



FILED

02-03-09

04:59 PM

APPENDIX A

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the California Solar
Initiative, the Self-Generation Incentive Program
and Other Distributed Generation Issues.**

**Rulemaking 08-03-008
(Filed March 13, 2008)**

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E), ON BEHALF OF THE SELF GENERATION
INCENTIVE PROGRAM ADMINISTRATORS TO
APPROVE PLAN FOR MEASUREMENT AND
EVALUATION REPORTS FOR PROGRAM YEARS 2009
TO 2011**

**RANDALL J. LITTENEKER
STACY W. WALTER**

**Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
Telephone: (415) 973-2179
Facsimile: (415) 973-0516
E-Mail: rjl9@pge.com**

**Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY**

December 4, 2008

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the California Solar
Initiative, the Self-Generation Incentive Program
and Other Distributed Generation Issues.**

**Rulemaking 08-03-008
(Filed March 13, 2008)**

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E), ON BEHALF OF THE SELF GENERATION
INCENTIVE PROGRAM ADMINISTRATORS TO APPROVE
PLAN FOR MEASUREMENT AND EVALUATION REPORTS
FOR PROGRAM YEARS 2009 TO 2011**

I. EXECUTIVE SUMMARY

In accordance with Rule 11.1 of the California Public Utilities Commission's (CPUC or Commission) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E), on behalf of the Program Administrators (PAs) of the Self-Generation Incentive Program (SGIP) respectfully submits this motion seeking approval of their proposal for Measurement and Evaluation (M&E) Reports for the SGIP for Program Years (PY) 2009 to 2011. The SGIP operates in the service areas of PG&E, Southern California Edison Company (SCE), Southern California Gas Company (SCG) and San Diego Gas and Electric Company (SDG&E). The SGIP is administered by PG&E, SCG and SCE in their respective service territories. The California Center for Sustainable Energy (CCSE) administers the SGIP in SDG&E's service territory. The SGIP PAs have authorized PG&E to make this filing on their behalf.

The SGIP has been in existence since 2001, and various prior CPUC Orders directed the completion of various M&E Reports through 2008.¹ However, the legislature has directed the CPUC to continue the SGIP through January 1, 2012. See California Public Utilities Code

¹ These orders include Decision 02-09-051 and the ALJ Ruling of April 24, 2002 in Rulemaking 99-10-025 and the May 18, 2006 Administrative Law Judge's Ruling Approving Plan For 2006 and 2007 Measurement and Evaluation Reports, issued in Rulemaking 06-03-004,. The deadlines in these Orders have also been adjusted on several occasions, such as the ALJ Rulings of February 27, 2007, and June 24, 2008.

Section 379.6(a)(1). The Commission is considering various details of the SGIP program for 2009-2011, including incentives and overall budget. See *Administrative Law Judge's Ruling Requesting Comments On The Continued Operation Of The Self Generation Incentive Program Through 2011* (Ruling), which was issued on September 17, 2008. However, the Ruling did not address an M&E component of the program. For this reason, Energy Division requested that the PAs develop an M&E proposal, and present it to the CPUC via motion as had been done in the past. Accordingly, we file this motion.

This proposal by the PAs, which has been approved by the SGIP Working Group (WG), includes an overview description of the studies to be conducted, the approximate schedules and estimated overall cost for M&E activities proposed by the SGIP PAs for the 2009-2011 program cycle. It also includes recommendations on the likely third parties to perform this work, or a process for selecting new contractors to the extent the studies are new.

Two purposes of this M&E activity are to continue prior studies mandated by the CPUC in the past where still relevant, and to answer questions related to the program's future (should the program continue beyond 2011, and, if so, how should it work?) Within these categories, six studies are proposed:

- ◆ Annual Impact Evaluations: Collect data, conduct analyses and provide annual impact evaluations on the SGIP for program years 2009, 2010 and 2011;
- ◆ Renewable Fuel Use: Prepare semi-annual renewable fuel use reports extending from September 2009 through September 2011 (a total of 5 reports);
- ◆ Market Characterization Study: Conduct analyses of the market for self-generation technologies, and prepare a related report and custom on-site briefings for each PA and roll-up briefing for CPUC staff;
- ◆ Market-Focused Process Evaluation: Conduct analyses and prepare a report on SGIP processes and the interaction between these processes and the current market needs;
- ◆ Market Transformation Study: Conduct analyses and prepare a market transformation report on distributed generation technologies;
- ◆ Final Program Summary: Prepare a final summary report covering the entirety of the SGIP from its inception in 2001 through the end of 2011.

