

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4210G
As of June 24, 2020

Subject: Proposed Procedures for Sale of the Pleasant Creek and Los Medanos Gas Storage Fields, Submitted Pursuant to Decision 19-09- 025, Ordering Paragraph 42.

Division Assigned: Energy

Date Filed: 01-31-2020

Date to Calendar: 02-05-2020

Authorizing Documents: D1909025

Disposition:	Accepted
Effective Date:	01-31-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

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AL Certificate Contact Information:

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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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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



Erik Jacobson
Director
Regulatory Relations

Pacific Gas and Electric Company
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January 31, 2020

Advice 4210-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject Proposed Procedures for Sale of the Pleasant Creek and Los Medanos Gas Storage Fields, Submitted Pursuant to Decision 19-09-025, Ordering Paragraph 42.

Purpose

This advice letter complies with Decision (D.) 19-09-025, Ordering Paragraph (OP) 42, in Pacific Gas and Electric Company's (PG&E) 2019 Gas Transmission and Storage (GT&S) Rate Case. OP 42 directs PG&E to submit procedures by which it will attempt to sell the Pleasant Creek gas storage field. PG&E proposes that the same procedures apply to the sale of the Los Medanos gas storage field, subject to the conditions described in OP 43 of D. 19-09-025, as discussed below.

Background

On November 17, 2017, PG&E filed Application 17-11-009 at the California Public Utilities Commission (CPUC or Commission) requesting that the Commission adopt its GT&S revenue requirement, cost allocation, rate design, and other service features for 2019-2021. PG&E also included a revenue requirement and rates for 2022, in the event that the Commission decided to adopt a third attrition year. As part of its application, PG&E submitted the Natural Gas Storage Strategy (NGSS), a multi-party settlement agreement proposing numerous operational and commercial changes to PG&E's natural gas storage business. Among other things, the NGSS proposed that PG&E attempt to sell or decommission two of its underground natural gas storage fields—the Pleasant Creek field and the Los Medanos field.

Under the NGSS, PG&E would first convert the Pleasant Creek and Los Medanos storage fields to production fields to avoid costly investments that would be required under regulations recently adopted by the California Geologic Energy Management Division

(CalGEM).¹ Under PG&E's proposal, during an approximately two-year period ending December 31, 2021, PG&E would produce certain customer gas and PG&E-owned gas remaining in the two fields. After this period, PG&E would cease production operations and attempt to sell the two fields. If PG&E was unable to sell the fields, it would decommission them at a forecasted cost of approximately \$89 million.²

In D.19-09-025, the Commission approved the NGSS, including sale of the Pleasant Creek and Los Medanos fields, subject to various conditions:

Pleasant Creek Field

With respect to the Pleasant Creek field, the Commission ordered PG&E to file proposed procedures for soliciting bids from potential purchasers. This advice letter is intended to comply with this directive:

Pacific Gas and Electric Company's (PG&E) proposal to sell or decommission the Pleasant Creek storage field is adopted, subject to PG&E demonstrating that it has attempted to sell the storage field. On or before January 31, 2020, PG&E must submit a Tier 1 Advice Letter proposing a plan to receive offers from potential purchasers.³

Los Medanos Field

With respect to the Los Medanos field, the Commission conditioned sale or decommissioning on PG&E demonstrating, following approximately two more years of operation through the end of 2021, that it can operate its system without the storage field:

Pacific Gas and Electric Company's (PG&E) proposal to sell or decommission the Los Medanos storage field is granted in part, subject to further action to sell the storage fields and Commission approval. PG&E must file a Tier 2 Advice Letter on December 31, 2021, or later demonstrating that PG&E has the requisite storage capacity to operate without the storage field. In the Tier 2 Advice Letter, PG&E must provide metrics to demonstrate that its storage withdrawal capacity losses do not exceed the amount that it asserts in its testimony, 40 percent. In addition, PG&E must include an analysis of supply constraints, particularly for out-of-state gas supply.⁴

¹ Effective January 1, 2020, the California Division of Oil, Gas, and Geothermal Resources (DOGGR) was renamed the California Geologic Energy Management Division.

