

## PUBLIC UTILITIES COMMISSION

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Jennifer K. Berg  
Assistant Director -Energy Programs  
Association of Bay Area Governments  
375 Beale Street 7<sup>th</sup> Floor  
San Francisco, CA 94105

December 18, 2020

Dear Ms. Berg:

Energy Division rejects the San Francisco Bay Area Regional Energy Network's (BayREN) Annual Budget Advice Letter (ABAL) 16-E-A, pursuant to the ABAL review criteria laid out in Decision (D.) 18-05-041, which addressed the energy efficiency business plans, but for reasons explained herein, we approve BayREN's proposed budget request of \$24,171,613 for 2021 to administer energy efficiency programs.

BayREN's ABAL is rejected because it failed to meet its savings targets<sup>1</sup> from its 2019 "true-up" ABAL.<sup>2</sup> However, the Assigned Commissioner and Administrative Law Judges' Amended Scoping Ruling Addressing Impacts of COVID-19 (July Ruling) acknowledged that program administrators (PAs) face a significantly changed landscape in 2020 and asked PAs to include "accurate and good faith estimates of energy efficiency costs and benefits, as well as budgets, that are necessary to address the current goals and strategies" in their respective program year 2021 ABAL.

The July Ruling also stated that "the 2021 and 2022 ABALs will serve a narrower purpose, to notify the California Public Utilities Commission (CPUC) and stakeholders of the budget and cost recovery and expenditures that each program administrator forecasts for 2021 and 2022...and be reviewed or approved or modified by CPUC staff disposition or resolution, whether or not they meet all of the criteria laid originally laid out in D. 18-05-041."<sup>3</sup> This narrower purpose allows for energy efficiency program activity to continue in advance of and throughout the new business plan applications to be filed by all PAs in September 2021, as called for in the July Ruling.<sup>4</sup>

Consequently, much like D.19-08-034 granted CPUC staff the authority to approve annual budgets for energy efficiency PA's ABAL which are aligned with the new energy savings goals or targets even in the event that a PA's ABAL is rejected, we rely here on the July Ruling to approve BayREN's spending budget and cost-recovery request.

Accordingly, BayREN's total spending budget request of \$24,171,613<sup>5</sup> for 2021 to administer energy efficiency programs effective January 1, 2021 is approved.

<sup>1</sup> See BayREN ABAL 16-E-A: Table 1: BayREN 2021 Budget and Savings (Net), which notes that BayREN does not forecast achieving its demand or therm goals from its PY 2019 ABAL.

<sup>2</sup> D.19-08-034, p. 28, states "Because RENs and CCAs do not have explicit energy efficiency savings goals as the IOUs do (through this decision), for each year that non-IOU program administrators request energy efficiency funding authorization via an ABAL, they shall meet or exceed the annual savings forecasts presented in their true-up tables as submitted in their PY 2019 ABALs (and subsequently approved in Energy Division's advice letter dispositions)."

<sup>3</sup> See Ruling, p. 9, at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M342/K189/342189331.PDF>

<sup>4</sup> Ibid.

<sup>5</sup> BayREN's total proposed spending budget for 2021 is \$24,171,613 less unspent and uncommitted funds from 2020 and prior years of \$6,700,029 resulting in a total budget recovery request of \$17,471,584.

Lastly, on September 30, 2020, the Governor signed AB 841, authorizing energy efficiency portfolio funding for the Schools Energy Efficiency Stimulus Program (SEESP) beginning in year 2021. Subsequently, on October 7, 2020, the CPUC issued a ruling in Rulemaking 13-11-005 seeking comments on the budget for the SEESP, indicating that the CPUC will decide through the formal proceeding AB 841 related budget issues. Given this, Energy Division will not delay authorization of the 2021 ABALs while the CPUC determines additional guidance on the SEESP budget pursuant to AB 841.

## 1. Background

On September 1, 2020, BayREN filed its ABAL 16-E and supplemental ABAL 16-E-A<sup>6</sup> that replaced 16-E on November 13, 2020. On October 1, 2020, the Public Advocates Office at the CPUC (Cal Advocates) and the Small Business Utility Advocates (SBUA) each filed their respective protests of BayREN's ABAL 16-E. On October 8, 2020, BayREN filed its response to the Cal Advocates and SBUA protests of ABAL 16-E.