While no specific overall budget or M&E budget has been determined by the CPUC for the 2009-2011 program cycle, in accordance with CPUC decisions for past SGIP program year budgets, the targeted overall budget for administration, marketing, and measurement and evaluation expenditures should not exceed 10 percent of SGIP funding on an annual basis. A preliminary estimate of the cost of each study has been prepared, and the total estimated cost for

the six sets of studies listed above is \$3,450,000. The work would be funded by the four SGIP PAs through a co-funding agreement based on the current CPUC-approved budget allocation (PG&E 44 percent, SCE 34 percent, SDG&E/CCSE 13 percent and SCG 9 percent) for shared expenses, with metering costs added as specific to each PA (i.e., meter equipment and installation costs are paid by the PA in whose service territory installation occurs). More detail on study activities and schedules is provided below.

The recommended reports are consistent with the reports prepared in earlier years. The Renewable Fuel Use Reports and Impact Evaluation Reports continue on a delivery schedule previously established by the CPUC in the earliest program years. In addition, studies first proposed in 2006 which would continue are: (1) a retention study to assess the long-term persistence of impacts from self-generation technologies installed through the program; (2) a market characterization study to identify customers and markets that have high potential for successful installations of self-generation technologies; and (3) a process evaluation focused on improving the way the program processes mesh with market processes.

In addition, two new reports are proposed: a Market Transformation Study Report to be completed in 2010; and a Final Program Summary Report to be completed in 2014.

All reports would be prepared by independent contractors. The PAs propose that five of these six reports be prepared by the vendors that now prepare these reports, which are Itron Consulting and Summit Blue Consulting. The sixth report, the Market Transformation Study, should be prepared by a contractor selected by competitive bid.

The PAs believe that it would be appropriate, beneficial, and cost effective to continue M&E activities uninterrupted through PY 2011.

II. DETAILS OF PROPOSED REPORTS

A. Proposed Schedule of 2009-2011 M&E Studies

Study/Activity	Report/Deliverable	Final Report Due
Annual Impact Evaluations		
	PY 2009 Impact Evaluation Report	June 25, 2010
	PY 2010 Impact Evaluation Report	June 24, 2011

	PY 2011 Impact Evaluation Report	June 22, 2012
Renewable Fuel Use Reports		
	Renewable Fuel Use Report #14	September 17, 2009
	Renewable Fuel Use Report #15	March 19, 2010
	Renewable Fuel Use Report #16	September 17, 2010
	Renewable Fuel Use Report #17	March 18, 2011
	Renewable Fuel Use Report #18	September 16, 2011
Market Characterization Study		
	Market Characterization Study Report	February 15, 2010
	Custom on-site local briefings for each PA	June 15, 2010
	Roll-up briefing for CPUC staff	July 8, 2010
Market-Focused Process Evaluation	Market-Focused Process Evaluation Report	May 17, 2010
Market Transformation Study	Market Transformation Study Report	August 16, 2010
Final Program Summary	Final SGIP Summary Report	June 13, 2014

B. Description of Proposed M&E Studies For Program Years 2009-2011

The following paragraphs provide a brief description of each of the studies proposed.

1. Impact Reports

The PAs propose to continue the previously adopted schedule for Impact Reports into 2012 for results of installations through PY 2011.

The SGIP has undergone significant changes since its inception in 2001. For example, the portfolio of distributed generation (DG) technologies in the SGIP has changed with emergence of the California Solar Initiative (CSI)² and new requirements for clean DG technologies. In addition, each class of DG technologies has evolved in both performance and costs. While the make up of DG technologies has shifted, the SGIP remains the largest population of DG technologies operating in a California commercial setting. As such, it represents a wealth of information on the performance of DG technologies over time and with changes in California's energy and environmental landscape. Impact evaluation reports are critical to capturing important trends and assessing the affect of these changes on the electricity system.

