
PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 22, 2020

Advice Letter 5717-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: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013.

Dear Mr. Jacobson:

Advice Letter 5717-E is effective as of December 19, 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

December 19, 2019

Advice 5717-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013.

Purpose

In compliance with Decision (D.) 18-08-013, issued on August 17, 2018 in Pacific Gas and Electric Company's (PG&E) 2017 General Rate Case (GRC) Phase 2 Proceeding, PG&E submits this information-only Advice Letter (AL) to report on its progress to increase Family Electric Rate Assistance (FERA) program enrollment.¹

Background

The FERA program (also known as the Lower-Middle Income Large Household Program) provides rate assistance to large households of lower-to-middle-income customers.² The FERA program was designed to assist larger families that are ineligible for the California Alternate Rates for Energy Program (CARE) rate because their income level falls slightly above the CARE program income eligibility limit.

FERA is available for households of three or more individuals that have a total household income of between 200 percent plus \$1 and 250 percent of the Federal Poverty Level (FPL) guideline.³ The income threshold increases with each additional family member

¹ D.18-08-013, Ordering Paragraph 15, states, "PG&E shall report to Energy Division by the end of 2018, 2019, 2020, 2021, 2022, and 2023 on its progress to increase FERA subscription by filing information-only advice letters that are served on the service list of this proceeding."

² The Commission authorized the FERA program in D. 04-02-057.

³ D.05-10-044 increased the lower income limits of the FERA Program were raised to 200%+\$1 of the Federal Poverty Guideline levels.

over three people. Eligible FERA participants currently receive an 18 percent bill discount for their electric usage.⁴

In PG&E's GRC Phase II proceeding, the California Public Utilities Commission (CPUC or Commission) expressed concern that the FERA program is not highly customer subscribed.⁵ Noting that PG&E's CARE customer participation rate is much higher than its FERA participation rate, the Commission ruled:

It is appropriate and necessary for PG&E to significantly increase its rate of FERA participation. Ultimately, PG&E should achieve a similar subscription level for FERA as for CARE. At this time, we require PG&E to make significant efforts to increase its FERA subscription level over the next six years, with the aim of achieving a 50% subscription level.⁶

The GRC Phase II decision prescribed several actions for PG&E to increase FERA participation, including: focusing efforts in the Central Valley (CV), conducting one or more workshops in the CV, and submission of an updated advice letter to inform the Commission of PG&E's plan to use unspent CARE marketing funds to increase FERA enrollment.⁷ Included in these requirements is an order to submit an information-only advice letter to report on FERA participation progress. The advice letter is to be filed at the end of each year through 2023.⁸

Progress Report Toward Increasing FERA Enrollment

In compliance with D. 18-08-013, PG&E hereby reports on its progress toward increasing FERA enrollment from December 1, 2018 until November 30, 2019. FERA statistics for the month of December are not available at the time of submittal this advice letter.

⁴ In D.15-07-001, the Commission changed PG&E's FERA discount to a 12 percent effective discount as a single line-item on PG&E's bills. In 2018, Senate Bill (SB) 1135 amended Public Utilities Code Section 739.12 to increase the FERA discount to 18 percent effective January 1, 2019.

⁵ D.18-08-013, p. 74.

⁶ *Id.*, p. 75

⁷ *Id.* PG&E filed Advice Letter 3990-G-B/5329-E-B on October 8, 2018 to detail its marketing plans to increase FERA enrollment.

⁸ *Id.*, OP 15.

Table 1: FERA Program Enrollment from December 1, 2018 to November 30, 2019^(a)

Month/Year	FERA Estimated Eligible Customers	FERA Enrolled Customers	FERA Penetration Rate	Discount Provided to FERA- Enrolled Customers
December 2018	169,219	23,600	14%	\$391,204
January 2019	165,233	23,333	14%	\$534,158
February 2019	165,233	22,914	14%	\$515,537
March 2019	165,233	22,604	14%	\$551,170
April 2019	165,233	21,903	13%	\$453,153
May 2019	165,233	21,344	13%	\$472,622
June 2019	165,233	21,427	13%	\$558,383
July 2019	165,233	21,413	13%	\$711,533
August 2019	165,233	21,092	13%	\$801,067
September 2019	165,233	21,345	13%	\$728,950
October 2019	165,233	21,557	13%	\$553,320
November 2019	165,233	21,579	13%	\$411,814
Total	165,233	21,579	13%	\$6,291,707

(a) Final annual data for 2019 will be reported in the FERA Annual Report, to be filed on May 1, 2020.

