

PUBLIC UTILITIES COMMISSION

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September 24, 2020

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Subject: Energy Division Disposition Approving with Modifications Southern California Edison Company (SCE) Advice Letter (AL) 3932-E-A, Pacific Gas and Electric Company (PG&E) AL 5463-E-A, and San Diego Gas & Electric Company (SDG&E) 3320-E-A: Proposed Methodology to Categorize and Quantify Solar Complaints Received in Compliance with Decision 18-09-044

Dear Mr. Stern, Ms. Genao, Mr. Jacobson, and Ms. Caulson,

This letter approves the jointly filed advice letters (ALs) 3932-E-A, 5463-E-A, and 3320-E-A on a proposed methodology to categorize and quantify solar complaints in compliance with California Public Utilities Commission (CPUC) Decision (D.)18-09-044 *Adopting Net Energy Metering Consumer Packet Measures Including Solar Information Packet*.

To comply with D.18-09-044 Ordering Paragraph (OP) 6, Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric Company (SDG&E) (the utilities) jointly filed ALs SCE AL 3932-E, PG&E AL 5463-E, and SDG&E AL 3320-E on January 3, 2019. The California Solar & Storage Association (CALSSA) and Solar Energy Industries Association (SEIA) filed a timely protest on January 23, 2019. The utilities filed a timely reply to the protest on January 30, 2019.

On November 8, 2019, the utilities jointly filed supplemental ALs SCE AL 3932-E-A, PG&E AL 5463-E-A, and SDG&E 3320-E-A which replaced the original ALs in their entirety.

CALSSA filed a timely protest on the jointly filed supplemental ALs on November 18, 2019. The utilities jointly filed a timely reply on November 25, 2019.

Energy Division finds the proposed categories in the supplemental advice letter to be reasonable, and therefore CALSSA's and SEIA's protests are rejected. SCE AL 3932-E-A, PG&E AL 5463-E-A, and SDG&E AL 3320-E-A are approved with an effective date of September 24, 2020

Attachment 1 contains a detailed discussion of the background, protests, replies, and staff's determinations.

Please contact Christopher Westling of the Energy Division at christopher.westling@cpuc.ca.gov if you have any questions.

Sincerely,



Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division
California Public Utilities Commission

cc: Joshua Buswell-Charkow, Deputy Director, California Solar & Storage Association
(CALSSA)
Rick Umoff, Senior Director & Counsel, California, Solar Energy Industries Association
(SEIA)
R.14-07-002 Service List

Attachment 1:

Staff Review and Disposition

Background

On October 5, 2018 the California Public Utilities Commission (CPUC) issued (D.)18-09-044 *Decision Adopting Net Energy Metering Consumer Protection Measures Including Solar Information Packet*, which adopted several consumer protections targeted to residential solar customers. Among other things, the Decision directed Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) (the “utilities”) to jointly propose a methodology to categorize and quantify solar complaints they receive from customers.

Ordering Paragraph (OP) 6 of D.18-09-044 states that the utilities shall jointly propose the solar complaint methodology within 90 days after the issue date of D.18-09-044 via a joint Tier 2 advice letter (AL). OP 6 further states that one of the categories must be complaints related to third party providers, broken down into types of complaints.

Per OP 7, within 90 days of the Energy Division disposing the aforementioned joint Tier 2 solar complaint methodology AL, the utilities are directed to submit quarterly information-only ALs to the Energy Division documenting solar complaint trends. The CPUC’s Energy Division Director or his/her/their designee is authorized to change the frequency, submission deadline, and composition of these ALs.

Assembly Bill 1070 (Gonzalez Fletcher, 2017), among other things, mandates that the Contractors State License Board (CSLB) receive complaints from consumers and state agencies regarding solar energy systems companies and solar contractors.¹ AB 1070 also requires the CSLB to compile an annual report documenting consumer complaints related to solar contractors, which will be publicly available on the CSLB and CPUC’s websites.²

D.18-09-044 emphasizes the importance of standardizing solar complaint data within CPUC departments and programs and across the utilities to support the goals of AB 1070. OP 6 of D.18-09-044 states that the utilities shall assist CPUC staff and relevant programs in developing a process to ensure the efficient and accurate collection of data on solar complaints across utilities, including complaints made to the CPUC’s Consumer Affairs Branch and the Community Help and Awareness with Natural Gas and Electricity Services Program (CHANGES), and to streamline the process for forwarding solar complaints related to third party providers to the CSLB.

