

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



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 6816E**  
**As of April 2, 2024**

Subject: Advice Letter Complying with Resolution E-5211 and Decision 20-09-035 Ordering Paragraph 16

Division Assigned: Energy

Date Filed: 01-09-2023

Date to Calendar: 01-20-2023

Authorizing Documents: D2009035

Authorizing Documents: E-5211

<b>Disposition:</b>	<b>Signed</b>
<b>Effective Date:</b>	<b>03-21-2024</b>

Resolution Required: Yes

Resolution Number: E-5296

Commission Meeting Date: 03-21-2024

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**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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto:edtariffunit@cpuc.ca.gov)**



**Connor Flanigan.**  
Managing Director, State Regulatory  
Operations

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January 23, 2023

**Advice 4941-E-A**  
(Southern California Edison Company ID U 338 E)

**Advice 6816-E-A**  
(Pacific Gas and Electric Company ID U 39 E)

**Advice 4138-E-A**  
(San Diego Gas and Electric Company ID U 902 E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA  
ENERGY DIVISION

**SUBJECT:** Supplement to Joint Advice 4941-E, Advice Letter Complying  
with Resolution E-5211 and Decision 20-09-035 Ordering  
Paragraph 16

**PURPOSE**

Southern California Edison Company (SCE), on behalf of Pacific Gas and Electric Company (PG&E) and San Diego Gas & Electric Company (SDG&E) (collectively, the Utilities), hereby submits this Supplemental Advice Letter (Supplemental AL) to provide a response to the counter proposal included as Attachment A of the Utilities' January 9, 2023 Advice Letter, SCE Advice 4941-E.

The Utilities are submitting this Supplemental AL in accordance with General Order (GO) 96-B, General Rule 7.5.1. This advice letter supplements Advice 4941-E in part.

## **BACKGROUND**

On January 9, 2023, the Utilities submitted Advice 4941-E to comply with Ordering Paragraph 3 of Resolution E-5211. Advice 4941-E included an Attachment A, "Proposal for Resolution of Decision 20-09-035 Ordering Paragraph 16 (pursuant to Resolution E-5211)" submitted on behalf of Interstate Renewable Energy Council, Inc. (IREC), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), the California Solar and Storage Association (CALSSA), and Applied Systems Engineering Inc. (collectively, Alternate Proposal Parties).

The Utilities explained the following in Advice 4941-E:

*During the LGP Workshop #3 on December 16, 2022, the Interstate Renewable Energy Council (IREC) made a request to prepare alternative proposals, which would be appended to the Utilities' AL. Per Energy Division direction, the referenced alternative proposal was provided to the Utilities on January 5, 2023 on behalf of IREC, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), the California Solar and Storage Association (CALSSA), and Applied Systems Engineering Inc. The alternative proposal is attached to this AL as Attachment A. The Utilities are attaching the alternative proposal to this AL per Energy Division's direction, and by doing so do not adopt or endorse its recommendations. The Utilities have not had sufficient time to review the alternative proposal in depth and, in this AL, do not provide a formal response to it. The Utilities understand they will have the opportunity to offer comments later in the AL process.*

As noted in the explanation, the Utilities are herein offering comments on Attachment A (the Alternate Proposal).

## **DISCUSSION**

### **1. Project Developers Utilizing a Limited Generation Profile Face Some Risk of Curtailment as Permitted by D.20-09-035**

The Alternate Proposal Parties assert that Limited Generation Profile (LGP) projects would be unfinanceable if the Utilities can reduce a customer's LGP to the minimum ICA-SG in effect at time of interconnection for an indefinite time period. But the Alternate Proposal Parties have not demonstrated that this is the case and, in any event, the financial risk associated with LGP projects should not be shifted to ratepayers given that Decision ("D.") 20-09-035 (the Decision) expressly permits such reductions.

First, all parties agree that there is no additional risk of curtailment to an LGP customer as compared to a non-LGP customer for emergency conditions. The Utilities' ability to curtail generation as necessary to address emergency conditions is set forth in Rule 21, Section D.9. The Utilities have broad powers (and attendant responsibilities) to manage the grid in a safe and reliable manner. Unless otherwise provided by Commission

order, good utility practice dictates that Utilities take the reasonable actions to return curtailed generation to the level authorized by the customer's interconnection agreement. The Utilities believe that all parties, including the Alternate Proposal Parties, understand that any entity contemplating new Behind-The-Meter (BTM) generation must assess the likelihood, possible duration, and financial consequences of emergency curtailments. After considering the risks of emergency curtailments, many entities are willing to move forward with their BTM generation projects.

