

PUBLIC UTILITIES COMMISSION  
505 Van Ness Avenue  
San Francisco CA 94102-3298



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 5792E**  
**As of May 5, 2020**

Subject: Update to Residential Electric Vehicle Charging Rate Transition Plan Approved in Advice Letter 5546-E

Division Assigned: Energy

Date Filed: 03-24-2020

Date to Calendar: 03-27-2020

Authorizing Documents: None

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>04-30-2020</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

[PGETariffs@pge.com](mailto:PGETariffs@pge.com)

**PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to  
**[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)**

March 24, 2020

**Advice 5792-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Update to Residential Electric Vehicle Charging Rate Transition Plan Approved in Advice Letter 5546-E****Purpose**

PG&E provides an update to the Residential Electric Vehicle (EV) Charging Rate Transition plan previously approved in Advice Letter 5546-E.

**Background**

On May 17, 2019 PG&E received approval of Advice Letter 5546-E, which outlined the transition plan for Electric Schedule EV, Rate A, to Schedule EV2. After the completion of the first annual transition in 2019, PG&E has outlined minor changes to transition timelines to mitigate potential delays due to Public Safety Power Shutoff (PSPS) events as well as updates to the NEM2 tariff with clarification regarding grandfathering eligibility.

The EV-A rate closed to new enrollments on July 1, 2019, at the same time that the EV2-A rate launched. All customers who were not eligible to remain on the rate were to be transitioned to EV2-A as part of an annual process that began in 2019 and will conclude in 2025.

**Summary of 2019 Transition:**

Customers were identified as eligible to transition to EV2-A if they met the following conditions:

- Had an active account on the EV-A rate
- The account was not pending removal from EV-A due to exceeding the 800% of baseline eligibility criteria
- Customer did not meet Net Energy Metering (NEM) grandfathering criteria

Transition Status	Total # of Customers
Total customers on EV-A rate on July 2, 2019	58,271
Customers transitioned to EV2-A in 2019	41,325
NEM customers eligible for grandfathering on EV-A	10,246
NEM customers waiting to transition in 2020 <sup>1</sup>	6,700

PG&E discovered inadvertent errors in identifying customers for transition during the initial process of communicating the November rate transition to eligible customers. This led to miscommunications to some NEM grandfathered customers<sup>2</sup>. As a result, in order to prevent an erroneous transition from EV-A to EV2-A, PG&E placed NEM customer transitions on hold as of November 2019 while corrections were made to the internal processes of identifying which customers are eligible for remaining on the EV-A rate.

Additionally, due to the timing of communications and transitions taking place during the months of September through December of 2019 which coincided with wildfire and PSPS events, there were delays to the transition start date due to internal PG&E resource constraints and PG&E's desire to limit customer communications not directly tied to wildfire and PSPS.

### **Transition of Customers from Electric Schedule EV, Rate A, to Electric Schedule EV2**

Taking into consideration lessons learned from the execution of its first annual EV-A rate transition, PG&E is rescheduling the timing of future transitions, including the 2020 transition, to take place in Spring instead of Fall to avoid overlap with potential future PSPS events. Transitions will take place over a 6-week period with a target start date in April of each year.

Current customers on Electric Schedule EV, Rate A will receive a notification approximately 30 days prior to their transition date. The messaging will emphasize the need to adjust their charging time to start at 12:00 AM instead of 11:00 PM to align with the off-peak period of the EV2-A rate and will also include information for how customers can determine the exact date of their transition based on their billing cycle.

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<sup>1</sup> PG&E analysis found that most NEM customers who experienced a delay in transitioning from EV-A to EV2-A in the Fall of 2019 did not experience a negative financial impact. PG&E is conducting bill analysis for the small percentage of customers negatively impacted and will issue bill credits to those customers.

<sup>2</sup> PG&E identified 1,734 NEM customers who received a miscommunication.

**Transition of Customers without a Smart Meter**

Customers who do not have a smart meter will be transitioned via a separate process since their meters cannot be updated remotely. These customers will also receive a transition notice and will be contacted during the month transitions start to schedule an appointment for a PG&E field employee to update their meters with the new rate peak periods.

**Summary of NEM Grandfathering eligibility process**

Determining NEM grandfathering is a complex process that requires lengthy analysis across different billing systems and databases that weren't designed to house dynamic fields. This process also involves layering different data sets to apply criteria associated with each NEM tariff and referencing multiple data fields including Permission to Operate date, who the original interconnection customer of record is, current account holder, and date of EV-A enrollment.

PG&E has modified its analysis to include all of these data points and has now finalized its list of customers who are eligible to remain on EV-A as a grandfathered NEM customer for up to 5 years. This list will be used to identify all customers to be transitioned to EV2-A during the 2020 – 2025 transitions based on their grandfathering expiration date. NEM grandfathered customers will also receive a notification informing them of their grandfathered status, its expiration date, and what to expect during their future transition to EV2-A.

