

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4435G/6197E
As of July 1, 2021

Subject: PG&E's Self-Generation Incentive Program (SGIP) Budget Information per Administrative Law Judge's (ALJ) Ruling dated April 16, 2021

Division Assigned: Energy

Date Filed: 05-19-2021

Date to Calendar: 05-21-2021

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	05-19-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Stuart Rubio

(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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

May 19, 2021

Advice 4435-G/6197-E

(Pacific Gas and Electric Company U 39 M)

Public Utilities Commission of the State of California

Subject: PG&E's Self-Generation Incentive Program (SGIP) Budget Information per Administrative Law Judge's (ALJ) Ruling dated April 16, 2021.

Purpose

Pacific Gas and Electric Company (PG&E) responds to the California Public Utilities Commission (CPUC) "*Administrative Law Judge's Ruling Providing Proposal, Requesting Comment, and Updating Procedural Schedule,*" (the Ruling) dated April 16, 2021, in which Ordering Paragraph (OP) 2 states "The SGIP Program Administrators shall file and serve the SGIP budget information requested in this ruling no later than May 19, 2021." The Ruling is primarily focused on providing a Heat Pump Water Heater (HPWH) Staff Proposal for comment by parties to the Rulemaking (R.) 20-05-012 proceeding.¹

The Ruling also addresses key accounting and reporting questions around SGIP Program Administrator (PA) budgets. The Ruling notes that Decision (D.) 09-12-047 required that SGIP PAs provide a monthly report about budgetary categories including:

1. Authorized budget
2. Total spent and reserved
 - a. Administration and measurement and evaluation
 - b. California Solar Incentive rollover
 - c. Any other rollovers
3. Pending reservations
4. Authorized carryover
5. Actual cash flows
 - a. Total ratepayer collections
 - b. Actual expenditures
 - c. Pending reservations
 - d. Collected carryover

¹ The Ruling includes the attachment "SGIP HPWH Staff Proposal," by CPUC Energy Division Staff, dated April 19, 2021.

- e. Total interest
- f. Forfeited application fees
- g. Budget years in account

The Ruling states that the CPUC has not terminated or suspended the monthly program budget reporting requirement in D.09-12-047 and that the “Program Level Budget Summary” available on the SGIP statewide selfgenca.com website “does not contain all of the budget categories included in Appendix A to D.09-12-047.”²

The CPUC states that it is “not sure of the cause of this discrepancy”³ which is understandable as the discrepancy does not seem to be related to a single item but rather how the selfgenca.com website and database have been implemented in the years since D.09-12-047. PG&E notes that the reporting on the SGIP website had changed to the current format in 2017; however, it is not clear that the prior structure would have identified the differences that the CPUC asks about in this Ruling.

As Southern California Edison Company (SCE) commented in their January 31, 2020 filing in response to the order in D.19-09-027, the PAs conferred with Energy Division (ED) that the format required in D.09-12-147 is not conducive to the way that the budget is allocated.⁴ PG&E’s and the other PAs’ January 31, 2020 filings were approved and they are accurate based on the understanding that the information was derived from the statewide database.

PG&E appreciates the desire of the CPUC to view additional accounting elements; this is in-line with PG&E’s request in Advice Letter (AL) 4360-G/6052-E to leverage unallocated (i.e., unencumbered) funds projected to be in the PG&E SGIP Memorandum Account (SGPMA) by 2024 for the PG&E-proposed On-Bill Financing Pilot⁵. Funds in the SGPMA are only able to be used for SGIP approved uses and should be leveraged or returned to ratepayers.

The attached Table 1 provides the information on the funding categories that are tracked by PG&E and shows how the projected funds from AL 4360-G/6052-E were estimated.

² Ruling, pg. 5

³ Ruling, pg. 6

⁴ “In its decision, the Commission directed each of the SGIP PAs to submit a Tier 1 advice letter containing their final SGIP accounting data as of December 31, 2019 using the format directed in D.09-12-047, Appendix A; *however, the PAs conferred with Energy Division (ED) that the format required in D.09-12-047 is not conducive to the way the budget is currently allocated. Table 1, attached, shows SCE’s accumulated unused SGIP incentive and administrative funds for use during the 2020-2024 period, reflecting the current format.*” (emphasis added). SCE Advice 4154-E (U 338-E), “Self-Generation Incentive Program Accounting Data as of December 31, 2019 Pursuant to Decision 19-09-027”.

⁵ AL 4360-G/6052-E is pending approval as of May 19th, 2021.

