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December 1, 2010

Advice 3171-G

(Pacific Gas and Electric Company ID U 39 G)

Public Utilities Commission of the State of California

Subject: Establish Gas Preliminary Statement CH, *Natural Gas Transmission Pipeline Safety Memorandum Account*

Pacific Gas and Electric Company (PG&E) hereby submits this Advice Letter to establish Gas Preliminary Statement CH, the *Natural Gas Transmission Pipeline Safety Memorandum Account (NGTPSMA)*.

Purpose

PG&E files this Advice Letter seeking a memorandum account to track costs associated with 1) programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety and 2) new or enhanced PG&E transmission pipeline safety programs. The purpose of this memorandum account is to allow PG&E to record and track expenses incurred in implementing these programs. PG&E is not seeking cost recovery for these programs at this time. Any cost recovery will be addressed either in a future California Public Utilities Commission (Commission or CPUC) proceeding or pursuant to a future PG&E application.

Background

On September 9, 2010, a rupture occurred on PG&E's natural gas transmission line 132, which runs through San Bruno, California. PG&E continues to work with the National Transportation Safety Board (NTSB), the Commission and other officials, to investigate the cause of this tragic event and evaluate new measures that may be implemented to enhance and improve the safety of PG&E's natural gas transmission system. PG&E anticipates that, in connection with these reviews, it may be ordered to implement new gas transmission pipeline safety procedures or programs.

PG&E has also launched Pipeline 2020, a program designed to enhance the safety of the utility's natural gas transmission system.

Pipeline 2020 will focus PG&E's efforts in five major areas:

- *Modernize Critical Pipeline Infrastructure*
PG&E will consult with regulators and engage industry experts on a multiyear modernization initiative to upgrade key gas transmission pipeline segments located in heavily populated and other critical areas. The company will work with an independent third-party expert to review and assess PG&E's long-term roadmap, including criteria for prioritizing critical pipeline segments. Among the goals of the initiative will be to ensure that all upgraded lines can accommodate state-of-the-art inspections, including those using pigging technologies.
- *Expand the Use of Automatic or Remotely Operated Shut-Off Valves*
PG&E also proposes to consult with regulators and industry experts about expanding the use of automatic or remotely operated shut-off valves on segments of its gas transmission pipelines. The valves will give PG&E operators the capability to shut off gas flows without having to dispatch crews. The company will also work with state and federal legislators to ensure industry-wide use of best available technologies and practices in this area. To further this analysis PG&E intends to proceed with a pilot project to evaluate and install new automated valves in the first half of 2011.
- *Spur Development of Next-Generation Inspection Technologies*
To help catalyze technological advances that will improve pipeline safety nationally, PG&E has established an independent, nonprofit entity dedicated to researching and developing next-generation pipeline inspection and diagnostic tools. At no cost to customers, PG&E will provide the first \$10 million to launch this organization, which will work with other industry partners, leading institutions and researchers with the expertise to make significant advances in this area.
- *Develop Industry-Leading Best Practices*
PG&E will closely review its practices related to pipeline integrity, safety and training – as well as practices used elsewhere in the industry – in order to develop industry-leading standards of excellence in this area. For example, the company will ensure that it is using state-of-the-art risk assessment techniques for prioritizing and planning work on its transmission pipelines.
- *Enhance Public Safety Partnerships*
Building on its already-extensive pipeline safety awareness and training programs, PG&E will work with local communities, public officials and first responders to forge model partnerships in support of pipeline safety. The company will provide detailed, customized information on pipeline locations and emergency response plans, as well as enhanced annual emergency response training. It will also step up outreach and education to reduce the incidence of third-party dig-ins on PG&E's pipelines – the leading threat to pipeline safety and integrity.

Proposed Preliminary Statement

PG&E is requesting Commission authority to establish Gas Preliminary Statement CH, the NGTPSMA for gas (NGTPSMA-G), and record the costs of 1) programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety and 2) new or enhanced PG&E transmission pipeline safety programs.

PG&E proposes to establish the following sub-accounts to track and record costs of separate programs in the NGTPSMA:

1) Pipeline Modernization: This sub-account will track the costs associated with developing and implementing new criteria for pipeline replacements and modernization and will include the tracking of costs associated with enhanced record systems for verification of pipeline and valve data.

