

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 24, 2020

PG&E Advice Letter 5917-E
SCE Advice Letter 4275-E

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**Subject: Staff Disposition of PG&E's AL 5917-E, and SCE's AL 4275-E Interconnection
Staffing Information, Pursuant to Decision 20-06-017**

Dear Mr. Jacobson, Dr. Stern, and Ms. Genao:

Pacific Gas and Electric Company (PG&E), and Southern California Edison (SCE) (collectively, the "IOUs") submitted Advice Letters (AL) 5917-E and 4275-E, respectively, requesting an Energy Division disposition that the ALs demonstrate compliance with Decision (D.) 20-06-017 regarding interconnection level staffing requirements by illustrating organizational design changes and various process and technical improvements to better facilitate processing of interconnection applications. The IOUs have explained to our satisfaction they have met the requirement of D.20-06-017. PG&E's AL 5917-E and SCE's AL 4275-E are approved with an effective date of November 24, 2020.

Appendix 1 contains a detailed discussion of the ALs, the protests, replies and staff's determination that the ALs are compliant with D.20-06-017, Ordering Paragraph (OP) 3.

Please contact Jose Aliaga-Caro of the Energy Division staff at jc5@cpuc.ca.gov if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "EDWARD RANDOLPH". To the right of the name, there is a small, enclosed handwritten note that appears to read "(for)".

Edward Randolph
Deputy Executive Director for Energy and Climate Policy / Director of Energy Division
California Public Utilities Commission

cc: PGETariffs@pge.com; AdviceTariffManager@sce.com; Karyn.Gansecki@sce.com;
jc5@cpuc.ca.gov; Justin.Regnier@cpuc.ca.gov; EDTariffUnit@cpuc.ca.gov; Brad@calssa.org;
Service Lists R.11-09-011, R.17-07-007, R.14-07-002 and R.19-09-009.

Appendix 1: Background and Disposition for PG&E's AL 5917-E, and SCE's AL 4275-E

Background

D.20-06-017—Adopting Short-Term Actions to Accelerate Microgrid Deployment and Related Resiliency Solutions (issued on June 17, 2020 in Rulemaking (R.) 19-09-009¹)—Ordering Paragraph (OP) 3 ordered:

Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit a Tier 2 Advice Letter within 60 days of the date of issuance of this decision, that demonstrates their compliance with the interconnection staffing requirements described in Section 4.1.3 of this decision. Each Advice Letter shall specifically propose plans to acquire additional staff as needed, or the internal process changes needed, to fulfill the goals of Section 4.1.3 of this decision. In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 3.

Section 4.1.3 of D.20-06-017 states that:

Upon the date of issuance of this decision, the utilities are each directed to submit a Tier 2 Advice Letter within - 60 days of this decision's effective date that Proposes plans to acquire additional staff, as needed, or the internal process changes needed, to fulfill the goals of this decision [to facilitate faster processing for all projects].

PG&E's AL 5917-E and SCE's AL 4275-E were submitted on August 17, 2020, to respond to this requirement.²

PG&E does not propose to acquire additional staff at this time, but proposes to acquire additional staff as needed. PG&E explains it has reviewed the structure of its Electric Generation Interconnection (EGI) and Distribution Planning teams and concluded that no additional staffing plans are necessary at this time. In accordance with Section 4.1.3 of D.20-06-017 PG&E describes various processes and technical improvements it has undertaken to fulfill the goals of the decision. PG&E explains the restructuring of the EGI team, which includes new roles dedicated to process improvement and technology implementation and that the EGI team is analyzing its organization design with the goal of redistributing functions within existing staff. PG&E briefly explains technological improvement efforts to portal enhancements to facilitate the processing of resiliency projects applications (e.g. Net Energy Metering (NEM)-Paired Storage projects). PG&E also describes its Customer Resiliency Support Program (CReSP), approved by Resolution E-5079, to expedite interconnection of generation projects which include: Momentary Parallel Operation Applicants of any size; and Non-Export Applicants 30 kilowatts (kW) or less.

¹ Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339 (Stern, 2018) and Resiliency Strategies.