## 2. Cal Advocates Protest and BayREN Reply Comments

Cal Advocates' protest included four items directed at BayREN's 2021 ABAL that ask the CPUC to:<sup>7</sup>

- Mandate that all PAs improve cost-effectiveness and reduce risk in their portfolios to respond to COVID-19-related uncertainties, including:
  - Requiring PAs to reduce spending on sectors with low cost-effectiveness; and
  - Requiring PAs to reallocate this spending to the Residential sector;
- Reject the RENs ABALs until they demonstrate progress towards cost-effectiveness;
- Order the RENs to reduce spending on sectors that have not demonstrated cost-effectiveness improvements over time; and
- Require PAs to standardize their accounting and reporting practices for unspent, uncommitted funds.

### 2.1. COVID-19 Impacts

In its protest, Cal Advocates argued that the COVID-19 pandemic requires:

- robust portfolios with minimal risks, and
- the CPUC to have all PAs modify their respective portfolios to improve cost-effectiveness by reducing spending on sectors with low cost-effectiveness and allocating more resources to the Residential sector.<sup>8</sup>

Cal Advocates' protest argued that the economic hardship created by COVID-19 for California ratepayers has led to a significant increase in residential energy consumption and that the PAs and

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<sup>6</sup> BayREN's supplemental ABAL 16-E-A applied the unspent and uncommitted funds to its 2021 cost-recovery request and thus lowered its requested budget for 2021.

<sup>7</sup> See *The Public Advocates Office's Protest of Energy Efficiency Annual Budget Advice Letters for Program Year 2021* (Cal Advocates Protest), September 1, 2020, p. 2.

<sup>8</sup> See Cal Advocates Protest, pp. 6-7.

CPUC should ensure portfolio cost-effectiveness and maximize benefits for every dollar spent to ensure more customers realize energy savings and lower bills. Cal Advocates' protest also stated that the July Ruling "should not be interpreted as an invitation for leniency in meeting cost-effectiveness requirements."<sup>9</sup> Lastly, Cal Advocates claimed that the CPUC should protect ratepayers by requiring modifications to create more robust energy efficiency portfolios and minimize the risk of underperformance during uncertain times and ratepayer funds being wasted on programs that deliver few benefits.<sup>10</sup> Cal Advocates recommended that the PAs reduce spending in non-cost-effective programs in the non-Residential sectors and reallocate budgets to the Residential sector.

In its reply, BayREN agreed with that Cal Advocates that "[r]esidential ratepayers are in greater need than ever for effective programs that can help alleviate COVID-19 induced financial strain by delivering meaningful energy savings and other benefits.<sup>11</sup> It noted that its single family Home + Program targets low- and middle-income homeowners and renters who are traditionally underserved in energy efficiency programs.<sup>12</sup> BayREN added that in addition to energy savings, this program also promotes the health benefits of energy retrofits, something of even greater concern during the COVID-19 pandemic.<sup>13</sup> During the pandemic, BayREN has expanded its contractor offerings by providing trainings, professional development and other activities to keep contractors engaged in energy efficiency during the time that business activities were on pause.<sup>14</sup> BayREN also highlighted its two other Residential sector programs: one for multifamily customers that targets multifamily buildings in disadvantaged communities (DACs) that have less than 100 units; and its Home Energy Score Program which quantifies the value of a home during a real estate transaction.<sup>15</sup> BayREN concluded that these types of programs were what the CPUC had in mind when it approved the REN program mandates.<sup>16</sup>

## Discussion

In its July Ruling, the CPUC acknowledged that PAs face a significantly changed landscape due to COVID-19 and asked PAs to include "accurate and good faith estimates of energy efficiency costs and benefits, as well as budgets, that are necessary to address the current goals and strategies" in their respective program year 2021 ABALs.

Furthermore, Energy Division recognizes that, in its role as a PA and manager of its respective portfolio, BayREN's 2021 Residential sector budget of approximately \$16.8 million is suitable and designed to address the needs of its customers at this time. BayREN's 2021 Residential sector budget is nearly 70 percent of its total 2021 portfolio budget. BayREN's Residential sector budget decreased by \$1.2 million compared to its 2020 Residential sector budget. However, given that BayREN is requesting nearly \$17 million for the sector, we believe the budget is robust enough to help support the recovery of the residential energy efficiency market from the ongoing COVID-19

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<sup>9</sup> Ibid.

<sup>10</sup> Ibid.

<sup>11</sup> See Cal Advocates Protest, p. 9.

<sup>12</sup> See BayREN Response to The Public Advocates Office and Small Business Utility Advocates Protests of Energy Efficiency Annual Budget Advice Letters for Program Year 2021 (September 1, 2020), p 5.

<sup>13</sup> See BayREN Response, p. 3.

<sup>14</sup> Ibid.

<sup>15</sup> See BayREN Response, p. 4.

<sup>16</sup> Ibid.

pandemic. While Cal Advocates argues that the CPUC should require BayREN to reallocate certain non-cost-effective sector-level budgets to the Residential sector, BayREN is the entity best suited to develop a “good faith” 2021 portfolio forecast that addresses competing needs of cost effectiveness and customers and sectors as they are affected by these ongoing challenges.

Consequently, BayREN is not required to file a supplemental ABAL that reallocates budgets from non-Residential sectors to the Residential sector and BayREN’s 2021 budget is approved as filed.

## **2.2. Progress towards cost-effectiveness**

In their protest, Cal Advocates acknowledged that the CPUC does not require that the RENs meet any specific cost-effectiveness threshold. However, they note that the CPUC authorizes ratepayer funds for REN programs with the expectation that they will provide “value (or promise of value) to ratepayers in terms of energy savings and/or market transformation results for energy efficiency”<sup>17</sup> and be managed “with an eye toward long-term cost-effectiveness.”<sup>18</sup> However, Cal Advocates argued that the BayREN’s TRC forecasts and claims over the past several years indicate that it has failed to effectively manage its portfolio with an eye towards long term cost-effectiveness.<sup>19</sup>

In addition, Cal Advocates pointed out that while BayREN’s budget has increased by more than 40% since 2017, its portfolio has come no closer to being cost-effective.<sup>20</sup> Cal Advocates noted that BayREN’s 2021 forecasted TRC ratio of 0.34 is the same as its forecast TRC ratio for 2017, despite millions of ratepayer dollars spent over five years.<sup>21</sup> Cal Advocates added that the CPUC should not approve any of the REN portfolios that devote significant funding to programs with poor cost-effectiveness trajectories.<sup>22</sup>

In response BayREN argued that in D.19-12-021, the CPUC stated that “we do not wish to set a specific cost-effectiveness threshold for the RENs.”<sup>23</sup> BayREN added that this is both because the size of the RENs portfolios is smaller, and because the RENs are inherently designed to take on filing gaps in the other larger portfolios or serve the needs of hard-to-reach (HTR) customer segments that are naturally less cost-effective to serve.<sup>24</sup> BayREN concluded that the RENs must demonstrate new and unique value towards California’s energy, climate and equity goals.<sup>25</sup> It concluded that its ABAL has provided this information as well as the basis for the 2021 budget request and should be approved.<sup>26</sup>

## Discussion

Energy Division shares Cal Advocate’s concern about the low cost-effectiveness of BayREN’s portfolio. However, the RENs are not required to be cost-effective and the rules regarding what

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<sup>17</sup> See D.18-05-041, pp. 95-96.

<sup>18</sup> Ibid.

<sup>19</sup> See Cal Advocates Protest, p. 11.

<sup>20</sup> See Cal Advocates Protest, p. 12.

<sup>21</sup> Ibid.

<sup>22</sup> Ibid.

<sup>23</sup> See BayREN Response pp. 1-2.

<sup>24</sup> See BayREN Response p. 2.

<sup>25</sup> See BayREN Response p. 3.

<sup>26</sup> Ibid.

type of programs that the RENs can run, which include offering programs that are not offered by other PAs and targeting HTR customers, make it nearly impossible for the RENs to design a cost-effective portfolio. D.19-12-021, adopted in December of 2019 reinforced that the RENs would not have to meet a cost-effectiveness threshold. We also note that while the CPUC did state in D.16-08-019 and later decisions “that we encourage the RENs to manage their programs with an eye towards long-term cost-effectiveness”<sup>27</sup>, this is not a criteria for approving ABALs (D.18-05-041, Section 7.3). Thus, we reject Cal Advocates protest.

Finally, in the near term, BayREN must also host a stakeholder workshop, as stated in D. 18-05-041, “...to explain why it failed to meet the approval criteria.” At that workshop, BayREN shall share its budget development process with stakeholders, including how it determines which programs receive specific funding amounts, portfolio cost-effectiveness targets, and how BayREN can deliver more cost-effective savings to improve portfolio cost-effectiveness. BayREN may additionally share its portfolio performance to date, as impacted by COVID-19.

### **2.3. Spending on sectors that have not demonstrated cost-effectiveness improvements over time**

Cal Advocates noted that as proposed, BayREN’s single family program (Home +) would receive an increased budget in 2021 despite a significant decrease in cost-effectiveness – from a 0.37 TRC ratio in 2020 to a 0.12 TRC ratio for 2021.<sup>28</sup> They noted while past forecasted TRC ratios by BayREN show a positive trajectory from 2017 through 2020, claimed TRC ratios have been inconsistent.<sup>29</sup> They concluded that this program fails to demonstrate it would support long-term portfolio cost-effectiveness.<sup>30</sup>

In Table 10 of Cal Advocates protest they recommended a revised budget for BayREN of \$10.8 million down from BayREN’s request of \$24.2 million, which would fully fund the BayREN’s Commercial and Cross Cutting sectors, but would reduce the budget for the Residential sector by 80% from the BayREN request of \$16.8 million to \$3.4 million.<sup>31</sup> Therefore Cal Advocates requested that the CPUC reject BayREN’s ABAL and require the BayREN to refile its ABAL with the reduced spending that Cal Advocates recommends on sectors or programs that have failed to demonstrate cost-effectiveness improvements over time.<sup>32</sup>

In its reply, BayREN noted that it agrees with that Cal Advocates that “[r]esidential ratepayers are in greater need than ever for effective energy efficiency programs that can help alleviate COVID-19 induced financial strain by delivering meaningful energy savings and other benefits.<sup>33</sup> It noted that its Home + program targets low- and middle-income homeowners and renters who are traditionally underserved in energy efficiency programs.<sup>34</sup>

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<sup>27</sup> D.16-08-019, p. 12.

<sup>28</sup> See Cal Advocates Protest, p. 15.

<sup>29</sup> Ibid.

<sup>30</sup> Ibid

<sup>31</sup> See Cal Advocates Protest, p. 16.

<sup>32</sup> See Cal Advocates Protest, p. 17.

<sup>33</sup> See Cal Advocates Protest, p. 9.

<sup>34</sup> See BayREN Response to The Public Advocates Office and Small Business Utility Advocates Protests of Energy Efficiency Annual Budget Advice Letters for Program Year 2021 (September 1, 2020), p. 5.

BayREN added that in addition to energy savings, this program also promotes the health benefits of energy retrofits, something of even greater concern during this pandemic.<sup>35</sup> During the COVID-19 pandemic, BayREN has expanded its contractor offerings by providing trainings, professional development and other activities to keep contractors engaged in energy efficiency during the time that business activities were on pause.<sup>36</sup> BayREN also highlighted its two other Residential sector programs for multifamily customers that targets DACs that have less than 100 units and its Home Energy Score program which quantifies the value of a home during a real estate transaction.<sup>37</sup> BayREN concluded that these types of programs were what the CPUC had in mind when it approved the REN program mandates.<sup>38</sup> BayREN concluded that an 80% reduction in the residential budget would result in the closing of these programs, laying off implementors, and would reduce the number of participating contractors enrolled in the program that have already been hit hard by the pandemic.<sup>39</sup> BayREN concluded that its Residential sector budget request is appropriate, and Cal Advocates arbitrary reduction should be rejected.<sup>40</sup>

## Discussion

While Cal Advocates argues that the CPUC should require BayREN dramatically reduce the budget for this program, Energy Division believes that BayREN is the entity best suited to develop a “good faith” 2021 portfolio forecast that addresses the competing needs of their HTR customers while also working towards becoming more cost-effective. Finally, we note that this request by Cal Advocates is out of scope of the review criteria that the CPUC adopted in D.18-05-041, Section 7.3 on the “Criteria for Approving Annual Budget Advice Letters”, which states: “Standard of review for staff disposition of the ABALs does not include review of program administrators' decisions on reducing, cancelling, expanding or adding individual programs or program areas.”<sup>41</sup> Consequently, BayREN is not required to refile its ABAL with any reduced spending on programs as requested by Cal Advocates.

