

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6051E
As of May 21, 2021

Subject: Update to Pacific Gas and Electric Company's Bundled Procurement Plan - Electric Portfolio Hedging Plan (Appendix E)

Division Assigned: Energy

Date Filed: 01-08-2021

Date to Calendar: 01-13-2021

Authorizing Documents: None

Disposition:	Signed
Effective Date:	05-20-2021

Resolution Required: Yes

Resolution Number: E-5146

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

January 8, 2021

Advice 6051-E

(Pacific Gas and Electric Company – U 39 E)

Public Utilities Commission of the State of California

Subject: Update to Pacific Gas and Electric Company’s Bundled Procurement Plan - Electric Portfolio Hedging Plan (Appendix E)

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits this advice letter to the California Public Utilities Commission (Commission or CPUC) seeking approval to update Appendix E - Electric Portfolio Hedging Plan (Hedging Plan) of its Bundled Procurement Plan (BPP) adopted in Commission Decision (D.) 15-10-031, as modified.¹ As described below and in Confidential Attachments to this advice letter, PG&E’s requests updates to modify certain targets, timelines and details of its current Hedging Plan to offer protection against commodity price risk while acknowledging uncertainty regarding PG&E’s future bundled electric portfolio.

Background

The CPUC approved PG&E’s proposed 2014 BPP, including Appendix E, Electric Portfolio Hedging Plan, with modifications, in D.15-10-031, as modified by D.16-01-015. PG&E has since filed five advice letters² notifying Energy Division of the status of PG&E’s Bundled Electric energy portfolio and PG&E’s actions according to its Hedging Plan. In Advice Letter 5704-E, effective December 2, 2019, PG&E stated that it would submit an advice letter to either continue or update its Hedging Plan, as needed to account for pertinent portfolio, market, and regulatory conditions. Accordingly, this Advice Letter

¹ In D.15-10-031, the Commission adopted PG&E’s proposed 2014 BPP with modifications and required PG&E to conform the BPP to incorporate modifications made in D.15-10-031 no later than 90 days after the effective date of D.15-10-031. PG&E filed its conformed BPP on December 10, 2015, via Advice 4750-E, and the Energy Division issued a disposition letter approving Advice 4750-E on June 15, 2016.

² Advice Letters 5282-E, effective May 1, 2018, 5469-E, effective January 16, 2019, 5507-E, effective April 1, 2019, 5704-E, effective December 9, 2019, and 6024-E, filed December 11, 2020, each describe the then-current status of PG&E’s electric portfolio and temporary management according to section D.2. of PG&E’s Hedging Plan.

updates PG&E's Hedging Plan to effectively manage the bundled electric portfolio and associated financial risks. PG&E's Advice Letter 6024-E, filed December 11, 2020, provides a transition between its currently authorized Hedging Plan and the updates proposed herein.

Revised Hedging Plan

PG&E's proposed updates to its Hedging Plan are designed to allow PG&E to manage commodity price risk for customers given current conditions and future portfolio uncertainties. PG&E's future resource portfolio is expected to undergo significant change in the coming years, with the retirement of Diablo Canyon and the end of numerous tolling purchased power agreements. Future resource procurement is envisioned but unknown at this time, creating uncertainty with respect to the future composition of PG&E's supply portfolio. Potential changes in PG&E's bundled electric load could significantly alter its hedged position. Additionally, PG&E's recent emergence from bankruptcy and its non-investment grade credit rating impact the collateral requirements needed to engage in energy procurement, including hedging transactions. To continue a financial hedging program, PG&E requests approval of an updated Appendix E (Electric Portfolio Hedging Plan) to PG&E's 2014 BPP, as described in Confidential Attachment 3 to this Advice Letter. Updated Appendix E clarifies that certain components of the Hedging Plan may be updated via a Tier 2 Advice Letter, per Section VII of the BPP³. Confidential Attachment 5 provides a description of the proposed Hedging Plan modifications and how they are consistent with the Commission's directives.

