 MW. Source: IEPR LSE and BA Tables – Mid Baseline Mid AAEE Form 1.5b = SCE TAC area load, less CDRW and Pasadena load.

²⁹ SDG&E Load Updated – 4,010 MW. Source: IEPR LSE and BA Tables – Mid Baseline Mid AAEE Form 1.5b = SDG&E Service Area.

³⁰ Includes procurement under AB 2868.

³¹ ESP / CCA Current Share, without application of Automatic Limiter

³² ESP / CCA Current Share, with application of Automatic Limiter

³³ ESP / CCA Current Share, without application of Automatic Limiter

³⁴ ESP / CCA Current Share, with application of Automatic Limiter

EXPLANATION OF UPDATES

Table 3 has been updated to reflect the most current publicly available Energy Storage Cost Recovery Data.

Table 4 has been updated to reflect the most current publicly available Direct Access Storage Procurement Cost Obligations.

Table 5 has been updated to reflect the most recent, publicly available CCA load data.

Table 6 has been updated with the latest ESP and CCA information available to the Joint Utilities.

For PG&E, because the ESP and CCA procurement obligations exceed PG&E's storage obligation as a percentage of load of PG&E (*i.e.*, greater than 3.2% - relative to Storage Target of 580 MW), the automatic limiter has been triggered for PG&E for the ESP and CCA current shares. As such, PG&E has applied the automatic limiter to the ESP and CCA shares in Table 6. PG&E shows both the unadjusted MW / % (*i.e.*, before application of limiter), and adjusted (*i.e.*, after application of limiter) values for comparison purposes.

For SCE, because the ESP and CCA procurement obligations exceed SCE's storage obligation as a percentage of load of SCE (*i.e.*, greater than 2.6% - relative to Storage Target of 580 MW), the automatic limiter has been triggered for SCE for the ESP and CCA current shares. As such, SCE has applied the automatic limiter to the ESP and CCA shares in Table 6. SCE shows both the unadjusted MW / % (*i.e.*, before application of limiter), and adjusted (*i.e.*, after application of limiter) values for comparison purposes.

For SDG&E, because the ESP procurement obligations for SDG&E exceed SDG&E's storage obligation (*i.e.*, ESP procurement obligation is greater than 4.1% - relative to Storage Target of 165 MW), the automatic limiter has been triggered for SDG&E for the ESP current share. As such, SDG&E has applied the automatic limiter to the ESP share in Table 6. SDG&E shows both the unadjusted MW / % (*i.e.*, before application of limiter), and adjusted (*i.e.*, after application of limiter) values for comparison purposes.

No cost information is required for this advice filing.

This advice filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.1(1), this advice letter is submitted with a Tier 1 designation which is the same Tier designation as the original filing, Advice 3640-E, et al.

EFFECTIVE DATE

This filing is subject to Energy Division disposition and is classified as Tier 1 (effective pending disposition) pursuant to GO 96-B, Energy Industry Rule 5.1 and OP 9. SDG&E respectfully requests that this filing become effective on August 1, 2018, which is the date of this filing.

PROTEST

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received no later than August 21, 2018, which is 20 days from the date this Advice Letter was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

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

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

For SDG&E: Megan Caulson
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For SCE: Gary A. Stern, Ph.D.
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For PG&E:

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NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties in R.15-03-011, by providing them a copy hereof either electronically or via the U.S. mail, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by email to SDG&ETariffs@semprautilities.com.

CLAY FABER
Director – Regulatory Affairs

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. **SAN DIEGO GAS & ELECTRIC (U 902)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Megan Caulson

Phone #: (858) 654-1748

E-mail: mcaulson@semprautilities.com

EXPLANATION OF UTILITY TYPE

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 3256-E

Subject of AL:) Update to Community Choice Aggregate and Energy Service Provider Load Data and Utility Investment and Procurement Information

Keywords (choose from CPUC listing): Compliance, Procurement, Energy Storage

AL filing type: Monthly Quarterly Annual One-Time Other

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

D.17-04-039

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL _____

Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A

Does AL request confidential treatment? If so, provide explanation: _____

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 8/1/18

No. of tariff sheets: 0

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 proposed¹: N/A

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

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

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

San Diego Gas & Electric
Attention: Megan Caulson
8330 Century Park Ct, Room 31F
San Diego, CA 92123
mcaulson@semprautilities.com

¹ Discuss in AL if more space is needed.

