

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6591E
As of February 24, 2023

Subject: Joint Utilities' Request for Commission Approval to Use a Portion of the Inter-Agency Working Group's Transportation Electrification Forecast Component in Each Utility's 2023-2024 GNA/DDORs

Division Assigned: Energy

Date Filed: 05-11-2022

Date to Calendar: 05-16-2022

Authorizing Documents: D1802004

Disposition:	Withdrawn
Effective Date:	None

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Joff Morales

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JMorales@sdge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
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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
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- 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



Clay Faber – Director
Regulatory Affairs
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cfaber@sdge.com

May 11, 2022

ADVICE LETTER 4005-E

San Diego Gas & Electric Company (U 902-E)

ADVICE LETTER 6591-E

Pacific Gas & Electric Company (U 39-E)

ADVICE LETTER 4792-E

Southern California Edison Company (U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: JOINT UTILITIES' REQUEST FOR COMMISSION APPROVAL TO USE A PORTION OF THE INTER-AGENCY WORKING GROUP'S TRANSPORTATION ELECTRIFICATION FORECAST COMPONENT IN EACH UTILITY'S 2023-2024 GNA/DDORS

PURPOSE

For purposes of conducting their 2023 Distribution Planning Processes (DPPs) (where the results are documented in each utility's GNA/DDOR), San Diego Gas & Electric Company (SDG&E), Pacific Gas & Electric Company (PG&E), and Southern California Edison Company (SCE) (collectively, the Joint Utilities) request Commission approval to use the Inter-Agency Working Group (IAWG) Transportation Electrification (TE) scenario component in the years 2030-2032. The Joint Utilities have already requested Energy Division staff approval to use specified forecast elements from the CEC's 2021 IEPR, including the "High" TE element for the years 2023-2029.¹

Assuming the Energy Division staff approves the Joint Utilities' letter request, and with timely Commission approval of this Advice Letter request, the Joint Utilities will conduct their 2023 DPPs using the forecast elements summarized in Table A below. This forecast will be a composite forecast combining forecast elements from the 2020/2021 IEPR demand forecasts and the IAWG High Electrification (HE) scenario. Importantly the IAWG HE scenario incorporates the expected impacts from the reasonably anticipated key California Air Resources Board (CARB) policies that will have significant TE impacts in the later years of the planning window.

¹ See Joint Utilities' May 11, 2022, letter to the Energy Division staff.

BACKGROUND

Reform #3 in Attachment A to the May 11, 2020, Ruling in the Distribution Resources Plans (DRP) proceeding (R.14-08-013) provides for Energy Division staff approval of California Energy Commission (CEC)-produced Integrated Energy Policy Report (IEPR) datasets for use in developing the IOUs' Grid Needs Assessment (GNA) report and Distribution Deferral Opportunities Report (DDOR). Per Ordering Paragraph 1b of D.18-02-004, if "annual updates" to CEC forecasts "are not feasible" the IOUs are authorized to propose adjustments via a Tier 2 Advice Letter. The Joint Utilities believe the projected TE loads for the latter years of the CEC's 2021 IEPR forecast horizon are not reflective of the probable long-term consequences of policies and regulations currently under development by state agencies. Accordingly, this Tier 2 Advice Letter requests approval to replace the projected TE loads in the latter years of the 2020/2021 IEPR forecast, specifically years 2030-2032, with the projected TE loads from the IAWG scenario. This Advice Letter is submitted in advance of the planned May 16, 2022, Distribution Forecast Working Group (DFWG) stakeholder workshop.

DISCUSSION

Consistent with the Track 1 scope of the High DER Future Proceeding (R. 21-06-017),² Commission approval of this adjustment will better align the DPP, GNA, and DDOR with the Transportation Electrification Framework (TEF) and increased electrification and electric vehicle adoption, including the goal of accelerating EV charging deployment to support California's ambitious climate and EV charging goals.³

The Joint Utilities are concerned that the 2021 IEPR demand forecasts do not adequately represent the long-term load impacts from transportation electrification (TE) expected to be driven by California Air Resources Board (CARB) Zero-Emission Vehicle (ZEV) policies currently under development. These policies include the Advanced Clean Cars II (ACC II) and the Advanced Clean Fleet (ACF) rules. These CARB rules are important to ensure the state meets the Governor's Executive Order ZEV goals (Executive Order N-79-20).⁴ While the High TE case of the 2021 IEPR demand forecasts comes closest to closing the gap in the later years of the forecast horizon, even this forecast does not reflect the likely level of transportation electrification loads in the outer years (see Chart 1 Comparison of TE forecasts below). For multiple forecast cycles, CEC's IEPR load forecasts have excluded some major policies or regulations that have been announced but not yet finalized. The policy impacts from regulations that are currently in development are therefore not included in the 2021 IEPR demand forecasts for the TE component.