In accordance with OP 6, the utilities jointly filed SCE AL 3932-E, PG&E AL 5463-E, and SDG&E AL 3320-E on January 3, 2019.

Protests and Replies

¹ AB 1070 (2017), California Business and Professions Code Section 7170(a)

² AB 1070 (2017), California Business and Professions Code Section 7170(b)

The California Solar & Storage Association (CALSSA) and Solar Energy Industries Association (SEIA) filed a timely protest on January 23, 2019 to the joint AL filing. In their protest, CALSSA and SEIA asserted that “solar complaint” should be defined as “an expression of dissatisfaction made by a solar consumer,” rather than the utilities’ definition: “a negative communication from customers who have or are considering adopting solar photovoltaic systems that can be classified into one of the categories described [in the AL].”³ CALSSA also asserted that the IOUs should use the first page of the existing CSLB complaint form⁴ as a template, that the IOUs should ask the customer if they attempted to first contact the solar provider, and finally that other categories should be added to the list (e.g. “Solar Complaints Related to IOU Program Administration”). The utilities filed a timely reply on January 30, 2019. The utilities stated that CALSSA/SEIA’s complaint definition was too broad and leaves too much up to the interpretation of the utilities’ customer service staff. The utilities also noted that they should not be required to track whether the customer has attempted to contact the solar customer, noting that “this step will be difficult for frontline call center staff to capture.”

On November 8, 2019, the utilities jointly filed supplemental ALs 3932-E-A (SCE), 5463-E-A (PG&E), and 3320-E-A (SDG&E), which replaced the original ALs in their entirety. The supplemental incorporates some, but not all, of the complaint categories suggested by CALSSA/SEIA in their protest of the original AL. Complaint categories that were incorporated were a) inappropriate access to customer data, b) misrepresentation or impersonation, c) equipment or workmanship complaints, and d) other (e.g. misrepresentation of solar contract terms or missing/incorrect solar documentation). Complaint categories related to IOU administration and to customer misunderstanding of tariffs were not included.

CALSSA filed a timely protest on the jointly filed supplemental ALs on November 18, 2019. In the protest of the supplemental, CALSSA noted that the categories should not be explicitly limited to third party solar providers based on the language of the Decision. Instead, CALSSA argues that four complaint categories be added related to “solar complaints related to IOU administration,” three complaint categories be added related to the “solar complaints related to tariff understanding,” an additional “other solar complaints” category, and finally a yes/no selection of whether the individual first contacted their solar provider to resolve their complaint.

The utilities filed a timely reply on November 25, 2019. The utilities stated that they determined that tracking NEM-related complaints related to the IOU and to customers’ understanding of tariffs was important, but that based on current customer complaint routing processes, they cannot guarantee that this information will be captured in every instance.

Discussion

Energy Division has reviewed the protests raised by SEIA and CALSSA:

Adding Utility-Specific NEM Complaint Categories

³ SCE AL 2932-E, page 2.

⁴ See <https://www2.cslb.ca.gov/OnlineServices/ConstructionComplaint/ComplaintFormProcess.aspx>

In their protest, CALSSA requests that complaint categories should be added for NEM-related complaints that are directed toward the utilities rather than the solar provider. It is clear that D.18-09-044 was intended to address complaints related to solar providers only, rather than complaints directed at IOUs. For example, the decision states in Section 2.6, “specifically, we require one of the categories to be complaints related to third party solar providers, broken down into types of complaints,” and nowhere in D.18-09-044 is there mention of complaints against utilities. Rather the list of potential complaints by consumers are focused on solar providers⁵. Additionally, Energy Division agrees with the utilities’ assertion that the information-only advice letters are not the correct forum to report these datapoints, as this information is tracked through other processes such as the Rule 21 complaint process and the Interconnection Discussion Forum hosted by the CPUC.

Complaint Definition

While the definitions of “complaint” raised by the utilities and by SEIA/CALSSA are very similar, we agree with the definition proposed by the utilities. We conclude that the utilities’ definition is more accurate, because it is more narrowly defined and it is consistent with Section 2.6 of D.18-09-044. Additionally, it is sufficient to support implementation of the Decision’s directives.

