

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 4476G/6293E
As of September 23, 2021

Subject: Modification to Electric Preliminary Statement Part IA and Gas Preliminary Statement Part FD

Division Assigned: Energy

Date Filed: 08-09-2021

Date to Calendar: 08-11-2021

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	09-08-2021

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Annie Ho

415-973-8794

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

August 9, 2021

Advice 4476-G/6293-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California – Energy Division

Subject: Modification to Electric Preliminary Statement Part IA and Gas Preliminary Statement Part FD

Pacific Gas & Electric Company (PG&E) hereby submits to the California Public Utilities Commission (Commission or CPUC) the following changes to its tariffs. The revised tariff sheets are listed on Attachment 1 and are attached hereto.

Purpose

The purpose of this Tier 2 advice letter is to modify PG&E's Electric Preliminary Statement Part IA, *California Consumer Privacy Act Memorandum Account – Electric (CCPAMA-E)*, and Gas Preliminary Statement Part FD, *California Consumer Privacy Act Memorandum Account, California Consumer Privacy Act Memorandum Account - Gas (CCPAMA-G)*, to clarify that the accounts record incremental costs related to compliance with the California Consumer Privacy Act of 2018 (CCPA), as updated by the California Privacy Rights Act (CPRA) of 2020.

Background

On March 27, 2019, PG&E filed Application (A.) 19-03-020 requesting authority to establish CCPAMA-E and CCPAMA-G to track incremental costs related to compliance with the CCPA. In Decision (D.) 19-09-026, the Commission ordered PG&E to submit a Tier 1 advice letter to establish CCPAMA-E and CCPAMA-G. PG&E complied with the submission of Advice 4290-G and 5907-E.

Subsequent to the establishment of CCPAMA-E and CCPAMA-G, the CCPA was updated by the CPRA, which was passed by voters on November 3, 2020 and will become effective on January 1, 2023. The CPRA modifies the scope of the CCPA and the underlying statutes, California Civil Code Sections 1798.100 – 1798.199.100, but the relief sought by PG&E when establishing CCPAMA-E and CCPAMA-G and reasons and basis for the requested relief in A. 19-03-020 remain unchanged.

Tariff Revisions

PG&E proposes to modify Preliminary Statements, CCPAMA-E and CCPAMA-G, to clarify that the memo accounts track incremental costs incurred by PG&E that are the result of compliance with the CCPA as amended by the CPRA of 2020. The newly modified tariffs will be named Electric Preliminary Statement Part IA, *California Consumer Privacy Memorandum Account – Electric (CCPMA-E)*, and Gas Preliminary Statement Part FD, *California Consumer Privacy Memorandum Account - Gas (CCPMA-G)*.

The revised tariff sheets are listed on Attachment 1. For your convenience, redline versions of the tariff revisions are included as Attachment 2.

Rates

CPUC approval of this submittal would not increase any current rate or change, cause the withdrawal of service, or conflict with any rate schedule or rule.

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 August 30, 2021, which is 21 days¹ 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:

¹ The 20-day protest period concludes on a weekend, therefore, PG&E is moving this date to the following business day.

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 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

The CPRA was passed on November 3, 2020, and PG&E began working on CPRA implementation in January of 2021. Accordingly, PG&E requests that this Tier 2 advice submittal become effective January 1, 2021 to reflect the work recorded to the CCPAMA accounts thus far.

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.19-03-020. 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 Bob Dietz II
Director, Regulatory Relations

Attachments

cc: Service List of A.19-03-020



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 M)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

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

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4476-G/6293-E

Tier Designation: 2

Subject of AL: Modification to Electric Preliminary Statement Part IA and Gas Preliminary Statement Part FD

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:

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: 1/1/21

No. of tariff sheets: 6

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: See Attachment 1

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:

Clear Form

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
51179-E	ELECTRIC PRELIMINARY STATEMENT PART IA CALIFORNIA CONSUMER PRIVACY MEMORANDUM ACCOUNT - ELECTRIC (CCPMA-E) Sheet 1	45528-E
51180-E	ELECTRIC TABLE OF CONTENTS Sheet 1	50945-E
51181-E	ELECTRIC TABLE OF CONTENTS Sheet 17	50803-E

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
37332-G	GAS PRELIMINARY STATEMENT PART FD CALIFORNIA CONSUMER PRIVACY MEMORANDUM ACCOUNT - GAS (CCPMA-G) Sheet 1	35320-G
37333-G	GAS TABLE OF CONTENTS Sheet 1	37318-G
37334-G	GAS TABLE OF CONTENTS Sheet 6	37227-G



Sheet 1

ELECTRIC PRELIMINARY STATEMENT PART IA

CALIFORNIA CONSUMER PRIVACY MEMORANDUM ACCOUNT - ELECTRIC (CCPMA-E) (T)