Background

According to the Ruling:

“Each SGIP Program Administrators shall by no later than May 19, 2021, file an updated summary of SGIP budgets, including the budget categories included in their January 31, 2020 Tier 1 advice letters and all additional categories they are tracking, including but not limited to “forfeited application fees,” “total interest,” and “revenue collections.” If the SGIP Program Administrator is unsure of which technology budget category in which to place certain available funds, the Program Administrator shall identify those funds in an unallocated budget line. Each SGIP Program Administrator shall provide a full and precise summary of the disposition of all accumulated unused funds resulting from authorized SGIP ratepayer collections, including forfeited application fees, revenue collections, and interest earned on those funds. Additionally, PG&E shall propose its preferences in the event that its Advice Letter proposing an On Bill Finance loan program for schools is not authorized (see also question 2.c below).” (pg. 6)

In the Ruling, PAs are asked to report on all additional categories they are tracking; total interest and forfeited application fees are called out. To address this request PG&E provides detail on the data elements included in the SGIP statewide database (selfgenca.com) and the PG&E SGPMA. PG&E then further elaborates on how PG&E estimated unallocated (unencumbered) funds that will exist in the SGPMA at the end of the current program cycle. PG&E appreciates the CPUC addressing the gap in the guidance around this topic including how best to use unallocated funds.

There are two sources of data which PG&E uses to calculate its unallocated funds: 1) the public facing selfgenca.com website and 2) PG&E’s SGPMA. The selfgenca.com website includes the approved budget information through 2024; it reports as if all such funds approved through 2024 have already been collected by the utilities, which is obviously over-stating what the utilities have collected today. PG&E’s SGPMA is recorded monthly (based on 1/12 of the annual budget amount) and includes all program funding and expenditures that PG&E is tracking in ‘real-time’ including administration, measurement and evaluation (M&E), marketing, incentive expenditures, interest, benefits burden and forfeited application fees (which are added to incentive budgets). The SGPMA does not record what shows as pending, reserved or PBI in process in the database; it only records actual expenditures. The data sources – the selfgenca.com site and the PG&E SGPMA – are related but will not agree because, as mentioned, the selfgenca.com website lists all approved collections and the SGPMA is an active balancing account with dynamic credits and debits.

In sum, PG&E has utilized the SGPMA to track the authorized funding for the SGIP program budget categories against the actual spend since program inception in 2000. The current budget available on the selfgenca.com website includes rollover from previous years and the full amount of the 2020-2024 authorized program budgets even

though PG&E will not fully collect the funds from ratepayers until 2024. The balances will differ due to timing differences in collection and spend as well as interest earned and added forfeited application fees.

The accounting for the SGPMA is detailed in PG&E's Electric and Gas Preliminary Statements.⁶ The balance in the SGPMA is increased (credit entry's increase the amount in the SGPMA) by:

- the authorized SGIP Revenue Requirement (plus the Benefits Burden authorized)
- any forfeited SGIP application fees
- any transfers authorized by the CPUC into the SGPMA and the
- interest earned on the average balance in the SGPMA (if there are accumulated funds)

The balance in the SGPMA is decreased (debited) by:

- incentive payments to customers
- allowable administrator costs
- transfers authorized by the CPUC out of the SGPMA
- interest earned on the average balance in the SGPMA (if there is a deficit of funds).

Statewide Database/ SGIP Website

The statewide database is the system of record for the statewide SGIP program. The website is jointly administered by the statewide PA's and the Energy Division. The database reflects all transactions for the program back to when the program originated in 2000. Accounting transactions in the database are recorded consistently by the PA's based on regulatory guidance.

In January 2010, PG&E filed AL 3086-G/3607-E⁷ which included the final accounting data as of December 31, 2009 in compliance with D.09-012-047. This data included the Authorized Budgets, Spending, Reallocations and Total Authorized Carryover, a portion of which was uncollected. The net uncollected funds, offset by interest accrued and forfeited application fees through 2009, were collected in 2012.

⁶ The accounting for the SGPMA is documented in the SGIP Preliminary Statement. For more information, see PG&E Preliminary Statement Part BY for Electric and Part AW for Gas.

https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_PRELIM_BY.pdf

https://www.pge.com/tariffs/assets/pdf/tariffbook/GAS_PRELIM_AW.pdf

⁷ https://www.pge.com/rates/tariffs/tm2/pdf/GAS_3086-G.pdf

In April 2017 the CPUC issued D.17-04-017⁸ which doubled the SGIP program budget in accordance with AB 1637 and provided specific guidance on how the budget would be allocated. This increased PG&E's collections per year to \$72 million starting in 2017 through 2019. PG&E and the other PAs worked with Energy Division and Energy Solutions (the administrator of the statewide database) to establish the opening budgets—which included attrition and held-back funds from 2016. The amounts of these opening budgets were recorded as Authorized Collections in the database.