At issue here is whether the Decision—which does not require the utility to return curtailed generation to the LGP levels authorized by the customer's interconnection agreement, but which does require the utility to return the curtailed generation to at least the minimum ICA-SG level in effect at time of interconnection—creates an incremental risk that renders LGP projects unfinanceable. As the Utilities explained during the workshops, the likelihood of extended curtailments of LGP projects is low. Utilities will initially consider low-cost measures that have the ability to restore an LGP customer's export level to at least the minimum ICA-SG level in effect at time of interconnection. If these measures are not sufficient to achieve the minimum ICA-SG level, the Utilities will undertake upgrades, at ratepayer expense, that will return the LGP customer's export level to at least the minimum ICA-SG level.<sup>1</sup>

Aside from NEM projects under 1 MW, the LGP option provides customers contemplating the addition of generation with an important benefit not available to non-LGP customers; it allows the customer to interconnect its generator without triggering upgrades and the associated cost responsibility. Non-LGP customers, on the other hand, are obliged to pay for upgrades that the interconnection process determines are needed. The extent to which the benefits of the LGP option are eroded by the possibility that unforeseen changes in grid conditions could require export curtailments that are as low as the minimum ICA-SG in effect at time of interconnection is uncertain. However, the Alternate Proposal Parties have neither demonstrated that uncertainty renders projects unfinanceable nor that ratepayers would be better off if they were required to pay for upgrades that restored curtailed LGPs to the levels included in the LGP customers' interconnection agreements (as discussed further below).<sup>2</sup>

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<sup>1</sup> If the upgrades do not restore the export level to the levels included in the LGP customer's interconnection agreement, the LGP customer can request that the utility identify and construct the upgrades that would restore exports to those levels. The LGP customer, not ratepayers, would be responsible for the associated costs. The scope of the required upgrades will depend on the circumstances that gave rise to the curtailment in the first instance. If the cause was an unexpected departure of a small amount of load, the scope of the upgrades that would restore the LGP levels to those in the interconnection agreement may likewise be small and the associated costs low.

<sup>2</sup> The Alternate Proposal Parties state that “[t]he IOUs’ proposal eradicates...certainty by empowering the IOUs to unilaterally and permanently remove the additional export capacity due to factors outside of the applicant’s control.” (Attachment A at p. 4.) However, these

The Alternate Proposal Parties suggest that an LGP customer should be treated identically to a non-LGP customer when curtailments are needed to preserve grid safety and/or reliability. Additionally, the Alternate Proposal Parties would require the Utilities to identify and construct, at ratepayer expense, the upgrades necessary to return the LGP customer's exports to the levels that are specified in the LGP customer's interconnection agreement.<sup>3</sup> In effect, the Alternate Proposal Parties would transfer cost risks from LGP customers to ratepayers in violation of the ratepayer protections that the Utilities believe the Decision provides.

As such, given the unjustifiable cost shift to ratepayers that would result from the adoption of the Alternate Proposal, the Commission should reaffirm the Decision and allow the IOUs to reduce the LGP projects to the lowest ICA-SG value at the time of application if necessary to ensure safe and reliable service without grid upgrades.

## **2. The Alternate Proposal Parties Have Not Demonstrated the Benefits of Financing Upgrades for LGP Projects to Ratepayers**

The Alternate Proposal Parties argue that enabling LGP projects to maintain the level of export set forth in their interconnection agreements regardless of future grid conditions at ratepayers' expense benefits society and ratepayers, but have not provided any data to substantiate their claim. Additionally, this assertion ignores the potential cost to ratepayers, as LGP projects introduce the added risk of triggering upgrades at ratepayers' expense after execution of an interconnection agreement. The upgrades that may be required to restore a curtailed LGP project to the minimum ICA-SG level would likely not be needed had the customer requested interconnection under the historical interconnection process. Interconnection agreements have historically "locked down" the scope, cost, and construction schedule for upgrades. The LGP option creates the opportunity for LGP customers to shift future upgrade costs to ratepayers. It is not in ratepayers' interest to expand the potential for cost shifts beyond what the Commission decision already allows. The Utilities see most of the benefits of the Alternate Proposal accruing to project developers, not ratepayers.

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factors (e.g., an unexpected reduction in load) are also outside of the Utility's control. It does not automatically follow that ratepayers should be forced to bear these risks. The Utilities maintain that this is a normal business risk that commercially-motivated developers should consider.

<sup>3</sup> "...[S]hould circumstances arise where the distribution system requires modifications in order to address long-term system issues (i.e., violations of voltage thresholds, equipment ratings, etc.) that are triggered by changes in load, the IOUs shall treat the issue as it would were no LGP projects present: make any mitigations or system modifications necessary to resolve the issue and recover costs via its rate case." Attachment A at p. 5.

### 3. The Alternate Proposal's Requests for Data Are Burdensome and Unsupported by the Decision

The Alternate Proposal Parties state that “there has been no meaningful data presented to demonstrate that it is necessary to expose LGP customers to [LGP curtailments of unlimited duration] or that LGP interconnections pose greater risk than non-LGP interconnections.”<sup>4</sup> The Utilities do not believe it is necessary to provide data to “demonstrate” that LGP customers should be subject to LGP curtailments (which are bounded by the minimum ICA-SG in effect at the time of interconnection) of potentially unlimited duration. LGP curtailments of potentially unlimited duration are allowed by the Decision. Similarly, data comparing the relative risks of LGP and non-LGP projects is not necessary given that the Commission has already determined that such curtailments are permitted.<sup>5</sup>

The Alternate Proposal not only requires ratepayers to fund upgrades necessary to restore LGP projects to the initial export levels allowed in their LGP, but also provides that the Utilities should be required to track data to allow the Commission to “revisit its policy regarding distribution upgrades caused by reductions in load with more information in the future.”<sup>6</sup> Specifically, the Alternate Proposal provides that the Utilities “should each track and tally the number of mitigations or modifications that it determines could have been avoided by curtailing an LGP project down to the lowest ICA-SG.” When the Utility “has recorded ten such events,” the Utility would file a Tier 1 advice letter, which would initiate a stakeholder process culminating in the Commission deciding whether to make changes “to how LGP projects are interconnected or how the costs associated with subsequent mitigations or modifications are managed.”<sup>7</sup> But the Commission already issued a Decision permitting curtailment to the lowest ICA-SG after an extensive working group process. Accordingly, it is not clear that there is any basis for imposing extensive reporting requirements, through an Advice Letter process or otherwise.

Moreover, certain of the specific data elements that the Alternate Proposal would require the Utilities to collect are burdensome. The Alternate Proposal states that the Utilities “should be required to track and provide documentation of all mitigations or system modifications that it believes are necessary due to reductions in load (regardless

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<sup>4</sup> Attachment A at p. 4.

<sup>5</sup> LGP customers may export power up to the limit provided by the ICA-SG. ICA-OF limits are not considered, so it is reasonable to assume that accommodating LGP customers is, all things being equal, more risky than accommodating non-LGP customers where operational flexibility is accounted for.

<sup>6</sup> Attachment A at p. 5.

<sup>7</sup> Attachment A at p. 6.

of whether an LGP project exists or not).<sup>8</sup> Specifically the Alternate Proposal requires the following documentation:<sup>9</sup>

- How the IOU identified the need for mitigations or modifications. This shall include both a record of how the IOU first became aware of the problematic conditions on the system, as well as how it determined that condition arose due to a reduction in load (including data to support this conclusion). This data should be tracked and reported for all mitigations or modifications that the IOU determines are due to loss of load.
- The cost of the mitigation or modification.
- How long it took from identification of the condition to implementation of the mitigation or modification.
- Details on all the projects interconnected to the circuit at the time the condition arose, including their nameplate capacity, export capacity, and fuel type.
- Where one of these conditions arises, and there is an LGP project interconnected to the circuit, the IOU shall also document:
  - Whether curtailment of the LGP project down to the minimum ICA-SG would have avoided the need for the mitigation or modification and provide supporting data for that assertion.
  - Information on the LGP project, including the project's fuel source (i.e., solar, solar+storage, etc.), nameplate capacity, production profile and whether it is a front of the meter or behind the meter installation.
  - Whether any other projects have interconnected to the circuit subsequent to the LGP project(s) (and if so, details about those projects and whether any upgrades were completed to facilitate their interconnection).
  - The load profile in existence at the time the LGP project applied for interconnection and the load profile at the time the condition requiring mitigation or modification was identified.
- A summary of feeders by number of interconnections, including at least:
  - The number of feeders with LGP interconnections.
  - The number of feeders with non-LGP interconnections.
  - The number of feeders with both LGP interconnections and non-LGP interconnections.

The systems needed to track much of the information above would likely need to be built from scratch and would require considerable time and monetary expense. One significant challenge will be that the event or condition leading to the "mitigation or modification" will likely not be known in advance; therefore, there is no way to know when the historical circuit data should be collected and preserved. As such, tracking such events would require continual collection and preservation of circuit data.

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<sup>8</sup> Attachment A at p. 5.

<sup>9</sup> Attachment A at pp. 5-6.

Likewise, the Utilities would have to design and test a process to determine whether the hypothetical curtailment of an LGP project to the minimum ICA-SG in effect at the time of interconnection “would have avoided the need for mitigation or modification.” This process would presumably require the utility to save and time-stamp detailed historical circuit data and perform power flow analysis on this data assuming a lower level of export from the LGP customer. Depending on the number of data points that must be collected and saved, the Information Technology requirements could be substantial and costly.

Finally, in addition to the time, effort, and cost spent setting up the analysis, it is unclear if the analysis would provide any benefit, given the analysis would only show that LGP projects could be curtailed to mitigate a safety or reliability event. It does not provide any quantitative evidence on the risk of the event happening.

### **CONCLUSION**

For the reasons set forth above, the Utilities encourage the Commission to approve, without modification, their Advice Letters outlining whether and how the Utilities may curtail LGP Projects based on future grid conditions to ensure grid safety and reliability. The Utilities’ proposal is consistent with the decision and avoids shifting the cost risk of future upgrades to ratepayers.

### **TIER DESIGNATION**

Pursuant to OP 3 of Resolution E-5211, Advice 4941-E is submitted with a Tier 3 designation.

### **EFFECTIVE DATE**

Advice 4941-E will become effective upon Commission approval.

### **PROTESTS**

SCE asks that the Commission, pursuant to GO 96-B, General Rules 7.5.1, maintain the original protest and comment period designated in Advice 4941-E and not reopen the protest period. The additional information included in this supplemental advice letter does not change the substance of Advice 4941-E.

### **NOTICE**

In accordance with General Rule 4 of General Order (GO) 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B, R.19-09-009, and R.17-07-007 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to [AdviceTariffManager@sce.com](mailto:AdviceTariffManager@sce.com) or at (626) 302-4747. For changes to all other service lists, please contact the Commission’s Process Office at (415) 703-2021 or by electronic mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact David Schiada at (909) 274-3627 or by electronic mail at [David.Schiada@sce.com](mailto:David.Schiada@sce.com).

**Southern California Edison Company**

/s/ Connor Flanigan  
Connor Flanigan

CF:ds:bvs



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

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

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Darrah Morgan  
 Phone #: (626) 302-2086  
 E-mail: AdviceTariffManager@sce.com  
 E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE  
 ELC = Electric      GAS = Gas      WATER = Water  
 PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4941-E-A

Tier Designation: 3

Subject of AL: Supplement to Joint Advice 4941-E, Advice Letter Complying with Resolution E 5211 and Decision 20-09-035 Ordering Paragraph 16

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision 20-09-035 and Resolution E-5211

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

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes  No

Requested effective date:

No. of tariff sheets: -0-

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets: None

<sup>1</sup>Discuss 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](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Connor Flanigan  
Title: Managing Director, State Regulatory Operations  
Utility/Entity Name: Southern California Edison Company  
  
Telephone (xxx) xxx-xxxx:  
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Email: AdviceTariffManager@sce.com

Contact Name: Tara S. Kaushik c/o Karyn Gansecki  
Title: Managing Director, Regulatory Relations  
Utility/Entity Name: Southern California Edison Company  
  
Telephone (xxx) xxx-xxxx:  
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Email: karyn.gansecki@sce.com

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

Clear Form

## ENERGY Advice Letter Keywords

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

**PG&E Gas and Electric  
Advice Submittal List  
General Order 96-B, Section IV**

AT&T Albion Power Company	East Bay Community Energy Ellison Schneider & Harris LLP Engineers and Scientists of California	Pioneer Community Energy
Alta Power Group, LLC Anderson & Poole	GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute Hanna & Morton ICF	Public Advocates Office Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc.
Atlas ReFuel BART	iCommLaw International Power Technology Intertie	Resource Innovations SCD Energy Solutions San Diego Gas & Electric Company
Barkovich & Yap, Inc. Braun Blaising Smith Wynne, P.C. California Cotton Ginners & Growers Assn California Energy Commission	Intestate Gas Services, Inc.	SPURR San Francisco Water Power and Sewer Sempra Utilities
California Hub for Energy Efficiency Financing	Johnston, Kevin Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	Sierra Telephone Company, Inc. Southern California Edison Company Southern California Gas Company Spark Energy Sun Light & Power Sunshine Design Stoel Rives LLP
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McClintock IP McKenzie & Associates	Tecogen, Inc. TerraVerde Renewable Partners Tiger Natural Gas, Inc.
Cameron-Daniel, P.C. Casner, Steve Center for Biological Diversity	Modesto Irrigation District NLine Energy, Inc. NRG Solar	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
Chevron Pipeline and Power City of Palo Alto	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	
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 Dish Wireless L.L.C.		