2019 FERA Program Marketing and Outreach Summary

Based on the directives in D. 18-08-013, PG&E developed and submitted the FERA Marketing and Outreach (M&O) Plan via PG&E's AL 3990-G-B/5329-E-B on October 8, 2018. The M&O Plan detailed PG&E's proposals for using available and unspent marketing funds allocated to the CARE program to increase customer enrollment into the FERA program.

As outlined in the M&O Plan, new test campaigns and advertising materials to more prominently co-promote CARE and FERA were developed in Q1 2019. In Q2 2019, PG&E launched several key marketing initiatives including a multi-touch direct mail and email campaign, as well as a digital advertising campaign.

The FERA focused digital campaign, with paid search and Google-sponsored placements (also known as Gmail ads) launched in May, and display advertising launched in mid-June. The FERA digital campaign ran in parallel to the CARE media buy but with a distinct budget for tracking purposes. In addition to the territory-wide media buy, the 2019 media strategy included targeting of display

ads to zip codes with sufficient volume of estimated CARE and FERA-eligible population.⁹ Lower FERA enrollment penetration areas, such as the Central Valley, saw a higher volume of media placement as a result..

The FERA digital campaign continued through Q3 and into Q4. From the launch of the campaign in May, through October, the FERA digital media campaign generated 5,577 applications.¹⁰ The digital campaign drives both program awareness and enrollments for CARE and FERA. PG&E plans to continue these campaigns in 2020.

The first direct marketing campaign featuring more prominent FERA messaging launched in Q2 2019. Direct mail and email deployed in early June, with a second drop in late July. The campaign leveraged lessons learned over years of CARE direct marketing execution such as the campaign cadence and messaging tone. New CARE/FERA messaging and a new targeting approach were tested to target likely-eligible FERA customers. To generate targeted lists, PG&E used the CARE propensity model as a foundation,¹¹ then applied a data overlay of household income and household size to identify customers who appear more likely to be FERA-eligible. Customers identified through this method were placed in a FERA Newly-Eligible segment.

In addition to the customers identified as part of a FERA Newly-Eligible segment as described above, the campaign also targeted FERA Failed-to-Recertify, CARE Newly-Eligible, CARE Failed-to-Recertify and CARE Non-Responders.¹² Once the segments were identified, each segment list was randomized and split into two groups for testing. The goal of the test was to evaluate the effectiveness of co-promotion messaging. One group received the existing CARE-only message

⁹ Zip codes analysis identified 184 CARE zip codes with below average penetration rate. Of the 184 CARE zips, FERA has overlap with 155 of those zips. The 155 zip codes account for 62% of estimated FERA-eligible population. Zip codes selected for increased digital media spending have 250+ eligible households.

¹⁰ Analysis to evaluate how many of the digital applications submitted via the FERA media spend became FERA enrollments versus CARE enrollments will be conducted in 2020. Digital reporting for November was not yet available at the time of this report.

¹¹ PG&E leverages a propensity model to target eligible, non-enrolled income qualified customers. The CARE propensity model was developed in 2013, and further enhanced in 2016, and constructed using data collected from the PEV process, looking at variables that were deemed to be positive or negative indicators of a customer's qualification for CARE. The current model uses 21 variables to create an algorithm to score customers based on predicted CARE qualification. PG&E's residential customer database (CARE and non-CARE) is scored quarterly and grouped into ten deciles. The most likely eligible customers are those in the lower deciles.

¹² Newly-eligible customers have not received previous marketing campaigns. Failed-to-Recertify customers were those that were previously on CARE or FERA but did not recertify. Non-responders are customers who have received marketing communications in the past but did not enroll.

(“Control”) letter with a dual CARE/FERA application. The other group received the test CARE/FERA co-promotion (“Test”) message with the dual CARE/FERA application.

Overall, the Q2 direct marketing campaign drove a lift in FERA enrollments. With the launch of FERA targeted marketing campaigns in Q2, PG&E saw the monthly new enrollment volume average increase 29% for Q3 versus the monthly average during the first half of 2019. However, CARE enrollments via the campaigns continued to be significantly higher despite the addition of FERA specific messaging. The Q2 direct mail and email campaign delivered a total of 1,705 FERA enrollments and 22,058 CARE enrollments.