PG&E notes that, consistent with the Advice Letter submitted in connection with the Power Charge Indifference Adjustment (PCIA) Order Instituting Rulemaking Phase 1 Decision,⁴ any utility hedging costs and benefits would be recorded in the Energy Resource Recovery Account balancing account for allocation only to bundled electric customers. Community Choice Aggregators and other departed load customers will not share in any costs or benefits of any future hedging transactions.

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

Attachments

- Attachment 1: Declaration of Michael Kowalewski Seeking Confidential Treatment of Certain Data and Information in Advice 6051-E (including "IOU Matrix")
- Attachment 2: Revised Appendix E - Electric Portfolio Hedging Plan [Public Version]

³ 2014 BPP, Sheet 36, "Updates to the Bundled Procurement Plan Via Advice Letter."

⁴ AL 5440-E.

- Attachment 3: Revised Appendix E - Electric Portfolio Hedging Plan [Confidential Version]
- Attachment 4: Revised Appendix E - Electric Portfolio Hedging Plan [Confidential Version – Redlines from Current Hedging Plan]
- Attachment 5: Rationale and Supporting Documentation for Revised Hedging Plan [Confidential]

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*****

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than January 28, 2021, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 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

PG&E requests that this Tier 3 advice submittal become effective upon Commission approval, but no later than May 31, 2021.

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.20-05-003. 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 R. 20-05-003

Limited Access to Confidential Material:

The portions of this advice letter marked Confidential Protected Material are submitted under the confidentiality protection of Section 454.5(g) of the Public Utilities Code. This material is protected from public disclosure because it consists of, among other items, detailed descriptions of the Electric Portfolio Hedging Plan, which are protected pursuant to D.06-06-066 and D.08-04-023.

Public Attachments Submitted with the Advice Letter:

- Attachment 1: Declaration of Michael Kowalewski Seeking Confidential Treatment of Certain Data and Information in Advice 6051-E (including "IOU Matrix")
- Attachment 2: Revised Appendix E - Electric Portfolio Hedging Plan [Public Version]

Confidential Attachments Submitted with the Advice Letter:

- Attachment 3: Revised Appendix E - Electric Portfolio Hedging Plan [Confidential Version]
- Attachment 4: Revised Appendix E - Electric Portfolio Hedging Plan [Confidential Version – Redlines from Current Hedging Plan]
- Attachment 5: Rationale and Supporting Documentation for Revised Hedging Plan [Confidential]



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 6051-E

Tier Designation: 3

Subject of AL: Update to Pacific Gas and Electric Company's Bundled Procurement Plan - Electric Portfolio Hedging Plan (Appendix E)

Keywords (choose from CPUC listing): Compliance, Portfolio, Procurement

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information: See Attachment 1

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: Michael Kowalewski, (415)972-5589, MSK4@pge.com

Resolution required? Yes No

Requested effective date:

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: 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:

PACIFIC GAS AND ELECTRIC COMPANY

Attachment 1

**Declaration of Michael Kowalewski Seeking
Confidential Treatment of Certain Data and
Information in Advice 6051-E
(including “IOU Matrix”)**

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**DECLARATION OF MICHAEL KOWALEWSKI
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION
CONTAINED IN PG&E'S ADVICE LETTER 6051-E**

I, Michael Kowalewski, declare:

1. I am presently employed by Pacific Gas and Electric Company (PG&E) and have been an employee since 1992. My current title is Portfolio Manager in the Energy Policy and Procurement Department. In this position, my responsibilities include financial portfolio management and trading. In carrying out these responsibilities, I have acquired knowledge of gas and electric supply, the markets for physical and financial products for hedging, and the various types of transactions involved.

2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066 (affirmed in 16-08-024), 08-04-023, 14-10-033, and relevant Commission rules, I make this declaration seeking confidential treatment for Advice Letter 6051-E which provides an information-only update on the current status of PG&E's bundled electric energy portfolio and actions consistent with PG&E's Conformed Bundled Procurement Plan.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes data and information covered by Public Utilities Code Section 454.5(g), which would reveal market sensitive information. The matrix also specifies why confidential protection is justified. Finally, the matrix specifies that: (1) the information is not already public; and (2) the data cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on January 8, 2021 at Oakland, California.

