

DOCKETED	
Docket Number:	23-LMS-01
Project Title:	Load Management Standards Implementation
TN #:	266039
Document Title:	3CE Revised Load Management Standards Plan
Description:	Central Coast Community Energy Revised Load Management Standards Plan
Filer:	Jessica Melms
Organization:	Braun Blaising & Wynne P.C.
Submitter Role:	Applicant Representative
Submission Date:	9/17/2025 10:19:47 AM
Docketed Date:	9/17/2025



September 17, 2025

Mr. Drew Bohan
Executive Director
Energy Data and Analytics Office
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

RE: Submission of 3CE's Revised Load Management Standards Plan to the CEC Executive Director

Dear Mr. Bohan:

In accordance with Section 1623.1(a)(3)(B) of the California Energy Commission's Load Management Standards (LMS), Central Coast Community Energy ("3CE") submits its Revised LMS Plan to the CEC's Docket Number 23-LMS-01.

The 3CE Policy Board of Directors ("Board") adopted 3CE's original LMS Plan in a duly noticed meeting on February 21, 2024. At that time, the Board authorized 3CE's Chief Executive Officer ("CEO"), Robert Shaw, to approve submission of subsequent updates as required. 3CE submitted its original LMS Plan to this docket on March 7, 2024. In response to your June 19, 2025 letter requesting revisions to 3CE's LMS Plan, 3CE's CEO has approved the following updates.

The plan was revised to reflect recent activity by 3CE to advance load flexibility:

- Offering and enrollment update of CalFUSE dynamic rate pilots approved by the California Public Utilities Commission; and
- Participation in the development and submission of a joint LSE proposed plan for the statewide standard RIN tool; and
- General updates to formatting, corrections to compliance references, 3CE's service area description, expanded discussion of the CEC Review Process and dynamic pricing promotion.

Enclosed is 3CE's Revised LMS Plan for the CEC's final approval. If you have any questions, or additional information is required, please contact me at (831) 641-7220 or at JStrickland@3CE.org.

Sincerely,

Jerri Strickland
Director of Regulatory Affairs & Compliance
JStrickland@3CE.org

Load Management Standards

CENTRAL COAST COMMUNITY ENERGY

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Introduction

This plan highlights how Central Coast Community Energy's (3CE) Boards' decisions align with the California Energy Commission (CEC) goals by meeting or exceeding the timeline of their Load Management Standards (LMS). The strategies outlined in this plan are to be evaluated and implemented by 3CE staff at our board's direction.

About 3CE

Central Coast Community Energy (3CE) is a public agency that sources competitively-priced electricity from clean and renewable energy resources. Through its dedicated Boards and professional staff, 3CE is committed to reducing greenhouse gas emissions by accelerating the transition to 100% clean and renewable energy, while maintaining competitive rates. 3CE is committed to addressing the effects of climate change by investing in the development of a renewable and reliable grid that supports the electrification of sectors such as transportation, agriculture, and buildings—and incentivizing that change through innovative and impactful energy programs.

3CE is an A-credit rated public electric generation provider comprised of 35 municipal jurisdictions across five counties. 3CE currently serves over 1.2 million people through nearly 550,000 customer accounts representing approximately 94% of the region's electricity load. 3CE promotes long-term electric rate stability and energy security while reducing reliance on fossil fuels and stimulating our local economies.

3CE's Boards

3CE's Policy and Operations Boards, comprising 19 seats each, represent 35 member agencies. The Policy Board directs the strategic vision, budget, rates, and major non-power-procurement capital expenses, while the Operations Board oversees contracts and policies to ensure effective administration.

3CE's Boards are actively engaged in responsible fulfillment of state climate policies, resulting in:

1. **Procurement Strategy:** Commitment to serving 100% of retail sales with incremental clean and renewable energy by 2030, with a stretch goal of balancing monthly.
2. **Resource Adequacy Hedging:** Support for a structured approach ensuring system reliability through various measures, including investment in energy storage, baseload renewable energy technologies, and demand response.
3. **Ratemaking Discretion:** Utilizing the Policy Board's ratemaking discretion to adopt rates based on the cost to serve customers, supporting competitive and stable generation rates in line with state climate policies.
4. **Local and Targeted Hire Procurement Policy:** Establishment of a policy to prioritize local and targeted hiring in procurement processes.

The CEC's Load Management Standards

The Warren-Alquist Act of 1974 established the CEC and granted the CEC specific authority, including the ability to review and approve the siting of power plants, set efficiency standards for buildings and appliances, and establish load management standards. In 2022, the LMS underwent updates with amendments aimed at enhancing statewide demand flexibility in order to support

California's climate policies and the aggressive adoption of renewable energy generation technologies.¹ These revised standards are applicable to major entities such as large investor-owned utilities, large publicly owned utilities, and twelve large Community Choice Aggregators (CCAs), like 3CE, providing over 700 GWh of electricity annually.

One important factor identified by the LMS in supporting demand flexibility and the state's climate policies is the principle of marginal-cost based rates. Marginal-cost based rates, commonly linked to the wholesale price of electricity, are determined by factors like fuel costs, operational expenses, and the total demand for electricity at a specific time. These rates fluctuate during the day, adapting to shifts in demand and the accessibility of diverse energy sources.

The CEC's primary objectives of the Load Management Standards encompass:

1. Ensuring the accuracy of existing and future time-varying rates in the Market Informed Demand Automation Server (MIDAS) rate database, which is publicly accessible and machine-readable.
2. Developing a standard rate information access tool to support third-party Demand Response and Load Management services.
3. Creating and submitting location marginal price-based rates that change at least hourly to reflect marginal wholesale costs.
4. Integrating information about new time-varying rates and automation technologies into existing customer education and outreach programs.²

To do this, the LMS outlines different goals and timelines for the large CCAs, publicly owned utilities (POUs) and investor-owned utilities (IOUs) to meet all four of the primary objectives. A notable difference for CCAs is that the LMS allows CCAs to either create their own rates or programs *or participate in already existing IOU programs and rate offerings, with their governing board's approval*. The following sections of this document elaborate how 3CE is implementing the plan to meet or surpass these objectives, outlining the board-approved plan concerning the main goals and other goals stipulated by the CEC Load Management Standards.

CEC Review Process

Title 20 of the California Code of Regulations §1623.1(a)(3) establishes a process for the CEC Executive Director to review individual LMS plans and make requests to LSEs for changes or updates. The review of 3CE's Board Adopted Load Management Standards Compliance Plan, filed March 7, 2024, was found to be reasonable and supported by objective data and other information, but the Executive Director requested 3CE update its plan to incorporate its participation in California Public Utility Commission (CPUC) approved dynamic rate pilots, which were still in development at the time the plan was docketed, and to include a statement that addresses the statewide RIN tool into its revision. On September 17, 2025, 3CE submitted its updated LMS Plan to incorporate the recommended changes and requested information for compliance with 20 CCR §1623.1(a)(1) and §1623.1(a)(2).

¹ California Energy Commission. "Load Management Fact Sheet." Accessed February 2024.
https://www.energy.ca.gov/sites/default/files/2022-10/Load_Management_Fact_Sheet_ADA.pdf

² California Energy Commission. "Load Management Standards." Accessed February 2024.
<https://www.energy.ca.gov/programs-and-topics/topics/load-flexibility/load-management-standards>

Table 1: LMS Standards and Goal Date

Load Management Standard	Description	LMS Goal Date	Status
§1623.1(c)	Within three months of LMS effective date, upload existing time-dependent rates to the MIDAS database	1-Jul-23	Achieved (Ahead of goal date.)
§1623.1(a)(1)	Within one year of LMS effective date, develop and submit a plan addressing how 3CE intends to meet the objectives of the CEC LMS, including the evaluation of marginal cost-based rates and programs, to 3CE's Board. The plan must be considered for adoption within 60 days after submission.	1-Apr-24	Achieved (Ahead of goal date.)
§1623.1(a)(3)(A)	Submit a plan to CEC within 30 days of adoption of the plan. Respond to requests for additional information and/or recommendations within 90 days.	30 days after 3CE board vote	Achieved
§1623(c)	Within one year of LMS effective date, provide customers access to their Rate Identification Numbers (RIN) on billing statements and in online accounts using both text and QR code.	1-Apr-24	Achieved
§1623(c)	Within 18 months of LMS effective date, develop and submit to the CEC, in conjunction with the other obligated utilities, a single statewide standard tool for authorized rate data access by third parties, and the terms and conditions for using the tool. Upon CEC approval, maintain and implement the tool.	1-Oct-24	Achieved
§1623.1(b)(3)	Within 18 months of LMS effective date, submit to the CEC a list of load flexibility programs deemed cost effective by 3CE. The portfolio of programs must provide at least one option to automate response to MIDAS signals for each customer class where 3CE's Board has determined such a program would materially reduce peak demand.	1-Oct-24	In progress

§1623.1(a)(3)(C)	Submit annual reports to the CEC demonstrating implementation of plan, as approved by the Board	Annually	Ongoing
§1623.1(b)(2)	Within twenty-seven months of the LMS effective date, submit at least one marginal cost-based rate or program to Board for approval for any customer class(es) where such a rate will materially reduce peak load. An Information copy of the tariff applications will be provided to the CEC.	1-Jul-25	In progress
§1623.1(b)(4)	Within fifty-one months of the LMS effective date, offer each customer voluntary participation in either a marginal cost-based rate, if approved by the Board, or a cost-effective load flexibility program.	1-Jul-27	In progress
§1623.1(b)(5)	Conduct a public information program to inform and educate affected customers why marginal cost-based rates or load flexibility programs and automation are needed, how they will be used, and how these rates and programs can save customers money.	No Goal Date Specified	Ongoing
§1623.1(a)(1)(C)	Review the plan at least once every 3 years after the plan is adopted and submit a plan update to the Board if there is a material change.	Triennially	Ongoing

3CE's Plan for Marginal Rate Development

Rate Design & Deployment

CCA governing boards have jurisdictional control over rate setting on behalf of their customers. Public Utilities Code Section 366.2(c)(3) provides that that CCAs retain jurisdiction for setting rates for the electricity they purchase on behalf of their communities. This local control empowers CCAs to tailor energy programs, determine pricing structures, and prioritize renewable energy sources according to the preferences and goals of the communities they serve.

3CE sets rates locally through a transparent process involving community stakeholders and board members representing each community 3CE serves. Local rate-setting reflects our region's coastal and inland climates, the unique energy needs of our diverse Central Coast community and allows for input from customers and communities served.

3CE also conducts rigorous data driven analysis prior to presenting options to the Policy Board and community stakeholders prior to rate adoption. Quantitative studies are conducted to ensure that rates are fair, equitable, and competitive while recovering necessary costs. One way 3CE does this is by designing rates using a cost-of-service rate structure. The cost-based rate structure allows for simple, stable rates that support 3CE's commitments to customer benefits, community investment, and the growth of clean and renewable energy.

When proposing either participation in a dynamic pricing program or customer rate option, 3CE will ensure that charges to the customer follow these same principles. 3CE will only seek Board approval for time-dependent rates after such rates have been proven to be cost-effective, equitable, technologically feasible, and beneficial to customers and the grid. This could result in an array of marginal rates for all customers, or fewer for more niche customer classes that are proven cost-effective.

The CEC LMS requests the Large CCAs to present at least one marginal cost-based rate to their Boards by July 1, 2025. In the original version of this plan, 3CE found that it did not have sufficient evidence to conclude that independently developing and implementing dynamic rates in 3CE's service area on the timeline outlined in the LMS would be cost effective or provide material incremental reductions to peak load beyond those of its current rate and programs portfolio for any customer class. However, 3CE had already begun investigating various pathways that achieve the LMS timelines through opportunities, such as the IOU-partnered programs approved for expansion to CCAs by the CPUC in the Demand Flexibility proceeding (R.22-07-005).³ As detailed in this plan, 3CE has met the LMS timeline under Section 1623.1(b)(2) by committing to two CPUC dynamic rate pilot opportunities: PG&E's Expanded Pilots 1 and 2. 3CE will utilize experience participating in the pilots to evaluate the development of an independent rate or program by July 1, 2027, per Section 1623.1(b)(4).

Balancing the availability of opportunities and limited meetings 3CE's Policy Board in conjunction to those timelines, ***the first step of instituting this LMS Plan was for 3CE's the board to approve and authorize the CEO to submit the original LMS plan to the CEC as well as any subsequent updates which align with the written CEC LMS.*** The original approval and designation of 3CE's LMS plan occurred on February 1, 2024.⁴ 3CE's board will still have the ultimate authority, but the designation to the CEO allows 3CE to meet all LMS timelines and potential opportunities without delay due to the cadence of board meetings. 3CE will provide updates to its Board in its next plan iteration and any annual reports.

³ California Public Utilities Commission. D.24-01-032. Accessed February 2024.

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M524/K176/524176497.PDF>.

⁴ 3CE Policy Board of Directors February 21, 2024 Meeting Agenda. Accessed August 2025.

<https://pub-3ce.escribemeetings.com/FileStream.ashx?DocumentId=4127>

Table 2: Goals Met or Progressed by Participating in Existing IOU Programs

CPUC Approved Programs	Load Management Standards	LMS Goal Date	Potential Program Start Date
1. PG&E Expanded Pilot 1	§1623.1(b)(3): Submit to the CEC a list of load flexibility programs deemed cost effective. At least one option to automate response to MIDAS signals for each customer class where 3CE's Board has determined it would materially reduce peak demand.	2-Oct-24	1-Jun-24
2. PG&E Expanded Pilot 2			
3. SCE Dynamic Rate Pilot	*Both pilot opportunities could allow customers to respond to MIDAS signals to shift their energy usage to times where energy is less expensive.		1-Jun-24
1. PG&E Expanded Pilot 1	§1623.1(b)(2): Submit at least one marginal cost-based program to Board for approval for any customer class where such a rate will materially reduce peak load.	1-Jul-25	1-Jun-24
2. PG&E Expanded Pilot 2			
3. SCE Dynamic Rate Pilot	*Rates utilized for these pilot programs utilize pre-approved CPUC rate formulas. Board approval to participate would also be consenting to utilizing the IOU formulas.		1-Jun-24
1. PG&E Expanded Pilot 1	§1623.1(b)(2) Offer Customers voluntary participation in either a marginal cost-based rate, or cost-effective load flexibility program.	1-Jul-27	1-Jun-24
2. PG&E Expanded Pilot 2			
3. SCE Dynamic Rate Pilot	*Participating in either pilot would create a voluntary participation opportunities in a load flexibility program for 3CE customers.		1-Jun-24

List of cost-effective LMS-compliant programs and rates

1623.1(b)(3) requests the Large CCAs to submit a list of load flexibility programs deemed cost effective to the Executive Director by October 1, 2024. At least one program must allow for automated responses to MIDAS signals for each customer class that the rate-approving body had determined the program would materially reduce peak load. 3CE met this goal and has since expanded its related programmatic offerings. The following section outlines current programs and considerations for 3CE's governing board, our rate-approving body.

Hourly-MIDAS signals-based load flexibility programs

3CE's board has already approved work to support demand management that responds to real-time pricing (RTP) signals. The incorporation of hourly-MIDAS signals will be considered as the system is tested and proven it can be effectively integrated into 3CE and third-party platforms.

Participation in CPUC Approved Programs

3CE is participating in and has begun customer enrollment in CPUC approved dynamic rate pilot opportunities across its service area, aligning with the California Energy Commission's LMS. 3CE enrolled in CPUC Expanded Pilots 1 and 2 through the filing of Tier 1 Advice Letters on May 3, 2024, and January 22, 2025.^{5 6}

Pacific Gas & Electric (PG&E) Expanded Pilot 1 and 2:

The original agricultural dynamic rate pilot (AgFIT) aimed to help farms manage costs by optimizing energy load for irrigation. Decision (D.) 24-01-032 expanded the program, Expanded Pilot 1, to all Agricultural end uses and directs PG&E to offer Expanded Pilot 2 to residential and commercial customers. The Decision allows all CCAs in PG&E's service area to participate until the pilot conclusions on December 31, 2027.