In 2019 the CPUC issued D.19-09-027 which established the Equity Resiliency Budget, and approved the carryover of any remainder as of January 1, 2020 of the approximately \$400.7 million in accumulated unused SGIP incentive funds and \$70.3 million in accumulated unused SGIP administrative funds for use during the 2020-2024 period. The Decision directed the PAs to each submit their final SGIP accounting data as of December 31, 2019 using the format directed in D.09-12-047. Yet as referenced above, SCE noted in their budget Advice Letter “the PA’s conferred with Energy Division (ED) that the format required in D.09-12-047 is not conducive to the way that the budget is currently allocated.”⁹

There will be differences between the SGPMA and the public facing selfgenca.com budget totals, as suggested above due to timing of collections and spend and estimates used. Ultimately, as seen in Table 1, PG&E today has estimated the balance of \$31,678,859 of Unallocated Funds, with \$17,900,163 of that being interest. The approach that PG&E is using to calculate the estimated Unallocated Funds is consistent with the approach that PG&E used in AL 4360-G/6052-E¹⁰ and PG&E notes that the Available Funds amount is consistent with prior estimates.

Table 1 includes the amounts in the selfgenca.com database and the SGPMA as of 3/31/2021 (end of Q1 2021) to estimate unallocated funds. The following chart, below, explains the different budget categories in Table 1.

Budget Category	Explanation
2017 – 2024 Ratepayer Collections (rollover from 2016 + SB700)	This column represents ‘Authorized Collections’ on the PA Budget Details report. In addition, PG&E has added the HPWH Budget – which is not yet included in the SW database.
Unallocated Forfeited Application Fees (FAFs)	The FAFs in this table were allocated to the appropriate budget category by PG&E on 4/11/2021. PG&E shows them here since they were allocated after 3/31/2021, the date of this budget report. As new FAFs arise they will continue to be allocated to the appropriate budget.

⁸ <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M183/K843/183843620.PDF>

⁹ SCE Advice 4154-E (U 338-E), “Self-Generation Incentive Program Accounting Data as of December 31, 2019 Pursuant to Decision 19-09-027”.

¹⁰ [AL 4360-G/6052-E](#)

Reallocations	Funds that have been reappropriated per CPUC order to different budget categories.
Authorized Budget	Authorized Budget is the sum of the first three columns. The amount agrees with the 'Authorized Budget' on the statewide database, except that the HPWH budget has been added.
Total Spent and Reserved	The sum of the Payments, Reservations and Performance Based Incentive (PBI) Payments in Process. This ties to columns N-P in Table 1.
Pending Reservations	Funds with reservations pending that will become Reserved or Cancelled, thus effecting the Allocated Funds column.
Allocated Funds	The sum of Total Spent and Reserved and Pending Reservations.
Available Funds	The net of Authorized Budgets minus Allocated Funds. This amount represents funds that have been allocated to budget categories and is still available for authorized projects.
Funds in SGPMA as of 3/31/2021	This is the balance in the PG&E ledger for the SGPMA as of 3/31/2021. (cell D23)
Authorized Collections	These amounts are authorized collections (not including benefit burden) as of 3/31/2021 for the remainder of 2021 and all of 2022, 2023 and 2024. (\$72 million per year; \$54 million for remaining 2021)
Funding Available	This is the estimated amount of funding that will have been collected and available in the SGPMA as of 12/31/2024. The amount is estimated based on the funds in the SGPMA plus the Authorized Collections. PG&E does not estimate other amounts including additions from FAFs and interest.
Funding Needs	This is the estimated amount of funding that is needed to support authorized budgets (cell D16). The amount is estimated as the net of the Authorized Budget minus Payments that have already been made.
Unallocated Funds	This amount is an estimate of the funds that will be in the SGPMA at the end of the program cycle; the net of the Funding Available (D28) and the Funding Needs (D16). Unallocated Funds could be used for authorized purposes - such as the OBF Pilot if authorized or to fund a waitlist in a particular budget - or to return to ratepayers January 1, 2026.
Accrued Interest	This amount is the accumulated interest that is contained in the 3/31/2021 SGPMPA balance since 1/1/2010 (prior amounts were offset against collections). This amount is included in the balance in the SGPMA as of 3/31/2021.

Lastly, the Ruling states, “PG&E shall propose its preferences in the event that its Advice Letter proposing an On Bill Finance loan program for schools is not authorized (see also question 2.c below)”. The funds in the SGPMA can be utilized for SGIP authorized uses, which could include returning the funds to ratepayers, allocating the funds to waitlists in additional budget categories or new authorized uses. PG&E believes that the OBF for Schools Resiliency Pilot is the best use of these funds as we previously suggested. PG&E has received a lot of interest from schools, developers and other stakeholders about the Pilot and believes that it will not only support SGIP program goals including the immediate resiliency needs of schools, but will also provide learning for the SGIP and Clean Energy Financing Options (CEFO) OIR (R.20-08-022)¹¹.