IA. California Consumer Privacy Memorandum Account – Electric (CCPMA-E) (T)

1. PURPOSE: The purpose of the California Consumer Privacy Memorandum Account is to record incremental electric capital costs and expenses related to implementing the requirements of the California Consumer Privacy Act of 2018 as updated by the California Privacy Rights Act of 2020. Costs that can be attributed specifically to electric service will be recorded to this account. General costs that cannot be attributed specifically either to providing electric service or gas service will be allocated 55% electric and 45% gas. (T)
2. APPLICABILITY: The California Consumer Privacy Memorandum Account applies to all electric customer classes, except for those schedules or contracts specifically excluded by the Commission. (T)
3. REVISION DATE: Disposition of the balances in this account will be addressed in PG&E's next General Rate Case, or other application or separate proceeding, or as otherwise authorized by the Commission. (T)
4. RATES: The California Consumer Privacy Memorandum Account does not have a rate component. (T)
5. ACCOUNTING PROCEDURE: PG&E shall maintain the California Consumer Privacy Memorandum Account by making the following entries to the account at the end of each month, as applicable: (T)
 - a. A debit entry equal to the incremental expenses related to implementation of the California Consumer Privacy Act as updated by the California Privacy Rights Act of 2020; (T)
 - b. A debit or credit entry equal to the incremental capital revenue requirement based on incurred capital costs, including without limitation IT system and software capital revenue requirements, excluding Revenue Fees and Uncollectibles (RF&U). Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
 - c. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission, and
 - d. An entry, as appropriate, each month equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.



ELECTRIC TABLE OF CONTENTS

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Maps, Contracts and Deviations	50635-E	
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(Continued)

Advice 6293-E
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

August 9, 2021



ELECTRIC TABLE OF CONTENTS

Sheet 17

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Part GD	Smart Grid Pilot Deployment Project Balancing Account.....	32540,32541, 32542-E
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Part GF	Customer Data Access Balancing Account – Electric	33136-E
Part GH	Mobile Home Park Balancing Account - Electric	47077,47078-E
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Part GQ	Energy Efficiency Financing Balancing Account – Electric (EEFMA-E)	35292,35293,35294-E
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Part GV	Distribution Interconnection Memorandum Account (DIMA)	40575-E
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Part GZ	Distributed Energy Resources Distribution Deferral Account	43656,43657,43658-E
Part HA	Avoided Cost Calculator Memorandum Account.....	40000-E
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Part HD	Tax Memorandum Account (TMA-E).....	41088-E
Part HE	Executive Compensation Memorandum Account (ECMA-E)	40699,40700-E
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Part HG	Emergency Consumer Protections Memorandum Account - Electric (WCPMA-E).....	43007,46342,44215-E
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Part HM	Public Policy Charge Balancing Account (PPCBA)	44715,46124,46125,46126-E
Part HO	Statewide Energy Efficiency Balancing Account – E (SWEEBA-E)	47069,47070,47071-E
Part HQ	Fire Risk Mitigation Memorandum Account (FRMMA)	43314-E
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Part JC	Voluntary Allocation and Market Offer Memorandum Account (VAMOMA-E)	50801-E

(Continued)



GAS PRELIMINARY STATEMENT PART FD Sheet 1
CALIFORNIA CONSUMER PRIVACY MEMORANDUM ACCOUNT - GAS (CCPMA-G) (T)

FD. California Consumer Privacy Memorandum Account – Gas (CCPMA-G) (T)

1. PURPOSE: The purpose of the California Consumer Privacy Memorandum Account is to record incremental gas capital costs and expenses related to implementing the requirements of the California Consumer Privacy Act of 2018 as updated by the California Privacy Rights Act of 2020. Costs that can be attributed specifically to gas service will be recorded to this account. General costs that cannot be attributed specifically either to providing electric service or gas service will be allocated 55% electric and 45% gas. (T)
2. APPLICABILITY: The California Consumer Privacy Memorandum Account applies to all gas customer classes, except for those schedules or contracts specifically excluded by the Commission. (T)
3. REVISION DATE: Disposition of the balances in this account will be addressed in PG&E's next General Rate Case, or other application or separate proceeding, or as otherwise authorized by the Commission.
4. RATES: The California Consumer Privacy Memorandum Account does not have a rate component. (T)
5. ACCOUNTING PROCEDURE: PG&E shall maintain the California Consumer Privacy Memorandum Account by making the following entries to the account at the end of each month, as applicable: (T)
 - a. A debit entry equal to the incremental expenses related to implementation of the California Consumer Privacy Act as updated by the California Privacy Rights Act of 2020; (T)
 - b. A debit or credit entry equal to the incremental capital revenue requirement based on incurred capital costs, including without limitation IT system and software capital revenue requirements, excluding Revenue Fees and Uncollectibles (RF&U). Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
 - c. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission, and
 - d. An entry, as appropriate, each month equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.