Pilot Generation Rate:

For the generation components of the Expanded Pilots, energy costs (1) are based on CAISO wholesale market prices, and (2) generation and flexible capacity costs are recovered hourly using the scarcity pricing concept.⁷ The capacity cost recovery functions for all components will be calibrated to fully recover annual LSE generation costs and UDC delivery costs. Additional costs may be recovered through existing rate structures or a monthly subscription charge.

Target Customers:

The Expanded Pilot 1 is open to customers on AG-A1, AG-A2, AG-B, and AG-C rates for any end use. Expanded Pilot 2 is open to customers on E-ELEC, EV-2A, B-6, B-10, B-19, and B-20.⁸

⁵ Central Coast Community Energy, *Notification of Enrollment of Customers in Pacific Gas and Electric Company Agricultural Dynamic Rate Pilot*, Advice Letter 40-E (Tier 1), filed May 3, 2024, pursuant to D.24-01-032

⁶ Central Coast Community Energy, *Notification of Enrollment of Customers in Pacific Gas and Electric Company Expanded Pilot 2 Authorized in Decision 24-01-032*, Advice Letter 43-E (Tier 1), filed January 22, 2025, pursuant to D.24-01-032

⁷ California Public Utilities Commission. D.21-12-015. Accessed February 2024.
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M428/K821/428821475.PDF>.

⁸ California Public Utilities Commission. D.24-01-032. Accessed February 2024.
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M524/K176/524176497.PDF>.

Enrollment & Load Impact Projections:

3CE aims to enroll 5 MW of eligible load into the pilot programs, adopting a measured approach for effective planning.

Customers Protections:

Expanded Pilot 1 utilizes a subscription model, enabling customers to plan their workload and associated costs. The subscription load shape is based on the customer's historic hourly usage, billed at the legacy rate. Deviations are billed at the dynamic volumetric rate.

Both Expanded Pilots utilize shadow billing, which provides additional customer protection. The Shadow bills track participants' load-shifting performance and compensation from both 3CE and PG&E. The customer would never pay more than their original tariff cost.³ This ensures minimal risk to customers, incentivizing participation by aligning operations with cost-effective power times. The shadow billing method allows 3CE and PG&E time to consider necessary billing upgrades and customer enhancements.

3CE's participation demonstrates a commitment to equitable treatment for CCA customers. If PG&E mismanages the pilot, 3CE may proceed with its own AgFIT-inspired pilot in the future.

Equipment Requirements:

While automation equipment can assist in load-shifting, it is not necessary for the Expanded Pilots.⁹

Third-party Automation Providers:

As determined by D. 24-01-032, PG&E will manage contracts with third-party vendors. In the Expanded Pilots, PG&E would collaborate with third-party automation service providers.

6 Month Update: Marginal Rate Program Performance

Since beginning enrollments in PG&E's Hourly Flex Pricing Pilot 1 & 2 in January 2025, 3CE has had 74 individual meters enroll. A breakdown of customer enrollments by segment and aggregate total enrolled load is shown below:

Pilot	Customers Enrolled	Total Enrolled Load
Expanded Pilot 1 (Agricultural)	6	4.04 GWh
Expanded Pilot 2 (Commercial)	56	13.50 GWh
Expanded Pilot 2 (Residential)	12	0.10 GWh
TOTAL	74	17.64 GWh

Table: 3CE Expanded Pilot Enrollment as of August 28, 2025.

Southern California Edison (SCE) Dynamic Rate Pilot:

SCE is conducting the CalFUSE Dynamic Rate Pilot, expanded to CCAs by D.24-01-032. The generation component includes a capacity price function with day-ahead CAISO energy as a

⁹ Polaris Energy Services. "Polaris +Valley Clean Energy | 2022 Incentive Program." YouTube video. August 18, 2022. https://www.youtube.com/watch?v=JnJJCIVSs_c

passthrough. Due to delays in the development and CCA enrollment in SCE's Dynamic Rate Pilot, 3CE opted to participate in PG&E's pilot to gain insight into the development of real time pricing.

OhmConnect

3CE entered into a marketing agreement with OhmConnect, a third-party demand response company, to help customers load shift. Customers using OhmConnect can lower their electricity bill and earn rewards. OhmConnect is a free service that rewards utility customers in California and other states for saving energy. When customers can sign up to receive alerts when energy is most expensive and non-renewable. If the customer saves electricity during peak times, OhmConnect will provide awards through gift cards or even cash via Paypal. OhmConnect is able to provide these rewards by bundling the energy savings of all of its users and selling it back to the California Independent System Operator's (CAISO) energy markets. CAISO pays OhmConnect for the energy that is not used. Customers who are enrolled with OhmConnect are not able to participate in the Expanded Pilot 1 or 2 due to its categorization of a dual enrollment program as a supply-side Demand Response programs or event-based load-modifying programs, regardless of the Load Serving Entity.

3CE's Residential Battery Rebate Program and Potential Demand Response Program

3CE launched its Residential Battery Rebate Program on July 22, 2024, to achieve load shifting by increasing the adoption of behind-the-meter battery storage systems. The program empowers individual customers to cost-effectively manage their electricity use, leading to reduced demand in 3CE's territory during net peak hours. As of July 15, 2025, 3CE has received 425 applications for the program and shifted 1,391 kWh of load daily between 4PM and 9PM.

Additionally, 3CE is seeking a contractor(s) to design, implement, and manage a demand response program that leverages the batteries and potentially other grid-connected appliances to develop a suite of local distributed energy resources (DERs) that either 3CE or the program implementor can monitor and dispatch.

Independent Marginal Rate Design Timeline

Section 1623.1(b)(2) of the LMS requests the Large CCAs to seek approval from their Boards for at least one dynamic rate or cost-effective program for which its rate-approving body determines such rate will materially reduce peak load. The application must be submitted within twenty-seven months of the updated LMS effective date, or by July 1, 2025. The rate offered, if desired, can mirror the IOUs in whose service area the Large CCA exists. 3CE has met this requirement by receiving approval and formally committing to participate in the CPUC Expanded Ag Fit Pilots.

Section 1623.1(b)(4) of the LMS requests that within fifty-one months of the LMS effective date, the Large CCAs offer each customer voluntary participation in either a marginal cost-based rate, if approved by the Board, or a cost effective load flexibility program. 3CE will weigh the potential of offering its own program or a rate option to all of its customers. Offering a rate or a program, if 3CE were to do so independently from an IOU-partnered program or rate, 3CE would need to explore the development of its own Marginal Rate Design. Calpine Energy Solutions (Calpine) is 3CE's contracted back-office provider who fulfills this function and would assist in accomplishing the work referenced throughout this section.

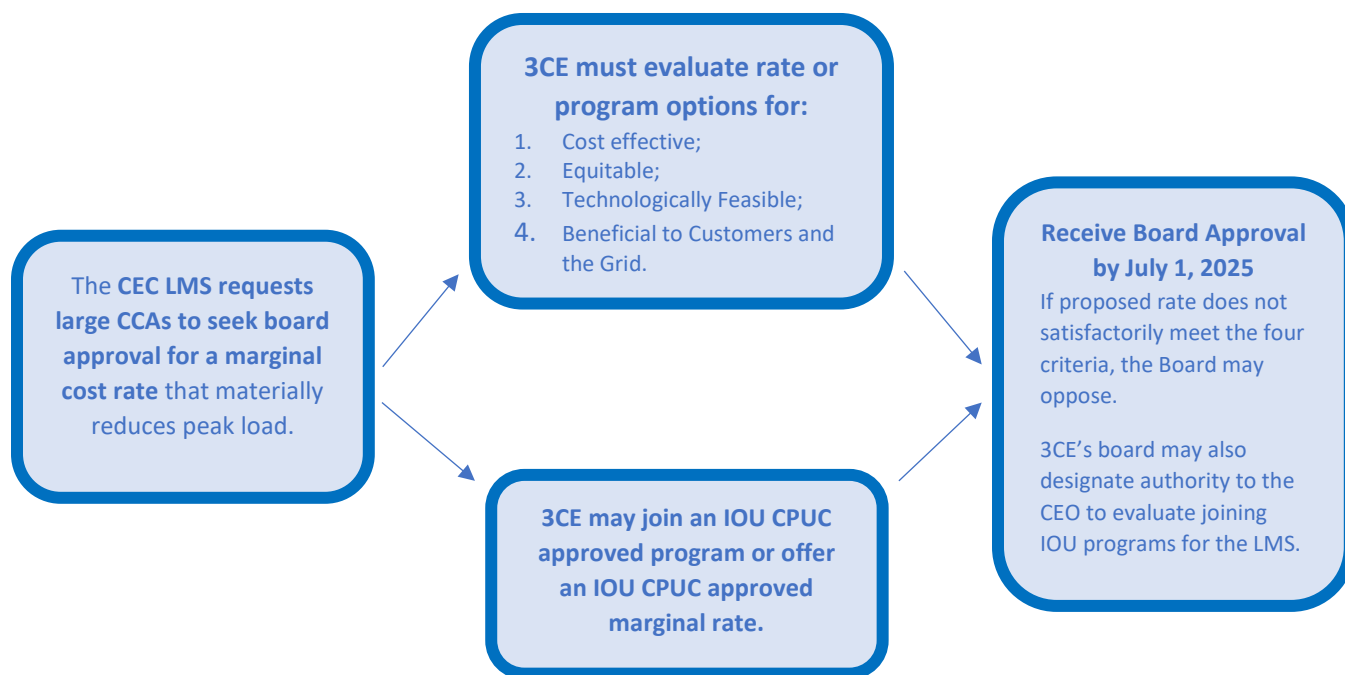
Independently creating a Marginal Rate Design would require setting up or subscribing to a real-time or day-ahead index sourcing data from CAISO markets and integrating it into the back-office

provider's billing system. 3CE, Calpine, and potentially a rate design consultant, would develop the customized rate design to layer on top of the pricing signals coming from the index. Receiving interval data at the appropriate incremental level would be crucial for this program or rate.

Depending on how the IOUs make interval data available to the CCAs, Calpine would have to develop internal infrastructure to accept and provide quality assessments of new data streams coming from both SCE and PG&E. Due to current energy meter capabilities, technological shortfalls, or delayed timeliness of receiving data from the IOUs, it is inevitable that interval data will not be available for some customers some of the time. For those cases, 3CE and Calpine, would need to consider how to design a hierarchy of data to be substituted from other available sources. Any new program of this nature would require custom process controls to ensure accuracy and timeliness and custom reporting would have to be designed, built and maintained.

The LMS and CEC guidance states that rates must be shown to be (1) cost-effective, (2) equitable, (3) technologically feasible, and (4) beneficial to customers and the grid. 3CE would need to evaluate these factors along with its own standards of equitable and stable rate design if it elected to develop marginal rates and track them over time. The LMS requests that a single marginal rate be proposed to our board by April 1, 2025. The following sections outline 3CE's initial assessment of the four LMS rate criteria.

Image 1: Flowchart for LMS Rate or Program Approval Process



Cost effectiveness

To evaluate the cost-effectiveness of Marginal Rate Designs and related programs at 3CE, both costs and benefits must be considered with the initial program and monitored over time as it matures. 3CE will consider the development of a framework or formula identifying and quantifying the cost-effectiveness. Demand-side management cost effectiveness tests are widely accepted and offer a general guideline or reference to developing a quantification of the cost and benefit for Marginal Rate

Designs for 3CE and its customers. In California, the CPUC references these common cost-benefit tests for use in evaluating energy efficiency, demand response, and distributed energy resource program selections and justification. Some tests 3CE could utilize to evaluate cost-effectiveness include the Total Resource Cost (TRC), Ratepayer Impact Measure (RIM), Program Administration (PA), and Participant (PCT) Tests. Each of these tests generally evaluates the costs of the program or measure from the utility and/or customer point of view and the benefits in reduced bills for customers or costs for utilities.

To support the cost-effective evaluation of the marginal rate program and rates, 3CE will need to evaluate developing a calculation based on the TRC for energy efficiency measures. A simplified TRC calculation is a ratio of total benefits divided by total costs. If the TRC calculation is greater than 1.0, it means the total benefits outweigh the total costs. This could be performed by 3CE on a class-by-class basis for the marginal rate program to better inform performance and program related decisions. It could also consider societal benefit elements; however, they may be secondary qualitative benefits rather than quantified within the ratio of benefits to costs.

Components and elements to use in the cost-effectiveness calculation could include:

Costs to 3CE

- Program administration, staff time, applicable pilot programs, any customer information system or Calpine costs, etc.
- Customer incentives or rebates paid to participants to offset costs of a third party, new behind-the-meter device, or new technology application
- Potential cost difference between day-ahead-market forecast to real-time-market

Benefits to 3CE and its Customers

- Avoided energy and capacity/resource adequacy costs including incremental reserve margin considerations
- Environmental or greenhouse gas (GHG) reductions
- Other societal benefits, if desired and quantifiable; if not quantified, could be qualitative and considered in evaluation
- The CPUC Avoided Cost Calculator (ACC) could also be used to standardize the benefits of avoided energy, capacity, and GHG costs

Potential Metrics

- Marginal rate benefit to cost ratio for customer classes (a ratio of greater than 1.0 represents the benefits outweighing the costs)
- Other societal or qualitative benefit considerations

Equity

Equity for Marginal Rate Designs should focus on two items: 1) the equity in the actual rate making and design of the rate to avoid cost shifting and 2) equitable customer access to and benefits from the program. Equity in rate making is a fundamental principle and goal in regulatory and utility economics. Equity in reference to rate making is often linked to cost of service (COS) results which document and develop rates that are based on each customer class's costs imposed on the system to provide electric service. Comparing the customer class's COS and existing rate revenues identify

potential subsidization issues from one or more customer classes to others. To avoid potential subsidies, COS-based rates are typically used as the basis for rate making. Thus, for equitable marginal rates in each class, a COS study or similar cost-based quantification with marginal costs for the marginal rates should be utilized.

Addressing equity is an important factor for 3CE. 3CE has an Underserved Communities Outreach and Engagement Plan that will be utilized to identify communities that have the potential to benefit most from possible cost savings of a marginal cost rates. The Engagement Plan also outlines the networks to collaborate with to engage most effectively with those communities.

To monitor and evaluate broader equity in customer participation for the program, 3CE would consider the development of various goals, targets, and even metrics to report on and guide strategy for the implementation of the marginal rate and plan across customer classes. With the implementation of complicated marginal rates which require a third party and application of new technologies, certain customer classes and customer segments within classes could be underserved unless thoughtful attention is made to ensure their enrollment and continued success. Residential and small commercial customer classes are likely to be less prepared to take advantage of marginal rate or program opportunities than larger, commercial and industrial customers with experience in these areas. To ensure equitable access to the marginal rate benefits or programs, especially in penetrating the residential and small commercial customer classes, 3CE may need to consider developing additional incentive programs to support adoption in these “hard to reach” or low-income and small businesses customer segments. These incentives would be designed to increase the adoption rates of the Plan and support the equitable availability and benefits of the marginal rates.

Possible metrics and goals 3CE will consider:

- Residential Customer Class:
 - Number of disadvantaged residential customers identified by 3CE load research that would benefit from marginal rates and were contacted to participate in incentives and the program.
 - Percent of total disadvantaged residential customers adopting marginal rates
- Small Commercial Class:
 - Number of local, small, or diverse business customers identified by 3CE load research that would benefit from marginal rate or program and were contacted to participate in incentives and the program.
- Percent of total local, small, or diverse businesses adopting marginal rates

Technologically Feasible

The third factor for evaluating the Marginal Rate Design and program is technological feasibility. 3CE would need to evaluate the rate design implementation for internal, customer, external-third-party technologies needed to utilize and take advantage of the new marginal rates.

