

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 6, 2019

**Advice Letter 5586-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: Revision to Electric Preliminary Statement Part HM for Recovery of Costs  
Associated with the Behind-the-Meter Thermal Storage Program in  
Compliance with Assembly Bill 2868.**

Dear Mr. Jacobson:

Advice Letter 5586-E is effective as of August 2, 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

July 12, 2019

**Advice 5586-E**

(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

**Subject: Revision to Electric Preliminary Statement Part HM for Recovery of Costs Associated with the Behind-the-Meter Thermal Storage Program in Compliance with Assembly Bill 2868**

**Purpose**

As authorized by Ordering Paragraph (OP) 5 of Decision (D.) 19-06-032, Pacific Gas and Electric Company (PG&E) submits this Tier 1 advice letter to update Electric Preliminary Statement Part HM – *Public Policy Charge Balancing Account (PPCBA)*, to add a new subaccount to record actual costs and revenues in connection with the customer-connected Behind-the-Meter (BTM) Thermal Storage Program as filed in Application (A.) 18-03-001.<sup>1</sup> The affected tariff sheets are included in this advice letter as Attachment 1.

**Background**

In response to Assembly Bill (AB) 2868, the California Public Utilities Commission (Commission or CPUC) included in its *Decision on Track 2 Energy Storage Issues* (D.17-04-039) direction for the three investor-owned utilities to file applications for programs and investments to accelerate widespread deployment of distributed energy storage systems to achieve ratepayer benefits, reduce dependence on petroleum, meet air quality standards, and reduce emissions of greenhouse gases. D.17-04-039 stated that the programs and investments proposed by the IOUs must seek to minimize overall costs and maximize overall benefits, and prioritize distributed energy storage systems to public sector and low-income customers.

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<sup>1</sup> A.18-03-001 requested to establish a new Public Policy Balancing Account, which had not yet been established at the time of filing on March 1, 2018. On August 6, 2018, Advice Letter 5351-E was submitted requesting to establish a Public Policy Balancing Account and subsequently named the account the Public Policy Charge Balancing Account. While A.18-03-001 was still pending approval, Advice Letter 5351-E was approved by Disposition Letter on January 24, 2019, making the Public Policy Charge Balancing Account effective as of September 6, 2018.

On March 1, 2018, PG&E filed Application (A.) 18-03-001, which, among other things, proposed a BTM thermal storage program with a goal to reduce peak load by up to 5 megawatts (MW) by 2025 using smart electric water heaters and/or smart control devices. This program encourages participants to reduce or eliminate hot water heater load during peak evening hours, effectively storing energy and using it to provide hot water when there is increased congestion on the grid. PG&E requested Commission authority to spend up to \$6.4 million in connection with the BTM program during the period from 2019 to 2025.

In A.18-03-001, PG&E proposed to establish a Public Policy Balancing Account to record actual costs and revenues for the customer-connected BTM Thermal Storage Program with recovery through the Public Purpose Program rate. Total costs recorded to the Public Policy Balancing Account for the BTM Thermal Storage Program will not exceed the authorized expenditure.

On June 27, 2019, the Commission adopted D.19-06-032, which, among other things, approved PG&E's BTM Thermal Storage Program and its requested cost recovery. As a result, PG&E is modifying Electric Preliminary Statement Part HM by adding a new subaccount to record actual costs and revenues with recovery through the Public Purpose Program rate.

### **Tariff Revisions**

Electric Preliminary Statement Part HM – *Public Policy Charge Balancing Account (PPCBA)*: Add accounting procedure 5.D.d. to record costs incurred from the BTM Thermal Storage Program.

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than August 1, 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, 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.

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 1 advice letter become effective upon date of submittal, which is July 12, 2019.

### **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 A.18-03-001. 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/>.

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/S/

Erik Jacobson  
Director, Regulatory Relations

Attachments

cc: Service List A.18-03-001



# 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) #: 5586-E

Tier Designation: 1

Subject of AL: Revision to Electric Preliminary Statement Part HM for Recovery of Costs Associated with the Behind-the-Meter Thermal Storage Program in Compliance with Assembly Bill 2868

Keywords (choose from CPUC listing): Compliance,

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted 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: 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: 7/12/19

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 Preliminary Statement Part HM

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.
44715-E	ELECTRIC PRELIMINARY STATEMENT PART HM PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA) Sheet 1	44051-E
44716-E	ELECTRIC PRELIMINARY STATEMENT PART HM PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA) Sheet 3	44052-E
44717-E	ELECTRIC PRELIMINARY STATEMENT PART HM PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA) Sheet 4	
44718-E	ELECTRIC TABLE OF CONTENTS Sheet 1	44679-E
44719-E	ELECTRIC TABLE OF CONTENTS Sheet 17	44694-E



**ELECTRIC PRELIMINARY STATEMENT PART HM**  
**PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA)**

Sheet 1

HM. Public Policy Charge Balancing Account (PPCBA)

1. **PURPOSE:** The purpose of the Public Policy Charge Balancing Account (PPCBA) is to track revenues and actual costs incurred to implement adopted programs that may be funded through public policy funds.
2. **APPLICABILITY:** The subaccounts will apply to all bundled customer electric rate schedules, except for those schedules or contracts specifically excluded by the Commission.
3. **REVISION DATES:** The disposition of the balances in the respective subaccounts will be determined through the advice letter process or an Application.
4. **RATES:** The rate applicable to PPCBA is set forth in Electric Preliminary Statement Part I.
5. **ACCOUNTING PROCEDURE:** The following entries will be made each month, as applicable, excluding amounts for Revenue Fees and Uncollectible.

