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March 8, 2017

Advice 3821-G/5032-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Request for Authority to Continue the Retail Products Platform Pilot within PG&E's Residential Energy Efficiency Plug-Load and Appliances Sub-Program

Purpose

Pacific Gas and Electric Company (PG&E) requests authorization to continue the Retail Products Platform (RPP) pilot in 2017 within the Statewide Residential Energy Efficiency program's Plug-Load and Appliances (PLA) sub-program. This request includes a proposed budget of \$4.25 million to scale the pilot by adding two measures (clothes washers and refrigerators) and two retailers (Lowe's and Nationwide) in 2017.

Background

The RPP pilot is a strategic market transformation effort designed to create long-lasting, sustainable changes in the functioning of product-specific markets by reducing market barriers to the adoption of energy efficiency plug-load and appliances. For more background information on the RPP pilot, including the proposed budget, see Attachment A: Pilot Project Criteria.

Following PG&E's request to launch the RPP pilot through Advice Letter (AL) 3668-G/4765-E, PG&E received protests from The Utility Reform Network (TURN) and the California Public Utilities Commission's (Commission) Office of Ratepayer Advocates (ORA). Both protests were subsequently withdrawn following conversations with PG&E to address the parties' comments.

PG&E also submitted a RPP workpaper to the California Public Utilities Commission (CPUC or Commission) on December 15, 2015. The Commission's disposition on the workpaper rejected PG&E's inclusion of freezers and sound bars in the pilot because they had zero incremental measure costs (IMCs) and required additional research to justify their inclusion in the pilot.

PG&E filed a supplemental AL on February 10, 2016 to outline research that would be conducted in 2016 to support revisions to the RPP workpaper. The Commission approved PG&E's request to launch the RPP pilot on February 12, 2016.¹

In its disposition, the Commission clarified PG&E is required to submit an annual Tier 1 AL to receive budgetary approval to continue the RPP pilot:

“Additionally, PG&E stated that it ‘did not object’ to a requirement of filing a Tier 1 Advice Letter prior to each of the second, third and fourth years of the pilot in order to receive budgetary approval for the following year. It is clear that ORA’s desire was not limited to PG&E noting that it did not object to such a filing, **but more broadly asked PG&E actually file these advice letters as a matter of course as a means of safeguarding ratepayer funds based on accurate estimates of pilot performance to date.** To that end, Commission staff will work with PG&E to track pilot performance and share ongoing results with a broad set of stakeholders in order to enable adequate pilot review and sound advice letter filings.”²

Accordingly, PG&E is submitting this advice letter to request continued budgetary approval for the second year of the RPP pilot by providing an update on the pilot’s performance to date and an overview of anticipated activities in 2017.

PG&E’s Request

Overview of RPP Progress

After PG&E launched the RPP pilot in March 2016, PG&E continued to actively engage with the national ENERGY STAR Retail Products Platform (ESRPP), including Environmental Protection Agency (EPA) staff, energy efficiency program administrators (PAs), and participating retailers. PG&E helped shape the direction of the national ESRPP through the following activities:

- Worked with EPA staff and consultants to recruit additional PAs and retailers, thereby increasing ESRPP scale
- Facilitated refinements to the retailer data collection process and data system used by all PAs to ensure data quality
- Developed an early evaluation plan and provided direction to national evaluation efforts
- Advocated for accelerated RPP product specification with ENERGY STAR

¹ For more information, see Advice Letter 3668-G/4765-E and Supplemental Advice Letter 3668-G-A/4765-E-A.

² “Disposition to PG&E 3668-G/4765-E and Supplemental PG&E 3668-G-A/4765-E-A,” p. 3. Emphasis added.

Soon after launch, participating retailers fulfilled their early obligations to provide marketing implementation plans, historical category data, and authorizations for PAs to post in-store point-of-purchase signage on RPP products. As retailers began to submit their qualified sales data, PG&E worked with the ESRPP data aggregator to correct anomalies and build a robust system for tracking the data. Throughout the year, the ESRPP PAs met regularly to discuss progress and needed refinements, and together identified a common set of specifications for products that will be incentivized starting April 1, 2017. Also in 2016, PG&E worked with the Northwest Energy Efficiency Alliance (NEEA) and other PAs to discuss strategies for the coming years, including a strategy to accelerate ENERGY STAR version development for RPP product categories.