Internal 3CE Technology Feasibility

The creation of a Marginal rate, if 3CE’s board chooses to move forward with the design and implementation, is technologically feasible. All data required to design the cost-based rates is currently available via energy market data sources and 3CE’s own customer usage data. As the Load-Serving Entity (LSE) marginal rates will be focused on power supply costs, all load profile data, hourly energy

consumption, and class contributions to system peak demands are already known and available. Furthermore, 3CE and many CCAs have years of experience collaborating with, integrating, and utilizing IOU data sets including billing determinant data, charges and rate structures, and load profiles.

If 3CE's board chooses to implement and support the ongoing operation of a marginal rate or program, it will require additional technology or programming support to implement enhanced analysis and evaluation of marginal rates and programs. As a part of the implementation, 3CE data analytics would need to augment resources with a combination of external vendor support or internal up-scaling of staff. This could include investments in software, analysis, or machine learning to support the identification of specific customers or load profiles that would benefit from marginal rates. This type of additional effort and investment could support targeted marketing and increased beneficial participation in the program over time.

Customer Technology Feasibility

Availability of customer technology that can gather, understand, and take advantage of marginal rate pricing signals and opportunities is a critical success factor for these rates. One of the key data inventories and technology systems customers must interface with to take advantage of these opportunities is the CEC's MIDAS. MIDAS is intended to house an up-to-date inventory of utility rates for participating Californian electric utilities. For customers to participate in the marginal rate program, they must team with a third party or create their own Application Programming Interface (API) connection to MIDAS to continually receive the Real Time Pricing (RTP) rates required to make consumption related decisions. It is common for existing energy service companies to already have APIs set up to receive information from the local IOU on behalf of their customers or participants in utility programs. As energy service companies typically target and cater to large business and industrial customers, it is expected these classes will have early access to the RTP rates and enable the implementation in those classes. Further expansions of third parties or energy service companies into the small commercial and residential customer classes may lag behind the larger commercial and industrial customer classes.

There are customer-facing technologies that are currently, or will in the near future, have capabilities to interpret and enable actions based on the marginal rate pricing signals. These are likely to include current or expected two-way communication technologies and equipment such as EV charging, smart thermostats, battery storage, building control systems, and other energy efficiency programs or technologies currently in place. These existing customer technologies and equipment span residential to industrial customers. Thus, 3CE should be open to marginal rate program penetration in all customer classes and segments. While there are no specific metrics or key performance indicators initially identified in the technologically feasible factor, 3CE will continue to monitor customer enabling technologies, programs, or equipment available in each customer class to ensure opportunities in each customer class.

Potential Metrics for Customer Technology Feasibility

- 3CE could internally identify customers that would benefit from marginal rates or track the number of third-party technology providers serving each customer class.

Beneficial to Customers and the Grid

If 3CE were to design a marginal rate or program it would need to support benefits for both the customers and grid. One way of doing so is using cost-based principles within the rate design. This provides an impartial view of the costs and benefits which allows customers and related enabling technologies to make choices on the economics and then shift or change consumption patterns. Below is a summary of the customer and grid-related benefits.

Customer Benefits

Customer benefits could potentially include reduced bills if optimized and properly managed by the customer or third-party technology. A reduction in demand should result in lower costs for all customers during peak hours. While marginal rates provide opportunities for reduced costs and bills, there is also the potential for increased risks related to volatile market prices. Customers must manage these market pricing risks or have a way to mitigate them during large pricing fluctuations, seasonal shifts, or weather events. To address the large potential pricing fluctuations in the market, 3CE could consider an additional fee, subscription model, or fixed charge related to the marginal rate or program for customers. This added rate component would act to support a pricing mitigation or hedging program on behalf of customers to limit customer's exposure to large swings in prices or weather events. 3CE could consider offering this program or allowing the market and third parties to develop a pricing exposure or hedging service for customers.

Grid Benefits

Grid related benefits are assumed to be shared or passed through to customers. These financial benefits are directly linked to the marginal rate and cost-basis which include avoided future generation capacity or resource adequacy costs and avoided energy purchases. There may also be reduced GHG compliance costs which would also benefit the utility and grid. Broader non-economic benefits would include reduced GHG emissions.

Potential Metrics for Grid Benefit

- Reduced customer bills
- Reduced utility energy and resource adequacy costs
- Reduced GHG compliance costs
- Reduced GHG emissions

Resources to Create Marginal Rate Design

The examination of marginal rate design and potential programs has already incurred costs, utilized staff time, and consumed resources. To create a Marginal Rate that considers the four criteria described in the previous section, 3CE would need to hire a Rate Design Consultant to assist in the evaluation. The final rate designed by the consultant would then need to be presented to the board for approval.

Resources and efforts that have already been spent:

In the development of this plan, 3CE has already dedicated the following efforts:

- Time to create a Request for Proposal (RFP) for a Rate Design Consultant.
- Cost of Rate Design Consultant to consider variables and initial evaluation of LMS requirements.
- Analysis from back-office providers on needs for billing and customer performance evaluation of marginal rates.
- 3CE staff time to
 - Participate in CEC LMS Working Groups.
 - Conduct vendor negotiations and contract development for consultants.
 - Produce the LMS Plan and present it to their board

Future Resources and Efforts Estimation

Based on our initial assessment, we have determined that while aspects of future creation of marginal rates are feasible, the overall effort needed for a final product will be significant and require contracting with an external rate design consultant.

3CE Staff Needs:

- Finance and Rates staff representative(s) to support marginal rate development, cost research and analysis and rate making.
- Customer Engagement or Customer Programs staff and leadership to support stakeholder engagement and development of the incentives and overall Plan.
- IT and Data Warehouse staff to support data queries, machine learning efforts and analysis of customer and system loads.

Rate Design Consultant Needs:

- Rate Design Consultant contract and staff to support and develop marginal rates.
- Ongoing support and evaluation of 3CE's LMS Plan, potential research topics and data analytics.

Rate Deployment Timeline

Once a rate or program is designed and tested, the logical progression to contemplate is the deployment of the rate and customer enrollment. Section §1623.1(b)(2) requests that the Large CCAs offer customers voluntary participation in either a marginal cost-based rate, if approved by the Board, or a cost-effective load flexibility program by July 1, 2027. The timeline of deployment is dependent upon whether 3CE's board elects to adopt a marginal rate that mirrors the IOUs by participating in a CPUC-approved program or chooses to design its own rate or program. The Board will make their assessment based upon the lessons learned from potential pilot participation, rate consultant insights, and staff recommendations.

Anticipated Resources for Rate Deployment

To deploy a marginal rate, 3CE would need to complete its design and seek approval from the Policy Board. If staff were directed to deploy the rate, this would require both internal infrastructure and staff to support customer outreach. The exact requirements would be based upon final program design and targeted customers.

Although not exhaustive and subject to change, 3CE anticipates that the following resources would be needed to successfully deploy a new marginal rate in its service area:

- Internal rate education by rate design consultant.
- Full Outreach Campaign Design & Budget
 - o Defined goals and outreach strategy
 - o Clear messaging for targeted audience
 - o Additional warm-up campaigns for historically hard-to-reach customers
- Website development
- Call Center Training
- Customer Marketing & Education on the rate opportunity
- Design Marketing Collateral
- Informational Webinars
- 1:1 Contact with enrolling customers
- 1:1 Ongoing Contact throughout enrolled customers participation
- Email, Direct Mail, Social & Digital campaigns

Internal infrastructure for Marginal Cost Rates Adoption

Upgrades to 3CE's internal infrastructure and back-office provider capabilities are anticipated if marginal rates are adopted. Although not an exhaustive list, below are anticipated areas where staff and contracted vendors will need to consider upgrades:

Billing system compatibility review and improvement plan and resource commitment:

Implementing a marginal rate in general or more specifically an expansion of the AgFIT program, would require a significant investment in billing engine infrastructure upgrades and staff training for 3CE's back office-provider, Calpine Energy Solutions. In order to train existing staff and potentially bring on new team members to support these innovative rate structures, Calpine, would set weekly meetings to ensure a comprehensive understanding of the regular requirements to support those rates. Weekly meetings to design the program including the billing system, controls, processes, and reporting would also be expected.

A significant component of the work to support marginal rates would go into developing the new rate sheets. New hourly rate sheet will need to be designed, tested, and their cadence determined. This may require daily price updates, depending on program structure.

In order to appropriately bill customers on any form of marginal rate, 3CE and their back-office provider, Calpine, would need to receive the appropriate interval usage data from PG&E for participating customers. Calpine would be expected to implement this process, new controls and reporting would be needed, as well as updates to the internal customer information system and contact center talking points for external communication. A significant amount of staff time would be allocated to monitoring the new systems in place to support the marginal rate or program. This work would also be determined based on the size of the customer segment targeted for participation and different needs for that customer type, whether they are residential, commercial, or agricultural.

3CE would also need to work with a Rate Design Consultant to ensure an hourly marginal costs-based rates calculation system was developed. This would require upgrades to the current billing system functionality. Due to the necessary upgrades and additional services required for marginal rate

implementation, 3CE anticipates that it would need to be able to cover increased costs on data storage, data transfer, legal review, staff time, and more.

Time-Dependent rate submission to MIDAS via MIDAS Application Programming Interface (API)

Status of MIDAS submissions for current time-dependent rates

3CE has successfully uploaded all generation rates and associated RINs to the CEC's MIDAS server. 3CE has a total of 588 rates uploaded into MIDAS including base rates and rates with price adders spanning both their PG&E and SCE territory combined. 3CE will continue to upload our generation rate components.

A comprehensive list of the rates 3CE has uploaded to MIDAS is included as Attachment A. .

Composite rate calculation and submission solution

3CE will continue to input our generation rates into MIDAS and will upload these rates into the MIDAS platform. 3CE does not plan to upload transmission and distribution rates that are designed by the IOUs.

Plan for ensuring accuracy and maintenance of current time-dependent rates

3CE has worked with our back-office provider, Calpine, to ensure that rates uploaded to MIDAS precedes customer billing on that rate. Calpine intends to streamline and update the rate transformation and upload process in the coming months in preparation for potential new requirements such as supporting marginal rates as they are designed and deployed by various LSEs. Part of changes that Calpine anticipates depend heavily on the issues that arise with the MIDAS server. Calpine has reported that, historically, the MIDAS server has been fragile and slow. Calpine has had to adjust its uploading methods to accommodate a system that rejects rates when an upload packet is too large and at times has been fully inaccessible. If these issues persist, they would constitute a significant challenge for uploading marginal rates on a daily basis.

Internal infrastructure progress/upgrades for LMS-complaint submission to MIDAS

3CE's back-office provider, Calpine, assisted with our successful and ongoing uploads to MIDAS by building a software application that transforms rate data into XML hourly streaming format and then uploads them to MIDAS through the provided API.

Uploading future marginal rates to the MIDAS server on a daily cadence will pose a significant challenge to Calpine. Calpine staff will need to devote regular meetings to tackling the issue of streamlining the current upload process, which to this point can take three days or longer, depending on the receptiveness of the MIDAS server. Calpine would need to build additional internal infrastructure to transform rates more quickly and find a way to upload them significantly faster than the server currently allows. Reporting for MIDAS uploads is currently manual and Calpine will need to develop automated reporting as a practical step for assuring 3CE that uploads are occurring timely and accurately.

Plan to provide RIN(s) on customer billing statements

Implementation plan with timeline

1623(c)(4) of the LMS requests that by March 31, 2024, RINs be incorporated into customer billing statements. Given that the IOUs act as billing agents, the design, placement, and input for RINs on the

bill by Large CCAs are restricted. Nevertheless, 3CE will collaborate with our IOU partners to furnish RINs and customer information, facilitating their inclusion in the billing statement.

Billing system updates

3CE's back-office provider and IOUs have been in consistent communication to facilitate a plan for passing RINs created by Calpine to the IOUs for inclusion on customer invoices and to transform into QR codes. After several meetings, the IOUs have agreed to utilize the preferred Electronic Data Interchange 810 file (EDI 810) based on the merits of that EDI transaction set and in order to streamline the process across the different territories.

3CE foresees only one potential future issue, but has already reached a workaround until a more formal solution can be implemented by PG&E and Calpine. The rate ready billing method presents a unique challenge for passing RINs to PG&E because Calpine does not send 810s for those customers. Calpine and PG&E have tentatively agreed that Calpine will provide PG&E with a list of rates and their corresponding RINs. With that, PG&E will be able to include the appropriate RINs and QR codes on the bills as an integrated part of the rate ready billing process.

Proposed text design and QR code design and proposed placement on billing statements

As stated, the Large CCAs are limited by the IOUs in terms of design and placement of text and images on billing statements. However, 3CE is working with the IOUs to have consistent and understandable language regarding the RINs for customer understanding.

QR code linked webpage and design:

3CE anticipates that the QR code linked webpage on the customer bill will be to an IOU landing page that the Large CCAs have limited input. It is important that the Large CCAs are able to provide feedback to the IOUs, but we would likely augment the information with the webpages 3CE currently has. 3CE already supports the customer experience by having information on 3CE's website that provides a description of 3CE's rates and how rates are set and can provide a link to the MIDAS platform. Additionally, 3CE's website already provides information on 3CE's customer rate options and eligible programs.

Plans and current participation in the development of Single Statewide RIN Access Tool

Per Section 1623(c), 3CE has been working with the other regulated load serving entities (LSEs) on creating the Single Statewide RIN Access Tool pursuant to 20 CCR Section 1623(c). 3CE has already participated in working groups and development of an initial proposal for the RIN Access Tool. The proposed plan for the tool was submitted to the CEC for review on October 1, 2024. 3CE will continue to work with the other LSEs and the CEC on the implementation and maintenance of the statewide RIN tool in a timely manner subject to the tool's approval by the CEC. The cost, design and implementation of the statewide RIN tool must be equitable to all customer types and address key issues. To ensure the tool best serves Californians, 3CE encourages the Commission to prioritize the following in its development:

- Funding and cost allocation for the Joint LSEs' Single Statewide RIN Access Tool are not addressed in the LMS. Funding must be determined before finalizing the tool's structure, with consideration of beneficiaries, Automated Service Providers, and their financial contributions.

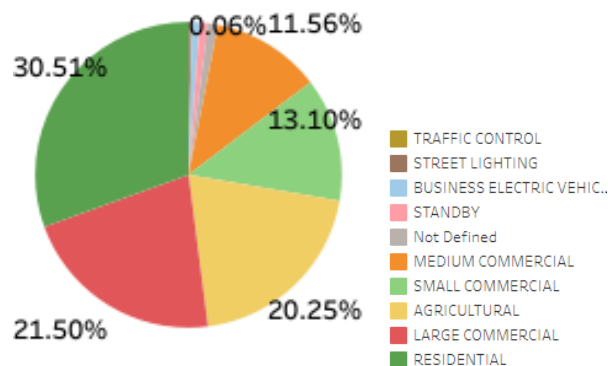
- Evaluation metrics for the review of cost effectiveness and benefit of the RIN Access Tool to customers.
- Coordination between the Commission and the CPUC to ensure compatibility on real-time pricing system architecture, integration into dynamic rates, and potential funding sources.
- Cybersecurity measures to ensure customers personally identifiable information is safeguarded.
- Equitable user experience for both bundled and unbundled customers in utilization of the tool.

Additional Information Regarding Marginal Cost Rates & Programs

In formulating any rate or program, 3CE considers the distinctive requirements of our service area. Our commitment revolves around investing in the communities we serve, ensuring competitively priced rates, and offering energy program rebates and incentives that facilitate the transition of 3CE customers' homes, workplaces, and transportation from fossil fuel power to clean energy solutions.

