

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



July 11, 2019

**Advice Letter 5559-G**

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: Update to Electric Schedules NEM and NEM2 to Maintain Scheduled Annual True-Up When Storage is Added to an Existing NEM/NEM2 Generating Facility (Estimation Methodology)**

Dear Mr. Jacobson:

Advice Letter 5559-G is effective as of July 14, 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

June 14, 2019

**Advice 5559-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Update to Electric Schedules NEM and NEM2 to Maintain Scheduled Annual True-Up When Storage is Added to an Existing NEM/NEM2 Generating Facility (Estimation Methodology)**

**Purpose**

Pacific Gas and Electric Company (PG&E) respectfully requests to make changes to its Net Energy Metering (NEM) Tariffs (Electric Rate Schedules NEM and NEM2) to maintain the scheduled annual True-Up to existing NEM/NEM2 accounts with generating facilities that add storage and meet the eligibility requirements to use the NEM-Paired Storage estimation methodology. This change is to align PG&E tariffs with those of Southern California Edison and San Diego Gas & Electric that also maintain the scheduled annual True-Up for these customers.

**Background**

PG&E's Advice Letter 2888-E-A<sup>1</sup> (approved May 2, 2007) was submitted to comply with Commission Resolution E-3992<sup>2</sup> and Decision (D.) 05-08-013<sup>3</sup>, which stated that "in order to assure that non-NEM generators do not receive NEM credits, any DG operating a combined technology DG facility must install, at its cost, metering for the separation of energy measurements of NEM and non-NEM generators or relays that prevent export from the non-NEM generators at all times, unless an export agreement is executed."<sup>4</sup> AL 2888-E included the following changes to the NEM tariff:

*Customer-generators with Multiple Tariff Facilities with existing NEM, NEMBIO and/or NEMFC eligible generators interconnecting additional generators, will receive a bill true-up prior to taking service under Special Condition 6. This ensures*

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<sup>1</sup> [https://www.pge.com/nots/rates/tariffs/tm2/pdf/ELEC\\_2888-E-A.pdf](https://www.pge.com/nots/rates/tariffs/tm2/pdf/ELEC_2888-E-A.pdf)

<sup>2</sup> [http://docs.cpuc.ca.gov/PublishedDocs/WORD\\_PDF/FINAL\\_RESOLUTION/58470.PDF](http://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_RESOLUTION/58470.PDF)

<sup>3</sup> *Interim Opinion Adopting Changes In Interconnection Rules For Distributed Generation*  
<Http://Docs.Cpuc.Ca.Gov/Published/Graphics/48945.Pdf>

<sup>4</sup> P. 14

*that all NEM accounts have the same Relevant Period, as defined in Special Condition 2, going forward.*

In 2014, the California Public Utilities Commission (“CPUC” or “Commission”) issued D.14-05-033<sup>5</sup>, distinguishing “NEM-Paired storage” from NEM Multiple Tariff (NEMMT). That decision modified D.05-08-013 to permit certain small grid-charged batteries tied to NEM-eligible generation to avoid various utility charges, including the \$800 interconnection application fee. Moreover, the Decision concluded that for certain smaller projects, separation of NEM-eligible and non-NEM eligible generation would be done via an estimating methodology<sup>6</sup> instead of multiple meters. Simultaneously, the Decision determined that qualifying large NEM-eligible generation facilities (with paired storage systems larger than 10 kW (AC)) were required to adhere to metering requirements similar to those in the NEM-MT tariff to ensure that only NEM-eligible generation receives NEM credit. However, no changes to the true-up provisions in the NEM tariff were included in D.14-05-033, or in D.19-01-030<sup>7</sup>, which further addressed NEM-paired storage interconnection issues. Thus, PG&E continued its practice of requiring a true-up for existing NEM customers that added storage.

In the first quarter of 2019, the Energy Division of the CPUC contacted PG&E to understand its practice of requiring a true-up for these instances and to explore whether it was possible for PG&E to easily modify this practice.

## **Discussion**

In response to the Energy Division’s outreach, PG&E clarified that, in addition to this practice being approved in Electric Schedules NEM and NEM2, the architecture of PG&E’s billing system does not have a mechanism that can transfer banked charges or credits across various billing methodologies. For this reason, a True-Up was being done. To confirm, PG&E agrees conceptually that existing NEM customers who only add storage should not experience a True-Up. However, updating the very architecture of the billing system to accommodate this, including the ability to address all of the possible permutations, would be both expensive and require extensive time to develop.

