



A  Sempra Energy utility®

Rasha Prince
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011
Tel: 213.244.5141
Fax: 213.244.4957
RPrince@semprautilities.com

December 16, 2013

Advice 4579

(Southern California Gas Company U 904 G)

Advice 2557-E/2252-G

(San Diego Gas & Electric Company U 902 M)

Advice 3440-G/4330-E

(Pacific Gas and Electric Company U 39 M)

Advice 2988-E

(Southern California Edison Company U 338 E)

Public Utilities Commission of the State of California

Subject: Submission of Energy Efficiency (EE) Program Final Report of the “Data Working Group” in Compliance with Ordering Paragraph (OP) 13c of Decision (D.) 13-09-044

Southern California Gas Company (SoCalGas), on behalf of itself, San Diego Gas and Electric Company (SDG&E), Southern California Edison Company (SCE) and Pacific Gas and Electric Company (PG&E) (together the “Investor Owned Utilities”, or “IOUs”) hereby submit this Tier 1 Advice Letter (AL) containing the Final Report of the Data Working Group (DWG) as directed in D.13-09-044, the Decision Implementing 2013-2014 Energy Efficiency Financing Pilot Programs.

Purpose

D.13-09-044 directed the IOUs to convene the Energy Efficiency (EE) Finance Programs DWG to finalize its March 2012 draft report which identifies data collection requirements for all post-2012 EE finance programs, and associated activities and documents (e.g., customer consent forms).

This filing complies with Ordering Paragraph (OP) 13c of D.13-09-044, which requires SoCalGas to file the Final Report of the DWG in a Tier 1 AL by December 15, 2013¹ and serve

¹ December 15, 2013, falls on a Sunday. Rule 1.15 of the Commission’s Rules of Practice and Procedure and Rule 1.5 of the Commission’s General Order 96-B provide that if the last day does not fall on a business day, the time limit is extended to the first business day thereafter. Therefore, this AL is timely submitted.

it to the service list for the consolidated proceedings for Approval of 2013-2014 Energy Efficiency Programs and Budget. The report is included herein as Attachment B.

Background

In D.12-05-015, the Decision Providing Guidance on 2013 – 2014 Energy Efficiency Portfolios and 2012 Marketing, Education and Outreach, the Commission ordered the IOUs to design a new set of financing programs to be offered as pilot programs on a consistent and statewide basis. To perform this activity, the IOUs were ordered to hire an expert financing consultant to design the new financing programs for 2013 – 2014.²

The decision also directed the IOUs to collect data on the performance of loans receiving credit enhancements (CEs) and On-Bill Financing (OBF) through current programs and build a database of California loan payment history from all sources of energy project loans.³ Furthermore, the decision required utilities to develop a database that will eventually, once confidentiality protocols are worked out, be able to provide anonymous customer data publicly.

In D.12-11-015, the Decision Approving 2013 – 2014 Energy Efficiency Programs and Budgets, the Commission indicated that in order to allow time for sufficient review and consideration, the financing pilots were deferred to a separate proceeding with authority delegated to the assigned Commissioner to finalize the design and launch of the pilots.⁴ The Commission expressed in that decision in connection with finance budget authorizations, that all entities operating programs in 2013 and 2014 participate in efforts to collect data to populate a database of financing-related information.⁵

D.13-09-044 was issued at the conclusion of the assigned Commissioner's review process, and approved seven pilot programs to be deployed in phases, according to the proposed Implementation Plan,⁶ which takes into account the potential timing for deployment of each pilot.

The decision also ordered the IOUs to finalize and submit the report by December 15, 2013 according to the following process / considerations:

- The Commission finds it reasonable for the IOUs to promptly initiate a workshop, in consultation with Energy Division staff, FIs, HBC, and CAEATFA, open to the public, to prompt finalization of the Draft Report (D.13-09-044, §7.2, p. 77).
- The DWG Final Report shall address, inter alia, relevant data elements for each pilot, sources, location, anonymization, management, and access (D.13-09-044, Ordering Paragraph 13).
- The IOUs and Energy Division shall generally conform to the Commission's guidelines for the steps necessary to finalize the data protocols for EE Finance and initiate the EE Finance database as set forth in Appendix D (D.13-09-044, Ordering Paragraph 13a).
- To the extent that the Commission adopts privacy protocols or anonymization standards in Rulemaking 08-12-009 applicable to the EE Finance Database, the EE Finance DWG

² D.12-05-015, Ordering Paragraphs 21 and 22, p. 400. SoCalGas and the IOUs retained the consulting firm of Harcourt, Brown and Carey (HBC) to aid with the development of the finance pilots.

³ D.12-05-015, p. 125.

⁴ D.12-11-015, Ordering Paragraph 22, p. 135.

⁵ D.12-11-015, Ordering Paragraph 55, and p. 67.

⁶ D.13-09-044, Appendix G.

Final Report shall be consistent with those protocols and standards (D.13-09-044, Ordering Paragraph 13b).

D.13-09-044 also explained that the EE Finance database should be housed and managed by the California Hub for Energy Efficiency Financing (CHEEF), and requires individual consent by a pilot participant to release their energy usage and loan information.

Finalization of the DWG Report

In compliance with D.13-09-044, a public workshop was conducted by HBC on November 13, 2013, covering the draft report and other significant considerations regarding the collection of data to support deployment and ongoing implementation of the pilots. Meaningful input was provided by FIs and other stakeholders in attendance (both in person and by webinar) at the event.

D.13-09-044, Appendix D, also provided a schedule and guidelines for steps necessary to finalize data protocols of the DWG report. The DWG has met the schedule and generally followed these steps with the following notes:

- Aggregated data: the methods for appropriately anonymizing data for public access are pending in the CPUC's Energy Data Center proceeding and not yet available.
- Consent forms: Customers will utilize existing IOU Customer Information Standardized Request forms, or similar releases, to release project-specific EE data to the CHEEF. Financial Institutions will use their own forms or procedures to release financing-related data to the CHEEF. Finalization of forms is deferred until this matter can be addressed with the CHEEF's Master Servicer.⁷

With the completion of these milestones, the IOUs thus submit in Attachment B the final DWG report to the Commission for its consideration.

