

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



May 10, 2019

Advice Letter 5525-E

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**SUBJECT: Revise Electric Schedule EV to Increase the Participation Limit from
60,000 to 70,000**

Dear Mr. Jacobson:

Advice Letter 5525-E is effective as of May 17, 2019.

Sincerely,

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

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division



Erik Jacobson
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

April 17, 2019

Advice 5525-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Revise Electric Schedule EV to Increase the Participation Limit from 60,000 to 70,000.

Purpose

Pacific Gas and Electric Company (PG&E) requests authorization to increase the participation limit in Electric Schedule EV from its current level of 60,000 participants to 70,000 participants. The required tariff change is provided in Attachment 1.

Summary

On August 9, 2018, the California Public Utilities Commission (CPUC or Commission) issued Decision (D.)18-08-013 in PG&E's Application to Revise Its Electric Marginal Costs, Revenue Allocation, and Rate Design (Application (A.) 16-06-013). The decision approved various settlement agreements that make significant changes to PG&E's rate designs. One of the approved agreements was the Residential Rate Design Settlement which included a revised eligibility requirement for residential electric vehicle (EV) charging rates. Specifically, the current participation limit of 60,000 customers on Electric Schedule EV was replaced with a requirement that customers who are served on residential EV charging rates cannot exceed 800 percent of baseline (for both the current Electric Schedule EV and the new residential EV charging rate). In Advice Letter 5523-E, submitted on April 12, 2019, PG&E requested revisions to the currently effective Electric Schedule EV to provide that, concurrent with the availability of the new residential EV charging rate (expected beginning on July 1, 2019), customers served on Rate EV-A or EV-B cannot exceed 800% of their annual baseline allowance. As discussed further below, in this Advice Letter PG&E proposes to expand from 60,000 to 70,000 the participation limit on the current Electric Schedule EV to avoid the possibility that it could be closed to new customers as a result of reaching the 60,000 limit before the new EV charging rates adopted by D.18-08-013 become available, expected to take place on July 1, 2019.

Because it is possible PG&E's enrollment level may exceed the current 60,000 limit as early as late May 2019, PG&E respectfully requests that the Commission provide its

disposition letter promptly by the requested effective date set forth herein, in order to ensure Electric Schedule EV remains open to new customers until July 1, 2019.

Development of the EV Charging Rate and Limit on Participation

In Advice Letter 3910-E on September 26, 2011, PG&E submitted revisions to its then-current residential EV charging rate, Electric Schedule E-9, in accordance with D.11-07-029. PG&E's advice letter was protested by over 75 parties. On November 14, 2011, PG&E replied to the protests and supplemented its original submittal with Advice Letter 3910-E-A on May 9, 2012. Instead of simply revising the provisions of Electric Schedule E-9, Advice Letter 3910-E-A created a new Electric Schedule EV and allowed Electric Schedule E-9 to remain in place for a limited period. As part of Advice Letter 3910-E-A, PG&E proposed a participation limit of 30,000 customers on the schedule. On June 5, 2012, PG&E responded to a limited number of protests, including the proposed participation limit, in which PG&E provided:

"PG&E has offered Schedule EV as an experimental rate option with a participation limit because the Commission intends to revisit the rates for EV charging in the 2014 GRC. PG&E believes that the participation limitation can be reviewed at that time. In addition, given the current level of EV adoptions (approximately 3,000 through March 2012), PG&E's high estimate of EV adoption through 2014 is roughly 20,000 EVs. Therefore, PG&E believes that a 30,000 cap on participation should be sufficient to accommodate EVs through this time period."

On August 23, 2012, by Resolution E-4508, the Commission adopted PG&E's proposal for the new Electric Schedule EV.

