

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 12, 2019

Advice Letter 4160-G and 5657-E

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**SUBJECT: Establishment of California Consumer Privacy Act Memorandum Account
(CCPAMA) in Compliance with Decision 19-09-026.**

Dear Mr. Jacobson:

Advice Letter 4160-G and 5657-E are effective as of October 11, 2019.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Edward Randolph'.

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

PUBLIC UTILITIES COMMISSION

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SAN FRANCISCO, CA 94102-3298



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Erik Jacobson
Director, Regulatory Relations
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77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**SUBJECT: Establishment of California Consumer Privacy Act Memorandum Account
(CCPAMA) in Compliance with Decision 19-09-026.**

Dear Mr. Jacobson:

Advice Letter 4160-G and 5657-E are effective as of October 11, 2019.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

October 11, 2019

Advice 4160-G/5657-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Establishment of California Consumer Privacy Act Memorandum Account (CCPAMA) in Compliance with Decision 19-09-026

Purpose

The purpose of this Tier 1 advice letter is to establish Pacific Gas & Electric's (PG&E) California Consumer Privacy Act Memorandum Account in compliance with Ordering Paragraph (OP) 1 of the California Public Utilities Commission (CPUC or Commission) Decision (D) 19-09-026.

Background

On September 12, 2019 the CPUC adopted D.19-09-026 which authorized PG&E to submit a Tier 1 advice letter to establish a memorandum account to track and record incremental costs to implement the California Consumer Privacy Act of 2018. Per OP1 the effective date of PG&E's memorandum account is March 27, 2019.

PG&E expects to incur both incremental operational expenses and capital expenditures to fulfill the California Consumer Privacy Act of 2018. Costs that can be attributed specifically to electric service will be recorded to the electric account and costs that can be attributed specifically to gas service will be recorded to the gas account. General costs that cannot be attributed specifically either to providing electric service or gas service will be allocated 55% electric and 45% gas, which is representative of PG&E's electric and gas customers historically.

The disposition of the balances in these accounts will be addressed in PG&E's next general rate case proceeding, or other application or proceeding. Upon review and approval by the CPUC, PG&E will transfer the California Consumer Privacy Act Memorandum Account balances to the appropriate electric and gas balancing accounts, as may be directed by the Commission, for recovery in rates.

Tariff Revisions

Add Electric Preliminary Statement Part IA, California Consumer Privacy Act Memorandum Account – Electric (CCPAMA-E), to record incremental costs to implement the California Consumer Privacy Act of 2018.

Add Gas Preliminary Statement Part FD, California Consumer Privacy Act Memorandum Account - Gas (CCPAMA-G), to record incremental costs to implement the California Consumer Privacy Act of 2018.

Rates

CPUC approval of this submittal would not increase any current rate or change, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than October 31, 2019, which is 20 days after the date of this submittal. 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.govCa

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 B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
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 submittal become effective March 27, 2019 in accordance with OP 1 of D.19-09-026.

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 A.19-03-020. 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/

Erik Jacobson
Director, Regulatory Relations

Attachments

cc: Service List of A.19-03-020



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 U39M)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Yvonne Yang

Phone #: (415)973-2094

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: Yvonne.Yang@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) #: 4160-G/5657-E

Tier Designation: 1

Subject of AL: Establishment of California Consumer Privacy Act Memorandum Account (CCPAMA) in Compliance with Decision 19-09-026

Keywords (choose from CPUC listing): Compliance

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-09-026

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: 3/27/19

No. of tariff sheets: 6

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: N/A

¹Discuss in AL if more space is needed.

