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July 1, 2011

Advice 3222-G

(Pacific Gas and Electric Company ID U39G)

Public Utilities Commission of the State of California

**Subject: Request for Expedited Approval to Implement Program
Enhancements to PG&E's Winter Gas Savings Program for
Residential and Commercial Gas Customers**

Public Utilities Commission of the State of California

Pacific Gas and Electric Company (PG&E) hereby submits for filing revisions to its gas tariffs. The affected tariff sheets are listed on the enclosed Attachment 1.

Purpose

PG&E requests the California Public Utilities Commission's (Commission's) approval to implement two improvements to its natural gas conservation program -- the Winter Gas Savings Program (WGSP). PG&E's proposed program enhancements will improve the precision of bill credit calculations and will continue to reward customers' gas conservation efforts. PG&E proposes to absorb the costs of these program improvements in the previously authorized revenue requirement approved in Advice Letter 3130-G-A.

PG&E's evaluation of the 2011 WSGP season identified two technical enhancements that can enable more equitable treatment of customers and improve the precision of the program. First, PG&E proposes to create nine distinct weather adjustment factors (WAFs), one for each baseline territory (or climate zone), along with 21 new WAFs, one for each serial billing cycle. The implementation of the climate zone enhancement for each serial billing WAF is a critical component of improving program precision. Second, PG&E proposes to better match gas conservation incentives by aligning the program start and end dates with the two coldest months in the service territory (December and January). Since the WGSP was authorized for a three-year period (2011-2013), PG&E's proposed improvements require changes to the existing program. These program enhancements will be in place in 2012 and continue through 2013 so that customers will benefit for the remaining two years of the program and beyond.

An approval of this advice letter in late summer 2011 will give PG&E sufficient time to make the necessary technical changes and begin the campaign to encourage customers to conserve before the start of the next program cycle in winter 2012. Therefore, PG&E respectfully requests the Commission adopt these program modifications by **August 1, 2011**.

Background

The CPUC, through Advice Letter (AL) 3130-G-A, effective September 22, 2010, approved the program and cost recovery mechanism for 2011-2013, allowing continuation of the WGSP for three years¹. The WGSP was designed to provide relief to residential and commercial customers from expected high winter gas bills by providing a direct monetary incentive for customers to conserve and reduce their natural gas use. The WGSP rewards customers who reduce their cumulative gas use by 10 percent or more from January 1 through the end of February of the eligible program year with a gas bill credit of 20 percent². If a customer's gas conservation is below 10 percent, the customer receives a one-to-one credit (e.g. reduce usage by 5 percent, earn a 5 percent credit). PG&E residential and commercial customers on Gas Rate Schedules G-1, G-1 NGV, GM, GS, GT, GL-1, GL1-NGV, GML, GSL, GTL, G-CT3, G-NR1, and G-NR2 are eligible for the WGSP⁴.

During the 2011 winter, residential and commercial customers saved an average of \$26 and 42 therms, as compared to their own three-year average. Customers' overall conservation efforts resulted in reduced core gas usage of 112 million therms⁵, saving the direct costs of the conserved therms and contributing to downward pressure on gas prices. In a 2011 post-season WGSP study⁶, residential customers indicated that their primary motivation to reduce natural gas use was to save money or lower their bill and provided other insight into the motivation for customer conservation. Following the 2011 program cycle, PG&E used this information to evaluate the program and identified opportunities that can improve customer response.

The program has created the necessary environment to allow PG&E to analyze and develop two enhancements that could be implemented for the remaining years of the program, 2012 and 2013. The proposed enhancements are part of the same WGSP approved in resolution G-3405, and are therefore covered by Resolution G-3405 order number 7, which states that "The Energy Division is

¹ CPUC Resolution G-3405, Ordering Paragraph 7 granted the Energy Division authority to approve requests related to the winter gas savings program.

² Financial savings are calculated against a customer's personal three-year weather adjusted average.

³ G-CT customers only receive credit for the transportation portion of their PG&E bill.