² Assigned Commissioner's Scoping Memo and Ruling, November 15, 2021, p. 4

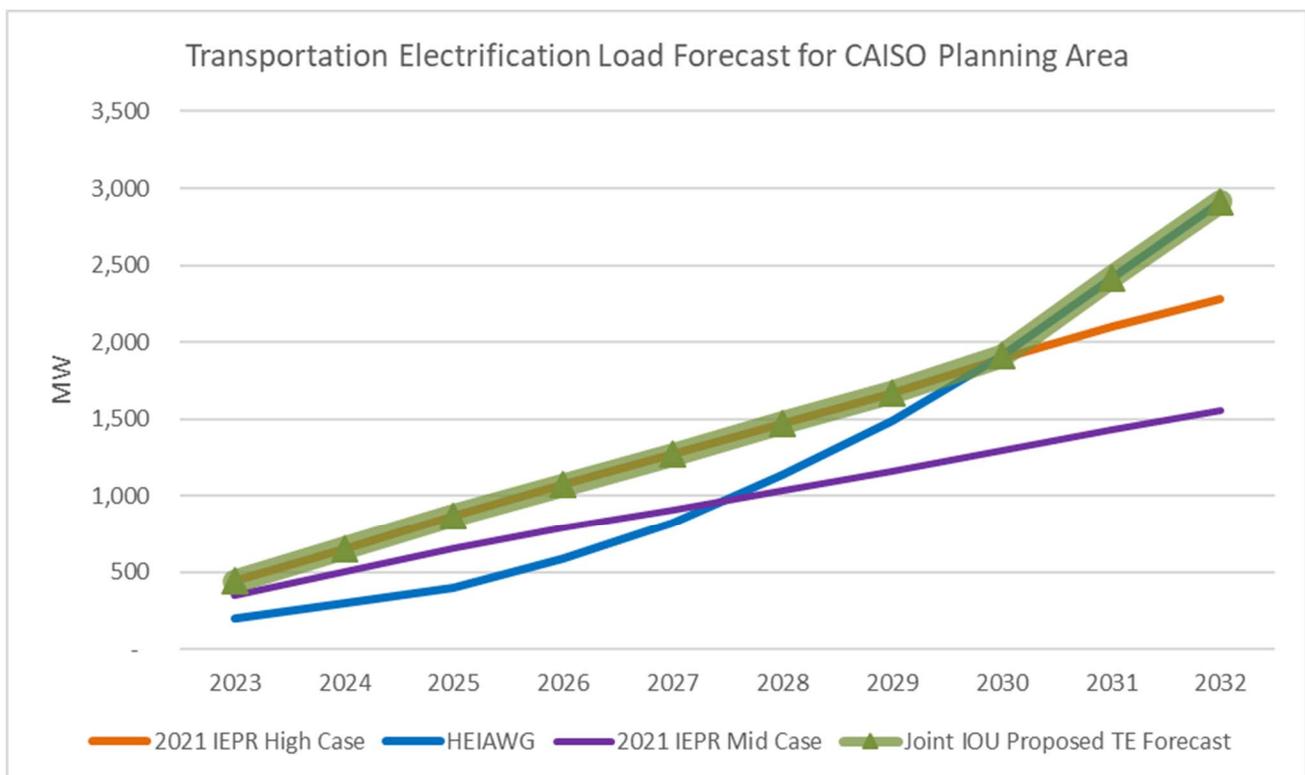
³ 2022 TEF Staff Proposal pg. 15.

⁴ Executive Order N-79-20 stipulates that 100% of in-state sales of new passenger cars and light-duty trucks will be zero-emission by 2035 and 100% of medium- and heavy-duty vehicles sales must be zero emission by 2045 where feasible.