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

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Clear Form

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
35320-G	GAS PRELIMINARY STATEMENT PART FD CALIFORNIA CONSUMER PRIVACY ACT MEMORANDUM ACCOUNT - GAS Sheet 1	
35321-G	GAS TABLE OF CONTENTS Sheet 1	35318-G
35322-G	GAS TABLE OF CONTENTS Sheet 6	35245-G



GAS PRELIMINARY STATEMENT PART FD
CALIFORNIA CONSUMER PRIVACY ACT MEMORANDUM ACCOUNT - GAS

Sheet 1

(N)
(N)

FD. California Consumer Privacy Act Memorandum Account – Gas (CCPAMA-G)

(N)

1. **PURPOSE:** The purpose of the California Consumer Privacy Act Memorandum Account is to record incremental gas capital costs and expenses related to implementing the requirements of the California Consumer Privacy Act of 2018. Costs that can be attributed specifically to gas service will be recorded to this account. General costs that cannot be attributed specifically either to providing electric service or gas service will be allocated 55% electric and 45% gas.
2. **APPLICABILITY:** The California Consumer Privacy Act Memorandum Account applies to all gas customer classes, except for those schedules or contracts specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balances in this account will be addressed in PG&E's next General Rate Case, or other application or separate proceeding, or as otherwise authorized by the Commission.
4. **RATES:** The California Consumer Privacy Act Memorandum Account does not have a rate component.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the California Consumer Privacy Act Memorandum Account by making the following entries to the account at the end of each month, as applicable:
 - a. A debit entry equal to the incremental expenses related to implementation of the California Consumer Privacy Act;
 - b. A debit or credit entry equal to the incremental capital revenue requirement based on incurred capital costs, including without limitation IT system and software capital revenue requirements, excluding Revenue Fees and Uncollectibles (RF&U). Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
 - c. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission, and
 - d. An entry, as appropriate, each month equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)



GAS TABLE OF CONTENTS

Sheet 1

TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page	35321-G	(T)
Rate Schedules	35319,35312-G	
Preliminary Statements.....	35313,35068-G	
Preliminary Statements, Rules	35322-G	(T)
Rules, Maps, Contracts and Deviations.....	35195-G	
Sample Forms	34229,32986,32987,32886,34953,32888-G	

(Continued)

Advice 4160-G
Decision D.19-09-026

Issued by
Robert S. Kenney
Vice President, Regulatory Affairs

Submitted
Effective
Resolution

October 11, 2019
March 27, 2019



GAS TABLE OF CONTENTS

Sheet 6

PART	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Preliminary Statements		
Part DO	Hydrostatic Pipeline Testing Memorandum Account	32805-G
Part DP	Transmission Integrity Management Program Memorandum Account.....	33476-G
Part DQ	Engineering Critical Assessment Balancing Account (ECABA)	32809-G
Part DR	Hydrostatic Station Testing Memorandum Account (HSTMA)	33084-G
Part DS	Work Required by Others Balancing Account (WROBA).....	33477-G
Part DT	Critical Document Program Memorandum Account (CDPMA)	32812-G
Part DU	Z-Factor Memorandum Account (ZFMA-G).....	33478,33479-G
Part DZ	New Environmental Regulations Balancing Account (NERBA)	34675,33812-G
Part EA	Natural Gas Leak Abatement Program Balancing Account (NGLAPBA).....	33695-G
Part EB	Natural Gas Leak Abatement Program Memorandum Account (NGLAPMA)	33600-G
Part EC	Emergency Consumer Protections Memorandum Account (WCPMA-G).....	34677,35128-G
Part EE	Wildfire Expense Memorandum Account (WEMA-G)	34367-G
Part EG	Dairy Biomethane Pilots Balancing Account (DBPBA)	34715-G
Part EH	Dairy Biomethane Pilots Memorandum Account (DBPMA)	34716-G
Part EC	Emergency Consumer Protections Memorandum Account - Gas (ECPMA-G)	34874*, 35019, 35020-G
Part FD	California Consumer Privacy Act Memorandum Account – Gas (CCPAMA-G)	35320-G (N)
RULE	TITLE OF SHEET	
Rules		
Rule 01	Definitions	31083,26782,33639,31560,31561,35243,34516,35021*, 35129,35130,34467,34468,34469,34470,34471,34472,34473,34474,34475-G
Rule 02	Description of Service	23062,23063,23064,23065,23066,33824-G
Rule 03	Application for Service	27248,27249-G
Rule 04	Contracts	17051-G
Rule 05	Special Information Required on Forms	30088,32872,32873-G
Rule 06	Establishment and Reestablishment of Credit	22126,30687,34524-G
Rule 07	Deposits.....	31330,28655-G
Rule 08	Notices.....	31924,17580,31925,30689,31926-G
Rule 09	Rendering and Payment of Bills.....	31914,34525,31381,33305,33507, 27345,31167,34972-G
Rule 10	Disputed Bills	18214,18215, 18216-G
Rule 11	Discontinuance and Restoration of Service	34867,34868,34052,34053,33494,33878, 34516,34678,34465,34632,34467,34470,34471,34472,34473,34474,34475-G
Rule 12	Rates and Optional Rates	18229,27253,24132,21981,21982,34520-G
Rule 13	Temporary Service	22832-G
Rule 14	Capacity Allocation and Constraint of Natural Gas Service	18231,18232,18233,18234, 18235,30690,30691,30692,30693,30694,30695,30696,30697,30698, 28283,30699,30700,30701,30702,29787,28289,28290,30703,28292-G
Rule 15	Gas Main Extensions	21543,18802-18803,32408,20350,29271,31168,26827,21544, 21545,22376,22377,22378,22379,26828,26829,18814-G
Rule 16	Gas Service Extensions.....	21546,18816,34880,17161,18817,18818,18819,18820,18821, 18822,29273,18824,18825,17737,18826,18827-G
Rule 17	Meter Tests and Adjustment of Bills for Meter Error	14450,28656,28764,28770,28771, 28772,28773,28774-G
Rule 17.1	Adjustment of Bills for Billing Error.....	22936,28657,29274-G
Rule 17.2	Adjustment of Bills for Unauthorized Use	22937,14460,14461-G
Rule 18	Supply to Separate Premises and Submetering of Gas.....	22790,17796,13401-G
Rule 19	Medical Baseline Quantities.....	21119,31932,21121-G

(Continued)

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
45528-E	ELECTRIC PRELIMINARY STATEMENT PART IA CALIFORNIA CONSUMER PRIVACY ACT MEMORANDUM ACCOUNT - ELECTRIC (CCPAMA-E) Sheet 1	
45529-E	ELECTRIC TABLE OF CONTENTS Sheet 1	45399-E
45530-E	ELECTRIC TABLE OF CONTENTS Sheet 17	44714-E



ELECTRIC PRELIMINARY STATEMENT PART IA
CALIFORNIA CONSUMER PRIVACY ACT MEMORANDUM ACCOUNT - ELECTRIC (CCPAMA-E)

Sheet 1

(N)

(N)

IA. California Consumer Privacy Act Memorandum Account – Electric (CCPAMA-E)

(N)

1. **PURPOSE:** The purpose of the California Consumer Privacy Act Memorandum Account is to record incremental electric capital costs and expenses related to implementing the requirements of the California Consumer Privacy Act of 2018. Costs that can be attributed specifically to electric service will be recorded to this account. General costs that cannot be attributed specifically either to providing electric service or gas service will be allocated 55% electric and 45% gas.
2. **APPLICABILITY:** The California Consumer Privacy Act Memorandum Account applies to all electric customer classes, except for those schedules or contracts specifically excluded by the Commission.
3. **REVISION DATE:** Disposition of the balances in this account will be addressed in PG&E's next General Rate Case, or other application or separate proceeding, or as otherwise authorized by the Commission.
4. **RATES:** The California Consumer Privacy Act Memorandum Account does not have a rate component.
5. **ACCOUNTING PROCEDURE:** PG&E shall maintain the California Consumer Privacy Act Memorandum Account by making the following entries to the account at the end of each month, as applicable:
 - a. A debit entry equal to the incremental expenses related to implementation of the California Consumer Privacy Act;
 - b. A debit or credit entry equal to the incremental capital revenue requirement based on incurred capital costs, including without limitation IT system and software capital revenue requirements, excluding Revenue Fees and Uncollectibles (RF&U). Capital-related revenue requirements include depreciation expense, return on investment, federal and state income taxes, and property taxes associated with the costs of installed equipment;
 - c. A debit or credit entry, as appropriate, to record the transfer of amounts to or from other accounts as approved by the Commission, and
 - d. An entry, as appropriate, each month equal to interest on the average balance in the account at the beginning of the month and the balance after the above entries, at a rate equal to one-twelfth of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15 or its successor.

(N)



ELECTRIC TABLE OF CONTENTS

Sheet 1

TABLE OF CONTENTS

SCHEDULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page		45529-E	(T)
Rate Schedules.....	45400,45401,45402,45403,45404,45405,43935,44177-E		
Preliminary Statements.....	45406,44687,42856*,43670,41723,40591,44724, 45530-E		(T)
Rules	45270,43023,44786-E		
Maps, Contracts and Deviations	37960-E		
Sample Forms...40925*,37631,41151*,41573*, 37632,41152*,41153,37769,44035,40671,37169-E			

(Continued)

<i>Advice</i>	5657-E	<i>Issued by</i>	<i>Submitted</i>	<u>October 11, 2019</u>
<i>Decision</i>	D.19-09-026	Robert S. Kenney	<i>Effective</i>	<u>March 27, 2019</u>
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	<u></u>



ELECTRIC TABLE OF CONTENTS

Sheet 17

PART	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Preliminary Statements (Cont'd)		
Part GA	Greenhouse Gas Expense Memorandum Account.....	32419,32420-E
Part GB	Greenhouse Gas Revenue Balancing Account.....	35256,40560-E
Part GC	California Energy Systems for the 21 st Century Balancing Account.....	40561-E
Part GD	Smart Grid Pilot Deployment Project Balancing Account.....	32540,32541, 32542-E
Part GE	Statewide Marketing, Education and Outreach Expenditure Balancing Account.....	37728-E
Part GF	Customer Data Access Balancing Account – Electric.....	33136-E
Part GH	Mobile Home Park Balancing Account - Electric.....	41091,41092-E
Part GI	Energy Data Center Memorandum Account – Electric.....	33940-E
Part GJ	Major Emergency Balancing Account (MEBA).....	40563-E
Part GK	SmartMeter™ Opt-Out Program Balancing Account - Electric (SOPBA-E).....	35625,35626,35627-E
Part GL	Hydro Licensing Balancing Account (HLBA).....	40564-E
Part GM	Nuclear Regulatory Commission Rulemaking Balancing Account (NRCRBA).....	40565-E
Part GN	San Francisco Incandescent Streetlight Replacement Account.....	34364-E
Part GO	Disconnection Memorandum Account - Electric (DMA-E).....	34604-E
Part GP	Green Tariff Shared Renewables Memorandum Account (GTSRMA).....	40566,40567, 40567-E
Part GQ	Energy Efficiency Financing Balancing Account – Electric (EEFMA-E).....	35292,35293,35294-E
Part GR	Green Tariff Shared Renewables Balancing Account (GTSRBA).....	40569,40570,35377-E
Part GS	Residential Rate Reform Memorandum Account (RRRMA).....	40571,40572-E
Part GT	Assembly Bill 802 Memorandum Account - Electric.....	40573-E
Part GU	Z-Factor Memorandum Account (ZFMA-E).....	40574-E
Part GV	Distribution Interconnection Memorandum Account (DIMA).....	40575-E
Part GY	Electric Vehicle Program Balancing Account (EVPBA).....	40576-E
Part GZ	Distributed Energy Resources Distribution Deferral Account.....	43656,43657,43658-E
Part HA	Avoided Cost Calculator Memorandum Account.....	40000-E
Part HB	Distribution Resources Plan Demonstration Balancing Account.....	40577-E
Part HC	Rule 20A Balancing Account.....	41736-E
Part HD	Tax Memorandum Account (TMA-E).....	41088-E
Part HE	Executive Compensation Memorandum Account (ECMA-E).....	40699,40700-E
Part HF	Distribution Resources Plan Tools Memorandum Account (DRPTMA).....	42139,42140-E
Part HG	Emergency Consumer Protections Memorandum Account - Electric (WCPMA-E).....	43007,44214, 44215-E
Part HH	Transportation Electrification Balancing Account (TEBA).....	44688,44689,44690,44691, 42579,42580,42581,44692-E
Part HI	Solar On Multifamily Affordable Housing Balancing Account (SOMAHBA).....	41781-E
Part HK	Diablo Canyon Retirement Balancing Account.....	42161, 43668-E
Part HL	Wildfire Expense Memorandum Account (WEMA-E).....	42604, 42605-E
Part HM	Public Policy Charge Balancing Account (PPCBA).....	44051,44037,44052-E
Part HQ	Fire Risk Mitigation Memorandum Account (FRMMA).....	43314-E
Part HR	Net Energy Metering (NEM) Balancing Account (NEMBA).....	43317-E
Part HT	Officer Compensation Memorandum Account (OCMA-E).....	43629,43630-E
Part HU	San Joaquin Valley Disadvantaged Communities Pilot Balancing Account.....	44053-E
Part HX	Wildfire Plan Memorandum Account (WPMA).....	44450-E
Part HY	Rule 21 Interconnection Balancing Account (R21 BA).....	44711,44712-E
Part IA	California Consumer Privacy Act Memorandum Account – Electric (CCPAMA-E).....	45528-E (N)

(Continued)

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	
	Energy Management Service	Redwood Coast Energy Authority
Alta Power Group, LLC	Engineers and Scientists of California	Regulatory & Cogeneration Service, Inc.
Anderson & Poole	Evaluation + Strategy for Social	SCD Energy Solutions
	Innovation	
Atlas ReFuel	GenOn Energy, Inc.	SCE
BART	Goodin, MacBride, Squeri, Schlotz &	SDG&E and SoCalGas
	Ritchie	
Barkovich & Yap, Inc.	Green Charge Networks	SPURR
P.C. CalCom Solar	Green Power Institute	San Francisco Water Power and Sewer
California Cotton Ginners & Growers Assn	Hanna & Morton	Seattle City Light
California Energy Commission	ICF	Sempra Utilities
California Public Utilities Commission	International Power Technology	Southern California Edison Company
California State Association of Counties	Intestate Gas Services, Inc.	Southern California Gas Company
Calpine	Kelly Group	Spark Energy
	Ken Bohn Consulting	Sun Light & Power
Cameron-Daniel, P.C.	Keyes & Fox LLP	Sunshine Design
Casner, Steve	Leviton Manufacturing Co., Inc. Linde	Tecogen, Inc.
Cenergy Power	Los Angeles County Integrated Waste	TerraVerde Renewable Partners
Center for Biological Diversity	Management Task Force	Tiger Natural Gas, Inc.
City of Palo Alto	Los Angeles Dept of Water & Power	
	MRW & Associates	TransCanada
City of San Jose	Manatt Phelps Phillips	Troutman Sanders LLP
Clean Power Research	Marin Energy Authority	Utility Cost Management
Coast Economic Consulting	McKenzie & Associates	Utility Power Solutions
Commercial Energy		Utility Specialists
County of Tehama - Department of Public	Modesto Irrigation District	
Works	Morgan Stanley	Verizon
Crossborder Energy	NLine Energy, Inc.	Water and Energy Consulting Wellhead
Crown Road Energy, LLC	NRG Solar	Electric Company
Davis Wright Tremaine LLP		Western Manufactured Housing
Day Carter Murphy	Office of Ratepayer Advocates	Communities Association (WMA)
	OnGrid Solar	Yep Energy
Dept of General Services	Pacific Gas and Electric Company	
Don Pickett & Associates, Inc.	Peninsula Clean Energy	
Douglass & Liddell		