The message testing structure showed that for the CARE and FERA Newly-Eligible and CARE Non-Responder audience segments there is no significant difference in enrollment rate between the Test and Control message versions. The CARE and FERA enrollment rates for these segments were virtually the same for both message versions (see Table 1).

Table 1 – Creative Test Results for CARE and FERA Enrollments

Audience Segment	TEST CREATIVE - Audience Mailed						CONTROL CREATIVE - Audience Mailed					
	Creative Version	# Customers	CARE Enrollments		FERA Enrollments		Creative Version	# Customers	CARE Enrollments		FERA Enrollments	
			#	%	#	%			#	%	#	%
FERA Newly-Eligible	CARE/FERA Test	8,318	212	2.55%	21	0.25%	CARE-only Control	8,320	214	2.57%	23	0.28%
CARE Newly-Eligible	CARE/FERA Test	61,367	4,171	6.80%	200	0.33%	CARE-only Control	61,382	4,158	6.77%	215	0.35%
CARE Non-Responder	CARE/FERA Test	109,481	3,388	3.09%	217	0.20%	CARE-only Control	109,471	3,404	3.11%	201	0.18%
	Total	179,166	7,771	4.34%	438	0.24%	Total	179,173	7,776	4.34%	439	0.25%

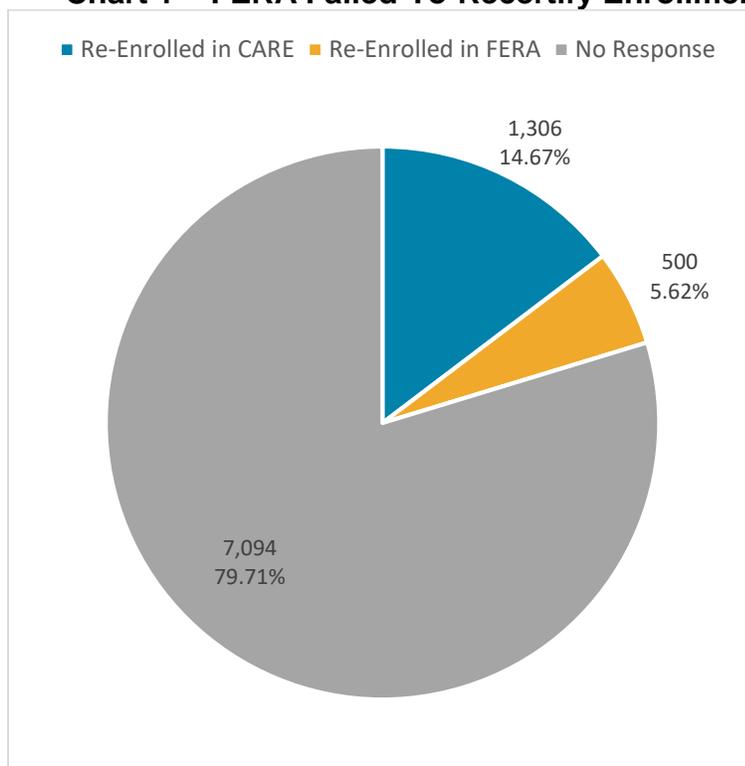
The Test also revealed that customers identified as FERA Newly-Eligible are enrolling in CARE at a significantly higher rate than FERA. However, review of the of the campaign results versus the “no-mail” holdout cells shows that the acquisition communications drive an overall increase in enrollments in both CARE and FERA (see Table 2).

Table 2 – Enrollment Rate Results versus No Mail Holdout Group

Audience Segment	TEST CREATIVE - AUDIENCE MAILED				CONTROL CREATIVE - AUDIENCE MAILED			NO MAIL - HOLDOUT	
	Creative Version	CARE Enrollments	FERA Enrollments	Creative Version	CARE Enrollments	FERA Enrollments	CARE Enrollments	FERA Enrollments	
		%	%		%	%	%	%	
FERA Newly-Eligible	CARE/FERA Test	2.55%	0.25%	Newly Eligible Control	2.57%	0.28%	0.51%	0.00%	
CARE Newly-Eligible	CARE/FERA Test	6.80%	0.33%	Newly Eligible Control	6.77%	0.35%	2.04%	0.05%	
CARE Non-Responder	CARE/FERA Test	3.09%	0.20%	Newly Eligible Control	3.11%	0.18%	0.63%	0.00%	

The results of testing within the Failed-to-Recertify (FTR) audience segments showed that FERA FTR customers are more responsive than CARE FTR, but most are re-enrolling in CARE rather than FERA. Although 20% of the FERA FTR audience responded to the Q2 campaign, 5% were re-enrolled in FERA versus fifteen percent that were re-enrolled in CARE. To better understand this shift in customer enrollment, PG&E plans to run a profile analysis of the FERA FTR audience in 2020 to examine: 1) those who became CARE customers, 2) those who remain FERA customers, and 3) those who do not respond to retargeting efforts (see Chart 1).