Two notable features of 3CE set it apart: first, it stands as the largest CCA geographically, spanning over five counties across the central coast. Second, it caters to a substantial number of Agricultural customers, constituting approximately 22% of our total load. The communities and business operations within 3CE's service area are diverse, with varying factors like the types of crops grown by farmers influencing when and how they can modify their energy usage. This diversity extends to encompass small and large businesses, as well as residential customers across our service area. Below, Graph 1 provides insight by showing the breakdown of our load by various customer types. Given this vast geography and diverse customer base, it is crucial to consider the distinctive needs and usage behaviors of all customers when introducing new programs and rates.

Graph 1: 2023 Electric Load Percentage by Customer Type



Public Information Program on Marginal Cost Rates/Programs

Section 1623.1(b)(5) of the LMS asks the Large CCAs to conduct a public information program to inform and educate affected customers why marginal cost-based rates or load flexibility programs and automation are needed, how they will be used, and how these rates and programs can save customers money.

3CE has a successful history of educating its customers spanning two IOU service areas on various energy related initiatives. These experiences include marketing the Time of Use Transition, our Cost-of-Service Rate launch, highlighting customer programs like CARE, FERA, AMP, CAPP and PIPP, and promoting our portfolio of energy programs and initiatives. 3CE also maintains consistent communication across its five-county region through monthly newsletters and social media posts.

To date, 3CE has taken the initial steps of promoting dynamic pricing through the following actions:

- Creation and maintenance of web page with information on the Expanded Pilot 1 and 2, as well as hyperlinked ASP names for convenient customer access.
- Call center equipped with extensive list of frequently asked questions and answers for those customers looking to learn more about dynamic rates and/or the Expanded Pilots 3CE is currently offering.
- 3CE has participated in over 5 public presentations to farm bureaus and chamber of commerce events to promote enrollment in the Expanded Pilot 1 and 2.
- Over 10 key account meetings have occurred to discuss a personalized enrollment plan into the Expanded Pilot 1 or 2
- Email marketing campaigns sent to the top energy users across each eligible rate code in the Expanded Pilot 1 and 2.

As 3CE learns more about dynamic rate implementation through participation in the pilot, it will inform a future development of the public information campaign as 3CE considers the development of independent dynamic rates or programs. This would include more general information about marginal cost-based rates and customer benefits of participating in load flexibility opportunities. This may include direct mail, website, social media, newsletter articles, monthly content shares, and public presentations. 3CE would also consider working with community partners to ensure that all customer segments are reached.

Conclusion

3CE expresses gratitude to its Policy Board for considering this plan and for their leadership in adopting programs and rates that benefit the communities we serve. The plan underscores 3CE's dedication to supporting the Central Coast region through grid reliability and customer-focused programs. It is important to note that the adoption of this plan and its considerations are subject to potential changes by our governing boards. New information on marginal rates and programs, as well as evolving customer needs, may influence these decisions.

Looking ahead, this plan remains flexible, open to adjustments as new information and opportunities emerge. 3CE staff will continuously assess opportunities to uphold reliability and align with the state's goals. The organization will explore rate and program designs that align with its values and support customers. As long as 3CE's goals, guided by our governing boards, align with those outlined in the CEC's LMS, the organization will voluntarily strive to meet the indicated standards.

Attachment A: MIDAS Rate Imports

Rate Name	RIN - Calpine	RIN - MIDAS
A-1-B Choice Flat	USCA-XXMB-0001-PGE	USCA-XXMB-0001-PGE
A-1-B Choice GR1	USCA-XXMB-0002-PGE	USCA-XXMB-0002-PGE
A-1-B Prime Flat	USCA-XXMB-0003-PGE	USCA-XXMB-0003-PGE
A-1-B Prime GR1	USCA-XXMB-0004-PGE	USCA-XXMB-0004-PGE
A-10-B-P Choice Flat	USCA-XXMB-0005-PGE	USCA-XXMB-0005-PGE
A-10-B-P Choice GR1	USCA-XXMB-0006-PGE	USCA-XXMB-0006-PGE
A-10-B-P Prime Flat	USCA-XXMB-0007-PGE	USCA-XXMB-0007-PGE
A-10-B-P Prime GR1	USCA-XXMB-0008-PGE	USCA-XXMB-0008-PGE
A-10-B-S Choice Flat	USCA-XXMB-0009-PGE	USCA-XXMB-0009-PGE
A-10-B-S Choice GR1	USCA-XXMB-0010-PGE	USCA-XXMB-0010-PGE
A-10-B-S Prime Flat	USCA-XXMB-0011-PGE	USCA-XXMB-0011-PGE
A-10-B-S Prime GR1	USCA-XXMB-0012-PGE	USCA-XXMB-0012-PGE
A-10-B-T Choice Flat	USCA-XXMB-0013-PGE	USCA-XXMB-0013-PGE
A-10-B-T Choice GR1	USCA-XXMB-0014-PGE	USCA-XXMB-0014-PGE
A-10-B-T Prime Flat	USCA-XXMB-0015-PGE	USCA-XXMB-0015-PGE
A-10-B-T Prime GR1	USCA-XXMB-0016-PGE	USCA-XXMB-0016-PGE
A-6 Choice Flat	USCA-XXMB-0017-PGE	USCA-XXMB-0017-PGE
A-6 Choice GR1	USCA-XXMB-0018-PGE	USCA-XXMB-0018-PGE
A-6 Prime Flat	USCA-XXMB-0019-PGE	USCA-XXMB-0019-PGE
A-6 Prime GR1	USCA-XXMB-0020-PGE	USCA-XXMB-0020-PGE
AG-4-A Choice Flat	USCA-XXMB-0021-PGE	USCA-XXMB-0021-PGE
AG-4-A Choice GR1	USCA-XXMB-0022-PGE	USCA-XXMB-0022-PGE
AG-4-A Prime Flat	USCA-XXMB-0023-PGE	USCA-XXMB-0023-PGE
AG-4-A Prime GR1	USCA-XXMB-0024-PGE	USCA-XXMB-0024-PGE
AG-4-B-P Choice Flat	USCA-XXMB-0025-PGE	USCA-XXMB-0025-PGE
AG-4-B-P Choice GR1	USCA-XXMB-0026-PGE	USCA-XXMB-0026-PGE
AG-4-B-P Prime Flat	USCA-XXMB-0027-PGE	USCA-XXMB-0027-PGE
AG-4-B-P Prime GR1	USCA-XXMB-0028-PGE	USCA-XXMB-0028-PGE
AG-4-B-S Choice Flat	USCA-XXMB-0029-PGE	USCA-XXMB-0029-PGE
AG-4-B-S Choice GR1	USCA-XXMB-0030-PGE	USCA-XXMB-0030-PGE
AG-4-B-S Prime Flat	USCA-XXMB-0031-PGE	USCA-XXMB-0031-PGE
AG-4-B-S Prime GR1	USCA-XXMB-0032-PGE	USCA-XXMB-0032-PGE
AG-4-B-T Choice Flat	USCA-XXMB-0033-PGE	USCA-XXMB-0033-PGE
AG-4-B-T Choice GR1	USCA-XXMB-0034-PGE	USCA-XXMB-0034-PGE
AG-4-B-T Prime Flat	USCA-XXMB-0035-PGE	USCA-XXMB-0035-PGE
AG-4-B-T Prime GR1	USCA-XXMB-0036-PGE	USCA-XXMB-0036-PGE
AG-4-C-P Choice Flat	USCA-XXMB-0037-PGE	USCA-XXMB-0037-PGE

AG-4-C-P Choice GR1	USCA-XXMB-0038-PGE	USCA-XXMB-0038-PGE
AG-4-C-P Prime Flat	USCA-XXMB-0039-PGE	USCA-XXMB-0039-PGE
AG-4-C-P Prime GR1	USCA-XXMB-0040-PGE	USCA-XXMB-0040-PGE
AG-4-C-S Choice Flat	USCA-XXMB-0041-PGE	USCA-XXMB-0041-PGE
AG-4-C-S Choice GR1	USCA-XXMB-0042-PGE	USCA-XXMB-0042-PGE
AG-4-C-S Prime Flat	USCA-XXMB-0043-PGE	USCA-XXMB-0043-PGE
AG-4-C-S Prime GR1	USCA-XXMB-0044-PGE	USCA-XXMB-0044-PGE
AG-4-C-T Choice Flat	USCA-XXMB-0045-PGE	USCA-XXMB-0045-PGE
AG-4-C-T Choice GR1	USCA-XXMB-0046-PGE	USCA-XXMB-0046-PGE
AG-4-C-T Prime Flat	USCA-XXMB-0047-PGE	USCA-XXMB-0047-PGE
AG-4-C-T Prime GR1	USCA-XXMB-0048-PGE	USCA-XXMB-0048-PGE
AG-5-A Choice Flat	USCA-XXMB-0049-PGE	USCA-XXMB-0049-PGE
AG-5-A Choice GR1	USCA-XXMB-0050-PGE	USCA-XXMB-0050-PGE
AG-5-A Prime Flat	USCA-XXMB-0051-PGE	USCA-XXMB-0051-PGE
AG-5-A Prime GR1	USCA-XXMB-0052-PGE	USCA-XXMB-0052-PGE
AG-5-B-P Choice Flat	USCA-XXMB-0053-PGE	USCA-XXMB-0053-PGE
AG-5-B-P Choice GR1	USCA-XXMB-0054-PGE	USCA-XXMB-0054-PGE
AG-5-B-P Prime Flat	USCA-XXMB-0055-PGE	USCA-XXMB-0055-PGE
AG-5-B-P Prime GR1	USCA-XXMB-0056-PGE	USCA-XXMB-0056-PGE
AG-5-B-S Choice Flat	USCA-XXMB-0057-PGE	USCA-XXMB-0057-PGE
AG-5-B-S Choice GR1	USCA-XXMB-0058-PGE	USCA-XXMB-0058-PGE
AG-5-B-S Prime Flat	USCA-XXMB-0059-PGE	USCA-XXMB-0059-PGE
AG-5-B-S Prime GR1	USCA-XXMB-0060-PGE	USCA-XXMB-0060-PGE
AG-5-B-T Choice Flat	USCA-XXMB-0061-PGE	USCA-XXMB-0061-PGE
AG-5-B-T Choice GR1	USCA-XXMB-0062-PGE	USCA-XXMB-0062-PGE
AG-5-B-T Prime Flat	USCA-XXMB-0063-PGE	USCA-XXMB-0063-PGE
AG-5-B-T Prime GR1	USCA-XXMB-0064-PGE	USCA-XXMB-0064-PGE
AG-5-C-P Choice Flat	USCA-XXMB-0065-PGE	USCA-XXMB-0065-PGE
AG-5-C-P Choice GR1	USCA-XXMB-0066-PGE	USCA-XXMB-0066-PGE
AG-5-C-P Prime Flat	USCA-XXMB-0067-PGE	USCA-XXMB-0067-PGE
AG-5-C-P Prime GR1	USCA-XXMB-0068-PGE	USCA-XXMB-0068-PGE
AG-5-C-S Choice Flat	USCA-XXMB-0069-PGE	USCA-XXMB-0069-PGE
AG-5-C-S Choice GR1	USCA-XXMB-0070-PGE	USCA-XXMB-0070-PGE
AG-5-C-S Prime Flat	USCA-XXMB-0071-PGE	USCA-XXMB-0071-PGE
AG-5-C-S Prime GR1	USCA-XXMB-0072-PGE	USCA-XXMB-0072-PGE
AG-5-C-T Choice Flat	USCA-XXMB-0073-PGE	USCA-XXMB-0073-PGE
AG-5-C-T Choice GR1	USCA-XXMB-0074-PGE	USCA-XXMB-0074-PGE
AG-5-C-T Prime Flat	USCA-XXMB-0075-PGE	USCA-XXMB-0075-PGE
AG-5-C-T Prime GR1	USCA-XXMB-0076-PGE	USCA-XXMB-0076-PGE
AG-A1 Choice Flat	USCA-XXMB-0077-PGE	USCA-XXMB-0077-PGE
AG-A1 Choice GR1	USCA-XXMB-0078-PGE	USCA-XXMB-0078-PGE

AG-A1 Prime Flat	USCA-XXMB-0079-PGE	USCA-XXMB-0079-PGE
AG-A1 Prime GR1	USCA-XXMB-0080-PGE	USCA-XXMB-0080-PGE
AG-A2 Choice Flat	USCA-XXMB-0081-PGE	USCA-XXMB-0081-PGE
AG-A2 Choice GR1	USCA-XXMB-0082-PGE	USCA-XXMB-0082-PGE
AG-A2 Prime Flat	USCA-XXMB-0083-PGE	USCA-XXMB-0083-PGE
AG-A2 Prime GR1	USCA-XXMB-0084-PGE	USCA-XXMB-0084-PGE
AG-B Choice Flat	USCA-XXMB-0085-PGE	USCA-XXMB-0085-PGE
AG-B Choice GR1	USCA-XXMB-0086-PGE	USCA-XXMB-0086-PGE
AG-B Prime Flat	USCA-XXMB-0087-PGE	USCA-XXMB-0087-PGE
AG-B Prime GR1	USCA-XXMB-0088-PGE	USCA-XXMB-0088-PGE
AG-C Choice Flat	USCA-XXMB-0089-PGE	USCA-XXMB-0089-PGE
AG-C Choice GR1	USCA-XXMB-0090-PGE	USCA-XXMB-0090-PGE
AG-C Prime Flat	USCA-XXMB-0091-PGE	USCA-XXMB-0091-PGE
AG-C Prime GR1	USCA-XXMB-0092-PGE	USCA-XXMB-0092-PGE
AG-F-A1 Choice Flat	USCA-XXMB-0093-PGE	USCA-XXMB-0093-PGE
AG-F-A1 Choice GR1	USCA-XXMB-0094-PGE	USCA-XXMB-0094-PGE
AG-F-A1 Prime Flat	USCA-XXMB-0095-PGE	USCA-XXMB-0095-PGE
AG-F-A1 Prime GR1	USCA-XXMB-0096-PGE	USCA-XXMB-0096-PGE
AG-F-A2 Choice Flat	USCA-XXMB-0097-PGE	USCA-XXMB-0097-PGE
AG-F-A2 Choice GR1	USCA-XXMB-0098-PGE	USCA-XXMB-0098-PGE
AG-F-A2 Prime Flat	USCA-XXMB-0099-PGE	USCA-XXMB-0099-PGE
AG-F-A2 Prime GR1	USCA-XXMB-0100-PGE	USCA-XXMB-0100-PGE
AG-F-A3 Choice Flat	USCA-XXMB-0101-PGE	USCA-XXMB-0101-PGE
AG-F-A3 Choice GR1	USCA-XXMB-0102-PGE	USCA-XXMB-0102-PGE
AG-F-A3 Prime Flat	USCA-XXMB-0103-PGE	USCA-XXMB-0103-PGE
AG-F-A3 Prime GR1	USCA-XXMB-0104-PGE	USCA-XXMB-0104-PGE
AG-F-B1 Choice Flat	USCA-XXMB-0105-PGE	USCA-XXMB-0105-PGE
AG-F-B1 Choice GR1	USCA-XXMB-0106-PGE	USCA-XXMB-0106-PGE
AG-F-B1 Prime Flat	USCA-XXMB-0107-PGE	USCA-XXMB-0107-PGE
AG-F-B1 Prime GR1	USCA-XXMB-0108-PGE	USCA-XXMB-0108-PGE
AG-F-B2 Choice Flat	USCA-XXMB-0109-PGE	USCA-XXMB-0109-PGE
AG-F-B2 Choice GR1	USCA-XXMB-0110-PGE	USCA-XXMB-0110-PGE
AG-F-B2 Prime Flat	USCA-XXMB-0111-PGE	USCA-XXMB-0111-PGE
AG-F-B2 Prime GR1	USCA-XXMB-0112-PGE	USCA-XXMB-0112-PGE
AG-F-B3 Choice Flat	USCA-XXMB-0113-PGE	USCA-XXMB-0113-PGE
AG-F-B3 Choice GR1	USCA-XXMB-0114-PGE	USCA-XXMB-0114-PGE
AG-F-B3 Prime Flat	USCA-XXMB-0115-PGE	USCA-XXMB-0115-PGE
AG-F-B3 Prime GR1	USCA-XXMB-0116-PGE	USCA-XXMB-0116-PGE
AG-F-C1 Choice Flat	USCA-XXMB-0117-PGE	USCA-XXMB-0117-PGE
AG-F-C1 Choice GR1	USCA-XXMB-0118-PGE	USCA-XXMB-0118-PGE
AG-F-C1 Prime Flat	USCA-XXMB-0119-PGE	USCA-XXMB-0119-PGE