Role of CAEATFA as Finance Pilot Programs CHEEF

Concurrent with the post-decision development of the pilots for deployment, CAEATFA is undertaking activities to establish itself as the CHEEF to run the finance pilots. The CHEEF role is to structure the CEs; develop broad terms and conditions for financial products offered through the pilot programs; coordinate and track the deal flow between qualified FIs, IOUs, and customers; protect the integrity of ratepayer funds held as CEs; provide transparency; and ensure program compliance by the FIs and the IOUs.

CAEATFA will serve as the manager of the Master Servicer (MS), who will receive customer loan information for transmission to the IOUs and will receive loan payments from the IOUs for remission to the FIs. The MS will collect pilot data and store it for use by the Data Manager, who will aggregate and prepare data.

⁷ Note Appendix D instructs the IOUs to identify matters that must be deferred for the Data Manager and/or Master Servicer in 2014.

Implementation of the DWG Report and Next Steps

The decision notes to stay on track for On-Bill Repayment (OBR) pilots roll-out, CAEATFA will need to select and obtain final approval of the Data Manager contract by February 2014. In compliance with D.13-09-044, SoCalGas will coordinate with CAEATFA and the selected Data Manager to implement the Final Report of the DWG and to integrate the finance program data provided by the IOUs for integration into the EE Finance Database.

In a parallel effort, the IOUs are continuing to consult with the Commission's Energy Division and FIs in order to provide required customer payment history data according to the provisions of D.13-09-044, Ordering Paragraph 12.b. A portion of this data has been submitted to the Commission. The remaining data will be provided by January 31, 2014 consistent with information privacy protocols that may be adopted in R.08-12-009.

Protests

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date of this Advice Letter, which is January 5, 2014. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attn: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). **A copy of the protest should also be sent via both e-mail and facsimile** to the address shown below on the same date it is mailed or delivered to the Commission.

For SCG:

Attn: Sid Newsom
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No. (213) 244-4957
E-mail: snewsom@SempraUtilities.com

For SDG&E:

Attn: Megan Caulson
Regulatory Tariff Manager
8330 Century Park Court, Room 32C
San Diego, CA 92123-1548
Facsimile No. (858) 654-1879
E-mail: MCaulson@semprautilities.com

For SCE:

Megan Scott-Kakures
Vice President, Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Leslie E. Starck
Senior Vice President, Regulatory Policy & Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

For PG&E:

Brian K. Cherry
Vice President, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-7226
E-mail: PGETariffs@pge.com

Effective Date

The IOUs believe that this filing is subject to Energy Division disposition and, pursuant to D.13-09-044, is classified as Tier 1 (effective pending disposition). The IOUs respectfully request that this Advice Letter be approved December 16, 2013, the date filed.

Notice

A copy of this advice letter is being sent to all parties listed on Attachment A, which includes the interested parties in A.12-07-003, et al.

Rasha Prince
Director, Regulatory Accounts

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. **SOUTHERN CALIFORNIA GAS COMPANY (U 904G)**

Utility type:

- ELC GAS
 PLC HEAT WATER

Contact Person: Sid Newsom

Phone #: (213) 244-2846

E-mail: SNewsom@semprautilities.com

EXPLANATION OF UTILITY TYPE

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 4579, et al.

Subject of AL: EE Program Final Report of the Data Working Group in Compliance with OP 13c of D.13-09-044

Keywords (choose from CPUC listing): Balancing Account

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

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.13-09-044

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

Does AL request confidential treatment? If so, provide explanation: No

Resolution Required? Yes No Tier Designation: 1 2 3

Requested effective date: 12/16/13 No. of tariff sheets: 0

Estimated system annual revenue effect (%): _____

Estimated system average rate effect (%): _____

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: None

Service affected and changes proposed¹ See Advice Letter

Pending advice letters that revise the same tariff sheets: None

Protests 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
 Attention: Tariff Unit
 505 Van Ness Ave.,
 San Francisco, CA 94102
EDTariffUnit@cpuc.ca.gov

Southern California Gas Company
 Attention: Sid Newsom
 555 West 5th Street, GT14D6
 Los Angeles, CA 90013-1011
SNewsom@semprautilities.com
tariffs@socalgas.com

¹ Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 4579, et al.

(See Attached Service Lists)

Alcantar & Kahl Kari Harteloo klc@a-klaw.com	Alcantar & Kahl Seema Srinivasan sls@a-klaw.com	Alcantar & Kahl LLP Annie Stange sas@a-klaw.com
Alcantar & Kahl, LLP Mike Cade wmc@a-klaw.com	Azusa Light & Water George Morrow gmorrow@ci.azusa.ca.us	Barkovich & Yap Catherine E. Yap cathy@barkovichandyap.com
Beta Consulting John Burkholder burkee@cts.com	CPUC Consumer Affairs Branch 505 Van Ness Ave., #2003 San Francisco, CA 94102	CPUC Energy Rate Design & Econ. 505 Van Ness Ave., Rm. 4002 San Francisco, CA 94102
CPUC Pearlie Sabino pzs@cpuc.ca.gov	CPUC - DRA R. Mark Pocta rmp@cpuc.ca.gov	California Energy Commission Robert Kennedy rkennedy@energy.state.ca.us
California Energy Market Lulu Weinzimer luluw@newsdata.com	Calpine Corp Avis Clark aclark@calpine.com	City of Banning Paul Toor P. O. Box 998 Banning, CA 92220
City of Burbank Lincoln Bleveans lbleveans@burbankca.gov	City of Colton Thomas K. Clarke 650 N. La Cadena Drive Colton, CA 92324	City of Long Beach Gas & Oil Dennis Burke Dennis.Burke@LongBeach.gov
City of Los Angeles City Attorney 200 North Main Street, 800 Los Angeles, CA 90012	City of Pasadena - Water and Power Dept. G Bawa GBawa@cityofpasadena.net	City of Riverside Joanne Snowden jsnowden@riversideca.gov
City of Vernon Dan Bergmann dan@igservice.com	Commerce Energy Catherine Sullivan csullivan@commerceenergy.com	Commerce Energy Blake Lazusso blasuzzo@commerceenergy.com
Crossborder Energy Tom Beach tomb@crossborderenergy.com	DGS Henry Nanjo Henry.Nanjo@dgs.ca.gov	Davis, Wright, Tremaine Judy Pau judypau@dwt.com
Douglass & Liddell Donald C. Liddell liddell@energyattorney.com	Douglass & Liddell Dan Douglass douglass@energyattorney.com	Downey, Brand, Seymour & Rohwer Dan Carroll dcarroll@downeybrand.com
Dynergy Mark Mickelson Mark.Mickelson@dynergy.com	Energy Division Tariff Unit EDTariffUnit@cpuc.ca.gov	Gas Transmission Northwest Corporation Bevin Hong Bevin_Hong@transcanada.com

