

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



May 6, 2021

Advice Letter 4274-G/5876-E/-A/-B

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, P.O. Box 770000
San Francisco, California 94177

SUBJECT: Staff Disposition of PG&E's AL 4274-G/5876-E on Tariff Modifications to Implement Residential Disconnection Policies

Dear Mr. Jacobson,

The California Public Utilities Commission's (CPUC) Energy Division (ED) approves Pacific Gas & Electric Company's (PG&E) Advice Letter (AL) 4274-G/5876-E and Supplementals A and B, Tariff Modifications to Implement Residential Disconnection Policies, Pursuant to D.20-06-003, Ordering Paragraph (OP) 6, with an effective date of May 6, 2021. Based on its analysis, ED has determined AL 4274-G/5876-E and Supplementals A and B are compliant with the requirements of Decision (D.)20-06-003.

Attachment 1 contains a detailed discussion of the AL, the protest, replies and ED staff's determination that the AL and Supplemental ALs A and B are compliant with D.20-06-003 OP 6.

Please contact Ben Menzies of Energy Division at benjamin.menzies@cpuc.ca.gov should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "ERAND", followed by the word "FOR" in a bold, sans-serif font.

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

cc: Feby Boediarso, East Bay Clean Energy, fboediarso@ebce.org
R.18-07-005 Service List

Attachment 1

On June 16, 2020, the CPUC issued D.20-06-003 regarding new customer disconnection protections, which directed PG&E, along with other large investor-owned utilities (IOUs), to file a Tier 1 Advice Letter within 30 days modifying several elements of its tariff related to customer disconnections for nonpayment. On July 16, 2020, PG&E filed AL 4274-G/5876-E, proposing to modify its tariff to conform with multiple provisions of D.20-06-003.

On August 5, 2020, East Bay Community Energy (EBCE) timely protested AL 4274-G/5876-E, raising three objections:

- (1) First, EBCE requested that PG&E clarify its reference in tariff language to “community agencies” to which customers at risk of disconnection could be referred.
- (2) Second, EBCE argued proposed tariff language only allowed PG&E to offer 12-month payment plans at the company’s option, rather than meeting the requirement of D.20-06-003 that utilities must offer 12-month payment plans to all customers before disconnection.
- (3) Finally, EBCE requested that PG&E clarify the mechanism by which it would convey funds to Community Choice Aggregators (CCAs) whose customers enter into 12-month payment plans with PG&E.

PG&E replied to the protest on August 12, 2020. In response to EBCE’s first point of protest, PG&E clarified that it would refer customers at risk of disconnection to providers of the Low Income Home Energy Assistance Program (LIHEAP) or Relief for Energy Assistance through Community Help (REACH). To address EBCE’s second point of protest, PG&E indicated it would file a supplement addressing EBCE’s concern about tariff language offering 12-month payment plans to all customers (rather than at the company’s option) before disconnection. To address EBCE’s third point of protest, PG&E argued that modifications to PG&E’s tariff to alter the existing process of allocating payments made pursuant to payment plans were beyond the scope of issues appropriately addressed in a Tier 1 AL. ED staff finds that PG&E’s clarification that it will refer customers to LIHEAP or REACH providers is sufficient to resolve EBCE’s first point.

On September 22, 2020, PG&E submitted Supplemental AL 4274-G-A/5876-E-A, striking the tariff language allowing PG&E optionality in extending 12-month payment plans to customers at risk of disconnection. Then, on September 29, 2020, PG&E submitted Supplemental AL 4274-G-B/5876-E-B, removing the tariff language provided in Supplemental A that allowed PG&E to extend payment plans for “up to” 12 months, rather than binding the company to extending complete 12-month payment plans to all customers. Supplemental B therefore sufficiently addresses the concern raised in EBCE’s second point of protest.