² SDG&E's AL 3590-E was submitted in response to this requirement. SDG&E's AL was not protested, was approved separately by a standard disposition with an effective date of September 16, 2020, and is therefore not discussed.

Similarly, SCE does not propose to acquire additional staff at this time. SCE describes various process and technical improvements it has undertaken to meet the interconnection timelines established in Rule 21, as well as plans for additional improvements in the future. SCE discusses its PowerClerk Interconnect (PCI) portal for interconnection of NEM and NEM-Paired storage projects which launched in 2015, along with its PCI non-export tool for non-export projects. SCE also launched its Grid Interconnection Processing Tool (GIPT) in 2019 to process non-export interconnection requests and replace the PCI non-export tool.³ SCE claims these tools, along with the Single Line Diagrams also ordered per D.20-06-017 will reduce the number of application errors. SCE claims that based on 2nd quarter of 2020 data, 90% (out of 10,500) of NEM applications were processed in less than 10 days, and SCE is thus performing its obligations with success. SCE also describes its “Accelerated path to Permission to Operate” for qualifying stand-alone storage projects sized 10 kW or smaller to easily pass the Rule 21 Fast Track screens without requiring upgrades.

Protest by CALSSA, and Replies by the IOUs

The California Solar & Storage Association (CALSSA) filed timely, separate, protests to PG&E’s and SCE’s ALs on September 8, 2020.

CALSSA applauds PG&E’s and SCE’s process and technological improvements, but argues that the “Commission should require PG&E to increase staffing to its Electric Generation Interconnection team until it can demonstrate adherence to expected timelines for complex projects and responsiveness to minor issues for small projects”⁴ and for SCE to expand its interconnection staff and to report at regular intervals detailed information on staffing levels. CALSSA supports its argument by briefly discussing the draft Interconnection Program Evaluation^{5,6} report where PG&E was found to miss timelines for 33% and 45% of process steps for NEM systems and non-NEM systems respectively. Similarly, CALSSA argues that in the draft Interconnection Program Evaluation, SCE was found to miss timelines for 27% and 62% of process steps for NEM and non-NEM systems respectively.

PG&E and SCE and filed timely replies on September 15, 2020.

In its reply, PG&E states that CALSSA does not identify or explain how PG&E’s AL is non-compliant with D.20-06-17 and that CALSSA’s protest does not identify or meet the criteria of valid grounds for a protest as provided in General Order (GO) 96-B, Rule 7.4.2,⁷ and hence the protest should be

³ Proposed in SCE’s Application (A.) for 2018 General Rate Case (A.16-09-001)

⁴ CALSSA Protest to PG&E AL 5917-E at 1.

⁵ Guidehouse, LLC (Guidehouse) is conducting a comprehensive evaluation of California’s Investor-Owned Utility’s (PG&E, SCE and SDG&E) administration of the Rule 21 Interconnection Tariff to provide data and insight on adherence to requirements, business practices, and recommended improvement pursuant to Assembly Bill (AB) 2861 (Ting, 2016). A workshop was held on August 13, 2020 to discuss the draft report of Guidehouse’s findings. The slides for the workshop were circulated to the mailing list of Rulemaking (R.)17-07-007.

⁶ Guidehouse, Rule 21 Interconnection Program Evaluation Draft Report,” August 13, 2020, Slide 59.

⁷ GO 96-B, Section 7.4.2 states that: An advice letter may be protested on one or more of the following grounds:

- (1) The utility did not properly serve or give notice of the advice letter;
- (2) The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
- (3) The analysis, calculations, or data in the advice letter contain material errors or omissions;
- (4) The relief requested in the advice letter is pending before the Commission in a formal proceeding;

dismissed. PG&E also states that the report cited by CALSSA does not differentiate between PG&E or customer delays, and that the report is an initial evaluation through June 2019 and does not include 2020 performance data, which includes improvements made by PG&E as stated in its AL filing.