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(Continued)

Advice 4476-G
Decision

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

August 9, 2021



GAS TABLE OF CONTENTS

Sheet 6

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Part DR	Hydrostatic Station Testing Memorandum Account (HSTMA)	33084-G
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Part DT	Critical Document Program Memorandum Account (CDPMA)	32812-G
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Part EE	Wildfire Expense Memorandum Account (WEMA-G)	34367-G
Part EF	Statewide Energy Efficiency Balancing Account – Gas (SWEEBA-G)	36119,36120,36121-G
Part EG	Dairy Biomethane Pilots Balancing Account (DBPBA)	34715-G
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Part FC	Rate Base Adjustment Memorandum Account (RBAMA)	35422-G
Part FD	California Consumer Privacy Memorandum Account – Gas (CCPMA-G)	37332-G
Part FH	Disconnections Memorandum Account – Gas (DMA-G)	36191*-G
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(Continued)

Attachment 2

Redline Tariffs



GAS PRELIMINARY STATEMENT PART FD Sheet 1
CALIFORNIA CONSUMER PRIVACY-~~Act~~ MEMORANDUM ACCOUNT — GAS (CCPMA-G)

(N)
(N)

FD. California Consumer Privacy-~~Act~~ Memorandum Account – Gas (CCPMA-G)

(N)

1. PURPOSE: The purpose of the California Consumer Privacy-~~Act~~ Memorandum Account is to record incremental gas capital costs and expenses related to implementing the requirements of the California Consumer Privacy Act of 2018 as updated by the California Privacy Rights Act of 2020. Costs that can be attributed specifically to gas service will be recorded to this account. General costs that cannot be attributed specifically either to providing electric service or gas service will be allocated 55% electric and 45% gas.
2. APPLICABILITY: The California Consumer Privacy-~~Act~~ Memorandum Account applies to all gas customer classes, except for those schedules or contracts specifically excluded by the Commission.
3. REVISION DATE: Disposition of the balances in this account will be addressed in PG&E's next General Rate Case, or other application or separate proceeding, or as otherwise authorized by the Commission.
4. RATES: The California Consumer Privacy-~~Act~~ Memorandum Account does not have a rate component.
5. ACCOUNTING PROCEDURE: PG&E shall maintain the California Consumer Privacy ~~Act~~ Memorandum Account by making the following entries to the account at the end of each month, as applicable:
 - a. A debit entry equal to the incremental expenses related to implementation of the California Consumer Privacy Act as updated by the California Privacy Rights Act of 2020;
 - b. A debit or credit entry equal to the incremental capital revenue requirement based on incurred capital costs, including without limitation IT system and software capital revenue requirements, excluding Revenue Fees and Uncollectibles (RF&U). Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
 - c. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission, and
 - d. An entry, as appropriate, each month equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)



ELECTRIC PRELIMINARY STATEMENT PART IA

Sheet 1

(N)

CALIFORNIA CONSUMER PRIVACY ~~ACT~~ MEMORANDUM ACCOUNT - ELECTRIC (CCPAMA-E)

(N)

IA. California Consumer Privacy ~~Act~~ Memorandum Account – Electric (CCPAMA-E)

(N)

1. PURPOSE: The purpose of the California Consumer Privacy ~~Act~~ Memorandum Account is to record incremental electric capital costs and expenses related to implementing the requirements of the California Consumer Privacy Act of 2018 as updated by the California Privacy Rights Act of 2020. Costs that can be attributed specifically to electric service will be recorded to this account. General costs that cannot be attributed specifically either to providing electric service or gas service will be allocated 55% electric and 45% gas.
2. APPLICABILITY: The California Consumer Privacy ~~Act~~ Memorandum Account applies to all electric customer classes, except for those schedules or contracts specifically excluded by the Commission.
3. REVISION DATE: Disposition of the balances in this account will be addressed in PG&E's next General Rate Case, or other application or separate proceeding, or as otherwise authorized by the Commission.
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5. ACCOUNTING PROCEDURE: PG&E shall maintain the California Consumer Privacy ~~Act~~ Memorandum Account by making the following entries to the account at the end of each month, as applicable:
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 - b. A debit or credit entry equal to the incremental capital revenue requirement based on incurred capital costs, including without limitation IT system and software capital revenue requirements, excluding Revenue Fees and Uncollectibles (RF&U). Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
 - c. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission, and
 - d. An entry, as appropriate, each month equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)

**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
Semptra 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