Finally, regarding EBCE’s third point of protest, ED staff agrees with PG&E that a Tier 1 AL is an inappropriate vehicle for modifying PG&E’s tariff to change the current practice of partial payment allocation. PG&E AL 4274-G/5876-E and partial Supplemental filings A and B are approved with an effective date of May 6, 2021.

September 29, 2020

Advice 4274-G-B/5876-E-B

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Second Supplemental: Pacific Gas and Electric Company's Tariff Modifications to Implement Residential Disconnection Policies, Pursuant to D.20-06-003, Ordering Paragraph 6

Purpose

PG&E is supplementing Advice 4274-G-A/5876-E-A to clarify in Electric Rule 11.C.1 and Gas Rule 11.D.1 that PG&E offers all residential customers a 12-month payment plan prior to disconnection. Specifically, PG&E removes language in these tariffs which states that all residential customers are eligible for "up to" a 12-month payment plan prior to disconnection. This supplemental advice letter supplements the original advice letter but does not replace it in its entirety.

Background

On June 16, 2020, the Commission issued the *Phase I Decision Adopting Rules and Policy Changes to Reduce Residential Customers Disconnections for the Larger California-Jurisdictional Energy Utilities* (D.20-06-003). D.20-06-003 adopts policies to reduce residential disconnections in line with the long-term goals of Senate Bill (SB) 598.¹ Moreover, D.20-06-003, Ordering Paragraph (OP) 6 states:

If any of the rules adopted herein require changes to a utility's tariff, that utility shall promptly file an advice letter to implement such changes within 30 days of the issuance date of this decision. Provided that the changes are of a ministerial nature, a Tier 1 advice letter filing is acceptable for this purpose.

PG&E filed Advice 4274-G/5876-E on July 16, 2020 to implement changes to its tariffs to reflect the requirements adopted by the Commission in D.20-06-003.

¹ SB 598 was approved by Governor Brown on September 28, 2017 and requires the Commission to develop policies, rules, or regulations with a goal of reducing, by January 1, 2024, the statewide level of gas and electric service disconnections for nonpayment by residential customers.

On August 5, 2020, East Bay Community Energy (EBCE) submitted a protest to Advice 4274-G/5876-E that requested PG&E clarify if the payment plan offered to residential customers is required or optional by PG&E to prevent residential disconnections.

On August 12, 2020, PG&E filed a response to EBCE's protest which clarified that PG&E *will* offer all residential customers up to a 12-month payment plan prior to disconnection. PG&E explained its understanding that certain flexibility in the tariff language is warranted because if a customer accepts a 12-month payment plan and breaks the terms of the arrangement prior to completion, PG&E may offer a payment plan with a term other than 12 months on a case by case basis. PG&E stated that it would file a supplemental advice letter to Advice 4274-G/5876-E to clarify that it will offer all residential customers up to a 12-month payment plan prior to disconnection.

On September 22, 2020, PG&E filed Advice 4274-G-A/5876-E-A to clarify that it will offer all residential customers up to a 12-month payment plan prior to disconnection. PG&E included the phrase "up to a 12-month payment plan" to clarify that not all customers may elect to enroll in a 12-month payment plan when given the option—customers may decide that a shorter term better suits their needs. However, PG&E recognizes that this language inadvertently obscures PG&E's obligation to always offer residential customers the option to enroll in a 12-month payment plan and updates its tariffs accordingly.

Tariff Revisions

PG&E proposes the following revision to its Electric Rule 11.C.1:

~~PG&E may, at its option, extend payment arrangements to a customer who alleges an inability to pay. However, PG&E must extend~~ **offer** payment arrangements **for up to a twelve (12) month duration** to a customer who alleges an inability to pay. **This includes** when re: (1) either the customer or a full time resident in the customer's home qualifies for the medical baseline program (see Electric Rule 19).², ~~or are age 65 or older, and (2) the customer is willing to enter into a payment plan offered by the utility with a minimum four (4) month duration.~~ **PG&E may, at its option, extend offer additional payment arrangements to a customer who is unable to adhere to the terms of an existing arrangement.**

