



**Pacific Gas and
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April 25, 2005

Advice 2626-G/2654-E
(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

Subject: Update the Methodology and Forecast of Long-Term Avoided Cost(s) for the Evaluation of California Energy Efficiency Programs

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits for filing this update to the Energy and Environmental Economics, Inc. (E3) methodology and forecast of long term avoided cost(s) for the evaluation of California energy efficiency programs in compliance with Ordering Paragraph 3 of Decision (D.) 05-04-024.

Background

On January 8, 2004, E3 submitted to the Commission's Energy Division a draft report entitled "A Forecast of Cost Effectiveness Avoided Costs and Externality Adders." The report was developed by E3 under the direction of the Energy Division in order to update the avoided cost calculations used in evaluating energy efficiency programs to more accurately reflect current conditions. Among other things, the E3 report contains a forecast for the years 2004-2023 of avoided costs for use in quantifying the benefits of energy savings and demand reduction programs.

On April 22, 2004, the Commission issued an Order Instituting a Rulemaking (OIR) 04-04-025 to Promote Consistency in Methodology and Input Assumptions in Commission Applications of Short-Run and Long-Run Avoided Costs,

Including Pricing for Qualifying Facilities (the Avoided Cost proceeding). In the OIR, the Commission directed parties to comment on the potential application of the E3 Methodology to energy efficiency as well as to other applications.

On January 4, 2005, Administrative Law Judge (ALJ) Halligan divided R.04-04-025 into three phases. Phase 1 would address potential adoption of the E3 methodology for use in evaluation of energy efficiency programs for the 2006 to 2008 program cycle.¹

On April 7, 2005, the Commission adopted the Phase 1 decision, D.05-04-024, authorizing the E3 methodology for use in generating avoided cost energy forecasts to be used in the evaluation of energy efficiency programs for the 2006 to 2008 program cycle. The Commission ordered the utilities to file compliance Advice Letters updating the E3 Report with new input values.

Updates to the Avoided Cost Model

The Commission ordered each of the utilities to update the E3 forecast using the following input values:

1. Updated electric forward prices through 2007.
2. Input value from the Revised 2004 Market Price Referent (MPR) Staff Report, Appendix C. Specifically:
 - a. Capital Inputs
 - b. Finance Inputs
 - c. Power Delivery Inputs
 - d. Tax Rate Inputs
3. Updated gas price forecast:
 - a. For forecast year 1 through 6, use a 60-day average of NYMEX gas futures data extended back from April 7, 2005, the effective date of D.05-04-024.
 - b. For forecast year 7 through 20, use the MPR fundamentals forecast

On April 18, 2005, Energy Division convened a Workshop on Implementation of the E3 Methodology. The specific updates to model input values were discussed and general consensus was obtained among the attendees on input values and methodology.² PG&E acknowledges the use of the holdover assumptions from the original E3 report including the use of 2 percent inflation for the capital cost of generation for the purposes of calculating the avoided costs for use with the 2006 to 2008 energy efficiency programs. PG&E notes that this issue was not addressed as part of the MPR proceeding and does not take into account the effect of future long term technology improvements. In addition, parties agreed that E3 would perform all needed updates to its model using the agreed upon

¹ Phase 2 would address updates to avoided cost pricing for Qualifying Facilities; Phase 3 would address permanent use of an avoided cost methodology.

² See Brief Summary of Avoided Cost Workshop on Implementation of E3 Methodology distributed by Wade McCartney and Tim Drew, CPUC Energy Division, April 19, 2005.

input values and methodology, documented in Attachment A.³

E3 has updated the avoided cost model accordingly and for the purpose of implementing the Methodology and Forecast of Long-Term Avoided Cost(s) for the limited purpose of evaluation of energy efficiency programs in the 2006 to 2008 program cycle. The updated model is provided as a data disc to the Commission, Attachment B, and is available to the public on the internet. The Web Address is: http://www.ethree.com/cpuc_avoidedcosts.html

This filing will not increase any rate or charge; cause the withdrawal of service, or conflict with any rate schedule or rule.

Protest

Anyone wishing to protest this filing should do so by sending a letter by, **May 15, 2005**, which is 20 days after 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:

IMC Branch Chief - Energy Division
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: jjr@cpuc.ca.gov and jnj@cpuc.ca.gov

Protests also should be sent by e-mail and facsimile to Mr. Jerry Royer, Energy Division, as shown above, and by U.S. mail to Mr. Royer at the above address.