Among the impacts to be assessed under the annual impacts evaluation are the following:

- Electrical energy production and demand reduction by specific time periods (e.g., peak hour as well as seasonal) and by DG technology category;
- Operating and reliability performance characteristics (e.g., capacity factor) for each DG technology and the overall family of DG technologies;
- Electrical, thermal and overall efficiencies and the contribution of DG technologies to electricity system efficiency and reliability;
- Extent to which SGIP technologies employ renewable fuels and the impact of that fuel use on performance and cost characteristics;
- The impacts of DG technologies on transmission and distribution (T&D) system performance, reliability, and operations, with special consideration given to the importance of location of higher concentrations of DG technologies on T&D congestion and its relationship to location marginal pricing;
- The extent to which DG technologies can provide net greenhouse gas (GHG) emissions reductions and special considerations to changes in DG design or operation that could lead to improved GHG emission reductions; and
- The relationship between DG operation and T&D operations with special emphasis on ways in which DG operation can be synchronized and integrated to help relieve peak loading and provide information on operational aspects of bringing dynamic DG operation towards a SmartGrid platform.

Main activities for this study include: collecting and processing primary data on net electricity generation data, fuel use and thermal energy use on SGIP projects; collecting and analyzing secondary data from third parties and from the utilities on transmission and distribution system operations and line loadings; analyzing the processed data for trends and impact assessments; and preparing the annual impact evaluation reports. Topical studies and

² PV was moved to CSI effective 1/1/07 per AB 2778.

reports will be prepared to improve understanding of the locational aspects of DG technologies within the T&D system and the operational aspects of integrating these resources to improve T&D reliability and performance.

Table 1: Annual Impact Evaluations Deliverables and Due Dates

Deliverable	Final Report Due
PY 2009 Impact Evaluation Report	June 25, 2010
PY 2010 Impact Evaluation Report	June 24, 2011
PY 2011 Impact Evaluation Report	June 22, 2012

2. 2009-2011 Renewable Fuel Use Reports

The PAs propose to continue submitting twice yearly renewable fuel use (RFU) reports through the end of the PY 2011. In accordance with CPUC Decision 02-09-051 (September 19, 2002), SGIP projects using renewable fuels must achieve specified fuel use requirements. In addition, with increased interest in reducing GHG emissions, there is increased emphasis on the ability of DG technologies to use renewable fuels and to understand the operational and cost implications of increased renewable fuel use. Fundamentally, the overall goal of the Renewable Fuel Use Reports is to help the CPUC staff and the SGIP PAs in making recommendations concerning modifications to the renewable project aspects of the SGIP. Consequently, the first objective of these reports is to identify and report on the compliance of renewable fuel use projects receiving incentives under the SGIP with renewable fuel use requirements. The second objective is to identify the operational and cost characteristics of RFU projects and to evaluate the implications of increased renewable fuel use on the SGIP.

Main activities for this study include: collecting data on renewable fuel use at each renewable fuel use project; assessing compliance of the project with the fuel use requirements; identifying and analyzing the operational and cost characteristics of the renewable fuel use technologies employed at the projects; and preparing the results into semi-annual renewable fuel use reports.

Table 2: Renewable Fuel Use Report (RFUR) Deliverables and Due Dates

Deliverable	Final Report Due
RFUR #14	September 17, 2009
RFUR #15	March 19, 2010
RFUR #16	September 17, 2010
RFUR #17	March 18, 2011
RFUR #18	September 16, 2011

3. Market Characterization Study

The Market Characterization Study would assess the market for self-generation technologies by reviewing the market structure and context in which SGIP operates, and analyzing customers with both successful and unsuccessful SGIP installations and identifying factors critical to success. The main research objectives and activities of the study include:

