



**Pacific Gas and
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November 3, 2005

Advice 2675-G
(Pacific Gas and Electric Company ID U39G)

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**Subject: Request for Expedited Implementation of PG&E's Natural Gas
2005-2006 Winter Gas Savings Program for Residential and
Small Commercial Gas Customers: Winter Revenue Deferral
Program and New Gas Schedule G- 10/20 - Winter Gas Savings
Program**

Public Utilities Commission of the State of California

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

Purpose

As a result of the recent hurricanes in the Gulf of Mexico and the spike in natural gas costs that is expected to continue through the 2005-2006 winter heating season, winter monthly gas bills are expected to be 50 to 60 percent higher this winter than last winter. In response, PG&E proposes, with the support of TURN, to implement two additional winter gas savings programs designed to encourage conservation and smooth out high winter gas bills. Under this proposal, residential and small commercial gas customers under gas rate Schedules G-1, GM, GS, GT, GL-1, GML, GSL, GTL, and G-NR1 will be eligible to participate in both programs.

The first program proposed in this filing, the "Winter Revenue Deferral Program," will help smooth out the impacts of the coldest winter-month bills (December-February) by deferring recovery of an estimated \$248.6 million in gas revenues from the winter to summer season. The second program, the "10/20 Winter Gas Savings Program", is designed to encourage conservation by providing a 20-percent rebate to customers who achieve a minimum of 10 percent reduction in their cumulative gas usage during the January-March 2006 billing period. PG&E anticipates providing successful participants in the 10/20 winter gas savings program with rebates totaling approximately \$200 million starting in April 2006.¹

¹This advice filing is subject to the condition precedent that PG&E obtain \$350 million in short term financing under the financing authorization provided in Decision 04-10-037 in order to finance the revenue deferral associated with the programs proposed in this filing. In the event such financing is not available, PG&E reserves the right to withdraw this filing.

The rates proposed to implement the Winter Gas Savings Program are shown in Table 1 to this filing.

Background

The Winter Revenue Deferral and 10/20 Winter Gas Savings programs proposed in this advice letter target residential and small commercial customers to provide relief from the expected high winter bills, and provide a direct monetary incentive for customers to reduce their usage, which also will have the added effect of reducing these customers' bills.

This filing is part of the overall strategy to help customers control winter bills. In particular, it is designed to provide significant, tangible relief to a much larger number of customers than most of the other, existing programs can currently provide.

Since August 2005, the Commission has acted expeditiously to approve requests by PG&E to do all of the following to benefit gas customers this winter:

- Expand PG&E's natural gas purchasing strategy the utility is using to protect retail gas customers from price spikes this winter and beyond (PG&E also volunteered to forego any shareholder award under the Core Procurement Incentive Mechanism Year 2004 – 2005);
- Expand the California Alternative Rates for Energy (CARE) and Low-Income Energy Efficiency Programs to provide low income residential customers with greater bill protection this winter;
- Expand customer payment options, and extend existing financial assistance programs to customers; and
- Infuse new funds into PG&E's energy-efficient gas rebate program, which had been depleted earlier this year due to the popularity of the program.

PG&E continues to help customers reduce their energy use through conservation and energy efficiency programs, including on-line energy audits, and programs to help low income households in particular.

Earlier this year, in D.05-06-029, the Commission approved a plan that decreased the rate residential customers pay for gas used above their baseline allowance, which results in somewhat lower winter bills when gas use is at its highest.

In late August and early September 2005, PG&E rolled out an intensified customer outreach plan and educational effort to make customers aware of the likelihood of higher energy bills this winter and provide tools and options for managing winter

gas bills. This effort has been very successful in increasing awareness of the coming high prices. This filing will help provide a much broader range of customers with more tools to take action, to manage their costs this winter.

Winter Revenue Deferral Program

PG&E estimates that the Winter Revenue Deferral Program will defer recovery of \$248.6 million of winter season gas revenues to the summer season. To implement the program, PG&E will reduce the "Core Fixed Cost Account – Distribution Cost Subaccount" transportation rate component shown in gas Preliminary Statement Part B—*Default Tariff Rate Components*, by \$0.20 per therm effective December 7, 2005. The rate reduction will remain in place for three months and be removed from the transportation rate component in conjunction with the March 2006 monthly core procurement rate change effective March 7, 2006.

