

January 22, 2021

Advice 4351-G-A/6035-E-A

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Supplemental: Revision to January 1, 2021 – June 30, 2021 Energy Savings Assistance Program Bridge Funding and Retreatment Goals [Pursuant to GO 96-B, Energy Industry Rules, Section 5.2.2]

Purpose

Pursuant to General Order 96-B, Energy Industry Rules, Section 5.2.2,¹ Pacific Gas and Electric Company (PG&E) submitted Advice 4351-G-G/6035-E on December 24, 2020 to revise its authorized January 1, 2021 – June 30, 2021 bridge period Energy Savings Assistance (ESA) Program retreatment goals and budget in response to new performance information due to the COVID-19 pandemic.²

On January 13, 2021 Energy Division requested PG&E clarify its Advice 4351-G-G/6035-E regarding penalties for not meeting the increased interim 25,000 home milestone and sources of bridge funding.

This Supplemental Advice Letter replaces Advice 4351-G/6035-E in its entirety.

Background

Decision (D.) 19-06-022 issued guidance to the investor-owned utilities (IOUs) for California Alternate Rates for Energy (CARE) and ESA program applications for 2021-2026. In anticipation of potential bridge funding, the California Public Utilities Commission (CPUC or Commission) ordered IOUs to submit Tier 1 Advice Letters.³

¹ GO 96-B, Energy Industry Rules, Section 5.2.2 states: “A tariff change that is consistent with authority the Commission previously has granted to the Utility submitting the advice letter, such as a rate change within a price floor and ceiling previously approved by the Commission for that Utility.”

² PG&E’s Advice 4131-G-A/5614-E-A was approved in Energy Division’s Disposition Letter of December 4, 2019, effective as of August 12, 2019.

³ D.19-06-022, pp. 25-26, OP 3.

On August 12, 2019, PG&E submitted Advice 4131-G/5614-E pursuant to D.19-06-022 Ordering Paragraph (OP) 3 to submit a Tier 1 Advice Letter with calculations of the ESA bridge funding amount, source for bridge funds, and retreatment goal for the January 1, 2021 – June 30, 2021 bridge period.

On October 30, 2019, Energy Division requested PG&E propose a retreatment goal in which at least half of the six-month bridge retreatment goal is met by March 31, 2021, while retaining enough budget to treat the remaining homes in the bridge period goal by June 30, 2021.⁴ PG&E submitted Advice 4131-G-A/5614-E-A on November 25, 2019. Energy Division's Disposition Letter of December 4, 2019 authorized PG&E's Advice Letter effective as of August 12, 2019.

Following the authorization of PG&E's Bridge Funding Goals and Budget for the January 1 – June 30, 2020 bridge period, regular ESA program activities were disrupted by the outbreak of the COVID-19 pandemic. The following actions were undertaken to address this evolving situation.

On March 4, 2020, Governor Gavin Newsom (Governor) declared a State of Emergency in response to the outbreak of novel coronavirus, COVID-19.⁵ On March 13, 2020, President Trump signed an Emergency Declaration to facilitate a federal response to the emerging COVID-19 pandemic.⁶ On March 19, 2020, to protect public health, Governor Newsom ordered all individuals living in the State of California to stay at home or at their place of residence to slow the spread of COVID-19. In order to comply with this order, the IOUs temporarily suspended all face-to-face ESA Program activities.

On March 23, 2020, Executive Director Alice Stebbins of the CPUC sent a letter requesting all IOUs offer a 30-day advance payment to ESA Contractors to help maintain the economic stability of the ESA Program's workforce.

On April 7, 2020, Executive Director Stebbins sent a second letter to the IOUs clarifying guidance of the March 23, 2020 letter, and requesting all four large IOUs offer a second 30-day advance payment (total of 60-days) to ESA Contractors to continue efforts to help maintain the economic stability of the ESA Program's workforce.

On May 28, 2020, the Commission adopted Res. E-5074 ratifying elements of Executive Director Stebbins's March 23, 2020 and April 7, 2020 letters. Specifically, Res. E-5074: 1) ratified the 60-day advance payment to ESA Contractors, 2) approved with modification a pay-for-performance mechanism for repayment known as the Post-Pandemic Return to Service (PPRS) credit, 3) approved expedited IOU invoice payments, and 4) required all

⁴ D.19-06-022, pp.12-13.