**Grandfathering eligibility for customers who move into a home with existing Solar**

During this analysis PG&E found that there was ambiguity in the NEM2 tariff that it will now clarify. PG&E's position is that EV-A TOU grandfathering does not apply to a residential customer who moved into a home with existing NEM2 generation and thereafter became a NEM2 customer (New Occupant). This is true even where the prior occupant of the home took service under the EV-A TOU rate and NEM2. Accordingly, PG&E proposes to modify its Rate Schedule NEM2 to reflect this understanding.

Decision 15-07-0019, issued prior to the NEM2 decision, noted that "rates and rate structures change periodically" and while the CPUC was "endeavoring to avoid abrupt changes...individual hardships may occur." In providing a five-year TOU grandfathering period for solar customers in that decision, the CPUC emphasized that grandfathering was appropriate because the customer who had made the investment in solar had an expectation that the TOU rate would not change:

"We are sympathetic to the challenges faced by individual customers who have elected to install rooftop solar. As Vote Solar and others point out, these individual TOU customers may have made the investment in solar assuming that the TOU rate would not change. Rooftop solar installations are often designed to maximize generation during the

TOU rate peak periods that were in place at the time of installation. In keeping with the RDPs of customer acceptance and energy efficiency, we believe the impact of changing or closing TOU tariffs should be mitigated. This is consistent with Section 745's recommendation that the Commission strive to set default TOU periods that are appropriate for at least five years."

Based on the cited record noted above:

- (1) the Commission prefers more narrowly tailored measures than grandfathering as a policy matter; and
- (2) New Occupant did not invest in the system and thus would not have had a reasonable expectation that the existing TOU rate would continue.

### **Tariff Revisions**

PG&E seeks the following updates and clarifications to the NEM2 tariff.

Modify Rate Schedule NEM2 in the Rates Section (Sheet 5):

- A. Residential Customers on this tariff, who are:
  - i) the first customer who installs the REGF (that is, second or subsequent owners are not eligible) and
  - ii) required to take TOU rates prior to the implementation of default TOU rates for all residential customers, and
  - iii) on any TOU rate (including a TOU pilot rate) prior to the implementation of default residential TOU rates,

have the option to stay on that TOU rate for a period of five years from the date the customer commences the TOU rate.

This advice letter focuses on EV-A TOU rate, since most if not all of the customers that will be affected are on EV-A rate schedule; but this clarification would also apply to any customer on a residential TOU rate, who seek TOU grandfathering based on NEM2 tariff language.

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than April 13, 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, 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 submittal become effective the date of submittal, which is March 24, 2020.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.18-12-006, R.14-07-002 and A.16-06-013. 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](mailto: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**

Attachment 1: Tariffs  
Attachment 2: Redline Tariff

cc: Service List R.18-12-006, R.14-07-002 and A.16-06-013



# 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: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@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) #: 5792-E

Tier Designation: 1

Subject of AL: Update to Residential Electric Vehicle Charging Rate Transition Plan Approved in Advice Letter 5546-E

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 #:

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: 3/24/20

No. of tariff sheets: 0

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: See Attachment 1

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:

Clear Form

<b>Cal P.U.C. Sheet No.</b>	<b>Title of Sheet</b>	<b>Cancelling Cal P.U.C. Sheet No.</b>
46378-E	ELECTRIC SCHEDULE NEM2 NET ENERGY METERING SERVICE Sheet 5	44460-E
46379-E	ELECTRIC TABLE OF CONTENTS Sheet 1	46344-E
46380-E	ELECTRIC TABLE OF CONTENTS Sheet 6	46270-E



**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 5

RATES:  
(Cont'd.)

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

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

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

Residential Customers on this tariff, who are: (T)

- i. the first customer who installs the REGF (that is, second or subsequent owners are not eligible) and (N)
- ii. required to take TOU rates prior to the implementation of default TOU rates for all residential customers, and
- iii. on any TOU rate (including a TOU pilot rate) prior to the implementation of default residential TOU rates, (N)

have the option to stay on that TOU rate for a period of five years from the date the customer commences the TOU rate. (T)

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

(Continued)



**ELECTRIC TABLE OF CONTENTS**

Sheet 1

**TABLE OF CONTENTS**

<b>SCHEDULE</b>	<b>TITLE OF SHEET</b>	<b>CAL P.U.C. SHEET NO.</b>
Title Page.....		<b>46379-E</b> (T)
Rate Schedules.....	46267,46268,46269,45403, <b>46380</b> ,46266,43935,44177-E	(T)
Preliminary Statements.....	45406,44687,42856*,46219,41723,40591,44724,46345-E	
Rules.....	46346,43023,46109-E	
Maps, Contracts and Deviations.....	37960-E	
Sample Forms....	40925*,37631,45743,41573*, 37632,41152*,41153,37769,44035,40671,37169-E	