The protest should be sent via both e-mail and facsimile to PG&E on the same date it is mailed or delivered to the Commission at the address shown below.

Pacific Gas and Electric Company
Attention: Brian K. 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

³ The Platt's and NYMEX data used as input assumptions are only for use in the Avoided Cost docket, R.04-04-025, and compliance in connection therewith, and may not be used for other purposes.

Effective Date

PG&E requests that this advice filing become effective on regular notice, **May 25, 2005**, which is 30 calendar days from the date of filing.

Notice

In accordance with General Order 96-A, Section III, Paragraph G, of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.04-04-025 and R.01-08-028. 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. Cheng /BK

Director - Regulatory Relations

Attachments

cc: Service Lists R.04-04-025 and R.01-08-028

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)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Bernard Lam

Phone #: (415) 973-4878

E-mail: bxic@pge.com

EXPLANATION OF UTILITY TYPE

(Date Filed/ Received Stamp by CPUC)

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

Advice Letter (AL) #: 2626-G/2654-E

Subject of AL: Update the Methodology and Forecast of Long-Term Avoided Cost(s) for the Evaluation of California Energy Efficiency Programs

Keywords (choose from CPUC listing): Avoided Cost, Compliance, Energy Efficiency

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

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

Decision 05-04-024

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: Not applicable

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

Resolution Required? Yes No

Requested effective date: 05/25/2005

No. of tariff sheets: 0

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: None

Service affected and changes proposed¹: _____

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

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

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

Pacific Gas and Electric Company

Attn: Brian K. Cherry

Director, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

¹ Discuss in AL if more space is needed.

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Attachment A

This document provides a summary of the input data sources used to compute the electric and gas avoided costs. The two main sources of data are the *Revised 2004 Market Price Referent (MPR) Staff Report*, February 10, 2005 ('MPR Report'), and *Methodology and Forecast of Long-Term Avoided Costs(s) for the Evaluation of California Energy Efficiency Programs*, October 25, 2004 ('E3 Report'). This document compiles the sources used from each report, and provides a complete set of references for inputs to the avoided cost calculations that are compliant with the Interim Opinion on E3 Avoided Cost Methodology, 4-7-2005, Rulemaking 04-04-025.

Table 1: Inputs Updated in Electric Avoided Cost Model Non-Gas Inputs

Input Data and Brief Description	Decision Reference / Workshop Input	New Value (or reference to new value)	Original Reference in E3 Report (Page #)	Cell or Range in Electric Avoided Cost Model (cpucAvoided26.xls)
Platts 2006, 2007 NP15 and SP15 Forward Prices As of 4/7/2005	Consensus Opinion	See Table 1A, below	Page 47	MarketForecast!A24:C25
CCGT Capital Cost (In-Service Cost)	Decision Page 34 (MPR Report)	\$720/kW (2004 cost)	Page 63	LRMC!G9 has 2004 cost inflated to 2006
CCGT Fixed O&M	Decision Page 34 (MPR Report)	\$6.00/kW-yr (2005 cost)	Page 63	LRMC!G10 has 2005 cost inflated to 2006
CCGT Variable O&M	Decision Page 34 (MPR Report)	\$2.50 mills/kWh (2005 cost)	Page 63	LRMC!G13 has 2005 cost inflated to 2006
CCGT Average Heat Rate	Decision Page 34 (MPR Report)	7,193 Btu/kWh HHV	Page 63	LRMC!G5
20-year Return on Equity	Decision	12%/yr	Page 63	LRMC!G17

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(CCGT Financing)	Page 34 (MPR Report)			
Interest Rate on Debt (CCGT Financing)	Decision Page 34 (MPR Report)	6.50%/yr	Page 63	LRMCIG16
Debt as % of Total Cost (CCGT Financing)	Decision Page 34 (MPR Report)	70%	Page 63	LRMCIG15
Debt Term (CCGT Financing)	Decision Page 34	20 Years	Page 63	LRMCIG7
CCGT Capacity Factor	Decision Page 34 (MPR Report)	92.00%	Page 63	LRMCIG6
Federal Tax Rate (of CCGT Owner)	Decision Page 35 (MPR Report)	35%	Page 63	LRMCIG18 has combined income tax
State Tax Rate (of CCGT Owner)	Decision Page 35 (MPR Report)	8.84%	Page 63	LRMCIG18 has combined income tax
Property Taxes as % of Plant Cost	Decision Page 35 (MPR Report)	1.20%	Page 63	LRMCIG11