/s/

MICHAEL KOWALEWSKI

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
ADVICE LETTER 6051-E
Submitted on January 8, 2021

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To	Justification for Confidential Treatment	Length of Time Data To Be Kept Confidential
Advice 6051-E, Attachment 3	D.06-06-066, Appendix 1 (Item I.A.4 – Long Term Fuel (Gas) Buying and Hedging Plans) Pub. Util., Code § 454.5(g)	Information concerning a description of PG&E’s long term buying and hedging strategies, which constitutes market sensitive information that could cause harm to PG&E’s customers and put PG&E at an unfair business advantage if publicly disclosed.	Indefinite
Advice 6051-E, Attachment 4	D.06-06-066, Appendix 1 (Item I.A.4 – Long Term Fuel (Gas) Buying and Hedging Plans) Pub. Util., Code § 454.5(g)	Information concerning a description of PG&E’s long term buying and hedging strategies, which constitutes market sensitive information that could cause harm to PG&E’s customers and put PG&E at an unfair business advantage if publicly disclosed.	Indefinite
Advice 6051-E, Attachment 5	D.06-06-066, Appendix 1 (Item I.A.4 – Long Term Fuel (Gas) Buying and Hedging Plans) Pub. Util., Code § 454.5(g)	Information concerning a description of PG&E’s long term buying and hedging strategies, which constitutes market sensitive information that could cause harm to PG&E’s customers and put PG&E at an unfair business advantage if publicly disclosed.	Indefinite

PACIFIC GAS AND ELECTRIC COMPANY

Attachment 2

**Revised Appendix E –
Electric Portfolio Hedging Plan**

(Public Version)



Pacific Gas and Electric Company
San Francisco, California

Cal. P.U.C. Sheet No.
Pacific Gas and Electric Company
2014 Bundled Procurement Plan

APPENDIX E
ELECTRIC PORTFOLIO HEDGING PLAN

CONFIDENTIAL

Decision No. 15-10-031

Issued by
Robert Kenney
Vice President
Regulatory and External Affairs

Date Filed December 10, 2015
Effective _____
Resolution No. _____



A. Introduction

This Appendix describes Pacific Gas and Electric Company's ("PG&E") hedging plan ("Hedging Plan") for its electric portfolio. The Hedging Plan guides PG&E's management of the commodity price risk in the portfolio. In addition, the Hedging Plan serves as a framework for California Public Utilities Commission ("CPUC" or "Commission") compliance review through the quarterly compliance reports and annual Energy Resource Recovery Account ("ERRA") proceedings.

B. Hedging Plan Structure

The Hedging Plan includes the following components described below in Section D, E and F:

- Plan tenor;
- Hedging targets and limits;
- Product mix strategy;
- Execution strategy;
- Liquidity management strategy; and
- Conditions when it is acceptable to operate outside the hedging plan.

C. Physical Supply Risks and Financial Risks are Managed

PG&E's objectives for managing the electric portfolio's exposure to physical risks are different from PG&E's objectives for managing the electric portfolio's exposure to financial risks. Therefore, PG&E manages the electric portfolio's physical supply separately from the electric portfolio's exposure to financial risks. In managing the electric portfolio's financial risks, PG&E's objectives are to reduce exposure of the



electric portfolio to commodity price volatility and stabilize electric rates for customers, including evaluating risks for the bundled electric portfolio using To-expiration Value at Risk (“TeVaR”).

To manage aspects of the electric portfolio other than financial risks—aspects such as operational flexibility—PG&E procures physical electricity products, physical natural gas products, and greenhouse gas (“GHG”) compliance instruments. Such transactions may affect the physical positions and financial positions of the electric portfolio. Various physical supply risks are not managed through the Hedging Plan but through other parts of the Bundled Procurement Plan (“BPP”). The BPP addresses management of all supplies needed to manage procurement for PG&E’s bundled electric customers.

For example, risk management associated with differences in electricity prices between day-ahead and real-time prices are described in Appendix H, PG&E’s plan for convergence bidding. Managing congestion risk is described in Appendix I, PG&E’s plan for using Congestion Revenue Rights (“CRR”) and participating in the California Independent System Operator’s allocation and auction processes for CRRs. Appendices A and B describe products and processes, including those available for managing PG&E’s physical supply risks. The Hedging Plan addresses commodity price risks for the electric portfolio.