Chart 1 – FERA Failed-To-Recertify Enrollments



Message testing continued in Q4 via direct mail and email. The campaign deployed with drops in October and November targeting approximately 200,000 low income customers for CARE/FERA acquisition. PG&E again created lists with the five audience segments described in the approach for the Q2 campaign.

Because the FERA Newly-Eligible identified audience segment is small, PG&E split this segment into two groups and tested a new FERA-only message against the CARE/FERA co-promotion message that was launched in the Q2 campaign. The larger CARE Newly-Eligible and CARE Non-Responder segments were each split into three groups with one group receiving the FERA-only message, another group receiving the CARE/FERA message and the third receiving the CARE-only message. All message versions include the dual CARE/FERA application.

Results for this creative test will be analyzed in 2020 to determine the impact of a FERA-only message on FERA enrollment.

As part of the Q2 campaign launch, PG&E also completed updates to the existing CARE text response channel to incorporate FERA. Text can be offered as a response option for multiple tactics. For example, customers that receive acquisition email and open it on a mobile device will see the option to respond via text to apply. Depending on how the customer answers the questions in the text stream (i.e. number of people in the household and household income) they will be alerted to their qualification for CARE or FERA accordingly. Text channel analysis for CARE and FERA will be conducted in 2020.

In September, PG&E launched a new radio spot co-promoting CARE and FERA. The radio campaign was planned to run for eight weeks with :60 second spots and traffic radio spots airing in Bakersfield, Sacramento/Stockton/Modesto, Salinas/Monterey and Fresno/Merced Designated Market Areas (DMAs). Digital Radio on Pandora ran concurrently and focuses on 339 designated, hard-to reach zip codes that represent lower CARE penetration rates, and High-Poverty and Rural zips.

PG&E began testing zip-targeted shared mail in late September to co-promote CARE and FERA in hard-to-reach Rural and High-Poverty areas. This included a Retail-Me-Not mailbox insert which deployed to approximately 2.5MM households. Door hangers began deploying at the end of September to approximately 269,000 households, with drops again in October and November. A ValPak insert sent via shared mail deployed in mid-October targeting approximately 700K households. All three tactics were produced as two-sided, English and Spanish language pieces. PG&E plans to continue to utilize these tactics and analyze results in the first half of 2020.

PG&E continued to deploy CARE/FERA bill inserts in 2019, with inserts going out in February, March, June, August, September and November. The insert included the dual CARE/FERA application. The June and August insert deployed to all non-CARE enrolled residential customers (approximately 2.9 million). All other months targeted customers flagged as CARE-eligible based on the CARE Propensity Model score (approximately 850,000). The August insert featured a more prominent FERA message. Preliminary results showed that the FERA-focused bill insert in August had a lower response rate than the version that leads with the CARE message, but this may be due to timing rather than the change in message. There was no significant increase in FERA enrollments with the FERA-focused bill insert, so a more balanced CARE/FERA co-promotion message will be used for inserts moving forward to drive both CARE and FERA enrollments.

A key challenge to increasing the penetration rate for FERA has been that FERA attrition rates were higher than CARE in 2018.¹³ In an attempt to mitigate the attrition impact, PG&E also leveraged successful CARE retention tactics for FERA. Like CARE, FERA-enrolled customers are required to recertify their eligibility every two years. An auto-recertification campaign has been in place for CARE since 2014, with customers in Deciles 1 and 2 being automatically recertified for the program.¹⁴ In mid-June, PG&E initiated an auto-recertification campaign for FERA, re-enrolling customers with a decile score of 1-3.¹⁵ PG&E sends these customers notification via email to alert them that they've been automatically re-enrolled in the FERA Program and no further action is required by the customer to continue to receive the FERA discount. This campaign will be executed ongoing on a monthly basis.