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<sup>5</sup> *Decision Regarding Net Energy Metering Interconnection Eligibility For Storage Devices Paired With Net Energy Metering Generation Facilities*

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M091/K251/91251428.PDF>

<sup>6</sup> “Small Net Energy Metering (NEM)-eligible generating facilities, those with NEM paired storage devices sized at 10 kilowatts alternating current or less, shall utilize an estimation methodology based on a presumed generation profile of the generating facility’s NEM generator as adopted by the Commission subsequent to this decision.” (D. 14-05-033 Ordering Paragraph 5). Note: D.19-01-030 modified Ordering Paragraph 5 to remove “alternating current”.

<sup>7</sup> *Decision Granting Petition For Modification Of Decision 14-05-033 Regarding Storage Devices Paired With Net Energy Metering Generating Facilities*

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M263/K673/263673087.PDF>

Therefore, PG&E proposes to assist these customers by maintaining them on their existing NEM program until their scheduled True-Up via a manual tracking system. Then, at the scheduled True-Up, PG&E would transition them to NEM-Paired Storage.

For a NEM-paired storage customer with storage no larger than 10kW, the difference in billing using estimated versus metered generation is generally insignificant. Therefore, PG&E believes that net energy metering integrity is preserved if these customers stay on NEM until their true-up as long as they are eligible for, and elect to use, the estimation methodology.

If approved, PG&E will update its existing NEM2 Tariff language to state the following:

*Existing customer-generators being billed under sub-schedules NEM2S, NEM2EXP, NEM2EXPM, or NEM2A who only add storage and are eligible to use the estimation methodology described in Special Condition 9 (“NEM Paired Storage”) will be billed using the estimation methodology as of their scheduled True-Up, provided that a True-Up is not required for any other reason. All other customer-generators with Multiple Tariff or NEM Paired Storage Facilities with existing NEM2 eligible generators interconnecting additional generators or storage, will receive a bill true-up prior to taking service under Special Condition 4. This ensures that all NEM2 accounts have the same Relevant Period, as defined in Special Condition 2, going forward.*

Similar modifications will be made to the NEM Tariff.

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than July 5, 2019, which is 21 days<sup>8</sup> after the date of this submittal. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> 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.

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<sup>8</sup> The 20-day protest period concludes on a holiday, therefore, PG&E is moving this date to the following business day.

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**

PG&E requests that this Tier 2 advice submittal become effective on regular notice, July 14, 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.14-07-002 and R.12-11-005. 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 lists for R.14-07-002 and R.12-11-005



# 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) #: 5559-E

Tier Designation: 2

Subject of AL: Update to Electric Schedules NEM and NEM2 to Maintain Scheduled Annual True-Up When Storage is Added to an Existing NEM/NEM2 Generating Facility (Estimation Methodology)

Keywords (choose from CPUC listing): Compliance, Metering

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

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

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

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

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: 7/14/19

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).

Tariff schedules affected: Electric Schedules NEM, Electric Schedules NEM2

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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](mailto: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.
44459-E	ELECTRIC SCHEDULE NEM NET ENERGY METERING SERVICE Sheet 5	33901-E*
44460-E	ELECTRIC SCHEDULE NEM2 NET ENERGY METERING SERVICE Sheet 5	37799-E
44461-E	ELECTRIC TABLE OF CONTENTS Sheet 1	44451-E
44462-E	ELECTRIC TABLE OF CONTENTS Sheet 6	44175-E



**ELECTRIC SCHEDULE NEM  
NET ENERGY METERING SERVICE**

Sheet 5

**APPLICABILITY: Demand Response Programs -**

(Cont'd.)

For Load Aggregation pursuant to Special Condition 7, Aggregated Accounts, including the Generating Account, are eligible for the same demand response programs and solar tariffs as NEM customers. Demand response payments to Aggregated Accounts will be based on the Qualified Customer's metered usage disregarding any contributions allocated from the Generating Account. Similarly, any other demand response programmatic elements that are affected by a customer's load (e.g., program eligibility) shall also exclude from consideration any impacts of Generator Account generation. Any payments for demand response will be limited to the customer's load, and not include excess generation exported to the grid.