- Investigate the current market structure for wind/fuel cell developers in light of the SGIP;
- Identify socio-economic factors that correlate with program participation and non-participation, with an appreciation for variation in regional market characteristics;
- Develop detailed case studies of successful and unsuccessful projects, with a focus on fuel cells and wind, but also including a sampling of projects completed after the last evaluation, i.e., post PY 2006;
- Identify promising sites/host customers for wind turbines through GIS techniques;
- Identify market barriers relative to the current SGIP program design, e.g. relatively few wind and fuel cell projects have been funded under the SGIP. What market barriers exist to program operation;
- What lessons have other states with fuel cell and/or wind programs learned from incenting these technologies;
- Develop actionable recommendations to overcome these market barriers;
- Review the market context within which the SGIP operates. Several new Feed-In-Tariff style programs have been developed in the state and at the IOUs for specific customer classes (e.g. work with dairies, public water and wastewater systems), in addition CARB has targeted landfills as an early action measure for AB32, and renewable energy credit (REC) definitions and renewable portfolio standard (RPS) pressures have also evolved to likely effect market beliefs surrounding the value of distributed energy.

a) On-Site Briefings

On-site briefings on information gained through market and program operation evaluations are intended to help PAs address related specific strengths and challenges, and to inform the CPUC decision-making process for related future efforts. Based on past reported usefulness of these presentations, as in 2007, the briefings will focus on providing a customized review to the PAs and CPUC on information collected and analyses performed for the SGIP WG.

While for the purposes of this proposal the briefings are considered a deliverable of the Market Characterization Study, the findings presented in them will include results from both the Market Characterization Study and the Market-Focused Process Evaluation (as described below), including the surveys completed with host customers and non-participants in the SGIP. A geographical information system (GIS) analysis will also be included showing locations of current SGIP applications and projects as well as statewide marketing opportunities.

The main activities for this study include: in-depth interviews with PA and CPUC staff; informational interviews with other relevant investor owned utilities (IOU) and California Energy Commission (CEC) staff (e.g., Interconnection and Marketing Departments) as well as other relevant market actors (e.g., managers of CSI and feed in program tariffs); and in-depth developer interviews (participating and non-participating), telephone surveys and in-depth interviews with program participants, non-participants and drop-outs (including follow up with projects that transitioned from active to complete).

Table 3: Market Characterization Study Deliverables and Due Dates

Deliverable	Final Report/Presentation Due
Market Characterization Study Report	February 15, 2010
Custom on-site local briefings for each PA	June 15, 2010
Roll-up briefing for CPUC staff	July 8, 2010

4. Market-Focused Process Evaluation

The Market-Focused Process Evaluation would examine SGIP processes and review the interaction between these processes and the current market needs. It would focus on how the market responds to the SGIP and how program processes or requirements can be refined or modified to better meet the needs of the various market actors. The study would include the following main activities:

- Update research conducted through PY 2006 to confirm or correct trends reported in the 2007 Market-Focused Process Evaluation. Note that this would include projects beyond wind and fuel cells as the review of project data indicates that at the close of 2006 over 600 projects were classified as “active.” An example topic to be updated would be the trend in public versus private entity participation and completion rates. Also, the previous

trends on participation and natural gas pricing should be revisited, in light of decreasing cogeneration participation and ongoing performance;

- Document and capture process “learnings” from specific technologies in the SGIP for future program design, including technologies that have been a part of the SGIP but are not currently (i.e., broader than fuel cells and wind). This could also include the process issues implicated in the PMG process and the efforts of advanced energy storage stakeholders;
- Update and document the social and economic factors relating to program participation. For example, the increasing interest in distributed generation (DG) solutions should be placed in the context of the increasing awareness of greenhouse gas issues as well as the reduction in available capital for investment in DG solutions;
- Review the PAs’ marketing efforts to understand and document leveragable success stories and potentially missed opportunities. Explore the appropriate marketing approaches for the SGIP in the context of the CPUC’s integrated marketing vision;
- Consider the effects of the former ERP and CSI on the SGIP. For example, previous research identified staffing and budget concerns for the SGIP as key considerations in light of the effort to launch and grow CSI efforts. It should be explored whether the full launch of CSI has created a mechanism that also may be “feeding” the SGIP. Also anecdotal evidence indicated that ERP participation by individuals is correlated to company participation in the SGIP. Other learnings regarding should be identified and captured, particularly concerning system sizing and program design;
- Prepare market-based recommendations to support decision-making regarding the future design and continuation of the SGIP beyond 2011.