The winter revenue deferral program will apply to all residential and small commercial customers that purchase gas transportation service from PG&E for all or a portion of the time period between December 7, 2005, and March 6, 2006, under gas rate Schedules G-1, GM, GS, GT, GL-1, GML, GSL, GTL, and G-NR1.²

Schedule G-10/20—Winter Gas Savings Program

PG&E proposes to implement a 10/20 Winter Gas Savings Program during the three month period of January 1 through March 31, 2006. The 10/20 program is modeled after PG&E's electric 20/20 summer savings program. The 10/20 program will reward gas customers who reduce their cumulative natural gas usage during the three-month period by a minimum of 10 percent compared to the same period in 2005, with a one-time rebate equal to 20 percent of the customer's PG&E gas bill for the three month period.³ The 20 percent rebate will be credited to qualifying customers' bills during the next billing period after March 31, 2006.

The average residential gas customer qualifying under the 10/20 program is expected to save about \$90 during the winter period due to conservation and receive a rebate of about \$60, for a total savings of approximately 30 percent on the expected average winter gas bill.

The program is open to all residential and small commercial customers that receive service from PG&E under gas rate Schedules G-1, GM, GS, GT, GL-1,

² For customers that take 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, the winter revenue deferral program will apply only to the portion of the usage billed under the eligible rate schedule.

³ The 10/20 rebate will be calculated on applicable PG&E natural gas charges, including charges billed under Schedule G-PPPS-*Gas Public Purpose Surcharge*. Charges billed under Schedule G-SUR – Customer-Procured Franchise Fee Surcharge and applicable utility user's taxes will be excluded from the rebate calculation.

GML, GSL, GTL, and G-NR1.⁴ To be eligible, the customer must have 12 months of continuous service commencing January 1, 2005, at the same service address.

In addition, PG&E requests CPUC authorization to recover \$5.4 million for marketing and implementing the 10/20 Winter Gas Savings Program, as discussed below.

Tariff Revisions - Gas Schedule G-10/20

New gas rate Schedule G-10/20 - *Winter Gas Savings Program*, is filed herein to implement the 10/20 Winter Gas Savings Program.

Recovery of Winter Gas Savings Program Costs

The Winter Revenue Deferral Program is forecasted to result in a \$248.6 million revenue deferral during the winter months, and the 10/20 Winter Gas Savings Program is forecasted to pay out \$200 million in rebates starting in April 2006. PG&E will also incur \$5.4 million in non-recurring program start-up costs for customer communications, marketing, and system programming to implement the billing framework for the 10/20 Winter Gas Savings Program. PG&E proposes that these costs, totaling \$454 million, be recovered in residential and small commercial customers' transportation rates during the summer gas season, beginning April 1, 2006, through an adjustment to the "Core Fixed Cost Account – Distribution Cost Subaccount" transportation rate component of \$0.39 per therm. PG&E requests authorization in this filing for recovery of: 1) the revenue deferral caused by the Winter Revenue Deferral Program; 2) the rebates provided by the 10/20 Winter Gas Savings Program; and 3) the non-recurring marketing and billing system implementation costs associated with these programs.

The transportation rate increase will be implemented in conjunction with the April 2006 monthly core procurement rate change advice letter and be removed in conjunction with the November monthly core procurement rate change advice letter. Any difference between the actual revenue deferral and the amounts recovered in rates in 2006 will be recorded in the distribution cost subaccount of the CFCA.⁵ The balance in the CFCA will be incorporated into transportation rates in the Annual Gas True-up effective January 1, 2007.

Expedited Treatment Requested

PG&E requests expedited treatment of this filing in order to implement the Winter Revenue Deferral Program in conjunction with the regular monthly core

⁴ Customers 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 do not qualify for the program.

⁵ If necessary, PG&E will file an advice letter in order to assure that core transport customers do not pay a disproportionate share of 10/20 rebates attributable to PG&E's procurement charges.

procurement rates that will be filed November 30, 2005, for rates effective December 7, 2005. In addition, in order to make customers aware of the 10/20 Winter Gas Savings Program, PG&E must provide information in December bill inserts. Therefore, PG&E requests that the protest period for this advice letter be shortened to **November 10, 2005**, and that the Commission approve this filing before or at its scheduled November 18, 2005, business meeting.