D. Hedging Plan

1. Tenor

[Redacted text block]

In the context of the Hedging Plan, tenor means the length of the delivery period to be hedged. [Redacted text]

[Redacted text block]

- 1 [Redacted text]
- 2 [Redacted text]



FIGURE E-1
PACIFIC GAS AND ELECTRIC COMPANY



[Redacted text block]

2. Hedging Targets and Limits

[Redacted text block]



[Redacted table content]

**TABLE E-1
PACIFIC GAS AND ELECTRIC COMPANY
ELECTRIC PORTFOLIO HEDGING TARGETS FOR COMMODITY HEDGING**

[Redacted table content]

[Redacted table content]

3 [Redacted table content]

4 [Redacted table content]

5 [Redacted table content]



[REDACTED]

**TABLE E-2
PACIFIC GAS AND ELECTRIC COMPANY
ELECTRIC PORTFOLIO HEDGING LIMITS FOR COMMODITY HEDGING**

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

6 [REDACTED]

7 [REDACTED]



[Redacted text block containing multiple paragraphs of blacked-out content]

8

9

10

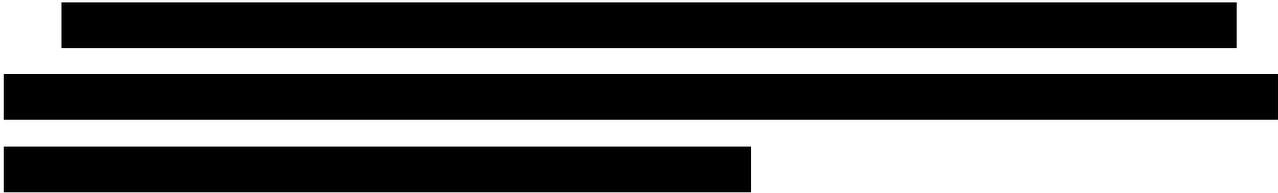
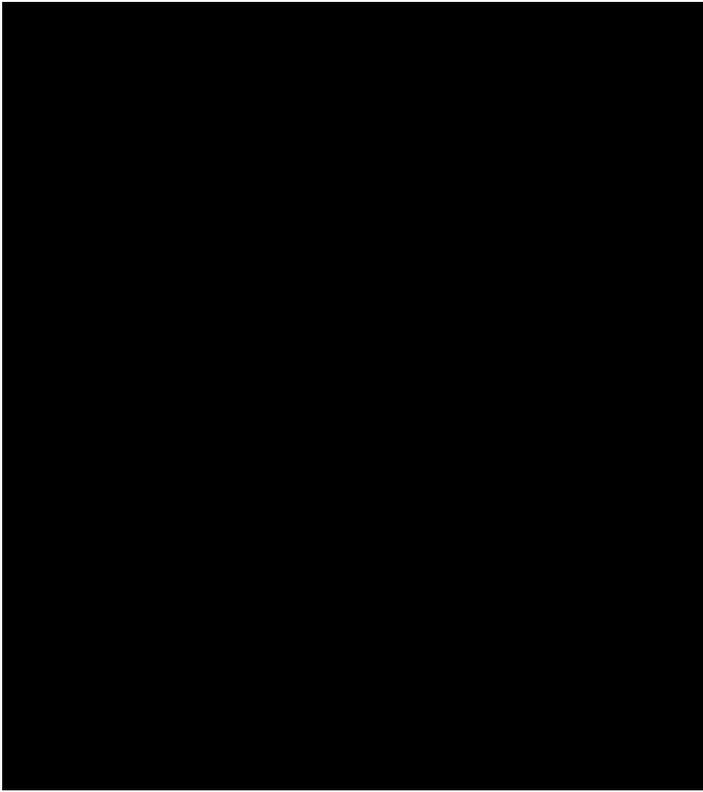


FIGURE E-2
PACIFIC GAS AND ELECTRIC COMPANY





3. Product Mix

[Redacted]

[Redacted]

[Redacted]

a. Product Mix Targets

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

**TABLE E-3
PACIFIC GAS AND ELECTRIC COMPANY**

[Redacted]

[Redacted]

11 [Redacted]

12 [Redacted]



[Redacted text block containing multiple paragraphs of blacked-out content]

¹³ BPP Appendix A, Procurement Products.

