

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



January 19, 2021

Advice Letter 5731-E, 5731-E-A

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: Summary of AB 2868 Behind-the-Meter (BTM) Thermal Storage Program in Compliance with Decision 19-06-032.

Dear Mr. Jacobson:

Advice Letter 5731-E, 5731-E-A is effective as of January 14, 2021, per resolution E-5073 Ordering Paragraphs.

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 19, 2020

Advice 5731-E-A
(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

Subject: Supplemental: Summary of AB 2868 Behind-the-Meter (BTM) Thermal Storage Program in Compliance with Decision 19-06-032

Pacific Gas and Electric Company (PG&E) submits responses to questions received from Energy Division in a request for supplemental advice letter dated June 9, 2020. This advice letter supplements previously submitted advice letter 5731-E.

Purpose

This advice letter supplements previously submitted advice letter 5731-E, which provided program and implementation details for PG&E's proposed behind-the-meter thermal storage program, pursuant to Ordering Paragraph (OP) 4 of Decision (D.) 19-06-032.

Background

On December 31, 2019, PG&E submitted its Tier 3 advice letter 5731-E in response to the Commission's request for more information on the following:¹

- The specific actions PG&E will take to prioritize public sector and low-income customers
- A clear explanation on what customer outreach PG&E will conduct to ensure its customers understand how their rates will change and what the bill impact would have been based on historical usage
- How PG&E is deploying energy management systems, or another mechanism, that provides controls that ensure that the projects will reduce dependence on petroleum, meet air quality standards, and reduce greenhouse gas emissions

¹ On June 27, 2019, the Commission adopted D.19-06-032, which, among other issues, authorized PG&E to move forward with the Program subject to submitting a Tier 3 advice letter that includes additional program details, prior to PG&E launching the Program.

- A quantitative estimate for the reduction in energy demand, which in some cases involved fuel switching away from propane, from this program

After its review, Energy Division requested that PG&E a supplemental Advice Letter to respond to additional questions and comments,² which are listed in the section below.

Responses to Energy Division

1) Does the WatterSaver program intend to provide appliance incentives for the replacement of propane and electric resistance water heaters? If appliance incentives are to be offered for these individual technologies, please provide incentive amounts.

The WatterSaver program does not plan to provide rebates for any replacement of electric resistance water heaters but does plan to provide appliance incentives for a small number of heat pump water heaters (HPWHs) to replace existing propane water heaters.

Propane to HPWH Incentives and Participant Types

- 75 low-income participants (PG&E CARE and/or those that are enrolled in SASH, DAC-SASH, or SGIP-Equity)
 - \$2,000 per HPWH
 - Total Incentive Budget \$150,000
- 50 general market participants
 - \$1,000 per HPWH
 - Total Incentive Budget \$50,000
- Overall Incentive Budget \$200,000

2) What will the one-time enrollment incentive and monthly performance incentive amounts offered to residential customers be?

It is anticipated that residential customers will receive a \$50 incentive at time of enrollment. These enrollment incentives are subject to change based on field and customer responses.

It is anticipated that for each month a residential customer continues to satisfactorily participate in the program they will receive a participation incentive of \$5/mo, which will be paid every 3 or 6 months. These incentive amounts and payment intervals are subject to change based on field and customer responses.

3) How will small commercial participant incentives be calculated?

² Supplemental Advice Letter Request, 5731-E, dated June 9, 2020.

Electric tank type water heaters will be eligible for commercial participation incentives, including smart control devices retrofitted to electric resistance water heaters (ERWHs) and smart enabled HPWHs. It is anticipated that the participation incentives will be approximately \$7/month for water heaters with a maximum input capacity of less than 10kW and approximately \$15/month for water heaters with a maximum input capacity of 10 kW or more. These incentives will be paid every 3 or 6 months after confirmation of satisfactory participation. In order to streamline commercial customer participation and incentive processing, it is expected there will not be an upfront enrollment incentive and thus the monthly participation incentives are increased accordingly. These incentives will be subject to change during the course of implementation based on field and customer responses.

4) Please specify which residential Time of Use (TOU) rate customers will be required to enroll in to participate in the WatterSaver program.

The PG&E E-TOU-C rate schedule will be required for eligible customers receiving either PG&E bundled and unbundled electric service. The E-TOU-C rate schedule offers a daily peak pricing period from 4pm-9pm. All other times offer off-peak pricing.

Exceptions to this requirement will be offered to eligible PG&E bundled and unbundled electric customers who already receive service through a PG&E time varying rate (including any existing PG&E TOU and Electric Vehicle [EV] rates) and those customers who will be dual participants in the San Joaquin Valley Electrification Pilot programs.