California Contractors State License Board Template

On the issue of whether to use the current CSLB complaint template, Energy Division agrees with the utilities’ that this would be too difficult to implement with their processes and not necessary to achieve the stated goals. The IOUs are able to use their existing processes which are already in place; the use of the CSLB template would add additional and unnecessary implementation costs, including the integration of the form into existing systems and the retraining of call center staff.

Utilities Asking Customer to Contact Solar Provider Directly

In their first protest, SEIA/CALSSA suggested that the utilities should ask the customer to contact their solar provider directly about their complaint. In their responses, the utilities note that they are incorporating the *asking* of this question into the complaint filing process, but noted it would be too difficult for customer service representatives to accurately *track* the customers’ answer to this question and suggest that this information would be better tracked through other venues.

The utilities state in their response to CALSSA’s second protest that “the IOUs’ complaint processes are designed such that call center representatives capture the complaint type at a high level, followed up by a review process to refer complaints to the right areas of the business to address. Therefore, the business area compiling the report of solar complaints described in Advice 3932-E-A et al. may or may not have the necessary information to determine whether a customer contacted their solar provider.” The utilities go on to state that, “the IOUs believe that it is more

⁵ Section 2.1 of the decision describes the following types of consumer protection issues: aggressive and misleading sales practices, misrepresentation of the utilities role, confusing and incomplete information presented to the customer on the costs and benefits of solar, predatory financing, vendor failure to follow through after installation and unlicensed contractors.

effective to recommend customers contact their solar providers (or others) where relevant, rather than capture a snapshot in time of whether or not a customer contacted their solar provider before contacting their utility.”

Energy Division agrees with the utilities that it will be too difficult to include a data field about this based on how complaints are processed. Energy Division finds the proposed categories in the supplemental advice letter to be reasonable, and therefore CALSSA’s and SEIA’s protests are rejected.

November 8, 2019

ADVICE 3932-E-A
(Southern California Edison Company - U 338-E)

ADVICE 5463-E-A
(Pacific Gas and Electric Company – U 39 E)

ADVICE 3320-E-A
(San Diego Gas & Electric Company – U 902 E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Supplemental Advice Letter to Advice 3932-E et al, Proposed
Methodology to Categorize and Quantify Solar Complaints
Received in Compliance with Decision 18-09-044

In compliance with Ordering Paragraph (OP) 6 of Decision (D.)18-09-044, Southern California Edison Company (SCE), on behalf of itself, Pacific Gas and Electric Company (PG&E), and San Diego Gas & Electric Company (SDG&E) (jointly, the investor-owned utilities, or IOUs), hereby resubmits a methodology for categorizing and quantifying customer complaints related to solar that are received by the IOUs.

PURPOSE

The purpose of this supplemental advice letter is to provide a methodology for categorizing and quantifying customer complaints related to solar that are received by the IOUs pursuant to OP 6 of D.18-09-044. This supplemental advice letter will replace Advice 3932-E et al in its entirety.

BACKGROUND

Assembly Bill (AB) 1070 (Stats. 2017, Chap. 662)¹ requires, among other things, the Contractors State License Board (CSLB) to receive and review customer complaints and questions regarding solar energy companies and solar contractors, and publish an annual report documenting customer complaints related to solar, beginning July 1, 2019. In OP 6 of D.18-09-044, the Commission directs the IOUs to support these consumer protection measures by submitting a Tier 2 advice letter within 90 days of the issuance of D.18-09-044 proposing a method for categorizing and quantifying customer complaints related to solar on a quarterly basis. The proposed methodology is intended to be used in information-only advice letters submitted quarterly by the IOUs, pursuant to OP 7 of D.18-09-044. The IOUs are also directed to include a category of complaints related to third party providers, broken down into types of complaints. OP 6 also requires the IOUs to assist the Commission, to the extent requested, in developing a process for collecting data on solar complaints efficiently and accurately, and for providing this information to the CSLB.

After joint IOU submission of Advice 3932-E et al on January 3, 2019, the IOUs are submitting this supplemental advice letter to replace their original submission. This supplemental advice letter is based on feedback received by Energy Division staff that was informed by separate meetings that they held with the CSLB on the CSLB's reporting requirements resulting from AB 1070, along with the feedback from the joint Solar Agency Task Force complaint working group.