AG-F-C1 Prime GR1	USCA-XXMB-0120-PGE	USCA-XXMB-0120-PGE
AG-F-C2 Choice Flat	USCA-XXMB-0121-PGE	USCA-XXMB-0121-PGE
AG-F-C2 Choice GR1	USCA-XXMB-0122-PGE	USCA-XXMB-0122-PGE
AG-F-C2 Prime Flat	USCA-XXMB-0123-PGE	USCA-XXMB-0123-PGE
AG-F-C2 Prime GR1	USCA-XXMB-0124-PGE	USCA-XXMB-0124-PGE
AG-F-C3 Choice Flat	USCA-XXMB-0125-PGE	USCA-XXMB-0125-PGE
AG-F-C3 Choice GR1	USCA-XXMB-0126-PGE	USCA-XXMB-0126-PGE
AG-F-C3 Prime Flat	USCA-XXMB-0127-PGE	USCA-XXMB-0127-PGE
AG-F-C3 Prime GR1	USCA-XXMB-0128-PGE	USCA-XXMB-0128-PGE
AG-R-A Choice Flat	USCA-XXMB-0129-PGE	USCA-XXMB-0129-PGE
AG-R-A Choice GR1	USCA-XXMB-0130-PGE	USCA-XXMB-0130-PGE
AG-R-A Prime Flat	USCA-XXMB-0131-PGE	USCA-XXMB-0131-PGE
AG-R-A Prime GR1	USCA-XXMB-0132-PGE	USCA-XXMB-0132-PGE
AG-R-B-P Choice Flat	USCA-XXMB-0133-PGE	USCA-XXMB-0133-PGE
AG-R-B-P Choice GR1	USCA-XXMB-0134-PGE	USCA-XXMB-0134-PGE
AG-R-B-P Prime Flat	USCA-XXMB-0135-PGE	USCA-XXMB-0135-PGE
AG-R-B-P Prime GR1	USCA-XXMB-0136-PGE	USCA-XXMB-0136-PGE
AG-R-B-S Choice Flat	USCA-XXMB-0137-PGE	USCA-XXMB-0137-PGE
AG-R-B-S Choice GR1	USCA-XXMB-0138-PGE	USCA-XXMB-0138-PGE
AG-R-B-S Prime Flat	USCA-XXMB-0139-PGE	USCA-XXMB-0139-PGE
AG-R-B-S Prime GR1	USCA-XXMB-0140-PGE	USCA-XXMB-0140-PGE
AG-R-B-T Choice Flat	USCA-XXMB-0141-PGE	USCA-XXMB-0141-PGE
AG-R-B-T Choice GR1	USCA-XXMB-0142-PGE	USCA-XXMB-0142-PGE
AG-R-B-T Prime Flat	USCA-XXMB-0143-PGE	USCA-XXMB-0143-PGE
AG-R-B-T Prime GR1	USCA-XXMB-0144-PGE	USCA-XXMB-0144-PGE
AG-V-A Choice Flat	USCA-XXMB-0145-PGE	USCA-XXMB-0145-PGE
AG-V-A Choice GR1	USCA-XXMB-0146-PGE	USCA-XXMB-0146-PGE
AG-V-A Prime Flat	USCA-XXMB-0147-PGE	USCA-XXMB-0147-PGE
AG-V-A Prime GR1	USCA-XXMB-0148-PGE	USCA-XXMB-0148-PGE
AG-V-B-P Choice Flat	USCA-XXMB-0149-PGE	USCA-XXMB-0149-PGE
AG-V-B-P Choice GR1	USCA-XXMB-0150-PGE	USCA-XXMB-0150-PGE
AG-V-B-P Prime Flat	USCA-XXMB-0151-PGE	USCA-XXMB-0151-PGE
AG-V-B-P Prime GR1	USCA-XXMB-0152-PGE	USCA-XXMB-0152-PGE
AG-V-B-S Choice Flat	USCA-XXMB-0153-PGE	USCA-XXMB-0153-PGE
AG-V-B-S Choice GR1	USCA-XXMB-0154-PGE	USCA-XXMB-0154-PGE
AG-V-B-S Prime Flat	USCA-XXMB-0155-PGE	USCA-XXMB-0155-PGE
AG-V-B-S Prime GR1	USCA-XXMB-0156-PGE	USCA-XXMB-0156-PGE
AG-V-B-T Choice Flat	USCA-XXMB-0157-PGE	USCA-XXMB-0157-PGE
AG-V-B-T Choice GR1	USCA-XXMB-0158-PGE	USCA-XXMB-0158-PGE
AG-V-B-T Prime Flat	USCA-XXMB-0159-PGE	USCA-XXMB-0159-PGE
AG-V-B-T Prime GR1	USCA-XXMB-0160-PGE	USCA-XXMB-0160-PGE

B-1 Choice Flat	USCA-XXMB-0161-PGE	USCA-XXMB-0161-PGE
B-1 Choice GR1	USCA-XXMB-0162-PGE	USCA-XXMB-0162-PGE
B-1 Prime Flat	USCA-XXMB-0163-PGE	USCA-XXMB-0163-PGE
B-1 Prime GR1	USCA-XXMB-0164-PGE	USCA-XXMB-0164-PGE
B-1-ST Choice Flat	USCA-XXMB-0165-PGE	USCA-XXMB-0165-PGE
B-1-ST Choice GR1	USCA-XXMB-0166-PGE	USCA-XXMB-0166-PGE
B-1-ST Prime Flat	USCA-XXMB-0167-PGE	USCA-XXMB-0167-PGE
B-1-ST Prime GR1	USCA-XXMB-0168-PGE	USCA-XXMB-0168-PGE
B-10-P Choice Flat	USCA-XXMB-0169-PGE	USCA-XXMB-0169-PGE
B-10-P Choice GR1	USCA-XXMB-0170-PGE	USCA-XXMB-0170-PGE
B-10-P Prime Flat	USCA-XXMB-0171-PGE	USCA-XXMB-0171-PGE
B-10-P Prime GR1	USCA-XXMB-0172-PGE	USCA-XXMB-0172-PGE
B-10-S Choice Flat	USCA-XXMB-0173-PGE	USCA-XXMB-0173-PGE
B-10-S Choice GR1	USCA-XXMB-0174-PGE	USCA-XXMB-0174-PGE
B-10-S Prime Flat	USCA-XXMB-0175-PGE	USCA-XXMB-0175-PGE
B-10-S Prime GR1	USCA-XXMB-0176-PGE	USCA-XXMB-0176-PGE
B-10-T Choice Flat	USCA-XXMB-0177-PGE	USCA-XXMB-0177-PGE
B-10-T Choice GR1	USCA-XXMB-0178-PGE	USCA-XXMB-0178-PGE
B-10-T Prime Flat	USCA-XXMB-0179-PGE	USCA-XXMB-0179-PGE
B-10-T Prime GR1	USCA-XXMB-0180-PGE	USCA-XXMB-0180-PGE
B-19-P Choice Flat	USCA-XXMB-0181-PGE	USCA-XXMB-0181-PGE
B-19-P Choice GR1	USCA-XXMB-0182-PGE	USCA-XXMB-0182-PGE
B-19-P Prime Flat	USCA-XXMB-0183-PGE	USCA-XXMB-0183-PGE
B-19-P Prime GR1	USCA-XXMB-0184-PGE	USCA-XXMB-0184-PGE
B-19-R-P Choice Flat	USCA-XXMB-0185-PGE	USCA-XXMB-0185-PGE
B-19-R-P Choice GR1	USCA-XXMB-0186-PGE	USCA-XXMB-0186-PGE
B-19-R-P Prime Flat	USCA-XXMB-0187-PGE	USCA-XXMB-0187-PGE
B-19-R-P Prime GR1	USCA-XXMB-0188-PGE	USCA-XXMB-0188-PGE
B-19-R-S Choice Flat	USCA-XXMB-0189-PGE	USCA-XXMB-0189-PGE
B-19-R-S Choice GR1	USCA-XXMB-0190-PGE	USCA-XXMB-0190-PGE
B-19-R-S Prime Flat	USCA-XXMB-0191-PGE	USCA-XXMB-0191-PGE
B-19-R-S Prime GR1	USCA-XXMB-0192-PGE	USCA-XXMB-0192-PGE
B-19-R-T Choice Flat	USCA-XXMB-0193-PGE	USCA-XXMB-0193-PGE
B-19-R-T Choice GR1	USCA-XXMB-0194-PGE	USCA-XXMB-0194-PGE
B-19-R-T Prime Flat	USCA-XXMB-0195-PGE	USCA-XXMB-0195-PGE
B-19-R-T Prime GR1	USCA-XXMB-0196-PGE	USCA-XXMB-0196-PGE
B-19-S Choice Flat	USCA-XXMB-0197-PGE	USCA-XXMB-0197-PGE
B-19-S Choice GR1	USCA-XXMB-0198-PGE	USCA-XXMB-0198-PGE
B-19-S Prime Flat	USCA-XXMB-0199-PGE	USCA-XXMB-0199-PGE
B-19-S Prime GR1	USCA-XXMB-0200-PGE	USCA-XXMB-0200-PGE
B-19-S-P Choice Flat	USCA-XXMB-0201-PGE	USCA-XXMB-0201-PGE

B-19-S-P Choice GR1	USCA-XXMB-0202-PGE	USCA-XXMB-0202-PGE
B-19-S-P Prime Flat	USCA-XXMB-0203-PGE	USCA-XXMB-0203-PGE
B-19-S-P Prime GR1	USCA-XXMB-0204-PGE	USCA-XXMB-0204-PGE
B-19-S-S Choice Flat	USCA-XXMB-0205-PGE	USCA-XXMB-0205-PGE
B-19-S-S Choice GR1	USCA-XXMB-0206-PGE	USCA-XXMB-0206-PGE
B-19-S-S Prime Flat	USCA-XXMB-0207-PGE	USCA-XXMB-0207-PGE
B-19-S-S Prime GR1	USCA-XXMB-0208-PGE	USCA-XXMB-0208-PGE
B-19-S-T Choice Flat	USCA-XXMB-0209-PGE	USCA-XXMB-0209-PGE
B-19-S-T Choice GR1	USCA-XXMB-0210-PGE	USCA-XXMB-0210-PGE
B-19-S-T Prime Flat	USCA-XXMB-0211-PGE	USCA-XXMB-0211-PGE
B-19-S-T Prime GR1	USCA-XXMB-0212-PGE	USCA-XXMB-0212-PGE
B-19-T Choice Flat	USCA-XXMB-0213-PGE	USCA-XXMB-0213-PGE
B-19-T Choice GR1	USCA-XXMB-0214-PGE	USCA-XXMB-0214-PGE
B-19-T Prime Flat	USCA-XXMB-0215-PGE	USCA-XXMB-0215-PGE
B-19-T Prime GR1	USCA-XXMB-0216-PGE	USCA-XXMB-0216-PGE
B-20-P Choice Flat	USCA-XXMB-0217-PGE	USCA-XXMB-0217-PGE
B-20-P Choice GR1	USCA-XXMB-0218-PGE	USCA-XXMB-0218-PGE
B-20-P Prime Flat	USCA-XXMB-0219-PGE	USCA-XXMB-0219-PGE
B-20-P Prime GR1	USCA-XXMB-0220-PGE	USCA-XXMB-0220-PGE
B-20-R-P Choice Flat	USCA-XXMB-0221-PGE	USCA-XXMB-0221-PGE
B-20-R-P Choice GR1	USCA-XXMB-0222-PGE	USCA-XXMB-0222-PGE
B-20-R-P Prime Flat	USCA-XXMB-0223-PGE	USCA-XXMB-0223-PGE
B-20-R-P Prime GR1	USCA-XXMB-0224-PGE	USCA-XXMB-0224-PGE
B-20-R-S Choice Flat	USCA-XXMB-0225-PGE	USCA-XXMB-0225-PGE
B-20-R-S Choice GR1	USCA-XXMB-0226-PGE	USCA-XXMB-0226-PGE
B-20-R-S Prime Flat	USCA-XXMB-0227-PGE	USCA-XXMB-0227-PGE
B-20-R-S Prime GR1	USCA-XXMB-0228-PGE	USCA-XXMB-0228-PGE
B-20-R-T Choice Flat	USCA-XXMB-0229-PGE	USCA-XXMB-0229-PGE
B-20-R-T Choice GR1	USCA-XXMB-0230-PGE	USCA-XXMB-0230-PGE
B-20-R-T Prime Flat	USCA-XXMB-0231-PGE	USCA-XXMB-0231-PGE
B-20-R-T Prime GR1	USCA-XXMB-0232-PGE	USCA-XXMB-0232-PGE
B-20-S Choice Flat	USCA-XXMB-0233-PGE	USCA-XXMB-0233-PGE
B-20-S Choice GR1	USCA-XXMB-0234-PGE	USCA-XXMB-0234-PGE
B-20-S Prime Flat	USCA-XXMB-0235-PGE	USCA-XXMB-0235-PGE
B-20-S Prime GR1	USCA-XXMB-0236-PGE	USCA-XXMB-0236-PGE
B-20-S-P Choice Flat	USCA-XXMB-0237-PGE	USCA-XXMB-0237-PGE
B-20-S-P Choice GR1	USCA-XXMB-0238-PGE	USCA-XXMB-0238-PGE
B-20-S-P Prime Flat	USCA-XXMB-0239-PGE	USCA-XXMB-0239-PGE
B-20-S-P Prime GR1	USCA-XXMB-0240-PGE	USCA-XXMB-0240-PGE
B-20-S-S Choice Flat	USCA-XXMB-0241-PGE	USCA-XXMB-0241-PGE
B-20-S-S Choice GR1	USCA-XXMB-0242-PGE	USCA-XXMB-0242-PGE