THE INTER-AGENCY SCENARIO INCLUDES THE SIGNIFICANT TE IMPACTS FROM THE ACC II AND THE ACF

The CEC has developed additional assessments that incorporate load impacts from developing policies. The Inter-Agency Working Group (IAWG) High Electrification (HE) scenario,⁵ incorporates the expected impacts from the CARB ACC II for light-duty vehicles and the ACF rules impacting medium-and heavy-duty vehicles.⁶ The ACC II and ACF policies drive significant impacts above and beyond the IEPR TE High Demand Forecast in the 2030-2032 timeframe.

Chart 1: Comparison of TE forecasts (IEPR Mid, IEPR High⁷, IAWG HE Scenario, & Joint Utility 2023 GNA Proposed)



⁵ CEC IEPR Demand Scenario April 7 Workshop, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=242552>

⁶ See Slide 5 in Status Report Inter-Agency Working Group High Electrification Scenario (<https://efiling.energy.ca.gov/GetDocument.aspx?tn=242552>)

⁷ The total TE peak MW impacts from 2021 IEPR High Case are estimated based on the associated hourly forecast published by the CEC, "CED 2021 Hourly Forecast - CAISO - High Baseline - AAEE Scenario 1 - AAFS Scenario 4.xlsx". The details of the estimations are included in the attachment, "Joint IOU Proposed TE Forecast.xlsx". These MW numbers may be subject to changes pending additional information that will be provided by the CEC.

The Joint Utilities are concerned that the increased electrification driven by the CARB policy impacts – especially in the later years when the policy requirements accelerate – may require large, long-lead time electric infrastructure projects. Utilities must start the planning and licensing process for these larger, long-lead time projects soon to ensure that the grid can provide the necessary supportive infrastructure for the successful vehicle transition these developing policies are designed to accomplish.

AN AVAILABLE, RELIABLE GRID IS CRITICAL TO ENABLE VEHICLE TRANSITION POLICIES, SUPPORT CUSTOMERS, AND INSTILL CONFIDENCE IN FLEETS

Grid-readiness and the availability of supportive grid infrastructure needed to power electric vehicles are primary concerns for adopters of electric vehicles. This is especially punctuated for commercial fleets, the largest of which are anticipated to be regulated by CARB's ACF rule.⁸ Industry has remarked on the concerns around the necessary grid infrastructure to support vehicle transition plans:

- “A reliable fuel source is critical to fleet electrification and increasing the availability of commercial EVs. As companies scale investments in technology and infrastructure to 'green' their operations, grid reliability will be a critical factor in the decision-making process. Fleet operators must have confidence in the electricity system in order to adopt EVs.” (Ceres & the California Truck Association⁹)
- “Auto Innovators puts forth the following EV Infrastructure Guiding Principles to significantly advance EV acceptance and use: Prepare for timely, cost-effective grid upgrades to support EV charging.” (Alliance for Automotive Innovation, representing the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S.¹⁰)

Use of the Inter-Agency scenario's TE component in the 2030-2032 timeframe will enable the Joint Utilities to use forecasts which better reflect the developing CARB policies that will impact fleets and truck and car manufacturers – and effectively support customers with planning and development of the grid upgrades needed to accommodate the levels of electrification likely to result from these policies.

⁸ The developing ACF would apply to entities that own or operate 50 or more vehicles or have \$50 million or more in gross annual revenue.

⁹ 2020, The Road to Fleet Electrification, Ceres & the California Trucking Association
<https://www.ceres.org/sites/default/files/reports/2020-05/The%20Road%20to%20Fleet%20Electrification.pdf>

¹⁰ Alliance for Automotive Innovation
<https://www.autosinnovate.org/about/advocacy/EV%20Infrastructure%20Initiative.pdf>

LOAD FORECASTS ARE KEY FOR THE PLANNING OF LARGER, LONG LEAD-TIME GRID INFRASTRUCTURE PROJECTS

Forecasts govern how utilities plan for future system needs and using the right forecast appropriately tuned to future needs is of paramount importance to the state's and utilities' planning activities. Utility DPP studies using these approved forecasts (a) are leveraged to form the basis of funding requests in respective general rate cases (GRC) authorizing capital expenditures to support projects for customer needs, and (b) serve as the basis of the work executed by the utilities on an ongoing basis to identify where investments or Distributed Energy Resource (DER) deferrals are required to support changing loads reflected by customer needs and provide the engineering analysis for solution design.