### **2.4. Standardized Accounting for Unspent and Uncommitted Funds**

In its protest, Cal Advocates argued that the CPUC should require PAs to file a supplemental ABAL to standardize accounting and reporting of unspent and uncommitted funds and use of ABAL templates. Cal Advocates pointed specifically to discrepancies in Pacific Gas and Electric (PG&E), San Diego Gas & Electric (SDG&E), Southern California Edison (SCE) and Southern California Gas (SoCalGas) approach in completing Table 3a of ABAL Appendix.

## Discussion

In a review of Table 3a and Table 9 in Appendix that accompanies BayREN’s PY 2021 ABAL, Energy Division found that BayREN did not originally adhere to current accounting and reporting practices in Table 9 as they relate to unspent and uncommitted funds. This was communicated to

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<sup>35</sup> See BayREN Response, p. 3.

<sup>36</sup> Ibid.

<sup>37</sup> See BayREN Response, p. 4.

<sup>38</sup> Ibid.

<sup>39</sup> Ibid.

<sup>40</sup> Ibid.

<sup>41</sup> See D.118-05-041, p. 134



BayREN and it subsequently corrected Table 9 and applied its unspent and uncommitted funds to its 2021 cost-recovery request in its supplemental ABAL 16-E-A. Thus, BayREN is not required to file any additional supplemental to ABAL 16-E-A.

### **3. SBUA Protest and BayREN's Reply Comments**

SBUA's protest raised eight issues, four of which are specific to BayREN's 2021 ABAL:

- IOUs have to collaborate with RENs to ensure the needs of small business customers are being met;
- PAs should breakdown data by customer subclasses;
- Low TRC values for RENs should not be held against them; and
- COVID-19's impacts support additional funding for small business programs and Commission guidance on cost-effectiveness review.

#### **3.1. IOU collaboration with RENs**

SBUA stated that the purpose of the RENs is to serve all HTR customers and that the RENs have the ability to leverage local partnerships to serve these customers that the IOUs have struggled to serve.<sup>42</sup> However, SBUA claimed that this does not mean that the responsibility to ensure HTR customers are being served lands entirely on the RENs.<sup>43</sup> Thus, SBUA stated that BayREN has to collaborate with PG&E to ensure that there are programs targeting commercial HTR customers.<sup>44</sup> SBUA recommended that Energy Division require the IOUs and RENs to comply with D.18-05-041 by refileing their respective Advice Letters with an analysis and plans that demonstrate coordination and effective plans to serve commercial HTR customers.<sup>45</sup>

BayREN did not respond to this protest by SBUA, however PG&E and the IOUs did. PG&E's reply asks that the CPUC reject SBUA's request. PG&E referred to the Joint Cooperation Memos (JCMs), which are filed annually by each PA (except SDG&E), per CPUC guidance. JCMs describe the exact coordination activities between IOU PA and the RENs that SBUA requests in its protest. PG&E asks that PA coordination not be duplicated in the ABAL process.<sup>46</sup>

#### Discussion

PG&E is correct when it describes the annual JCM as the primary source for information that SBUA asks for in its protest. These memos are filed annually by each PA (except SDG&E), and describe the means by which each entity will cooperate and coordinate in the coming year to ensure that ratepayer funds are providing the best service possible to the ratepayers in their respective overlapping territories. Consequently, BayREN is not required to file a supplemental ABAL that describes cooperation between it and the REN, as this would be duplicative of the JCM process.

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<sup>42</sup> See SBUA Protest, p. 3.

<sup>43</sup> Ibid.

<sup>44</sup> Ibid.

<sup>45</sup> See SBUA Protest, p. 4.

<sup>46</sup> See PG&E Reply, p. 6.

### 3.2. Customer Sub-class Data

In its protest, SBUA described how PA report on funding requests, savings, etc., by general customer class, including residential, commercial, industrial, and agricultural. SBUA asked the CPUC to require PAs to break down data for residential and commercial customers into subgroups:

- res-single-family;
- res-multi-family;
- small commercial;
- medium; and,
- large commercial.