B-20-S-S Prime Flat	USCA-XXMB-0243-PGE	USCA-XXMB-0243-PGE
B-20-S-S Prime GR1	USCA-XXMB-0244-PGE	USCA-XXMB-0244-PGE
B-20-S-T Choice Flat	USCA-XXMB-0245-PGE	USCA-XXMB-0245-PGE
B-20-S-T Choice GR1	USCA-XXMB-0246-PGE	USCA-XXMB-0246-PGE
B-20-S-T Prime Flat	USCA-XXMB-0247-PGE	USCA-XXMB-0247-PGE
B-20-S-T Prime GR1	USCA-XXMB-0248-PGE	USCA-XXMB-0248-PGE
B-20-T Choice Flat	USCA-XXMB-0249-PGE	USCA-XXMB-0249-PGE
B-20-T Choice GR1	USCA-XXMB-0250-PGE	USCA-XXMB-0250-PGE
B-20-T Prime Flat	USCA-XXMB-0251-PGE	USCA-XXMB-0251-PGE
B-20-T Prime GR1	USCA-XXMB-0252-PGE	USCA-XXMB-0252-PGE
B-6 Choice Flat	USCA-XXMB-0253-PGE	USCA-XXMB-0253-PGE
B-6 Choice GR1	USCA-XXMB-0254-PGE	USCA-XXMB-0254-PGE
B-6 Prime Flat	USCA-XXMB-0255-PGE	USCA-XXMB-0255-PGE
B-6 Prime GR1	USCA-XXMB-0256-PGE	USCA-XXMB-0256-PGE
B-EV-1 Choice Flat	USCA-XXMB-0257-PGE	USCA-XXMB-0257-PGE
B-EV-1 Choice GR1	USCA-XXMB-0258-PGE	USCA-XXMB-0258-PGE
B-EV-1 Prime Flat	USCA-XXMB-0259-PGE	USCA-XXMB-0259-PGE
B-EV-1 Prime GR1	USCA-XXMB-0260-PGE	USCA-XXMB-0260-PGE
B-EV-2-P Choice Flat	USCA-XXMB-0261-PGE	USCA-XXMB-0261-PGE
B-EV-2-P Choice GR1	USCA-XXMB-0262-PGE	USCA-XXMB-0262-PGE
B-EV-2-P Prime Flat	USCA-XXMB-0263-PGE	USCA-XXMB-0263-PGE
B-EV-2-P Prime GR1	USCA-XXMB-0264-PGE	USCA-XXMB-0264-PGE
B-EV-2-S Choice Flat	USCA-XXMB-0265-PGE	USCA-XXMB-0265-PGE
B-EV-2-S Choice GR1	USCA-XXMB-0266-PGE	USCA-XXMB-0266-PGE
B-EV-2-S Prime Flat	USCA-XXMB-0267-PGE	USCA-XXMB-0267-PGE
B-EV-2-S Prime GR1	USCA-XXMB-0268-PGE	USCA-XXMB-0268-PGE
E-19-P Choice Flat	USCA-XXMB-0269-PGE	USCA-XXMB-0269-PGE
E-19-P Choice GR1	USCA-XXMB-0270-PGE	USCA-XXMB-0270-PGE
E-19-P Prime Flat	USCA-XXMB-0271-PGE	USCA-XXMB-0271-PGE
E-19-P Prime GR1	USCA-XXMB-0272-PGE	USCA-XXMB-0272-PGE
E-19-R-P Choice Flat	USCA-XXMB-0273-PGE	USCA-XXMB-0273-PGE
E-19-R-P Choice GR1	USCA-XXMB-0274-PGE	USCA-XXMB-0274-PGE
E-19-R-P Prime Flat	USCA-XXMB-0275-PGE	USCA-XXMB-0275-PGE
E-19-R-P Prime GR1	USCA-XXMB-0276-PGE	USCA-XXMB-0276-PGE
E-19-R-S Choice Flat	USCA-XXMB-0277-PGE	USCA-XXMB-0277-PGE
E-19-R-S Choice GR1	USCA-XXMB-0278-PGE	USCA-XXMB-0278-PGE
E-19-R-S Prime Flat	USCA-XXMB-0279-PGE	USCA-XXMB-0279-PGE
E-19-R-S Prime GR1	USCA-XXMB-0280-PGE	USCA-XXMB-0280-PGE
E-19-R-T Choice Flat	USCA-XXMB-0281-PGE	USCA-XXMB-0281-PGE
E-19-R-T Choice GR1	USCA-XXMB-0282-PGE	USCA-XXMB-0282-PGE
E-19-R-T Prime Flat	USCA-XXMB-0283-PGE	USCA-XXMB-0283-PGE

E-19-R-T Prime GR1	USCA-XXMB-0284-PGE	USCA-XXMB-0284-PGE
E-19-S Choice Flat	USCA-XXMB-0285-PGE	USCA-XXMB-0285-PGE
E-19-S Choice GR1	USCA-XXMB-0286-PGE	USCA-XXMB-0286-PGE
E-19-S Prime Flat	USCA-XXMB-0287-PGE	USCA-XXMB-0287-PGE
E-19-S Prime GR1	USCA-XXMB-0288-PGE	USCA-XXMB-0288-PGE
E-19-T Choice Flat	USCA-XXMB-0289-PGE	USCA-XXMB-0289-PGE
E-19-T Choice GR1	USCA-XXMB-0290-PGE	USCA-XXMB-0290-PGE
E-19-T Prime Flat	USCA-XXMB-0291-PGE	USCA-XXMB-0291-PGE
E-19-T Prime GR1	USCA-XXMB-0292-PGE	USCA-XXMB-0292-PGE
E-20-P Choice Flat	USCA-XXMB-0293-PGE	USCA-XXMB-0293-PGE
E-20-P Choice GR1	USCA-XXMB-0294-PGE	USCA-XXMB-0294-PGE
E-20-P Prime Flat	USCA-XXMB-0295-PGE	USCA-XXMB-0295-PGE
E-20-P Prime GR1	USCA-XXMB-0296-PGE	USCA-XXMB-0296-PGE
E-20-R-P Choice Flat	USCA-XXMB-0297-PGE	USCA-XXMB-0297-PGE
E-20-R-P Choice GR1	USCA-XXMB-0298-PGE	USCA-XXMB-0298-PGE
E-20-R-P Prime Flat	USCA-XXMB-0299-PGE	USCA-XXMB-0299-PGE
E-20-R-P Prime GR1	USCA-XXMB-0300-PGE	USCA-XXMB-0300-PGE
E-20-R-S Choice Flat	USCA-XXMB-0301-PGE	USCA-XXMB-0301-PGE
E-20-R-S Choice GR1	USCA-XXMB-0302-PGE	USCA-XXMB-0302-PGE
E-20-R-S Prime Flat	USCA-XXMB-0303-PGE	USCA-XXMB-0303-PGE
E-20-R-S Prime GR1	USCA-XXMB-0304-PGE	USCA-XXMB-0304-PGE
E-20-R-T Choice Flat	USCA-XXMB-0305-PGE	USCA-XXMB-0305-PGE
E-20-R-T Choice GR1	USCA-XXMB-0306-PGE	USCA-XXMB-0306-PGE
E-20-R-T Prime Flat	USCA-XXMB-0307-PGE	USCA-XXMB-0307-PGE
E-20-R-T Prime GR1	USCA-XXMB-0308-PGE	USCA-XXMB-0308-PGE
E-20-S Choice Flat	USCA-XXMB-0309-PGE	USCA-XXMB-0309-PGE
E-20-S Choice GR1	USCA-XXMB-0310-PGE	USCA-XXMB-0310-PGE
E-20-S Prime Flat	USCA-XXMB-0311-PGE	USCA-XXMB-0311-PGE
E-20-S Prime GR1	USCA-XXMB-0312-PGE	USCA-XXMB-0312-PGE
E-20-T Choice Flat	USCA-XXMB-0313-PGE	USCA-XXMB-0313-PGE
E-20-T Choice GR1	USCA-XXMB-0314-PGE	USCA-XXMB-0314-PGE
E-20-T Prime Flat	USCA-XXMB-0315-PGE	USCA-XXMB-0315-PGE
E-20-T Prime GR1	USCA-XXMB-0316-PGE	USCA-XXMB-0316-PGE
E-6 Choice Flat	USCA-XXMB-0317-PGE	USCA-XXMB-0317-PGE
E-6 Choice GR1	USCA-XXMB-0318-PGE	USCA-XXMB-0318-PGE
E-6 Prime Flat	USCA-XXMB-0319-PGE	USCA-XXMB-0319-PGE
E-6 Prime GR1	USCA-XXMB-0320-PGE	USCA-XXMB-0320-PGE
E-ELEC Choice Flat	USCA-XXMB-0321-PGE	USCA-XXMB-0321-PGE
E-ELEC Choice GR1	USCA-XXMB-0322-PGE	USCA-XXMB-0322-PGE
E-ELEC Prime Flat	USCA-XXMB-0323-PGE	USCA-XXMB-0323-PGE
E-ELEC Prime GR1	USCA-XXMB-0324-PGE	USCA-XXMB-0324-PGE

E-EV Choice Flat	USCA-XXMB-0325-PGE	USCA-XXMB-0325-PGE
E-EV Choice GR1	USCA-XXMB-0326-PGE	USCA-XXMB-0326-PGE
E-EV Prime Flat	USCA-XXMB-0327-PGE	USCA-XXMB-0327-PGE
E-EV Prime GR1	USCA-XXMB-0328-PGE	USCA-XXMB-0328-PGE
E-EV2-A Choice Flat	USCA-XXMB-0329-PGE	USCA-XXMB-0329-PGE
E-EV2-A Choice GR1	USCA-XXMB-0330-PGE	USCA-XXMB-0330-PGE
E-EV2-A Prime Flat	USCA-XXMB-0331-PGE	USCA-XXMB-0331-PGE
E-EV2-A Prime GR1	USCA-XXMB-0332-PGE	USCA-XXMB-0332-PGE
E-TOU-B Choice Flat	USCA-XXMB-0333-PGE	USCA-XXMB-0333-PGE
E-TOU-B Choice GR1	USCA-XXMB-0334-PGE	USCA-XXMB-0334-PGE
E-TOU-B Prime Flat	USCA-XXMB-0335-PGE	USCA-XXMB-0335-PGE
E-TOU-B Prime GR1	USCA-XXMB-0336-PGE	USCA-XXMB-0336-PGE
E-TOU-C Choice Flat	USCA-XXMB-0337-PGE	USCA-XXMB-0337-PGE
E-TOU-C Choice GR1	USCA-XXMB-0338-PGE	USCA-XXMB-0338-PGE
E-TOU-C Prime Flat	USCA-XXMB-0339-PGE	USCA-XXMB-0339-PGE
E-TOU-C Prime GR1	USCA-XXMB-0340-PGE	USCA-XXMB-0340-PGE
E-TOU-D Choice Flat	USCA-XXMB-0341-PGE	USCA-XXMB-0341-PGE
E-TOU-D Choice GR1	USCA-XXMB-0342-PGE	USCA-XXMB-0342-PGE
E-TOU-D Prime Flat	USCA-XXMB-0343-PGE	USCA-XXMB-0343-PGE
E-TOU-D Prime GR1	USCA-XXMB-0344-PGE	USCA-XXMB-0344-PGE
S-B-P Choice Flat	USCA-XXMB-0345-PGE	USCA-XXMB-0345-PGE
S-B-P Choice GR1	USCA-XXMB-0346-PGE	USCA-XXMB-0346-PGE
S-B-P Prime Flat	USCA-XXMB-0347-PGE	USCA-XXMB-0347-PGE
S-B-P Prime GR1	USCA-XXMB-0348-PGE	USCA-XXMB-0348-PGE
S-B-S Choice Flat	USCA-XXMB-0349-PGE	USCA-XXMB-0349-PGE
S-B-S Choice GR1	USCA-XXMB-0350-PGE	USCA-XXMB-0350-PGE
S-B-S Prime Flat	USCA-XXMB-0351-PGE	USCA-XXMB-0351-PGE
S-B-S Prime GR1	USCA-XXMB-0352-PGE	USCA-XXMB-0352-PGE
S-B-T Choice Flat	USCA-XXMB-0353-PGE	USCA-XXMB-0353-PGE
S-B-T Choice GR1	USCA-XXMB-0354-PGE	USCA-XXMB-0354-PGE
S-B-T Prime Flat	USCA-XXMB-0355-PGE	USCA-XXMB-0355-PGE
S-B-T Prime GR1	USCA-XXMB-0356-PGE	USCA-XXMB-0356-PGE
S-TOU-P Choice Flat	USCA-XXMB-0357-PGE	USCA-XXMB-0357-PGE
S-TOU-P Choice GR1	USCA-XXMB-0358-PGE	USCA-XXMB-0358-PGE
S-TOU-P Prime Flat	USCA-XXMB-0359-PGE	USCA-XXMB-0359-PGE
S-TOU-P Prime GR1	USCA-XXMB-0360-PGE	USCA-XXMB-0360-PGE
S-TOU-S Choice Flat	USCA-XXMB-0361-PGE	USCA-XXMB-0361-PGE
S-TOU-S Choice GR1	USCA-XXMB-0362-PGE	USCA-XXMB-0362-PGE
S-TOU-S Prime Flat	USCA-XXMB-0363-PGE	USCA-XXMB-0363-PGE
S-TOU-S Prime GR1	USCA-XXMB-0364-PGE	USCA-XXMB-0364-PGE
S-TOU-T Choice Flat	USCA-XXMB-0365-PGE	USCA-XXMB-0365-PGE

S-TOU-T Choice GR1	USCA-XXMB-0366-PGE	USCA-XXMB-0366-PGE
S-TOU-T Prime Flat	USCA-XXMB-0367-PGE	USCA-XXMB-0367-PGE
S-TOU-T Prime GR1	USCA-XXMB-0368-PGE	USCA-XXMB-0368-PGE
AL-2-GF	USCA-XXMB-0001-SCE	USCA-XXMB-0001-SCE
TOU-8-PRI-B	USCA-XXMB-0002-SCE	USCA-XXMB-0002-SCE
TOU-8-PRI-D	USCA-XXMB-0003-SCE	USCA-XXMB-0003-SCE
TOU-8-PRI-E	USCA-XXMB-0004-SCE	USCA-XXMB-0004-SCE
TOU-8-PRI-R	USCA-XXMB-0005-SCE	USCA-XXMB-0005-SCE
TOU-8-PRI-RBU	USCA-XXMB-0006-SCE	USCA-XXMB-0006-SCE
TOU-8-SEC-B	USCA-XXMB-0007-SCE	USCA-XXMB-0007-SCE
TOU-8-SEC-D	USCA-XXMB-0008-SCE	USCA-XXMB-0008-SCE
TOU-8-SEC-E	USCA-XXMB-0009-SCE	USCA-XXMB-0009-SCE
TOU-8-SEC-R	USCA-XXMB-0010-SCE	USCA-XXMB-0010-SCE
TOU-8-SEC-RBU	USCA-XXMB-0011-SCE	USCA-XXMB-0011-SCE
TOU-8-SUB-B	USCA-XXMB-0012-SCE	USCA-XXMB-0012-SCE
TOU-8-SUB-D	USCA-XXMB-0013-SCE	USCA-XXMB-0013-SCE
TOU-8-SUB-E	USCA-XXMB-0014-SCE	USCA-XXMB-0014-SCE
TOU-8-SUB-R	USCA-XXMB-0015-SCE	USCA-XXMB-0015-SCE
TOU-8-SUB-RBU	USCA-XXMB-0016-SCE	USCA-XXMB-0016-SCE
TOU-8-TRS-B	USCA-XXMB-0017-SCE	USCA-XXMB-0017-SCE
TOU-8-TRS-D	USCA-XXMB-0018-SCE	USCA-XXMB-0018-SCE
TOU-8-TRS-E	USCA-XXMB-0019-SCE	USCA-XXMB-0019-SCE
TOU-8-TRS-R	USCA-XXMB-0020-SCE	USCA-XXMB-0020-SCE
TOU-8-TRS-RBU	USCA-XXMB-0021-SCE	USCA-XXMB-0021-SCE
TOU-D-4	USCA-XXMB-0022-SCE	USCA-XXMB-0022-SCE
TOU-D-5	USCA-XXMB-0023-SCE	USCA-XXMB-0023-SCE
TOU-D-A	USCA-XXMB-0024-SCE	USCA-XXMB-0024-SCE
TOU-D-B	USCA-XXMB-0025-SCE	USCA-XXMB-0025-SCE
TOU-D-PRIME	USCA-XXMB-0026-SCE	USCA-XXMB-0026-SCE
TOU-D-T	USCA-XXMB-0027-SCE	USCA-XXMB-0027-SCE
TOU-EV-1	USCA-XXMB-0028-SCE	USCA-XXMB-0028-SCE
TOU-EV-7-PRI	USCA-XXMB-0029-SCE	USCA-XXMB-0029-SCE
TOU-EV-7-SEC	USCA-XXMB-0030-SCE	USCA-XXMB-0030-SCE
TOU-EV-7-SUB	USCA-XXMB-0031-SCE	USCA-XXMB-0031-SCE
TOU-EV-7-TRS	USCA-XXMB-0032-SCE	USCA-XXMB-0032-SCE
TOU-EV-8-PRI	USCA-XXMB-0033-SCE	USCA-XXMB-0033-SCE
TOU-EV-8-SEC	USCA-XXMB-0034-SCE	USCA-XXMB-0034-SCE
TOU-EV-8-SUB	USCA-XXMB-0035-SCE	USCA-XXMB-0035-SCE
TOU-EV-8-TRS	USCA-XXMB-0036-SCE	USCA-XXMB-0036-SCE
TOU-EV-9-PRI	USCA-XXMB-0037-SCE	USCA-XXMB-0037-SCE
TOU-EV-9-SEC	USCA-XXMB-0038-SCE	USCA-XXMB-0038-SCE