**TERRITORY:** The entire territory served.

**RATES:** All rates charged under this schedule will be in accordance with the eligible customer-generator's PG&E otherwise-applicable metered rate schedule (OAS). An eligible customer-generator served under this schedule is responsible for all charges from its OAS including monthly minimum charges, customer charges, meter charges, facilities charges, demand charges and surcharges. The "Average Rate Limiter" for general service OAS's and all other demand charges will be based on the demand in kilowatts as measured only on the energy being consumed by the customer from PG&E. The power factor, when it applies on the OAS, will be based on the energy consumed by the customer-generator from PG&E and the average power factor over the past 12 billing months of operation prior to starting on NEM. Customer-generators without 12 billing months of power factor history, will have their power factor estimated based on the nature of the connected facilities and their hours of operation. Power factor will be subsequently applied to the customer-generator's bill until the customer-generator demonstrates to PG&E's satisfaction that adequate correction had been provided. PG&E will continue to monitor and review the power factor and if warranted, change the power factor correction on the customer-generator's bills. Charges for energy (kWh) supplied by PG&E, ESP or Community Choice Aggregator (CCA), as applicable, will be based on the net metered usage in accordance with Billing (Special Condition 2, below).

For PG&E customer-generators, the energy charges will be in accordance with the customer-generator's OAS. For ESP or CCA customer-generators, the ESP or CCA is responsible for providing the billing information regarding the applicable generation-related bill charges or credits to PG&E on a timely basis.

Customer-generators eligible for service under this schedule are exempt from the requirements of Schedule S—Standby Service except Multiple Tariff Facilities interconnected under the terms of Special Condition 4, may be subject to the requirements of Schedule S.

The charges and credits for Multiple Tariff Facilities taking service on this rate schedule under the provisions of Special Condition 4, will be calculated using the applicable OAS identified by the customer-generator in its application for interconnection and its interconnection agreement with PG&E or as subsequently changed by the customer-generator in accordance with PG&E's electric Rule 12.

Existing customer-generators being billed under sub-schedules NEMS, NEMEXP, NEMEXPM, or NEMA who only add storage and are eligible to use the estimation methodology described in Special Condition 11 ("NEM Paired Storage") will be billed using the estimation methodology as of their scheduled True-Up, provided that a True-Up is not required for any other reason. All other customer-generators with Multiple Tariff or NEM Paired Storage Facilities with existing NEM, NEMBIO and/or NEMFC eligible generators interconnecting additional generators or storage, will receive a bill true-up prior to taking service under Special Condition 4. This ensures that all NEM accounts have the same Relevant Period, as defined in Special Condition 2, going forward. (N) I (N) (T) (T) (T)

(Continued)



**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 5

RATES:  
(Cont'd.)

Customer-generators eligible for service under this schedule are exempt from the requirements of Schedule S—Standby Service except Multiple Tariff Facilities interconnected under the terms of Special Condition 4, may be subject to the requirements of Schedule S.

The charges and credits for Multiple Tariff Facilities taking service on this rate schedule under the provisions of Special Condition 4, will be calculated using the applicable OAS identified by the customer-generator in its application for interconnection and its interconnection agreement with PG&E or as subsequently changed by the customer-generator in accordance with PG&E's electric Rule 12.

Existing customer-generators being billed under sub-schedules NEM2S, NEM2EXP, NEM2EXPM, or NEM2A who only add storage and are eligible to use the estimation methodology described in Special Condition 9 ("NEM Paired Storage") will be billed using the estimation methodology as of their scheduled True-Up, provided that a True-Up is not required for any other reason. All other customer-generators with Multiple Tariff Facilities or NEM Paired Storage with existing NEM2 eligible generators or storage interconnecting additional generators, will receive a bill true-up prior to taking service under Special Condition 4. This ensures that all NEM2 accounts have the same Relevant Period, as defined in Special Condition 2, going forward.

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Residential Customers on this tariff, who are required to take TOU rates prior to the implementation of default TOU rates for all residential customers, and who are on any TOU rate (including a TOU pilot rate) prior to the implementation of default residential TOU rates, have the option to stay on that TOU rate for a period of five years from the date the customer commences the TOU rate.

PG&E rates and rate design, including the rates and rate design reflected in this Tariff, are subject to change from time to time. Customers should take this into consideration when making any long term decisions based on rate structures that are currently in place.

