



**Pacific Gas and
Electric Company®**

Erik Jacobson
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

March 25, 2020

Advice 5793-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: PG&E's New Commercial Electric Vehicle (BEV) Rate Schedule in
Compliance with Decision 19-10-055.**

Purpose:

Pursuant to Decision (D.) 19-10-055, Pacific Gas and Electric Company (PG&E) is seeking approval for creation of a new Business Electric Vehicle (BEV) rate.

PG&E respectfully requests a disposition letter with an effective date by no later than April 13, 2020 in order to timely implement these changes on May 1, 2020.

Background

PG&E on November 5, 2018, filed Application (A.) 18-11-003 seeking approval of its new commercial rates for load servicing electric vehicle service equipment (EVSE) and the creation of a new rate for commercial customers choosing to take service on the rate. Decision (D.) 19-10-055 (Decision) approved PG&E's application on October 24, 2019.

Electric rates BEV-1 and BEV-2 (referred collectively as the "BEV rate") aim to improve the fuel costs of commercial EV charging, simplify rate structures and price signals for customers. The new rate schedule will accelerate transportation electrification by improving the total cost of ownership to EV drivers, fleets, and charging infrastructure developers, which should encourage further investments in clean transportation.

Ordering Paragraph (OP) 19 of Decision 19-10-055 requires PG&E to make its BEV rates available no later than March 1, 2020. PG&E submitted a request for extension of time to comply with the Decision on December 17, 2019. On December 24, 2019 the Executive Director of the California Public Utilities Commission (CPUC) approved PG&E's request for extension to implement the BEV rate in two phases. Phase 1 is scheduled to be available to customers by May 1, 2020 and includes the fundamental components of a rate including rate enrollment via PG&E call centers and standard billing. Phase 2 will be deployed October 1, 2020 and includes a wider array of features and functionality such as online rate enrollment, grace period and overage notifications, notifications around

enrollment and subscription level changes, and eligibility for NEM customers (see the attached Tariff Sheet for more details).

Proposed Tariffs

The BEV rate is designed for commercial EV charging purposes where the non-EV commercial usage and the EV charging usage is metered separately. Service under this schedule is based upon the availability of metering equipment and customer infrastructure improvements necessary for charging electric vehicles. The BEV rate is divided into low use (BEV-1) and high use (BEV-2) rate option to accommodate any size of commercial customers. The BEV-1 rate is for customers using utilizing electricity equal to or less than 100kW per billing cycle on Secondary voltage service; the BEV-2 rate is for customers utilizing electricity equal to or more than 100kW per billing cycle. Additionally, the BEV-2 rate is offered for Secondary and Primary voltage service.

Pursuant to D.19-10-055, the BEV rate has other unique features, such as a kW subscription (which replaces a demand charge), an overage fee for excess use of kW as well as grace periods that avoid overage fees for customers who recently enroll on a BEV rate, or notify PG&E that they have increased the amount of connected EV infrastructure (load) behind the meter.

More detailed explanations of rate eligibility and the mechanics of the rate are included in the pro-forma tariff sheet as Attachment 1.

The Tariff Sheets accompanying this Advice Letter are being submitted as pro-forma tariffs with illustrative rate values. PG&E will submit a Tier 1 Advice Letter with finalized rates for Commission approval prior to the availability of the BEV rate on May 1, 2020.

This submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

In order to implement this new BEV rate change on May 1, 2020, PG&E is requesting the protest period to be shortened to 9 days.¹ Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than April 3, 2020, which is 9 days² after the date of this submittal. Protests must be submitted to:

¹ General Order 96B section 1.3 Construction; Waiver or Variance, "... In a specific instance and for good cause, the Director of the appropriate Industry Division may shorten the protest and reply period under the General Rules."

² The 10-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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

Pursuant to General Order (GO) 96-B, Rule 5.2, and OP 8 of D.19-10-055, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on April 13, 2020.

PG&E respectfully requests a disposition letter with an effective date by no later than April 13, 2020 in order to timely implement these changes on May 1, 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 A.18-11-003. 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: Service List A.18-11-003



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) #: 5793-E

Tier Designation: 2

Subject of AL: PG&E's New Commercial Electric Vehicle (BEV) Rate Schedule in Compliance with Decision 19-10-055.