PG&E's Electric Schedule EV rates were next considered in its 2014 GRC Phase II proceeding. In D.15-08-005, the CPUC approved a residential rate design settlement that addressed EV charging rate issues. Specifically, that settlement provided:

"The EV Settling Parties have analyzed and discussed the issue, and have agreed that Schedule EV rates designed based on the pre-existing rate design satisfy the requirements of D.11-07-029 and retain the non-tiered TOU rate design option favored by the Commission for EV rate design. This approach is reasonable because: (1) PG&E only recently implemented a new Schedule EV (in August 2013), (2) load research efforts to date are not yet robust enough to be used as a basis for changes to the existing rate design on this schedule (see Exhibit PG&E-4, page 3-40), and (3) structural changes to the rate such as adding a customer charge as PG&E had proposed in its GRC Phase II testimony, or introducing a baseline credit as ORA would propose, are more appropriately considered in the Residential Rate OIR." (p. xiii).

While Electric Schedule EV rates were fully reviewed in PG&E's 2014 GRC Phase II, the parties' settlement did not expressly address the limit on participation. On April 25, 2016, PG&E submitted Advice Letter 4830-E which indicated that the enrollment on the rate

was approaching the limit of 30,000 customers and requested that the limit on participation be eliminated until the rate could be reviewed in Phase II of the 2017 GRC.

The Public Advocates Office (PAO), formerly known as Office of Ratepayer Advocates (ORA), did not protest Advice Letter 4830-E, but instead worked with PG&E to review PG&E's request. After discussions with PAO, PG&E and PAO agreed to set the participation limit at 60,000 customers, rather than eliminating it entirely. On June 6, 2016, PG&E submitted Supplemental Advice Letter 4830-E-A to reflect the agreement with PAO. Specifically, rather than eliminating the 30,000-participation limit, PG&E proposed that it be replaced by a 60,000 limit that could be reviewed in the 2017 GRC Phase II. The revised participation limit was approved by a letter from the Energy Division's Director, dated August 1, 2016.

Replacement of EV Participation Limit and the Increase in Electric Schedule EV Adoption

On August 9, 2018, the Commission issued Decision (D.) 18-08-013 in PG&E's 2017 GRC Phase II proceeding. The decision adopted various settlement agreements that made significant changes to PG&E's rate designs, including the Residential Rate Design Settlement which approved a new EV charging rate with a revised eligibility requirement. Specifically, the participation limit of 60,000 customers on Electric Schedule EV was replaced with a requirement that the total electric usage on the EV charging rates cannot exceed 800 percent of baseline.

When the parties reached their settlement on the new EV charging rate's eligibility in the 2017 GRC Phase II, it was not anticipated that the pace of EV adoption would likely result in the prior 60,000 limit being reached before the new EV charging rate could be implemented. However, since the settlement was reached, there has been an increased pace of adoption of EVs such that, as of March 2019, there were already almost 56,000 customers on PG&E's existing Electric Schedule EV rates (55,534 on EV-A and 366 on EV-B). The average Electric Schedule EV enrollment for the six months ending March 31, 2019, shows an updated pace of approximately 1,200 new enrollments per month. If this pace continues, PG&E will likely reach 60,000 enrollments as early as May, but more likely in June or possibly as late as July 2019.¹ PG&E would prefer to avoid the potential for a temporary closure of Electric Schedule EV for a period of weeks before July 1, as this would result in a negative customer experience for those acquiring an EV in the second quarter 2019, and could undercut the State's vehicle electrification and greenhouse gas reduction policy goals.

¹ However, if the pace of EV adoption is lower than the prior six-month average, this number of customers exceeding the participation limit would also be lower and could result in the 60,000 enrollment limit not being exceeded before July 1, 2019.