Actions Taken in Response to Feedback

In the last year, PG&E has also taken actions to incorporate feedback received from the Commission and stakeholders. These updates are itemized and addressed in further detail below:

A. Track pilot performance and share ongoing results with the Commission³

PG&E continues to share ongoing RPP pilot results and programmatic developments with Commission staff to provide the Commission with visibility into the pilot's performance to date as well as an opportunity to comment on program processes and activities. To this end, PG&E has conducted quarterly RPP review meetings with Commission staff to share early progress and address questions regarding program operation and direction.

B. Ensure participating retailers provide marketing implementation plans soon after RPP pilot launch⁴

PG&E ensured contractual provisions related to the timeliness of marketing implementation plans were part of the retailer agreements used by all ESRPP program sponsors. The retailer agreements specified that participating retailers must provide the marketing implementation plans to utilities within the first 30 days of pilot implementation and begin activities related to the plans within 90 days of pilot implementation.

Each of the participating retailers provided the marketing implementation plans within 30 days of program start. The initial marketing implementation plans provided high-level descriptions of RPP product marketing implementation plans. PG&E coordinated with retailers to develop a sales and incentive forecast, as well as a joint messaging and sales associate support strategy within the first 90 days of launch. Since launch, PG&E

³ "Disposition to PG&E 3668-G/4765-E and Supplemental PG&E 3668-G-A/4765-E-A," p. 2.

⁴ "TURN Limited Protest of PG&E Advice Letter 3668-G/4765-E," January 13, 2016, p. 2-4.

has deployed its Field Services Team to conduct RPP product shelf surveys and monitor promotions and product placement within RPP retailers on a monthly basis.

C. Encourage other California IOUs to participate in the RPP pilot⁵

The RPP pilot program theory states PG&E will encourage other IOUs to participate in the RPP if pilot activities are successful. To this point, TURN's protest to AL 3668-G/4765-E identifies "A statewide effort in California is critical to this market transformation effort."⁶ As a result, TURN recommended the Commission direct the other IOUs to file ALs "...clarifying their plans to participate in the ENERGY STAR RPP and coordinate their efforts with PG&E."⁷ Although the Commission determined other IOUs are not required to participate until the pilot's market transformation theory is put to the test, PG&E has continued to coordinate its efforts with the other IOUs since launch.

Specifically, PG&E has shared ongoing RPP results and programmatic developments with the other IOU PLA leads and Commission staff on a monthly basis. PG&E has and will continue to provide these updates and relevant supporting documentation to the IOUs, and will readily support IOU preparation to join RPP.

D. Develop a performance metrics framework that tracks sales of high efficiency units⁸

As a condition of program participation, retailers provide monthly sales data for both qualifying and non-qualifying models in each RPP product category to PG&E's third party data aggregator. The data aggregator uses this information to provide PG&E with monthly market penetration and qualifying product sales activity reports. PG&E uses this information to monitor progress towards market saturation, identify which products require adjustments to the qualification thresholds, and compare program progress against sales forecasts and goals.

However, market transformation is a long-term process, and other non-sales indicators are needed for the early years of the pilot to reveal the participants' commitments to support this effort. As a result, PG&E identified a set of key market transformation indicators prior to launch that would be appropriate metrics for the early years of the RPP pilot. Table 1, "Key Indicators of RPP Market Transformation – Year 1 Progress," summarizes PG&E's progress on these indicators.⁹

⁵ "Disposition to PG&E 3668-G/4765-E and Supplemental PG&E 3668-G-A/4765-E-A," p. 2.

⁶ "TURN Limited Protest of PG&E Advice Letter 3668-G/4765-E," January 13, 2016, p. 5.

⁷ "TURN Limited Protest of PG&E Advice Letter 3668-G/4765-E," January 13, 2016, p. 5.

⁸ "ORA Protest of PG&E Advice Letter 3668-G/4765-E," January 13, 2016, p. 1-2.