Should the CPUC not approve the PG&E-proposed On-Bill Financing Pilot and direct it to appropriate the funds in another way, PG&E would prefer most or all of it be applied to the Equity Resiliency Budget (ERB) waitlist. This budget category and related classification of customers subjected to 2+ Public Safety Power Shutdowns (PSPS) and/or who live in High Fire Threat Districts (HFTDs) has been designated as the primary focus of the program. Therefore, it is logical that unallocated funds be allocated to the program’s primary focus. That bolsters PG&E’s ultimate goals of improving resiliency for our customers.

Protests

*****Due to the COVID-19 pandemic, 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 **June 8, 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.

¹¹ ‘Pilot Objectives’ PG&E AL 4360-G/6052-E page 5.

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:

Sidney Dietz
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 1** advice submittal become effective upon date of submittal, which is **May 19, 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.20-05-012**. 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/

Sidney Dietz
Director, Regulatory Relations

cc: Service List R.20-05-012



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 (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) #: 4435-G/6197-E

Tier Designation: 1

Subject of AL: PG&E's Self-Generation Incentive Program (SGIP) Budget Information per Administrative Law Judge's (ALJ) Ruling dated April 16, 2021

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 #:

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: 5/19/21

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: Sidney Dietz, 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:

Attachment 1

Table 1

As of 3/31/21; Source: Self Gen CA Site

[a]

[b]

	2017 - 2024 Ratepayer Collections (roll-over from 2016 + SB)	Unallocated Forfeited App Fees*	Reallocation	Authorized Budget	Total Spent and Reserved**	Pending Reservations	Allocated Funds	Available Funds		Pending Res	Reserved	PBI in Process	Paid
Large-Scale Storage	\$201,844,162	(\$67,832,114)		\$134,012,048	\$76,748,050	\$44,085,742	\$120,833,791	\$13,178,257		\$44,085,742	\$56,660,553	\$7,243,030	\$12,844,466
Small Residential Storage	\$49,444,616		\$1,321,442	\$50,766,058	\$35,221,356	\$2,225,977	\$37,447,332	\$13,318,726		\$2,225,977	\$11,491,321		\$23,730,035
Residential Storage Equity	\$10,800,000		\$9,679,392	\$20,479,392	\$4,089,046	\$16,107,096	\$20,196,141	\$283,251		\$16,107,096	\$4,089,046		
Non-residential Storage Equity			\$57,814,534	\$57,814,534	\$24,084,731	\$32,999,147	\$57,083,878	\$730,656		\$32,999,147	\$24,084,731		
Equity Resiliency	\$226,800,000		\$48,236,264	\$275,036,264	\$191,049,172	\$83,957,752	\$275,006,923	\$29,341		\$83,957,752	\$178,716,843		\$12,332,328
San Joaquin Valley Residential			\$4,880,000	\$4,880,000	\$1,214,400	\$554,400	\$1,768,800	\$3,111,200		\$554,400	\$1,214,400		
San Joaquin Valley Non-Residential			\$120,000	\$120,000	\$0	\$0	\$0	\$120,000					
Generation	\$93,170,926	(\$17,309,867)		\$55,861,059	\$12,763,062	\$2,399,040	\$15,162,102	\$40,698,957		\$2,399,040	\$9,199,500	\$1,069,286	\$2,494,276
Heat Pump Water Heater	\$19,654,800			\$19,654,800	\$0	\$0	\$0	\$19,654,800					
Administration and M&E	\$15,120,000		\$18,787,102	\$33,907,102	\$15,219,884	\$0	\$15,219,884	\$18,687,218					\$15,219,884
Total	\$ 616,834,504	\$1,067,265	\$35,696,753	\$652,531,257	\$360,389,699	\$182,329,153	\$542,718,852	\$109,812,405		\$182,329,153	\$285,456,394	\$8,312,316	\$66,620,989
Funding Needs (a+b)	\$ 585,910,268												
Unallocated Funds***	\$ 31,678,859												

As of 3/31/21; Source: PG&E SGPMA

SGPMA Memorandum Account (SGPMA)	
Funds in SGPMA as of 3/31/2021	(147,589,127)
Authorized Collections 2021	(54,000,000)
Authorized Collections 2022	(72,000,000)
Authorized Collections 2023	(72,000,000)
Authorized Collections 2024	(72,000,000)
Funding Available	(617,589,127)
Interest Accrued (2018-Q1 2021)	\$17,908,163
Forfeited Application Fees (2018-Q1 2021)	\$1,607,276

*This has already been allocated to the appropriate budgets but after 3/31/21

**Of this, \$66,620,989 has been paid; see cell P15

***Unallocated Funds include Interest Earned as well as unused Pre-2017 Reserved and PBI in Process funds which PG&E is evaluating.

**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