⁴ See G-WGSP Applicability section for exclusions to WGSP eligibility.

⁵ Therms identified as not eligible for Energy Efficiency credit.

⁶ Hiner & Partners, Post-Campaign Survey, April 2011.

delegated the authority to approve similar requests by PG&E submitted by advice letter,"⁷ and can be approved by Energy Division.

Program Enhancement Description

The two program enhancements described below increase program precision and help ensure that customers obtain a more precise indication of what they have or have not achieved in terms of usage reduction on a temperature-adjusted and location-adjusted basis.

PG&E proposes the following program adjustments and revisions to gas rate Schedule G-WGSP and its associated tariffs as shown in Attachment 1, accordingly:

1. Weather Adjustment Factor (WAF) Enhancement

PG&E conducted analysis on the weather adjustment factor (WAF) it uses to adjust customer bills for their earned credits, and identified areas where the precision could be increased. The WAF is applied in order to normalize the usage data and minimize the impact of volatile swings in weather when comparing the current program period gas usage to a three-year weather adjusted baseline average. The WAF is calculated using a 20-year historical average of temperatures during the program period and is applied to the three-year baseline average on a calendar month basis. The two proposed WAF adjustments will improve the precision by creating nine new WAF location adjustments for each of the new 21 billing serial WAFs.

a. Climate Zone

PG&E currently uses one WAF across its service territory to adjust a customer's conservation efforts. While this WAF is weighted to take into account customer population in the various parts of the service territory, it may not precisely reflect the weather variations for a particular customer's location. In a service territory as large and diverse as PG&E's, not all areas will experience the same variations in weather in any given year.

PG&E proposes to create nine distinct WAFs, one for each of PG&E's nine baseline territories, or climate zones throughout the service territory. PG&E proposes to apply the nine climate zone WAFs to customer usage data according to customer location and serial billing cycle. In this way, PG&E will be able to more precisely measure, communicate and reward customer conservation efforts, and customers will receive more accurate incentive indications for their conservation behavior.

⁷ Resolution G-3405, p. 12.

b. Serial Billing

Currently, PG&E calculates one calendar-month based WAF during the program period January 1 through the end of February. Because most meters are read once a month, PG&E encourages its customers to begin their conservation efforts in December and continue through March in order to fully capture reductions in January and February usage that will determine a customer's credit.⁸

PG&E has 21 serial billing cycles, only three of which closely match a calendar month period. When WGSP's WAFs are applied on a calendar month basis, as they currently are, customers whose usage falls outside of the calendar month must have their usage prorated. If the weather outside of the two program month periods happens to differ significantly from the weather during the two month program period, this can create an unfair situation. This was the case in 2011. For example, February 2011 was the coldest February in more than 20 years, while December and March were relatively warmer compared to 20-year historical averages. As a result, customers with mid-month meter read dates had a far higher calculated success rate for earning a credit compared to customers billed closer to the beginning or end of a month. The opposite situation can occur when extreme weather takes place in the shoulder months.

PG&E proposes to create 21 new WAFs, one for each serial billing cycle. This proposed program enhancement is intended to recalibrate the WAF such that a distinct and reflective adjustment is made for all 21 billing serials no matter how much the weather varies from normal patterns on a weekly or monthly basis. The result will be greater precision in measurement of usage changes and the appropriate message to customers concerning the success or not of their conservation efforts. For example, weather patterns in 2011 deviated significantly from 20-year averages, and PG&E estimates that program bill credits could have been \$23.5 million, or 34 percent lower had these proposed enhancements been in place.

PG&E believes that implementation of the climate zone enhancement for each serial billing WAF is critical if customers are to receive consistent and accurate incentive indications of their conservation efforts. The combination of the climate zone and serial billing WAF enhancement will result in each customer assigned a single adjustment based on individual location and billing serial, resulting in a more precise calculation of savings.

