

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

Application of Pacific Gas and Electric Company for Approval of the 2009-2011 Low Income Energy Efficiency and California Alternate Rates for Energy Programs and Budget (U 39 M)	Application 08-05-022 (Filed May 15, 2008)
Application of San Diego Gas & Electric Company (U 902 M) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009 – 2011	Application 08-05-024 (Filed May 15, 2008)
Application of Southern California Gas Company (U 904 G) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009 – 2011	Application 08-05-025 (Filed May 15, 2008)
Application of Southern California Edison Company (U 338-E) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009, 2010, and 2011	Application 08-05-026 (Filed May 15, 2008)

**SEVENTH ANNUAL REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
ON THE RESULTS OF ITS 2010 FAMILY ELECTRIC RATE ASSISTANCE PROGRAM
EFFORTS IN COMPLIANCE WITH ADVICE LETTER 2498-E-A**

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Dated: May 2, 2011

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ON THE RESULTS OF ITS 2010 FAMILY ELECTRIC RATE ASSISTANCE PROGRAM
EFFORTS IN COMPLIANCE WITH ADVICE LETTER 2498-E-A**

Pacific Gas and Electric Company (PG&E) files its Seventh Annual Progress Report on its 2010 Family Electric Rate Assistance (FERA) Program efforts in compliance with the FERA reporting requirements developed jointly by the utilities, DRA, Energy Division, Latino Issues Forum, and TURN as set forth in PG&E's Advice Letter 2498-E-A, which became effective June 17, 2004. This advice letter was a requirement of Decision 04-02-057, mimeo, page 58, and Ordering Paragraph 5.

Respectfully submitted,

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May 2, 2011

**SEVENTH ANNUAL PROGRESS REPORT TO THE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**FAMILY ELECTRIC RATE ASSISTANCE
(FERA)**

JANUARY 1, 2010 - DECEMBER 31, 2010

May 2, 2011

**PACIFIC GAS AND ELECTRIC COMPANY
FERA PROGRAM
MAIL CODE B5K
PO Box 770000
SAN FRANCISCO, CA 94177**

TABLE OF CONTENTS

FERA PROGRAM

I.	PARTICIPANT INFORMATION	1
II.	PROGRAM COSTS	4
III.	OUTREACH.....	8
IV.	PROCESSING FERA APPLICATIONS	12
V.	PROGRAM MANAGEMENT.....	13

FAMILY ELECTRIC RATE ASSISTANCE (FERA)

I. PARTICIPANT INFORMATION

A. Provide the total number of FERA customers by month, for the reporting period.

See Table 1.

Table 1		
2010	FERA Enrolled¹	FERA Receiving Tier 3 Benefit¹
January	24,339	15,346
February	25,159	14,075
March	25,567	15,021
April	25,628	14,462
May	25,310	14,958
June	25,236	13,920
July	25,293	16,866
August	25,639	16,981
September	25,862	16,863
October	26,198	15,896
November	26,190	15,624
December	26,115	17,498

Notes:

¹ Does not include sub-metered tenants.

B. Provide the total number of FERA-eligible households, FERA-participating households, and FERA household penetration rates by quarter.

See Table 2.

Table 2			
FERA Penetration Rate			
2010 Quarter Ending	FERA-Eligible Households¹	FERA-Participating Households¹	FERA Household Penetration Rate²
March 31	174,074	25,567	15%
June 30	174,074	25,236	14%
September 30	174,074	25,862	15%
December 31	174,074	26,115	15%

Notes:

¹Does not include sub-metered tenants.

²FERA Household Penetration Rate is calculated by dividing FERA Participating Households by FERA-Eligible Households.

C. Discuss how the estimates of current FERA-eligible households were developed.

For the 2010 program year reporting period, PG&E used the same Joint Utilities' methodology for calculating demographic FERA-eligibility rates that was adopted for California Alternate Rates for Energy (CARE) in 2001 in Decision (D.) 01-03-028. The particulars of the calculations may be found in Attachment A, "Technical Addendum: Joint-Utility Methodology for Calculating CARE Penetration" excerpted from the Joint Utilities' "Reporting Requirements Manual (RRM) Working Group Report for Low Income Assistance Programs" (R.98-07-037) and Attachment B, the Joint Utility CARE eligibility update (filed on October 15, 2008 in compliance with the directives of D.02-07-033, Ordering Paragraph 4(b), as modified by the Assigned Commissioner's Ruling (ACR) of December 27, 2002 and the Scoping Memorandum of June 24, 2004).¹ In summary, PG&E applies county-based commodity-specific demographic eligibility multipliers to the technically eligible meter count within that county. The product of this calculation is then added together to obtain an overall eligibility for each commodity served.