California's policies related to climate change and air quality are a precursor for what is likely to be dramatic market transformation. The electric load growth impacts, in terms of both density and pace, will challenge the utilities' ability to plan unless those impacts are reflected in load forecasts that span the full duration of the longest lead-time grid infrastructure additions; e.g., 7-10, or more, years for new substations and subtransmission lines.¹¹ From inception to energization, larger projects can take 7-10, or more, years to complete, with a largely inflexible and lengthened timeline driven by licensing processes involving significant environmental review and public input. Some utilities are also particularly concerned with getting ahead of these projects due to the unique regulatory jurisdiction of subtransmission equipment.¹²

Some of the incremental needs driven by CARB policies may include these larger, long-lead time projects. Given the periodic timing of utility funding authorization, now on a 4-year cycle and the timely need for utilities to start the planning and licensing process for projects with long-lead times, it is important for utilities to be able to use forecasts that better reflect these anticipated future electrical loads.

THE JOINT UTILITIES REQUEST USING THE 2021 IEPR HIGH TE THROUGH 2029, THEN USING THE IAWG SCENARIO TE COMPONENT TO ACCOUNT FOR INCREMENTAL IMPACTS FROM CARB POLICIES IN THE YEARS 2030-2032

As illustrated in Chart 1 and discussed above, the Joint Utilities are concerned that for the years 2030-2032, the 2021 IEPR "High" TE component does not adequately account for the level of transportation electrification expected to be driven by policies CARB is currently developing. As summarized in Table A below, the Joint Utilities propose using the 2021 IEPR's High TE Forecast through 2029, then using the IAWG TE scenario for the years 2030-2032.

¹¹ Generally, smaller projects such as modifying an existing distribution circuit may take 6 months to 2 years, mid-sized projects such as new distribution circuits or substation modification projects can take 2-3 years, while larger projects such as new 33 kV substations or large subtransmission line reconductor projects may take 5 or more years. Larger projects, such as new substation or subtransmission lines, requiring licensing, permitting, or land rights acquisition can take 7, 10, or more years.

¹² SCE has subtransmission equipment subject to CPUC jurisdiction. Planning for this subtransmission system takes place as part of SCE's DPP. For PG&E and SDG&E, planning for all equipment operated above 66kV takes place as part of the CAISO's Transmission Planning Process (TPP).

Table A: Proposed Forecast¹³

		2023-2024 GNA/DDOR Cycle		
		SCE	PG&E	SDG&E
	CEC-Adopted IEPR Vintage	2021 IEPR Mid	2021 IEPR Mid	2021 IEPR Mid
Forecast	Solar PV	2021 IEPR Mid - Mid	2021 IEPR Mid - Mid	2021 IEPR Mid - Mid
	Energy Storage	2021 IEPR Mid - Mid	2021 IEPR Mid - Mid	2021 IEPR Mid - Mid
	Transportation Electrification (Light Duty)	2021 IEPR High TE (2023-2029) IAWG (2030-2032)	2021 IEPR High TE (2023-2029) IAWG (2030-2032)	2021 IEPR High TE (2023-2029) IAWG (2030-2032)
	Transportation Electrification (Medium and Heavy-Duty)	2021 IEPR High TE (2023-2029) IAWG (2030-2032)	2021 IEPR High TE (2023-2029) IAWG (2030-2032)	2021 IEPR High TE (2023-2029) IAWG (2030-2032)
	Additional Achievable Energy Efficiency	2021 IEPR Mid - Low (AAEE Scenario 2)	2021 IEPR Mid - Low (AAEE Scenario 2)	2021 IEPR Mid - Low (AAEE Scenario 2)
	Fuel Switching	2021 IEPR Mid - Mid (AAFS Scenario 3)	2021 IEPR Mid - Mid (AAFS Scenario 3)	2021 IEPR Mid - Mid (AAFS Scenario 3)
	Load Modifying Demand Response	2021 IEPR Mid - Mid	2021 IEPR Mid - Mid	2021 IEPR Mid - Mid
	Base Load	2021 IEPR Mid - Mid	2021 IEPR Mid - Mid	2021 IEPR Mid - Mid

While use of a forecast component that is not included in the IEPR is a deviation from prior practice, the deviation is appropriate given the 2021 IEPR's "High" TE component does not reflect the long-term consequences of CARB policies currently under development. The adjustment requested in this Advice Letter will facilitate utilities to adequately plan ahead for potential long-term needs driven by policy objectives, market transformation, and decarbonization goals.