General Services Administration Facilities Management (9PM-FT) 450 Golden Gate Ave. San Francisco, CA 94102-3611	Genon Energy, Inc. Greg Bockholt Greg.Bockholt@Genon.com	Goodin, MacBride, Squeri, Ritchie & Day, LLP James D. Squeri jsqueri@gmsr.com
Hanna & Morton Norman A. Pedersen, Esq. npedersen@hanmor.com	Iberdrola Renewables Energy Services Julie Morris Julie.Morris@iberdrolaren.com	Imperial Irrigation District K. S. Noller P. O. Box 937 Imperial, CA 92251
JBS Energy Jeff Nahigian jeff@jbsenergy.com	Kern River Gas Transmission Company Janie Nielsen Janie.Nielsen@KernRiverGas.com	LADWP Robert Pettinato Robert.Pettinato@ladwp.com
LADWP Nevenka Ubavich nevenka.ubavich@ladwp.com	MRW & Associates Robert Weisenmiller mrw@mrwassoc.com	Manatt Phelps Phillips Randy Keen rkeen@manatt.com
Manatt, Phelps & Phillips, LLP David Huard dhuard@manatt.com	March Joint Powers Authority Cindy Lockwood lockwood@marchjpa.com	McKenna Long & Aldridge, LLP John Leslie jleslie@Mckennialong.com
National Utility Service, Inc. Jim Boyle One Maynard Drive, P. O. Box 712 Park Ridge, NJ 07656-0712	Navigant Consulting, Inc. Ray Welch ray.welch@navigantconsulting.com	Nexant, Inc. Carl Huppert chuppert@nexant.com
PG&E Tariffs Pacific Gas and Electric PGETariffs@pge.com	Praxair Inc Rick Noger rick_noger@praxair.com	RCS, Inc Don Schoenbeck dws@r-c-s-inc.com
Safeway, Inc Cathy Ikeuchi cathy.ikeuchi@safeway.com	Sierra Pacific Company Christopher A. Hilan chilen@sppc.com	Southern California Edison Co. John Quinlan john.quinlan@sce.com
Southern California Edison Co. Karyn Gansecki karyn.gansecki@sce.com	Southern California Edison Co. Kevin Cini Kevin.Cini@SCE.com	Southern California Edison Co. Colin E. Cushnie Colin.Cushnie@SCE.com
Southern California Edison Company Michael Alexander Michael.Alexander@sce.com	Southwest Gas Corp. John Hester John.Hester@swgas.com	TURN Marcel Hawiger marcel@turn.org
The Mehle Law Firm PLLC Colette B. Mehle cmehle@mehlelaw.com	Western Manufactured Housing Communities Assoc. Sheila Day sheila@wma.org	

BUILDING PERFORMANCE INSTITUTE, INC. SHANDRA (TIGER) ADOLF tadolf@bpi.org	ELLA BAKER CENTER FOR HUMAN RIGHTS NWAMAKA AGBO nwamaka@ellabakercenter.org	BRIGHTLINE DEFENSE PROJECT EDDIE H. AHN eddie@brightlinedefense.org
CAL. BLDG. PERFORMANCE CONTRACTORS ASSN CONRAD ASPER Conrad@TheCBPCA.org	NATIONAL ASIAN AMERICAN COALITION FAITH BAUTISTA Faith.MabuhayAlliance@gmail.com	FIVE STAR BANK JAMES BECKWITH 6810 FIVE STAR BLVD., STE 100 ROCKLIN, CA 95677
CPUC - ENERGY DIVISION DANIEL BUCH Daniel.Buch@cpuc.ca.gov	CITY OF BERKELEY TIMOTHY BURROUGHS tburroughs@cityofberkeley.info	CALIF PUBLIC UTILITIES COMMISSION Simon Baker seb@cpuc.ca.gov
CALIF PUBLIC UTILITIES COMMISSION Jeremy Battis jbe@cpuc.ca.gov	BLACK ECONOMIC COUNCIL LEN CANTY lencanty@blackeconomiccouncil.org	COUNTY OF LOS ANGELES HOWARD CHOY hchoy@isd.co.la.ca.us
CPUC MICHAEL COLVIN michael.colvin@cpuc.ca.gov	CALIFORNIA CENTER FOR SUSTAINABLE ENERGY SACHU CONSTANTINE sachu.constantine@energycenter.org	CALIF PUBLIC UTILITIES COMMISSION Moises Chavez mcv@cpuc.ca.gov
CALIF PUBLIC UTILITIES COMMISSION Jeanne Clinton cln@cpuc.ca.gov	GREEN FOR ALL KATHERINE DANIEL kat@greenforall.org	CALIF PUBLIC UTILITIES COMMISSION Melanie Darling md2@cpuc.ca.gov
CALIF PUBLIC UTILITIES COMMISSION Tim G. Drew zap@cpuc.ca.gov	NATURAL RESOURCES DEFENSE COUNCIL LARA ETTENSON lettenson@nrdc.org	CITY OF OAKLAND GARRETT FITZGERALD gfitzgerald@oaklandnet.com
ATKINSON, ANDELSON, LOYA, RUUD & ROMO ROBERT FRIED rfried@aalrr.com	CALIF PUBLIC UTILITIES COMMISSION Julie A. Fitch jf2@cpuc.ca.gov	CALIF PUBLIC UTILITIES COMMISSION Cathleen A. Fogel cf1@cpuc.ca.gov
CALIF PUBLIC UTILITIES COMMISSION Hazlyn Fortune hcf@cpuc.ca.gov	CALIF PUBLIC UTILITIES COMMISSION Tory Francisco tnf@cpuc.ca.gov	PACIFIC GAS & ELECTRIC COMPANY MARY GANDESBERY mary.gandesbery@pge.com
CAL. ENERGY EFFICIENCY INDUSTRY COUNCIL MARGIE GARDNER policy@efficiencycouncil.org	WOMEN'S ENERGY MATTERS BARBARA GEORGE wem@igc.org	SOUTHERN CALIFORNIA EDISON COMPANY MONICA GHATTAS monica.ghattas@sce.com
NAT'L. ASSN. OF ENERGY SVC COMPANIES DONALD GILLIGAN dgilligan@naesco.org	CAEATFA SAUL ACOSTA GOMEZ Saul.Gomez@Treasurer.ca.gov	THE UTILITY REFORM NETWORK HAYLEY GOODSON hayley@turn.org

