

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6261E
As of August 18, 2021

Subject: Notification of Energy Resource Recovery Account (ERRA) Reaching the Trigger Amount in Compliance with Decision 02-10-062 and Decision 08-08-011

Division Assigned: Energy

Date Filed: 07-16-2021

Date to Calendar: 07-21-2021

Authorizing Documents: D0210062

Authorizing Documents: D0808011

Disposition:	Accepted
Effective Date:	08-15-2021

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

July 16, 2021

Advice 6261-E

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

Subject: Notification of Energy Resource Recovery Account (ERRA) Reaching the Trigger Amount in Compliance with Decision 02-10-062 and Decision 08-08-011

Purpose

Pacific Gas and Electric Company (PG&E) hereby notifies the California Public Utilities Commission (Commission or CPUC) that its Energy Resource Recovery Account (ERRA) balance has surpassed the four percent Trigger Amount based on recorded balances for the May 2021 business cycle accounting close. PG&E submits this advice letter in compliance with Decision (D.) 02-10-062 and D.08-08-011.

PG&E does not request a change in rates. First, the balance is forecast to self-correct within 120 days. Moreover, PG&E currently forecasts an end-of-year 2021 ERRA undercollection of \$10 million, or 0.2 percent of the prior year's recorded generation revenues, and therefore a change in rates at this time is unnecessary. A rate change is further unnecessary because the Commission adopted a ratemaking framework to address the return of balances associated with bundled customer financing of capped 2020 Power Charge Indifference Adjustment (PCIA) rates over a three-year period, which is the primary driver of the May 2021 overcollected ERRA balance.¹

Background Concerning ERRA Trigger

Under D.02-10-062, PG&E is required to file an expedited application when its ERRA balancing account is four percent over or under-collected of the prior year's recorded generation revenues (or "the ERRA Trigger framework").² In the ERRA trigger application, the utility would include a projected account balance in 60 days or more from the date of filing to illustrate when the balance would reach the five percent threshold. PG&E may, on an expedited basis, request a change in rates to address the over-collection or under-collection and to ensure timely recovery of the projected ERRA balance.

¹ D. 20-12-038, Conclusion of Law 9; see *also*, pp. 18-19 (describing the adopted rate adder).

² D. 02-10-062, pp. 59-64; D. 04-01-040, p. 177.

In D.08-08-011, the Commission authorized PG&E to notify the Commission through an advice letter when the ERRA balance exceeds its trigger amount, instead of in an expedited application, if PG&E does not seek a change in rates and the ERRA balance is expected to self-correct below the Trigger Amount within 120 days of filing.³ No rate change is necessary because within 120 days of this advice letter PG&E anticipates the total overcollected balance will self-correct below the four percent Trigger Amount established in PG&E's Advice 6145-E.⁴

Recent Structural Changes to ERRA Are Impacting the ERRA Balances

In the Commission's *Decision Modifying the Power Charge Indifference Adjustment Methodology*, D.18-10-019, the Portfolio Allocation Balancing Account (PABA) was created and resulted in significant changes to how costs and revenues are recorded to ERRA, without updating the ERRA trigger mechanism.⁵ Additionally, D.18-10-019 implemented a capped PCIA rate to protect against rate volatility among departing load customers and established a cap-and-trigger mechanism. The undercollected PCIA revenues that exceeded the cap are the responsibility of eligible departed customers, and are refunded to bundled service customers under a separate CPUC action. The uncollected revenues are tracked in the PCIA Undercollection Balancing Account (PUBA) with the corresponding revenue shortfall financed by bundled customers, which is recorded as a credit in the PCIA Financing Subaccount (or the "ERRA-PFS") within ERRA.⁶

Subsequently, D.21-05-030 removed the PCIA rate cap on a going-forward basis. Because PG&E's 2020 PCIA rates were capped, bundled customers financed part of the departing load's PABA costs through their 2020 generation rates, which should have been the responsibility of departing load customers but for the cap. As a result, departing load customers accrued an obligation to repay bundled customers for costs associated with capped 2020 PCIA rates and that were financed by bundled customers through their 2020 generation rates, *i.e.*, the "PCIA Cap Revenue Deferral." This amount is also recorded in

³ D. 08-08-011, Ordering Paragraph 3.

⁴ Pursuant to D. 04-01-050, PG&E is required to establish the current year's trigger amount by April 1. For 2021, PG&E submitted Advice 6145-E proposing a 4 percent trigger amount of \$219 million and a 5 percent threshold amount of \$273 million for 2021. The advice letter became effective April 1, 2021.