¹³ The proposed forecast elements are the same for each of the three utilities.

EFFECTIVE DATE

The Joint Utilities understand that this submittal is subject to Energy Division disposition and is classified as Tier 2 (effective after staff approval) pursuant to OP 1b of D.18-02-004 and GO 96-B and respectfully request that this submittal be effective on June 10, 2022, which is 30 days from the date of this filing.

PROTEST

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact and should be submitted expeditiously. The protest must be submitted electronically and must be received no later than May 31, 2022, which is 20 days of the date of this Advice Letter was submitted with the Commission. There is no restriction on who may submit a protest.

The protest should be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via e-mail to the address shown below on the same date it is delivered to the Commission.

SDG&E

Attn: Greg Anderson
Regulatory Tariff Manager
E-mail: GAnderson@sdge.com & SDGETariffs@sdge.com

PG&E

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

SCE

Shinjini C. Menon
Director, State Regulatory Operations
Southern California Edison Company
E-mail: AdviceTariffManager@sce.com

Tara S. Kaushik
Director, Regulatory Relations
Southern California Edison Company
c/o Karyn Gansecki
E-mail: Karyn.Gansecki@sce.com

NOTICE

A copy of this submittal has been served on the utilities and interested parties shown on the attached list, including interested parties in R.21-06-017, by providing them a copy hereof either electronically or via the U.S. mail, properly stamped and addressed. Address changes should be directed to SDG&E Tariffs by email to SDGETariffs@sdge.com.

/s/ Clay Faber

CLAY FABER
Director – Regulatory Affairs



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: San Diego Gas & Electric (U902)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Joff Morales

Phone #: 858-650-4098

E-mail: JMorales@sdge.com

E-mail Disposition Notice to: SDGETariffs@sdge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4005-E

Tier Designation: 2

Subject of AL: Joint Utilities' Request for Commission Approval to Use a Portion of the Inter-Agency Working Group's Transportation Electrification Forecast Component in Each Utility's 2023-2024 GNA/DDORs

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.18-02-004

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

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: N/A

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: 6/10/22

No. of tariff sheets: N/A

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: 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
Email: EDTariffUnit@cpuc.ca.gov

Name: Greg Anderson
Title:
Utility Name: San Diego Gas & Electric
Address: 8330 Century Park Court, CP32C
City: San Diego
State: California Zip: 92123
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: GAnderson@sdge.com

Name:
Title:
Utility Name:
Address:
City:
State: California Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

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AT&T

Regulatory

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Biofuels Energy, LLC

K. Frisbie

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Green Charge

K. Lucas

Hanna and Morton LLP

N. Pedersen

JBS Energy

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B. Elder

Manatt, Phelps & Phillips LLP

D. Huard
R. Keen

McKenna, Long & Aldridge LLP

J. Leslie

Morrison & Foerster LLP

P. Hanschen

MRW & Associates LLC

General

NLine Energy

M. Swindle

NRG Energy

D. Fellman

Pacific Gas & Electric Co.

M. Lawson
M. Huffman
Tariff Unit

RTO Advisors

S. Mara

SCD Energy Solutions

P. Muller

SD Community Power

L. Fernandez
L. Utouh

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

C. Frank

SPURR

M. Rochman

Southern California Edison Co.

K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

K. Davoodi

US General Services Administration

D. Bogni

Valley Center Municipal Water Distr

G. Broomell

Western Manufactured Housing
Communities Association

S. Dey

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puainc@yahoo.com
AKanzler@anaheim.net

Service List

R.21-06-017

**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.
Braun Blasing Smith Wynne, P.C.
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
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
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie
Green Power Institute
Hanna & Morton
ICF
International Power Technology

Intertie

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
McClintock IP
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
Uplight
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy