

September 14, 2021

Advice Letter 4587-E
(Southern California Edison Company ID U 338 E)

Advice Letter 6326-E
(Pacific Gas and Electric Company ID U 39 E)

Advice Letter 3845-E
(San Diego Gas & Electric Company ID U 902 E)

Advice Letter 177-E
(Liberty Utilities (CalPeco Electric) LLC ID U 933 E)

Advice Letter 425-E
(Bear Valley Electric Service Company ID U 913 E)

Advice Letter 660-E
(PacifiCorp U 901 E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric), Bear Valley Electric Service, Inc., and PacifiCorp's Updates to GHG Templates

PURPOSE

In compliance with California Public Utilities Commission (CPUC or Commission) Decision (D.) 21-08-026 (Decision), Ordering Paragraph (OP) 13, Southern California Edison Company (SCE) hereby submits this advice letter on behalf of Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Liberty Utilities (CalPeco Electric), Bear Valley Electric Service, Inc. (BVES), PacifiCorp d/b/a Pacific Power (PacifiCorp), and itself (collectively, the Joint Investor Owned Utilities or Joint IOUs) to update GHG templates D-1 through D-5 in Appendix D of D.14-10-033, and as modified in D.14-10-055 and D.15-01-024.

BACKGROUND

Rulemaking (R.) 20-05-002 reviewed the current customer climate credits that California provides through the California Air Resources Board's (CARB's) Cap-and-Trade Program. D.21-08-026 adopted revisions to ensure that the credits are compliant with current statute and regulation and streamline certain existing processes, determined the volumetric dispersion of the small business California Climate Credit and the volumetric dispersion of residential California Climate Credit for BVES customers do not currently comply with CARB's Cap-and-Trade Regulation, modified the small business California Climate Credit to be a flat rate approach mirroring the other IOUs residential California Climate Credit, directed BVES to utilize the same allocated allowance auction proceeds distribution methods for the emissions-intensive trade-exposed (EITE), small business, and residential customers as other IOUs.

The Decision also offers general guidance for template updates (emphasis added):

The updates to Templates D-1 through D-5 will facilitate the **proper accounting** of greenhouse gas allowance auction proceeds, calculation of credits, **improve the transparency** of funding to programs, and **reduce workload** by removing any templates or portions of templates that are no longer needed to properly administer the California Climate Credits.

Further, the Decision directed that if and when CARB implements an adopted process to obtain sole responsibility for crediting large EITE facilities, to minimize leakage associated with Cap-and-Trade Program costs in purchased energy, the Commission would utilize the procedure recommended in the Staff Straw Proposal on the electric IOU Cap-and-Trade Program Allowance Proceeds.

Concerning the California Industry Assistance for small and medium as well as large EITE facilities, the Decision amended the dollar conversion factor formula to eliminate the need for the true-up process; and 2) replaced the existing emissions factors with emission factors calculated by CARB as part of the calculation of the allowance allocations for CARB's California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation. For small and medium EITE facilities only, the Decision continued the existing once-per-compliance-period self-attestation auditing requirements for 2021-2030. Further, the Commission's Energy Division (ED) retained responsibility for calculating small and medium EITE facility credits. The current distribution of the residential California Climate Credit in April and October is also retained. However, SDG&E retained its August and September distribution through 2022, which allows for the completion of the two-year (2020-2021) summer distribution pilot approved in D.19-12-002, a Commission review of the two annual reports and a subsequent determination on the continuation of the summer distribution.

Lastly, the Decision authorized ED to host a workshop on August 30, 2021, to discuss updates to Templates D-1 through D-5 of Appendix D of D.14-10-033 (as modified by

D.14-10-055 and D.15-01-024), as needed to align with changes in the Decision. The Joint IOUs also held a Joint IOU conference call after the workshop, and this advice letter provides an update to Templates D-1 through D-5 based on those discussions consistent with changes and guidance per the Decision. The revised templates are provided in Attachments A through E.

DISCUSSION

Template D-1

The Joint IOUs recommend only limited updates to Template D-1 to allow the Small Business Volumetric credit to transition to return in the same manner as the residential Climate Credit. These edits can also allow for the additional line related to unbundled customer count, which will allow parties to calculate the total GHG allowance revenue return for Community Choice Aggregators (CCAs). Other potential changes were discussed at the August 30 workshop¹ unrelated to the transition of the remaining volumetric Climate Credit to a fixed credit; however, the Joint IOUs agree that those issues are either out of scope or do not require template changes. Instead, a footnote for Line 2 “Allocated Allowance” will be included in Template D-1 to indicate that the value is not adjusted for the Energy Imbalance Market (EIM) Purchaser Emission allocated by the CARB to the individual IOU.²

¹ See slide 21, Presentation *GHG Allocated Allowance Auction Proceeds Accounting Templates Workshop*.