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.19-10-055

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:

Clear Form

Attachment 1

Pro-forma Tariff



**ELECTRIC SCHEDULE BEV
BUSINESS ELECTRIC VEHICLES**

Sheet 1

(N)
(N)

APPLICABILITY: Except as noted below, Electric Schedule Business Electric Vehicle (hereafter BEV) is an optional schedule that applies to commercial EV charging purposes where the non-EV commercial usage and the EV charging usage is metered separately. The designation "EV" includes battery electric vehicle or plug-in hybrid electric vehicle as well as low speed electric vehicles and electrically powered motorcycles or bicycles. This schedule is not available to residential or agricultural service for customers for which a residential or agricultural schedule is applicable with the exception of Multi-Family Accommodations as defined in Electric Rule 1¹, which qualify as commercial premises for purposes of BEV rate applicability.

(N)

Service under this schedule is provided at the sole option of PG&E and based upon the availability of metering equipment and customer infrastructure improvements necessary for charging. Beginning October 1, 2020 Net Energy Metering (NEM) customers will be eligible for the BEV rate as long as customers meet the BEV eligibility requirements of being commercial customers with separate meters for EV charging. For more information on which NEM Schedules are eligible, see the "Special Conditions" section entitled "NEM Eligibility".

The BEV rate has two distinct rate options: BEV-1 and BEV-2. The BEV-1 rate option is applicable to customers with kW usage at or below 100 kW. The BEV-2 is applicable to customers with kW usage at or above 100 kW. Note that customers may be on the BEV-1 or BEV-2 at usage of 100 kW based on the customer's preference. BEV-1 is for Secondary Voltage service, and BEV-2 was designed with a Primary and Secondary Voltage option. Transmission Voltage customers are eligible for enrollment on the BEV-2 Primary rate.

The BEV rate replaces the customer charge and traditional maximum kW demand charge with a subscription-based model for monthly kW allocation. Customers taking service on this rate schedule can use any amount of kW and kWh but will incur an "overage" fee if the kW usage exceeds a customer's self-designated subscription level. The specific mechanics of the subscription model and overage fee are described in more detail in the "Special Conditions" section.

TERRITORY: This rate schedule applies everywhere PG&E provides electric service.

RATES: Total bundled service charges are calculated using the total rates below. Direct Access (DA) and Community Choice Aggregation (CCA) charges shall be calculated in accordance with the paragraph in this rate schedule titled Billing.

(N)

¹ The Rates and Rules referred to in this schedule are part of PG&E's electric tariffs. Copies are available at PG&E's local offices and website at <http://www.pge.com/tariffs>.

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**ELECTRIC SCHEDULE BEV
BUSINESS ELECTRIC VEHICLES**

Sheet 2

(N)
(N)

RATES:(Cont'd.)

TOTAL RATE

	BEV-1	BEV-2-S (Secondary)	BEV-2-P (Primary / Transmission)
Total Energy Rates (\$ per kWh)			
Peak	\$0.32431	\$0.34630	\$0.33267
Off-Peak	\$0.13230	\$0.12740	\$0.12379
Super Off-Peak	\$0.10564	\$0.10413	\$0.10113
Block Size (kW)	10	50	50
Subscription Charge (per block)	\$12.41	\$95.56	\$85.98
Subscription Charge (\$ per kW)*	\$1.24	\$1.91	\$1.72
Overage Fee (\$ per kW)	\$2.48	\$3.82	\$3.44

Total bundled service charges shown on a customer's bills are unbundled according to the component rates shown below.

UNBUNDLING OF TOTAL RATES

	BEV-1	BEV-2-S (Secondary)	BEV-2-P (Primary / Transmission)
Energy Rates by Component (\$ per kWh)			
Generation:			
Peak	\$0.26282	\$0.28209	\$0.27171
Off-Peak	\$0.08026	\$0.07873	\$0.07573
Super Off-Peak	\$0.05487	\$0.05333	\$0.05153
Distribution***:			
Peak	\$0.01487	\$0.01261	\$0.01573
Off-Peak	\$0.00542	\$0.00274	\$0.00283
Super Off-Peak	\$0.00415	\$0.00487	\$0.00437
Transmission** (all usage)	\$0.02419	\$0.02419	\$0.02419
Transmission Rate Adjustments** (all usage)	\$0.00327	\$0.00327	\$0.00327
Reliability Services* (all usage)	(\$0.00067)	(\$0.00067)	(\$0.00067)
Public Purpose Programs (all usage)	\$0.01181	\$0.01129	\$0.01059
Nuclear Decommissioning (all usage)	\$0.00088	\$0.00088	\$0.00088
Competition Transition Charges (all usage)	\$0.00107	\$0.00104	\$0.00104
Energy Cost Recovery Amount (all usage)	(\$0.00057)	(\$0.00057)	(\$0.00057)
DWR Bond (all usage)	\$0.00503	\$0.00503	\$0.00530
New System Generation Charge (all usage)***	\$0.00161	\$0.00147	\$0.00147

* \$/kW for informational purposes only. This does not constitute an additional charge.