2) Automated Shut-Off Valves: This sub-account will track the costs associated with the use of automatic or remotely operated shut-off valves on segments of its gas transmission pipelines and enhancements in the automation of PG&E's SCADA system, including the 2011 automated valve project described in Brian Cherry's October 25, 2010 letter to Executive Director Paul Clanon.

3) Pipeline Inspection and Retrofits: This sub-account will track the costs associated with developing and implementing new standards and procedures for pipeline inspections, including pipeline retrofits necessary to facilitate "pigging" of transmission pipelines.

4) Emergency Response and Public Safety: This sub-account will track the costs associated with enhancing public safety programs and emergency response plans, including providing detailed information on pipeline locations to local communities, enhancing emergency response training and increasing education programs to reduce the risk of third-party dig-ins.

5) New Governmental and Regulatory Requirements Not Covered Above: This sub-account will track the costs associated with programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety not captured in sub-accounts 1- 4.

Limited Nature Of Memorandum Account

PG&E seeks authority only to track costs associated with new or expanded natural gas pipeline safety programs and requirements. The memorandum account does not authorize or address future recovery of these costs in customer rates. Issues surrounding cost recovery will be addressed in a future Commission proceeding or in conjunction with a future PG&E application. PG&E will seek recovery of costs tracked in the NGTPSMA in its natural gas transmission rates only to the extent that it is

authorized to do so by the Commission consistent with its obligations under Section 12 (“Rate Certainty and Adjustments During Term of Settlement”) of the Gas Accord V Settlement Agreement (CPUC Application 09-09-013). Settling parties retain all rights to contest any future request to recover costs tracked in the NGTPSMA.

Regulatory Authority

PG&E seeks authority to establish the NGTPSMA to track and record costs pursuant to Public Utilities Code Sections 451, 701 and 728. The Commission has previously authorized the tracking of costs in a memorandum account through the procedural device of an advice letter filing.¹

In Resolution G-3432 (April 16, 2009), the Commission authorized PG&E to establish a memorandum account (filed by advice letter) to track the revenue requirement associated with the Market Decision Support System database platform replacement project as proposed in PG&E’s 2009-2011 Energy Efficiency Portfolio and Demand Response Applications.

In approving the memorandum account, the Commission stated:

Memorandum accounts record and track particular costs for capital projects, but do not provide a guaranteed authorization to meet expenditures using ratepayer funds. Ratepayer funds may be used at a later time, but only after Commission review and authorization of the project. Under a memorandum account, PG&E shareholders are at risk for any and all expenditures, should the Commission deny some or all parts of the project. (Resolution G-3432, pp. 3-4)

It is reasonable to establish the NGTPSMA because the account will allow PG&E to comply with new natural gas transmission pipeline safety mandates or requirements in a way that preserves its ability to seek appropriate cost recovery. PG&E has been confronted by extraordinary circumstances as it responds to the San Bruno tragedy. In coordination with the NTSB, CPUC and other governmental authorities, it intends to move forward with safety enhancements relating to its natural gas pipeline system. The NGTPSMA will facilitate a transparent review and accounting of the costs of implementing new pipeline safety mandates and the expenditures associated with PG&E’s Pipeline 2020 program for future Commission review. At this time, PG&E is requesting authority only to record and track pipeline safety expenditures for Commission review in a future proceeding. PG&E’s shareholders will be at risk for any expenditures not approved by the Commission in a subsequent proceeding or order.

¹ The Commission approved PG&E Advice 2632-G-B and 2664-E-B, which authorized PG&E to establish two new memorandum accounts to track the pre-deployment expenditures associated with the Advanced Metering Infrastructure Project prior to Commission authorization of the program in a separate application. (Approved September 20, 2005)

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than **December 21, 2010**, which is 20 days after the date of this filing. Protests should be mailed to:

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: jnj@cpuc.ca.gov and mas@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 also should be sent via U.S. mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

Jane K. Yura
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10B
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-6520
E-mail: PGETariffs@pge.com

Effective Date

PG&E requests that this Tier 3 advice filing become effective as of December 1, 2010, so that the costs can be tracked in the NGTPSMA.

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 lists for A.09-09-013 and A.09-12-020. Address changes to the General Order 96-B service list should be directed to e-mail 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>.

Jane Yura - OB

Vice President - Regulation and Rates

cc: Service Lists for A.09-09-013 and A.09-12-020

Attachments

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: Olivia Brown

Phone #: 415.973.9312

E-mail: oxb4@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
 PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 3171-G

Tier: 3

Subject of AL: Establish Gas Preliminary Statement CH, Natural Gas Transmission Pipeline Safety and Reliability Memorandum Account

Keywords (choose from CPUC listing): Memorandum Account

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: N/A

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: N/A

Resolution Required? Yes No

Requested effective date: December 1, 2010

No. of tariff sheets: 5

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). N/A

Tariff schedules affected: New Gas Preliminary Statement Part CH

Service affected and changes proposed: 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:

CPUC, Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Ave., San Francisco, CA 94102
ijn@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company
Attn: Jane K. Yura, Vice President, Regulation and Rates
77 Beale Street, Mail Code B10B
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

**ATTACHMENT 1
Advice 3171-G**

**Cal P.U.C.
Sheet No.**

Title of Sheet

**Cancelling Cal
P.U.C. Sheet No.**

28644-G NATURAL GAS TRANSMISSION PIPELINE
SAFETY AND RELIABILITY MEMORANDUM
ACCOUNT
Sheet 1

28645-G NATURAL GAS TRANSMISSION PIPELINE
SAFETY AND RELIABILITY MEMORANDUM
ACCOUNT
Sheet 2

28646-G NATURAL GAS TRANSMISSION PIPELINE
SAFETY AND RELIABILITY MEMORANDUM
ACCOUNT
Sheet 3

28649-G GAS TABLE OF CONTENTS
Sheet 1

28637-G

28650-G GAS TABLE OF CONTENTS
Sheet 5

28425-G



**NATURAL GAS TRANSMISSION PIPELINE SAFETY AND
 RELIABILITY MEMORANDUM ACCOUNT**

Sheet 1 (N)

CH. NATURAL GAS TRANSMISSION PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNT(NGTPSRMA)

(N)
 (N)

1. PURPOSE: The purpose of the Natural Gas Transmission Pipeline Safety Memorandum Account (NGTPSMA-G) is to record costs associated with 1) programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety and 2) new or enhanced PG&E transmission pipeline safety programs. This memorandum account shall only track costs associated with new or expanded natural gas pipeline safety programs and requirements. It does not authorize or address future recovery of these costs in customer rates. Issues surrounding cost recovery will be addressed in a future Commission proceeding or in conjunction with a future PG&E application. PG&E shall seek recovery of costs tracked in the NGTPSMA in its natural gas transmission rates only to the extent that it is authorized to do so by the Commission consistent with its obligations under Section 12 ("Rate Certainty and Adjustments During Term of Settlement") of the Gas Accord V Settlement Agreement (CPUC Application 09-09-013).
2. APPLICABILITY: The NGTPSMA-G shall apply to all gas customers except for those specifically excluded by the Commission.
3. REVISION DATE: Disposition of the balance in the account shall be determined by the Commission in a future proceeding or pursuant to a future PG&E application.
4. RATES: The NGTPSMA-G does not have a separate rate component.
5. ACCOUNTING PROCEDURE: The NGTPSMA-G consists of the following five subaccounts:

(N)

a. Pipeline Modernization Memorandum Subaccount (PMMS)

The "Pipeline Modernization Memorandum Subaccount" purpose is to track the costs associated with developing and implementing new criteria for pipeline replacements and modernization and will include the tracking of costs associated with enhanced record systems for verification of pipeline and valve data

The following entries will be made to this subaccount each month or as applicable:

- i. A debit entry equal to costs associated with the developing and implementing new criteria for pipeline replacements and modernization.
- ii. A debit entry equal to the costs associated with enhanced record systems for verification of pipeline and valve data.
- iii. A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

(N)

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Advice Letter No: 3171-G
 Decision No.

Issued by
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Date Filed December 1, 2010
 Effective _____
 Resolution No. _____



**NATURAL GAS TRANSMISSION PIPELINE SAFETY AND
 RELIABILITY MEMORANDUM ACCOUNT**

Sheet 2 (N)

CH. NATURAL GAS TRANSMISSION PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNT (NGTPSRMA) (Cont'd.)

(N)
 (N)

5. ACCOUNTING PROCEDURE: (Cont'd.)

(N)

b. Automated Shut-off Valves Memorandum Subaccount (ASVMS)

The "Automated Shut-off Valves Memorandum Subaccount" purpose is to track the costs associated with the use of automatic or remotely operated shut-off valves and associated SCADA on segments of its gas transmission pipelines, including the 2011 automated valve pilot project.

The following entries will be made to this subaccount each month or as applicable:

- i. A debit entry equal to costs associated with the use of automatic or remotely operated shut-off valves and associated SCADA on segments of its gas transmission pipelines.
- ii. A debit entry equal to the cost for the 2011 automated valve pilot project.
- iii. A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

c. Pipeline Modernization Memorandum Subaccount (PMMS)

The "Pipeline In-line Inspection and Retrofit Memorandum Subaccount" purpose is to track the costs associated with developing and implementing new standards and procedures for pipeline inspections, including pipeline retrofits necessary to facilitate "pigging" of transmission pipelines.

The following entries will be made to this subaccount each month or as applicable:

- iv. A debit entry equal to costs associated with the developing and implementing new standards and procedures for pipeline inspections, including, but not limited to, pipeline retrofits.
- v. A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

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Advice Letter No: 3171-G
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 Effective _____
 Resolution No. _____



**NATURAL GAS TRANSMISSION PIPELINE SAFETY AND
 RELIABILITY MEMORANDUM ACCOUNT**

Sheet 3 (N)

CH. NATURAL GAS TRANSMISSION PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNT (NGTPSRMA) (Cont'd.)

(N)
 (N)

5. ACCOUNTING PROCEDURE: (Cont'd.)

(N)

d. Pipeline In-line Inspection and Retrofit Memorandum Subaccount (PIIRMS)

The "Emergency Response and Public Safety Memorandum Subaccount" purpose is to track the costs associated with enhancing public safety programs and emergency response plans, including providing detailed information on pipeline locations to local communities, enhancing emergency response training and increasing education programs to reduce third-party dig-ins.

The following entries will be made to this subaccount each month or as applicable:

- i. A debit entry equal to costs associated with enhancing public safety programs and emergency response plans.
- ii. A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

e. Emergency Response and Public Safety Memorandum Subaccount (ERPSMS)

The "New Governmental and Regulatory Requirements Memorandum Subaccount" purpose is to track the costs associated with programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety not captured in subaccounts a-d.

The following entries will be made to this subaccount each month or as applicable:

- iii. A debit entry equal to any costs associated with programs to implement new governmental and regulatory mandates and requirements applicable to natural gas transmission pipeline safety not captured in subaccounts a-d.
- iv. A debit or credit entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the above entry, at a rate equal to one-twelfth of the rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor.

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(Continued)

Advice Letter No: 3171-G
 Decision No.

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Date Filed December 1, 2010
 Effective _____
 Resolution No. _____



GAS TABLE OF CONTENTS

Sheet 1

TITLE OF SHEET	CAL P.U.C. SHEET NO.	
Title Page.....	28649-G	(T)
Rate Schedules	28638,28639-G	
Preliminary Statements.....	28640,28650-G	(T)
Rules.....	28564-G	
Maps, Contracts and Deviations.....	28468-G	
Sample Forms	27715,28300,27262,28314,28503-G	

(Continued)

Advice Letter No: 3171-G
 Decision No.