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

Public Utilities Commission

Office of Ratepayer Advocates (ORA)

R. Pocta

Energy Division

M. Ghadessi

M. Salinas

L. Tan

R. Ciupagea

Tariff Unit

CA Energy Commission

B. Penning

B. Helft

Advantage Energy

C. Farrell

Alcantar & Kahl LLP

M. Cade

K. Harteloo

AT&T

Regulatory

Barkovich & Yap, Inc.

B. Barkovich

Braun & Blasing, P.C.

S. Blasing

D. Griffiths

CA Dept. of General Services

H. Nanjo

California Energy Markets

General

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

City of Poway

Poway City Hall

City of San Diego

F. Ortlieb

B. Henry

L. Azar

Y. Lu

Clean Power Research

T. Schmid

G. Novotny

Davis Wright Tremaine LLP

J. Pau

Douglass & Liddell

D. Douglass

D. Liddell

Ellison Schneider Harris & Donlan LLP

E. Janssen

C. Kappel

Energy Policy Initiatives Center (USD)

S. Anders

Energy Regulatory Solutions Consultants

L. Medina

Energy Strategies, Inc.

K. Campbell

EQ Research

General

Goodin, MacBride, Squeri, & Day LLP

B. Cragg

J. Squeri

Green Charge

K. Lucas

Hanna and Morton LLP

N. Pedersen

JBS Energy

J. Nahigian

Keyes & Fox, LLP

B. Elder

Manatt, Phelps & Phillips LLP

D. Huard

R. Keen

McKenna, Long & Aldridge LLP

J. Leslie

Morrison & Foerster LLP

P. Hanschen

MRW & Associates LLC

General

NLine Energy

M. Swindle

NRG Energy

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Pacific Gas & Electric Co.

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Tariff Unit

RTO Advisors

S. Mara

SCD Energy Solutions

P. Muller

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O. Armi

Solar Turbines

C. Frank

SPURR

M. Rochman

Southern California Edison Co.

K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

K. Davoodi

US General Services Administration

D. Bogni

Valley Center Municipal Water Distr

G. Broomell

Western Manufactured Housing
Communities Association

S. Dey

Interested Parties in:

R.15-03-011

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	Ellison Schneider & Harris LLP	Praxair
Alcantar & Kahl LLP	Energy Management Service	Regulatory & Cogeneration Service, Inc.
Anderson & Poole	Evaluation + Strategy for Social Innovation	SCD Energy Solutions
Atlas ReFuel	GenOn Energy, Inc.	SCE
BART	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Green Charge Networks	SPURR
Braun Blaising Smith Wynne P.C.	Green Power Institute	San Francisco Water Power and Sewer
CalCom Solar	Hanna & Morton	Seattle City Light
California Cotton Ginners & Growers Assn	ICF	Sempra Utilities
California Energy Commission	International Power Technology	Southern California Edison Company
California Public Utilities Commission	Intestate Gas Services, Inc.	Southern California Gas Company
California State Association of Counties	Kelly Group	Spark Energy
Calpine	Ken Bohn Consulting	Sun Light & Power
Casner, Steve	Keyes & Fox LLP	Sunshine Design
Cenergy Power	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Center for Biological Diversity	Linde	TerraVerde Renewable Partners
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Tiger Natural Gas, Inc.
City of San Jose	Los Angeles Dept of Water & Power	TransCanada
Clean Power Research	MRW & Associates	Troutman Sanders LLP
Coast Economic Consulting	Manatt Phelps Phillips	Utility Cost Management
Commercial Energy	Marin Energy Authority	Utility Power Solutions
County of Tehama - Department of Public Works	McKenzie & Associates	Utility Specialists
Crossborder Energy	Modesto Irrigation District	Verizon
Crown Road Energy, LLC	Morgan Stanley	Water and Energy Consulting
Davis Wright Tremaine LLP	NLine Energy, Inc.	Wellhead Electric Company
Day Carter Murphy	NRG Solar	Western Manufactured Housing Communities Association (WMA)
Dept of General Services	Office of Ratepayer Advocates	Yep Energy
Don Pickett & Associates, Inc.	OnGrid Solar	
Douglass & Liddell	Pacific Gas and Electric Company	