Though the WatterSaver Program will provide customer education about the opportunity to adopt the E-TOU-C rate structure, the program will exempt San Joaquin Valley (SJV) Electrification Pilot participating customers from the requirement to adopt the E-TOU-C rate schedule as these customers will receive recommendations from the SJV pilot administrators to remain on or enroll in the PG&E E-1 tiered rate structure post customer participation in the SJV Electrification pilot program.

5) Based on the required TOU rate for residential customers, calculate the estimated bill savings, including program performance incentive payments for the projected number of both HPWHs and electric resistance water heaters in the program.

The typical control strategy for maximizing load shift potential for a HPWH would be to pre-heat and store the water at high temperatures prior to the load shift event, which can result in the highest load shift savings potential and the highest resulting cost-effectiveness. However, at higher stored water temperatures, heat pump water heaters can experience reduced coefficients of performance and modest stand by loss increases, which have the overall result of increased daily kWh consumption relative

to an uncontrolled water heater. The peak to off-peak price differential of a TOU rate plays an important role in determining the utility bill benefit to a customer in this situation. For WatterSaver, the controls strategy will be optimized based on the participant's current TOU rate plan so that the customer's utility bill results in no increased costs due to water heater load shifting, and in many cases will result in utility bill reductions.

Using simulation data available today for heat pump water heater customers on the PG&E E-TOU-C rate, it is expected that WatterSaver program participation may not impact customer bills positively or negatively in the absence of any customer behavioral changes as a result of TOU education. The program will educate customers on how to optimize their behavior in order to maximize bill savings on a TOU rate, and additional savings are anticipated based on behavior changes alone. Though customers with smart control devices retrofitted onto their electric resistance water heaters will have a minimal increase in overall daily kWh consumption, annual utility bill cost reductions of approximately \$20/year are expected using the peak and off-peak price differentials of the E-TOU-C rate schedule.

6) How will residential and commercial customers on an existing TOU or Electric Vehicle (EV) rate enroll in the program?

The WatterSaver Program will market to all eligible PG&E bundled and unbundled electric service residential and small commercial customers who either have an existing electric water heater or else are upgrading their electric, natural gas, or propane water heater appliance to a heat-pump water heater. Eligible customers with either bundled or unbundled PG&E electric service delivered through existing TOU and EV rate schedules may elect to participate in the WatterSaver program without enrolling in a different electric rate schedule.

Per our response to question four above, bundled and unbundled PG&E electric service customers who do not have existing service through an existing TOU or EV electric rate schedule will be required to adopt the PG&E E-TOU-C rate schedule.

7) Update the Measurement and Verification chart on page 8 of the A.L. to reflect any appliance incentives offered through the program, the updated residential customer bill savings, as well as any program performance incentives.

	Controlled Units	kW/ unit	kWh/ unit	MW total	MWh/ day total	kg CO2e/ day/ unit	Total kg CO2e/Day	Estimated Bill Savings/ Unit/ yr (E-TOU-C)	Estimated Bill Savings/ year	Average Customer Incentives Per Year
Res HPWH	6400	0.28	0.67	1.79	4.29	0.27	1,759	\$0	\$0	\$72.50

Load Shift										
Res ERWH Load Shift	1112	0.51	1.88	0.57	2.09	0.78	869	\$20	\$22,240	\$72.50
Com HPWH Load Shift	67.2	1.40	3.35	0.09	0.23	0.82	55	\$0	\$0	\$132
Com ERWH Load Shift	28	1.53	5.64	0.04	0.16	3.91	109	\$60	\$1,680	\$132
			TOTAL	2.50	6.76		2,793		\$23,920	

	Units	Estimated Propane Bill Savings/unit/year	Estimated New Electricity Costs/unit/year	Total Estimated Lifetime Bill Savings	Total Appliance Incentives
Propane to HPWH Appliance Replacement	125	\$465	\$(318)	\$183,750	\$200,000

8) Provide a program budget that, at a minimum, shows program incentive costs, outreach and education costs, and program administration costs.

Administrative	\$447,218
Marketing	\$606,630
Direct Implementation Non-Incentives	\$2,124,956
Incentives	\$3,138,192
Total Program Budget	\$6,316,996

Administrative and Marketing costs follow traditional CPUC definitions. Direct Implementation Non-Incentives includes overall program design and implementation, customer enrollment and support, coordination with non-WatterSaver heat pump water heater installation and rebate programs, and load shifting software, management, analysis, and technical services. Incentives are inclusive of customer enrollment and participation incentives, propane to heat pump appliance incentives, program provided material and labor subsidies for mixing valves and water heater control hardware, and control communication protocol costs.