DISCUSSION

The IOUs propose that the scope of complaints categorized, quantified, and reported to the CPUC encompass customer complaints associated predominantly with third party solar providers and related to customer experience with exploring or adopting solar photovoltaic systems.

Proposed Method for Tracking Solar Complaints

D.18-09-044 does not specify the criteria that the IOUs should use to identify a communication to the IOUs as a "complaint," and each IOU has different criteria for determining what would be considered a complaint from a customer. For the purposes of complying with the directives in OP 6 and OP 7, the IOUs propose to define a complaint as a negative communication from customers who have or are considering adopting solar photovoltaic systems that can be classified into one of the categories described below.

The IOUs can receive complaints via several different channels, including through their call centers and program staff. The IOUs will collect these complaints and aim to

¹ Full text is available at http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB1070.

standardize categorization of these complaints as much as possible to assist the Commission in identifying statewide trends.

Because the bulk of complaints arrive via call centers, whose staff is trained to quickly respond to a wide variety of business-related customer concerns, any reporting approach specifically related to solar consumer complaints must rely on simple, overarching categories for characterizing complaints in order for these vital representatives to accurately and effectively support the reporting process. Call center representatives are provided with scripts and other resources of information in order to engage with customer concerns.

Their focus is on documentation and resolution of issues more so than reporting. These issues are routed to a centralized repository for management, tracking, and rerouting. An accurate and effective capture of customer complaints by utility call center staff is not just critical for meeting new reporting requirements, but also instigating subsequent steps that support complaint resolution or other actions. These steps include internal routing of complaints to relevant subject matter experts, and advising customers call their solar company directly in the case of contract, loan, or other disputes tied to financial agreements.

Moving forward, the IOUs plan to refer customers to the CSLB, DBO, or CPUC Consumer Affairs department for matters under those entities' jurisdictions when relevant, especially for (but not limited to) solar developer financial disputes identified by customers.

Complaint Categories

The proposed complaint categories are informed by the IOUs' records of complaints received and by the regulatory record. In the regulatory record, information on the types of complaints typically communicated by solar customers was available from:

- Feedback collected at the October 20, 2016 workshop on consumer protection issues;
- Party comments responding to the "Administrative Law Judge's Ruling Seeking Comment on Consumer Protection and Related Issues," filed December 8, 2016;
- A workshop and written comments summarized in the "Final Report Prepared by Pacific Gas and Electric Company on the Solar Consumer Protection Forum Held in Huron, California on July 10, 2018, Pursuant to the Ruling of ALJ Valerie Kao," filed August 31, 2018;
- Party comments on the proposed decision that resulted in D.18-09-044.

Furthermore, since submitting Advice 3932-E et al based on the above regulatory record, the IOUs received feedback from Energy Division staff informed by interactions with various parties. This supplemental advice letter responds to that feedback in the best manner the IOUs believe possible to enable customer call center representatives

to support this reporting process, recognizing the need to tie solar complaint reporting to existing processes described above.

The IOUs determined the best overall path to take was to simplify and streamline categories of complaints to be captured. The IOUs believe the proposed categories represent a significant number of key classification options relevant to solar consumer protection while remaining manageable for classification by solar call representatives. Any major trends that emerge would benefit from the next level of in-depth investigation by the CPUC, CSLB, DBO, or other relevant agencies.

The IOUs propose the following categories of consumer complaints related to solar:

A. Inappropriate Access to Customer Data

- Solar company use of IOUs' emergency help line to access customer data inappropriately
- Solar company use of customers' online My/Your Account portal or otherwise impersonating a customer

B. Misrepresentation or impersonation

- Solar company impersonating an IOU representative or partner, misuse of IOUs' brand or logo
- Solar company impersonating a government agency representative

C. Equipment or Workmanship Complaints

- Solar company unresponsive regarding equipment or workmanship issues
- System never permitted to interconnect by applicable IOU

D. Other

- Misrepresentation of solar contract terms
- Other missing or incorrect solar documentation

Tracking and reporting of these categories is intended to help identify customer complaints with solar companies, in alignment with IOU understanding of D.18-09-044's intent to focus on preventing inappropriate business practices by solar providers. The IOUs did not include categories related to interconnection and Net Energy Metering program processes as IOU program performance has been and will be further tracked through (i) the Rule 21 complaint process, (ii) the Interconnection Discussion Forum hosted by the CPUC, and (iii) project interconnection timing reporting under development via Working Group 2 and R.17-07-07. Metrics tracked through these initiatives will be far more data-driven and relevant for policy-making than tags from solar call representatives.