2. Adjust Program Start Date to December 1

PG&E recognizes that while the current WGSP season begins on January 1 and lasts through the end of February, gas conservation efforts ought to actually begin

⁸ For bills that contain days outside of the WGSP period (December-January), an Average Daily Usage for each billing period will be calculated and then prorated for the number of days in the WGSP period.

in accordance with the peak of the winter cold temperature period. Since cold winter temperatures begin in December and December is the coldest month of the year followed by January in PG&E's service territory, the WGSP period falls short of fully incenting customers to begin conservation. PG&E proposes to change the WGSP start and end dates such that the season begins on December 1 and ends on January 31. Since seventy-nine percent of customers indicate that their number one motivation for reducing natural gas usage is to save money and lower their bill⁹, incenting customers to begin saving when winter temperatures actually begin to drop helps customers achieve that goal.

PG&E will maintain the WGSP season for a two month period and provide customers advance notice through mass media and communication channels that the 2012 (and 2013) WGSP will begin on December 1 instead of January 1.

Program Enhancements Cost Recovery

The proposed activities in this advice letter support IT development requirements. PG&E plans to absorb the incremental costs of the two program enhancements through the currently approved annual \$4.3 million revenue requirement authorized in Advice Letter 3130-G-A. These costs will be recovered consistent with the current WGSP cost recovery mechanism as approved by the Commission in AL 3130-G-A.

Expedited Treatment Requested

PG&E respectfully requests expedited treatment of this filing in order to allow for implementation of the proposed tariff-revisions and program enhancements. PG&E must begin WGSP campaign messaging no later than October 15, 2011 to prepare customers for the new December 1st season start date. PG&E must first attain approval from the Commission so that communication messaging can be adjusted well in advance of the October date. Expedited treatment is also required for completely implementing the necessary IT developments well in advance of the October deadline. As such, PG&E requests that the Commission approve this filing on or before **August 1, 2011**.

Tariff Revisions

Please see Attachment 1 for the proposed revisions to Gas Rate Schedule G-WGSP.

⁹ Hiner & Partners, Post-Campaign Survey, April 2011.

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 **July 21, 2011**, which is 20 days from 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 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:

Brian K. Cherry
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
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 2 advice filing, upon Energy Division approval, become effective **August 1, 2011**.

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 PG&E's 2009 BCAP (A.09-05-026) and PG&E's GT&S Rate Case (A.09-09-013). Address changes to the General Order 96-B service list and all electronic approvals 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. Advice letter filings can also be accessed electronically at <http://www.pge.com/tariffs/>.

A handwritten signature in black ink that reads "Brian Cherry/gcd". The signature is written in a cursive, flowing style.

Vice President – Regulation and Rates

cc: Service Lists: A.09-05-026, A.09-09-013

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: Conor Doyle

Phone #: (415) 973-7817

E-mail: jcdt@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) #: **3222-G**

Tier: 2

Subject of AL: **Request for Expedited Approval to Implement Program Enhancements to PG&E's Winter Gas Savings Program for Residential and Commercial Gas Customers**

Keywords (choose from CPUC listing):

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

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

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

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

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

Resolution Required? Yes No

Requested effective date: **August 1, 2011**

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).

Tariff schedules affected: **G-WGSP**

Service affected and changes proposed:

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

jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Brian Cherry, Vice President, Regulation and Rates

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

**ATTACHMENT 1
Advice 3222-G**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
29104-G	GAS SCHEDULE G-WGSP WINTER GAS SAVINGS PROGRAM Sheet 1	28353-G
29105-G	GAS SCHEDULE G-WGSP WINTER GAS SAVINGS PROGRAM Sheet 2	28354-G
29106-G	GAS SCHEDULE G-WGSP WINTER GAS SAVINGS PROGRAM Sheet 3	28355-G
29107-G	GAS TABLE OF CONTENTS Sheet 1	29100-G
29108-G	GAS TABLE OF CONTENTS Sheet 3	29102-G