9) WatterSaver proposes to leverage existing programs to enroll HPWHs at an expedited rate. Energy Division appreciates this strategy but has concern over how “leveraged programs” will claim program attribution. Please explain the

WatterSaver team's approach to tracking any leveraged program attribution, including projected energy savings.

The WatterSaver program will be available to eligible customers who have installed a HPWH prior to participation. In certain scenarios, these customers may have received a ratepayer funded appliance incentives to purchase and install this HPWH. These "leveraged programs" will be responsible for reporting and claiming program costs and benefits based on their respective program rules. In all cases where the WatterSaver program is not responsible for funding a HPWH appliance incentive, the WatterSaver Program will not report any costs associated with the HPWH appliance, nor will the program claim any benefits associated with the basic operations and the standard efficiencies of the HPWH.

In addition to keeping individual participant records of the leveraged programs that assisted in WatterSaver program customer enrollments, the WatterSaver program will only claim the benefits associated with the load-shifting and thermal storage activities enabled through the program's active monitoring and control of the enrolled devices. Likewise, the WatterSaver program will only report the costs associated with the load-shifting and thermal storage devices and the controls/communications platform necessary to achieve these goals.

The WatterSaver program will achieve this separation of the standard HPWH efficiency benefits and the thermal storage load-shifting benefits comparing the energy use profiles of non-controlled HPWHs against the energy use of those devices actively receiving load-shifting signals and claiming only the difference between the two.

As mentioned in response to question one above, the WatterSaver program will be responsible for providing customer incentives to purchase and install HPWHs when they retire aging propane water heaters. As an exception to the above statements, in this propane electrification use case, the WatterSaver program will report the costs and benefits associated with the HPWH as well as the load-shifting and thermal storage activities.

10) Please explain if the WatterSaver program will utilize any additional control strategies besides the daily Time-Of-Use (TOU) shifting strategy identified in the advice letter.

Initially, the WatterSaver program will utilize control strategies to reduce peak water heating load within the 4pm-9pm timeframe. These strategies serve the approved program goals by providing both customer bill savings as well as ratepayer benefits according to the electric avoided cost calculator.³ Other control strategies may be investigated if requested by the CPUC.

³ <https://www.cpuc.ca.gov/General.aspx?id=5267>

11) Please provide a cost effectiveness showing for the WatterSaver program. The cost effectiveness showing should quantify the participant and utility benefits of the program and include any modifications made in response to questions asked in this supplemental advice letter request.

The below table depicts two cost benefit calculations both of which include total program costs, participant costs, participant benefits when propane bill reductions are generated, and avoided cost calculator (ACC) electric model benefits. This cost-benefit test has similarities to existing analyses available in the California Standard Practice Manual⁴, but is currently a trial evaluation methodology developed for the WatterSaver Program. PG&E will work with the Commission and the stakeholder community to develop an application of the total resource cost (TRC) test before the final evaluation of the WatterSaver program. It is important to note that no values were adjusted to account for net-to-gross (NTG) figures, spillover, or market effects.⁵

Recognizing that the WatterSaver program will be serving participants in three distinct use cases, the below table depicts three “sub-programs.”

1. Participants utilizing smart control devices retrofitted on existing electric resistance water heater appliances (ERWH Sub-Program).
Costs are equal to ratepayer funded program costs as participants are able to receive program services with no additional investment.
Benefits are equal to ACC benefits using only the load-shifting/thermal storage benefits provided by program’s active monitoring and control of the participating smart control devices.
2. Participants utilizing smart control devices either embedded within or retrofitted onto HPWHs (HPWH Sub-Program).
Costs are equal to ratepayer funded program costs as participants are able to receive program services with no additional investment.
Benefits are equal to ACC benefits using only the load-shifting/thermal storage benefits provided by the program’s active monitoring and control of the participating smart control devices and smart control enabled HPWHs.
3. Participants receiving incentives to purchase and install smart control enabled HPWHs and retire propane water heaters (Propane Electrification Sub-Program).
Costs are equal to ratepayer funded program costs as well as the participant costs associated with the purchase of a smart control enabled HPWH

4

https://www.cpuc.ca.gov/uploadedFiles/CPUC_Public_Website/Content/Utilities_and_Industries/Energy_-_Electricity_and_Natural_Gas/CPUC_STANDARD_PRACTICE_MANUAL.pdf

⁵ Currently distributed generation programs do not include net to gross effects in calculation of cost benefit analysis. Currently energy efficiency programs (including low income programs) and demand response programs do account for NTG ratios in benefit cost analysis.