⁹ Please note this table does not include indicators I1, M1, N1, and V (as stated in Appendix F of AL 3668-G/4765-E) due to data quality and confidentiality. This information has been reported to the Commission during quarterly RPP meetings.

Table 1: Key Indicators of RPP Market Transformation – Year 1 Progress

Logic Model Component / Agreement	Concept	Calculation	Q4 2016 Target	Q4 2016 Actuals	Met Target?
C2: Program Administrator Sponsors recruited	Reach of recruited PAs	Percent of U.S. population of utility customers served by all PAs in national RPP effort	18%	18%	Yes
F3: Signed contracts between PAs and retailers.	Market share of all in-store units sold (in US and by PA) for participating retailers, by retailer, by product category	Initial: Count of major retailers or major retail buying groups (serving smaller retailers, such as Nationwide which is a major buying group)	3	3	Yes
E2: Participating PAs and identified retailers target product categories with energy savings potential and propose incentive levels.	Number of targeted product categories	<u>Cumulative</u> number of targeted product categories	6	6	Yes
Output G: PAs approve retailers' marketing plans including sales forecasts of program-qualified models within each product category.	Clearly defined and measurable sales goals for targeted product categories	Count of retailer implementation plans that have clearly defined and measurable sales goals for targeted product categories	3	3	Yes, with PG&E assistance*
Output H: Retailers implement plans employing various strategies and update as necessary	Participating retailers faithfully executing implementation plans	Count of participating retailers confirmed to be faithfully executing their implementation plans	3	3	Yes, with PG&E assistance*

* The initial marketing implementation plans provided high-level descriptions of RPP product marketing implementation targets and schedule. PG&E coordinated with retailers to develop a sales and incentive forecast and a joint messaging and sales associate support strategy within 90 days of launch.

E. Conduct additional research in support of RPP measure workpapers and submit workpaper update¹⁰

PG&E's supplemental AL 3668-G-A/4765-E-A outlined the following research activities in support of an updated RPP workpaper:

- Product-specific market barrier research on all six RPP product categories.
- Research to demonstrate ENERGY STAR-certified products (specifically soundbars, air cleaners, and freezers) are more efficient than non-ENERGY STAR-certified products.
- Research on baseline conditions in support of the standard practice baseline for electric and gas dryers
- Research to support estimations of unit-energy-savings (UES) values for sound bars, including typical baseline assumptions for model power draw, operating hours, and usage profile.

The results of these research activities were submitted to the CPUC on December 30, 2016 and discussed via a webinar with Commission staff and consultants on February 2, 2017. During that conversation, PG&E described the market barriers addressed by RPP for each of the RPP product categories, and how the research supports UES adjustments for RPP measures. PG&E responded to all questions raised during the webinar and there were no outstanding questions regarding the workpaper update. The updated UES values were incorporated into the RPP workpaper update submitted to the Commission on February 20, 2017.

New Measures: Clothes Washers and Refrigerators

PG&E proposes to add clothes washers and refrigerators to the RPP pilot on April 1, 2017. PG&E included these measures in the workpaper update along with updates to existing RPP measures. For any RPP measures not approved for *ex ante* savings by April 1, 2017, PG&E requests authority to include these measures as part of the pilot, and claim savings subject to an *ex post* evaluation, or *ex ante* starting at the point those additional measures are approved. PG&E requests all RPP measures be added to the deemed "Uncertain Measure List," so that all *ex ante* values will be verified on an annual basis.

The proposed update to the RPP product categories, tiers, and incentives is identified below in Table 2, "Product Categories, Tiers, and Incentives." These products and specifications were established via collaboration with the EPA and other PAs across the

¹⁰ "Disposition to PG&E 3668-G/4765-E and Supplemental PG&E 3668-G-A/4765-E-A," p. 3-4.

country. Notably, the collaboration identified stricter specifications for air cleaners due to market saturation exceeding the program threshold in 2016, as well as for room air conditioners and clothes dryers since there were new ENERGY STAR Most Efficient specifications suitable for the advanced tier. PG&E plans to offer the incentive levels shown in Table 2 starting April 1, 2017.

