

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 16, 2019

Advice Letter 5605-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: Update to Community Choice Aggregate and Energy Service Provider Load Data and Utility Investment and Procurement Information.

Dear Mr. Jacobson:

Advice Letter 5605-E is effective as of August 1, 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

August 1, 2019

ADVICE 4048-E
(Southern California Edison Company U 338-E)

ADVICE 5605-E
(Pacific Gas and Electric Company U 39-E)

ADVICE 3408-E
(San Diego Gas & Electric Company U 902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Update to Community Choice Aggregate and Energy Service
Provider Load Data and Utility Investment and Procurement
Information

PURPOSE

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

BACKGROUND

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

¹ D.13-10-040, Appendix A, p.1.

² *Id.*

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

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

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

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

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

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

Commission Resolution E-4892 addressing Advice 5119-E et al. directed the IOUs to submit a supplemental advice letter to make corrections to Tables 4 through 6.

On January 16, 2018, the Joint Utilities submitted Advice 3640-E-A et. al to make these corrections. On February 5, 2018, AReM/DACC submitted a timely protest on the Joint

³ *Id.* at 46.

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

⁵ D.17-04-039, p. 22-23.

⁶ *Id.* at 27.

Utilities' Advice 3640-E-A et. al.⁷ AReM/DACC contended that the Joint Utilities did not calculate the automatic limiter and adjusted energy storage procurement obligations of the ESPs correctly and argued that the Joint Utilities should have combined the ESP obligation across IOUs.⁸

On February 12, 2018, the Joint Utilities submitted a timely reply.⁹ The Joint Utilities responded that D.17-04-039 did not adopt a new statewide target and it did not allow ESPs and CCAs in one IOU's service territory to benefit from the allocation of procurement in another IOU's service territory. Each ESP and CCA is bound by the one percent procurement target, and the procurement target is only reduced if that LSE's own procurement plus its customers' share of nonbypassable charges exceeds the host utility's obligation as a percentage of load.¹⁰

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

On August 1, 2018, the Joint Utilities submitted Advice 3833-E et. al., to update Tables 3 through 6.

On August 21, 2018, AReM/DACC and Marin Clean Energy (MCE) submitted comments to the joint advice letter. AReM/DACC's comments agreed with the IOU's calculations. MCE's comments stated that there was a slight miscalculation of CCA load data in PG&E's service territory and recommended that PG&E be required to adjust its calculation of CCA load share from 209 MW to 207 MW. MCE also stated in its comments that SDG&E's calculation of CCA share should be adjusted to take into account the storage costs recovered through non-bypassable charges for SDG&E and reflect that the automatic limiter had been triggered.¹²

On August 28, PG&E timely submitted a reply to the MCE comments. In its comments, PG&E maintained that the 209 MW of CCA load share in its territory is accurate.

On December 5, 2018, the CPUC issued a disposition letter approving the Joint IOUs' advice letters in their entirety. The Energy Division found the IOUs' calculations to be reasonable and did not require any further action from the IOUs. The Energy Division

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

⁸ *Id.* at 2-3.

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

¹⁰ *Id.* at 2.

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

¹² CPUC Staff Disposition Letter, December 5, 2018, p. 2.

noted that the automatic limiter had been triggered for ESPs and CCAs in the service territories of all three IOUs and the 1% storage procurement obligation was eliminated.

Updated Tables

Table 3: ENERGY STORAGE COST RECOVERY (Data as of July 2019)

SERVICE TERRITORY	PG&E	SCE	SDG&E
Storage MW recovered or approved for recovery via non-bypassable charges (to date) ¹³	49.818 ¹⁴	396.07 ¹⁵	164.12 ¹⁶
Future (known additional) MW expected to be recovered via non-bypassable charges ¹⁷	587.5 ¹⁸	195 ¹⁹	0
Total MW expected to be recovered via non-bypassable charges	637.318	591.07	164.12

¹³ This information reflects Cost Allocation Mechanism (CAM) and distribution charge recovery, and only those contracts that have been approved for recovery to date.

¹⁴ 6 MW via distribution charge + 43.32 MW of customer-sited SGIP/PLS projects (Distribution Charge. D.13-10-040 (CPUC June 2019 Update)) + 0.5 MW for Browns Valley (A.16-03-001; D.16-09-007).