<p>CALIF PUBLIC UTILITIES COMMISSION Monisha Gangopadhyay mgb@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Alice Glasner ag6@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Paula Gruending pg1@cpuc.ca.gov</p>
<p>CALIFORNIA ENERGY COMMISSION JANE HEINZ, J.D. Jane.Heinz@energy.ca.gov</p>	<p>PULSE ENERGY BRUCE HERZER bruce.herzer@PulseEnergy.com</p>	<p>SAN DIEGO UNIFIED PORT DISTRICT CODY HOOVEN chooven@portofsandiego.org</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Katherine Hardy keh@cpuc.ca.gov</p>	<p>KEYES FOX & WEIDMAN LLP JASON B. KEYES jkeyes@kfwlaw.com</p>	<p>CALIFORNIA HOUSING PARTNERSHIP CORP. MEGAN KIRKEBY MKirkeby@chpc.net</p>
<p>ADAMS BROADWELL JOSEPH & CARDOZO ELIZABETH KLEBANER eklebaner@adamsbroadwell.com</p>	<p>FIRSTFUEL SOFTWARE, INC. SAMUEL P. KRASNOW skrasnow@firstfuel.com</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Bruce Kaneshiro bsk@cpuc.ca.gov</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Jonathan P. Knapp jp8@cpuc.ca.gov</p>	<p>ABAG POWER JERRY LAHR JerryL@abag.ca.gov</p>	<p>DOUGLASS & LIDDELL DONALD C. LIDDELL liddell@energyattorney.com</p>
<p>JODY LONDON CONSULTING JODY S. LONDON jody_london_consulting@earthlink.net</p>	<p>GLOBAL GREEN USA MARY LUEVANO mluevano@globalgreen.org</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Peter Lai ppl@cpuc.ca.gov</p>
<p>CALIF PUBLIC UTILITIES COMMISSION Jean A. Lamming jl2@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Xian Cindy Li xl2@cpuc.ca.gov</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Aaron Lu al8@cpuc.ca.gov</p>
<p>CALIFORNIA PUBLIC UTILITIES COMMISSION JACLYN MARKS jaclyn.marks@cpuc.ca.gov</p>	<p>BUILD IT GREEN BRUCE MAST bruce@builditgreen.org</p>	<p>HEATING AIR-CONDITIONING & REFRIGERATION JONATHAN MELCHI jmelchi@hardinet.org</p>
<p>CALIF. CLIMATE AND AGRICULTURE NETWORK JEANNE MERRILL jeannemerrill@gmail.com</p>	<p>CITY OF CHULA VISTA - CITY ATTY'S. OFF. BART C. MIESFELD bmiesfeld@chulavistaca.gov</p>	<p>SARA STECK MYERS ssmyers@att.net</p>
<p>OPOWER MATTHEW O'KEEFE california@opower.com</p>	<p>WILSON SONSINI GOODRICH & ROSATI PC SHERIDAN J. PAUKER, ESQ. SPauker@wsgr.com</p>	<p>CPUC - DRA DAVID B. PECK dbp@cpuc.ca.gov</p>
<p>CONSUMER ELECTRONICS ASSOCIATION MICHAEL PETRICONE MPetricone@ce.org</p>	<p>CALIF PUBLIC UTILITIES COMMISSION Lisa Paulo lp1@cpuc.ca.gov</p>	<p>ENVIRONMENTAL HEALTH COALITION KAYLA RACE Kaylar@environmentalhealth.org</p>

CRHMFA HOMEBUYERS FUND
 ANTHONY RAHILL
 ARahill@rcrcnet.org

SIERRA BUSINESS COUNCIL
 JENNIFER ROSSER
 JRosser@SBcouncil.org

COMMISSION OF MENDOCINO
 COUNTY
 CRAIG SCHLATTER
 SchlattC@cdchousing.org

SYNERGY COMPANIES
 STEVEN R. SHALLENBERGER
 steve@synergycompanies.org

CITY AND COUNTY OF SAN
 FRANCISCO
 JEANNE M. SOLE
 jeanne.sole@sfgov.org

MANATT PHELPS & PHILLIPS, LLP
 JACK STODDARD
 JStoddard@manatt.com

CALIF PUBLIC UTILITIES COMMISSION
 Brian Stevens
 brc@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Nils Strindberg
 ns2@cpuc.ca.gov

CAEATFA
 SARAH TAHERI
 Sarah.Taheri@Treasurer.ca.gov

THE GREENLINING INSTITUTE
 VIEN TROUNG
 vient@greenlining.org

CALIF PUBLIC UTILITIES COMMISSION
 George S. Tagnipes
 jst@cpuc.ca.gov

MARIN ENERGY AUTHORITY
 JEREMY WAEN
 JWaen@MarinEnergy.com

CALIF PUBLIC UTILITIES COMMISSION
 Karen Camille Watts-Zagha
 kwz@cpuc.ca.gov

CALIF PUBLIC UTILITIES COMMISSION
 Katie Wu
 kw1@cpuc.ca.gov

SAN DIEGO GAS &
 ELECTRIC/SOCALGAS
 JOY C. YAMAGATA
 JYamagata@SempraUtilities.com

LAT. BUS. CHAMBER OF GREATER
 L.A.
 info@lbcgla.com

ATTACHMENT B

Advice No. 4579, et al.