The estimates of FERA-demographically eligible households were calculated for each utility by applying the demographic eligibility rate to technically eligible households by county and utility service area. The methodology is described in

¹ The Joint Utilities are PG&E, Southern California Edison Company, San Diego Gas and Electric Company and Southern California Gas Company. Energy Division and the Division of Ratepayer Advocates also participate in the RRM Working Group.

the Low Income Reporting Requirements Manual. These rates were developed by Athens Research and utilize current year income and household size data. The 2010 penetration rates reported in low income monthly reports used demographic eligibility rates that were submitted to the Commission on December 2009.

PG&E applied the demographic eligibility rate supplied by the Joint Utility demographer to internally derive the demographically eligible household count by county and commodity. To derive the demographic information, the Joint Utilities hired a demographic consultant, Athens Research, which culled information starting with the current census tract data available for PG&E's service area. Additionally, commercially available demographic updates were utilized to update the population information for the current year. The Joint Utility demographer then developed matrices, applying appropriate statistical methods in order to properly represent the information by county and commodity. The raw percentage of estimated eligible population, by county and fuel type, was then provided to PG&E for combining with the technically eligible meter counts. The product of these statistics results in PG&E's estimated eligible population.

D. Provide the current FERA sub-metered tenant counts at year-end.

135 sub-metered tenants were enrolled in FERA at year-end.

E. Discuss any problems encountered during the reporting period administering FERA for sub-metered tenants and/or master-meter customers.

Since FERA was created in June 2004, the main problems encountered by sub-metered tenants and/or master-metered customers include understanding the FERA discount on their bills, understanding the difference between the FERA discount and the CARE discount, and understanding whether or not they can apply for both discounts.

PG&E provided a FERA certification report to landlords/managers at regular intervals. PG&E also requested landlords/managers to contact PG&E when information needed to be updated. Nonetheless, some landlords/managers still failed to notify PG&E when a FERA-certified tenant moved out of the facility.

During the economic downturn, PG&E noticed a higher than normal increases of turn over within Mobile Home Park ownership and management. When change of ownership happened, PG&E worked with new owners to transfer existing FERA-certified tenants' data to new accounts and informed them about the FERA program and the processes involved. When landlords changed managers, they often failed to notify PG&E with new contact information, which resulted in undelivered reports and delayed communication.

II. PROGRAM COSTS

A. Discount Cost

1. State the average monthly FERA discount received, in dollars per FERA customer.^{1,2}

The average monthly FERA discount in 2010, per FERA customer, was \$33.41.

Notes:

¹Does not include sub-metered tenants.

² Enrolled customers are excluded from the monthly average during any months they did not reach Tier 3 usage.

2. State the cumulative annual discount for all FERA customers.¹

The 2010 annual FERA discount was \$6,324,300.

The 2004 through 2010 cumulative annual discount was \$16,228,476.

Notes:

¹Does not include sub-metered tenants.

B. Administrative Cost

1. Show the FERA Program's administrative cost by category.

See Table 3.

Table 3	
FERA Program Administrative Costs by Category and Benefits	
Category	Cost
Outreach	\$31,846
Processing, Certification, and Verification	\$110,029
General Administration	\$55,006
Billing System / Programming	\$19,850
Regulatory Compliance	\$1,834
Energy Division Staff Funding	\$0
TOTAL PROGRAM COSTS	\$218,565
CUSTOMER BENEFITS	\$6,324,300
TOTAL PROGRAM COSTS & CUSTOMER BENEFITS	\$6,542,865

2. Explain what is included in each administrative cost category.

Outreach: This category includes bill inserts, applications (printing and mailing), postage, sub-metered outreach, information technology (technical support and software licensing), staff labor, event staffing, website design, and other outreach.

Processing, Certification and Verification: This category includes staff labor for application processing, certification, recertification, verification and training.

General Administration: This category includes office supplies, program management labor and information technology (technical support and software licensing).

Billing System / Programming: This category includes manual rebilling, programming and billing labor.

Regulatory Compliance: This category includes program applications and advice filings, comments and reply comments, hearings, reports and studies, working group meetings, public input meetings, and tariff revisions.

CPUC Energy Division Staff Funding: This category includes funding for the Energy Division staff.

Customer Benefits: This category includes rate discounts.

3. Explain how costs of joint CARE/FERA activities are charged to each program.

For joint CARE/FERA activities, PG&E charged the expenses to appropriate CARE/FERA order numbers depending on the nature of the activities and the number of hours spent on each program.

C. Provide the year-end December 31 balances for the FERA balancing account for both the current and prior reporting periods.