Shortened Protest Period – 7 Days

Anyone wishing to protest this filing may do so by sending a letter by **November 10, 2005**, which is **7 days** from the date of this filing. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. Protests should be mailed to:

Energy Division
Attention: Tariff Unit, 4th Floor
505 Van Ness Avenue
San Francisco, California 94102
Facsimile: (415) 703-2200
E-mail: jjr@cpuc.ca.gov and jnj@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:

Pacific Gas and Electric Company
Attention: Brian Cherry
Director, Regulatory Relations
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

PG&E requests that this advice filing be approved by **November 18, 2005**. The Winter Revenue Deferral Program will be implemented in conjunction with the December core procurement monthly price advice letter to be filed November 30, 2005, for rates effective December 7, 2005. PG&E requests that its proposed Schedule G-10/20 being filed in this advice letter also be approved effective November 18, 2005. PG&E will implement the 10/20 Winter Gas Savings Program beginning January 1, 2006.

Notice

In accordance with General Order 96-A, Section III, Paragraph G, a copy of this advice letter is being sent electronically or via U.S. mail to parties shown on the attached list, and to the service lists for R. 04-01-006, R. 04-01-025, and A. 04-07-044. Address changes should be directed to Rose De La Torre at (415) 973-4716. Advice letter filings can also be accessed electronically at:

<http://www.pge.com/tariffs>

Brian K. Cherry/sv

Director - Regulatory Relations

Attachments

cc: Service Lists –R. 04-01-006, R. 04-01-025, and A. 04-07-044,

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 U39

Utility type:

ELC GAS

PLC HEAT WATER

Contact Person: John Clarke/Bernard Lam

Phone #: (415) 973-3652/973-4878

E-mail: jpc2@pge.com/bxlc@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) #: **2675-G**

Subject of AL: Request for Expedited Implementation of PG&E's Natural Gas 2005-2006 Winter Gas Savings Program for Residential and Small Commercial Gas Customer: Winter Revenue Deferral Program and New Gas Schedule G-10/20—Winter Gas Savings Program

Keywords (choose from CPUC listing): CORE, BILLING, CREDIT

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: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

Resolution Required? Yes No At Commission's discretion

Requested effective date: **11-18-05**

No. of tariff sheets: **4**

Estimated system annual revenue effect: (%): N/A

Estimated system average rate effect (%): See attached Table 1

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). See attached Table 1

Tariff schedules affected: New gas Schedule G 10/20 – Winter Gas Savings Program

Service affected and changes proposed¹: Residential schedules and Schedule G-NR1

Pending advice letters that revise the same tariff sheets: _____

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

Utility Info (including e-mail)

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

jjr@cpuc.ca.gov and jnj@cpuc.ca.gov

¹ Discuss in AL if more space is needed.

**ATTACHMENT 1
Advice 2675-G**

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
23541-G	Schedule G-10/20 - Winter Gas Savings Program	New
23542-G	Schedule G-10/20 (Cont.)	New
23543-G	Table of Contents -- Rate Schedules (Cont'd.)	23509-G
23544-G	Table of Contents -- Rate Schedules	23510-G



SCHEDULE G-10/20 — WINTER GAS SAVINGS PROGRAM

APPLICABILITY: Schedule G-10/20 rewards gas customers who reduce their natural gas usage during the period from January 1, 2006 through March 31, 2006, by at least ten percent (10%) compared to the same period in 2005, with a twenty percent (20%) discount. This schedule is applicable to residential and small commercial customers served under one of the following PG&E rate schedules: G-1, GM, GS, GT, GL-1, GML, GSL, GTL, and G-NR1. (N)

The following are excluded from participating in this schedule: (1) customers with less than 12 months of continuous service (as of January 1, 2005) at the same service address; and (2) customers 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.

Schedule G-10/20 establishes a limited one-time rebate for natural gas conservation to assist customers in managing projected natural gas bill increases during the 2005-2006 winter. Regardless of the customer's billing cycle, the start and end dates of this program are January 1, 2006 and March 31, 2006, respectively for all eligible customers.

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

RATES: The rebate is available to eligible customers achieving a minimum ten percent (10%) reduction in average daily usage (ADU) of natural gas usage during the period January 1, 2006 through March 31, 2006 compared to the previous year's same corresponding period of January 1, 2005 through March 31, 2005.