Final Data Working Group Report

California Energy Efficiency Finance

Data Working Group

Final Report

December 16, 2013

Acknowledgements

We thank the following individuals and their organizations for their participation and assistance to the final Data Working Group Report:

- ffi Frank Spasaro, Southern California Gas Company (SCG)
- ffi Albertina Chu, Southern California Gas Company (SCG)
- ffi Jeff Barnes, San Diego Gas & Electric Company (SDG&E), *Team Chairperson*
- ffi Gregg Lawless, San Diego Gas & Electric Company (SDG&E)
- ffi Al Gaspari, Pacific Gas and Electric Company (PG&E)
- ffi John Ku, Pacific Gas and Electric Company (PG&E)
- ffi Alyssa Cherry, Southern California Electric Company (SCE)
- ffi Elia Deanda, Southern California Edison Company (SCE)
- ffi Monica Ghattas, Southern California Edison Company (SCE)
- ffi Eric Lee, Southern California Edison Company (SCE)
- ffi Priscilla Ortiz, Southern California Edison Company (SCE)
- ffi Deana Carrillo, California Alternative Energy and Advanced Transportation Financing Authority (CAEATFA)
- ffi Robert Hedrick, State Treasurer's Office (STO)
- ffi Matthew Brown, Harcourt Brown & Carey (HBC)
- ffi Mark Zimring, Tule Partners
- ffi David Nemptow, Nemptow & Associates
- ffi Aaron Berg, Blue Tree Strategies
- ffi David Carey, Harcourt Brown & Carey (HBC), *Lead Consultant*

For further information contact: Jeff Barnes, SDG&E, at JBarnes@semprautilities.com.

Additional information about ***California EE Finance activities*** is at: www.caleefinance.com.

Data Working Group – *Final Report*

Table of Contents

Section 1. Executive Summary	2
Section 2. Background.....	3
Section 3. The Purpose	3
Section 4. Data Manager	6
Section 5. Data Users and Uses	7
Section 5a. Financial Institutions	7
Section 5b. Government Users	7
Section 5c. Program Managers	8
Section 5d. Product & Service Providers	9
Section 5e. Property Asset Manager and/or Energy Customer	10
Section 6. Data Sources and Collection.....	10
Section 7. Proposed Data Access and Use By CHEEF	11
Section 8. Data “Anonymization”	11
Section 9. Collaboration - Integrating Data from California Program and National Data Initiatives	11
Appendix	12

Data Working Group – *Final Report*

Section 1. Executive Summary

The Data Working Group, convened by Southern California Gas Company at the request of the California Public Utilities Commission (CPUC), produced the following report (Report) to address issues and opportunities related to data collection and dissemination for the data required for the energy efficiency (EE) financing pilot programs authorized under CPUC Decision (D.) 13-09-044.¹

The Report describes potential users of data and their likely uses, as well as questions potential users may seek to answer about the impact of financing on the uptake of energy efficiency. Based on the identified users and uses, individual data elements were selected to capture information about the customers, properties, projects and financing as well as energy and payment performance for both residential and non-residential properties, subject to appropriate protections for customer privacy and commercially sensitive data.

In addition, the Report describes the role of the California Hub for Energy Efficiency Financing (CHEEF) and methodologies for collecting and managing data that may be made available to the CHEEF and Financial Institutions (FIs), consistent with customer privacy and data confidentiality requirements. The report addresses customer privacy issues through the use of express, prior written authorizations by each customer for collection and access to customer specific data, and the need to determine appropriate anonymization techniques to allow sharing and analysis of anonymized data subject to additional confidentiality protections for proprietary or commercially sensitive data.

The Report also describes the opportunity to collaborate with national and California-based data initiatives and proposes that, due to the “in-development” status of these initiatives, additional collaboration take place, including coordination of selected EE finance data elements to match existing datasets, to the extent possible.

A draft version of this Report² served as the basis for the Data Public Workshop held on November 13, 2013, which gave participants an opportunity to provide comments and propose enhancements. The input received from the Workshop is reflected in this final Report.

¹ Decision 13-09-044, “Decision Implementing 2013-2014 Energy Efficiency Financing Pilot Programs”, September 19, 2013, available at www.caleefinance.com/cpuc-formally-issues-and-posts-final-decision/.

² Draft available at <http://www.caleefinance.com/draft-data-working-group-report-available/>.

Section 2. Background

The CPUC directed Southern California Gas Company to use its “expert financing” consultant, Harcourt Brown & Carey, to convene a data Working Group (WG) to address issues with data collection and dissemination related to the Statewide EE finance programs (including the Pilots approved in D.13-09-044, On-Bill Financing, American Recovery and Reinvestment Act continuation programs, and Regional Energy Network programs). The WG was established in late 2012 and tasked accordingly. This Report describes the recommendations of the WG for the development of an energy finance database consisting of data generated by the pilots approved in D.13-09-044 and other similar utility-sponsored, CPUC-approved energy efficiency finance programs.

Section 3. The Purpose

As noted in D. 13-09-044, the CPUC cited the following three examples of the importance of data to the EE financing initiative:

1. “Data collection, subject to relevant privacy considerations, is essential to be able to test the value of various features of the authorized financing pilots. The data should be collected in a careful and comprehensive manner to ensure the relevant data are collected at the least cost.”³
2. Appropriate individual consent will be obtained from pilot program participants “for release of their own energy usage information and loan information as part of the EE Finance data collection and sharing protocols.”⁴
3. The Investor-Owned Utilities (IOUs), in collaboration with the WG, are looking to “develop a larger-scale database or databases of financing related data and information that could be shared publicly and that consists of the following minimum types of information: customer type, host site characteristics, utility payment history, borrower credit scores and energy project repayment history, energy project performance data, and billing impacts pre- and post-installation utility bills.”⁵

³D 13-09-044, page 73

⁴D. 13-09-044, page 73

⁵D. 13-09-044, page 74

The table below lists the individual finance Pilot programs being implemented under CPUC approval for 2013-2015 that are subject to the data requirements noted in this Report:

Pilot Name	Funding Source	Financial Product
Energy Finance Line Item Charge (EFLIC)	Stage 1: American Reinvestment and Recovery Act (ARRA) funded reserve; Stage 2: Private capital	Single family Loans
Master-Metered Multifamily Finance Program	Stage 1: Community Development Financial Institution (CDFI) capital, ARRA funded reserve; Stage 2: CDFI capital, Ratepayer funded reserve	Multifamily Loans
Non-On-Bill Repayment (OBR) Small Business Lease	Private capital, ratepayer funded reserve	Leases
OBR Non-Residential (typically Medium/Large) Business without Credit Enhancement (CE)	Private capital	Loans and Service Agreements
OBR Small Business Lease	Private capital, ratepayer funded reserve	Leases
OBR Small Business with Credit Enhancement	Private capital, ratepayer funded reserve	Loans
Single Family Loan Program	Private capital and ratepayer funded reserve	Single family loans

The following energy finance programs are currently operating in California, some of which rely on taxpayer or ratepayer⁶ support. All programs, including those not supported with taxpayer or ratepayer funding, will be encouraged to submit data to the Data Manager.