** Transmission, Transmission Rate Adjustments and Reliability Service charges are combined for presentation on customer bills.

*** Distribution and New System Generation Charges are combined for presentation on customer bills.

(Continued)

Advice 5793-E
Decision 19-10-055

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

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**ELECTRIC SCHEDULE BEV
BUSINESS ELECTRIC VEHICLES**

Sheet 3

(N)
(N)

**SPECIAL
CONDITIONS:**

1. **TIME PERIODS:** Times of the year and times of the day are defined as follows:

(N)

TOU Period	Times	Days
Peak	4:00 p.m. to 9:00 p.m.	Every day including weekends and holidays, all year
Off-Peak	9:00 p.m. to 9:00 a.m. and 2:00 p.m. to 4:00 p.m.	Every day including weekends and holidays, all year.
Super Off-Peak	9:00 a.m. to 2:00 p.m.	Every day including weekends and holidays, all year/

2. **SEASONAL CHANGES:** Schedule BEV has no seasonal variation.
3. **BILLING:** A customer's bill is calculated based on the option applicable to the customer as follows.

Bundled Service Customers receive supply and delivery services solely from PG&E. The customer's bill is based on the Total Rates set forth above.

Transitional Bundled Service Customers take transitional bundled service as prescribed in Rules 22.1 and 23.1, or take bundled service prior to the end of the six (6) month advance notice period required to elect bundled portfolio service as prescribed in Rules 22.1 and 23.1. These customers shall pay charges for distribution, transmission, transmission rate adjustments, reliability services, nuclear decommissioning, public purpose programs, the new system generation charge, the applicable Cost Responsibility Surcharge (CRS) pursuant to Schedule DA CRS or Schedule CCA CRS, and short-term commodity prices as set forth in Schedule TBCC.

(N)

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**ELECTRIC SCHEDULE BEV
BUSINESS ELECTRIC VEHICLES**

Sheet 4

(N)
(N)

SPECIAL
CONDITIONS:
(Cont'd)

4. BILLING (Cont'd.):

Direct Access (DA) and Community Choice Aggregation (CCA) Customers purchase energy from their non-utility provider and continue receiving delivery services from PG&E. Bills are equal to the sum of charges for transmission, transmission rate adjustments, reliability services, distribution, public purpose programs, nuclear decommissioning, the new system generation charge, the franchise fee surcharge, and the applicable CRS. The CRS is equal to the sum of the individual charges set forth below. Exemptions to the CRS, including exemptions continuous DA service, are set forth in Schedules DA CRS and CCA CRS.

	DA / CCA CRS	
	BEV-1	BEV-2
Energy Cost Recovery Amount Charge (per kWh)	(\$0.00057)	(\$0.00057)
DWR Bond Charge (per kWh)	\$0.00503	\$0.00503
CTC Charge (per kWh)	\$0.00107	\$0.00104
Power Charge Indifference Adjustment (per kWh)	BEV-1	BEV-2
2009	\$0.01918	\$0.01895
2010	\$0.02219	\$0.02186
2011	\$0.02308	\$0.02273
2012	\$0.02409	\$0.02370
2013	\$0.02426	\$0.02387
2014	\$0.02429	\$0.02389
2015	\$0.02435	\$0.02393
2016	\$0.02424	\$0.02382
2017	\$0.02429	\$0.02388
2018	\$0.02435	\$0.02394
2019	\$0.02615	\$0.02547
2020	\$0.04028	\$0.04794

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**ELECTRIC SCHEDULE BEV
BUSINESS ELECTRIC VEHICLES**

Sheet 5

(N)
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SPECIAL
CONDITIONS:
(Cont'd.)

5. DWR BOND CHARGE: The Department of Water Resources (DWR) Bond Charge was imposed by California Public Utilities Commission Decision 02 10 063, as modified by Decision 02-12-082, and is property of DWR for all purposes under California law. The Bond Charge applies to all retail sales, excluding CARE sales. The DWR Bond Charge (where applicable) is included in customers' total billed amounts.
6. SUBSCRIPTION: The kW subscription component of the BEV replaces a kW demand charge. The BEV rate does not include demand or customer charges and instead uses a monthly subscription for customer's kW demand. The subscription comes in blocks of 10 kW for the BEV-1 rate and in blocks of 50 kW or the BEV-2 rate. A customer determines their estimated maximum kW demand and then selects a subscription level to suit their need.
7. OVERAGE/OVERAGE FEE: An overage is incurred when a customer surpasses the kW allotment of their pre-determined subscription level outside of a grace period. Note that the customer's subscription level is determined by the customer and can be increased or decreased as the customer sees fit. The only exception to this is the case of a "lock out" when PG&E auto adjusts the customer on the fourth month of billing following a customer overage in the third billing period within the grace period.