The customer's bill will continue to be calculated according to their otherwise applicable schedule during the program operation period (January 1, 2006 to March 31, 2006).

If the customer achieves a ten percent (10%) or more average reduction in ADU, PG&E will issue a rebate during the next billing period bill after March 31, 2006 equal to twenty percent (20%) of the customer's PG&E natural gas charges between January 1, 2006 and March 31, 2006.

- SPECIAL CONDITIONS:
1. Customers will continue to receive service under their otherwise applicable schedule while participating in the Winter Gas Savings Program.
 2. Customer must meet the applicability criteria of the program and also receive continuous service during the three months the program operates, January 1, 2006 to March 31, 2006.
 3. If successful in reducing their ADU by 10% or more, customers will receive a 20% rebate on their PG&E natural gas charges between January 1, 2006 and March 31, 2006, excluding utility user's taxes and franchise fee surcharges under Schedule G-SUR. The rebate will be calculated on applicable PG&E customer, procurement, and transportation charges, and applicable charges billed under Schedule G-PPPS.
 4. Customers whose billing periods do not align exactly with the January 1 and March 31 respective start and end dates of the program will have their usage prorated during those months to determine the ADU. (N)

(Continued)



SCHEDULE G-10/20—WINTER GAS SAVINGS PROGRAM
(Continued)

4. SPECIAL
CONDITIONS
(Cont'd):

- 5. The customer's ADU reduction will be rounded to the nearest whole number percentage point for the purpose of determining eligibility for the rebate.
- 6. No corrections or normalization of the baseline usage amounts will be made for weather differences that might occur during the program operation period relative to weather during the previous winter season.
- 7. PG&E is not required to develop an adjusted baseline usage amount for customers that might have experienced increased consumption due to occupancy increases, or for customers who have implemented efficiency and conservation measures in the previous year to allow these customers to qualify for the bill rebate.
- 8. No provisions will be made for natural gas usage reductions that fall short of meeting the 10% qualification standard. A minimum reduction of 10% is required to receive the 20% rebate. Similarly, customers exceeding 10% reductions will only be rewarded with a 20% rebate.
- 9. For customers with multiple accounts, summary billings, or multiple meters at a premise, the 20% rebate will be calculated and applied, if applicable, to each of the customer's individual service agreements.
- 10. For master-meter customers that sub-meter, the 20% rebate shall be determined by usage measured by the master-meter. Master-metered customers, including mobile home park owners with sub-metered tenants, receiving a rebate shall distribute the rebate 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 rebate.

(N)

(N)



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G-CFS	Core Firm Storage.....	22901,22147,22148,22149-G
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RATE SCHEDULES

RESIDENTIAL

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NONRESIDENTIAL

G-NR1	Gas Service to Small Commercial Customers	23503-G
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Pacific Gas & Electric Company
Table 1
2005-2006 Winter Gas Savings Program
for Residential and Small Commercial Customers

Calculation of Winter Revenue Deferral Program Rate Credit and
Calculation of Summer Gas Season Cost Recovery Rate

<u>Line</u>		
	<u>Total Forecasted Winter Gas Savings Program Costs (000's) (1)</u>	
1	Winter Revenue Deferral Program (Dec - Feb)	\$ 248,589
2	Gas 10/20 Winter Savings Program (Jan - Mar)	200,000
3	Incremental Marketing & System Costs	<u>5,400</u>
4	Total (000s)	<u><u>\$ 453,989</u></u>
	 <u>Calculation of Winter Revenue Deferral Program Rate Credit</u>	
5	Forecasted Program Cost (000's)	\$ 248,589
6	Residential and Small Commercial Throughput Dec. 2005 - Feb. 2006 (D. 95-06-029) (Mtherms)	<u>1,242,944</u>
7	Winter Revenue Deferral Program Rate Credit (\$/therm)	<u><u>\$ 0.20000</u></u>
	 <u>Calculation of Summer Gas Season Cost Recovery Rate</u>	
8	Forecasted Winter Gas Savings Program Cost (000's)	\$ 453,989
9	Residential and Small Commercial Throughput April 2006 - Oct. 2006 (D. 95-06-029) (Mtherms)	<u>1,163,520</u>
10	Summer Gas Season Cost Recovery Rate (\$/therm)	<u><u>\$ 0.39019</u></u>

(1) The forecast Winter Gas Savings Program costs do not include the revenue shortfall effects of conservation. Consistent with PG&E's tariffs, any revenue shortfalls due to conservation will be tracked and recovered in the 2007 Annual True-up of Balancing Accounts.