The year-end December 31, 2010 balance for the FERA balancing account was a debit of \$6,671,717

The year-end December 31, 2009 balance for the FERA balancing account was a debit of \$4,643,804

The year-end December 31, 2008 balance for the FERA balancing account was a debit of \$2,566,392

The year-end December 31, 2007 balance for the FERA balancing account was a debit of \$1,603,094.

The year-end December 31, 2006 balance for the FERA balancing account was a debit of \$1,658,767.

The year-end December 31, 2005 balance for the FERA balancing account was a debit of \$1,340,372.¹

The year-end December 31, 2004 balance for the FERA balancing account was a debit of \$340,948.

Notes:

¹ The figures were adjusted and different from the 2005 Annual Report.

III. OUTREACH

A. Discuss utility outreach activities and those undertaken by third parties on the utility's behalf.

Consistent with the provisions of D.04-02-057 that, "[A]dditional outreach should be undertaken when it can be done at little cost" (mimeo, p. 56), outreach for FERA is coordinated with PG&E's CARE and Low Income Energy Efficiency ("LIEE," also known as "Energy Partners") outreach efforts.

Following are outreach initiatives undertaken by CARE at no additional cost or little cost to FERA program.

Automated Phone Enrollment

The phone enrollment initiative continued to be vital in the program's outreach efforts by providing a quick and efficient way to reach income-qualified customers via automated outbound phone calls. Working with a third-party vendor, PG&E utilized Automated Voice Messaging (AVM) technology, allowing customers to verify their eligibility and enroll in the program via a touchtone phone.

Bill Inserts

A bill insert consisting of a postage-paid bilingual application in English and Spanish was mailed in the March, June and August billing cycles. This initiative was an efficient outreach tool because of its ability to reach every residential PG&E customer who was not already on FERA.

Community Events

One of the most effective ways to break down barriers, engage community leaders, and build trust in communities is through community events. PG&E participated in 130 multicultural events, bringing a face and personality to the FERA program. These events provided an opportunity for program staff to distribute collateral materials, hold face-to-face conversations with customers and network with organizations with similar goals. In many cases, staff members assisted customers in applying on-site via paper or an online application.

Direct Mails

Direct mail continued to be the most successful outreach method in 2010. Bilingual applications were mailed to customers' homes, thereby reducing barriers to accessibility of enrollment information. Those direct mail initiatives included:

- Direct mail to customers residing at addresses of recently-closed CARE accounts
- Direct mail to customers who had received a 15-day notice within the past year.
- Direct mail to customers utilizing data from PG&E's customer information system. The list included customers who were on Medical Baseline or receiving life support, customers who had received a 48-hour notice within the past year, and customers who were required to submit a credit deposit within the past year.
- Direct mail to customers who had previously requested an application but did not mail it in or complete the enrollment process
- Monthly direct mail piece to customers who were removed from CARE due to failure to recertify, asking them to re-apply for the program if they still qualified.
- Direct mail to customers utilizing data provided by a data source company. Customer segment included African American, Chinese, Vietnamese, Hispanic, senior, veteran, and general audience.
- Direct mail to customers on the Third Party Notification Program, which allows a customer to designate a friend or relative to receive duplicate copies of past-due payment notices.
- Direct mail to customers in specific zip codes with the highest percentages of CARE-eligible and un-enrolled customers.

Integration

FERA integrated with CARE, Cooling Centers and Energy Savings Assistance program (PG&E's LIEE program), in order to generate FERA enrollment. FERA applications were on display and available to participants at Cooling Centers that partnered with PG&E. FERA information and applications were distributed at various CARE and Energy Partners outreach events. Also, CARE Community Outreach Contractors (COCs) assisted in enrolling FERA customers at no additional cost. In addition, CARE customers who notified PG&E of a change in income status which no longer qualified them for CARE were then informed about FERA and provided with an opportunity to apply if qualified. Additionally, customers that applied for CARE, but were income-qualified for FERA, were automatically enrolled in the FERA Program.

Kiosks

Through the Local Office initiative, ADA-compliant self-service kiosks have been installed to create an easy-to-use touch point for customers to apply for FERA. The kiosks help raise awareness and generate new enrollments while providing a convenient way for customers to fill out an application. In addition to

the kiosks, local office customer service representatives have been trained to speak about the program benefits with every customer.

These kiosks include an application holder as well as a slot where the customer can deposit the completed application. Each kiosk comes with a lock and key in order to help maintain security and confidentiality and gives customers the opportunity to enroll themselves while waiting in line to pay their bills. The local office staff replenishes the supply of applications in the kiosk and mails completed applications to the FERA program on a regular basis.

Online Enrollment

PG&E continued to utilize its website to promote the FERA program. Each application was posted in-language and in a format that allowed easy downloading and printing. Detailed information about the program was provided and links to other assistance programs were made available.