⁵ On December 10, 2018, PG&E established the PABA and made modifications to associated generation-related balancing accounts, including the ERRA (see Advice 5440-E, approved on May 3, 2019 and effective date on January 1, 2019). Following the implementation of PABA, only market-based costs associated with PG&E's bundled load are recorded to ERRA and are recovered from bundled customers through the generation rate, while the above-market costs incurred on behalf of both bundled and departing load customers are recorded to PABA and recovered from bundled customers through the generation rates, and from departing load customers through the PCIA.

⁶ The ERRA-PFS was established in Advice 5624-E, to track the amount financed by bundled customers related to the revenue shortfall associated with capped PCIA rates for eligible departing load customers.

the ERRA-PFS. As described below, the accrued ERRA-PFS balance is a significant driver to the overcollection in the ERRA balancing account.

Recovering Uncollected Revenues Resulting from 2020 Capped PCIA Rates

Following implementation of capped 2020 PCIA rates, PG&E filed an expedited PUBA Trigger Application (A. 20-09-014) seeking authorization to increase departing load PCIA rates in 2021, and refund the same amount to bundled customers, due to a projected \$253 million undercollected balance in the PUBA as of December 31, 2020. Ultimately, PG&E's PUBA Trigger Application was consolidated with PG&E's 2021 ERRA Forecast Application, A. 20-07-002.

D.20-12-038, resolving PG&E's 2021 ERRA Forecast Application, established a ratemaking framework for departing load customers to address costs associated with 2020 capped PCIA rates. Under that framework the ERRA-PFS balance will be reduced over a three-year period. Specifically, D.20-12-038 authorized a rate adder to PCIA rates to amortize the 2020 PUBA balance from 2021 to 2023 rates.⁷ Under the adopted structure, as revenue is collected from departing load customers to reduce the revenue shortfall, the corresponding PCIA Cap Revenue Deferral is reduced in the ERRA-PFS. Because D.20-12-038 addresses the disposition of the ERRA-PFS balance tracked in ERRA over a three-year period, no rate change under the ERRA Trigger framework established in D.02-12-062 and D.08-08-011 is necessary to address the ERRA-PFS balance.

Notably, D.20-12-038, Conclusion of Law 10, established that the projected 2020 year-end PUBA balance addressed through a rate adder should not be counted towards the requirement for PG&E to file a new expedited trigger application when the PUBA balance exceeds the trigger point. However, D.20-12-038 did not make a corresponding conclusion excluding the ERRA-PFS balance from PG&E's ERRA Trigger calculation.

Status of ERRA Balance

Table 1 presents PG&E's monthly ERRA recorded and forecast balances that includes the ERRA-PFS. As of May 31, 2021, the recorded ERRA balance (including the ERRA-PFS) is overcollected by \$232 million, or 4.3 percent of PG&E's prior year recorded generation revenues. However, based on the May recorded balance, and forecasts of costs and revenues for June through December 2021, PG&E is currently forecasting an end-of-year 2021 ERRA undercollection of \$10 million, or 0.2 percent.

⁷ D.20-12-038, pp. 18-10 (describing the 3-year rate adder to address the 2020 PUBA balance) and Conclusion of Law 9 (approving PG&E's proposal to refund bundled customers amounts associated with financing of capped 2020 PCIA rates for departing load customers over a three-year period).

TABLE 1
2021 ERRA (OVER)/UNDER COLLECTED BALANCE
(Including PCIA Financing Subaccount)
(\$ Millions)

Line No.	Business Cycle Close	ERRA	ERRA	ERRA	5% Threshold Amount ^{1/}	Percent of prior year recorded generation revenues, excluding DWR	
		Main (A)	PFS (B)	Main + PFS (C)=(A)+(B)		(D)	
1	Jan-21	(34)	(266)	(300)	253	5.936%	Recorded
2	Feb-21	2	(258)	(256)	253	5.057%	Recorded
3	Mar-21	57	(268)	(211)	253	4.172%	Recorded
4	Apr-21	42	(260)	(218)	273	3.999%	Recorded
5	May-21	20	(252)	(232)	273	4.247%	Recorded
6	Jun-21	(45)	(241)	(286)	273	5.236%	Forecast ^{2/}
7	Jul-21	(89)	(230)	(319)	273	5.849%	Forecast ^{3/}
8	Aug-21	(46)	(220)	(266)	273	4.864%	Forecast ^{3/}
9	Sep-21	(85)	(211)	(295)	273	5.406%	Forecast ^{3/}
10	Oct-21	22	(203)	(181)	273	3.315%	Forecast ^{3/}
11	Nov-21	102	(196)	(94)	273	1.720%	Forecast ^{3/}
12	Dec-21	199	(189)	10	273	0.183%	Forecast ^{3/}

