

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6711E
As of December 13, 2022

Subject: Amendments to Mid-Term Reliability Contracts approved in Advice Letter 6477-E

Division Assigned: Energy

Date Filed: 09-23-2022

Date to Calendar: 09-28-2022

Authorizing Documents: D2106035

Disposition:

Signed

Effective Date:

12-01-2022

Resolution Required: Yes

Resolution Number: E-5243

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

(415)973-4587

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

September 23, 2022

Advice 6711-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Amendments to Mid-Term Reliability Contracts approved in Advice
Letter 6477-E**

I. Purpose

Pursuant to Decision (D.) 21-06-035, Pacific Gas and Electric Company (PG&E or the Utility) requests approval of amendments to transactions resulting from PG&E's 2021 Mid-Term Reliability Request for Offers – Phase 1 (MTR RFO – Phase 1) that were presented in Advice Letter 6477-E and approved by the California Public Utilities Commission (Commission or CPUC) in Resolution E-5202 on April 21, 2022.

The contract amendments included in this Advice Letter are necessary for PG&E to continue to make progress to meet the June 1, 2024, incremental September Net Qualifying Capacity (NQC) procurement requirements mandated in D.21-06-035. For the reasons described herein, the amendments presented by this advice letter are reasonable and in the interest of customers, and thus should be approved.

Time is of the essence for the approval of these amendments; accordingly, PG&E respectfully requests that the Commission issue a final resolution approving this Tier 3 Advice Letter by no later than December 12, 2022 which is 80 days from the date of submittal of this Advice Letter. This timeline will provide certainty to PG&E and the counterparties to the agreement going forward as to whether the amendments can become effective to enable the timely development of the projects to meet their expected in operation dates.

II. Background

On June 30, 2021, the Commission issued D.21-06-035, which takes a number of steps to address the mid-term reliability needs of the electricity system within the California Independent System Operator Corporation's (CAISO) operating system beginning in 2023 due to the pending retirement of the Diablo Canyon Power Plant and the planned retirement of once-through-cooling (OTC) thermal plants in Southern California. In D.21-

06-035, the Commission requires incremental procurement of 11,500 MWs of additional NQC resources, of which PG&E is responsible for 2,302 MWs for its bundled service customer portion. Further, the procurement required by D.21-06-035 are expected to deliver at least 2,000 MW to be online by August 1, 2023, an additional 6,000 MW by June 1, 2024, an additional 1,500 MW by June 1, 2025, and an additional 2,000 MW by June 1, 2026. In addition, D.21-06-035 requires that at least 2,500 MW of the resources procured by the LSEs collectively, between 2023 and 2025, be from zero-emission resources that generate electricity, or generation resources paired with storage, or demand response, to replace the current supply of energy from the Diablo Canyon Power Plant and ensure there is no resultant increase in GHG emissions upon its retirement.

Additionally, D. 21-06-035 and subsequent Energy Division memorandum provide guidance for incremental effective load carrying capacity (ELCC) values to use for mid-term reliability procurement compliance,¹ affirms that the investor-owned utilities (IOU) are to continue to act as the backstop procurement agent under the framework adopted in D.20-12-044 for Community Choice Aggregators (CCAs) and Energy Service Providers (ESPs) that fail to meet their procurement responsibilities of incremental system resources under the D. 21-06-035.

D. 21-06-035 outlined eligibility requirements for resources to meet the procurement obligations and requirements for the solicitation, including types of resources eligible (e.g., eligibility of imports) and minimum contract lengths.

In accordance with D. 21-06-035, PG&E executed nine agreements for a total of 1,598.7 MW of nameplate capacity. PG&E sought approval of those contracts on January 1, 2022, which the Commission approved on April 21, 2022.²

Since the contracts were executed, the counterparties to the contracts approached PG&E expressing concerns regarding unprecedented changed market conditions which renders the project uneconomical. The counterparties have indicated that they are unable to complete the projects pursuant to the terms and conditions of the contracts. The parties requested amendments to their contracts to allow them to complete the projects which when developed will contribute to system reliability. The changes to market conditions, and the resulting amendments are described below.

A. Negotiation Background

Since the agreements were executed in 2021, there has been unprecedented industry-wide market changes and inflationary pressure on project costs. The counterparties

¹ Energy Division staff e-mailed parties on October 22, 2021, with an updated Incremental ELCC Study for Mid-term Reliability Procurement, by E3 and Astrapé. The materials can be found on [IRP Procurement Track \(ca.gov\)](https://www.cpuc.ca.gov/IRP/ProcurementTrack)

² CPUC Res. E-5202

requested a price increase in order for the project to remain viable. The main drivers cited for the increased costs include:

- Battery prices have risen significantly due to dramatic increases in commodity prices for lithium carbonate and metals used in manufacturing lithium-ion batteries; this impacts both initial construction cost and ongoing augmentation costs to maintain capacity;
- Continued supply chain constraints;
- Balance of systems costs have been increasing due to high inflation affecting materials and labor costs; and
- Cost of capital has been increasing as the Federal Reserve has been raising interest rates to combat inflation.