With the online application available in English, Spanish and Chinese on PG&E's website, customers enrolled online using one of two options: completion of a simple form which requires no registration or via "My Account", which requires registration. Customers were able to complete the necessary household and income eligibility information, accept the declaration which states the information they provided is true, and submit the application electronically

PG&E launched an eBill campaign which consisted of an e-mail to targeted eBill customers, with a link to apply via their online account.

PG&E also utilized an online mailbox – CAREandFERA@pge.com – as an internal and external communication tool for any program-related inquiries.

Senior and Disabled Outreach

FERA continued its outreach to seniors and those with disabilities. With respect to the challenges associated with financial assistance programs, seniors and those with disabilities may be overwhelmed with the steps involved in completing the application. FERA focused attention on this customer population and utilized large-print applications in multiple languages and participated in targeted outreach events for face-to-face interactions.

Sub-Metered

PG&E reached out to sub-metered tenants by mailing enrollment packets to sub-metered facility managers across its service area. The packets informed the managers about the FERA benefits and encouraged them to distribute applications to their tenants.

B. Discuss each of the following:

1. How FERA customer data and other relevant program information is shared within the utility, for example, between LIEE and other appropriate low-income programs.

The FERA discount is recorded directly into the customer information system. This allows Customer Service Representatives (CSRs) to see the FERA status of any customer calling PG&E's contact center for assistance. This provides important information for the CSR to use when discussing other benefits and services that may be of assistance to the income-qualified customer.

FERA features other financial assistance information on its applications. Each 8.5" x 11" application provides a brief description of other assistance programs available as well as contact numbers.

2. Discuss barriers to participation encountered during the reporting period and steps taken to mitigate them.

With the increasing awareness of energy efficiency, many FERA income-qualified households with electric usage below Tier 3 (131 – 200 percent of baseline) were not interested in applying for the FERA discount since they would not benefit from it. The FERA Program commended customers on their energy conservation efforts but encouraged them to apply for FERA anyway, in preparation for any unforeseen future energy usage increase.

IV. PROCESSING FERA APPLICATIONS

A. Processing Self-Certification and Self-Recertification Applications (individual and sub-metered customers)

1. Provide the number of utility and third-party FERA self-certification and self-recertification applications provided, received, approved, denied, pending/never completed, or duplicates for the reporting period.

See Table 4.

TABLE 4						
FERA Self-Certification and Self-Recertification Applications ¹						
	Provided ²	Received	Approved	Denied	Pending/Never Completed	Duplicates
Utility	19,163	14,319	14,097	158	64	2,290
Capitation	0	0	0	0	0	0
Other Third-Party	0	0	0	0	0	0
Total	19,163	14,319	14,097	158	64	2,290

Notes:

¹Includes sub-metered tenants.

²Excludes CARE/FERA outreach applications and multiple bill inserts.

B. Processing Random Post-Enrollment Verification Requests

1. Provide the total number of verifications requested, received, approved, denied, pending/never completed, or duplicates, for the reporting period.

See Table 5.

TABLE 5						
FERA Random Post-Enrollment Verification Requests ¹						
	Requested	Received	Approved ²	Denied	Pending/Never Completed	Duplicates
Total			659			

Notes:

¹ Random Post-Enrollment Verification was not conducted specifically for FERA in 2010 due to the small number of enrollments and discounts.

² 659 CARE Post-Enrollment Verification requests were approved for FERA in 2010.

V. PROGRAM MANAGEMENT

A. Discuss issues and/or events that significantly affected program management in the reporting period and how these were addressed.

FERA did not have a budget. The program was administrated incrementally to the CARE program which allowed FERA to outreach to customers at no additional or little cost. As a result, FERA enrollment increased from 14 percent to 15 percent in 2010.

In an ongoing effort to protect the environment and reduce printing and mailing costs, PG&E encouraged residential customers to utilize our website and apply online. PG&E also encouraged sub-metered facility landlords/managers to sign-up to receive their monthly FERA certification reports via e-mail. Many facilities had requested receipt of their reports electronically.

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 May 2, 2011, I served a true copy of:

**SEVENTH ANNUAL REPORT OF PACIFIC GAS AND ELECTRIC COMPANY (U 39
E) ON THE RESULTS OF ITS 2010 FAMILY ELECTRIC RATE ASSISTANCE
PROGRAM EFFORTS IN COMPLIANCE WITH ADVICE LETTER 2498-E-A**

- [XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service lists for A.08-05-022, et al., 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 lists for A.08-05-022, et al., 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 2nd day of May 2011, at San Francisco, California.

/s/

TAUVELA U’U

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

EMAIL SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022; -024; -025; -026

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: April 20, 2011

CPUC DOCKET NO. A0805022-A0805024-A0805025-A0805026

Total number of addressees: 203

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