Table 2: Product Categories, Tiers and Incentives

Product Category	RPP Tier	RRP Standard or Specification*	2016 PG&E Unit Incentive	2017 PG&E Unit Incentive
Sound bars	Basic	ENERGY STAR v3 +15%	\$10	\$0
	Advanced	ENERGY STAR v3 +50%	\$20	\$20
Air cleaners	Basic	ENERGY STAR v1.2 +30%	\$30	\$20
	Advanced	ENERGY STAR v1.2 +50%	N/A	\$30
Freezers	Basic	ENERGY STAR v5	\$20	\$20
	Advanced	ENERGY STAR v5 +5%	\$50	\$50
Room air conditioners	Basic	ENERGY STAR v4	\$20	\$20
	Advanced	ENERGY STAR v4 + connectivity	N/A	\$20
Electric clothes dryers	Basic	ENERGY STAR v1	\$50	\$30
	Advanced	ENERGY STAR Most Efficient 2017	N/A	\$250
Gas clothes dryers	Basic	ENERGY STAR v1	\$50	\$30
	Advanced	ENERGY STAR Most Efficient 2017	N/A	\$250
Clothes washers (New)	Basic	ENERGY STAR Most Efficient 2017	N/A	\$0
	Advanced	ENERGY STAR Most Efficient 2017 +5%	N/A	\$20
Refrigerators (New)	Basic	ENERGY STAR v5	N/A	\$0
	Advanced	ENERGY STAR Most Efficient 2017	N/A	\$20

*ENERGY STAR levels are the versions effective as of January 1, 2017

New Retailers: Lowe's and Nationwide

PG&E also collaborated with the EPA and other PAs across the country in 2016 to identify two additional retailers that could join RPP: Nationwide—a buying group representing small and mid-size retailers across the country—and Lowe's. These companies were selected based on the market share they represent for current and new RPP product categories. In particular, the proposed inclusion of Nationwide aims to more holistically meet the needs of the market by enrolling smaller retailers, expanding the reach of the RPP pilot's current participation from predominantly larger retailers. Lowe's and Nationwide will officially join the national RPP effort on April 1, 2017, and PG&E proposes to align its efforts by including them in the RPP pilot on this date.

PG&E notes Nationwide is unable to provide sales data for its products and equipment. PG&E proposes to use shipping data as a proxy and is working with the Commission staff and evaluation consultants to ensure the retailer's reporting capability aligns with PG&E's performance metrics framework.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than March 28, 2017, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-1448
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, telephone number, postal address, and (where appropriate) 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).

Effective Date

PG&E requests that this Tier 1 advice filing become effective upon filing on March 8, 2017.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.13-11-005. 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 filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

_____/S/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List R.13-11-005

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING 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 M)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: AMHP@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE

(Date Filed/ Received Stamp by CPUC)

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

Advice Letter (AL) #: **3821-G/5032-E**

Tier: 1

Subject of AL: **Request for Authority to Continue the Retail Products Platform Pilot within PG&E's Residential Energy Efficiency Plug-Load and Appliances Sub-Program**

Keywords (choose from CPUC listing): Compliance, Agreements, Energy Efficiency, Contracts

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: N/A

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: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: No

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: _____

Resolution Required? Yes No

Requested effective date: **March 8, 2017**

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 proposed: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

California Public Utilities Commission

Energy Division

EDTariffUnit

505 Van Ness Ave., 4th Flr.

San Francisco, CA 94102

E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Erik Jacobson

Director, Regulatory Relations

c/o Megan Lawson

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

Attachment A: Pilot Project Criteria

In Section 4.3.1 of D.09-09-047, the CPUC established ten requirements for a pilot proposal. These requirements are addressed below.

1. A specific statement of the concern, gap, or problem that the pilot seeks to address and the likelihood that the issue can be addressed cost-effectively through utility programs

The RPP pilot helps meet the goal stated in the California Long-term Energy Efficiency Strategic Plan to “develop comprehensive, innovative initiatives to reverse the growth of plug load energy consumption.” The RPP pilot is a market transformation program with a cumulative TRC over the initial four-year pilot estimated by the E3 Calculator at a value of 0.57. However, over the ten-year life of the program, the cumulative TRC is estimated to be 1.75.¹ More information on the gap addressed by the RPP pilot is in section “3.1: Program Rationale” in the Program Theory and Logic Model, Appendix A.