⁵ Available at <https://www.gov.ca.gov/2020/03/04/governor-newsom-declares-state-of-emergency-to-help-state-prepare-for-broader-spread-of-covid-19/>

⁶ Available at <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-nationalemergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>

IOUs (including Small and Multi-Jurisdictional Utilities) to offer the advance payment to their ESA Contractors.

On June 15, the four large IOUs provided 30-day advance notice to ESA Contractors signifying July 15, 2020 as the start of the six-month PPRS credit-earning period in accordance with OP 7 of Resolution E-5074.

On June 29, 2020, SoCalGas on behalf of the IOUs submitted a Joint Tier 2 Advice Letter (PG&E Advice 4268-G/5864-E) to propose a PPRS percentage in compliance with Resolution E-5074.

On November 11, 2020, the Energy Efficiency Council (EEC) served an ex parte letter to the Commission requesting relief from the authorized January 1, 2021 – June 30, 2021 bridge period ESA budgets and retreatment goals.

PG&E's Authorized January 1, 2021 – June 30, 2021 Bridge Period ESA Budgets and Retreatment Goals

In Advice 4131-G-A/5614-E-A, PG&E proposed to treat 34,500 ESA customer homes during the first half of 2021 following the methodology for calculating bridge funding prescribed by the Commission in D.19-06-022. D.19-06-022 specifies:

The goal number of retreatments IOUs must achieve with bridge funding shall be calculated using the actual average expenditures per retreatment from the first half of 2019 program year, after setting aside 10% of total ESA bridge budget for administrative program costs (commonly referred to as “below the line” costs in monthly and annual reporting template ESA Table 1).

The IOUs are accountable to meet an interim progress milestone, where the IOU must treat at least half of the bridge retreatment goal for the period January 1, 2021-March 31, 2021 and retain enough budget to treat the remaining homes in the bridge period goal by June 30, 2021.⁷

PG&E's forecast included historical experience with the effects of the last six-month bridge period in 2016, during which PG&E experienced a 28% decrease in homes treated because the bridge period created a sense of uncertainty among ESA contractors regarding the future of the program. Based on this prior experience coupled with the uncertainty surrounding what a pending program Decision in the 2021 CARE/ESA Application for Program Years (PY) 2021-2026 would direct for the future ESA Program, PG&E forecasted a similar reduction in the treatment of homes for the 2021 bridge period.

⁷ D.19-06-022, pp.12-13.

D.19-06-022 also specified that IOUs propose a retreatment goal in which at least half of the six-month bridge retreatment goal is met by March 31, 2021 or risk denial of their ALs for funding for the second half of the year.⁸ This is a challenging proposition given that from 2015 through 2019, PG&E experienced a 45 percent/55 percent split in homes treated between the first and second quarters within the first half of the year. This split reflects the average number of homes treated over the last several years of the program. Part of the seasonality of PG&E's homes treated number is a result of the reduced day light hours during the winter as well as post-holiday impact of reduced workforce in January.

Impact of the Coronavirus Crisis on ESA Goals

PG&E treated over 106,000 ESA customer homes in 2019 (well over its authorized 2019 goal) and anticipated similar achievements in 2020. The coronavirus crisis very quickly disrupted normal program procedures, and briefly suspended in-person program activities as PG&E complied with the Governor's State of Emergency orders for Californians to shelter in place to help contain the spread of COVID-19. At the end of May 2020, the Commission adopted Res. E-5074 to provide economic relief to ESA Contractors through 60-day advance payment, a pay-for-performance mechanism for repayment (the PPRS credit, expedited IOU invoice payments, and advance payments to ESA Contractors).

In November 2020, EEC sent a letter to the Commission⁹ outlining contractor concerns, including the reduced 2021 ESA program. As described previously, the bridge period budget was forecasted in accordance with the D.19-06-022 bridge funding methodology, and PG&E factored in experience with the ESA slowdowns engendered during the uncertainty of previous bridge periods in its forecasting. The steep drop in homes treated between 2019 and 2020 is made even sharper considering that 2019 was a wildly successful year during which PG&E was making up for slow 2017 and 2018 ESA ramp up following the previous program Decision (D.16-11-022, modified by D.17-12-009), and the Advice Letter goals were forecasted based on projections that were lower than actual 2019 achievements. However, despite the challenges posed by treating homes during a pandemic, PG&E's contractors are exceeding expectations set by the low fulfillment rate experienced during the previous bridge funding periods.