¹⁵ 13.92 MW via distribution charge + 60.31 MW of SGIP/PLS July 2019 update (does not account for DA / CCA counting rule application for SGIP as per D.16-01-032) + 22 MW of Aliso Canyon Energy Storage (ACES) projects (Resolution E-4804 - 5 MW of original 27 MW authorization was cancelled) + 254.84 MW in West LA Basin via SCE 2013 LCR RFO to replace SONGS capacity (D.15-11-041) + 20 ACES Design Build Transfer (Resolution E-4791) + ACES Enhanced Gas Turbines (A.17-03-020) + 5 MW from SCE's PRP RFO 2 (A.16-11-002).

¹⁶ 6.15 MW via distribution rates + 36.97 MW of SGIP/PLS + 37.5 MW of ACES storage projects (Resolution E-4798) + 83.5 MW Track IV LCR (D.18-05-24).

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

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

¹⁹ 100 MW via 2018 LCR RFP (A.19-04-016) + 95 MW via ACES 2 RFO (SCE AL 4002-E).

Table 4: DIRECT ACCESS STORAGE PROCUREMENT COST OBLIGATIONS (Data as of July 2019)

SERVICE TERRITORY	PG&E	SCE	SDG&E
Applicable ESP load (GWh) ²⁰	9,520	11,710	3,459
DA MW share of non-bypassable charges ²¹	96	89	25
1% ESP procurement obligation (GWh)	95	117	35
1% ESP procurement obligation (MW) ²²	17	21	6

Table 5: COMMUNITY CHOICE AGGREGATORS STORAGE PROCUREMENT COST OBLIGATIONS (Data as of July 2019)

SERVICE TERRITORY	PG&E	SCE	SDG&E
Applicable CCA load (GWh) ²³	36,316 ²⁴	19,090 ²⁵	64 ²⁶
CCA MW share of non-bypassable charges ²⁷	282	137	0.6
1% CCA procurement obligation (GWh)	363	191	0.6
1% CCA procurement obligation (MW)	65	34	0.1

²⁰ 2020 Direct Access load forecast data available at: 2018 IEPR Load Forecast <https://efiling.energy.ca.gov/GetDocument.aspx?tn=222582>. 2018 IEPR Corrected LSE and BA Tables Mid Baseline – Mid AAEE Form 1.1c.

²¹ Direct Access (DA) ESPs are responsible for non-bypassable charges based on load share for CAM and distribution rates. This does not include PCIA for storage. ESPs comprise 15.1 percent of load share, based on the latest Direct Access Implementation Activities Report, published April 15, 2019, accessible at: <http://www.cpuc.ca.gov/General.aspx?id=6598>.

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

²³ 2020 CCA load forecast data available at: 2018 IEPR Load Forecast. <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?doctetnumber=17-IEPR-03>. Revised LSE and BA Tables Mid Baseline – Mid AAEE. Form 1.1(c).

²⁴ 2020 CCA load forecast data available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=222582>. 2018 IEPR Corrected LSE and BA Tables Mid Baseline – Mid AAEE Form 1.1c.

²⁵ 2020 CCA load forecast, less publicly available data for CPA Phases 1 to 4, plus data from implementation plans of Baldwin Park, City of Commerce, CPA phases 1 to 5, DCE, Hanford, Palmdale, Pomona, and WCE.

²⁶ 2020 CCA load forecast data available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=226462&DocumentContentId=57239> Corrected LSE and BA Tables Mid Baseline Low AAEE AAPV Form 1.1c.

²⁷ Currently active CCAs comprise 44.2 percent of forecasted 2020 load in PG&E territory; 23.2% of forecasted 2020 load in SCE territory; 0.35% of forecasted 2020 load in SDG&E territory. Percentages are derived from 2018 IEPR Load Forecast. Available at <https://efiling.energy.ca.gov/GetDocument.aspx?tn=222582>. 2018 IEPR Corrected LSE and BA Tables Mid Baseline – Mid AAEE Form 1.1c.

Table 6: COMPARISON OF UTILITY, DIRECT ACCESS, AND COMMUNITY CHOICE AGGREGATORS STORAGE PROCUREMENT COST OBLIGATIONS (Data as of July 2019)

SERVICE TERRITORY	PG&E		SCE		SDG&E	
	Storage obligation as % of total 2020 load forecast- Storage Target of 1325 MW	580 MW ~ 3.2% ²⁸		580 MW ~2.7% ²⁹		165 MW ~4.1% ³⁰
Storage obligations as % total of 2020 load forecast – Storage Target of 1825 MW ³¹	746 MW ~ 4.1%		746 MW ~3.5%		331 MW ~8.3%	
Automatic Limiter Adjustment	Unadjusted	Adjusted	Unadjusted ³²	Adjusted ³³	Unadjusted ³⁴	Adjusted ³⁵
ESP Current Share: 1% procurement obligation + non-bypassable charge (MW / % of load)	113 MW ~ 6.7 %	54 MW ~3.2%	110 MW ~5.3%	56MW ~2.7%	31 MW ~5.0%	25 MW ~4.1%
CCA Current Share: 1% procurement obligation + non-bypassable charge (MW / % of load)	347 MW ~ 5.3 %	208 MW ~3.2%	171 MW ~5.0%	95 MW ~2.7 %	0.69 MW ~6.0%	0.47 MW ~4.1%

²⁸ PG&E Load derived from 2018 IEPR Load Forecast, Revised LSE and BA Tables Mid Baseline – Mid AAEE. Form 1.5(b). PG&E Service Area Greater Bay Area + PG&E Service Area Non Bay Area + PG&E Service Area ZP26.

²⁹ SCE Load Updated – 21,403 MW. Source: IEPR LSE and BA Tables Mid Baseline Mid AAEE Form 1.5b SCE TAC less, CDWR and Pasadena, less the sum of new 2020 CCA MW based on publicly available implementation plans (note: total does not include CPA phase 5 or WCE as the information was not provided in the plans)

³⁰ SDG&E Load Updated – 4,010 MW. Source: 2018 IEPR LSE and BA Tables Mid Baseline Mid AAEE Form 1.5b = SDG&E Service Area.

³¹ Includes procurement under AB 2868.

³² ESP / CCA Current Share, without application of Automatic Limiter.

³³ ESP / CCA Current Share, with application of Automatic Limiter.

³⁴ ESP / CCA Current Share, without application of Automatic Limiter.

³⁵ ESP / CCA Current Share, with application of Automatic Limiter.

EXPLANATION OF UPDATES

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

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

Table 5 has been updated to reflect the most recent, publicly available CCA and ESP load data, as of the date of this advice letter.

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

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

For SCE, because the ESP and CCA procurement obligations exceed SCE's storage obligation as a percentage of load of SCE (*i.e.*, greater than 2.7% - relative to Storage Target of 580 MW), the automatic limiter has been triggered for SCE for the ESP and CCA current shares. As such, SCE has applied the automatic limiter to the ESP and CCA shares in Table 6. SCE shows both the unadjusted MW / % (*i.e.*, before application of limiter), and adjusted (*i.e.*, after application of limiter) values for comparison purposes.

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

No cost information is required for this advice 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

This advice letter is subject to Energy Division disposition and is classified as Tier 1 (effective pending disposition) pursuant to GO 96-B, Energy Industry Rule 5.1 and OP 9.

EFFECTIVE DATE

SCE respectfully requests that this advice letter become effective on August 1, 2019, which is the date of this advice letter.

NOTICE

Anyone wishing to provide a response to this advice letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice letter. Responses 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, responses and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

For SCE

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
Managing Director, State Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

For SDG&E

Attn: Megan Caulson
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8330 Century Park Ct., CP31F
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For PG&E

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
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77 Beale Street, Mail Code B13U
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E-mail: PGETariffs@pge.com

There are no restrictions on who may submit a response, but the response 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.15-03-011 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com, SDG&ETariffs@semprautilities.com, PGETariffs@pge.com, or at (626) 302-3719. 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>. To view other SDG&E advice letters submitted with the Commission, visit SDG&E's web

site at <http://www.sdge.com/rates-regulations/tariff-information/advice-letters>. To view other PG&E advice letters submitted with the Commission, visit PG&E's web site at <http://www.pge.com/tariffs/>.

For questions directed at SCE, please contact David Balandran at (626) 302-6734 or by electronic mail at David.Balandran@sce.com. For questions directed at SDG&E, please contact Megan Caulson at (858) 654-1748 or by electronic mail at mcaulson@semprautilities.com. For questions directed at PG&E, please contact Kingsley Cheng at (415) 973-5265 or by electronic mail at K2c0@pge.com and PGETariffs@pge.com.

Southern California Edison Company

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

GAS:dmb:cm
Enclosures



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) #: 4048-E

Tier Designation: 1

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

Keywords (choose from CPUC listing): Compliance Procurement

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision 17-04-039

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

Summarize differences between the AL and the prior withdrawn or rejected 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: 8/1/19

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.
Title: Managing Director, State Regulatory Operations
Utility Name: Southern California Edison Company
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Name: Laura Genao c/o Karyn Gansecki
Title: Managing Director, State Regulatory Affairs
Utility Name: Southern California Edison Company
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State: California Zip: 94102
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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
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		