Table 1A: 2006 and 2007 Platts Forward Price Quotes for NP15, SP15

Forward On-Peak Prices as of April 7 - Platts (\$/MWh)		
Delivery Location	2006	2007
NP15	\$ 77.50	\$ 72.75
SP15	\$ 79.00	\$ 75.25

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Table 2: Inputs Updated for Forecast of Delivered Electric Generation Natural Gas Prices

Input Data and Brief Description	Decision Reference / Workshop Input	New Value (or reference to new value)	Original Reference in E3 Report (Page #)	Cell or Range in Gas Avoided Cost Model (GasInputs4-7-2005.xls)
EIA, SoCal Gas, & CEC long-run forecast of Henry Hub natural gas prices	Decision Page 35	See Table 2A, below.	CEC Forecast, Page 171	MPRForecast!B6:E25
PG&E Gas distribution rate for EG as of 4/7/2005	Consensus opinion	See Table 2B, below.	Page 184	Delivery Tariff!C3:C7
SoCal Gas distribution rate for EG as of 4/7/2005	Consensus opinion	See Table 2C, below.	Page 184	Delivery Tariff!C15:C17
SDG&E Gas distribution rate for EG as of 4/7/2005	Consensus opinion	See Table 2D, below.	Page 184	Delivery Tariff!C23
Gas distribution rate escalation rate	Decision Page 34-35	2%	Not Used	Inputs!W23
60-day average of NYMEX futures contracts at Henry Hub through 4/7/2005	Decision Page 35	See Table 2E, below.	Page 181	NYMEX Futures sheet
NYMEX Basis between Henry Hub and PG&E Citygate as of 4/7/2005	Consensus opinion at workshop	See Table 2F, below.	Page 186	Inputs!T18:T41
NYMEX Basis differentials between Henry Hub and SoCal gas as of 4/7/2005	Consensus opinion at workshop	See Table 2G, below.	Page 186	Inputs!Q18:Q41

Table 2A: CEC, EIA, and SoCal Gas Long-run Fundamentals Forecast

Average of Henry Hub Fundamentals Natural Gas Prices

Row	Year	SoCal Gas			Average
		CEC 4/8/2003	EIA 1/2005	Gas 4/2/04	
1	2006	\$ 4.06	\$ 5.34	\$ 5.06	\$ 4.82
2	2007	\$ 4.31	\$ 4.93	\$ 5.16	\$ 4.80
3	2008	\$ 4.46	\$ 4.57	\$ 5.12	\$ 4.72
4	2009	\$ 4.67	\$ 4.55	\$ 5.04	\$ 4.75
5	2010	\$ 4.85	\$ 4.51	\$ 5.02	\$ 4.80
6	2011	\$ 5.04	\$ 4.62	\$ 5.00	\$ 4.89
7	2012	\$ 5.24	\$ 4.87	\$ 4.98	\$ 5.03
8	2013	\$ 5.46	\$ 5.13	\$ 4.96	\$ 5.18
9	2014	\$ 5.69	\$ 5.49	\$ 5.10	\$ 5.43
10	2015	\$ 5.93	\$ 5.81	\$ 5.25	\$ 5.66
11	2016	\$ 6.18	\$ 5.85	\$ 5.39	\$ 5.81
12	2017	\$ 6.39	\$ 5.98	\$ 5.55	\$ 5.97
13	2018	\$ 6.71	\$ 6.32	\$ 5.72	\$ 6.25
14	2019	\$ 6.99	\$ 6.76	\$ 5.89	\$ 6.55
15	2020	\$ 7.27	\$ 7.21	\$ 5.96	\$ 6.81
16	2021	\$ 7.57	\$ 7.58	\$ 6.15	\$ 7.10
17	2022	\$ 7.90	\$ 7.84	\$ 6.34	\$ 7.36
18	2023	\$ 8.17	\$ 8.10	\$ 6.54	\$ 7.60
19	2024	\$ 8.47	\$ 8.45	\$ 6.75	\$ 7.89
20	2025	\$ 8.77	\$ 8.85	\$ 6.96	\$ 8.19
21	2026	\$ 9.06	\$ 9.10	\$ 7.16	\$ 8.44
22	2027	\$ 9.36	\$ 9.42	\$ 7.36	\$ 8.71
23	2028	\$ 9.65	\$ 9.73	\$ 7.56	\$ 8.98
24	2029	\$ 9.95	\$ 10.04	\$ 7.77	\$ 9.25
25	2030	\$ 10.24	\$ 10.36	\$ 7.97	\$ 9.52