Program Name	Funding Source	Financial Product
California Alternative Energy and Advanced Transportation Financing Authority (CAEATFA)	Assembly Bill x1 14	Single family loans
California Pollution Control Financing Authority (CPCFA)	California Treasury, funded by Federal grant money	Small business loans
CRHMFA Homebuyers Fund (CHF)	IOU, ARRA Continuation Funding	Single family loans
emPower SBC (Santa Barbara County)	ARRA, Ratepayer funds	Residential loans
Energy Conservation Assistance Act (ECAA)	California State taxpayer	Public facilities loans
Los Angeles County Property Assessed Clean Energy (PACE)(operating under Southern California Regional Energy Network and City of Los Angeles)	Private Investors	Tax Assessments
Marin Energy Authority (MEA)	Private capital and ratepayer funds	Single family, multifamily and small business loans
On-Bill Financing (OBF)	Ratepayer funds	Non-residential loans

⁶The WG recommends that data from other existing finance programs (e.g., On-Bill Finance, American Reinvestment and Recovery Act continuation programs, Regional Energy Networks, etc.) be considered for inclusion in the database after transitional issues are resolved with obtaining complete datasets for contracts prior to the issuance of this report and the start of formal data collection. In addition, customer data privacy and proprietary data issues need to be resolved for this additional data because necessary data releases have not been obtained from customers and other entities participating in these other finance programs. If the transitional and customer data privacy issues cannot be resolved, then the data from existing finance programs will be provided by the IOUs in an alternative format.

Program Name	Funding Source	Financial Product
PACE Programs (various)	Governments or investors	Tax Assessments
Regional Energy Network (REN) Loan Programs	ARRA funds	Single family loans
Sacramento Municipal Utility District (SMUD) Loan Program	Ratepayer funds	Single family loans
Southern California Regional Energy Network (SoCalREN) Lease Financing	Private Investors	Leases

Section 4. Data Manager

The Data Manager will be a subcontractor to the CHEEF, which may be a subcontractor of the respective utilities and participating FIs, for purposes of collecting different types of data and sharing that data, with the utilities and FIs. The CHEEF/Master Servicer/Data Manager will be responsible for performing the following functions:

- ffi Providing the required data elements and format to program participants
- ffi Collecting and storing data pursuant to IOU and FI data security requirements as required
- ffi Providing a quality control process to ensure that the data collected is complete and accurate
- ffi Ensuring that there is a process in place to evaluate data collection requirements versus market needs and participant cost hurdles
- ffi Providing appropriate levels of access to users
- ffi Providing tools to analyze the data
- ffi Establishing a secure web portal that will facilitate data collection efforts
- ffi Compliance with IOU and Financial Institutions, third-party security requirements and regulations
- ffi Providing online access and monthly reporting to CAEATFA, the Master Servicer and IOUs
- ffi Other functions necessary to a useful database

Section 5. Data Users and Uses

There are five primary user types (Financial Institutions, Government, Program Managers, Product and Service Providers, and Property Asset Managers and/or Energy Customers) that have been identified, each with its own respective use(s) for data generated by these pilot programs that will be collected in this database and coordinated efforts.

Section 5a. Financial Institutions

The types of organizations that would invest in financial products originated under the pilot programs include:

- ffi Capital Investors (including Institutional Investors)
- ffi Financial instrument originators and Servicers
- ffi Depositories (Banks and Credit Unions)
- ffi Foundation Program-related investment (PRI) managers and other “mission” related investors
- ffi Rating Agencies (Standard & Poor’s, Moody’s, Fitch)
- ffi Data Providers (Bloomberg)
- ffi IOUs (when providing capital or credit enhancement funding)
- ffi Lease and financing companies

Financial Institution Data Uses

The following are typical questions that would be asked by the Financial Institutions’ class of users to better understand the relationship between the performance of financial instruments and energy savings. Investors want data that can help them understand and manage credit and energy performance risks. Providing data for the analysis of how these two categories interact with OBR might allow investors to take additional credit risk if it were offset by better energy performance.

- ffi Does energy efficiency financing perform differently than other investments and what is the cause?
- ffi Is there a correlation between property type and performance?
- ffi Is there a correlation between loan performance and certain installed measures or combinations of measures?
- ffi Do certain contractors achieve better energy savings performance than their peers?
- ffi Do greater savings correlate to better loan performance?
- ffi Do certain energy efficiency measures generate more predictable levels of savings?
- ffi Is the level of expected energy savings used by the Investor to establish the eligible loan amount?

Section 5b. Government Users

This group of organizations covers decision-makers that authorize the use of sponsorship funding from ratepayers and/or taxpayers. This group also includes the array of program

evaluators and regulatory agencies that serve them, along with stakeholder advocates that provide input in the policy making process. Governmental Policy Makers access data from energy efficiency financing programs in accordance with their respective regulatory programs and in compliance with customer privacy and proprietary data protection requirements, such as the Public Utilities Code, Public Resources Code and California Information Practices Act.

Government users include:

- ffi California Public Utilities Commission
- ffi Legislatures
- ffi Federal & State Agencies
- ffi Environmental and Social Equity Advocates
- ffi Division of Ratepayer Advocates (consumer protection)
- ffi Evaluation, Measurement and Verification (contractors)

Government Data Uses:

The following are typical questions asked by government officials to better understand the cost, benefit and effectiveness of incentives to various parties.

