

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 26, 2022

Advice Letter 6606-E / -A / -B

Annie Ho
Pacific Gas and Electric Company
77 Beale Street. Mail Code B13U
San Francisco, CA 94177

Sidney Bob Dietz II. c/o Megan Lawson
Director, Regulatory Relations
Pacific Gas and Electric Company 77 Beale Street. Mail Code B13U
San Francisco, CA 94177

SUBJECT: Empower EV Pilot Program Implementation Plan

Dear Ms. Ho:

Pacific Gas and Electric Company (PG&E) advice letter (AL) 6606-E-B is approved and is consistent with the directives in Decision (D.) 19-09-006 for the Empower Electric Vehicle (EV) Charger Incentive and Education Program.

Background

On September 9, 2019, the California Public Utilities Commission (CPUC) issued D.19-09-006, authorizing PG&E to spend \$4.13 million over two years to implement the Empower EV pilot program (Empower). The program supports EV adoption among low- to moderate-income residential customers¹ by providing all eligible customers with a point-of-sale rebate to cover up to \$500 to purchase a level 2 (L2) EV charger and low-income customers with a rebate of up to \$2,000 for panel upgrades. PG&E estimates that approximately 2,000 L2 chargers and 800-panel upgrades will be installed in Empower². Pursuant to Section 4.4 of D.19-09-006, PG&E was to conduct a competitive solicitation to select a third-party to oversee the implementation of Empower.

Ordering Paragraph (OP) 2 of D.19-09-006, directed PG&E to file a Tier 2 Advice Letter 90 days from the date when the third-party implementer is selected to describe: 1) the income verification process, including a comparison of process to other electric vehicle programs, 2) the guidelines

¹ Ordering Paragraph 1 of D.-19-09-006 defined low-income and moderate-income for the purposes of the Empower program as 400 percent or less of the Federal Poverty Level.

² D.19-09-006 p.4 "The program proposes to provide approximately 2,000 chargers and 800 panel upgrades, as well as marketing, outreach and education. For low- and moderate-income customers, PG&E proposes that the customer will receive and own the charger with a point-of-sale incentive of \$500 per customer, at no charge to the customer. Low-income customers will be eligible for an additional incentive of up to \$2,000 for a panel upgrade. PG&E requests a total of \$4.13 million in cost recovery.

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for participation by tenants of rental properties, 3) the program evaluation process, including a data collection plan and preliminary format of the final program report, 4) how the implementor will offer each participating customer assistance in determining the optimal rate for their home load profile, and 5) how the data collection metrics, adopted in the Decision may be reported separately for a California Air Resources Board's (CARB) Community Air Protection Program (CAPP) community, if such a community is selected³. On May 5, 2021, PG&E selected GRID Alternatives (GRID) as the third-party implementer for Empower. On May 26, 2022, in compliance with OP 2 of D.19-09-006, PG&E filed AL 6606-E to propose the Empower EV Pilot Program Implementation Plan.

Protest

Cal Advocates filed a protest to AL 6606-E on June 17, 2022. Cal Advocates' protest asserts that PG&E's AL fails to include hourly household energy use data for one year before and after charger installation as a data collection metric for all program participants⁴. Additionally, Cal Advocates argues that PG&E's proposal fails to provide a plan to separately report data metrics on members of CARB Community Air Protection Program (CAPP⁵) that participate in the program. Cal Advocates recommends Energy Division direct PG&E to submit a supplemental advice letter to specify that they will: 1) collect hourly household energy use one year before and after charger installation for all customers, and 2) report data collection metrics separately for members of CAPP communities, should members of a CAPP community be selected for Empower. Cal Advocates asserts these two actions are required by the Decision in OP 2 and OP 10, and will allow the Commission and parties to review, analyze, and understand any changes to household energy use, and any air pollution mitigation effects that Empower may have on these communities.

PG&E's Supplementals

On July 14th, 2022, filed supplemental AL 6606-E-A superseding AL 6606-E in its entirety.