(Continued)



**ELECTRIC TABLE OF CONTENTS**

Sheet 1

**TABLE OF CONTENTS**

<b>SCHEDULE</b>	<b>TITLE OF SHEET</b>	<b>CAL P.U.C. SHEET NO.</b>	
Title Page.....		<b>44461-E</b>	(T)
Rate Schedules.....	44171,44172,44173,44174, <b>44462</b> ,44176,41779,43935,44177-E		(T)
Preliminary Statements.....	44178,40534,42856*,43670,41723,40591,44452-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 5559-E  
Decision

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted  
Effective  
Resolution

June 14, 2019



ELECTRIC TABLE OF CONTENTS

Sheet 6

Table with columns: SCHEDULE, TITLE OF SHEET, and CAL P.U.C. SHEET NO. Includes entries for Standby Service, Bioenergy Market Adjusting Tariff, Combined Heat and Power PPA, etc.

(Continued)

Advice 5559-E  
June 14, 2019

## **Attachment 2**

### **Redline Tariffs**



**ELECTRIC SCHEDULE NEM  
NET ENERGY METERING SERVICE**

Sheet 5

**APPLICABILITY: Demand Response Programs -**

(Cont'd.)

For Load Aggregation pursuant to Special Condition 7, Aggregated Accounts, including the Generating Account, are eligible for the same demand response programs and solar tariffs as NEM customers. Demand response payments to Aggregated Accounts will be based on the Qualified Customer's metered usage disregarding any contributions allocated from the Generating Account. Similarly, any other demand response programmatic elements that are affected by a customer's load (e.g., program eligibility) shall also exclude from consideration any impacts of Generator Account generation. Any payments for demand response will be limited to the customer's load, and not include excess generation exported to the grid.

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**TERRITORY:** The entire territory served.

**RATES:** All rates charged under this schedule will be in accordance with the eligible customer-generator's PG&E otherwise-applicable metered rate schedule (OAS). An eligible customer-generator served under this schedule is responsible for all charges from its OAS including monthly minimum charges, customer charges, meter charges, facilities charges, demand charges and surcharges. The "Average Rate Limiter" for general service OAS's and all other demand charges will be based on the demand in kilowatts as measured only on the energy being consumed by the customer from PG&E. The power factor, when it applies on the OAS, will be based on the energy consumed by the customer-generator from PG&E and the average power factor over the past 12 billing months of operation prior to starting on NEM. Customer-generators without 12 billing months of power factor history, will have their power factor estimated based on the nature of the connected facilities and their hours of operation. Power factor will be subsequently applied to the customer-generator's bill until the customer-generator demonstrates to PG&E's satisfaction that adequate correction had been provided. PG&E will continue to monitor and review the power factor and if warranted, change the power factor correction on the customer-generator's bills. Charges for energy (kWh) supplied by PG&E, ESP or Community Choice Aggregator (CCA), as applicable, will be based on the net metered usage in accordance with Billing (Special Condition 2, below).

For PG&E customer-generators, the energy charges will be in accordance with the customer-generator's OAS. For ESP or CCA customer-generators, the ESP or CCA is responsible for providing the billing information regarding the applicable generation-related bill charges or credits to PG&E on a timely basis.

Customer-generators eligible for service under this schedule are exempt from the requirements of Schedule S—Standby Service except Multiple Tariff Facilities interconnected under the terms of Special Condition 4, may be subject to the requirements of Schedule S.

The charges and credits for Multiple Tariff Facilities taking service on this rate schedule under the provisions of Special Condition 4, will be calculated using the applicable OAS identified by the customer-generator in its application for interconnection and its interconnection agreement with PG&E or as subsequently changed by the customer-generator in accordance with PG&E's electric Rule 12.

Existing customer-generators being billed under sub-schedules NEMS, NEMEXP, NEMEXPM, or NEMA who only add storage and are eligible to use the estimation methodology described in Special Condition 11 ("NEM Paired Storage") will be billed using the estimation methodology as of their scheduled True-Up, provided that a True-Up is not required for any other reason. All other Customer-generator customer-generators with Multiple Tariff or NEM Paired Storage Facilities with existing NEM, NEMBIO and/or NEMFC eligible generators interconnecting additional generators or storage, will receive a bill true-up prior to taking service under Special Condition 4. This ensures that all NEM accounts have the same Relevant Period, as defined in Special Condition 2, going forward.

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(Continued)

Advice 4418-E  
Decision 14-03-041

Issued by  
**Brian K. Cherry**  
Vice President  
Regulatory Relations

Date Filed May 19, 2014  
Effective June 18, 2014  
Resolution



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