In its reply, SCE argues CALSSA relied on incomplete data in its analysis and does not properly reflect SCE's performance in meeting Rule 21 timelines. SCE points out that the final report is yet to be published and is pending comments from stakeholders. SCE states that the report used a select subset of NEM projects—a sample size of 85 out of 134,839 NEM projects, which is “not a true or full representation of the type, complexity or size of NEM projects that SCE interconnects under Rule 21.”⁸ SCE also argues that it is successfully performing its obligations as based on data from the 2nd quarter of 2020 as discussed in SCE’s AL, and that based on “recent data for both NEM and non-NEM non-export projects SCE meets its required milestones at a much higher frequency than suggest by [CALSSA].”⁹

Disposition

Energy Division Staff (Staff) has reviewed PG&E’s AL 5917-E and SCE’s AL 4275-E, CALSSA’s protests, and the IOUs’ replies.

Staff finds that the ALs are in compliance with D.20-06-017, OP 3. D.20-06-017 ordered the IOUs to (1) propose plans to acquire additional staff, as needed, or (2) describe the internal process changes needed, to fulfill the goals of the decision. Staff finds that the IOUs have sufficiently justified why, at this time, additional interconnection staff is not required by illustrating organizational design changes and various process and technical improvements to better facilitate processing of interconnection applications; the processes the IOUs describe demonstrate that the IOUs have taken necessary steps to ensure that the interconnection timing expectations will be met. The ALs thus meet the requirement of Section 4.1.3 of D.20-06-017 to describe the “internal process changes needed, to fulfill the goals of this decision [to facilitate faster processing for all projects]” and therefore warrant approval.

CALSSA argues additional staffing is required based on data from Guidehouse’s draft report. Staff finds that the Guidehouse draft report is preliminary, and a final analysis of the data is still to be determined.

Decision 20-06-017, OP 4 ordered the utilities to report, in a compliance filing due February 15, 2021, the results of the required actions the utilities have taken, which include the success in meeting Rule 21 interconnection timelines.¹⁰ Staff finds that this will inform the Energy Division of improvements needed, if any, to the IOUs interconnection process to meet the goals set in D.20-06-017.

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- (5) The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
 - (6) The relief requested in the advice letter is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require relitigating a prior order of the Commission.

⁸ SCE Reply to CALSSA Protest at 2.

⁹ SCE Reply to CALSSA Protest at 3.

¹⁰ OP 4 of D.20-06-017 states:

Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit compliance filing on February 15, 2021 in this proceeding and to Energy Division at energydivisioncentralfiles@cpuc.ca.gov, that describes the results of

For the foregoing reasons, Staff does not agree with CALSSA, and concludes that the IOUs have met the requirement of D.20.06-017; therefore, PG&E's AL 5917-E and SCE's AL 4275-E are approved.

the required actions described under Section 4.1.3. The utilities are ordered to discuss, with Energy Division, what specific information is necessary before filing the compliance filing. Nevertheless, items that must be reported in this compliance filing shall include: (a) description of the number of projects that utilized the interconnection proposals adopted in this decision; (b) the success in meeting Rule 21 interconnection timeliness; (c) if any project experienced a delay, the utility shall provide an explanation about why the project was delayed; and (d) the utilities shall track the number and type of projects that use the template-based interconnection process adopted in Interconnection Proposal 1.



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

August 17, 2020

Advice 5917-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: **Information Regarding Staffing Levels for PG&E's Interconnection Application Process, Pursuant to Decision 20-06-017**

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits this Tier 2 Advice Letter ("AL") in compliance with the California Public Utilities Commission ("CPUC", "Commission") Decision ("D.") 20-06-017 ("Decision") Ordering Paragraph ("OP") 3. The AL demonstrates compliance with Section 4.1.3 regarding interconnection staffing requirements by illustrating how PG&E has already made organizational design changes and will continue to examine whether additional changes are necessary to better facilitate the timely processing of applications.

Background

The Commission initiated Rulemaking ("R.") 19-09-009 to develop a policy framework surrounding the commercialization of microgrids and related resiliency strategies and to implement Senate Bill (SB) 1339 (Stern, 2018).