PG&E also launched email creative for a FERA recertification reminder campaign that mirrors that approach that has been in place for CARE since 2015. The campaign began deploying in July and will continue monthly to customers approaching their recertification due date. Email reminders are sent at 120-days, 90-days, 60-days and 30-days prior to recertification date to encourage customers to re-enroll.

The retention efforts will require in-depth analysis to determine the impact on overall attrition rate. PG&E plans to place additional focus on FERA retention efforts in 2020 to gain insight and identify opportunities for further testing.

PG&E continued to send program messaging via the monthly low-income targeted version of the digital newsletter. FERA was featured in the February newsletter, linking customers through to the CARE/FERA landing page. CARE and FERA were co-promoted in the newsletter in June, September and will also be featured in December.

A marketing message for FERA was included in the April/May direct mail issue of the Home Energy Report (HER). The message highlighted the 18% discount available to qualified households of three or more people, and the call-to-action provided a vanity URL that drove to the CARE/FERA landing page.

In compliance with the order to work with community-based organizations (CBO's) in the Central Valley to increase rates of FERA participation in 2019, PG&E identified and partnered with nine community-based organizations to deliver a culturally and linguistically specific outreach and enrollment effort. PG&E provided

¹³ CARE recertification rate in 2018 was 63 percent (excluding auto-recertification) versus FERA 2018 recertification rate of 9 percent.

¹⁴ The CARE propensity model assigns customers a Decile score from 1 to 10, with 1 being the most-likely to be CARE-eligible and 10 being the least likely to be CARE-eligible.

¹⁵ CARE auto-recertification is executed for Deciles 1-2, but since FERA has a slightly higher income qualification, PG&E expanded auto-recertification to Deciles 1-3 for FERA.

relevant training and support to these CBOs. Training included increase awareness around assistance programs. Assistance program training included ways to save money using online tools like energy education and energy management tools. For example, Bill Alerts to avoid the surprise of a high bill, correct rate selection, Home Energy Check to do self-home audits and Bill Forecast alerts giving customers time to reduce their home energy usage before their statement arrived. Additionally, CBOs were trained on energy education assistance programs that focused on CARE, FERA, and Medical Baseline. These CBOs focused on getting new enrollments from our hard-to-reach customers. Outreach goals were to increase enrollment in Bill Forecast Alerts, Home Energy Checkups, Medical Baseline and CARE/FERA.

For this outreach initiative, PG&E prioritized the nine counties based on high FERA eligibility and in partnership with CBOs did outreach in these counties. The counties are Alameda, Fresno, San Joaquin, Contra Costa, Kern, Solano, San Mateo, San Francisco, and Santa Clara. Outreach Event types included presentations at Community Workshops with 5-20 individuals gathering specifically to discuss services, Community Events that included tabling at PG&E local offices, cooling centers; Fairs / Festivals, or Open Houses. CBOs worked with new and existing clients in one-on-one conversations and Door-to-Door outreach campaigns that targeted areas where representative(s) approached domiciles.

CBO outreach and education occurred through 59 Community workshops, 148 Events and 618 door to door campaigns resulting in an average of 4,055 customers touched¹⁶ and 3,699 customers educated¹⁷ in six counties. Combined efforts resulted in 532 processed FERA and CARE applications. In that total, 197 customers were enrolled in CARE and three enrolled in FERA.

Conclusion

In conclusion, this letter contains the 2019 FERA results as is required by Decision Decision (D.) 18-08-013, issued on August 17, 2018

Protests

This is an information-only advice letter submittal. Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this advice letter and is not subject to protest. Instead, PG&E is reporting progress to increase FERA program enrollment.

¹⁶ Customer Touch definition: A brief interaction with a customer where they receive a brochure or application to take with them.

¹⁷ Customer Education definition: Customer actively completes a form and returns to organization and / or customer gives their information for follow-up services with organization.

Effective Date

PG&E requests that this information-only advice submittal become effective December 19, 2019, 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 lists for A.16-06-013, A.14-11-007 et al., and A.19-11-003 et al. 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

cc: Service Lists in A.16-06-013, A.14-11-007 et al., and A.19-11-003 et al.



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) #: 5717-E

Tier Designation: Info-Only

Subject of AL: Information-only Advice Letter on Pacific Gas and Electric Company's Progress to Increase Family Electric Rate Assistance Program Enrollment per Decision (D.) 18-08-013.

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.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: 12/19/19

No. of tariff sheets: N/A

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: N/A

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
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Title:
Utility Name:
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City:
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Facsimile (xxx) xxx-xxxx:
Email:

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

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