¹⁴ [Redacted text block]



[Redacted text block containing multiple paragraphs of blacked-out content]



4. Execution Strategy

[Redacted text block containing the execution strategy content]



[Redacted text block]

E. Liquidity Management Strategy

[Redacted text block]

1. Liquidity Management Structure

[Redacted text block]

[Redacted text block]

[Redacted text block]



[Redacted]

[Redacted]

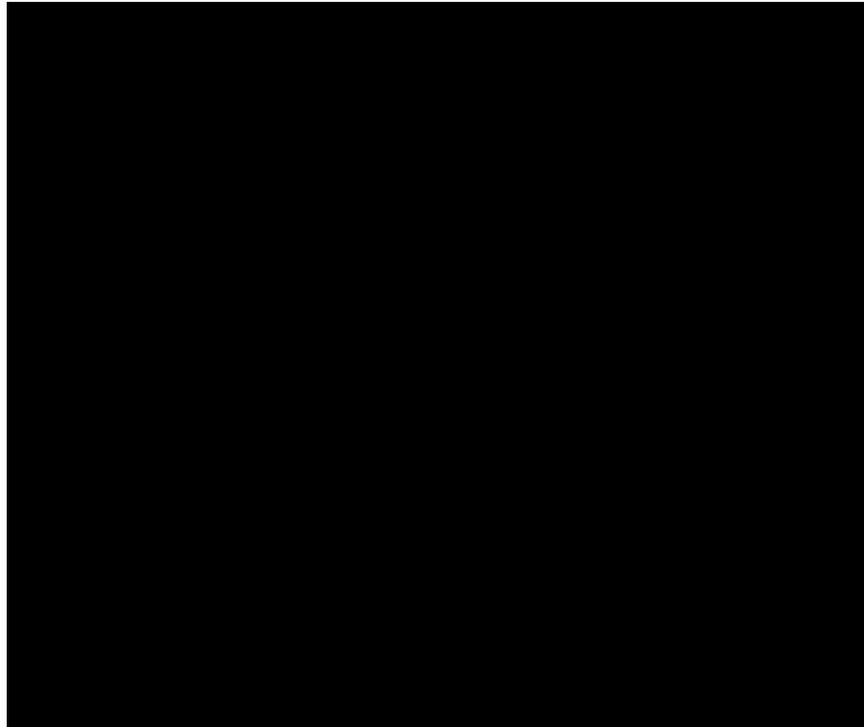
[Redacted]

16 [Redacted]

17 [Redacted]



**FIGURE E-3
PACIFIC GAS AND ELECTRIC COMPANY
LIQUIDITY MANAGEMENT STRUCTURE**



[Redacted text]



2. Liquidity Measurement and Reporting

[REDACTED]

[REDACTED]

[REDACTED]

TABLE E-4
PACIFIC GAS AND ELECTRIC COMPANY
LIQUIDITY MANAGEMENT STRUCTURE

[REDACTED]

3. Liquidity Mitigation Strategies

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



F. Operating Outside of the Hedging Plan

1. Transition Plan

[Redacted text block]

2. Unusual Events, Market Dislocations, and Emergencies

[Redacted text block]

18 [Redacted text block]



[Redacted content]

PACIFIC GAS AND ELECTRIC COMPANY

Attachment 3

**Revised Appendix E –
Electric Portfolio Hedging Plan**

(Confidential Version)

PACIFIC GAS AND ELECTRIC COMPANY

Attachment 4

**Revised Appendix E –
Electric Portfolio Hedging Plan**

**(Confidential Version–
Redlines from Current Hedging Plan)**

PACIFIC GAS AND ELECTRIC COMPANY

Attachment 5

**Rationale and Supporting Documentation for
Revised Hedging Plan**

(Confidential)

**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