Request to Increase the Electric Schedule EV Participation Limit

On April 5, 2019, PG&E submitted a letter to the Executive Director requesting that PG&E's Electric Schedule EV (EV-A) be closed to new customers on a date-certain to coincide with the effective date for PG&E's new EV charging rate, adopted in D.18-08-013, expected to happen on July 1, 2019. Approval by the Executive Director would ensure that Electric Schedule EV is not closed to new enrollment prematurely in the event that the participation on the Schedule were to temporarily exceed its current cap of 60,000 customers. Under this approach, PG&E could have continued to allow customers to enroll beyond the 60,000 limit, anticipating that this exceedance would only occur for at most one or two months, at which point eligible customers will begin to be transitioned off of the existing Schedule EV-A.

On April 8, 2019 the Energy Division recommended that a more appropriate procedural approach would be for PG&E to submit a Tier 2 advice letter to increase the participation limit from 60,000 to 70,000. Accordingly, in this Advice Letter, PG&E requests an increase in the limit on participation in Electric Schedule EV from 60,000 to 70,000 to avoid the possibility that the current Electric Schedule EV rate would need to be closed to new enrollment before July 1, 2019. Approval of this request supports the CPUC's and the State's strong policy of encouraging accelerated adoption of EVs to help California achieve its greenhouse gas reduction goals.

Tariff Revisions

Revisions to Electric Schedule EV are provided in Attachment 1. For your convenience, redlined versions of the tariff revisions are included as Attachment 2. In addition to the revisions proposed in this Advice Letter, PG&E included revisions that are currently waiting for CPUC approval from Advice Letter 5499-E and Advice Letter 5523-E, which are both designated as Tier 1 advice letters.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than May 7, 2019, which is 20 days after the date of this submittal. 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 B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
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

Pursuant to General Order (GO) 96-B, Rule 5.2, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, May 17, 2019, which is 30 calendar days after the date of submittal.

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 list for R.18-12-006 and A.16-06-013. 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 submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

_____/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.18-12-006 and A.16-06-013



ADVICE LETTER 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 WATER
 PLC HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5525-E

Tier Designation: 2

Subject of AL: Revise Electric Schedule EV to Increase the Participation Limit from 60,000 to 70,000

Keywords (choose from CPUC listing): Compliance, Tariffs

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.18-08-013

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:

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: 5/17/19

No. of tariff sheets: 3

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: Electric Schedule EV

Service affected and changes proposed¹: N/A

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

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: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
44048-E	ELECTRIC SCHEDULE EV RESIDENTIAL TIME-OF-USE SERVICE FOR PLUG-IN ELECTRIC VEHICLE CUSTOMERS Sheet 1	44044-E
44049-E	ELECTRIC TABLE OF CONTENTS Sheet 1	44046-E
44050-E	ELECTRIC TABLE OF CONTENTS Sheet 2	44047-E



**ELECTRIC SCHEDULE EV
RESIDENTIAL TIME-OF-USE
SERVICE FOR PLUG-IN ELECTRIC VEHICLE CUSTOMERS**

Sheet 1

APPLICABILITY: This optional experimental schedule applies to electric service to customers for whom Schedule E-1 applies and who have a currently registered Motor Vehicle, as defined by the California Motor Vehicle Code, which is a battery electric vehicle (BEV) or plug-in hybrid electric vehicle (PHEV) recharged via a recharging outlet at the customer's premises. This schedule is not available to customers with a conventional, charge sustaining (battery recharged solely from the vehicle's on-board generator) hybrid electric vehicle (HEV). Low speed electric vehicles and electrically powered motorcycles or bicycles, as defined by the California Motor Vehicle Code, are not eligible for this rate option. This rate schedule is subject to an enrollment cap of 70,000. Service under this schedule is provided at the sole option of PG&E and based upon the availability of metering equipment and customer infrastructure improvements necessary for charging. Regardless of the level of participation, Rate A of Schedule EV will be closed to new enrollment on the later of July 1, 2019 or the date the new electric vehicle charging rate adopted by D.18-08-013 is available for enrollment. (T)
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(P)

