

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



Pacific Gas & Electric Company
GAS (Corp ID 39)
Status of Advice Letter 4245G
As of October 14, 2021

Subject: Information-Only Submittal Regarding \$850 Million Shareholder Penalty Annual Accounting Report

Division Assigned: Energy

Date Filed: 05-01-2020

Date to Calendar: 08-16-2021

Authorizing Documents: D1504024

Disposition:	Accepted
Effective Date:	05-01-2020

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

May 1, 2020

Advice 4245-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Information-Only Submittal Regarding \$850 Million Shareholder Penalty Annual Accounting Report

Purpose

Pacific Gas and Electric Company (PG&E) submits this Informational-only advice letter to provide an annual accounting of the Shareholder Funded Gas Transmission Safety Account pursuant to the California Public Utilities Commission (CPUC or Commission) Decision (D.) 15-04-024 on Fines and Remedies to Be Imposed on Pacific Gas and Electric Company for Specific Violations in Connection with the Operation and Practices of Its Natural Gas Transmission System Pipelines (Penalty Decision).

Background

On April 9, 2015, the CPUC issued D.15-04-024, which among other items, ordered PG&E to establish the Shareholder Funded Gas Transmission Safety Account (SFGTSA) and provide a detailed accounting pursuant to Ordering Paragraph 10.

Report Summary

On December 5, 2016, the Commission issued its final 2015 Gas Transmission and Storage (GT&S) Decision (D.16-12-010) which authorized final revenue requirements for PG&E's gas transmission and storage operations for the period 2015-2018. In the decision, the Commission adopted PG&E's proposed programs and projects which met the "safety-related" definition and removed from PG&E's authorized revenue requirements amounts to be funded by shareholders.¹

The Penalty Decision directed PG&E to submit a detailed accounting annually by May 1 following the Commission's determination in PG&E's 2015 GT&S rate case (A.13-12-012). PG&E is providing its fourth annual report for the period January 1, 2019 through

¹ In D.15-04-024, p. 96, the CPUC established the definition of "safety-related" capital and expenses for purposes of fulfilling the \$850 million shareholder penalty.

December 31, 2019 in compliance with the requirements pursuant to Section 6.1 of the Penalty Decision.²

On March 8, 2019, PG&E filed a Petition for Modification (PFM) of D.16-12-010 to allow PG&E to record its remaining capital obligation of approximately \$30 million related to the remaining six programs to another safety-related program subject to the Shareholder Funded Gas Transmission Safety Account (SFGTSA) as the Company has invested in approved safety-related work above the authorized amounts so that it may close the account.

On March 3, 2020, the Commission issued D.20-02-049 denying PG&E's PFM and ordering that other proceedings would be a more appropriate venue for addressing the issues raised by PG&E's PFM. Consequently, PG&E will include in its 2023 General Rate Case Application to be filed in June 2021, a proposal to resolve the remaining shareholder obligation.

Protests

This is an information-only advice letter submittal. Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this advice letter and is not subject to protest. Instead, PG&E is reporting progress towards fulfilling the \$850 million shareholder penalty.

Effective Date

PG&E requests that this information-only advice submittal become effective May 1, 2020, the date of submittal.

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 service lists for I.11-02-016, I.11-11-009, I.12-01-007 and A.13-12-012. 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

² D.15-05-024 p.99-100

Attachment A - Pacific Gas and Electric Company's 2019 Annual Accounting Report
for \$850 Million Shareholder Penalty

cc: Service lists:

I.11-02-016 Gas Transmission System Records OII

I.11-11-009 Gas Transmission System Class Location OII

I.12-01-007 San Bruno Fire and Explosion OII

A.13-12-012 2015 GT&S Rate Case

A.17-11-009 2019 GT&S Rate Case



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 G)

Utility type:

☐ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@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) #: 4245-G

Tier Designation: Info-Only

Subject of AL: Information-Only Submittal Regarding \$850 Million Shareholder Penalty Annual Accounting Report

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.15-04-024

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: 5/1/20

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:

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

Clear Form

Advice 4245-G
May 1, 2020

Attachment A

**Pacific Gas and Electric Company's 2019 Annual
Accounting Report for \$850 Million Shareholder Penalty**

PACIFIC GAS AND ELECTRIC COMPANY

**SHAREHOLDER FUNDED REPORT
ATTACHMENT A**

**REPORTING PERIOD
JANUARY 1, 2019 – DECEMBER 31, 2019**

IN COMPLIANCE WITH CPUC DECISION 15-04-024

SUBMITTED MAY 1, 2020



PACIFIC GAS AND ELECTRIC COMPANY
SHAREHOLDER FUNDED SAFETY PROGRAMS
REPORT FOR THE PERIOD JANUARY 1, 2019 – DECEMBER 31, 2019
IN COMPLIANCE WITH CPUC DECISION 15-04-024