² Effective April 1, 2019, the CARB identifies the electric distribution utilities (EDU) as EIM Purchaser under CARB Regulation section 95892. A confidential EIM Purchaser Emission will be provided by CARB to reduce the GHG allowance allocated to the EDU for auction in the GHG Cap-and-Trade Program.

Image I
Updates to Template D-1

17	Net GHG Revenues Available for Customers in Forecast Year (\$) (Line 15 + Line 16)
18	GHG Revenue Returned to Eligible EITE Customers (\$)
19	EITE Customer Return Small Business Volumetric Return Residential Volumetric Return Subtotal EITE + Volumetric Returns
20	Semi-Annual Climate Credit
21	Number of Eligible Residential Households
22	Number of Eligible Small Business Customers
23	Total Customers Eligible for Climate Credit
24	Per-Household Customer Semi-Annual Climate Credit (\$) (0.5 x (Line 17 + 19) ÷ Line 23)
25	Total Revenue Distributed for the Climate Credit (\$) (2 x Line 23 x Line 24)
26	Revenue Balance (\$)

Template D-2

Within the Energy Resource Recovery Account (ERRA) Forecast proceeding, this table has been used to estimate the IOU's total bundled GHG emissions costs, which are then allocated to all customer classes to estimate the GHG burden of the small business customer class. That GHG cost burden is then used as the basis to calculate the amount of GHG allowance revenue allocated to that class for return on a volumetric basis. Given the elimination of the volumetric return, the Joint IOUs recommend eliminating this table. Further, forecast GHG cost data appears in other sections of each IOU's ERRA Forecast filing.

The Joint IOUs understand that D.19-04-016 requires a portion of Template D-2 to be presented in each of the three large IOU's ERRA Compliance filing; however, this only references the recorded GHG emissions and costs whereas the ERRA Forecast filing was required to show both the forecast and recorded data. Indeed, the recorded cost data used in the ERRA Forecast filing was sourced from the ERRA Compliance proceeding, so again, there does not appear to be a need for the information in

Template D-2 in the ERRR Forecast GHG allowance return section.³ Consistent with Decision guidance to reduce workload, the Joint IOUs recommend eliminating Template D-2.

Template D-3

No changes to Template D-3 are necessary.

Template D-4

This table uses the Template D-2 GHG cost information as its source to compute the allocation of GHG costs across customer classes, based on both the bundled and unbundled split. The megawatt-hour (MWh) assumptions are also shown, as are the estimated GHG allowance revenue allocations. The Joint IOUs believe that this table is no longer required since its purpose use to align the GHG allowance revenue volumetric offset for small business customers with their GHG cost burden. Further, its estimation of the GHG costs is potentially erroneous since the IOUs do not know the departing load entities' GHG emission profile. Since CCAs have begun serving an increasingly larger portion of the retail load, the accuracy of the data in this table has likely decreased. Consistent with Decision guidance to properly account for GHG revenue returns and to reduce workload, the Joint IOUs recommend eliminating Template D-4.

In the alternative, if this Template remains, a simple conversion of the sales (MWh to customer count) may be all that is needed.

Rate Class By Customer Group	Bundled Customers			
	Forecast Customer Count MWh Sales	Forecast GHG Revenue Req (\$)	Rate Impact (\$/kWh)	Forecast GHG Revenue (\$)
A	B	C	D	E

Template D-5

Consistent with Decision guidance to properly account for GHG revenue returns and to reduce workload, the Joint IOUs recommend elimination of Template D-5 for the following reasons. First, since the GHG chapter no longer requires a showing of GHG costs to calculate allowance revenue returns, this table, which shows the total GHG costs, is also no longer required. Second, the Joint IOUs contend the table should be eliminated because the Joint IOUs believe the emissions intensity metric shown in this table is inconsistent with other metrics.

As with the previous Templates D-1 through D-5, the Joint IOUs note that there should be continued flexibility in reporting and/or making slight annotated modifications to

³ D.19-04-016 modifies D.15-01-024 to amend the Weighted Average Cost (WAC) of GHG compliance instruments methodology (WAC methodology) in Attachment C. D.15-01-024 modifies D.14-10-055 and D.14-10-033.

templates for information that is not currently applicable to a utility or does not conform with the way a utility does its reporting to the CARB.