2. Whether and how the pilot will address a Strategic Plan goal or strategy and market transformation

As discussed in detail in Appendix A, the RPP Program Theory and Logic Model of Advice Letter 3668-G/4765-E (December 24, 2015), the RPP pilot uses a market transformation program design to address Strategic Plan Residential Sector Goal 3 – Develop comprehensive, innovative initiatives to reverse the growth of plug load energy consumption through technological and behavioral solutions.

3. Specific goals, objectives and end points for the project

Advice Letter 3668-G/4765-E (December 24, 2015), Appendix F, RPP Pilot Metrics and Targets, provides the complete details of the specific goals and objectives of the proposed RPP pilot project. Key leading indicator metrics and related targets are provided, and can be modified as the pilot progresses, in concert with the CPUC Staff.

The key leading indicators and targets will be used quarterly to monitor and review pilot progress and inform plans for any adjustments or other necessary actions in a timely manner during the pilot period.

4. New and innovative design, partnerships, concepts or measure mixes that have not yet been tested or employed

The RPP is an innovative collaboration between program administrators and retailers to create long term market transformation in the residential plug load and appliance market. The pilot leverages national coordination to reach scale to move end-user purchases of products in targeted plug load and appliance categories toward more efficient models. Unlike typical measures in PG&E’s energy efficiency measure portfolio that are characterized as resource acquisition (RA) programs, the RPP pilot is characterized as a market transformation (MT) program. PG&E designed this pilot to conform to the guidance provided by two key whitepapers commissioned by the CPUC.² The objective of the RPP pilot is to accomplish long-term sustainable changes in the business practices of key market actors that will result in consumers adopting more efficient plug load and appliance products and to influence the supply chain to provide more efficient models over time.

5. A clear budget and timeframe to complete the project and obtain results within a portfolio cycle - pilot projects should not be continuations of programs from previous portfolios

PG&E proposes to use funding for this pilot in the existing Residential EE Program budget. PG&E will monitor RPP progress through quarterly reviews with CPUC staff. Updates to key product-level parameters will be made on a yearly basis as recommended by Cal TF. Updates may result from the

¹ The TRC is less than one in the initial pilot period due to the use of the short-term net-to-gross ratios (NTGRs). Over the life of the 10-year RPP Program, both the NTGRs and market effects are expected to increase leading to a TRC that reaches 1.72.

² Keating, Ken (2014): Guidance on Designing and Implementing Energy Efficiency Market Transformation Initiatives. Prah, Ralph and Keating, Ken (2014): Guidance on Designing and Implementing Energy Efficiency Market Transformation Initiatives.

Rolling Portfolio Business Plan process. The incentive levels and products may be modified during the pilot period based on the market response to the pilot.

The RPP pilot forecast, shown in Table 3, assumes that, after the first year of intervention with four retailer participants, three to four additional retailers will be added to increase the scale of the effort and enable market transformational effects. For the 2017 ESRPP, two retailers and two product categories will be added. PG&E has the option to end the pilot during the four year period. Decreases or increases to this forecast may result from the addition and/or sunseting of product categories into and out of RPP, in accordance with the RPP Product Introduction and Transition process found in Appendix C.

Table 3: RPP Funding Forecast

Year	Incentives	Direct Implementation, Administration, and Marketing	Total
2016	\$1,250,000	\$900,000	\$2,150,000
2017	\$3,150,000	\$1,100,000	\$4,250,000
2018	\$3,662,500	\$1,250,000	\$4,912,500
2019	\$4,165,875	\$1,400,000	\$5,565,875
4-Year Total			\$16,878,375

6. Information on relevant baselines metrics or a plan to develop baseline information against which the project outcomes can be measured

Please see Advice Letter 3668-G/4765-E (December 24, 2015), Appendix H, the Draft RPP Pilot Evaluation Plan, for the details of the plan to develop baseline information against which the project outcomes can be measured.