The PPCBA has four subaccounts:

**Disadvantaged Communities Green Tariff (DAC-GT) Subaccount** is a two-way balancing account that tracks the annual funding of the program through greenhouse gas (GHG) and public policy revenues compared to costs incurred to implement, operate, maintain, and administer the program.

**Community Solar Green Tariff (CS-GT) Subaccount** is a two-way balancing account that tracks the annual funding of the program through GHG and public policy revenues compared to costs incurred to implement, operate, maintain, and administer the program.

**Disadvantaged Communities Single-Family Solar Homes (DAC-SASH) Subaccount** is a balancing account that tracks the authorized funding through Greenhouse Gas (GHG) and public policy revenue against the remittance to Program Administrator to cover the cost of the program.

**Public Policy Charge Programs Subaccount** is a two-way balancing account that tracks the adopted revenue requirement for (1) San Joaquin Valley Disadvantaged Communities Data Gathering Plan where the program costs are tracked in San Joaquin Valley Disadvantaged Communities Data Gathering Plan Memorandum Account (SJVDAC DGPMA), (2) Net Energy Metering measurement and evaluation costs where the program costs are tracked in Net Energy Metering Balancing Account (NEMBA), and (3) San Joaquin Valley Disadvantaged Communities Pilot costs which are tracked in San Joaquin Valley Disadvantaged Communities Pilot Balancing Account (SJVDAC PBA); and (4). the program costs for the Behind-the-Meter (BTM) Thermal Storage Program.

(N)  
(N)

**A. DAC-GT Subaccount**

- a. An annual credit entry equal to Greenhouse gas (GHG) revenues authorized to be transferred from the Greenhouse Gas Revenue Balancing Account (GHGRBA).
- b. A credit entry equal to public policy revenues associated with this program.

(Continued)

<i>Advice</i>	5586-E	<i>Issued by</i>	<i>Submitted</i>	July 12, 2019
<i>Decision</i>	19-06-032	<b>Robert S. Kenney</b>	<i>Effective</i>	July 12, 2019
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	



**ELECTRIC PRELIMINARY STATEMENT PART HM**  
**PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA)**

Sheet 3

HM. Public Policy Charge Balancing Account (PPCBA) (Cont'd)

5. ACCOUNTING PROCEDURE (Cont'd):

**B. CS-GT Subaccount** (Cont'd):

- d. A debit entry equal to the Marketing expense that may include labor and labor overhead, material, and contract costs.
- e. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

**C. DAC-SASH Subaccount**

- a. An annual credit entry equal to GHG revenue authorized to be transferred from the Greenhouse Gas Revenue Balancing Account (GHGRBA).
- b. A credit entry equal to public policy revenues associated with this program.
- c. A debit entry to record the remittance to Program Administrator to cover costs associated with the program.
- d. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the CPUC.
- e. A entry equal to interest on the average balance in the account at the beginning of the month and the ending balance after the above entries, at a rate equal to one-twelfth of the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

**D. Public Policy Charge Programs Subaccount**

- a. A debit entry, as appropriate, to record the transfer of amounts from the SJVDAC DGPMA as approved by the CPUC to record the adopted cost recovery.
- b. A debit entry, as appropriate, to record the transfer of amounts from the NEMBA as approved by the CPUC to record the adopted cost recovery.
- c. A debit entry equal to one-twelfth of the annual authorized revenue requirement (including Revenue Fees and Uncollectible (RF&U) accounts expense) for the San Joaquin Valley Disadvantaged Communities Pilot Projects.
- d. A debit entry equal to the program costs for the BTM Thermal Storage Program that shall not exceed the authorized budget. (N)  
(N)
- e. A credit entry equal to public policy revenues associated to recover the adopted cost with the programs tracked in this subaccount. (L)  
(L)

(Continued)

<i>Advice</i>	5586-E	<i>Issued by</i>	<i>Submitted</i>	July 12, 2019
<i>Decision</i>	19-06-032	<b>Robert S. Kenney</b>	<i>Effective</i>	July 12, 2019
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	



**ELECTRIC PRELIMINARY STATEMENT PART HM**  
**PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA)**

Sheet 4

HM. Public Policy Charge Balancing Account (PPCBA) (Cont'd)

(L)

5. ACCOUNTING PROCEDURE (Cont'd):

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**D. Public Policy Charge Programs Subaccount (Cont'd)**

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

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Part GO	Disconnection Memorandum Account - Electric (DMA-E).....	34604-E
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(Continued)

Advice 5586-E  
July 12, 2019

## **Attachment 2**

### **Redline Tariffs**

**ELECTRIC PRELIMINARY STATEMENT PART HM** Sheet 1  
**PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA)**

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**Community Solar Green Tariff (CS-GT) Subaccount** is a two-way balancing account that tracks the annual funding of the program through GHG and public policy revenues compared to costs incurred to implement, operate, maintain, and administer the program.