Beginning on the later of July 1, 2019 or the date the new electric vehicle charging rate becomes available for enrollment, customers taking service on Rate A or Rate B of this rate schedule cannot exceed 800% of their annual baseline allowance, measured as the total usage for the customer over the last 12 months divided by the total annual baseline allowance using the approved baseline allowances for those months. Customers at premises with total usage in excess of 800 percent of baseline over 12 months will be moved to Schedule E-TOU-B and will be prohibited from taking service on any electric vehicle rate schedule for 12 months. Customers must have 12 months of consecutive usage on this Rate Schedule before being subject to the requirement of being moved from Schedule EV to Schedule E-TOU-B as a result of exceeding the 800 percent of baseline 12-month threshold. (P)
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The provisions of Schedule S—Standby Service Special Conditions 1 through 6 shall also apply to customers whose premises are regularly supplied in part (but not in whole) by electric energy from a nonutility source of supply. These customers will pay monthly reservation charges as specified under Section 1 of Schedule S, in addition to all applicable Schedule EV charges. See Special Condition 6 of this rate schedule for exemptions to standby charges.

Depending on the manner in which customers will fuel their vehicle, one of the following rates will apply:

Rate A: Applies to all applicable customers unless they qualify for and choose Rate B.

Rate B: Applies to all applicable customers with a separately metered BEV or PHEV recharging outlet.

TERRITORY: This rate schedule applies everywhere PG&E provides electric service.

RATES: Total bundled service charges are calculated using the total rates below. Customers on this schedule are subject to the delivery minimum bill amount shown below applied to the delivery portion of the bill (i.e. to all rate components other than the generation rate). In addition, total bundled charges will include applicable generation charges per kWh for all kWh usage.

Direct Access (DA) and Community Choice Aggregation (CCA) charges shall be calculated in accordance with the paragraph in this rate schedule titled Billing.

(Continued)



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Sheet 1

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Preliminary Statements.....	43883,40534,42856*,43670,41723,40591,44040-E		
Rules.....	43022,43023,43210-E		
Maps, Contracts and Deviations.....	37960-E		
Sample Forms...40925*,37631,41151*,41573*, 37632,41152*,41153,37769,44035,40671,37169-E			

(Continued)

Advice 5525-E
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

April 17, 2019



ELECTRIC TABLE OF CONTENTS

Sheet 2

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
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E-6	Residential Time-of-Use Service.....	36613, 43990, 43774, 43412, 36474, 40853, 43775-E
EV	Residential Time-of-Use Service for Plug-In Electric Vehicle Customers	44009, 43840, 43841, 33673, 43842, 32732-E

(Continued)

Advice Decision 5525-E

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted Effective Resolution

April 17, 2019

Advice 5525-E
April 17, 2019

Attachment 2

Redlined Tariff

ELECTRIC SCHEDULE EV
RESIDENTIAL TIME-OF-USE
SERVICE FOR PLUG-IN ELECTRIC VEHICLE CUSTOMERS

Sheet 1

APPLICABILITY: This optional experimental schedule applies to electric service to customers for whom Schedule E-1 applies and who have a currently registered Motor Vehicle, as defined by the California Motor Vehicle Code, which is a battery electric vehicle (BEV) or plug-in hybrid electric vehicle (PHEV) recharged via a recharging outlet at the customer's premises. This schedule is not available to customers with a conventional, charge sustaining (battery recharged solely from the vehicle's on-board generator) hybrid electric vehicle (HEV). Low speed electric vehicles and electrically powered motorcycles or bicycles, as defined by the California Motor Vehicle Code, are not eligible for this rate option. This rate schedule is subject to an enrollment cap of 760,000. Service under this schedule is provided at the sole option of PG&E and based upon the availability of metering equipment and customer infrastructure improvements necessary for charging. Regardless of the level of participation, Rate A of Schedule EV will be closed to new enrollment on the later of July 1, 2019 or the date the new electric vehicle charging rate adopted by D.18-08-013 is available for enrollment.