^{1/} Based on Advice 5798-E effective April 1, 2020 and Advice 6145-E effective April 1, 2021

^{2/} Forecast based on preliminary June recorded

^{3/} Forecast based on A. 21-06-001 plus prior period accumulated balance

Table 1, Column A through C, shows recorded balances for January through May 2021 and forecast balances for June through December. Column C includes both the (over)/undercollection recorded in the ERRA-Main and ERRA-PFS. Column D indicates the corresponding percentage of prior year generation revenue for that month.

The ERRA-Main records the power costs associated with PG&E's authorized procurement plan, as codified in Public Utilities Code Section 454.5(d)(3). Power costs recorded in ERRA are recovered solely from PG&E's bundled customer rates.

The ERRA-PFS records the PCIA Cap Revenue Deferral that results from implementing the capped PCIA rates for eligible departed load customers with the revenue shortfall financed by bundled customers through their generation rates. The PCIA Cap Revenue Deferral overcollection accumulated in the ERRA-PFS as of May is \$252 million and is currently forecast to be amortized to \$189 million by end of 2021 (See Table 1, Column B).

After excluding ERRA-PFS, the remaining ERRA-Main as of May is \$20 million undercollected and forecast to be \$199 million undercollected by end of 2021, or

respectively 0.4 percent and 3.6 percent of the currently established ERRA trigger threshold.

PG&E notes that following the adoption of rates authorized by D.20-12-038 in January 2021, and prior to the establishment of the 2021 Trigger Amount in April, PG&E's recorded entries to the ERRA exceeded the applicable 2020 Trigger and Threshold amounts. However, no action was taken because D.20-12-038 addressed the disposition of PG&E's year-end balances and the applicable 2021 Trigger Amount had not yet been established. Upon the establishment of PG&E's 2021 Trigger amount in Advice 6145-E, PG&E's ERRA balance did not exceed the 2021 Trigger Amount. Attachment 1 to this advice letter is the Declaration of Angelia Vega attesting that the account balances have reached the trigger threshold and the balance forecasted for the remainder of 2021.

No Rate Change Request is Necessary at This Time

Although PG&E's ERRA balance exceeded the Trigger Amount as of the May 2021 accounting cycle close, PG&E is not requesting a change in rates at this time for two reasons. First, as described above, the balance is forecasted to self-correct within 120 days of this filing. Accordingly, a rate change is not necessary.

Second, even if the ERRA balance was not forecast to self-correct within 120 days, D.20-12-038 addresses 2021 ratemaking applicable to the ERRA-PFS balance. In that decision, the Commission adopted PG&E's modified proposal to amortize the ERRA-PFS balance over three years starting from 2021. The ERRA-PFS balance is generation revenue financed by the bundled customers to the benefit of departing load customers resulting from capped 2020 PCIA rates. Or, in other words, the amounts in the ERRA-PFS are simply accounting entries tracking amounts owed by one set of customers to another. As described above, D.20-12-038 establishes a ratemaking framework to address the return of the ERRA-PFS to bundled customers over a three-year period. Amounts associated with the ERRA-PFS should not be returned to bundled customers as part of any additional 2021 generation rate adjustment.

Request for Relief

PG&E respectfully requests that the Commission (1) acknowledge the over-collection and that this notification advice letter satisfies the D.08-08-011 requirements that PG&E informed the Commission when its ERRA reached the 4 percent Trigger Amount; and (2) acknowledge that no rate change is necessary to address the overcollected balance.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **August 5, 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:

Sidney Bob Dietz II
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 (GO) 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 (GO 96-B, Section 3.11).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, **August 15, 2021**, which is 30 calendar days after the date of submittal.