**PG&E Gas and Electric Advice
Filing List
General Order 96-A, Section III(G)**

ABAG Power Pool
Accent Energy
Agllet Consumer Alliance
Agnews Developmental Center
Ahmed, Ali
Alcantar & Elsesser
Anderson Donovan & Poole P.C.
Applied Power Technologies
APS Energy Services Co Inc
Arter & Hadden LLP
Avista Corp
Barkovich & Yap, Inc.
BART
Bartle Wells Associates
Blue Ridge Gas
Bohannon Development Co
BP Energy Company
Braun & Associates
C & H Sugar Co.
CA Bldg Industry Association
CA Cotton Ginners & Growers Assoc.
CA League of Food Processors
CA Water Service Group
California Energy Commission
California Farm Bureau Federation
California Gas Acquisition Svcs
California ISO
Calpine
Calpine Corp
Calpine Gilroy Cogen
Cambridge Energy Research Assoc
Cameron McKenna
Cardinal Cogen
Cellnet Data Systems
Chevron Texaco
Chevron USA Production Co.
Childress, David A.
City of Glendale
City of Healdsburg
City of Palo Alto
City of Redding
CLECA Law Office
Commerce Energy
Constellation New Energy
Cooperative Community Energy
CPUC
Cross Border Inc
Crossborder Inc
CSC Energy Services
Davis, Wright Tremaine LLP
Davis, Wright, Tremaine, LLP
Defense Fuel Support Center
Department of the Army
Department of Water & Power City
DGS Natural Gas Services
DMM Customer Services
Douglass & Liddell
Downey, Brand, Seymour & Rohwer
Duke Energy
Duke Energy North America
Duncan, Virgil E.
Dutcher, John
Dynegy Inc.
Ellison Schneider
Energy Law Group LLP
Energy Management Services, LLC
Enron Energy Services
Exelon Energy Ohio, Inc
Exeter Associates
Foster Farms
Foster, Wheeler, Martinez
Franciscan Mobilehome
Future Resources Associates, Inc
G. A. Krause & Assoc
Gas Transmission Northwest Corporation
GLJ Energy Publications
Goodin, MacBride, Squeri, Schlotz &
Hanna & Morton
Heeg, Peggy A.
Hitachi Global Storage Technologies
Hogan Manufacturing, Inc
House, Lon
Imperial Irrigation District
Integrated Utility Consulting Group
International Power Technology
Interstate Gas Services, Inc.
J. R. Wood, Inc
JTM, Inc
Kaiser Cement Corp
Luce, Forward, Hamilton & Scripps
Manatt, Phelps & Phillips
Marcus, David
Masonite Corporation
Matthew V. Brady & Associates
Maynor, Donald H.
McKenzie & Assoc
McKenzie & Associates
Meek, Daniel W.
Mirant California, LLC
Modesto Irrigation Dist
Morrison & Foerster
Morse Richard Weisenmiller & Assoc.
Navigant Consulting
New United Motor Mfg, Inc
Norris & Wong Associates
North Coast Solar Resources
Northern California Power Agency
Office of Energy Assessments
Palo Alto Muni Utilities
PG&E National Energy Group
Pinnacle CNG Company
PITCO
Plurimi, Inc.
PPL EnergyPlus, LLC
Praxair, Inc.
Price, Roy
Product Development Dept
R. M. Hairston & Company
R. W. Beck & Associates
Recon Research
Regional Cogeneration Service
RMC Lonestar
Sacramento Municipal Utility District
SCD Energy Solutions
Seattle City Light
Sempra
Sempra Energy
Sequoia Union HS Dist
SESCO
Sierra Pacific Power Company
Silicon Valley Power
Smurfit Stone Container Corp
Southern California Edison
SPURR
St. Paul Assoc
Stanford University
Sutherland, Asbill & Brennan
Tabors Caramanis & Associates
Tansev and Associates
Tecogen, Inc
TFS Energy
Transcanada
Turlock Irrigation District
U S Borax, Inc
United Cogen Inc.
URM Groups
Utility Cost Management LLC
Utility Resource Network
Wellhead Electric Company
Western Hub Properties, LLC
White & Case
WMA