PG&E also proposes the following revision to its Gas Rule 11.D.1:

~~PG&E may, at its option, extend payment arrangements to a customer who alleges an inability to pay. However, PG&E must extend~~ **offer** payment arrangements **for up to a twelve (12) month duration** to a customer who alleges an inability to pay. **This includes** when re: (1) either the customer or a full time resident in the customer's home qualifies for the medical baseline program (see Gas Rule 19).³, ~~or are age 65 or older, and (2) the customer is willing to enter into a payment plan offered by the utility with a minimum four (4) month duration.~~ **PG&E may, at its option, extend offer additional payment arrangements to a customer who is unable to adhere to the terms of an existing arrangement.**

The affected tariff sheets are listed on the enclosed Attachment 1. For the convenience of the reader, PG&E has provided a redlined version of the revised tariffs in Attachment 2.

Protests

Given that this clarification is ministerial in nature, PG&E requests that the Commission waive the protest period, pursuant to CPUC General Order 96-B, Section 7.5.1.

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.1, and OP 6 of D.20-06-003), this supplemental advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 supplemental advice submittal become effective concurrent with original Advice Letter 4274-G/5876-E and 4274-G-A/5876-E-A, which is July 16, 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.18-07-005. 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 R.18-07-005



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 U39M)

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) #: 4274-G-B/5876-E-B

Tier Designation: 1

Subject of AL: Supplemental: Pacific Gas and Electric Company's Tariff Modifications to Implement Residential Disconnection Policies, Pursuant to D.20-06-003, Ordering Paragraph 6

Keywords (choose from CPUC listing): Compliance, Disconnect

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.20-06-003

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: 7/16/20

No. of tariff sheets: 6

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 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

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
36503-G	GAS RULE NO. 11 DISCONTINUANCE AND RESTORATION OF SERVICE Sheet 2	34868-G
36504-G	GAS TABLE OF CONTENTS Sheet 1	36192-G*
36505-G	GAS TABLE OF CONTENTS Sheet 6	36193-G*



GAS RULE NO. 11

Sheet 2

DISCONTINUANCE AND RESTORATION OF SERVICE

D. TERMINATION OF SERVICE FOR NONPAYMENT OF BILLS — RESIDENTIAL (T)

Monthly bills for residential service are due and payable upon presentation and will be considered past due if payment is not received by PG&E within 19 days after the bill is mailed to the Customer. (T)

When onsite to perform a disconnection of the gas service due to non-payment, the gas field representative will facilitate contact with a customer service representative or provide access to an online portal to assist the customer with making a minimum payment of 20% of the past due balance and establishing a payment arrangement to suspend gas service disconnection. In addition, reconnections following payment and payment arrangement agreement, and consistent with safety protocols,¹ will be completed within 24 hours. The customer will not be required to call another person to have their gas service reconnected once they make a payment. (N)

When a bill has become past due and the Customer has received notice in accordance with Rule 8 that service will be terminated for nonpayment, PG&E may terminate any and all services the Customer is receiving unless an exception described in Sections D.1² through D.3, below, applies. (T)

1. INABILITY TO PAY — RESIDENTIAL

PG&E must offer payment arrangements for a twelve (12) month duration to a customer who alleges an inability to pay. This includes when either the customer or a full time resident in the customer's home qualifies for the medical baseline program (see Gas Rule 19).³ PG&E may, at its option, offer additional payment arrangements to a customer who is unable to adhere to the terms of an existing arrangement. (T)

(L)
|
(L)

¹ For instance, gas reconnection may require coordination with the customer to complete pilot relights. (N)

² PG&E will suspend disconnections for non-payment, waive reconnection and return check fees, and waive security deposit fee requirements for reestablishment of service for customers affected by a disaster as described in the Emergency Consumer Protection Plan definition in Gas Rule 1. (T)