⁸ D. 19-06-022, OP.5: "Energy Division shall reject the April 15, 2021 Advice Letter if the filing utility fails to demonstrate it 1) has met the interim progress milestone to meet or exceed half of the bridge retreatment goal set forth in the Energy Savings Assistance (ESA) Bridge Calculations Advice Letter in the period January 1, 2021-March 31, 2021; or 2) the fraction of remaining bridge budget for retreatments (after setting aside administrative costs) is less than the fraction of remaining retreatments necessary to meet bridge retreatment goal."

⁹ Letter to the CPUC RE IOU Reduction of ESA Service. A.14.11-007 and A.19-11-003, EEC Notice of Ex Parte (November 11, 2020).

PG&E is sympathetic to the new challenges caused by the pandemic for both its income-qualified customers and the contractors providing ESA services during this unprecedented time. PG&E has met with both its contractors and Energy Division to discuss potential remedies and would like to provide our ESA contractors full opportunity to earn their maximum PPRS credits, which are based on the number of households they treat. For this reason, PG&E proposes to increase the homes treated goal proposed for January 1 – June 30, 2021.

As demonstrated by our experience in 2020, PG&E is confident that our ESA contractors are positioned to meet these increased goals if there are no new unforeseen disruptions caused by COVID-19, such as worsening conditions preventing this kind of work from being executed safely in customers’ homes. Because the COVID-19 pandemic crisis is still evolving with new strains of the virus, and is anticipated to get worse before it gets better, PG&E is taking the risk that together the Company and its ESA Contractors will be able to meet these increased home treatment goals during each of first two quarters of 2021.

D.19-06-022 established an interim progress milestone, requiring the IOUs to meet or exceed half of the bridge retreatment goal set forth in the ESA Bridge Calculations Advice Letter for the period January 1, 2021-March 31, 2021 in order to request and receive funding for a second six month bridge period should one be necessary.¹⁰ As described, meeting this goal may not be possible despite the best efforts of PG&E or the contractors if the pandemic worsens and contractors are not allowed to work in the field, or if customers sheltering-in-place are reluctant to let them into their homes. If contractors need to suspend or curtail activities due to local or state pandemic requirements or customer refusals impact the Q1 goal attainment, PG&E respectfully requests that the Commission consider waiving any penalties for not meeting this increased interim 25,000 home milestone.

Revised January 1, 2021 – June 30, 2021 Bridge Period ESA Home Treatment Goals

PG&E has revised its homes treated goals to 50,000 to help contractors meet PPRS repayment schedules, increasing the six-month bridge period goal by 15,500 (and totaling 100,000 ESA homes in 2021 if the Bridge period extends for the entire year). The original and revised homes treated goals are shown in Table 1. Detail by year is shown in Attachment Tables 1A and 1B.

Table 1

Authorized and Revised Request for Jan. 1 - Jun. 30, 2021 Home Treatment Goals

ESA	Authorized Jan. 1 - Jun. 30, 2021 ^a Households Treated	Revised Jan. 1 - Jun. 30, 2021 Households Treated
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¹⁰ D.19-06-022, OP.5.

Households Treated	Total	Q 1 - 2021	Q 2 - 2021	Total	Q 1 - 2021	Q 2 - 2021
First-Time Treatment ^b	NA	NA	NA	NA	NA	NA
Retreatment	34,500	17,250	17,250	50,000	25,000	25,000
Total Home Treatment	34,500	17,250	17,250	50,000	25,000	25,000

a. Authorized in ED's PG&E Disposition Letter AL 4131-G-A/5614-E-A (December 4, 2019).

b. PG&E successfully accomplished the ESA 2020 programmatic initiative to provide all eligible low-income customers the opportunity to participate in the ESA program and to offer those who wish to participate all cost-effective energy efficiency measures in their residences by 2020. Therefore, PG&E is forecasting all homes treated in 2021 to be retreatments, and is not planning to distinguish between First-Time and Retreated Homes.