In addition, SBUA recommended that the PAs should adopt SDG&E’s approach and present information on rate impacts for each customer sub-class, which SBUA argues would improve stakeholder and CPUC staff understanding of whether and how PA program activities are targeting customer classes that face significant participation barriers.<sup>47</sup>

#### Discussion

Energy Division notes that the ABAL process, which is explicitly envisioned as a “ministerial,”<sup>48</sup> sector-level budget recovery request exercise tied to review criteria laid out in D.18-05-041, is not the proper forum for issues related to PA data collection and reporting. Consequently, BayREN is not required to break down customer data by sub-class as part of the ABAL review. Instead, Energy Division will work with stakeholders and the PAs to determine the most feasible manner in which this revised data reporting provision may be achieved.

### 3.3. Low TRC values for RENs

SBUA noted that in 2020, BayREN experienced a drop in its TRC values. It noted that while the RENs describe how they plan to increase its TRC scores in its ABALs. SBUA believes that leeway is warranted for the RENs as TRC scores may not increase in the next year due to the ongoing global pandemic and the high number of catastrophic wildfires impacting customers statewide.<sup>49</sup>

#### Discussion

Energy Division agrees with SBUA and notes that the CPUC has never required that the RENs be cost-effective.

### 3.4. COVID-19’s impacts and support for small business programs and CPUC guidance on cost-effectiveness review

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<sup>47</sup> See SBUA Protest, pp. 7-8.

<sup>48</sup> See D. 15-10-028, p. 60

<sup>49</sup> See SBUA Protest, p. 9.



SBUA noted that it agrees with BayREN that the small and medium business market has been among the hardest hit economically.<sup>50</sup> SBUA noted that BayREN indicates that if data and trends support an increased incentive for its Commercial Pay-for-Performance Program than it will develop an alternative incentive level in 2021.<sup>51</sup> However, SBUA requested that Energy Division should set a firm date by when BayREN has to propose a revised incentive structure.<sup>52</sup> SBUA proposed that BayREN submit a revised incentive structure by December 1, 2020.

In response BayREN claimed that SBUA's request that the Energy Division set a firm date for BayREN to provide a new incentive schedule for its commercial program should be disregarded since PAs are already required to submit revised Implementation Plans when there are substantive changes to a program.<sup>53</sup> As detailed in its ABAL – and supported by SBUA in its protest – small businesses have been devastated by COVID-19 impacts and many remain shuttered. While the increased incentive matrix for Program Year 2021 is to be determined in the immediate future, BayREN argued that the incentive level is not significant for the ABAL, since there will be no change to the program budget, i.e. the incentives, marketing, admin and implementation budgets will not change, nor will the total projected energy savings.<sup>54</sup> Accordingly, there is no reason for the ABAL to be supplemented.<sup>55</sup>

## Discussion

We agree with BayREN that the appropriate place for them to update any incentive structure for its Commercial Pay-for-Performance Program would be through its Implementation Plans. Finally, we note that this request by SBUA is out of scope of the ABAL review criteria that the CPUC adopted in D.18-05-041, Section 7.3 on the “Criteria for Approving Annual Budget Advice Letters,” which states: “Standard of review for staff disposition of the ABALs does not include review of program administrators' decisions on reducing, cancelling, expanding or adding individual programs or program areas.”<sup>56</sup> Consequently, we reject the protest SBUA, and BayREN is not required to submit a revised incentive structure by December 1, 2020.

Please direct any questions regarding Energy Division's findings in this non-standard disposition to Nils Strindberg ([nils.strindberg@cpuc.ca.gov](mailto:nils.strindberg@cpuc.ca.gov))

Sincerely,

Handwritten signature of Edward Randolph in black ink, with the initials "(F01)" written in parentheses to the right of the signature.

Edward Randolph  
Deputy Executive Director for Energy and Climate Policy/

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<sup>50</sup> See SBUA Protest, p. 8.

<sup>51</sup> Ibid.

<sup>52</sup> Ibid.

<sup>53</sup> See BayREN Response, p. 5.

<sup>54</sup> Ibid.

<sup>55</sup> Ibid.

<sup>56</sup> See D.18-05-041, p. 134

Director, Energy Division

Cc: Service Lists R. 13-11-005 and A.17-01-013

Pete Skala, Energy Division

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