No cost information is required for this advice letter.

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

TIER DESIGNATION

Pursuant to OP 6 of D.18-09-044, this advice letter is submitted with a Tier 2 designation, the same tier designation as Advice 3932-E.

EFFECTIVE DATE

This supplemental advice letter will become effective on February 2, 2019, the same requested date as Advice 3932-E.

NOTICE

Anyone wishing to protest this advice letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 10 days after the date of this advice letter which is November 18, 2019. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-9645
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Laura Genao
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Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Megan Caulson
Regulatory Tariff Manager
San Diego Gas & Electric Company
8330 Century Park Court, CP31F
San Diego, CA 92123-1548
E-mail: mcaulson@semprautilities.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B and R.14-07-002 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the advice letter at SCE's corporate headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Anuj Desai at (626) 302-0673 or by electronic mail at Anuj.desai@sce.com.

Southern California Edison Company

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.

GAS:ad/ff:jm



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Darrah Morgan
 Phone #: (626) 302-2086
 E-mail: AdviceTariffManager@sce.com
 E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE
 ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 3932-E-A

Tier Designation: 2

Subject of AL: Supplemental Advice Letter to Advice 3932-E et al, Proposed Methodology to Categorize and Quantify Solar Complaints Received in Compliance with Decision 18-09-044

Keywords (choose from CPUC listing): Compliance, Solar

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision 18-09-044

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 AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 2/2/19

No. of tariff sheets: -0-

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets: None

¹Discuss in AL if more space is needed.

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

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

Name: Gary A. Stern, Ph.D.
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Name: Laura Genao c/o Karyn Gansecki
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Facsimile (xxx) xxx-xxxx: (415) 929-5544
Email: karyn.gansecki@sce.com

ENERGY Advice Letter Keywords

| | | |
|---------------------------|--|--------------------------------|
| Affiliate | Direct Access | Preliminary Statement |
| Agreements | Disconnect Service | Procurement |
| Agriculture | ECAC / Energy Cost Adjustment | Qualifying Facility |
| Avoided Cost | EOR / Enhanced Oil Recovery | Rebates |
| Balancing Account | Energy Charge | Refunds |
| Baseline | Energy Efficiency | Reliability |
| Bilingual | Establish Service | Re-MAT/Bio-MAT |
| Billings | Expand Service Area | Revenue Allocation |
| Bioenergy | Forms | Rule 21 |
| Brokerage Fees | Franchise Fee / User Tax | Rules |
| CARE | G.O. 131-D | Section 851 |
| CPUC Reimbursement Fee | GRC / General Rate Case | Self Generation |
| Capacity | Hazardous Waste | Service Area Map |
| Cogeneration | Increase Rates | Service Outage |
| Compliance | Interruptible Service | Solar |
| Conditions of Service | Interutility Transportation | Standby Service |
| Connection | LIEE / Low-Income Energy Efficiency | Storage |
| Conservation | LIRA / Low-Income Ratepayer Assistance | Street Lights |
| Consolidate Tariffs | Late Payment Charge | Surcharges |
| Contracts | Line Extensions | Tariffs |
| Core | Memorandum Account | Taxes |
| Credit | Metered Energy Efficiency | Text Changes |
| Curtable Service | Metering | Transformer |
| Customer Charge | Mobile Home Parks | Transition Cost |
| Customer Owned Generation | Name Change | Transmission Lines |
| Decrease Rates | Non-Core | Transportation Electrification |
| Demand Charge | Non-firm Service Contracts | Transportation Rates |
| Demand Side Fund | Nuclear | Undergrounding |
| Demand Side Management | Oil Pipelines | Voltage Discount |
| Demand Side Response | PBR / Performance Based Ratemaking | Wind Power |
| Deposits | Portfolio | Withdrawal of Service |
| Depreciation | Power Lines | |

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

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