CEC Forecast Conversion Notes:

Price Forecasts from California Energy Commission Natural Gas Assessment, August 2003, Publication 100-03-006, Appendix E

Adjusted to Nominal Dollars using Price Deflator from California Energy Commission Natural Gas Assessment, August 2003, Publication 100-03-006, Appendix F

Forecasted Years 2023 through 2030 Using Linear Trend

Subtracted EG Delivery Prices (as of 4/7/2005) for PG&E, SoCal Gas EG Prices, see Tables 2B, and 2C.

Computed average PG&E and SoCal Gas Border Prices

CA Border Prices are assumed to equal Henry Hub price in the long term based on E3 Report, page 243.

EIA Forecast Calculation Notes:

Used January 2005 Wellhead Gas Forecast

(http://www.eia.doe.gov/oiaf/aeo/pdf/aeotab_14.pdf)

Converted from 2003 Dollars to Nominal Using EIA Deflators

(http://www.eia.doe.gov/oiaf/aeo/pdf/aeotab_19.pdf)

Converted from Wellhead to Henry Hub using EIA Factor (10.8%)

(http://www.eia.doe.gov/oiaf/aeo/pdf/aeotab_19.pdf)

Converted from Mcf to MMBtu using EIA Factor for Gas Production

([http://www.eia.doe.gov/oiaf/aeo/pdf/0383\(2005\).pdf](http://www.eia.doe.gov/oiaf/aeo/pdf/0383(2005).pdf))

SoCal Gas Calculation Notes:

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No Conversion Necessary for SoCal Gas Forecasted Henry Hub Prices (source Southern California Gas Company, 2004 California Gas Report Workpapers Table 1-6)

Table 2B: PG&E Gas Distribution Rate for Electric Generation as of 4/7/2005

Row	Calculation of PG&E Delivery Rate to Electric Generation	
1	Customer Access Charge (\$/day)	\$174.31134 http://www.pge.com/tariffs/pdf/G-EG.pdf
2	Proxy Plant Capacity (MW)	500 Table 1 Above (MPR Staff Report Appendix B)
3	Heat Rate (MMBtu/MWh)	7.193 Table 1 Above (MPR Staff Report Appendix C)
4	Capacity Factor	0.92 Table 1 Above (MPR Staff Report Appendix C)
5	Average Monthly Gas Consumption (MMBtu)	2,415,409 Row 2 * Row 3 * Row 4 * 8760 / 12
6	Unit Cost of Customer Access Charge (\$/MMBtu)	\$0.0022 (Row 1 * 365) / (Row 5 * 12)
7	Transportation Charge (\$/MMBtu)	\$0.1531 http://www.pge.com/tariffs/pdf/G-EG.pdf
8	Total PG&E Distribution Rate (\$/MMBtu)	\$0.1553 Row 6 + Row 7
9	PG&E Muni Surcharge, Schedule G-SUR (\$/MMBtu)	0.9765% http://www.pge.com/tariffs/pdf/G-SUR.pdf

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Table 2C: SoCal Gas Distribution Rate for Electric Generation as of 4/7/2005

Row	Calculation of SoCal Gas Delivery Rate to Electric Generation		
1	Customer Charge (\$/month)	\$0.00	http://www.socalgas.com/regulatory/tariffs/tm2/pdf/GT F.pdf
2	Transmission Charge (\$/MMBtu)	\$0.3349	http://www.socalgas.com/regulatory/tariffs/tm2/pdf/GT F.pdf
3	Interstate Transition Cost Surcharge (\$/MMBtu)	\$0.0306	http://www.socalgas.com/regulatory/tariffs/tm2/pdf/GT F.pdf
4	Total SoCal Distribution Rate (\$/MMBtu)	\$0.3655 Row 1 + Row 2 + Row 3	
5	SoCal Muni Surcharge, Schedule G-MSUR (%)	1.5534%	http://www.socalgas.com/regulatory/tariffs/tm2/pdf/G-MSUR.pdf

Table 2D: SDG&E Gas Distribution Rate for Electric Generation as of 4/7/2005

Row	Calculation of SDG&E Gas Delivery Rate to Electric Generation	
1	Group B Volumetric Charges (\$/therm)	\$0.3655 http://www.sdge.com/tm2/pdf/EG.pdf