³ PG&E will work with customers to extend payment arrangements for any outstanding balances on their account for customers affected by a disaster as described in the Emergency Consumer Protection Plan definition in Gas Rule 1. (T)

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Part DS	Work Required by Others Balancing Account (WROBA)	33477-G
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Part DZ	New Environmental Regulations Balancing Account (NERBA)	34675,33812-G
Part EA	Natural Gas Leak Abatement Program Balancing Account (NGLAPBA)	33695-G
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Part EC	Emergency Consumer Protections Memorandum Account - Gas (ECPMA-G).....	34874*, 35019, 35020-G
Part FC	Rate Base Adjustment Memorandum Account (RBAMA)	35422-G
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ELECTRIC RULE NO. 11
DISCONTINUANCE AND RESTORATION OF SERVICE

Sheet 2

C. TERMINATION OF SERVICE FOR NONPAYMENT — RESIDENTIAL (T)

Monthly bills for residential service are due and payable upon presentation and will be considered past due if payment is not received by PG&E within 19 days after the bill is mailed to the customer. (T)

When a bill has become past due and the customer has received notice in accordance with Rule 8 that service will be terminated for nonpayment, PG&E may terminate any and all services the customer is receiving unless an exception described in Sections C.1¹ through C.3, below, applies. (T)

1. INABILITY TO PAY—RESIDENTIAL

PG&E must offer payment arrangements for a twelve (12) month duration to a customer who alleges an inability to pay. This includes when either the customer or a full time resident in the customer's home qualifies for the medical baseline program (see Electric Rule 19).² PG&E may, at its option, offer additional payment arrangements to a customer who is unable to adhere to the terms of an existing arrangement. (T)

Customers shall not be disconnected for nonpayment until PG&E offers to enroll eligible customers in all applicable benefit programs administered by PG&E. If PG&E has discussions with a customer prior to disconnection, PG&E shall inquire if the customer is interested in hearing about the applicable benefit programs. Residential customers must enroll in the applicable benefit program within two billing cycles of being made aware of the applicable benefit programs. (N)

Customers shall not be disconnected if they currently have a Low-Income Home Energy Assistance Program pledge pending. (N)

It is the customer's responsibility to contact PG&E to request payment arrangements. If payment arrangements are made, such payment arrangements will be by Amortization Agreement, as described in Section C.1.a., below, or by Extension Agreement, as described in Section C.1.b., below. (L)

(L)
|
(L)

¹ PG&E will suspend disconnections for non-payment, waive reconnection and return check fees, and waive security deposit fee requirements for reestablishment of service for customers affected by a disaster as described in the Emergency Consumer Protection Plan definition in Electric Rule 1.

² PG&E will work with customers to extend payment arrangements for any outstanding balances on their account for customers affected by a disaster as described in the Emergency Consumer Protection Plan definition in Electric Rule 1.

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Advice 5876-E-B
Decision D.20-06-003

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted September 29, 2020
Effective
Resolution



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Attachment 2

Redline Tariff Revisions



GAS RULE NO. 11
DISCONTINUANCE AND RESTORATION OF SERVICE

Sheet 2

**D. TERMINATION OF SERVICE FOR NONPAYMENT OF BILLS ~~OR CREDIT~~
~~DEPOSIT REQUESTS~~ — RESIDENTIAL**

(T)

Monthly bills for residential service ~~and credit deposit requests~~ are due and payable upon presentation and will be considered past due if payment is not received by PG&E within 19 days after the bill is mailed to the Customer.

(T)

When onsite to perform a disconnection of the gas service due to non-payment, the gas field representative will facilitate contact with a customer service representative or provide access to an online portal to assist the customer with making a minimum payment of 20% of the past due balance and establishing a payment arrangement to suspend gas service disconnection. In addition, reconnections following payment and payment arrangement agreement, and consistent with safety protocols,¹ will be completed within 24 hours. The customer will not be required to call another person to have their gas service reconnected once they make a payment.