Revised January 1, 2021 – June 30, 2021 Bridge Period ESA Budget

PG&E increased its Bridge Period ESA budget to include the additional homes it proposes to treat during the first six months of 2021. D.19-06-022 required IOUs to specify the portion of the budget that will come from unspent funding as opposed to new revenue collections:

The IOUs should include what portion of the total bridge budget can be accommodated from unspent funds, if any, differentiating between Unspent Funds from PYs 2009-2016 and PYs 2017-2020, and what portion of bridge budget will require new revenue collection.¹¹

PG&E will fund the additional 2021 bridge period home treatments from unspent funding. PG&E's revised ESA Budget is shown in Table 2. Electric and gas budget detail by measure is shown in the Attachment Table 2.

Table 2

Jan. 1 – Jun. 30, 2021 Bridge Funding: Authorized Budget and Revised Budget Request

ESA Budget Category	Authorized Bridge Funding Program Year (6 months) ^a						Revised Bridge Funding Program Year (6 months) ^b					
	Projected	Admin % of Total	Projected	Admin % of Total	Projected	Admin % of Total	Projected	Admin % of Total	Projected	Admin % of Total	Projected	Admin % of Total
	Q1 – 2021		Q2 - 2021		Q1 + Q2 2021 Total		Q1 - 2021		Q2 - 2021		Q1 + Q2 2021 Total	
Treatment Budget ^c	\$27,889,250		\$27,889,250		\$55,778,500		\$40,569,000		\$40,569,000		\$81,138,000	
Administrative ^d	\$2,943,881	10%	\$2,943,881	10%	\$5,887,762	10%	\$4,112,410	9%	\$4,112,410	9%	\$8,224,820	9%

¹¹ D.19-06-022, p.13.

Total^e	\$30,833,131	\$30,833,131	\$61,666,262	\$44,681,410	\$44,681,410	\$89,362,820
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- a. Authorized in ED's Disposition Letter for PG&E AL 4131-G-A/5614-E-A (December 4, 2019). Based on D.19-06-022 Methodology.
- b. PG&E's updated budget, following the D.19-06-022 Methodology and including budget for 15,500 additional treated homes and unexpected overhead/safety incremental expenses.
- c. ESA Treatment category includes Appliances, Domestic Hot Water, Enclosure, HVAC, Lighting, Miscellaneous, Customer Enrollment, In-Home Education, Implementation, and Pilot, as shown "above the line" on ESA Annual Report Table 1.
- d. Administrative category includes Training Center, Inspections, Marketing and Outreach, Studies, Regulatory Compliance, General Administration, and CPUC Energy Division, as shown "below the line" on ESA Annual Report Table 1.
- e. PG&E's Bridge Funding Budget is from 2009-2020 uncommitted unspent ESA Program funds. Furthermore, PG&E is authorized to 1) carry-over MF CAM committed budget pursuant to D.19-06-022 into the 2021 Bridge and 2) incur additional expenses for PPRS credit (approximately \$9.2 M) as authorized in Res-E-5074. These budgets are in addition to the Bridge Funding budget requested in this Advice Letter.

Increase in ESA Implementers' Overhead Costs due to COVID-19

Separate from contractual obligations with PG&E, ESA implementers have an independent obligation to adhere to and be in full compliance with all state and local safety standards, which includes providing for the safety of their employees as required by OSHA standards for all employers. Due to the COVID-19 Pandemic, ESA contractors have been incurring an unanticipated increase in overhead costs that did not exist when PG&E originally filed its Bridge Funding Advice Letter in November 2019.¹² To assist ESA implementers with some of their additional overhead costs associated with 2021 COVID-19 safety requirements, PG&E has increased its 2021 ESA Bridge Funding budget. This limited incremental safety overhead assistance is included in the Bridge Funding budget shown in Table 2 and Attachment 2.

Source of Bridge Funding

Energy Division's Disposition Letter regarding PG&E AL 4131-G-A/5614-E-A authorized PG&E's proposal that the 2021 ESA bridge funding be sourced from a mix of Unspent Funds from PYs 2017-2020, including PY2009-2016 unspent funds allocated to PY2017-2020, along with new revenue collection in the following order of priority:

1. Unspent PY2017-2020 funds (including PY2009-2016 unspent funds that were allocated to PG&E's PY2017-2020 ESA Program through Advice Letter requests).¹³
2. New revenue collection.