² PG&E 2019 GT&S Rate Case, Exh. PG&E-1, pp. 11-13 and 11-14.

³ D. 19-09-025, OP 42.

⁴ *Id.*, OP 43.

Further, during the period before PG&E demonstrates that it can operate its system without the Los Medanos field, the Commission ordered PG&E to continue to maintain at least half of the capacity of the Los Medanos field's wells:

Pacific Gas and Electric Company's (PG&E) proposal to convert the storage wells at Los Medanos and Pleasant Creek storage fields into production wells starting in [*sic*] November 1, 2019, is granted in part. PG&E must maintain at least half of the gas capacity in the wells at the Los Medanos storage field until the Energy Division responds to PG&E's Tier 2 Advice Letter concerning the decommissioning of the storage field.⁵

The Commission did not explicitly require PG&E to file proposed procedures for sale of the Los Medanos field. However, it did contemplate that PG&E may engage in contingent sales activities before filing the Tier 2 advice letter due on or after December 31, 2021.⁶ Accordingly, PG&E proposes that the sales procedures outlined in this advice letter apply to both the Pleasant Creek and Los Medanos fields, with the understanding that any sale of the Los Medanos field is contingent on Commission approval of the Tier 2 advice letter PG&E is required to file on or after December 31, 2021.

Schedule for Sale of the Pleasant Creek and Los Medanos Fields

In D.19-09-025 the Commission adopted the following schedule for sale (or decommissioning) of the Pleasant Creek and Los Medanos fields:

Schedule for Sale of Pleasant Creek and Los Medanos Fields		
Date	Pleasant Creek	Los Medanos
On or after 11/1/2019	Convert to production field. (OP 48)	Convert to production field. PG&E is prohibited from reducing the capacity of the wells at the field by more than half or selling the field or starting decommissioning activities. (p. 72 and OP 48)
On or before 1/31/2020	Submit Tier 1 advice letter with plan to receive offers from potential purchasers of field. (p. 75 and OP 42)	Submit Tier 1 advice letter with plan to receive offers from potential purchasers of field. (p. 75 and COL 15)

⁵ *Id.*, OP 48.

⁶ *Id.*, p. 75. ("As part of the Tier 2 Advice Letter that PG&E must file for authorization to decommission Los Medanos, PG&E must also include a summary [of] offers from potential buyers and the reasons that PG&E declined to pursue each offer.")

Schedule for Sale of Pleasant Creek and Los Medanos Fields		
Date	Pleasant Creek	Los Medanos
Date presently unknown	CPUC approval of above Tier 1 advice letter.	CPUC approval of above Tier 1 advice letter.
Date presently unknown	Attempt to negotiate sale with interested purchasers.	Attempt to negotiate sale with interested purchasers.
Date presently unknown	If sale negotiations are successful, file Section 851 application seeking CPUC approval of sale. (p. 75)	--
1/1/2022	If no sale, start decommissioning activities. (Per NGSS)	--
On or after 12/31/2021	--	Submit Tier 2 advice letter seeking approval to sell or decommission the field. This advice letter must demonstrate that PG&E has the requisite storage capacity to operate without the field. It must also show that storage withdrawal capacity losses have not exceeded the 40% amount asserted in PG&E's testimony. And it must include an analysis of supply constraints. (OP 43) If PG&E is planning to decommission the field, it must include a summary of offers from potential purchasers and the reasons PG&E declined those offers. (p. 75)
Date presently unknown	--	CPUC approval of above Tier 2 advice letter.
Date presently unknown	--	If sale negotiations were successful, file Section 851 application seeking CPUC approval of sale. (p. 75)

Schedule for Sale of Pleasant Creek and Los Medanos Fields		
Date	Pleasant Creek	Los Medanos
Date presently unknown	--	If no sale, start decommissioning activities. (Per NGSS)

Descriptions of the Pleasant Creek and Los Medanos Fields

Pleasant Creek Field

The Pleasant Creek field is located in Yolo County near the city of Winters. It was discovered in 1948 with original gas in place of approximately 8 billion cubic feet (Bcf) at a pressure of 1,268 pounds per square inch gauge pressure (PSIG). The original owner and operator of the field was McCulloch Oil Corporation.