Main activities for this study include a detailed program record review, in-depth interviews with PA and CPUC staff, informational interviews with other relevant IOU and CEC staff (e.g., Interconnection and Marketing Departments) as well as other relevant market actors (e.g., managers of CSI and feed in program tariffs), in-depth developer interviews (participating), telephone surveys and in-depth interviews with program participants (including follow up with projects that transitioned from active to complete) and drop-outs.

Table 4: Market-Focused Process Evaluation Deliverables and Due Dates

Deliverable	Final Report Due
Market-Focused Process Evaluation Report	May 17, 2010

5. Market Transformation Study

Policies on renewable energy and DG are meant to encourage behaviors which result in increased overall societal benefits. The SGIP and the more recently established CSI represent incentive programs that seek market adoption of technologies to provide short-term benefits to

the public. In addition, the SGIP and CSI are also meant to transform the DG electricity market over the long term so that distributed renewable and distributed conventional generation resources become cost-effective and create a sustainable DG market.

Chances for achieving market transformation are enhanced by linking objectives to specific actionable items, such as needed technology and market changes. In turn, there should be clear identification and connection to the key players able to effect the changes. Lastly, metrics for measuring progress toward the goals provides for any needed corrective actions.

The Market Transformation study will:

- Examine the relationships between the goal of transforming DG technologies under the SGIP, the necessary technology and market changes to transform DG technologies, the key players involved in those changes and the metrics for measuring success in reaching a transformed DG market;
- Investigate the extent to which market transformation activities have occurred under the SGIP; and
- Develop a methodology to evaluate both the short-term and long-term benefits of a transformed DG market, with the intent of helping provide a framework for the CPUC to examine market transformation within context of the cost-effectiveness of DG technologies.

Main activities for this study include establishing levelized cost of energy (LCOE) models that take into account market transformation activities; conducting surveys on market players and market actions to populate a framework that relates market transformation of DG technologies to their cost-effectiveness; conducting scenario analyses that provide quantification of the impacts of the various market transformation activities; pinpointing those activities that will have the most impact on developing a cost-effective and sustainable DG market; identifying metrics for measuring progress of the recommended market transformation objectives; and developing estimates of the resulting benefits (e.g., energy, environmental and cost) and preparing a report on the findings.

Table 5: Market Transformation Study Deliverables, Due Dates & Costs

Deliverable	Final Report Due
Market Transformation Study Report	August 16, 2010

6. Final Program Summary Report

December 31, 2011 will represent the conclusion of the 11th program year for the SGIP. Over the course of the SGIP, it is anticipated that the PAs will have received thousands of applications for on-site DG projects and over a thousand DG projects will have been deployed. Due to the wide variety of DG technologies deployed under the SGIP and the extensive amount of data collected over the course of the SGIP, the program will be able to provide truly unique insights into the actual costs, performance, practices and processes of DG deployed in a commercial setting. A summary report on the SGIP can provide both a retrospective set of lessons learned and a springboard for setting future DG policies and programs.

The Final SGIP Summary Report would provide a comprehensive review of the SGIP. Topics in the report will include the following:

- Goals of the program (original and changes as new policies emerged);
- Achievements of the program
 - ◆ Projects installed (e.g., overall, by DG type, rebated capacity and locations)
 - ◆ Impacts (e.g., electricity generated, coincident peak contributions, system efficiency impacts, T&D impacts and GHG emission reductions)
 - ◆ Trends (e.g., costs, technology specific and cumulative rebated capacities, average capacity factors by technology and overall, changes in efficiencies and renewable fuel use);
- Market transformation aspects
 - ◆ Market transformation goals
 - ◆ Level of success of market transformation activities;
- Lessons learned and recommendations

The main activities for this effort include analyzing historical data collected over the course of the SGIP and preparing the results into draft and final versions.