GAS SCHEDULE G-WGSP
WINTER GAS SAVINGS PROGRAM

Sheet 1

APPLICABILITY: Schedule G-WGSP rewards gas customers who reduce their natural gas usage from their Base Usage (defined below) during the Winter Gas Savings Program (WGSP) period from December 1, 2011 through January 31, 2012 and December 1, 2012 through January 31, 2013 and continuing thereafter for the months of December and January unless modified further (Program Periods). This schedule is applicable to residential and commercial customers served on one of the following PG&E rate schedules: G-1, G1-NGV, GL1-NGV, GM, GS, GT, GL-1, GML, GSL, GTL, G-NR1, and G-NR2. (D)/(N)
 I
 (D)/(N)
 (N)
 (N)

The following are excluded from participating in this schedule: (1) customers where continuous service (for either the current or any previous customer) did not exist at the service address for one or more of the previous WGSP periods in the previous three (3) years; (2) customers who initiated service at their current service address on or after the October 1 that precedes the current Program period; and (3) customers currently taking service under a qualifying rate schedule in conjunction with noncore transportation rate Schedule G-EG and/or Schedule G-NT on the same service agreement. (D)/(N)

Schedule G-WGSP establishes a limited credit for natural gas conservation to assist customers in managing their winter gas bills. Regardless of the customer's billing cycle, the start and end dates of this program are December 1 and January 31, respectively, for all eligible customers. (D)/(N)

TERRITORY: This schedule applies everywhere PG&E provides natural gas service.

CREDIT RATES: The credit is available to eligible customers achieving a reduction in natural gas usage during each, Program Period compared to the customer's Base Usage for that period. (D)/(N)

Base Usage (BU equals the customer's average usage for the Program Period during the prior three winters, if available, adjusted for weather differences. Customers who reduce usage by at least ten percent (10%) during the program period will receive a twenty percent (20%) credit on their natural gas charges. Customers who reduce usage from one to nine percent (1% - 9%) during the program period will receive a corresponding 1% to 9% credit on their PG&E natural gas charges in the billing period. (D)/(N)
 (D)
 (D)

The customer's regular monthly bill will continue to be calculated according to their otherwise applicable schedule during the program period. (N)
 (N)

Credit Calculations for customers taking service under schedule G-CT (Core Transport) will only be provided a credit for the transportation portion of their PG&E bill. (N)
 (N)

(Continued)

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 Vice President
 Regulation and Rates

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GAS SCHEDULE G-WGSP
WINTER GAS SAVINGS PROGRAM

Sheet 2

**SPECIAL
 CONDITIONS:**

1. If the customer was not at the current service address or does not have usage for the prior three (3) WGSP periods, PG&E may include prior customer(s)'s usage at the service address, when available, as a proxy for the customer's usage in the calculation of the current Winter Program Period's BU. (T)
2. Customer must meet the applicability criteria of the program and also receive continuous service during the program period.
3. If successful in reducing natural gas usage, customers will receive a credit on their PG&E natural gas charges for the Program Periods excluding utility user's taxes, franchise fee surcharges under Schedule G-SUR, the City Franchise Surcharge and ClimateSmart Charges, which are prorated, as necessary, to put the charges on an equivalent calendar year basis. The credit will be calculated on applicable PG&E customer, procurement, and transportation charges, and applicable charges billed under Schedule G-PPPS. (D)/(N)
4. For customers billed using SmartMeter™ interval data prior to the start of the WGSP, the actual exact daily usage during the Program Period will be used. All customers not billed using SmartMeter™ interval data and with billing periods that do not align exactly with the Program Periods respective start and end dates of the program will have their usage prorated during those months. (N)
(D)/(N)
I
(D)/(N)
(N)
5. The customer's reduction in natural gas usage will be rounded to the nearest whole number percentage point for the purpose of determining eligibility for the credit.
6. A weather adjustment of the BU amount will be made for colder or warmer than normal weather that might occur during the program period in order to fairly compare past BU and present program period usage. Heating Degree Days (HDD) is a measure of how far below a standard reference temperature (60 degrees Fahrenheit) the actual temperatures during the program period have been. The weather-adjustment factor (WAF) applied to each customer's BU will be based on the billing serial of the customer and the customer's climate zone. The HDDs used to calculate the WAF's for the program period will be based on all available recorded weather data and a forecast of the remaining weather to allow for the credit to be issued during the next billing period bill on or after January 31 of the eligible program year. (D)/(N)
(N)
(N)
(D)/(N)
(N)
I
(N)
(D)/(N)