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**Public Policy Charge Programs Subaccount** is a two-way balancing account that tracks the adopted revenue requirement for (1) San Joaquin Valley Disadvantaged Communities Data Gathering Plan where the program costs are tracked in San Joaquin Valley Disadvantaged Communities Data Gathering Plan Memorandum Account (SJVDAC DGPMA), (2) Net Energy Metering measurement and evaluation costs where the program costs are tracked in Net Energy Metering Balancing Account (NEMBA), and (3) San Joaquin Valley Disadvantaged Communities Pilot costs which are tracked in San Joaquin Valley Disadvantaged Communities Pilot Balancing Account (SJVDAC PBA); and (4)- the program costs for the Behind-the-Meter (BTM) Thermal Storage Program.

**A. DAC-GT Subaccount**

- a. An annual credit entry equal to Greenhouse gas (GHG) revenues authorized to be transferred from the Greenhouse Gas Revenue Balancing Account (GHGRBA).
- b. A credit entry equal to public policy revenues associated with this program.

(Continued)

<i>Advice</i>	5471-E-A		
<i>Decision</i>	18-12-015	<i>Issued by</i>	<i>Submitted</i>
		<b>Robert S. Kenney</b>	April 19, 2019
		<i>Vice President, Regulatory Affairs</i>	<i>Effective</i>
			April 19, 2019
			<i>Resolution</i>

**ELECTRIC PRELIMINARY STATEMENT PART HM**  
**PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA)**

Sheet 3

HM. Public Policy Charge Balancing Account (PPCBA) (Cont'd)

5. ACCOUNTING PROCEDURE (Cont'd):

**B. CS-GT Subaccount** (Cont'd):

- d. A debit entry equal to the Marketing expense that may include labor and labor overhead, material, and contract costs.
- e. An entry equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

**C. DAC-SASH Subaccount**

- a. An annual credit entry equal to GHG revenue authorized to be transferred from the Greenhouse Gas Revenue Balancing Account (GHGRBA).
- b. A credit entry equal to public policy revenues associated with this program.
- c. A debit entry to record the remittance to Program Administrator to cover costs associated with the program.
- d. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the CPUC.
- e. A entry equal to interest on the average balance in the account at the beginning of the month and the ending balance after the above entries, at a rate equal to one-twelfth of the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

**D. Public Policy Charge Programs Subaccount**

- a. A debit entry, as appropriate, to record the transfer of amounts from the SJVDAC DGPMA as approved by the CPUC to record the adopted cost recovery.
- b. A debit entry, as appropriate, to record the transfer of amounts from the NEMBA as approved by the CPUC to record the adopted cost recovery.
- c. A debit entry equal to one-twelfth of the annual authorized revenue requirement (including Revenue Fees and Uncollectible (RF&U) accounts expense) for the San Joaquin Valley Disadvantaged Communities Pilot Projects.
- d. A debit entry equal to the program costs for the BTM Thermal Storage Program that shall not exceed the authorized budget.
- ~~d.e.~~ A credit entry equal to public policy revenues associated to recover the adopted cost with the programs tracked in this subaccount.

(Continued)

<i>Advice</i>	5471-E-A		
<i>Decision</i>	18-12-015	<i>Issued by</i> <b>Robert S. Kenney</b> <i>Vice President, Regulatory Affairs</i>	<i>Submitted</i> <hr/> April 19, 2019 <i>Effective</i> <hr/> April 19, 2019 <i>Resolution</i> <hr/>

**ELECTRIC PRELIMINARY STATEMENT PART HM**  
**PUBLIC POLICY CHARGE BALANCING ACCOUNT (PPCBA)**

Sheet 3

e.f. A debit or credit entry equal to interest on the average balance in the account at the beginning of the month and the ending balance after the above entries, at a rate equal to one-twelfth of the interest rate on the three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

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<i>Advice</i>	5471-E-A	<i>Issued by</i>	<i>Submitted</i>	April 19, 2019
<i>Decision</i>	18-12-015	<b>Robert S. Kenney</b>	<i>Effective</i>	April 19, 2019
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	

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**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
City of Palo Alto	Marin Energy Authority	Tiger Natural Gas, Inc.
	McKenzie & Associates	
City of San Jose	Modesto Irrigation District	TransCanada
Clean Power Research	Morgan Stanley	Troutman Sanders LLP
Coast Economic Consulting	NLine Energy, Inc.	Utility Cost Management
Commercial Energy	NRG Solar	Utility Power Solutions
County of Tehama - Department of Public Works		Utility Specialists
Crossborder Energy	Office of Ratepayer Advocates	
Crown Road Energy, LLC	OnGrid Solar	Verizon
Davis Wright Tremaine LLP	Pacific Gas and Electric Company	Water and Energy Consulting Wellhead Electric Company
Day Carter Murphy	Peninsula Clean Energy	Western Manufactured Housing Communities Association (WMA)
		Yep Energy
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		