- ffi Do EE financing pilots increase consumer adoption of targeted EE improvements?
- ffi What is the profile of applicants who are either rejected from the loans or decide not to move forward with the loan process?
- ffi What program features (e.g., expanded customer access to capital, lower interest rates, loan term lengths, resolution of split incentives or long paybacks) are critical factors in driving increased EE adoption?
- ffi What is the incremental cost per unit of energy efficiency gained?
- ffi What program features have the most value to, or impact on, investors?
- ffi What financial product concessions do pilots acquire through credit enhancement provision or OBR access?
- ffi Are new Investors entering the market for energy efficiency financing or are new financial products being provided because of the pilots?
- ffi If new investors are entering the market, is this evidence of market transformation and if so can credit enhancements be withdrawn without reducing participation?
- ffi Is financing repayment performance of the OBR portfolio correlated with energy performance or predictability of energy performance?

Section 5c. Program Managers

Managers that operate energy efficiency programs and/or fund budgets and key program design features in order to maximize program effectiveness for the benefit of their customers or clients. These entities include:

- ffi Local, state and federal governments
- ffi RENs

- ffi IOUs and Public Utilities
- ffi Evaluation, Measurement and Verification contractors

Program Manager Data Uses:

The following are typical questions asked by program managers to help them understand the operational aspects of financing energy efficiency.

- ffi What are the life cycle costs of OBR loans and programs?
- ffi How can we reduce the administrative costs for OBR?
- ffi How can we drive more customer demand?
- ffi How do OBR and credit enhancement mechanisms interact with existing programs?
- ffi How can we help contractors drive more demand?
- ffi How do we work with contractors to drive more customer demand?
- ffi Who is the target customer that finds Service Provider and Investor value propositions strong and compelling?
- ffi Can financial incentives (e.g., rebates or incentives) and other program offerings (e.g. technical assistance) be withdrawn or reduced and replaced with financing while customer adoption of EE is driven to policy-relevant levels?
- ffi What “leverage” does financing achieve and what savings should it appropriately be given credit for relative to other program offerings?
- ffi Does financing promote more comprehensive retrofits than projects that don’t use financing?

Section 5d. Product & Service Providers

Service providers and the corresponding supply chain associated with selling and installing EE packages and include:

- ffi Energy Efficiency Program Facilitators
- ffi Engineering Firms
- ffi Contractors (General Contractors, Home Performance and Trades)
- ffi Energy Service Companies (ESCOs)
- ffi Manufacturers and Distributors
- ffi Third Party Demand Side Management Providers

Product & Service Providers Data Uses:

The following are typical questions asked by product and service providers to better understand the market size and commercial opportunity for energy efficiency financing services.

- ffi Do contractors feel comfortable explaining different financing products to their customers? If not, what would help?
- ffi What aspects of the financing product make it easier to close deals (i.e. Instant approval, low FICO, etc.)?
- ffi How can I find more customers for my product or service?

- ffi How can I make it as convenient as possible for them to buy my product or service?
- ffi How can I help them understand the opportunities for their building/asset?
- ffi What financing options are a good fit for my product or service?
- ffi What do I need to do in order to help my customer qualify for financing and utility rebates and/or incentives?

Section 5e. Property Asset Manager and/or Energy Customer

The following organization types are primary beneficiaries of energy efficiency financing projects include:

- ffi Building Owners
- ffi Building Managers
- ffi Building Occupants
- ffi Real estate portfolio managers
- ffi Property Performance Rating Systems & Appraisers

Property Asset Manager and/or Energy Customer Data Uses:

Data uses here cover:

- ffi Why should I pursue energy efficiency and what are the benefits?
- ffi What are the time, effort and costs resources associated with pursuing energy efficiency?
- ffi What return on investment can I expect?
- ffi What if the project does not achieve the expected savings?
- ffi What should I expect for financing term, interest rate, off balance sheet, etc.?

Section 6. Data Sources and Collection

A major element of this initiative is to identify sources of the data and establish a method for collecting the data. The WG proposes a method for transferring energy efficiency financing data for purposes of program implementation, evaluation and policymaking. The IOUs would provide individual billing cycle/history and energy consumption data to the Master Servicer and continue to provide consumption data throughout the term of the financing. The FIs would provide the individual borrower, property, project and financial instrument data to the Master Servicer. The FIs would continue to provide servicing data throughout the term of the financing.

The FIs would be able to utilize billing history and energy consumption data to underwrite the loan.

If the project qualifies for a utility rebate and/or incentive, project-related data, such as data regarding the property, the proposed EE project, estimated project savings, installation data and other data about the project collected and compiled by the utility in processing the project

may be provided to the database, consistent with customer confidentiality and the confidentiality of any utility proprietary data.

All datasets and transfers will be subject to appropriate customer notification and authorization and other confidentiality agreements and security procedures implemented by each entity collecting and providing access to the data. Data will be transferred in a format acceptable to the IOUs, FIs and the Master Servicer. The transferred data will be subject to security protections and other appropriate protocols and agreements to protect privacy and commercially sensitive information.

Section 7. Proposed Data Access and Use By CHEEF

In CPUC-approved EE finance programs, as appropriate to the particular design of the programs, utility customer-specific data will be collected and used subject to prior, express written authorization of the customer, allowing the release of the customer's financial, installation, energy consumption, and billing history data to the CHEEF and the Master Servicer, solely for purposes related to the particular EE finance programs. Anonymized and/or aggregated data may be released to the public, subject to reasonable security procedures and protection against unauthorized collection, use or disclosure of customer-specific or proprietary data.

Section 8. Data "Anonymization"

Customers will utilize existing IOU Customer Information Standardized Request (CISR) forms, or similar releases, to release project-specific EE data to the CHEEF. FIs will use their own forms or procedures to release financing-related data to the CHEEF. Because the methods for appropriately anonymizing and/or aggregating data for public access have not yet been determined and are pending in the CPUC's Energy Data Center proceeding, the methodology to be used for protecting the privacy and confidentiality of customer data will be subject to the outcome of the proceeding and other applicable laws and requirements.