PG&E states that the Empower EV Pilot program's eligible electric vehicle supply equipment (EVSE) only offers Level 2 networked chargers for all eligible customers. Empower EV benefits to provide up to \$2,000 for electric panel upgrades, completed by a licensed electrician, and point-of-sale Level 2 networked charger costs no more than \$500 per unit.

On August 15th, 2022, ED staff met with PG&E to discuss additional necessary corrections to make the AL compliant with decision D.19-09-006, namely:

- Hourly household energy use one year before and after charger installation.

³ D-19-09-006 p.8 "PG&E proposes to initially focus its outreach efforts in the cities of Fresno, Oakland, and San Jose"

⁴ D.19-09-006 p.19 "The Commission is also persuaded by Cal Advocates' proposal to collect data on hourly household energy use one year before and after charger installation, as this is readily-available data that is likely to yield valuable information... Accordingly, the following additional data shall be collected: (1) hourly baseline household energy use one year before and after charger installation"

⁵ D.19-09-06 p.20 "CAPP Communities are Richmond; West Oakland; Calexico, El Centro, and Heber; South Sacramento – Florin; Portside Environmental Justice Neighborhoods (West National City, Barrio Logan, Logan Heights, and Sherman Heights); Shafter; South Central Fresno; East Los Angeles, Boyle Heights, and West Commerce; Muscoy and San Bernardino; and Wilmington, West Long Beach, and Carson."

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- Optional demographic data collection for program participants.
- Details for separate data collection metrics if a CAPP community is selected as one of PG&E's targeted communities.

On August 24th 2022, PG&E filed supplemental AL 6606-E-B superseding AL 6606- E-A in its entirety.

PG&E states it will provide hourly household energy use one year before and after charger installation as part of the final evaluation report on "Estimated charger utilization data and load profiles", as required by OP 10 of D.19-09-006. Additionally, PG&E will provide monthly reporting for "Charger utilization and data-aggregated customer load curves, pending charger model, connectivity, and EVSE supplier data sharing."⁶

Further, PG&E clarifies it will not report its data collection metrics separately for CAPP communities as there is no geographic limitation for program reporting. However, if a CAPP community is selected as one of the targeted communities, PG&E will work with Empower EV Pilot's Program Implementer, GRID Alternatives, to submit an Advice Letter describing how the data collection metrics may be reported separately for CAPP communities.

Discussion

Energy Division finds PG&E's data collection proposal to collect and analyze hourly household energy use one year before and after charger installation is consistent with D.19-09-006 and OP 10⁷.

We also find PG&E's data reporting and metrics proposed in AL 6606-E-B to comply with D.19-09-006⁸ and that it is reasonable for PG&E to not report data from CARB's CAPP communities as no such community will be participating in Empower and reject Cal Advocate's protest. The Decision allowed PG&E to retain flexibility in adjusting their criteria and targeted communities based on information gathered during the implementation process and adopted PG&E's criteria for selecting the targeted communities⁹. PG&E stated in its reply to Cal Advocates that PG&E has not selected a CAPP community to participate in the Empower program. As such, PG&E did not submit a plan for separately reporting CAPP communities in the Empower program¹⁰. However, PG&E must ensure that it will submit an advice letter detailing how it will separately collect and report data for a CAPP community should PG&E select a CAPP community as one of its targeted communities in the program¹¹.

⁶ AL 6606-E-B p.5

⁷ OP 10 "The following data metrics shall be collected through the Empower program: (12) Hourly household energy use one year before and after charger installation"

⁸ OP 2

⁹ D.19-09-006 Section 4.2 Community Selection Criteria

¹⁰ Reply p.2 "PG&E has not yet selected a CAPP community for participation in the Program"

¹¹ D.19-09-006 p.20 "Should PG&E select a CAPP community as one of its targeted communities, the Commission requests that PG&E describe, through an Advice Letter, how the adopted data metrics may be reported separately for the CAPP community."

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Disposition

Energy Division approves PG&E's AL 6606-E-B and finds it to be consistent with D.19-09-006.

Sincerely,

A handwritten signature in black ink that reads "Leuwam Tesfai".

Leuwam Tesfai
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

Cc: AdviceTariffManager@sce.com
EDTariffUnit@cpuc.ca.gov
Paula.Gruending@cpuca.ca.gov
Paul.Hernandez-Minjarez@cpuc.ca.gov

August 24, 2022

Advice Letter 6606-E-B

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Second Supplemental: Implementation Details for Empower EV Pilot Program

This supplemental advice letter supersedes Advice Letters 6606-E and 6606-E-A in their entirety. The purpose of this supplement to Advice Letters 6606-E and 6606-E-A is to edit the Empower EV Pilot program's implementation details (the Program Evaluation Process section below). The changes made apply to all Eligible Customers.

Changes made include:

- Removal of 'optional' from demographic data
- Addition of hourly household energy use one year before and after charger installation
- Updated CAPP section – removed extra verbiage and strictly addressed 'if such a community is selected'

Purpose

Pursuant to Ordering Paragraph 2 of Decision (D.) 19-09-006, Pacific Gas and Electric Company (PG&E) hereby submits its proposal to address the following Empower EV pilot program implementation details:

- (1) The income verification process, including a comparison of the process to other electric vehicle programs;
- (2) The guidelines for participation by tenants of rental properties for the Empower program;
- (3) The program evaluation process, including a data collection plan and a preliminary format of the final program report;
- (4) How the program will offer each participating customer assistance in determining the optimal rate for their home load profile; and,
- (5) How the data collection metrics, adopted in Ordering Paragraph 10, may be reported separately for a California Air Resources Board's Community Air Protection Program community, if such a community is selected.

Background

Empower EV was approved for implementation by the California Public Utilities Commission (CPUC) in September 2019 in D.19-09-006¹. Empower EV focuses on supporting EV adoption with low-to-moderate income eligible customers by reducing three key barriers:

- Total cost of ownership;
- Lack of knowledge about EVs and their benefits; and
- Access to charging infrastructure

Empower EV benefits include providing Eligible Customers up to \$2,000 for electric panel upgrades, completed by licensed electricians, and point-of-sale Level 2 networked charger cost coverage at no more than \$500 per unit.

Income Verification Process

On May 5, 2021, GRID Alternatives (GRID) was selected as the third-party implementer for Empower EV. GRID will utilize the California Air Resources Board's (CARB) Access Clean California income verification process, detailed below, to ensure compliance with Empower EV's eligibility criterion that customers have incomes at or below 400% of the Federal Poverty Level (FPL), and to reduce application barriers to the maximum extent possible as other electric vehicle programs utilize the same income verification process as CARB's Access Clean California, including through categorical eligibility determinations. GRID will collect and assess the following documents to verify income for Empower EV:

- Applicants must submit a signed affidavit attesting to their household income AND must provide one of the following:
 - Applicants who file taxes will have their income confirmed by the tax transcript via IRS Form 4506-C, the Income Verification Express Service (IVES) Request for Transcript of Tax Return;
 - Applicants who do not file taxes must verify their income with either the most recent available IRS Form W-2, Wage and Tax Statement; or pay stubs or bank statements; or,
 - Categorical eligibility: Applicants who have provided validated income verification documentation for another program within the past 6 months showing income levels at or below 400% FPL are automatically deemed eligible. If income verification documentation is older than 6 months, the applicant must provide updated documentation per the guidelines above. Otherwise applicants may provide additional categorical eligibility as provided

¹ Decision (D.) 19-09-006: DECISION APPROVING THE APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR THE EMPOWER ELECTRIC VEHICLE CHARGER INCENTIVE AND EDUCATION PROGRAM, available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M314/K145/314145047.PDF>

on Page 2 of Required Income Document Guide² for the California Alternative Rates for Energy (CARE) Program.

Some of the specific details regarding how household size and income are calculated, and proven via processes described above, may change over time as CARB (and/or other agencies) update their policies and create an aligned income verification standard. The desired outcome is to ensure applicants do not have to follow different processes across these programs, so any updates will be in the spirit of standardization and coordination with CARB's Access Clean California income verification process. Any such changes will be documented so that Applicants are aware of the most up-to-date process.

Guidelines for Renters

PG&E will use the following guidelines for participation by tenants of rental properties in the Empower EV program.

Renter Pathway 1: Applicants who are renters will be required to get formal, written pre-approval from the property owner to install a networked Level 2 charger. GRID will work with PG&E to create a pre-approval template document for renters to use with property owners.

Renter Pathway 2: For low-income renters who physically can't install a Level 2 networked charger or whose landlord has not provided permission, GRID will offer an alternative charging package that includes a portable Level 2 networked charger for those tenants who have access to a 240v outlet. This charger will remain with the tenant in the event they move to another residence.

Program Evaluation Process

Salesforce Customer Relationship Management (CRM)

GRID Alternatives plans to build on its existing Salesforce CRM infrastructure in coordination with its Operations and Clean Mobility teams (including the Access Clean California program) to collect applicant and project data. The Access Clean California CRM environment (also known as an "instance") will be used to accept and process applications while GRID's project instance will be used to manage subcontractors and track installations. GRID will work with its Operations team, Clean Mobility team, and Salesforce developer to ensure proper communication between the platforms for efficiency and a cohesive project flow.

GRID will ensure that CRM fields are sufficient to develop reports for required reporting to PG&E. The data fields and reports will follow the requirements PG&E has set out for

² https://www.pge.com/pge_global/common/pdfs/save-energy-money/help-paying-your-bill/EN_income_guide.pdf

monthly and quarterly reporting. The fields shall include, or be functionally equivalent to, but not limited to:

- Customer name;
- Project address (must match PG&E account address);
- EV make, model, year, purchased or leased, new or pre-owned;
- EV Purchase Date;
- Home owned or rented;
- Race/Ethnicity;
- Age;
- Gender;
- Nationality;
- Languages Spoken;
- Lead Source;
- Household size;
- Hourly household energy use one year before and after charger installation (OP 10-12);
- Total Annual Income (OP 10-7);
- Income Verified Method;
- Number of participants that are renters versus homeowners;
- Application Submission Date;
- Application Approval Date;
- Client survey fields as needed;
- Sub-contractor;
- Panel upgrade cost;
- Charger distribution date;
- Charger utilization (OP 10-8);
- Number of customers that are participants of any of CARB's EV equity programs or other EV incentives programs (OP 10-10);
- Application Submittal to Express Connections/Service Planning Date;
- Service Planning Response Date;
- Project Completion Date;
- Map of charger locations aggregated by census tract (OP 10-14); and,
- Customer PG&E Account Number.

Monthly and Quarterly Reporting

GRID will develop monthly and quarterly reporting templates to be agreed upon by PG&E in advance of the first report.

Scope of monthly reporting: GRID Alternatives will provide monthly reporting including:

- Monthly budget spend;
- Total number of customers served;
- Number of renters versus homeowners broken down by charger type (OP 10-13);

- Demographic information of participants (age, race/ethnicity, gender, nationality, language) (Op 10-11);
- How customers learned about Empower EV;
- At what point customers decided to enroll (before/after EV purchase);
- Vehicle purchase date;
- Type of vehicle and lease versus purchase (Op 10-6)
- Total amount of charger rebates issued (OP 10-1);
- Total amount of panel upgrade rebates issued (Op 10-2);
- Total number of chargers installed;
- Average total out-of-pocket cost paid by customers for installation, charger purchase and other costs (OP 10-3)
- Average total costs for panel upgrades (Op 10-4);
- Average total costs for chargers (OP 10-5);
- Type of electrical work performed at each household (panel upgrade amperage, circuitry, etc.);
- Charger utilization, and data-aggregated customer load curves pending charger model, connectivity, and EVSE supplier data sharing;
- Programmatic challenges and solutions, when applicable;
- Number of customers that are participants of any of CARB's EV equity programs or other EV incentives programs;
- Why customers dropped from program participation, if known; and,
- Additional information and metrics, to be mutually agreed upon by GRID and PG&E.

Scope of quarterly reporting. GRID Alternatives will provide quarterly reporting including:

- Customer feedback received via email, phone, or through case managers;
- Rate choice (collected during intake and again during pre-program voluntary Driver Behavior Survey)
- CBO participation and customer feedback;
- Map of charger locations with census tract information;
- Outreach and/or translation services;
- Customer participation in other CARB/ EV incentive programs; and,
- Additional information and metrics, to be mutually agreed upon by GRID and PG&E.

Final Evaluation Report

GRID will work in collaboration with PG&E to provide a final program evaluation report to be shared online and with other California investor- owned utilities for educational purposes. The preliminary format for the report is as follows:

- Executive Summary with key program metrics and top learnings.
- Overview of program structure, goals, and implementation work.

- Quantitative breakdown and analysis of core program metrics, including:
 - Geographical distribution of program funding;
 - Distribution of utility rate schedule selection among participants;
 - Selection of EV charging equipment, both in general and across participant types;
 - Hourly household energy, including:
 - Hourly baseline household energy use one year before and after charger installation;
 - Number of participants that are renters versus homeowners; and,
 - A pre-program and post-program voluntary Driver Behavior Study.
 - Overall customer satisfaction with the program (OP 10-9);
 - Data on vehicle distribution: make/model/year, new vs. used, purchased vs. leased; and,
 - Data on incentive stacking with CARB's EV incentive programs.
- Qualitative Analysis of Implementation Strategy:
 - Programmatic and operational challenges that were encountered and analysis of strategies used to address these challenges;
 - Review of each CBO's involvement in the program, including customer feedback; and,
 - Analysis of outreach strategies used to address and overcome barriers to equitable participation, such as linguistic barriers.
- Key takeaways and learnings from quantitative and qualitative analysis to inform future efforts.

Rate Guidance

Both PG&E and GRID Alternatives will advise Applicants to use PG&E's EV Savings Calculator³ to determine what rate will best fit their anticipated charging habits and choice of electric vehicle. PG&E's EV Savings Calculator is easy to use, accessible for all internet-based applicants, gives results quickly, and provides insights into optimal rates and EV incentive eligibility. Program Participants shall be defaulted on PG&E's EV-2A rate, a time-of-use rate that combines the whole home and vehicle's electricity costs, and may opt out if they desire. Rate selection will be tracked at both the beginning and the end of the program to determine which rate a customer is on and whether it has changed during their participation in the program.

Community Air Protection Program Reporting

Empower EV is open to all income qualified customers throughout PG&E's service area. Since there is no geographic limitation for program reporting, including for CARB's Community Air Protection Program (CAPP) communities, PG&E will not report its data collection metrics separately for these communities. PG&E's metrics will instead highlight significant program findings from throughout the service area, both in monthly data reports and in the final evaluation.

³ Available at <https://ev.pge.com/>.

If a CAPP community is selected as one of the targeted communities, PG&E will work with Empower EV Pilot's Program Implementer, GRID Alternatives, to submit an Advice Letter describing how the data collection metrics may be reported separately for the CAPP community.

Protests

Pursuant to GO 96-B, General Rule 7.51., PG&E request to maintain the original protest and comment period designated in Advice Letter 6606-E and not reopen the protest period.

Effective Date

PG&E requests that this Tier 2 advice submittal become effective concurrent with original Advice Letter 6606-E, which is June 25, 2022.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list. 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



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 E)

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) #: 6606-E-B

Tier Designation: 2

Subject of AL: Second Supplemental: Implementation Details for Empower EV Pilot Program

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.19-09-006

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: 6282-E

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: 6/25/22

No. of tariff sheets: N/A

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 correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

CPUC
Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Clear Form

**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.

Resource Innovations

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
Stoel Rives LLP

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