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 E)

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) #: 6261-E

Tier Designation: 2

Subject of AL: Notification of Energy Resource Recovery Account (ERRA) Reaching the Trigger Amount in Compliance with Decision 02-10-062 and Decision 08-08-011

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.02-10-062 and D.08-08-011

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: 8/15/21

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 Bob Dietz II, 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:

Advice 6261-E
July 16, 2021

Attachment 1

PACIFIC GAS AND ELECTRIC COMPANY
DECLARATION OF ANGELIA VEGA
IN SUPPORT OF ADVICE 6261-E
PURSUANT TO THE COMMISSION'S APPROVED
ENERGY RESOURCE RECOVERY ACCOUNT (ERRA) TRIGGER MECHANISM

I, Angelia Vega, declare as following:

1. My business address is Pacific Gas and Electric Company (“PG&E”), 77 Beale Street, San Francisco, California. I am a Strategic Analyst, Expert in the Portfolio and Resource Forecasting Department within the Energy Policy and Procurement organization. I am responsible for developing testimony and analysis to support proceedings filed at the California Public Utilities Commission (“CPUC” or “Commission”) on matters related to generation procurement.

2. I am a Fellow of the Chartered Association of Certified Accountants from the United Kingdom. I joined PG&E in 2005, initially working as a Senior Accounting Analyst within the Controllers’ Department, and then as an Expert Regulatory Analyst in the Rates and Regulatory Analytics Department. My assignments in these departments were: accounting for various balancing accounts; participating in the development and implementation of accounting process improvements; providing analysis on recorded and forecast electric revenue and cost; and developing testimony and analysis to support proceedings filed at the CPUC on matters related to generation procurement. My job was transferred to the Portfolio and Resource Forecasting Department in 2018. I have previously sponsored testimony before the CPUC, including in prior Energy Resource Recovery Account (ERRA) Forecast proceedings.

3. As of May 31, 2021, PG&E recorded an ERRA overcollection, including the PCIA Financing Subaccount (PFS), of \$232 million or 4.3 percent of PG&E’s prior year recorded generation revenues. Based on the May recorded balance, and forecasts of costs and revenues for June through December 2021, PG&E is currently forecasting an end-of-year 2021 ERRA undercollection of \$10 million, or 0.2 percent as presented in Table 1.

TABLE 1
2021 ERRA (Over)/Under Collected Balances
(Including PCIA Financing Subaccount)
(\$ Millions)

Line No.	Business Cycle Close	ERRA Main (A)	ERRA PFS (B)	ERRA Main + PFS (C)=(A)+(B)	5% Threshold Amount ^{1/} (D)	Percent of prior year recorded generation revenues, excluding DWR (E)=(C)/D)*5%	
1	Jan-21	(34)	(266)	(300)	253	5.936%	Recorded
2	Feb-21	2	(258)	(256)	253	5.057%	Recorded
3	Mar-21	57	(268)	(211)	253	4.172%	Recorded
4	Apr-21	42	(260)	(218)	273	3.999%	Recorded
5	May-21	20	(252)	(232)	273	4.247%	Recorded
6	Jun-21	(45)	(241)	(286)	273	5.236%	Forecast ^{2/}
7	Jul-21	(89)	(230)	(319)	273	5.849%	Forecast ^{3/}
8	Aug-21	(46)	(220)	(266)	273	4.864%	Forecast ^{3/}
9	Sep-21	(85)	(211)	(295)	273	5.406%	Forecast ^{3/}
10	Oct-21	22	(203)	(181)	273	3.315%	Forecast ^{3/}
11	Nov-21	102	(196)	(94)	273	1.720%	Forecast ^{3/}
12	Dec-21	199	(189)	10	273	0.183%	Forecast ^{3/}

^{1/}Based on Advice 5798-E effective April 1, 2020 and Advice 6145-E effective April 1, 2021

^{2/}Forecast based on preliminary June recorded

^{3/}Forecast based on A. 21-06-001 plus prior period accumulated balance

The ERRA balance presented in Table 1, Column C includes the both the (over)/undercollection recorded in the ERRA-Main (Column A) and ERRA-PFS (Column B).

The ERR-PFS is not an over-collected balance but is recorded to ERRA as a credit. It tracks generation revenue financed by bundled customers to the benefit of departed load customers because of capped PCIA rates. The PCIA Cap Revenue Deferral accumulated in the

ERRA-PFS as of May is \$252 million and is currently forecast to be amortized to \$189 million by end of 2021 (See Table 1, Column B).

In Decision 20-12-038, the Commission adopted PG&E's modified proposal to ERRA-PFS balances over three years starting from 2021. After excluding ERRA-PFS, the remaining ERRA-Main as of May is \$20 million undercollected and forecast to be \$199 million undercollected by end of 2021, or respectively 0.4 percent and 3.6 percent of the currently authorized trigger threshold.

I declare under penalty of perjury that the foregoing is true and correct. Executed at San Francisco, California, this 16th day of July, 2021.

/s/ *Angelia Vega*
ANGELIA VEGA

**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