(Continued)

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GAS SCHEDULE G-WGSP
WINTER GAS SAVINGS PROGRAM

Sheet 3

SPECIAL
 CONDITIONS:
 (Cont'd.)

7. PG&E is not required to develop an adjusted BU amount for customers that might have experienced increased consumption due to occupancy increases or changes in consumption patterns, or for customers who have implemented efficiency and conservation measures in the previous year to allow these customers to qualify for the bill credit.
8. A minimum reduction of 1% is required to receive a credit. Similarly, customers exceeding 10% reductions will only be rewarded with a 20% credit.
9. For customers with multiple accounts, summary billings, or multiple meters at a premise, the credit will be calculated and applied, if applicable, to each of the customer's individual service agreements.
10. For master-metered customers that sub-meter, the credit shall be determined by usage measured by the master-meter. Master-metered customers, including mobile home park owners with sub-metered tenants, receiving a credit shall distribute the credit to sub-metered tenants consistent with Public Utilities Code section 739.5(b).
11. Any disputes arising from the provision of service under this Schedule or other aspects of the Winter Gas Savings Program will be deemed disputes over amounts billed for natural gas and will be handled as provided for in PG&E's Rule 10, Disputed Bills.
12. PG&E normally reads meters each month with minor exceptions. If, because of unusual conditions or for reasons beyond PG&E's control, the customer's meter cannot be read on the scheduled reading date, or if for any reason accurate meter data is not available, PG&E will make estimates according to its applicable tariff rules. In these instances, the estimated meter reads will form the basis of the comparisons in determining whether customers qualify for the bill credit.
13. For customers who were on Schedule G-NT but are now on an eligible WGSP rate schedule, G-NT billed usages from the past 3 years at their service location may be used to establish their BU for WGSP.

(N)
 I
 (N)

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Sheet 3

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

AT&T	Department of Water Resources	North Coast SolarResources
Alcantar & Kahl LLP	Dept of General 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	Economic Sciences Corporation	RCS, Inc.
Barkovich & Yap, Inc.	Ellison Schneider & Harris LLP	Recurrent Energy
Bartle Wells Associates	Foster Farms	SCD Energy Solutions
Bloomberg	G. A. Krause & Assoc.	SCE
Bloomberg New Energy Finance	GLJ Publications	SMUD
Boston Properties	GenOn Energy, Inc.	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	Sun Light & Power
Calpine	MAC Lighting Consulting	Sunshine Design
Casner, Steve	MBMC, Inc.	Sutherland, Asbill & Brennan
Chris, King	MRW & Associates	Tabors Caramanis & Associates
City of Palo Alto	Manatt Phelps Phillips	Tecogen, Inc.
City of Palo Alto Utilities	McKenzie & Associates	Tiger Natural Gas, Inc.
City of San Jose	Merced Irrigation District	TransCanada
Clean Energy Fuels	Modesto Irrigation District	Turlock Irrigation District
Coast Economic Consulting	Morgan Stanley	United Cogen
Commercial Energy	Morrison & Foerster	Utility Cost Management
Consumer Federation of California	NLine Energy, Inc.	Utility Specialists
Crossborder Energy	NRG West	Verizon
Davis Wright Tremaine LLP	Navigant Consulting	Wellhead Electric Company
Day Carter Murphy	Norris & Wong Associates	Western Manufactured Housing Communities Association (WMA)
		eMeter Corporation
Defense Energy Support Center	North America Power Partners	