In 1958, PG&E acquired the then mostly-depleted gas field. In 1960, PG&E placed the field into storage service. As a storage field, it contained cushion gas of 5.1 Bcf and a design working gas capacity of 2.3 Bcf in the Peters Sand of Winters Formation, located at a depth of 4,100 feet. The field has six injection/withdrawal wells, including one horizontal well that was drilled and completed in 2012. The field was designed for maximum injections of 32 million cubic feet (MMcf) per day and maximum withdrawals of 70 MMcf per day, delivered from/to PG&E's Transmission Line 400.

Gas facilities at the field include a compressor unit K8, which is a 740 horsepower Waukesha engine driving an Ariel JGH-4 compressor installed in 2010, gas dehydration facilities, and various buildings that house these facilities. Other facilities include one office trailer, equipment storage units, roads, and fencing. Approximately two miles of transmission pipelines connect the field's six wells to the field's compression and processing facilities and to PG&E's backbone transmission system. The facility's maximum allowable operating pressure (MAOP) is 1,300 PSIG.

The Pleasant Creek field is an unmanned facility supported by personnel based at PG&E's Los Medanos field.

Los Medanos Field

The Los Medanos field is located in Contra Costa County near the city of Concord. It was discovered in 1958 with original gas in place of approximately 35 Bcf at a pressure of 1,599 PSIG. The original owners and operators of the field were Shell Oil Company and Mohawk Petroleum Company.

In 1960, PG&E acquired the then mostly-depleted gas field. In 1973, PG&E placed the field into storage service. As a storage field, it contained cushion gas of 11.2 Bcf and a

design working gas capacity of 17.9 Bcf in the Domengine Formation, located at a depth of 2,800 feet. The shallower Nortonville Formation serves as an observation formation. Sixteen injection/withdrawal wells support storage services and three observation wells are used to monitor reservoir integrity. The field was designed for maximum injections of 125 MMcf per day and maximum withdrawals of 400 MMcf per day, delivered from/to PG&E's Stanpac 3 transmission line.

Gas facilities at the field include a compressor unit K1, which is a 4,000 horsepower Cooper-Bessemer Quad integral engine/compressor unit installed in 1981, gas processing facilities, controls, backup power equipment, and various buildings that house these facilities. Other facilities include three office buildings/trailers, storage units, roads, and security systems. Approximately two miles of transmission pipelines connect the field's 19 wells to the compression and processing facilities and to PG&E's local transmission system. The facility's MAOP is 1,800 PSIG.

The Los Medanos field is a manned facility and also supports operations at PG&E's Pleasant Creek field.

Objectives of the Pleasant Creek and Los Medanos Sale Procedures

As explained above, PG&E will retire the Pleasant Creek field and either sell it or decommission it. If the Commission approves the Tier 2 Advice Letter that PG&E is required to submit on or after December 31, 2021, PG&E will also retire the Los Medanos field and either sell it or decommission it. Decommissioning is forecast to cost approximately \$89 million for both fields.⁷

The sale procedures proposed by PG&E in the next section are intended to facilitate a robust marketing effort and cast as wide a net as possible for potential buyers of the Pleasant Creek and Los Medanos fields. PG&E does not know what level of interest may exist for the two fields. However, PG&E believes interest may exist in three primary market sectors: (1) California natural gas producers who may wish to purchase the fields to produce their remaining natural gas; (2) storage operators who may wish to recertify and operate the fields as storage facilities; and (3) real estate developers who may wish to purchase the properties, decommission the fields, and develop the real estate. It is possible that additional interest may exist in sectors that involve less conventional, more innovative uses of the properties.

PG&E will seek to sell the Pleasant Creek and Los Medanos fields to the party or parties who can provide the highest economic value for the fields. In evaluating bids, PG&E will take into account not just the consideration offered, but any conditions, contingencies, or limits that may leave PG&E and its ratepayers exposed to future costs, liabilities, or risks.

⁷ See footnote 2, above.

In short, the objective of the sale procedures is to pursue the highest economic value for the fields, as measured by the consideration offered and taking into account any future costs and residual risks and liabilities. PG&E's sale procedures are described in the next section.

Procedures for the Sale of the Pleasant Creek and Los Medanos Fields

PG&E proposes the following general procedures for soliciting, receiving, and evaluating bids for the sale of the Pleasant Creek and Los Medanos fields. PG&E expects to refine and possibly modify these procedures as it further develops and conducts the sale process.

BEGIN SALE PROCESS – Letter of August 1, 2020 or 30 Days After the Commission Approves this Advice Letter

1. PG&E will send an initial sale notification via multiple channels to a broad universe of potentially interested parties.

This document will provide a detailed description of the applicable field, but will not include any confidential information, and will provide only limited amounts of technical data. PG&E will consider providing the following types of information:

- General – location, size, age, and history of field
- Land – acreage of field, specification of property boundaries, land zoning
- Natural Gas Reservoir – salient geological characteristics
- Gas – estimate of gas remaining in reservoir
- Underground Facilities – number and types of wells, depth and capacity of each well, safety equipment at each well
- Surface Facilities – compression facilities, processing facilities, cooling facilities, power generation equipment, fire suppression equipment, buildings, roads, security systems
- Pipelines – gathering lines, pipelines, meter stations
- Map – showing extent of surface property, extent of reservoir, location of wells, surface facilities, and pipelines
- Other – supply inventories, records
- Recent and Planned Work – recent, in-flight, and planned maintenance and capital activities
- Compliance Obligations – Known obligations, if any
- Environmental Issues – Known issues, if any
- Litigation – Current or pending litigation, if any

This document will also describe the overall sale process and the procedures interested parties should follow to learn more about the field and to submit a purchase offer.

PG&E expects to send this document via the following channels and to the following types of persons and entities:

- PG&E press release
 - PG&E website
 - Service list in 2019 GT&S Rate Case
 - Gas industry trade publications
 - California producers with whom PG&E has business relationships
 - California producer associations (e.g., California Independent Petroleum Association)
 - Major national natural gas producers
 - Local and national storage operators
 - Local real estate developers
 - Real estate trade publications
2. Interested parties must sign a standard nondisclosure agreement (NDA) in order to proceed.
 3. PG&E will send a prospectus to parties who have signed an NDA. The prospectus will be an in-depth document combining non-confidential information with selected confidential and technical information. PG&E expects the prospectus to help prospective buyers understand the precise property and facilities for sale, the condition of said property and facilities, and the potential quantity of natural gas remaining in the ground. The prospectus will not contain customer data. The prospectus will include the form of the purchase and sale agreement.

SUBMIT INITIAL BIDS – 90 to 120 Days After Sale Process Begins

4. Interested parties may submit initial bids no later than 90-120 days (specific amount of time still to be determined) after PG&E issues the initial sale notification (Step 1). Initial bids will be non-binding. Initial bids will be required to include at least the following information and a good faith deposit:
 - The consideration or purchase price
 - A redline document showing the extent to which the bidder accepts or does not accept the terms and conditions of PG&E's form of purchase and sale agreement
 - Any conditions, contingencies, or limits on the bid
 - Bidder's provision of a refundable good faith deposit (amount still to be determined) for the purpose of entering into negotiations with PG&E, which deposit shall be maintained if the bidder is invited to submit, and does submit, a final bid

If PG&E does not receive any viable initial bids, the sale procedures will terminate at this point.

IDENTIFY TOP THREE BIDDERS – 30 Days After Submission of Initial Bids

5. PG&E will evaluate and rank the initial bids based on highest economic value, as reasonably determined by PG&E. PG&E will assign negative adjustments to bid conditions, contingencies, or limits that diminish the face value of the bid or that expose PG&E to future risk, liabilities, or costs.
6. PG&E will notify the top three bidders, if there are three viable bids, within 30 days of submission of their initial bids (Step 4).
7. The top three bidders will be granted access to a “data room.” Such access will be subject to the same NDA previously signed by the bidder (Step 2). The data room will contain relevant available records in PG&E’s possession relating to the ownership and operation of the field. It is anticipated that the data room will contain a large amount of technical, operating, and financial data, some of which will be confidential. The data room will not contain any customer data. Parties who visit the data room will be allowed to take notes but will not be allowed to copy confidential documents.
8. PG&E will make site tours available to the top three bidders. Site tours will be conducted individually to protect the confidentiality of each participant. Persons who take the site tour will be required to provide their own personal protective equipment (PPE).

SUBMIT FINAL BIDS – 90 Days After Identification of Top Three Bidders

9. The top three bidders will be invited to submit final bids. They will be required to do so no later than 90 days after PG&E notifies them of their status as one of the top three initial bidders (Step 6). In effect, this step will provide an opportunity for the top three bidders to withdraw, modify, or maintain their initial bids. Final bids will be binding and irrevocable. In addition to the good faith deposit provided with the initial bids, final bids will be required to include at least the following information:
 - Any updated consideration or purchase price
 - Any updated redline of the terms and conditions of PG&E’s form of purchase and sale agreement
 - Any updated conditions, contingencies, or limits on the bid
 - Whether the bidder is willing to provide certain additional data (specific data still to be determined) demonstrating its ability to safely operate and/or decommission the field
10. If a party’s final bid causes the party to drop out of the top three initial bids, the fourth-ranked initial bidder, and any other initial bidders who move into the top three ranking, will be notified (Step 6), granted access to the data room (Step 7),

offered a site tour (Step 8), and invited to submit a final bid (Step 9). PG&E may perform these steps under a compressed schedule.

SELECT WINNING BID – 60 to 90 Days After Submission of Final Bids

11. Once all final bids are submitted, PG&E will evaluate the bids and select the winning bid, if any. PG&E will evaluate and rank the final bids using the same methodology used to evaluate and rank initial bids (Step 5).
12. PG&E will notify the winning bidder, if any, within 60-90 days of submission of its final bid (Step 9 or 10).

FILE SECTION 851 APPLICATION – 60 to 120 Days After Selecting Winning Bid

13. The closing of the sale of both fields will be contingent upon approval by the Commission under Public Utilities Code Section 851 (Section 851).⁸ PG&E, with support from the winning bidder, will immediately begin preparation of the Section 851 application, with the goal of filing that application 60-120 days after selection of the winning bid.

ADDITIONAL NOTES

The above procedures will apply to the sale of both the Pleasant Creek and Los Medanos fields, but the schedule will differ for the two fields.

For the Los Medanos field, PG&E may delay Step 7 and succeeding steps until after the Commission approves PG&E's Tier 2 advice letter seeking approval to sell the field.

Each prospective buyer's interest will be kept confidential. No prospective buyer will be given information about the number or identity of other prospective buyers.

PG&E plans to rigorously market the properties and consider all potential offers, as directed by D.19-09-025, but notes that sales of the Pleasant Creek and Los Medanos fields are not required by the decision. If there are no bids for the fields, or if the bids received are unacceptable based on PG&E's bid requirements and bid evaluation criteria, then PG&E will decommission the fields.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than February 20, 2020, which is 20 days after the date of this submittal. Protests must be submitted to:

⁸ D. 19-09-025, p. 75.

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 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

Pursuant to General Order (GO) 96-B, Rule 5.1, and OP 42 of D. 19-09-025, this advice letter is submitted with a Tier 1 designation. PG&E requests that this Tier 1 advice submittal become effective upon the date of submittal, which is January 31, 2020.

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 the parties shown on the attached list and the parties on the service list for Application (A.) 17-11-009. Address changes to the General



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 U39G)

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) #: 4210-G

Tier Designation: 1

Subject of AL: Proposed Procedures for Sale of the Pleasant Creek and Los Medanos Gas Storage Fields, Submitted Pursuant to Decision 19-09-025, Ordering Paragraph 42.

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.19-09-025

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: 1/31/20

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 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
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Email: PGETariffs@pge.com

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

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