Issued by
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 Regulation and Rates

Date Filed December 1, 2010
 Effective _____
 Resolution No. _____



GAS TABLE OF CONTENTS

Sheet 5

PART	TITLE OF SHEET	CAL P.U.C. SHEET NO.
Preliminary Statements		
Part AC	Catastrophic Event Memorandum Account.....	14178,14179-G
Part AE	Core Pipeline Demand Charge Account.....	23301-G
Part AG	Core Firm Storage Account.....	23280-G
Part AN	Hazardous Substance Mechanism.....	23281-23283,16693-16694-G
Part AW	Self-Generation Program Memorandum Account	24767-G
Part BA	Public Purpose Program-Energy Efficiency.....	23360-23361-G
Part BB	Public Purpose Program Memorandum Account	23362-23363-G
Part BH	Public Purpose Program Surcharge-Low Income Energy Efficiency Balancing Account.....	23 364-G
Part BI	Public Purpose Program Surcharge-Research, Development and Demonstration Balancing Account.....	23365,23366-G
Part BL	Noncore Distribution Fixed Cost Account.....	28415-G
Part BP	SmartMeter Project Balancing Account-Gas	24123-24124-G
Part BQ	Pension Contribution Balancing Account	24853,24224-G
Part BS	Climate Balancing Account.....	24741-G
Part BT	Non-Tariffed Products and Services Balancing Account.....	26710-G
Part BX	Wildfire Expense Memorandum Account.....	27806-G
Part BW	Energy Efficiency 2009 – 2011 Memorandum Account.....	28304,27419-G
Part BY	On-Bill Financing Balancing Account (OBFBA).....	28305-G
Part BZ	Gas Disconnection Memorandum Account.....	28046-G
Part CA	California Solar Initiative Thermal Program Memorandum Account.....	28059,28060
Part CB	CARE/TANF Balancing Account.....	28103-G
Part CC	Sempra and Price Indexing Cases Gas Settlement Refund Memorandum Account (SPGSRMA).....	28111-G
Part CD	Smartmeter Evaluation Memorandum Account – Gas.....	28120-G
Part CH	Natural Gas Transmission Pipeline Safety and Reliability Memorandum Account.....	28644-28646-G

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 (N)

(Continued)

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 Effective _____
 Resolution No. _____

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

Alcantar & Kahl LLP	Division of Business Advisory Services	Occidental Energy Marketing, Inc.
Ameresco	Douglass & Liddell	OnGrid Solar
Anderson & Poole	Downey & Brand	Praxair
Arizona Public Service Company	Duke Energy	R. W. Beck & Associates
BART	Dutcher, John	RCS, Inc.
Barkovich & Yap, Inc.	Economic Sciences Corporation	Recurrent Energy
Bartle Wells Associates	Ellison Schneider & Harris LLP	SCD Energy Solutions
Bloomberg	Foster Farms	SCE
Bloomberg New Energy Finance	G. A. Krause & Assoc.	SMUD
Boston Properties	GLJ Publications	SPURR
	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Public Utilities Commission
Braun Blaising McLaughlin, P.C.	Green Power Institute	Santa Fe Jets
Brookfield Renewable Power	Hanna & Morton	Seattle City Light
CA Bldg Industry Association	Hitachi	Sempra Utilities
CLECA Law Office	In House Energy	Sierra Pacific Power Company
CSC Energy Services	International Power Technology	Silicon Valley Power
California Cotton Ginners & Growers Assn	Intestate Gas Services, Inc.	Silo Energy LLC
California Energy Commission	Lawrence Berkeley National Lab	Southern California Edison Company
California League of Food Processors	Los Angeles Dept of Water & Power	Spark Energy, L.P.
California Public Utilities Commission	Luce, Forward, Hamilton & Scripps LLP	Sunshine Design
Calpine	MAC Lighting Consulting	Sutherland, Asbill & Brennan
Casner, Steve	MBMC, Inc.	Tabors Caramanis & Associates
Chris, King	MRW & Associates	Tecogen, Inc.
City of Palo Alto	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
City of Palo Alto Utilities	McKenzie & Associates	TransCanada
Clean Energy Fuels	Merced Irrigation District	Turlock Irrigation District
Coast Economic Consulting	Modesto Irrigation District	United Cogen
Commercial Energy	Morgan Stanley	Utility Cost Management
Consumer Federation of California	Morrison & Foerster	Utility Specialists
Crossborder Energy	NLine Energy, Inc.	Verizon
Davis Wright Tremaine LLP	NRG West	Wellhead Electric Company
Day Carter Murphy	Navigant Consulting	Western Manufactured Housing Communities Association (WMA)
		eMeter Corporation
Defense Energy Support Center	Norris & Wong Associates	
Department of Water Resources	North America Power Partners	
Dept of General Services	North Coast SolarResources	