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**PACIFIC GAS AND ELECTRIC COMPANY
SHAREHOLDER FUNDED SAFETY PROGRAMS
REPORT FOR THE PERIOD JANUARY 1, 2019 – DECEMBER 31, 2019
IN COMPLIANCE WITH CPUC DECISION 15-04-024**

I. Introduction and Background

This Annual Shareholder Funded Report is submitted in compliance with the California Public Utilities Commission (CPUC or Commission) Decision (D.) 15-04-024 *on Fines and Remedies to Be Imposed on Pacific Gas and Electric Company for Specific Violations in Connection with the Operation and Practices of Its Natural Gas Transmission System Pipelines* (Penalty Decision).¹ Pacific Gas and Electric Company (PG&E) submits this annual accounting of the Shareholder-Funded account, as an information-only filing pursuant to the requirements of Section 6.1 set forth in D.15-04-024. This Annual Shareholder Funded Report is the fourth report following the Commission's Phase II decision (D.16-12-010) in PG&E's 2015 GT&S rate case and reflects the reporting period of January 1, 2019 through December 31, 2019.²

As described in PG&E's Annual Shareholder Funded Report for the year 2018, PG&E completed the shareholder-funded obligation for expense programs, but only met the shareholder-funded obligation for 15 of the 21 capital programs as of December 31, 2018, the end of the 2015 GT&S rate case period.

On March 8, 2019, PG&E filed a Petition for Modification (PFM) of D.16-12-010 to allow PG&E to record its remaining capital obligation of approximately \$30 million related to the remaining six programs to another safety-related program subject to the Shareholder Funded Gas Transmission Safety Account (SFGTSA) that the Company has already invested in approved safety-related work above the authorized amount so that it may close the account.

On March 3, 2020, the Commission issued D.20-02-049 denying PG&E's PFM and ordering that other proceedings would be a more appropriate venue for addressing the issues raised by PG&E's PFM. Additionally, as the Commission has adopted forecasts for safety-related programs in PG&E's 2019 GT&S rate case in D.19-09-025, and this issue was not determined in the development of those adopted forecasts, PG&E does not have authority to continue meeting its obligation towards the capital safety spend penalty during the 2019-2022 rate case period.

As a result of D.20-02-049 and the absence of the authority by the Commission for PG&E to continue satisfying the remaining capital obligations during the 2019

¹ D.15-04-024, Conclusion of Law 45.

² PG&E's first Shareholder Funded Report for the period January 1, 2015 – December 31, 2016 was submitted on May 1, 2017. PG&E's second Shareholder Funded Report for the period January 1, 2017 – December 31, 2017 was submitted on May 1, 2018. PG&E's third Shareholder Funded Report for the period January 1, 2018 – December 31, 2018 was submitted on May 1, 2019.

GT&S rate case period, PG&E is not authorized to record additional safety-related capital investments during 2019-2022 to the SFGTSA.³

Pursuant to D.20-02-049, PG&E plans to include in its 2023 General Rate Case (GRC)⁴ a proposal for satisfying the remaining capital obligation related to D.15-04-024 and continue to report on satisfying the San Bruno penalty in its annual May 1 Shareholder Funding Safety Programs report.⁵

II. Gas Safety-Related Programs Authorized in 2015 GT&S Decision (D.16-12-010) and Funded by PG&E Shareholders

On April 9, 2015, the Commission issued D.15-04-024 which addressed three investigations relating to: (1) PG&E's safety recordkeeping for its natural gas transmission system; (2) PG&E's operation of its natural gas transmission pipeline system in or near locations of higher population density; and (3) PG&E's pipeline installation, integrity management, recordkeeping and other operational practices, and other events or courses of conduct, that could have led to or contributed to the natural gas explosion that occurred in the City of San Bruno, California, on September 9, 2010. The Penalty Decision, among other items, required that PG&E establish the SFGTSA to record an \$850 million shareholder obligation and track expenditures for designated safety-related projects or programs to be funded by shareholders as determined in PG&E's 2015 GT&S rate case. The shareholder-funded obligation is allocated 19 percent to expense and 81 percent to capital expenditures. The Penalty Decision also directed PG&E to track gas transmission system expenditures within two sub accounts of the SFGTSA: one subaccount, not to exceed \$161.5 million for expense, and one subaccount to track capital expenditures.

On May 20, 2015, PG&E submitted Advice 3596-G to request authority to establish Preliminary Statement Part DK - SFGTSA. On December 22, 2015, the Commission issued Resolution G-3509 which ordered modifications to PG&E's proposed language. On December 31, 2015, PG&E submitted supplemental Advice 3596-G-A which replaced Advice 3596-G in its entirety. PG&E's supplemental advice letter was approved by Energy Division on March 7, 2016.

The Commission deferred to PG&E's 2015 GT&S rate case (A.13-12-012) its determination as to which authorized expense and capital programs are safety-related and should be funded by shareholders.⁶ On December 1, 2016, the Commission approved final revenue requirements in PG&E 2015 GT&S rate case in D.16-12-010. In addition, the Commission adopted a list of safety-related programs and projects which met the Commission's definition of safety related and

³ The \$850 million penalty has already been removed from PG&E's authorized revenue requirements starting from PG&E's 2015 GT&S rate case. These decisions merely effectuate accounting adjustments into the SFGTSA.

⁴ D.20-01-002, OP 4, directs PG&E to incorporate its requests for test year 2023 revenue requirements related to its GT&S systems into its test year 2023 GRC.

⁵ D.20-02-049, pp. 3-4, PG&E Reply at pp. 2-3.

⁶ D.16-12-010, p. 6.

established the capital and expense programs and amounts to be funded by PG&E shareholders during the 2015-2018 rate case cycle.⁷ The Commission adopted a forecast expense and capital expenditures by year in order to remove these amounts from PG&E's authorized revenue requirements for 2015-2018.⁸ Additionally, the Commission determined that these amounts would be removed from PG&E's rate base, such that ratepayers will not be responsible for any depreciation, or rate of return on these capital amounts. Table 1 provides a summary of Expense Programs and Table 2 provides a summary of Capital Programs and the shareholder penalty allocated to each program.

TABLE 1
SHAREHOLDER FUNDED EXPENSE PENALTY
(AMOUNTS SHOWN IN THOUSANDS)

Line	Chapter	Chapter Name	Program	Shareholder Penalty
1	4A	Transmission Pipe Integrity and Emergency Response Programs	Hydrostatic Testing	\$100,927
2	7	Corrosion Control Program	Casings	39,592
3	8	Gas Transmission System Operations and Maintenance	Expense Programs	<u>20,981</u>
4		Total Expense		<u><u>\$161,500</u></u>

⁷ D.16-12-010, Appendix A.

⁸ D.16-12-010, p. 3.

TABLE 2
SHAREHOLDER FUNDED CAPITAL PENALTY
(AMOUNTS SHOWN IN THOUSANDS)

Line	Chapter	Chapter Name	Program/Sub-Programs	Shareholder Penalty
1	4A	Transmission Pipe Integrity and Emergency Response Programs	Traditional ILI	92,157
2			Non-Traditional ILI	11,500
3				103,658
4			Hydrotest – LNG/CNG Cost	4,864
5			Hydrostatic Testing	35,210
6				40,074
7			Earthquake Fault Crossings	8,268
8			Vintage Pipe Replacement	236,327
9			Geo-Hazard Threat Identification	12,336
10			Valve Automation	69,412
11			Inoperable & Hard to Operate Valves	11,003
12				481,077
13	4B	Transmission Pipe Engineering Programs	Class Location Program	28,014
14			Water and Levee Crossing	21,959
15			Shallow Pipe Program	28,309
16				78,282
17	6	Asset Family – Facilities	Gas Transmission SCADA Visibility	9,314
18			Routine Capital Spending - M&C	33,764
19				43,079
20	7	Corrosion Control	CP Systems - Replace	5,353
21			CP Systems - New	13,472
22			Coupon Test Stations	1,932
23			AC Interference Mitigation	7,467
24			DC Interference Mitigation	1,322
25			Casings	27,951
26			Internal Corrosion	879
27				58,375
28	9	Program Management Office	Program Management Office	10,709
29	10	Gas System Operations	Capacity	16,979
30		Total Capital Expenditures		\$688,501

III. Shareholder Funded Gas Transmission Safety Account

The SFGTSA is an account authorized by the Commission for PG&E to track PG&E's shareholder obligation for expense and capital incurred on or after January 1, 2015, against the safety-related programs or projects designated in D.16-12-010 Appendix G, Tables 1 and 2. The \$850 million penalty is allocated \$688.5 million to capital and \$161.5 million to expense and is tracked in two corresponding subaccounts. Amounts recorded in the SFGTSA are not recoverable from customers.

Amounts recorded in the SFGTSA are limited to the lesser of: (1) the amount authorized (including any contingency); or (2) the amount expended. In the event

the actual amount spent on safety-related expense work is less than \$161.5 million by the end of the 2015 GT&S rate case cycle, the remaining unspent amount is transferred to increase the amount funded by shareholders for capital expenditures.⁹ Underspending in capital expenditures does not result in an increase in the amount funded by shareholders for expense work.

A. Shareholder Funded Expense Programs

As of December 31, 2018, PG&E completely met the shareholder-funded obligation for expense programs, as summarized in Table 3, Shareholder Funded Expense Programs, below.