Absent the price increase, the counterparty has expressed that it would not be able to build the project, and the counterparty would default under the contract resulting in termination of the agreement and failure of the project. In considering the amendments, PG&E has negotiated aggressively with the counterparties with respect to the price increase, and has conducted due diligence on the proposed price increase, assessing what kind of mitigation actions the counterparty has taken and how much of the burden is being passed to the Utility. In addition, the Utility has issued its Midterm Reliability Request for Offers (MTR RFO) – Phase 2 and the proposed price increases are competitive with the current market prices and quantity of megawatts available in the MTR RFO. Attachment A further describes the negotiations process.

In addition, prior to final agreement on the price increase negotiations another industry-wide event occurred that impacted pricing – the Inflation Reduction Act (IRA) enacted by the United States Congress on August 16, 2022. The IRA provided for an investment tax credit (ITC) for standalone energy storage projects. The ITC acts to lower the capital cost of equipment, therefore the overall project costs. The resulting contract price adjustment contained in the contract amendments represents such ITC benefit sharing among the Utility and the counterparties to the agreements.

B. SUMMARY OF AMENDED CONTRACTS

The amended contracts are as follows:

	Technology	Initial Delivery Date	Term (Years)	Nameplate Size (MW)
Terra-Gen Canyon Country ESS I, LLC ("Canyon Country")	Lithium Ion Batteries	6/1/2024	15	80
Terra-Gen Beaumont ESS I, LLC ("Beaumont")	Lithium Ion Batteries	6/1/2024	15	100
Poblano Energy Storage, LLC ("Inland Empire")	Lithium Ion Batteries	6/1/2024	15	50
Nighthawk Energy Storage, LLC (Nighthawk Storage)	Lithium Ion Batteries	6/1/2024	15	300

Of these contracts, Canyon Country, Beaumont, and Inland Empire reflect changed initial delivery dates to June 1, 2024 (from October 1, 2023, August 1, 2023, and April 1, 2024, respectively), which will enable these contracts to still count toward PG&E's D. 21-06-035 2024 compliance requirements. Additionally, as discussed in Attachment A, Inland Empire's project capacity changed from 100 MW to 50 MW. Finally, PG&E has included provisions to clarify that the projects are able to discharge for 8 consecutive hours. Including this provision enables PG&E to retain flexibility in which procurement category the resources will count and enable meeting goals at least cost.

See confidential Attachment A for a description of the Amendments.

III. Procurement Review Group/Cost Allocation Mechanism

PG&E notified the Procurement Review Group about the amendments on June 29, 2022.

IV. Request for Expedited Commission Approval

PG&E requests that the Commission issue a final resolution no later than 80 days from the submittal of this Advice Letter and approve the amendments to the contracts presented in this Advice Letter without modification.

The projects continued development is important in meeting the system needs identified in the Decision.

Sellers of each project have expressed concern regarding the schedule to effectuate the amendments in order to continue development progress to meet the online dates for each projects.

Accordingly, time is of the essence for timely achievement of the online dates for these projects. Expedited approval is requested for PG&E to meet its regulatory compliance commitments, bring capacity online timely to meet state reliability needs and facilitates a timely process for the Seller to initiate work to deliver the project in time.

V. Confidentiality Treatment

In support of this advice letter, PG&E has provided the confidential information listed below. This information is being submitted in the manner directed by Decision (D.) 08-04-023 establishing procedures for complying with D.06-06-066 to demonstrate the confidentiality of the material and to invoke the protection of confidential utility information provided under Public Utilities Code section 454.5(g) or the Investor Owned Utility Matrix, Appendix 1 of D.06-06-066 and Appendix C of D.08-04-023. The Declaration of Don Howerton seeking confidential treatment of confidential materials provided herein is being submitted concurrently with this advice letter.

Confidential Appendices

- Appendix A: Key Aspects to the Amendments
- Appendix B: Beaumont ESS I, LLC – Beaumont Energy Storage Project (LT RAA w/ES) Amendment
- Appendix C: Canyon Country ESS I, LLC – Canyon Country Energy Storage Project (LT RAA w/ES) Amendment
- Appendix D: Poblano Energy Storage, LLC – Inland Empire Energy Storage (LT RAA w/ES) Amendment
- Appendix E: Nighthawk Energy Storage, LLC – Nighthawk Storage (LT RAA w/ES) Amendment

VI. Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than October 13, 2022, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name and e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

VII. Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.3, this advice letter is submitted with a Tier 3 designation. PG&E requests that this advice letter become effective upon Commission approval.