CONCLUSION

In 2013, when the GHG allowance return tables were first created, these Templates provided necessary GHG cost information; however, over time, these tables have been modified to solely focus on the non-volumetric return of GHG allowance revenue and, therefore, the GHG revenue return Templates no longer require any GHG cost information to be presented to properly present the return of revenue. GHG cost information is presented in other chapters of each IOU's ERRR Forecast filing, Energy Cost Adjustment Clause (ECAC) application, or Tier 2 advice letter, as applicable.

ATTACHMENTS

This advice letter contains the following attachment:

Attachment A: Templates D-1 through D-5 with proposed updates.

This advice letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

AUTHORIZATION

SCE submits this advice letter with authorization from PG&E, SDG&E, BVES, Liberty Utilities, and PacifiCorp.

TIER DESIGNATION

Pursuant to OP 13 of D.21-08-026, this advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

SCE requests this advice letter be effective October 14, 2021, 30 days from the day submitted.

PROTESTS

Given the approaching ERRR forecast filing deadlines, the Joint IOUs request that the Commission grant the Joint IOUs' request to shorten the protest period for this advice letter from 20 days to seven days.

Anyone wishing to protest this advice letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than seven days, September 21, 2021, after the date of this advice letter. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Shinjini C. Menon
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone (626) 302-3377
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

Pooja Kishore
Regulatory Affairs Manager
PacifiCorp
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Portland, Oregon 97232
Telephone: (503) 813-7314
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Quan Nguyen
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Sidney Bob Dietz II
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77 Beale Street, Mail Code B1 3U
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Downey, CA 90241
Liberty Utilities, California
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E-Mail: Dan.Marsh@libertyutilities.com

There are no restrictions on who may submit a protest; however, the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of General Order (GO) 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B, R.20-05-002, and A.13-08-002 et al service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at ProcessOffice@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the AL at SCE's corporate headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's website at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Matt Sheriff at (626) 302-1895 or by electronic mail at matt.sheriff@sce.com.

Southern California Edison Company

/s/ Shinjini C. Menon
Shinjini C. Menon

SCM:ms:jm
Enclosure



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Darrah Morgan

Phone #: (626) 302-2086

E-mail: AdviceTariffManager@sce.com

E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4587-E

Tier Designation: 2

Subject of AL:

Southern California Edison Company, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric), Bear Valley Electric Service, Inc., and PacifiCorp 's Updates to GHG Templates

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 #:
Decision 21-08-026

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

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: 10/14/21

No. of tariff sheets: -0-

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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: None

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets: None

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: Shinjini C. Menon
Title: Managing Director, State Regulatory Operations
Utility Name: Southern California Edison Company
Address: 8631 Rush Street
City: Rosemead
State: California Zip: 91770
Telephone (xxx) xxx-xxxx: (626) 302-3377
Facsimile (xxx) xxx-xxxx: (626) 302-6396
Email: advicetariffmanager@sce.com

Name: Tara S. Kaushik c/o Karyn Gansecki
Title: Managing Director, Regulatory Relations
Utility Name: Southern California Edison Company
Address: 601 Van Ness Avenue, Suite 2030
City: San Francisco
State: California Zip: 94102
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx: (415) 929-5544
Email: karyn.gansecki@sce.com

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

Attachment A

GHG Revenue and Reconciliation Application Form

Notes:

Utilities should complete the GHG Revenue and Reconciliation Application Form in accordance with the procedures described in Attachment D of Decision 14-10-033.

Gray shading indicates confidential information. However, additional information may be confidential based on a utility's particular circumstances.

Template D-1: Annual Allowance Revenue Receipts and Customer Returns

Line Description	Year t-1		Year t	
	Forecast	Recorded	Forecast	Recorded
1 Proxy GHG Price (\$/MT)	-	N/A	-	N/A
2 Allocated Allowances (MT)	-	-	-	-
3 Revenues (\$)				
4 Prior Balance	N/A	N/A	-	-
5 Allowance Revenue	-	-	-	-
6 Interest	-	-	-	-
7 Franchise Fees and Uncollectibles	-	-	-	-
8 Subtotal Revenues	-	-	-	-
9 Expenses (\$)				
10 Outreach and Administrative Expenses (from Template D3)	-	-	-	-
11 Franchise Fees and Uncollectibles	-	-	-	-
12 Interest	-	-	-	-
13 Subtotal Expenses	-	-	-	-
14 Allowance Revenue Approved for Clean Energy or Energy Efficiency Programs (\$)	-	-	-	-
15 Net GHG Revenues (\$) (Line 8 + Line 13 + Line 14)	-	-	-	-
16 GHG Revenues to be Distributed in Future Years (\$)	-	-	-	-
17 Net GHG Revenues Available for Customers in Forecast Year (\$) (Line 15 + Line 16)	-	-	-	-
18 GHG Revenue Returned to Eligible EITE Customers (\$)				
19 EITE Customer Return	-	-	-	-
Small Business Volumetric Return	-	-	-	-
Residential Volumetric Return	-	-	-	-
Subtotal EITE + Volumetric Returns	-	-	-	-