Section 9. Collaboration - Integrating Data from California Program and National Data Initiatives

There are numerous energy data initiatives including U.S. Department of Energy (DOE), U.S. Environmental Protection Agency (EPA), Energy Star Portfolio Manager, U.S. Department of Housing and Urban Development (HUD), Fannie Mae, the Environmental Defense Fund (EDF), Home Performance, ARRA programs, California Energy Commission (CEC), the IOU OBF programs and the CPUC that are seeking to make building and project energy data available to

serve various use cases. However, not all of these initiatives have completed their schema (data dictionary and transfer protocols), platform designs (database and automated program interfaces), data security protocols and the dates at which they intend to become fully operational are uncertain. The WG proposes that the California EE Finance initiative continue to collaborate with these energy data Initiatives and seek to coordinate the established data elements and definitions developed by California and these data initiatives, so that the datasets will be compatible among all of these programs.

Appendix

Proposed Residential and Non-Residential Data Elements

The following list of data elements was developed by the WG based on input from the Fannie Mae Energy Loan Program, Renewable Funding, participants in the Data Workshop (November 13, 2013), and various FIs and other stakeholders.

Residential and Non-Residential: Borrower, Financial Instrument, Property, Project and Financial Instrument Performance Data Provided by the FIs			
Date of this report:			
Source of this report:			
Field Name	Res (R), Non-Res (NR) or Both	Input Instructions	Required (R) vs Optional (O)
Borrower			
Type	Both	Res, non-res	R
Sub-type	Both	Single family code, commercial code	R
Phone number	Both		R
Phone type	Both		R
Contact e-mail	Both		R
Financial Instrument			
Financial instrument account number	Both	FI account number(s)	O
Financial instrument type	Both	Loan, lease, ESA, etc.	R
Field Name	Res (R), Non-Res	Input Instructions	Required (R) vs

	(NR) or Both		Optional (O)
Debt or service agreement	Both	Debt (principle and interest) vs service (operating lease, etc.)	R
Total amount funded	Both		R
Payments per year	Both	Monthly, Bi-Monthly, etc.	R
Periodic payment amount	Both		R
Total years (term)	Both		R
Borrower FICO	R		R
Co-Borrower FICO	R		R
Debt service coverage	NR		O
If debt...			R
Interest rate	Both		R
Annual Percentage Rate (APR)	Both		R
Household income	R		R
Household debt	R		R
Debt to income ratio	R		R
Project Property			
Building type	Both	List to be provided	R
Program type	Both	New, Replace On Burn-out (ROB), Early Replacement (RET)	R
Address	Both		R
City	Both		R
State	Both		R
Zip	Both		R
Utility meter(s) associated w/ property	Both		R
Utility account number(s) associated w/ property	Both		R

Field Name	Res (R), Non-Res (NR) or Both	Input Instructions	Required (R) vs Optional (O)
Financial Instrument Performance			
Current	Both		R
Prepaid amount	Both		R
Pre-paid in full	Both		R
30-59 day DQ	Both		R
Times in 30 day DQ	Both		R
60 - 89 day DQ	Both		R
Times in 60 day DQ	Both		R
90 - 120 day DQ	Both		R
Times in 90 day DQ	Both		R
Reason for DQ	Both		O
Loan modification	Both		O
In default	Both		R
Reason for default	Both		O
Charged-off	Both		R
Charged-off amount	Both		R
Charge-off recovery amount	Both		R
BK	Both		O
Reason for BK	Both		O
Utility service provided by	Both		R
Utility account number	Both		R
Project			
Reason for project	Both	Energy savings, comfort, failed equipment, etc.	R
Rebate/incentive program(s) used	Both		R
1. Rebate/incentive amount(s)	Both		R
2. Financed amount	Both		R

Field Name	Res (R), Non-Res (NR) or Both	Input Instructions	Required (R) vs Optional (O)
3. Out-of-pocket amount	Both		R
Total project amount (1+2+3)	Both		R
Number of units installed	Both		R
Installation date	Both		R
Installed technology #1	Both	e.g., HVAC	R
Level a	Both	e.g., air conditioning	R
Level b	Both	e.g., SEER	R
Installed technology #2	Both	e.g., HVAC	R
Level a	Both	e.g., air conditioning	R
Level b	Both	e.g., SEER	R
Whole Home Energy Efficiency Project	R	Yes/No	R
Estimated savings	Both	% or Not available	O
Methodology to estimate savings	Both	Energy Pro, Etc.	O
Estimated cost of saved kWh	Both	Total installed cost divided by units saved	O
Estimated cost of saved Therm	Both	Total installed cost divided by units saved	O
Contractor name	Both		R
Contractor certifications	Both	e.g., professional engineer, etc.	O*
Contractor license number	Both		R*
Approximate age of property	Both		R
Approximate square footage of property	Both		R

* This data is optional if provided by Utilities

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

1st Light Energy
AT&T
Alcantar & Kahl LLP
Anderson & Poole
BART
Barkovich & Yap, Inc.
Bartle Wells Associates

Braun Blasing McLaughlin, P.C.
California Cotton Ginners & Growers Assn
California Energy Commission
California Public Utilities Commission
California State Association of Counties
Calpine
Casner, Steve
Cenergy Power
Center for Biological Diversity
City of Palo Alto
City of San Jose
Clean Power
Coast Economic Consulting
Commercial Energy
County of Tehama - Department of Public Works
Crossborder Energy
Davis Wright Tremaine LLP
Day Carter Murphy
Defense Energy Support Center

Dept of General Services
Division of Ratepayer Advocates

Douglass & Liddell
Downey & Brand
Ellison Schneider & Harris LLP
G. A. Krause & Assoc.
GenOn Energy Inc.
GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz & Ritchie
Green Power Institute
Hanna & Morton
In House Energy
International Power Technology
Intestate Gas Services, Inc.
K&L Gates LLP
Kelly Group
Linde
Los Angeles Dept of Water & Power
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McKenna Long & Aldridge LLP
McKenzie & Associates
Modesto Irrigation District

Morgan Stanley
NLine Energy, Inc.
NRG Solar
Nexant, Inc.

North America Power Partners
Occidental Energy Marketing, Inc.

OnGrid Solar
Pacific Gas and Electric Company
Praxair
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
SCE
SDG&E and SoCalGas

SPURR
San Francisco Public Utilities Commission
Seattle City Light
Sempra Utilities
SoCalGas
Southern California Edison Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
Tiger Natural Gas, Inc.
TransCanada
Utility Cost Management
Utility Power Solutions
Utility Specialists

Verizon
Water and Energy Consulting
Wellhead Electric Company
Western Manufactured Housing Communities Association (WMA)