TOU-EV-9-SUB	USCA-XXMB-0039-SCE	USCA-XXMB-0039-SCE
TOU-EV-9-TRS	USCA-XXMB-0040-SCE	USCA-XXMB-0040-SCE
TOU-GS-1-A	USCA-XXMB-0041-SCE	USCA-XXMB-0041-SCE
TOU-GS-1-B	USCA-XXMB-0042-SCE	USCA-XXMB-0042-SCE
TOU-GS-1-PRI-D	USCA-XXMB-0043-SCE	USCA-XXMB-0043-SCE
TOU-GS-1-PRI-E	USCA-XXMB-0044-SCE	USCA-XXMB-0044-SCE
TOU-GS-1-PRI-ES	USCA-XXMB-0045-SCE	USCA-XXMB-0045-SCE
TOU-GS-1-SEC-D	USCA-XXMB-0046-SCE	USCA-XXMB-0046-SCE
TOU-GS-1-SEC-E	USCA-XXMB-0047-SCE	USCA-XXMB-0047-SCE
TOU-GS-1-SEC-ES	USCA-XXMB-0048-SCE	USCA-XXMB-0048-SCE
TOU-GS-1-SUB-D	USCA-XXMB-0049-SCE	USCA-XXMB-0049-SCE
TOU-GS-1-SUB-E	USCA-XXMB-0050-SCE	USCA-XXMB-0050-SCE
TOU-GS-1-SUB-ES	USCA-XXMB-0051-SCE	USCA-XXMB-0051-SCE
TOU-GS-1-TRS-D	USCA-XXMB-0052-SCE	USCA-XXMB-0052-SCE
TOU-GS-1-TRS-E	USCA-XXMB-0053-SCE	USCA-XXMB-0053-SCE
TOU-GS-1-TRS-ES	USCA-XXMB-0054-SCE	USCA-XXMB-0054-SCE
TOU-GS-2-B	USCA-XXMB-0055-SCE	USCA-XXMB-0055-SCE
TOU-GS-2-PRI-D	USCA-XXMB-0056-SCE	USCA-XXMB-0056-SCE
TOU-GS-2-PRI-E	USCA-XXMB-0057-SCE	USCA-XXMB-0057-SCE
TOU-GS-2-R	USCA-XXMB-0058-SCE	USCA-XXMB-0058-SCE
TOU-GS-2-SEC-D	USCA-XXMB-0059-SCE	USCA-XXMB-0059-SCE
TOU-GS-2-SEC-E	USCA-XXMB-0060-SCE	USCA-XXMB-0060-SCE
TOU-GS-2-SUB-D	USCA-XXMB-0061-SCE	USCA-XXMB-0061-SCE
TOU-GS-2-SUB-E	USCA-XXMB-0062-SCE	USCA-XXMB-0062-SCE
TOU-GS-2-TRS-D	USCA-XXMB-0063-SCE	USCA-XXMB-0063-SCE
TOU-GS-2-TRS-E	USCA-XXMB-0064-SCE	USCA-XXMB-0064-SCE
TOU-GS-3-B	USCA-XXMB-0065-SCE	USCA-XXMB-0065-SCE
TOU-GS-3-PRI-D	USCA-XXMB-0066-SCE	USCA-XXMB-0066-SCE
TOU-GS-3-PRI-E	USCA-XXMB-0067-SCE	USCA-XXMB-0067-SCE
TOU-GS-3-R	USCA-XXMB-0068-SCE	USCA-XXMB-0068-SCE
TOU-GS-3-SEC-D	USCA-XXMB-0069-SCE	USCA-XXMB-0069-SCE
TOU-GS-3-SEC-E	USCA-XXMB-0070-SCE	USCA-XXMB-0070-SCE
TOU-GS-3-SUB-D	USCA-XXMB-0071-SCE	USCA-XXMB-0071-SCE
TOU-GS-3-SUB-E	USCA-XXMB-0072-SCE	USCA-XXMB-0072-SCE
TOU-GS-3-TRS-D	USCA-XXMB-0073-SCE	USCA-XXMB-0073-SCE
TOU-GS-3-TRS-E	USCA-XXMB-0074-SCE	USCA-XXMB-0074-SCE
TOU-PA-2-A	USCA-XXMB-0075-SCE	USCA-XXMB-0075-SCE
TOU-PA-2-B	USCA-XXMB-0076-SCE	USCA-XXMB-0076-SCE
TOU-PA-2-PRI-D	USCA-XXMB-0077-SCE	USCA-XXMB-0077-SCE
TOU-PA-2-PRI-D5	USCA-XXMB-0078-SCE	USCA-XXMB-0078-SCE
TOU-PA-2-PRI-E	USCA-XXMB-0079-SCE	USCA-XXMB-0079-SCE

TOU-PA-2-PRI-E5	USCA-XXMB-0080-SCE	USCA-XXMB-0080-SCE
TOU-PA-2-SEC-D	USCA-XXMB-0081-SCE	USCA-XXMB-0081-SCE
TOU-PA-2-SEC-D5	USCA-XXMB-0082-SCE	USCA-XXMB-0082-SCE
TOU-PA-2-SEC-E	USCA-XXMB-0083-SCE	USCA-XXMB-0083-SCE
TOU-PA-2-SEC-E5	USCA-XXMB-0084-SCE	USCA-XXMB-0084-SCE
TOU-PA-2-SUB-D	USCA-XXMB-0085-SCE	USCA-XXMB-0085-SCE
TOU-PA-2-SUB-D5	USCA-XXMB-0086-SCE	USCA-XXMB-0086-SCE
TOU-PA-2-SUB-E	USCA-XXMB-0087-SCE	USCA-XXMB-0087-SCE
TOU-PA-2-SUB-E5	USCA-XXMB-0088-SCE	USCA-XXMB-0088-SCE
TOU-PA-2-TRS-D	USCA-XXMB-0089-SCE	USCA-XXMB-0089-SCE
TOU-PA-2-TRS-D5	USCA-XXMB-0090-SCE	USCA-XXMB-0090-SCE
TOU-PA-2-TRS-E	USCA-XXMB-0091-SCE	USCA-XXMB-0091-SCE
TOU-PA-2-TRS-E5	USCA-XXMB-0092-SCE	USCA-XXMB-0092-SCE
TOU-PA-3-A	USCA-XXMB-0093-SCE	USCA-XXMB-0093-SCE
TOU-PA-3-B	USCA-XXMB-0094-SCE	USCA-XXMB-0094-SCE
TOU-PA-3-PRI-D	USCA-XXMB-0095-SCE	USCA-XXMB-0095-SCE
TOU-PA-3-PRI-D5	USCA-XXMB-0096-SCE	USCA-XXMB-0096-SCE
TOU-PA-3-PRI-E	USCA-XXMB-0097-SCE	USCA-XXMB-0097-SCE
TOU-PA-3-PRI-E5	USCA-XXMB-0098-SCE	USCA-XXMB-0098-SCE
TOU-PA-3-SEC-D	USCA-XXMB-0099-SCE	USCA-XXMB-0099-SCE
TOU-PA-3-SEC-D5	USCA-XXMB-0100-SCE	USCA-XXMB-0100-SCE
TOU-PA-3-SEC-E	USCA-XXMB-0101-SCE	USCA-XXMB-0101-SCE
TOU-PA-3-SEC-E5	USCA-XXMB-0102-SCE	USCA-XXMB-0102-SCE
TOU-PA-3-SUB-D	USCA-XXMB-0103-SCE	USCA-XXMB-0103-SCE
TOU-PA-3-SUB-D5	USCA-XXMB-0104-SCE	USCA-XXMB-0104-SCE
TOU-PA-3-SUB-E	USCA-XXMB-0105-SCE	USCA-XXMB-0105-SCE
TOU-PA-3-SUB-E5	USCA-XXMB-0106-SCE	USCA-XXMB-0106-SCE
TOU-PA-3-TRS-D	USCA-XXMB-0107-SCE	USCA-XXMB-0107-SCE
TOU-PA-3-TRS-D5	USCA-XXMB-0108-SCE	USCA-XXMB-0108-SCE
TOU-PA-3-TRS-E	USCA-XXMB-0109-SCE	USCA-XXMB-0109-SCE
TOU-PA-3-TRS-E5	USCA-XXMB-0110-SCE	USCA-XXMB-0110-SCE
AL-2-GF-3Cprime	USCA-XXMB-0111-SCE	USCA-XXMB-0111-SCE
TOU-8-PRI-B-3Cprime	USCA-XXMB-0112-SCE	USCA-XXMB-0112-SCE
TOU-8-PRI-D-3Cprime	USCA-XXMB-0113-SCE	USCA-XXMB-0113-SCE
TOU-8-PRI-E-3Cprime	USCA-XXMB-0114-SCE	USCA-XXMB-0114-SCE
TOU-8-PRI-R-3Cprime	USCA-XXMB-0115-SCE	USCA-XXMB-0115-SCE
TOU-8-PRI-RBU-3Cprime	USCA-XXMB-0116-SCE	USCA-XXMB-0116-SCE
TOU-8-SEC-B-3Cprime	USCA-XXMB-0117-SCE	USCA-XXMB-0117-SCE
TOU-8-SEC-D-3Cprime	USCA-XXMB-0118-SCE	USCA-XXMB-0118-SCE
TOU-8-SEC-E-3Cprime	USCA-XXMB-0119-SCE	USCA-XXMB-0119-SCE
TOU-8-SEC-R-3Cprime	USCA-XXMB-0120-SCE	USCA-XXMB-0120-SCE

TOU-8-SEC-RBU-3Cprime	USCA-XXMB-0121-SCE	USCA-XXMB-0121-SCE
TOU-8-SUB-B-3Cprime	USCA-XXMB-0122-SCE	USCA-XXMB-0122-SCE
TOU-8-SUB-D-3Cprime	USCA-XXMB-0123-SCE	USCA-XXMB-0123-SCE
TOU-8-SUB-E-3Cprime	USCA-XXMB-0124-SCE	USCA-XXMB-0124-SCE
TOU-8-SUB-R-3Cprime	USCA-XXMB-0125-SCE	USCA-XXMB-0125-SCE
TOU-8-SUB-RBU-3Cprime	USCA-XXMB-0126-SCE	USCA-XXMB-0126-SCE
TOU-8-TRS-B-3Cprime	USCA-XXMB-0127-SCE	USCA-XXMB-0127-SCE
TOU-8-TRS-D-3Cprime	USCA-XXMB-0128-SCE	USCA-XXMB-0128-SCE
TOU-8-TRS-E-3Cprime	USCA-XXMB-0129-SCE	USCA-XXMB-0129-SCE
TOU-8-TRS-R-3Cprime	USCA-XXMB-0130-SCE	USCA-XXMB-0130-SCE
TOU-8-TRS-RBU-3Cprime	USCA-XXMB-0131-SCE	USCA-XXMB-0131-SCE
TOU-D-4-3Cprime	USCA-XXMB-0132-SCE	USCA-XXMB-0132-SCE
TOU-D-5-3Cprime	USCA-XXMB-0133-SCE	USCA-XXMB-0133-SCE
TOU-D-A-3Cprime	USCA-XXMB-0134-SCE	USCA-XXMB-0134-SCE
TOU-D-B-3Cprime	USCA-XXMB-0135-SCE	USCA-XXMB-0135-SCE
TOU-D-PRIME-3Cprime	USCA-XXMB-0136-SCE	USCA-XXMB-0136-SCE
TOU-D-T-3Cprime	USCA-XXMB-0137-SCE	USCA-XXMB-0137-SCE
TOU-EV-1-3Cprime	USCA-XXMB-0138-SCE	USCA-XXMB-0138-SCE
TOU-EV-7-PRI-3Cprime	USCA-XXMB-0139-SCE	USCA-XXMB-0139-SCE
TOU-EV-7-SEC-3Cprime	USCA-XXMB-0140-SCE	USCA-XXMB-0140-SCE
TOU-EV-7-SUB-3Cprime	USCA-XXMB-0141-SCE	USCA-XXMB-0141-SCE
TOU-EV-7-TRS-3Cprime	USCA-XXMB-0142-SCE	USCA-XXMB-0142-SCE
TOU-EV-8-PRI-3Cprime	USCA-XXMB-0143-SCE	USCA-XXMB-0143-SCE
TOU-EV-8-SEC-3Cprime	USCA-XXMB-0144-SCE	USCA-XXMB-0144-SCE
TOU-EV-8-SUB-3Cprime	USCA-XXMB-0145-SCE	USCA-XXMB-0145-SCE
TOU-EV-8-TRS-3Cprime	USCA-XXMB-0146-SCE	USCA-XXMB-0146-SCE
TOU-EV-9-PRI-3Cprime	USCA-XXMB-0147-SCE	USCA-XXMB-0147-SCE
TOU-EV-9-SEC-3Cprime	USCA-XXMB-0148-SCE	USCA-XXMB-0148-SCE
TOU-EV-9-SUB-3Cprime	USCA-XXMB-0149-SCE	USCA-XXMB-0149-SCE
TOU-EV-9-TRS-3Cprime	USCA-XXMB-0150-SCE	USCA-XXMB-0150-SCE
TOU-GS-1-A-3Cprime	USCA-XXMB-0151-SCE	USCA-XXMB-0151-SCE
TOU-GS-1-B-3Cprime	USCA-XXMB-0152-SCE	USCA-XXMB-0152-SCE
TOU-GS-1-PRI-D-3Cprime	USCA-XXMB-0153-SCE	USCA-XXMB-0153-SCE
TOU-GS-1-PRI-E-3Cprime	USCA-XXMB-0154-SCE	USCA-XXMB-0154-SCE
TOU-GS-1-PRI-ES-3Cprime	USCA-XXMB-0155-SCE	USCA-XXMB-0155-SCE
TOU-GS-1-SEC-D-3Cprime	USCA-XXMB-0156-SCE	USCA-XXMB-0156-SCE
TOU-GS-1-SEC-E-3Cprime	USCA-XXMB-0157-SCE	USCA-XXMB-0157-SCE