(N)

When a bill ~~or credit deposit request~~ has become past due and the Customer has received notice in accordance with Rule 8 that service will be terminated for nonpayment, PG&E may terminate any and all services the Customer is receiving unless an exception described in Sections D.1⁴² through D.3, below, applies.

(T)

(T)

1. INABILITY TO PAY — RESIDENTIAL

~~PG&E may, at its option, extend payment arrangements to a Customer who alleges an inability to pay²³. However, PG&E must extend offer payment arrangements for a twelve (12) month duration to a cCustomer who alleges an inability to pay. This includes when re: (1) either the customer or a full time resident in the customer's home qualifies for the medical baseline program (see Gas Rule 19), or are age 65 or older, and (2) the customer is willing to enter into a payment plan offered by the utility with a minimum four (4) month duration.³ PG&E may, at its option, offer additional payment arrangements to a customer who is unable to adhere to the terms of an existing arrangement.~~

(T)

(L)

(L)

¹ For instance, gas reconnection may require coordination with the customer to complete pilot relights.

(N)

(N)

⁴² PG&E will suspend disconnections for non-payment, waive reconnection and return check fees, and waive security deposit fee requirements for reestablishment of service for customers affected by a disaster as described in the Emergency Consumer Protection Plan definition in Gas Rule 1.

(T)

²³ PG&E will work with customers to extend payment arrangements for any outstanding balances on their account for customers affected by a disaster as described in the Emergency Consumer Protection Plan definition in Gas Rule 1.

(Continued)



ELECTRIC RULE NO. 11
DISCONTINUANCE AND RESTORATION OF SERVICE

Sheet 2

**C. TERMINATION OF SERVICE FOR NONPAYMENT OF BILLS ~~OR CREDIT~~
~~DEPOSIT REQUESTS~~—RESIDENTIAL**

(T)

Monthly bills ~~and credit deposit requests~~ for residential service are due and payable upon presentation and will be considered past due if payment is not received by PG&E within 19 days after the bill is mailed to the customer.

(T)

When a bill ~~or credit deposit request~~ has become past due and the customer has received notice in accordance with Rule 8 that service will be terminated for nonpayment, PG&E may terminate any and all services the customer is receiving unless an exception described in Sections C.1¹ through C.3, below, applies.

(T)

1. INABILITY TO PAY—RESIDENTIAL

~~PG&E may, at its option, extend payment arrangements to a customer who alleges an inability to pay². However, PG&E must extend offer payment arrangements for a twelve (12) month duration to a customer who alleges an inability to pay. This includes when re: (1) either the customer or a full time resident in the customer's home qualifies for the medical baseline program (see Electric Rule 19), or are age 65 or older, and (2) the customer is willing to enter into a payment plan offered by the utility with a minimum four (4) month duration.² PG&E may, at its option, offer additional payment arrangements to a customer who is unable to adhere to the terms of an existing arrangement.~~

(T)

~~Customers shall not be disconnected for nonpayment until PG&E offers to enroll eligible customers in all applicable benefit programs administered by PG&E. If PG&E has discussions with a customer prior to disconnection, PG&E shall inquire if the customer is interested in hearing about the applicable benefit programs. Residential customers must enroll in the applicable benefit program within two billing cycles of being made aware of the applicable benefit programs.~~

(N)

~~Customers shall not be disconnected if they currently have a Low-Income Home Energy Assistance Program pledge pending.~~

(N)

It is the customer's responsibility to contact PG&E to request payment arrangements. If payment arrangements are made, such payment arrangements will be by Amortization Agreement, as described in Section C.1.a., below, or by Extension Agreement, as described in Section C.1.b., below.

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¹ PG&E will suspend disconnections for non-payment, waive reconnection and return check fees, and waive security deposit fee requirements for reestablishment of service for customers affected by a disaster as described in the Emergency Consumer Protection Plan definition in Electric Rule 1.

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