20	Semi-Annual Climate Credit				
21	Number of Eligible Residential Households	-	-	-	-
22	Number of Eligible Small Business Customers	-	-	-	-
23	Total Customers Eligible for Climate Credit	-	-	-	-
24	Per-Household Customer Semi-Annual Climate Credit (\$) (0.5 x (Line 17 + 19) ÷ Line 23)	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
25	Total Revenue Distributed for the Climate Credit (\$) (2 x Line 23 x Line 24)	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
26	Revenue Balance (\$)	N/A	#DIV/0!	N/A	#DIV/0!

Template D-2: Annual GHG Emissions and Associated Costs

Line	Description	Year t-1		Year t	
		Forecast	Recorded	Forecast	Recorded
1	Direct GHG Emissions (MTCO₂e)				
2	Utility Owned Generation (UOG)	-	-	-	-
3	Tolling Agreements	-	-	-	-
4	Energy Imports (Specified)	-	-	-	-
5	Energy imports (Unspecified)	-	-	-	-
6	Qualifying Facility (QF) Contracts	-	-	-	-
7	Contracts with Financial Settlement	-	-	-	-
8	Subtotal	-	-	-	-
9	Indirect GHG Emissions (MTCO₂e)				
10	CAISO Market Purchases	-	-	-	-
11	Contract Purchases	-	-	-	-
12	Subtotal	-	-	-	-
13	Total Emissions (MTCO₂e)	-	-	-	-
14	Proxy GHG Price (\$/MT)	-	-	-	-
15	GHG Costs (\$)				
16	Direct GHG Costs	-	-	-	-
17	Direct GHG Costs - Financial Settlement	-	-	-	-
18	Indirect GHG Costs	-	-	-	-
19	Previous Year's Forecast Reconciliation (Line 21)	N/A	N/A	-	-
20	Total Costs	-	-	-	-
21	Forecast Variance (\$)	N/A	-	N/A	-

The Joint IOUs are requesting that this Template no longer be required for GHG Climate Credit reporting.

Template D-3: Detail of Outreach and Administrative Expenses

Line Description	Year t-1		Year t	
	Forecast	Recorded	Forecast	Recorded
1 Utility Outreach Expenses (\$)				
2 Detail of outreach activities	-	-	-	-
3 Subtotal Outreach	-	-	-	-
4 Utility Administrative Expenses (\$)				
5 Detail of administrative activities	-	-	-	-
6 Subtotal Administrative	-	-	-	-
7 Utility Outreach and Administrative Expenses (\$) (Line 3 + Line 6)	-	-	-	-
8 Additional (Non-Utility) Statewide Outreach (\$)	-	-	-	-
9 Total Outreach and Administrative Expenses (\$) (Line 7 + Line 8)	-	-	-	-

Template D-4: Forecast Revenue Requirement and Revenues by Rate Schedule

Rate Schedule (A)	<u>Bundled Customers</u>				<u>Unbundled Customers</u>			
	Forecast Customer Count Sales- (MWh) (B)	Forecast GHG Revenue Requirement (\$) (C)	Rate Impact (\$/kWh) (D)	Forecast GHG Revenue (\$) (E)	Forecast Customer Count Sales- (MWh) (F)	Forecast GHG Revenue Requirement (\$) (G)	Rate Impact (\$/kWh) (H)	Forecast GHG Revenue (\$) (I)
Insert Rate Schedules								
Total								

The Joint IOUs are requesting that this Template no longer be required for GHG Climate Credit reporting, however, if it remains only minor edits are needed.

Template D-5: History of Revenue, Costs, and Emissions Intensity

Line	Year t-5	Year t-4	Year t-3	Year t-2	Year t-1	Year t
1	Total GHG Revenue (\$)					
2	Total GHG Costs (\$)					
3	Emissions Intensity (MTCO ₂ e/MWh)					

The Joint IOUs are requesting that this Template no longer be required for GHG Climate Credit

**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

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

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