7. Program performance metrics

Please see Advice Letter 3668-G/4765-E (December 24, 2015), Appendix G, RPP Pilot Metrics and Targets, for the details of the proposed RPP pilot project key leading indicators and targets for those indicators. These indicators and targets will be finalized and revised as needed through input and discussion with CPUC Staff.

8. Methodologies to test the cost-effectiveness of the project

Please see Advice Letter 3668-G/4765-E (December 24, 2015), Appendix G, the Draft RPP Pilot Evaluation Plan, for the details of the methodology to test the cost-effectiveness of the pilot.

9. A proposed EM&V plan

Please see Advice Letter 3668-G/4765-E (December 24, 2015), Appendix G, the RPP Pilot Evaluation Plan, which was submitted to Energy Division on December 16, 2015 after a period of public review.

10. A concrete strategy to identify and disseminate best practices and lessons learned from the pilot to all California utilities and to transfer those practices to resource programs, as well as a schedule and plan to expand the pilot to utility and hopefully statewide usage.

PG&E will hold quarterly RPP pilot check-in meetings with CPUC staff, consultants and the other California utilities. PG&E proposes that the RPP pilot evaluation completed six months before the end of the proposed four-year period. This would ensure that if the CPUC approves a long-term RPP subprogram, the implementation of the RPP model, with any needed revisions, will continue without interruption.

PG&E Gas and Electric Advice Filing List

AT&T	Don Pickett & Associates, Inc.	OnGrid Solar
Albion Power Company	Douglass & Liddell	Pacific Gas and Electric Company
Alcantar & Kahl LLP	Downey & Brand	Praxair
Anderson & Poole	Ellison Schneider & Harris LLP	Regulatory & Cogeneration Service, Inc.
Atlas ReFuel	Evaluation + Strategy for Social Innovation	SCD Energy Solutions
BART	G. A. Krause & Assoc.	SCE
Barkovich & Yap, Inc.	GenOn Energy Inc.	SDG&E and SoCalGas
Bartle Wells Associates	GenOn Energy, Inc.	SPURR
Braun Blaising McLaughlin & Smith, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Water Power and Sewer
Braun Blaising McLaughlin, P.C.	Green Charge Networks	Seattle City Light
CENERGY POWER	Green Power Institute	Sempra Energy (Socal Gas)
CPUC	Hanna & Morton	Sempra Utilities
California Cotton Ginners & Growers Assn	ICF	SoCalGas
California Energy Commission	International Power Technology	Southern California Edison Company
California Public Utilities Commission	Intestate Gas Services, Inc.	Southern California Gas Company (SoCalGas)
California State Association of Counties	Kelly Group	Spark Energy
Calpine	Ken Bohn Consulting	Sun Light & Power
Casner, Steve	Leviton Manufacturing Co., Inc.	Sunshine Design
Center for Biological Diversity	Linde	Tecogen, Inc.
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	TerraVerde Renewable Partners
City of San Jose	Los Angeles Dept of Water & Power	TerraVerde Renewable Partners, LLC
Clean Power	MRW & Associates	Tiger Natural Gas, Inc.
Clean Power Research	Manatt Phelps Phillips	TransCanada
Coast Economic Consulting	Marin Energy Authority	Troutman Sanders LLP
Commercial Energy	McKenna Long & Aldridge LLP	Utility Cost Management
Cool Earth Solar, Inc.	McKenzie & Associates	Utility Power Solutions
County of Tehama - Department of Public Works	Modesto Irrigation District	Utility Specialists
Crossborder Energy	Morgan Stanley	Verizon
Crown Road Energy, LLC	NLine Energy, Inc.	Water and Energy Consulting
Davis Wright Tremaine LLP	NRG Solar	Wellhead Electric Company
Day Carter Murphy	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Defense Energy Support Center	ORA	YEP Energy
Dept of General Services	Office of Ratepayer Advocates	Yelp Energy
Division of Ratepayer Advocates	Office of Ratepayer Advocates, Electricity Planning and Policy B	