¹² PG&E submitted Advice 4131-G-A/5614-E-A on November 25, 2019.

¹³ Conforming Advice Letter Final Resolution PGE G-3531 (December 14, 2017) or Mid-Cycle Advice Letter Non-Standard Disposition Letter PGE 3990-G_5329-E_3990-G-A_5329-EA_3990-G-B_5329-E-B (January 4, 2019).

Following the priority list above, PG&E will first spend any remaining unspent PY2017-2020 funds, including PY2009-2016 unspent funds that were allocated to PG&E's PY2017-2020 ESA Program. At this time, PG&E estimates approximately \$197 million gas and electric funds will be unspent by December 31, 2020, and that new revenue collection for the January 1 – June 30, 2021 bridge period will not be required. At this time PG&E anticipates the possibility that it will need to shift funds between electric and gas commodities. PG&E will file an Advice Letter if such a fund shift is required.

PG&E requests to carry over any remaining ESA unspent funds to offset revenue collections for the 2021-2026 ESA Program authorized in the Final Decision, if there are any remaining ESA unspent funds at the conclusion of the 2021 Bridge Funding period (whether that is June 30, 2021, or December 31, 2021 depending on the timing of a Final ESA-CARE Decision).

Committed MF CAM Projects and Funding Carried Over into the 2021 Bridge

In D.19-06-022, the Commission authorized a funding amount up to the 2020 budget levels approved in mid-cycle advice letter dispositions. The Commission established a status quo program, directing the IOUs to continue the previously approved ESA activities and retreat the number of homes the bridge budget will accommodate. D.19-06-022 specifies:

Other ESA activities beyond retreatments that are not completed at the end of 2020 yet still have funds from the current cycle, such as ESA Multi-Family Building Common Area Measures and first-time treatment of the associated tenant units, should continue into PY 2021 but not result in additional budget allocation through bridge funding for the activity.¹⁴

All of PG&E's CAM funds are committed and contracts have been executed. PG&E has completed and paid for 14 CAM projects through December 1, 2020. 199 properties are currently enrolled in the CAM pipeline, committing all of PG&E's remaining CAM incentive funds (totaling approximately \$25 million). Implementation of these projects will continue during the 2021 Bridge period. Additionally, CAM is currently enrolling interested stakeholders into a 2021 waitlist and will enroll these properties should committed funds become available. These MF CAM activities and budgets are in addition to the Bridge Funding budget requested in this Advice Letter, pursuant to the directives of D.19-06-022.

¹⁴ D.19-06-022, p.13.

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*****

In Advice 4351-G/6035-E, PG&E requested the protest period be waived. Pursuant to General Order 96-B, Section 7.4 and Section 7.5.1, the protest period may be waived for a Supplemental submission and PG&E should not have asked for it to be waived for its original submission. PG&E removes the request to waive the protest period from Advice 4351-G/6035-E, but respectfully requests it be waived from this Supplemental submission.

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

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, (and D.19-06-022), this advice letter is submitted with a Tier 2 designation. In its original Advice Letter submittal, PG&E requested that this Tier 2 advice submittal become effective on regular notice, January 23, 2021 which is 30 calendar days after the date of submittal. However, pursuant to OP 3 of D. 19-06-022, PG&E meant to request that this Tier 2 advice letter become effective upon date of Advice 4351-G/6035-E submittal, which was December 24, 2020, and herein requests an effective date of December 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 A.19-11-003, et al.. 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

Attachment

cc: Service Lists A.14-11-007, et al. and A.19-11-003, et al.



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 U 39 M)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@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) #: 4351-G-A/6035-E-A

Tier Designation: 2

Subject of AL: Supplemental: Revision to January 1, 2021 – June 30, 2021 Energy Savings Assistance Program Bridge Funding and Retreatment Goals [Pursuant to GO 96-B, Energy Industry Rules, Section 5.2.2]

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-06-022

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: N/A

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: 12/24/20

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: 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

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

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

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Cenergy Power
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP Energy
Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie

Green Power Institute
Hanna & Morton
ICF

IGS Energy
International Power Technology
Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

Office of Ratepayer Advocates
OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy