

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 14, 2023

Advice Letter 6682-E/6682-E-A/6682-E-B

Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street
San Francisco, California 94177
E-mail: PGETariffs@pge.com

SUBJECT: Modifications to Electric Rule 21 and Net Energy Metering Tariffs for Generation Facilities Greater than One Megawatt Interconnecting on Transmission Pursuant to Decision 22-07-001 Ordering Paragraphs 1, 3 and 4

Dear Mr. Dietz:

Pacific Gas and Electric Company Advice Letter 6682-E/6682-E-A/6682-E-B is effective as of February 28, 2023.

Sincerely,

A handwritten signature in cursive script that reads "Leuwam Tesfai".

Leuwam Tesfai
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division
California Public Utilities Commission

February 16, 2023

Advice 6682-E-B

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Second Supplemental: Modifications to Electric Rule 21 and Net Energy Metering Tariffs for Generation Facilities Greater than One Megawatt Interconnecting on Transmission Pursuant to Decision 22-07-001 Ordering Paragraphs 1, 3 and 4.

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits this supplemental Tier 2 Advice Letter (AL) to modify Electric Rule 21 – *Generating Facility Interconnections* – and Net Energy Metering (NEM) Tariffs in compliance with the California Public Utilities Commission (CPUC, Commission) Decision (D.) 22-07-001¹ *Decision Modifying Rule 21 Ordering Paragraphs (OPs) 1, 3 and 4.*

This second AL supplements AL 6682-E and AL 6682-E-A² in part, clarifying sizing criteria for meeting the one megawatt threshold discussed in D. 22-07-001 and removing references to projects on non-CAISO controlled transmission lines to address protests from the California Energy Storage Alliance (CESA) and The Local Government Sustainable Energy Coalition (LGSEC).

Background**Rulemaking (R.) 11-09-011, Decision 12-09-018 and the Settlement Agreement**

On September 22, 2011, the Commission initiated Rulemaking (R.) 11-09-011 to review and, if necessary, revise the rules and regulations governing interconnecting generation and storage resources to the electric distribution systems in Rule 21. The resultant D.12-09-018³ adopted a settlement agreement, reforming Rule 21.

Important to this Advice Letter, D.12-09-018 adopted language in the Applicability subsection B.1 of Rule 21 to “*more clearly state when an applicant may apply for*

¹ [D. 22-07-001](#) – *Decision Modifying Rule 21* - Date of Issuance 7/18/2022

² [PG&E AL 6682-E-A](#) included additional modifications to the Electric Rule 21 Applicability Section B.1, the net energy metering tariffs applicability section and an associated form.

³ [D. 12-09-018](#) – *Decision Adopting Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations – Electric Tariff Rule 21 and Granting Motions to Adopt the Utilities’ Rule 21 Transition Plans*

interconnection pursuant to Rule 21 procedures, as opposed to the California Independent System Operator (CAISO) procedure or the procedures in a utility's [Wholesale Distribution Tariff]"⁴ as follows:

"...Net Energy Metering Generating Facilities and Non-Export Generating Facilities subject to Commission jurisdiction shall interconnect under this Rule [21] regardless of whether they interconnect to Distribution Provider's Distribution or Transmission System."

D.12-09-018 effectively created a pathway for net energy metering systems less than or equal to one megawatt to interconnect to transmission grids through Rule 21.

R. 11-09-011 was subsequently closed in D. 16-06-052 on June 23, 2016.

NEM Successor Rulemaking 14-07-002 and Decision 16-01-044

R. 14-07-002 was filed July 10, 201 to Develop a Successor to Existing Net Energy Metering Tariffs Pursuant to Public Utilities Code Section 2827.1, and to Address Other Issues Related to Net Energy Metering. It resulted in D.16-01-044⁴, which among many other changes, increased the net energy metering generating facility size limit from one-megawatt to effectively, an unlimited size.

2021 Re-opening of Rulemaking 11-09-011

The assigned Administrative Law Judge issued a Ruling on April 7, 2021, which reopened R.11-09-011 because Net Energy Metering and non-export interconnections had raised grid stability issues with respect to two matters:

- 1) an absence of telemetry sharing between Utilities and CAISO; and
- 2) an inability to ensure that the facilities connected to the transmission system are safely configured to meet transmission grid requirements, especially as it relates to inverter programming.

If confirmed, it was noted that D.12-09-018 might need to be modified to remove the Rule 21 Section B.1 exception from CAISO interconnection exception due to concerns relating to the reliability and safety of the grid.

Rulemaking 11-09-011 Decision 22-07-001

On April 23, 2021, various parties filed comments responding to the questions in the April 7, 2021 Ruling.

On September 29, 2021, Energy Division facilitated a workshop to discuss stakeholder perspectives on maintaining transmission interconnection through Rule 21, and potential paths forward.

On November 23, 2021, the Administrative Law Judge issued a Ruling raising additional questions and instructed parties to file comments.

⁴ [Decision 16-01-044](#) - Decision Adopting Successor To Net Energy Metering Tariff - Date of Issuance 2/5/2016

On February 10, 2022, the CAISO filed comments.

On July 18, 2022, D. 22-07-001 was issued.

Advice Letter 6682-E

To address the concerns, the Commission found that an immediate revision of the NEM exception in Section B.1 of Rule 21 was necessary “as there are no viable solutions in the record to address these concerns.”⁵

Based on the this, PG&E noted additional issues may arise as NEM projects seek to interconnect to the transmission system via the CAISO Tariff or Wholesale Distribution Tariff, including metering requirements for NEM projects interconnecting to the transmission system, application of the 1 MW size limit, which types of net energy metering tariffs should be covered, special issues related to NEM aggregation and multiple tariffs, and coordination between the CAISO and Utilities throughout the process to ensure both interconnection and NEM eligibility. PG&E looks forward to working with the CAISO to develop the process further (perhaps at a workshop) and will submit additional tariff changes if necessary.

Accordingly, PG&E submitted this series of advice letters to modify its tariffs pursuant to the following D. 22-07-001 ordering paragraphs:

OP 1. Net Energy Metering generating facilities greater than one megawatt seeking interconnection with a distribution provider’s transmission system shall no longer be exempt from the requirement in Electric Tariff Rule 21 to apply to the California Independent System Operator (CAISO) for interconnection and be subject to the CAISO Tariff. This order is not applicable to net energy metering generating facilities with Permission to Operate letters received as of May 6, 2022, or proposed net energy metering facilities with materially complete interconnection applications submitted as of May 6, 2022.

OP 3. Within 30 days of the issuance of this decision, Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company shall submit a Tier 2 Advice Letter revising Section B.1 of Rule 21 as follows:

All Generating Facilities seeking Interconnection with Distribution Provider’s Transmission System shall apply to the California Independent System Operator (CAISO) for Interconnection and be subject to CAISO Tariff except for i) Net Energy Metering Generating Facilities less than or equal to one megawatt and ii) Generating Facilities that do not export to the grid or sell any exports sent to the grid (Non-Export Generating Facilities). Non-Export Generating Facilities subject to Commission jurisdiction shall interconnect

⁵ D.22-07-001, Finding of Fact 20.

under this Rule regardless of whether they interconnect to Distribution Provider's Distribution or Transmission System.

OP 4. Pacific Gas and Electric Company, San Diego Gas & Electric Company and Southern California Edison Company shall review the language in all related tariffs that could be impacted by the change in Ordering Paragraph 1. Utilities shall include all necessary language revisions for related tariffs in the Tier 2 Advice Letter filing required by Ordering Paragraph 3 above.

Protests to PG&E's AL 6682-E were received from three parties, CESA, LGSEC and Plug Power on September 6, 2022. The protests generally related to the sizing criteria for meeting the one megawatt, inclusion of non-CAISO grid language, and the lack of a process for PG&E customers to apply for NEM2>1MW on transmission, respectively. PG&E submitted a reply on September 13, 2022, and based on the protest, proposed a means for applicants to apply to validate their eligibility under their chosen net energy metering program.

Supplemental Advice Letter 6682-E-A

On September 19, 2022, PG&E submitted Supplemental Advice Letter 6682-E-A. Among its proposed changes, supplemental AL 6682-E-A included clarification of the interconnection requirements on the non-CAISO controlled grid for NEM2>1 MW.

This Supplemental Advice Letter 6682-E-A

Following submission of PG&E's AL 6682-E-A, PG&E conducted discussions with both LGSEC and CESA regarding their protests. PG&E now submits this advice letter to remove one footnote to Section B.1 previously proposed in AL 6682-E-A and modify a footnote to Section B.1 to address sizing criteria for meeting the 1 MW threshold.

Tariff Changes (Blue text are changes introduced in supplemental AL 6682-E-A and green text are changes introduced in this supplemental AL 6672-E-B.)

1) Rule 21

a. Proposed New Transmission Definition in Rule 21 - Withdrawn

PG&E's previous advice letters noted the existing definitions for transmission and then proposed to add a definition for *Transmission System (Non-CAISO Controlled)*. Following discussions with LGSEC, PG&E will now be withdrawing this proposed change in AL 6682-E-B.

b. Section B.1 Applicability:

Pursuant to the direct wording in OP 3 (however, footnotes * and ** are added)⁶:

All Generating Facilities seeking Interconnection with Distribution Provider's Transmission System shall apply to the California Independent System Operator (CAISO) for Interconnection and be subject to CAISO Tariff except for i) Net Energy Metering Generating Facilities **less than or equal to one megawatt*** and ii) Generating Facilities that do not export to the grid or sell any exports sent to the grid (Non-Export Generating Facilities)**. ~~NEM-Generating-Facilities-and~~ Non-Export Generating Facilities subject to Commission jurisdiction shall interconnect under this Rule regardless of whether they interconnect to Distribution Provider's Distribution or Transmission System.

* For purposes of this Applicability section only (i.e., to determine if an Interconnection Request is eligible for interconnection under Rule 21), in order for an exporting Generating Facility to be considered less than or equal to one megawatt, it must either (a) have an aggregate gross nameplate rating of less than or equal to one megawatt or (b) use a Certified Power Control System to limit the amount of export to less than or equal to one megawatt. Net Energy Metering Generating Facilities with Permission to Operate letters received as of May 6, 2022, or proposed Net Energy Metering Generating Facilities with materially complete interconnection applications submitted as of May 6, 2022, need not apply to CAISO.

** Net Energy Metering Generating Facilities greater than 1MW interconnecting on the Transmission System that are configured to not export to the grid qualify as Non-Export Generating Facilities provided that they employ an option listed in Rule 21 Screen i when the answer to "Will power be exported across the PCC?" is "no".

Protests

Pursuant to GO 96-B, General Rule 7.5.1., PG&E request to maintain the original protest and comment period designated in Advice Letter 6682-E and not reopen the protest period.

Effective Date

Pursuant to D.22-07-001 OP 3, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, March 18, 2023, which is 30 calendar days after the date of submittal.

⁶ PG&E AL 6682-E-A

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 and the parties on the service list for R. 11-09-011. 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

cc: Service List R.11-09-011

Attachments:

Attachment 1 – Clean version of updated Tariff

Attachment 2 – Redline Tariff Revisions



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: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@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) #: 6682-E-B

Tier Designation: 2

Subject of AL: Second Supplemental: Modifications to Electric Rule 21 and Net Energy Metering Tariffs for Generation Facilities Greater than One Megawatt Interconnecting on Transmission Pursuant to Decision 22-07-001 Ordering Paragraphs 1, 3 and 4

Keywords (choose from CPUC listing): Compliance, Rule 21

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.22-07-001

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: 3/18/23

No. of tariff sheets: 4

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: 6635-E-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:
Facsimile (xxx) xxx-xxxx:
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

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
55534-E	ELECTRIC RULE NO. 21 GENERATING FACILITY INTERCONNECTIONS Sheet 15	42312-E
55535-E	ELECTRIC RULE NO. 21 GENERATING FACILITY INTERCONNECTIONS Sheet 34	42330-E
55536-E	ELECTRIC TABLE OF CONTENTS Sheet 1	55103-E
55537-E	ELECTRIC TABLE OF CONTENTS Sheet 20	54834-E



ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

Sheet 15

B. APPLICABILITY

1. APPLICABILITY

This Rule describes the Interconnection, operating and Metering requirements for those Generating Facilities to be connected to Distribution Provider’s Distribution System and Transmission System over which the California Public Utilities Commission (Commission) has jurisdiction. All Generating Facilities seeking Interconnection with Distribution Provider’s Transmission System shall apply to the California Independent System Operator (CAISO) for Interconnection and be subject to CAISO Tariff except for i) Net Energy Metering Generating Facilities less than or equal to one megawatt* and ii) Generating Facilities that do not export to the grid or sell any exports sent to the grid (Non-Export Generating Facilities)**. Non-Export Generating Facilities subject to Commission jurisdiction shall interconnect under this Rule regardless of whether they interconnect to Distribution Provider’s Distribution or Transmission System. Subject to the requirements of this Rule, Distribution Provider will allow the Interconnection of Generating Facilities with its Distribution or Transmission System.

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* For purposes of this Applicability section only (i.e., to determine if an Interconnection Request is eligible for interconnection under Rule 21), in order for an exporting Generating Facility to be considered less than or equal to one megawatt, it must either (a) have an aggregate gross nameplate rating of less than or equal to one megawatt or (b) use a Certified Power Control System to limit the amount of export to less than or equal to one megawatt. Net Energy Metering Generating Facilities with Permission to Operate letters received as of May 6, 2022, or proposed Net Energy Metering Generating Facilities with materially complete interconnection applications submitted as of May 6, 2022, need not apply to CAISO.

** Net Energy Metering Generating Facilities > 1MW interconnecting on the Transmission System that are configured to not export to the grid qualify as Non-Export Generating Facilities provided that they employ an option listed in Rule 21 Screen i when the answer to “Will power be exported across the PCC?” is “no”.

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ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

Sheet 34

C. DEFINITIONS (Cont'd.)

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Spot Network: For purposes of this Rule, a Spot Network is a type of distribution system found within modern commercial buildings to provide high reliability of service to a single customer.

Starting Voltage Drop: The percentage voltage drop at a specified point resulting from In-rush Current. The Starting Voltage Drop can also be expressed in volts on a particular base voltage, (e.g. 6 volts on a 120-volt base, yielding a 5% drop).

Supplemental Review: See Section F.2.c.

System Integrity: The condition under which Distribution Provider's Distribution and Transmission System is deemed safe and can reliably perform its intended functions in accordance with the safety and reliability rules of Distribution Provider.

Telemetry: The electrical or electronic transmittal of Metering data on a real-time basis to Distribution Provider.

Total Capacity: Capacity (in MW) of substation/area bus, bank or circuit based on normal or operating ratings.

Transfer Trip: A Protective Function that trips a Generating Facility remotely by means of an automated communications link controlled by Distribution Provider.

Transient/Dynamic Stability: The ability of an electrical system to withstand disturbances. Transient/Dynamic Stability studies are performed to ensure power system stability and are time-based simulations that assess the performance of the power system during and shortly following system disturbances.

Transmission Cluster Study Process: The cluster study process as defined in Distribution Provider's Wholesale Distribution Tariff.

Transmission System: Transmission facilities owned by Distribution Provider that have been placed under the CAISO's operational control and are part of the CAISO Controlled Grid, as defined in the CAISO Tariff.

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ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

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Preliminary Statements, Rules.....		55105-E	
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Maps, Contracts and Deviations.....		37960-E	
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(Continued)

Advice 6682-E-B
Decision D.22-07-001

Issued by
Meredith Allen
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

February 16, 2023

Attachment 2

Redline Tariff Revisions

These redline revisions only include modified sheets that have language changes in this advice letter (AL 6682-E-B). Where Electric Rule 21 has been revised, the affected sheets are included in Attachment 1.

Redline Text Color	Advice Letter	Subject	Comments
	6682-E-A	Supplemental: Modifications to Electric Rule 21 and Net Energy Metering Tariffs for Generation Facilities Greater than One Megawatt Interconnecting on Transmission Pursuant to Decision 22-07-001 Ordering Paragraphs 1, 3 and 4.	In this advice letter, revisions are made pursuant to Decisions 22-07-001 Ordering Paragraphs 1, 3, and 4
	6682-E-B	Second Supplemental: Modifications to Electric Rule 21 and Net Energy Metering Tariffs for Generation Facilities Greater than One Megawatt Interconnecting on Transmission Pursuant to Decision 22-07-001 Ordering Paragraphs 1, 3 and 4.	In this advice letter, revisions are made to clarify sizing criteria and to remove references to projects on non-CAISO controlled transmission lines.



ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

Sheet 15

*** Net Energy Metering Generating Facilities > 1MW interconnecting on the Transmission System that are configured to not export to the grid qualify as Non-Export Generating Facilities provided that they employ an option listed in Rule 21 Screen i when the answer to "Will power be exported across the PCC?" is "no".

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<i>Advice</i>	5187-E-A	<i>Issued by</i>	<i>Date Filed</i>	May 31, 2018
<i>Decision</i>	16-06-052	Robert S. Kenney	<i>Effective</i>	June 30, 2018
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	



ELECTRIC RULE NO. 21
GENERATING FACILITY INTERCONNECTIONS

Sheet 33

C. DEFINITIONS (Cont'd.)

Spot Network: For purposes of this Rule, a Spot Network is a type of distribution system found within modern commercial buildings to provide high reliability of service to a single customer.

Starting Voltage Drop: The percentage voltage drop at a specified point resulting from In-rush Current. The Starting Voltage Drop can also be expressed in volts on a particular base voltage, (e.g. 6 volts on a 120-volt base, yielding a 5% drop).

Supplemental Review: See Section F.2.c.

System Integrity: The condition under which Distribution Provider's Distribution and Transmission System is deemed safe and can reliably perform its intended functions in accordance with the safety and reliability rules of Distribution Provider.

Telemetry: The electrical or electronic transmittal of Metering data on a real-time basis to Distribution Provider.

Total Capacity: Capacity (in MW) of substation/area bus, bank or circuit based on normal or operating ratings.

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Transient/Dynamic Stability: The ability of an electrical system to withstand disturbances. Transient/Dynamic Stability studies are performed to ensure power system stability and are time-based simulations that assess the performance of the power system during and shortly following system disturbances.

Transmission Cluster Study Process: The cluster study process as defined in Distribution Provider's Wholesale Distribution Tariff.

Transmission System: Transmission facilities owned by Distribution Provider that have been placed under the CAISO's operational control and are part of the CAISO Controlled Grid, as defined in the CAISO Tariff.

~~Transmission System (Non-CAISO Controlled: Those non-ISO transmission voltage facilities (as defined in Electric Rule 2 Table B.1) owned, controlled, and operated by PG&E that are used to provide Distribution Service under these tariffs.~~

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Advice	5187-E-A	Issued by	Date Filed	May 31, 2018
Decision	16-06-052	Robert S. Kenney	Effective	June 30, 2018
		Vice President, Regulatory Affairs	Resolution	

**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 Blaising 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
Downey Brand LLP
Dish Wireless L.L.C.

East Bay Community Energy Ellison
Schneider & Harris LLP
Engineers and Scientists of California

GenOn Energy, Inc.
Green Power Institute
Hanna & Morton
ICF

iCommLaw
International Power Technology
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin
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