VIII. 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.20-05-003. 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.20-05-003
Nick Dahlberg – Energy Division

Attachments



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) #: 6711-E

Tier Designation: 3

Subject of AL: Amendments to Mid-Term Reliability Contracts approved in Advice Letter 6477-E

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.21-06-035

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: See Confidentiality Declaration and Matrix
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: Don Howerton, Don.Howerton@pge.com

Resolution required? ☒ Yes ☐ No

Requested effective date:

No. of tariff sheets: 0

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:
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

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**PACIFIC GAS AND ELECTRIC COMPANY
ADVICE LETTER FOR APPROVAL OF AMENDMENT TO
CONTRACTS RESULTING FROM ITS MID-TERM
RELIABILITY - PHASE 1 REQUEST FOR OFFERS
PURSUANT TO DECISION 21-06-035 & DECISION 21-12-
015**

**DECLARATION OF DON HOWERTON
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION
CONTAINED IN PG&E'S ADVICE LETTER**

I, Don Howerton, declare:

1. I am a Director in the Energy Procurement and Policy Organization at Pacific Gas and Electric Company (PG&E). In this position, I am responsible for procurement of various electric resources and products including energy storage and renewable energy. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information.

2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain data and information contained in PG&E's Advice Letter amending contracts pursuant to Decision 21-06-035 and Decision 21-12-015.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential market sensitive data and information covered by D.06-06-066, Appendix 1, and Public Utilities Code §454.5(G). The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text that is pertinent to my testimony in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on September 23, 2022 at San Francisco, California.

/s/

Don Howerton

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

**ADVICE LETTER FOR APPROVAL OF AMENDMENTS TO CONTRACTS RESULTING FROM ITS
MID-TERM RELIABILITY REQUEST FOR OFFERS – PHASE 1 PURSUANT TO DECISION 21-06-035 and
DECISION 21-12-015**

September 23, 2022

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To	PG&E's Justification for Confidential Treatment	Length of Time
Confidential Appendices			
Appendix A: Key Aspects to the Amendments to Mid-Term Reliability Contracts approved in Advice Letter 6477-E	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS)).	The terms of the Long-Term Resource Adequacy Agreement with Energy Settlement (LTRA w/ES) presented in this appendix are generally confidential. The terms of this contract that are public pursuant to Item VII. B. are publicly disclosed in Section IV. Selected Projects.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.
Appendix B: Beaumont ESS I, LLC – Beaumont Energy Storage Project (LT RAA w/ES) Agreement	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS)).	The terms of the Long-Term Resource Adequacy Agreement with Energy Settlement (LTRA w/ES) presented in this appendix are generally confidential. The terms of this contract that are public pursuant to Item VII. B. are publicly disclosed in Section IV. Selected Projects.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

**ADVICE LETTER FOR APPROVAL OF AMENDMENTS TO CONTRACTS RESULTING FROM ITS
MID-TERM RELIABILITY REQUEST FOR OFFERS – PHASE 1 PURSUANT TO DECISION 21-06-035 and
DECISION 21-12-015
September 23, 2022**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To	PG&E's Justification for Confidential Treatment	Length of Time
Appendix C: Canyon Country ESS I, LLC – Canyon Country Energy Storage Project (LT RAA w/ES) Agreement	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS)).	The terms of the Long-Term Resource Adequacy Agreement with Energy Settlement (LTRA w/ES) presented in this appendix are generally confidential. The terms of this contract that are public pursuant to Item VII. B. are publicly disclosed in Section IV. Selected Projects.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.
Appendix D: Poblano Energy Storage, LLC – Inland Empire Energy Storage (LT RAA w/ES) Agreement	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS)).	The terms of the Long-Term Resource Adequacy Agreement with Energy Settlement (LTRA w/ES) presented in this appendix are generally confidential. The terms of this contract that are public pursuant to Item VII. B. are publicly disclosed in Section IV. Selected Projects.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.
Appendix E: Nighthawk Energy Storage, LLC – Nighthawk Storage (LT RAA w/ES) Agreement	Item VII.B (Contracts and Power Purchase Agreements between utilities and non-Affiliated Third Parties (except RPS)).	The terms of the Long-Term Resource Adequacy Agreement with Energy Settlement (LTRA w/ES) presented in this appendix are generally confidential. The terms of this contract that are public pursuant to Item VII. B. are publicly disclosed in Section IV. Selected Projects.	Contract documents and terms of contracts are confidential for three years from the date that the contract states that deliveries are to begin, or until one year following expiration, whichever comes first.

PACIFIC GAS AND ELECTRIC COMPANY

Appendix A

Key Aspects to the Amendments

(Confidential)

PACIFIC GAS AND ELECTRIC COMPANY

Appendix B

**Beaumont ESS I, LLC – Beaumont Energy Storage Project
(LT RAA w/ES) Amendment**

(Confidential)

PACIFIC GAS AND ELECTRIC COMPANY

Appendix C

**Canyon Country ESS I, LLC – Canyon Country Energy Storage Project
(LT RAA w/ES) Amendment**

(Confidential)

PACIFIC GAS AND ELECTRIC COMPANY

Appendix D

**Poblano Energy Storage, LLC – Inland Empire Energy Storage (LT
RAA w/ES) Amendment**

(Confidential)

PACIFIC GAS AND ELECTRIC COMPANY

Appendix E

**Nighthawk Energy Storage, LLC – Nighthawk Storage (LT RAA w/ES)
Amendment**

(Confidential)

**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

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