(Continued)

Advice 5792-E  
Decision

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

Submitted  
Effective  
Resolution

March 24, 2020



**ELECTRIC TABLE OF CONTENTS**

Sheet 6

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
	<b>Rate Schedules</b>	
	<b>Other</b>	
S	Standby Service .....40243,45231,40245,44675,40247,40248,40249,40250,40251,40252, .....40253,40254,44832,40256,44676,40258,40259,40260,40261-E	
SB	Standby Service .....45639,45640,45641,45642,46265,45644,45645,45646,45647, .....45648,45649,45650,45651,45652,45653,45654,45655	
E-BioMAT	Bioenergy Market Adjusting Tariff .....43634,43635,41023,43636,43637,43638*, .....43639,37749,37750,37751,41026,37753, .....37754,37755,37756,41027,41028,41029, .....43640,41030,37762,37763,43641-E	
E-CHP	Combined Heat and Power PPA .....30809,30810,30811,30812, 30813-E	
E-CHPS	Combined Heat and Power Simplified PPA.....30814,30815,30816, 30817-E	
E-CHPSA	Combined Heat And Power Simplified 500 kW PPA ..30825,30826,31679,31680,31681,31682-E	
E-DCG	DCG Departing Customer Generation, CG .....36593,36594,37148, .....37794,3251436595,36596,23252,23253,28405,23255-E	
E-DEPART	Departing Customers .....28859-E	
E-DRP	Demand Response Provider Services.....35430,37017-E	
E-ECR	Enhanced Community Renewables (ECR) Program.....40854,35739,44588, .....44589,35742,35743-E	
E-GT	Green Tariff (GT) Program .....40858,44595,44596,37964,37965-E	
E-NMDL	New Municipal Departing Load .....27453,32097,32098,32099, 29557,29558-,29559, .....29560,29561,29562,29563,29564-E	
E-NWDL	New WAPA Departing Load .....28581,28582,28862,28863, .....27448,27449,27450,27451, 27452-E	
E-LORMS	Limited Optional Remote Metering Services .....20194-E	
E-SDL	Split-Wheeling Departing Load.....28588,28589,28867,28868,27459, .....27460,27461,27462,27463, 27464-E	
E-STORE	Station Service For Storage Devices.....40238,40239,40240,40241,40242-E	
E-TMDL	Transferred Municipal Departing Load .....27465,28869,28870, .....35227,28961,30659,28608,25887,25888,25889,25890,25891-E	
NEM	Net Energy Metering Service .....35635*,36352,36353,35636, .....33901*,35637*,35638*,33904*,36562,36563,36564,35753,33909*,33910*, .....33911*,33912*,33913*,35643,33915*,35276,35644,36599,35704,35705,45716,45717 .....45718,45719,45720,45721,45722,45723-E	
NEM2	Net Energy Metering Service .....42929,45724,42930,37798, <b>46378</b> ,42931,42932,42933, (T) .....42934,42435,42436,42437,45725,42938,37809,37810,42939,37812, .....37813,42940,45726,37816,42941,37818,37819,42942,45727,45728, .....45729,45730,45731,45732,45733,45734,45735,45736,45737, 45738, 45739,45740-E	
NEMFC	Net Energy Metering Service For Fuel Cell Customer-Generators .... 37770,38187,37772,37773, .....37774,37775,32446,32447,37824,38231-E	
NEMBIO	Net Energy Metering Service for Biogas Customer-Generators.....30791,27254,27255, .....26140,27256,26142,27257,26144,37823-E	
NEMCCSF	Net Energy Metering Service for City and County of San Francisco .....28176,28177, .....28178,28179-E	
NEMV	Virtual Net Metering for a Multi-Tenant or Multi-Meter Property Served at the Same Service Delivery Point.....42055,42056,42057,31549,32806, .....31551,33921,31553,42058,42059,31556,31557,31558,31559,31560, .....42060,36566,32807,42061,31565,42062,33216,42063-E	
NEM2V	Virtual Net Energy Metering Service .....42044,37826,37827,37828,42045,37890, .....37831,37832,42046,42047,37835,37836,37837,37838, .....42048,37840,42049,37842,37843,37844,37845,42050*-E	

(Continued)

Advice 5792-E  
March 24, 2020

## **Attachment 2**

**Redline Tariff**



**ELECTRIC SCHEDULE NEM2  
NET ENERGY METERING SERVICE**

Sheet 5

RATES:  
(Cont'd.)

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

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

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

Residential Customers on this tariff, who are:

- i. the first customer who installs the REGF (that is, second or subsequent owners are not eligible) and
- ii. required to take TOU rates prior to the implementation of default TOU rates for all residential customers, and
- iii. on any TOU rate (including a TOU pilot rate) prior to the implementation of default residential TOU rates,

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

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

(Continued)

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