TABLE 3
SHAREHOLDER FUNDED EXPENSE PROGRAMS
(DOLLAR AMOUNTS SHOWN IN THOUSANDS)

Chapter	Expense Program	Penalty Cap	Penalty Cap Reached
4A	Hydrostatic Testing	\$100,927	Yes
7	Casings ⁽¹⁾	39,592	Yes ⁽¹⁾
8	Expense Projects	20,981	Yes
Total		<u>\$161,500</u>	

- (1) The Shareholder expenses for Casings were below the adopted penalty of \$39,592 at the end of the 2015 GT&S rate case cycle. As a result, the underspent amount of \$10,292 was added to the capital subaccount of the SFGTSA in accordance with Gas Preliminary Statement Part DK.

See PG&E's report for the period January 1, 2018 – December 31, 2018 for Expense Accounting Detail and a discussion on disallowances or recoverable expense limits.

B. Shareholder Funded Capital Programs

Shareholder Funded Capital Programs are summarized in Table 4 below. As of December 31, 2018, PG&E met the shareholder-funded obligation for 15 of the 21 capital programs.¹⁰ The shareholder-funded obligation has not been met for the remaining six capital programs—Earthquake Fault Crossings, Geo-hazard Threat Identification, Water and Levee Crossing Program, Gas Transmission SCADA Visibility, Internal Corrosion, and Capacity—with a remaining obligation totaling approximately \$30 million.

The following table shows the amount of capital expenditures for projects that are operative after January 1, 2015 and are applied towards meeting the penalty caps.

⁹ D.15-04-024, p. 97.

¹⁰ PG&E is counting the Traditional ILI and Non-Traditional ILI programs as one "TIMP" program for purposes of this report.

TABLE 4
SHAREHOLDER FUNDED CAPITAL PROGRAMS
(DOLLAR AMOUNTS SHOWN IN THOUSANDS)

Line	Chapter	Programs	Shareholder Penalty	PMO Allocation	Casings Exp Underspend to Casings Capital Program Cap (1)	Adjusted Shareholder Penalty	Capital Additions Applied to Shareholder Penalty As of 12/31/2018	Date Penalty Fulfilled
1	4A	Traditional ILI Cost	92,157					
2	4A	Non-Traditional ILI Cost	11,500					
3	4A	TIMP	103,657			103,657	103,657	02/2016
4	4A	Hydrotest - LNG/CNG Cost	4,864	91		4,955	4,955	06/2017
5	4A	Hydrostatic Testing	35,210	656		35,866	35,866	08/2016
6	4A	Earthquake Fault Crossings	8,268	154		8,422	7,971	N/A
7	4A	Vintage Pipe Replacement	236,327	4,408		240,735	240,735	08/2017
8	4A	Geo-hazard Threat Identification	12,336	230		12,566	10,444	N/A
9	4A	Valve Automation	69,412	1,295		70,707	70,707	11/2017
10	4A	Inoperable and Hard to Operate Valves	11,003	205		11,208	11,208	07/2015
11	4B	Class Location Program	28,014	523		28,537	28,537	09/2017
12	4B	Water and Levee Crossing Program	21,959	410		22,369	21,656	N/A
13	4B	Shallow Pipe Program	28,309	528		28,837	28,837	11/2018
14	6	Gas Transmission SCADA Visibility	9,314	174		9,488	748	N/A
15	6	Routine Capital Spending - M&C	33,764	630		34,394	34,394	12/2017
16	7	CP Systems - Replace	5,353	100		5,453	5,453	07/2017
17	7	CP Systems - New	13,472	251		13,723	13,723	08/2018
18	7	Coupon Test Stations	1,932	36		1,968	1,968	10/2016
19	7	AC Interference Mitigation	7,467	139		7,606	7,606	03/2017
20	7	DC Interference Mitigation	1,322	25		1,347	1,347	06/2017
21	7	Casings	27,951	521	10,292	38,764	38,764	04/2018 (1)
22	7	Internal Corrosion	879	16		895	652	N/A
23	9	Program Management Office	10,709	(10,709)		-	-	
24	10	Capacity	16,979	317		17,296	-	N/A
			688,501	-	10,292	698,793	669,228	

(1) Because the Casings Expense safety spend fell short by \$10.292 million, PG&E is required to add that to the Capital Safety Spend Penalty Disallowance. As a result, the date the penalty was fulfilled changed from 08/2016 to 04/2018.

See PG&E's report for the period January 1, 2018 – December 31, 2018 for Capital Accounting Detail and a discussion on disallowances or recoverable capital limit.

IV. Conclusion

As of December 31, 2018, PG&E met the \$161.5 million shareholder expense penalty obligation and met the capital penalty cap for 15 of the 21 capital programs identified in D.16-12-010. PG&E plans to include in its 2023 GRC a proposal for satisfying the remaining capital obligation related to D.15-04-024.

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