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Beginning on the later of July 1, 2019 or the date the new electric vehicle charging rate becomes available for enrollment, customers taking service on Rate A or Rate B of this rate schedule cannot exceed 800% of their annual baseline allowance, measured as the total usage for the customer over the last 12 months divided by the total annual baseline allowance using the approved baseline allowances for those months. Customers at premises with total usage in excess of 800 percent of baseline over 12 months will be moved to Schedule E-TOU-B and will be prohibited from taking service on any electric vehicle rate schedule for 12 months. Customers must have 12 months of consecutive usage on this Rate Schedule before being subject to the requirement of being moved from Schedule EV to Schedule E-TOU-B as a result of exceeding the 800 percent of baseline 12-month threshold.

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The provisions of Schedule S—Standby Service Special Conditions 1 through 6 shall also apply to customers whose premises are regularly supplied in part (but not in whole) by electric energy from a nonutility source of supply. These customers will pay monthly reservation charges as specified under Section 1 of Schedule S, in addition to all applicable Schedule EV charges. See Special Condition 6 of this rate schedule for exemptions to standby charges.

Depending on the manner in which customers will fuel their vehicle, one of the following rates will apply:

Rate A: Applies to all applicable customers unless they qualify for and choose Rate B.

Rate B: Applies to all applicable customers with a separately metered BEV or PHEV recharging outlet.

TERRITORY: This rate schedule applies everywhere PG&E provides electric service.

RATES: Total bundled service charges are calculated using the total rates below. Customers on this schedule are subject to the delivery minimum bill amount shown below applied to the delivery portion of the bill (i.e. to all rate components other than the generation rate). In addition, total bundled charges will include applicable generation charges per kWh for all kWh usage.

Direct Access (DA) and Community Choice Aggregation (CCA) charges shall be calculated in accordance with the paragraph in this rate schedule titled Billing.

(Continued)

<i>Advice</i>	5523-E	<i>Issued by</i>	<i>Submitted</i>	April 12, 2019
<i>Decision</i>		Robert S. Kenney	<i>Effective</i>	April 12, 2019
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	

**PG&E Gas and Electric
Advice Filing 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	Regulatory & Cogeneration Service, Inc.
	Energy Management Service	SCD Energy Solutions
Alta Power Group, LLC	Evaluation + Strategy for Social	
Anderson & Poole	Innovation	
	GenOn Energy, Inc.	SCE
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz &	SDG&E and SoCalGas
BART	Ritchie	
	Green Charge Networks	SPURR
Barkovich & Yap, Inc.	Green Power Institute	San Francisco Water Power and Sewer
P.C. 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
	Keyes & Fox LLP	Sunshine Design
Cameron-Daniel, P.C.	Leviton Manufacturing Co., Inc.	Tecogen, Inc.
Casner, Steve	Linde	TerraVerde Renewable Partners
Cenergy Power	Los Angeles County Integrated Waste	Tiger Natural Gas, Inc.
Center for Biological Diversity	Management Task Force	
City of Palo Alto	Los Angeles Dept of Water & Power	TransCanada
	MRW & Associates	Troutman Sanders LLP
City of San Jose	Manatt Phelps Phillips	Utility Cost Management
Clean Power Research	Marin Energy Authority	Utility Power Solutions
Coast Economic Consulting	McKenzie & Associates	Utility Specialists
Commercial Energy		
County of Tehama - Department of Public	Modesto Irrigation District	Verizon
Works	Morgan Stanley	Water and Energy Consulting
Crossborder Energy	NLine Energy, Inc.	Wellhead Electric Company
Crown Road Energy, LLC	NRG Solar	Western Manufactured Housing
Davis Wright Tremaine LLP		Communities Association (WMA)
Day Carter Murphy	Office of Ratepayer Advocates	Yep Energy
	OnGrid Solar	
Dept of General Services	Pacific Gas and Electric Company	
Don Pickett & Associates, Inc.		
Douglass & Liddell		