Table 6: Final Program Summary Report Deliverable and Due Date

Deliverable	Final Report Due
Final Program Summary Report	June 13, 2014

Summary of M&E Activities

Table 7: Summary of 2009-2011 SGIP M&E Deliverables and Due Dates

Study/Activity	Report/Deliverable	Final Report Due
Annual Impact Evaluations		
	PY 2009 Impact Evaluation Report	June 25, 2010
	PY 2010 Impact Evaluation Report	June 24, 2011
	PY 2011 Impact Evaluation Report	June 22, 2012
Renewable Fuel Use Reports		
	Renewable Fuel Use Report #14	September 17, 2009
	Renewable Fuel Use Report #15	March 19, 2010
	Renewable Fuel Use Report #16	September 17, 2010
	Renewable Fuel Use Report #17	March 18, 2011
	Renewable Fuel Use Report #18	September 16, 2011
Market Characterization Study		
	Market Characterization Study Report	February 15, 2010
	Custom on-site local briefings for each PA	June 15, 2010
	Roll-up briefing for CPUC staff	July 8, 2010
Market-Focused Process Evaluation	Market-Focused Process Evaluation Report	May 17, 2010
Market Transformation Study	Market Transformation Study Report	August 16, 2010
Final Program Summary	Final SGIP Summary Report	June 13, 2014

C. Contracting Process

In order to cost-effectively and efficiently conduct M&E activities beginning as required for the 2009-2011 program cycle, the SGIP WG recommends that most of the work as described above be conducted by evaluators already intimately familiar with the SGIP and proven in their ability to conduct robust studies and provide the required deliverables. PG&E would contract with the two current evaluators and act as contract administrator. These are Itron Consulting and Summit Blue Consulting.

Itron Consulting has unique capabilities to conduct portions of the proposed work. As the prime SGIP M&E contractor since its inception in 2001, Itron has developed intimate knowledge of the characteristics and operation of DG technologies deployed under the SGIP. Itron also has hands-on familiarity with SGIP monitoring systems and extensive experience with collection and processing of SGIP project performance data. This familiarity has enabled the Itron project team to streamline the data management and quality control processes associated with handling the substantial amount of performance data generated by the SGIP.

Summit Blue Consulting is well versed in SGIP processes and importantly in the broader market context within which the program operates, including regional variations. During its previous SGIP research comparing administrative approaches and characterizing the market in California for DG and process review, Summit Blue developed a reputation for analytical rigor, market insight and unbiased, defensible reporting. By verifying program data from the program's start in 2001, Summit Blue was able to show the progressive market penetration of the SGIP by market segment and zip code to yield significant new insights into the program's operation and effect. As the developer of these and other visual metrics Summit Blue is uniquely qualified to cost-effectively update the prior research efforts.

Due to Itron's and Summit Blue's familiarity and knowledge of the SGIP, there should be no delays due to learning curve challenges or time and expense of transferring data to new contractors. Consequently, the PAs believe Itron and Summit Blue are uniquely positioned to provide the SGIP Working Group with expert services for much of the proposed evaluation activities, and recommend direct bidding the majority of the work to each consulting firm as described below, and competitive bidding the Market Transformation Study.

A Market Transformation Study has not yet been completed. The Program Administrators propose to select a contractor to perform the Market Transformation Study by

competitive bid.

The PAs propose that they retain the flexibility to replace any of these contractors, after consultation with the SGIP WG, if prudent administration suggests the need for a change.

III. CONCLUSION

The SGIP PAs appreciate this opportunity to describe their proposal for Measurement and Evaluation Reports for the Self-Generation Incentive Program (SGIP) for Program Years 2009-2011, and seek Commission approval of this proposal.

Respectfully submitted,

RANDALL J. LITTENEKER
STACY W. WALTER

By: _____ /s/
RANDALL J. LITTENEKER

Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
Telephone: (415) 973-2179
Facsimile: (415) 973-0516
E-Mail: rjl9@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

December 4, 2008

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 77 Beale Street, San Francisco, California 94105

On December 4, 2008, I served a true copy of:

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E), ON BEHALF OF THE SELF GENERATION
INCENTIVE PROGRAM ADMINISTRATORS TO
APPROVE PLAN FOR MEASUREMENT AND
EVALUATION REPORTS FOR PROGRAM YEARS 2009 TO 2011**

- [XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for R.08-03-008 with an e-mail address.
- [XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service list for R.08-03-008 without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 4th day of December 2008, at San Francisco, California.

/s/

PAT KOKASON