Benefits are equal to:

- a. ACC negative benefits associated with increased electricity usage as a result of operating a new electric HPWH.
- b. ACC positive benefits using the load-shifting/thermal storage benefits provided by the program's active monitoring and control of the participating smart control enabled HPWHs.
- c. Participating customer propane bill reductions as a result of retiring their existing propane water heating appliance.

The table goes on to depict two "scenarios" under which the program may be able to provide ACC benefits to the ratepayer:

1. Program benefits extend for 10 years from installation date.
This scenario recognizes that the smart control devices installed or enabled through the WatterSaver program have the ability to provide ACC benefits through their expected useful life of 10 years.
2. Program benefits extend only through the end of the approved program period.
This scenario recognizes that despite the installed or enabled devices' capability to provide benefits for 10 years, there is the possibility that these devices will discontinue providing ACC benefits once the program ends.

PG&E is providing these details to show that this program may be able to offer a cost/benefit ratio above 1.0, but that such a result is highly dependent on how the program will be implemented and on what guidelines are available for a cost-effectiveness test.

As the below table shows, the least cost-effective "sub-program" is focused on controlling retrofitted or smart control enabled HPWHs. PG&E recognizes that promoting the adoption and integration of such appliances is important to help California reach its 2030 and 2045 carbon reduction goals; however, the short-term ACC benefits are minimal.

PG&E supports using the cost-effectiveness calculations depicted in scenario one below. PG&E believes this scenario most accurately depicts the ACC benefits provided to ratepayers in exchange for the program and participant funds utilized to deliver the program. With the exception of customers dual participating in the San Joaquin Valley Electrification pilot programs, all WatterSaver participating customers will need to adopt or remain on an existing TOU or EV electric rate schedule. As such, we can expect these customers to continue adhering to the load-shifting/thermal storage control strategies utilizing their smart control devices or smart control enabled HPWHs even after the program has ceased providing participation incentives. This can be expected as the former WatterSaver participating customers will be able to realize bill savings as a result of their continued adherence to the load-shifting/thermal storage protocols.

Prior to concluding, the WatterSaver program will ensure that the smart control devices and smart enabled HPWHs installed or enabled through the program have the capability to provide customers load-shifting/thermal storage control strategies without the monitoring or direct control provided by the WatterSaver program.

Recognizing that continued customer participation cannot be guaranteed in all cases, scenario one incorporates an “attrition” rate of 20% where 100% of ACC benefits are guaranteed through the end of the approved program period, but only 80% of ACC benefits are incorporated into the table between the end of the program and the end of the 10 year EUL of the smart control device or the smart enabled HPWH.

Finally, PG&E understands that both the WatterSaver program and the below cost-effectiveness tests are without precedent. While PG&E looks forward to further engagement from both the demand side management program evaluation as well as the wider stakeholder communities, we hope these engagements can happen in parallel to program approval and deployment.

	ERWH Sub-Program Cost/Benefit Ratio	HPWH Sub-Program Cost/Benefit Ratio	Propane Electrification Sub-Program Cost/Benefit Ratio	Total Costs	Total Benefits	Total Cost/Benefit Ratio
Scenario 1: Program benefits extend for 10 years from installation date	2.22	0.80	1.07	\$6,355,246	\$ 6,693,851	1.05
Scenario 2: Program benefits extend only through the end of the approved program period	0.68	0.23	0.88	\$6,355,246	\$ 2,247,846	0.35

The WatterSaver program will continue to evolve over time, including modifications to program details such as total customer enrollments, incentive design, and cost-effectiveness methodologies. These revisions may contribute to the success of the program as new data is collected and the program is implemented over the next five years. PG&E plans to continue collaboration with the Commission and stakeholders to meet program goals.

Protests

*****Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than July 9, 2020, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

This advice letter supplements previously submitted advice letter 5731-E. PG&E requests that this supplemental advice letter become effective upon Commission approval.

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/>.

/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Gabe Petlin, Energy Division
Kanya Dorland, Energy Division
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 U39E)

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) #: 5731-E-A

Tier Designation: 3

Subject of AL: Supplemental: Summary of AB 2868 Behind-the-Meter (BTM) Thermal Storage Program in Compliance with Decision 19-06-032

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.19-06-032

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:

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

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

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