On December 20, 2019 the assigned Commissioner's Scoping Memo and Ruling was issued, adopting a scope and schedule for Track 1 of the proceeding. Track 1 addressed deploying resiliency planning in areas that are prone to outage events and wildfires, with the goal of establishing key microgrid and resiliency strategies as soon as possible. Subsequently, on January 21, 2020, Administrative Law Judge Rizzo issued a Ruling with Energy Division staff's ("Staff's") proposal on short-term actions related to microgrids and other resiliency strategies that could be initiated in early 2020 to reduce the impact of PSPS outages or other catastrophic events.

On June 11, 2020, the Commission adopted D.20-06-017, which approves certain Staff proposals for prioritizing and streamlining interconnection applications to deliver resiliency services at key sites and locations. This Advice Letter addresses the requirements included in OP 3 of D.20-06-017, which requires:

3. *Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) shall each submit a **Tier 2 Advice Letter** within **60 days of the date of issuance** of this decision, that **demonstrates their compliance with the interconnection staffing requirements described in Section 4.1.3 of this decision.***

Each Advice Letter shall specifically propose plans to acquire additional staff as needed, or the internal process changes needed, to fulfill the goals of Section 4.1.3 of this decision.

In this Advice Letter submittal, PG&E, SCE, and SDG&E shall reference compliance with this decision pursuant to Ordering Paragraph 3. [emphasis added; reformatted to highlight key requirements]

PG&E submits this Tier 2 Advice Letter in compliance with Ordering Paragraph 3 of D.20-06-017.

Discussion

With regards to interconnection staffing levels, PG&E's Electric Generation Interconnection (EGI)¹ and Distribution Planning teams plan to acquire additional staff as needed, or modify internal processes as needed. At this time, PG&E does not propose to acquire additional staff. The EGI team underwent a restructure in February 2020 to gain efficiencies. New individual contributor roles dedicated to process improvement and technology implementation were established. Also, new leaders were appointed at the supervisor, manager and director levels. In addition, PG&E has reviewed its Distribution Planning team and no additional staffing plans are seen as necessary at this time, but again that could change as the need arises.

The EGI team is currently in the process of analyzing its organizational design, with the goal of optimally redistributing functions within its existing headcount. Complementing that effort, EGI is continuously implementing technology improvements. As things stand today, PG&E has effectively automated 98% of the Rule 21 portfolio. Upcoming technological improvement efforts include portal enhancements to better facilitate the processing of applications for resiliency projects such as NEM-Paired Storage projects. This has a tentative go-live date of September 30, 2020.

PG&E is also undertaking a Smart Connect initiative that will expedite and streamline interconnections by facilitating closer coordination between PG&E's Service Planning department and EGI.

¹ PG&E's EGI role is to process customer-installed generation interconnection applications from receipt through permission-to-operate.

Additionally, earlier this year, PG&E submitted an advice letter, which was approved by the Commission in Resolution E-5079, to streamline certain resiliency projects by excluding them from the queue – the program is called the Customer Resiliency Support Program (CReSP). As described in PG&E AL 5791-E/E-A, PG&E has developed processes to expedite interconnection of certain generation projects that submit an application this summer. Projects within program scope for queue exemption include:

- Momentary Parallel Operation Applicants of any size; and
- Non-Export Applicants 30 kilowatts (kW) or less

By receiving Commission approval to exempt Momentary Parallel Operation Applicants of any size, and Non-Export Applicants 30 kW or less from the queue assignment requirement, PG&E expects that these project types will experience an overall cycle time reduction of roughly two weeks.

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*****

Any party wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than September 7, 2020, which is 21 days² 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:

² The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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 3 of D. 20-06-017, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, September 16, 2020 which is 30 calendar days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.17-07-007, R.14-07-002 and R.19-09-009. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service List R.17-07-007
Service List R.14-07-002
Service List R.19-09-009



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
PLC = Pipeline

GAS = Gas
HEAT = Heat

WATER = Water

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5917-E

Tier Designation: 2

Subject of AL: Information Regarding Staffing Levels for PG&E's Interconnection Application Process, Pursuant to Decision 20-06-017

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.20-06-017

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: 9/16/20

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:

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	