Overage will be based on 15-minute intervals readings of the average kW usage. For example, a customer with a 50 kW subscription whose average demand exceeds 50 kW in a given 15-minute interval of the billing cycle is considered to have incurred an overage.

If a customer exceeds their subscription after the grace period, PG&E will bill them for their subscription amount and any overages in increments of 1 kW. Although a customer may exceed their pre-determined kW subscription level multiple times per billing period, a customer can only incur one (1) financial penalty associated with overage for each billing period. Overage fees are based on the maximum kW demand in a given billing period. For example, if a customer with a 60 kW subscription uses 61 kW of demand in a 15-minute window followed by a 65 kW of demand in another 15-minute window, the customer will only incur an overage fee for the 5 kW overage for that billing period. Note: In some cases, such as rate version changes or seasonal cross overs, more than one billing period may be included in a general PG&E billing cycle.

(N)

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**ELECTRIC SCHEDULE BEV
BUSINESS ELECTRIC VEHICLES**

Sheet 6

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SPECIAL
CONDITIONS:
(Cont'd.)

6. **GRACE PERIOD:** A grace period is a period of three (3) billing cycles in which a BEV customer is not subject to overage fees associated with exceeding the customer's monthly pre-defined kW subscription. A grace period is triggered under either or both of the following two conditions: (1) a BEV customer first enrolls in a BEV rate, and/or (2) the BEV customer adds additional charging infrastructure that increases the customer's load and the customer informs PG&E of these changes. These events are described in more detail below.
- a. **Customer Enrollment:** A grace period is triggered when a customer enrolls in a BEV rate.
 - i. A PG&E customer is eligible for a grace period when they enroll into a BEV rate. The grace period only applies to separate meters dedicated to electrical vehicle infrastructure and service equipment (EVSE).
 - ii. This means that customers who change from BEV-1 to BEV-2 (or vice versa) are eligible for a grace period upon enrollment in the new rate. For example, a customer that has been enrolled in the BEV-1 (≤ 100 kW) version of the rate and changes to BEV-2 (≥ 100 kW) - or vice versa - is eligible for a grace period.
 - b. **Addition of Electrical Vehicle Service Equipment (EVSE):** A second qualifying event for grace periods is if an existing customer enrolled on the BEV rate (BEV-1 or BEV-2) adds load supporting EVSE. In this case a customer must notify PG&E that they have increased the amount of EVSE infrastructure behind the meter, which will then trigger a grace period.
 - i. The main contributor to incremental increase in a customer's EV load is due to the addition of electrical vehicle chargers.

Note that an automatic adjustment of a customer's subscription level may occur at the end of a grace period for the following billing cycle. This would only occur if the customer had exceeded their subscription level on the third (and last) billing cycle of the grace period, in which case their subscription level for subsequent billing cycles would be automatically set to the overage amount from the third billing cycle of the grace period rounded up to the nearest kW block of subscription. The customer would be eligible to modify the subscription level again after three consecutive billing cycles following the end of the grace period.

Note that overage fees and grace periods will not be introduced to the rate until October 1, 2020. Customers who enroll on the BEV rate before October 1, 2020, will have a grace period introduced to their rates on or after October 1, 2020 depending on the start date of their billing period. These customers will not receive overage fees until three billing cycles have been completed after October 1, 2020.

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**ELECTRIC SCHEDULE BEV
BUSINESS ELECTRIC VEHICLES**

Sheet 7

(N)
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**SPECIAL
CONDITIONS:
(Cont'd.)**

9. NOTIFICATIONS: Customer agrees to provide and maintain at least one form of accurate notification for billing and financial related customer messages, which may include email or Short Message Service ("SMS"). If Customer subsequently opts out of SMS notifications, customer must agree to provide a current email for BEV notifications, such as overage fees, in order to be eligible for the rate.
10. METER: Customers eligible for this rate schedule must have an interval data meter that can be read remotely by PG&E.
11. SERVICE VOLTAGE: Please refer to Electric Rule 2 for information regarding service delivery voltages.
12. NEM ELIGIBILITY: Bundled service Net Energy Metering (NEM) customers taking service on NEM2S, NEM2EXP, NEM2EXPM, NEM2MT and NEM2PS are eligible for the BEV rate beginning October 1, 2020.

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	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		