Table 2E: 60-Day Average of NYMEX Henry Hub Gas Futures Contracts through 4/7/2005

(Nominal \$/MMBtu)

60-Day Average NYMEX Closing Prices (1/11/2005-4/7/2005)					
Month	Year				
	2006	2007	2008	2009	2010
January	7.81	7.31	6.87	6.49	6.19
February	7.79	7.28	6.85	6.47	6.17
March	7.61	7.09	6.65	6.28	5.99
April	6.56	6.15	5.76	5.43	5.15
May	6.42	6.01	5.64	5.31	5.04
June	6.44	6.03	5.66	5.34	5.07
July	6.47	6.05	5.69	5.36	5.09
August	6.50	6.07	5.71	5.39	5.12
September	6.48	6.05	5.69	5.37	5.12
October	6.50	6.07	5.71	5.40	5.15
November	6.81	6.36	5.98	5.68	5.39
December	7.09	6.64	6.25	5.96	5.64

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Table 2F: NYMEX Henry Hub -PG&E Citygate Basis Differentials as of 4/7/2005

Contract	PG&E Citygate 7-Apr
Jan-06	-0.1575
Feb-06	-0.1575
Mar-06	-0.1575
Apr-06	0.0725
May-06	0.0725
Jun-06	0.0725
Jul-06	0.0725
Aug-06	0.0725
Sep-06	0.0725
Oct-06	0.0725
Nov-06	-0.0750
Dec-06	-0.0750
Jan-07	-0.0750
Feb-07	-0.0750
Mar-07	-0.0750
Apr-07	0.0925
May-07	0.0925
Jun-07	0.0925
Jul-07	0.0925
Aug-07	0.0925
Sep-07	0.0925
Oct-07	0.0925
Nov-07	-0.0400
Dec-07	-0.0400

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Table 2G: NYMEX Henry Hub – SoCal Gas Basis Differentials as of 4/7/2005

Contract	SoCal Gas 7-Apr
Jan-06	-0.4975
Feb-06	-0.4975
Mar-06	-0.4975
Apr-06	-0.3025
May-06	-0.3025
Jun-06	-0.3025
Jul-06	-0.3025
Aug-06	-0.3025
Sep-06	-0.3025
Oct-06	-0.3025
Nov-06	-0.4325
Dec-06	-0.4325
Jan-07	-0.4325
Feb-07	-0.4325
Mar-07	-0.4325
Apr-07	-0.2600
May-07	-0.2600
Jun-07	-0.2600
Jul-07	-0.2600
Aug-07	-0.2600
Sep-07	-0.2600
Oct-07	-0.2600
Nov-07	-0.3800
Dec-07	-0.3800

Table 3: Adjustments Made for a 2006 Start Year

Input	Description of Adjustment
CCGT Capital Cost to 2006 Value	Adjusted CCGT cost from MPR Decision \$720/kW in 2004 to 2006 using 2% escalation rate from E3 Report, page 63. (MPR decision does not provide a CCGT capacity cost escalation factor).
Electric Transmission Avoided Costs	Begin analysis using 2006 avoided cost cited in E3 report (page 136 and 137).
Electric Distribution Avoided Costs	Begin analysis using 2006 avoided cost cited in the E3 report (pages 132-136).
CO2 Emissions Costs	Begin analysis using 2006 avoided cost cited in E3 report (page 79).
Gas Transportation Marginal Costs	Begin analysis using 2006 avoided cost based on 2004 costs cited in E3 report (page 138) and escalated through the study period.

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Table 4: Adjustments Made to Extend Forecast through 2030

Input	Description of Adjustment
Long-run Gas Forecast \$/MMBtu	Linear trend of the last five years (2021 through 2025) of the three public forecasts (EIA, CEC, and SoCal) for years 2026 through 2030.
Electric Transmission Avoided Cost \$/kW-year	Linear trend of the last five years in E3 Report (2019 through 2023) through 2030
Electric Distribution Avoided Cost \$/kW-year	Linear trend of the last five years in E3 Report (2019 through 2023) through 2030
Emissions Costs (CO ₂ , PM ₁₀ , NO _x) \$/lb	Linear trend of the last five years in E3 Report (2019 through 2023) through 2030
Gas Transportation Marginal Costs \$/MMBtu	Linear trend of the last five years in E3 Report (2019 through 2023) through 2030

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

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