TOU-GS-1-SEC-ES-3Cprime	USCA-XXMB-0158-SCE	USCA-XXMB-0158-SCE
TOU-GS-1-SUB-D-3Cprime	USCA-XXMB-0159-SCE	USCA-XXMB-0159-SCE
TOU-GS-1-SUB-E-3Cprime	USCA-XXMB-0160-SCE	USCA-XXMB-0160-SCE
TOU-GS-1-SUB-ES-3Cprime	USCA-XXMB-0161-SCE	USCA-XXMB-0161-SCE
TOU-GS-1-TRS-D-3Cprime	USCA-XXMB-0162-SCE	USCA-XXMB-0162-SCE
TOU-GS-1-TRS-E-3Cprime	USCA-XXMB-0163-SCE	USCA-XXMB-0163-SCE
TOU-GS-1-TRS-ES-3Cprime	USCA-XXMB-0164-SCE	USCA-XXMB-0164-SCE
TOU-GS-2-B-3Cprime	USCA-XXMB-0165-SCE	USCA-XXMB-0165-SCE
TOU-GS-2-PRI-D-3Cprime	USCA-XXMB-0166-SCE	USCA-XXMB-0166-SCE
TOU-GS-2-PRI-E-3Cprime	USCA-XXMB-0167-SCE	USCA-XXMB-0167-SCE
TOU-GS-2-R-3Cprime	USCA-XXMB-0168-SCE	USCA-XXMB-0168-SCE
TOU-GS-2-SEC-D-3Cprime	USCA-XXMB-0169-SCE	USCA-XXMB-0169-SCE
TOU-GS-2-SEC-E-3Cprime	USCA-XXMB-0170-SCE	USCA-XXMB-0170-SCE
TOU-GS-2-SUB-D-3Cprime	USCA-XXMB-0171-SCE	USCA-XXMB-0171-SCE
TOU-GS-2-SUB-E-3Cprime	USCA-XXMB-0172-SCE	USCA-XXMB-0172-SCE
TOU-GS-2-TRS-D-3Cprime	USCA-XXMB-0173-SCE	USCA-XXMB-0173-SCE
TOU-GS-2-TRS-E-3Cprime	USCA-XXMB-0174-SCE	USCA-XXMB-0174-SCE
TOU-GS-3-B-3Cprime	USCA-XXMB-0175-SCE	USCA-XXMB-0175-SCE
TOU-GS-3-PRI-D-3Cprime	USCA-XXMB-0176-SCE	USCA-XXMB-0176-SCE
TOU-GS-3-PRI-E-3Cprime	USCA-XXMB-0177-SCE	USCA-XXMB-0177-SCE
TOU-GS-3-R-3Cprime	USCA-XXMB-0178-SCE	USCA-XXMB-0178-SCE
TOU-GS-3-SEC-D-3Cprime	USCA-XXMB-0179-SCE	USCA-XXMB-0179-SCE
TOU-GS-3-SEC-E-3Cprime	USCA-XXMB-0180-SCE	USCA-XXMB-0180-SCE
TOU-GS-3-SUB-D-3Cprime	USCA-XXMB-0181-SCE	USCA-XXMB-0181-SCE
TOU-GS-3-SUB-E-3Cprime	USCA-XXMB-0182-SCE	USCA-XXMB-0182-SCE
TOU-GS-3-TRS-D-3Cprime	USCA-XXMB-0183-SCE	USCA-XXMB-0183-SCE
TOU-GS-3-TRS-E-3Cprime	USCA-XXMB-0184-SCE	USCA-XXMB-0184-SCE

TOU-PA-2-A-3Cprime	USCA-XXMB-0185-SCE	USCA-XXMB-0185-SCE
TOU-PA-2-B-3Cprime	USCA-XXMB-0186-SCE	USCA-XXMB-0186-SCE
TOU-PA-2-PRI-D-3Cprime	USCA-XXMB-0187-SCE	USCA-XXMB-0187-SCE
TOU-PA-2-PRI-D5-3Cprime	USCA-XXMB-0188-SCE	USCA-XXMB-0188-SCE
TOU-PA-2-PRI-E-3Cprime	USCA-XXMB-0189-SCE	USCA-XXMB-0189-SCE
TOU-PA-2-PRI-E5-3Cprime	USCA-XXMB-0190-SCE	USCA-XXMB-0190-SCE
TOU-PA-2-SEC-D-3Cprime	USCA-XXMB-0191-SCE	USCA-XXMB-0191-SCE
TOU-PA-2-SEC-D5-3Cprime	USCA-XXMB-0192-SCE	USCA-XXMB-0192-SCE
TOU-PA-2-SEC-E-3Cprime	USCA-XXMB-0193-SCE	USCA-XXMB-0193-SCE
TOU-PA-2-SEC-E5-3Cprime	USCA-XXMB-0194-SCE	USCA-XXMB-0194-SCE
TOU-PA-2-SUB-D-3Cprime	USCA-XXMB-0195-SCE	USCA-XXMB-0195-SCE
TOU-PA-2-SUB-D5-3Cprime	USCA-XXMB-0196-SCE	USCA-XXMB-0196-SCE
TOU-PA-2-SUB-E-3Cprime	USCA-XXMB-0197-SCE	USCA-XXMB-0197-SCE
TOU-PA-2-SUB-E5-3Cprime	USCA-XXMB-0198-SCE	USCA-XXMB-0198-SCE
TOU-PA-2-TRS-D-3Cprime	USCA-XXMB-0199-SCE	USCA-XXMB-0199-SCE
TOU-PA-2-TRS-D5-3Cprime	USCA-XXMB-0200-SCE	USCA-XXMB-0200-SCE
TOU-PA-2-TRS-E-3Cprime	USCA-XXMB-0201-SCE	USCA-XXMB-0201-SCE
TOU-PA-2-TRS-E5-3Cprime	USCA-XXMB-0202-SCE	USCA-XXMB-0202-SCE
TOU-PA-3-A-3Cprime	USCA-XXMB-0203-SCE	USCA-XXMB-0203-SCE
TOU-PA-3-B-3Cprime	USCA-XXMB-0204-SCE	USCA-XXMB-0204-SCE
TOU-PA-3-PRI-D-3Cprime	USCA-XXMB-0205-SCE	USCA-XXMB-0205-SCE
TOU-PA-3-PRI-D5-3Cprime	USCA-XXMB-0206-SCE	USCA-XXMB-0206-SCE
TOU-PA-3-PRI-E-3Cprime	USCA-XXMB-0207-SCE	USCA-XXMB-0207-SCE
TOU-PA-3-PRI-E5-3Cprime	USCA-XXMB-0208-SCE	USCA-XXMB-0208-SCE
TOU-PA-3-SEC-D-3Cprime	USCA-XXMB-0209-SCE	USCA-XXMB-0209-SCE
TOU-PA-3-SEC-D5-3Cprime	USCA-XXMB-0210-SCE	USCA-XXMB-0210-SCE

TOU-PA-3-SEC-E-3Cprime	USCA-XXMB-0211-SCE	USCA-XXMB-0211-SCE
TOU-PA-3-SEC-E5-3Cprime	USCA-XXMB-0212-SCE	USCA-XXMB-0212-SCE
TOU-PA-3-SUB-D-3Cprime	USCA-XXMB-0213-SCE	USCA-XXMB-0213-SCE
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TOU-PA-3-TRS-D-3Cprime	USCA-XXMB-0217-SCE	USCA-XXMB-0217-SCE
TOU-PA-3-TRS-D5-3Cprime	USCA-XXMB-0218-SCE	USCA-XXMB-0218-SCE
TOU-PA-3-TRS-E-3Cprime	USCA-XXMB-0219-SCE	USCA-XXMB-0219-SCE
TOU-PA-3-TRS-E5-3Cprime	USCA-XXMB-0220-SCE	USCA-XXMB-0220-SCE

2024/20
25

Load Management Standards

CENTRAL COAST COMMUNITY ENERGY

~~JERRI STRICKLAND~~

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Introduction

This plan highlights how Central Coast Community Energy's (3CE) Boards' decisions align with the California Energy Commission (CEC) goals by meeting or exceeding the timeline of their Load Management Standards (LMS). The strategies outlined in this plan are to be evaluated and implemented by 3CE staff at our board's direction.

About 3CE

Central Coast Community Energy (3CE) is a public agency that sources competitively-priced electricity from clean and renewable energy resources. Through its dedicated Boards and professional staff, 3CE is committed to reducing greenhouse gas emissions by accelerating the transition to 100% clean and renewable energy, while maintaining competitive rates. 3CE is committed to addressing the effects of climate change by investing in the development of a renewable and reliable grid that supports the electrification of sectors such as transportation, agriculture, and buildings—and incentivizing that change through innovative and impactful energy programs.

3CE is an A-credit rated public electric generation provider comprised of 35 municipal jurisdictions across five counties. ~~With two jurisdictions remaining to enroll,~~ 3CE currently serves over 1.2 million people through nearly 450,550,000 customer accounts representing approximately 95.94% of the region's electricity load. ~~3CE has a peak retail load of 5,200 MW and provides roughly 5 million MWh of power to its customers annually.~~ 3CE promotes long-term electric rate stability and energy security while reducing reliance on fossil fuels and stimulating our local economies.

3CE's Boards

3CE's Policy and Operations Boards, comprising 19 seats each, represent 35 member agencies. The Policy Board directs the strategic vision, budget, rates, and major non-power-procurement capital expenses, while the Operations Board oversees contracts and policies to ensure effective administration.

3CE's Boards are actively engaged in responsible fulfillment of state climate policies, resulting in:

1. **Procurement Strategy:** Commitment to serving 100% of retail sales with incremental clean and renewable energy by 2030, with a stretch goal of balancing monthly.
2. **Resource Adequacy Hedging:** Support for a structured approach ensuring system reliability through various measures, including investment in energy storage, baseload renewable energy technologies, and demand response.
3. **Ratemaking Discretion:** Utilizing the Policy Board's ratemaking discretion to adopt rates based on the cost to serve customers, supporting competitive and stable generation rates in line with state climate policies.
4. **Local and Targeted Hire Procurement Policy:** Establishment of a policy to prioritize local and targeted hiring in procurement processes.

The CEC's Load Management Standards

The Warren-Alquist Act of 1974 established the CEC and granted the CEC specific authority, including the ability to review and approve the siting of power plants, set efficiency standards for buildings and appliances, and establish load management standards. In 2022, the LMS underwent updates with amendments aimed at enhancing statewide demand flexibility in order to support California's climate policies and the aggressive adoption of renewable energy generation technologies.¹ These revised standards are applicable to major entities such as large investor-owned utilities, large publicly owned utilities, and twelve large Community Choice Aggregators (CCAs), like 3CE, providing over 700 GWh of electricity annually.

One important factor identified by the LMS in supporting demand flexibility and the state's climate policies is the principle of marginal-cost based rates. Marginal-cost based rates, commonly linked to the wholesale price of electricity, are determined by factors like fuel costs, operational expenses, and the total demand for electricity at a specific time. These rates fluctuate during the day, adapting to shifts in demand and the accessibility of diverse energy sources.

The CEC's primary objectives of the Load Management Standards encompass:

1. Ensuring the accuracy of existing and future time-varying rates in the Market Informed Demand Automation Server (MIDAS) rate database, which is publicly accessible and machine-readable.
2. Developing a standard rate information access tool to support third-party Demand Response and Load Management services.
3. Creating and submitting location marginal price-based rates that change at least hourly to reflect marginal wholesale costs.
4. Integrating information about new time-varying rates and automation technologies into existing customer education and outreach programs.²

To do this, the LMS outlines different goals and timelines for the large CCAs, publicly owned utilities (POUs) and investor-owned utilities (IOUs) to meet all four of the primary objectives. A notable difference for CCAs is that the LMS allows CCAs to either create their own rates or programs *or participate in already existing IOU programs and rate offerings, with their governing board's approval.* The following sections of this document elaborate how 3CE ~~plans~~ is implementing the plan to meet or surpass these objectives, outlining the board-approved plan concerning the main goals and other goals stipulated by the CEC Load Management Standards.

¹ California Energy Commission. "Load Management Fact Sheet." Accessed February 2024.
https://www.energy.ca.gov/sites/default/files/2022-10/Load_Management_Fact_Sheet_ADA.pdf

² California Energy Commission. "Load Management Standards." Accessed February 2024.
<https://www.energy.ca.gov/programs-and-topics/topics/load-flexibility/load-management-standards>

CEC Review Process

Title 20 of the California Code of Regulations §1623.1(a)(3) establishes a process for the CEC Executive Director to review individual LMS plans and make requests to LSEs for changes or updates. The review of 3CE's Board Adopted Load Management Standards Compliance Plan, filed March 7, 2024, was found to be reasonable and supported by objective data and other information, but the Executive Director requested 3CE update its plan to incorporate its participation in California Public Utility Commission (CPUC) approved dynamic rate pilots, which were still in development at the time the plan was docketed, and to include a statement that addresses the statewide RIN tool into its revision. On September 17, 2025, 3CE submitted its updated LMS Plan to incorporate the recommended changes and requested information for compliance with 20 CCR §1623.1(a)(1) and §1623.1(a)(2).

Table 1: LMS Standards and Goal Date

Load Management Standard	Description	LMS Goal Date	Status	
§1623.1(c)	Within three months of LMS effective date, upload existing time-dependent rates to the MIDAS database	1-Jul-23	Achieved (Ahead of goal date.)	Formatted: Font color: Auto
§1623.1(a)(1)	Within one year of LMS effective date, develop and submit a plan addressing how 3CE intends to meet the objectives of the CEC LMS, including the evaluation of marginal cost-based rates and programs, to 3CE's Board. The plan must be considered for adoption within 60 days after submission.	1-Apr- 23 24	Achieved (Ahead of goal date.)	Formatted: Font color: Auto Formatted: Font color: Auto
§1623.1(a)(3)(A)	Submit a plan to CEC within 30 days of adoption of the plan. Respond to requests for additional information and/or recommendations within 90 days.	30 days after 3CE board vote	In progress Achieved	Formatted: Font color: Auto Formatted: Font color: Auto, Strikethrough
§1623(c)	Within one year of LMS effective date, provide customers access to their Rate Identification Numbers (RIN) on billing statements and in online accounts using both text and QR code.	31-Mar 1-Apr-24	In progress Achieved	Formatted: Font color: Auto Formatted: Font color: Auto Formatted: Font color: Auto
§1623(c)	Within 18 months of LMS effective date, develop and submit to the CEC, in conjunction with the other obligated utilities, a single statewide standard tool for authorized rate data access by third parties, and the terms and conditions for using the tool. Upon	1-Oct-24	In progress Achieved	Formatted: Font color: Auto Formatted: Font color: Auto, Strikethrough

	CEC approval, maintain and implement the tool.			
§1623.1(b)(3)	Within 18 months of LMS effective date, submit to the CEC a list of load flexibility programs deemed cost effective by 3CE. The portfolio of programs must provide at least one option to automate response to MIDAS signals for each customer class where 3CE's Board has determined such a program would materially reduce peak demand.	21-Oct-24	In progress	Formatted: Font color: Auto Formatted: Font color: Auto
§1623.1(a)(3)(C)	Submit annual reports to the CEC demonstrating implementation of plan, as approved by the Board	Annually	Ongoing	Formatted: Font color: Auto
§1623.1(b)(2)	Within twenty-seven months of the LMS effective date, submit at least one marginal cost-based rate or program to Board for approval for any customer class(es) where such a rate will materially reduce peak load. An Information copy of the tariff applications will be provided to the CEC.	1-Jul-25	In progress	Formatted: Font color: Auto
§1623.1(b)(24)	Within fifty-one months of the LMS effective date, offer each customer voluntary participation in either a marginal cost-based rate, if approved by the Board, or a cost-effective load flexibility program.	1-Jul-27	In progress	Formatted: Font color: Auto
§1623.1(b)(5)	Conduct a public information program to inform and educate affected customers why marginal cost-based rates or load flexibility programs and automation are needed, how they will be used, and how these rates and programs can save customers money.	No Goal Date Specified	Dependent upon 3CE board direction, to be done in coordination with Marginal Rate or Program Deployment; Ongoing	Formatted: Font color: Auto Formatted: Font color: Auto, Strikethrough
§1623.1(a)(1)(C)	Review the plan at least once every 3 years after the plan is adopted and submit a plan update	Triennially	Ongoing	Formatted: Font color: Auto

	to the Board if there is a material change.		
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3CE's Plan for Marginal Rate Development

Rate Design & Deployment

CCA governing boards have jurisdictional control over rate setting on behalf of their customers. Public Utilities Code Section 366.2(c)(3) provides that that CCAs retain jurisdiction for setting rates for the electricity they purchase on behalf of their communities. This local control empowers CCAs to tailor energy programs, determine pricing structures, and prioritize renewable energy sources according to the preferences and goals of the communities they serve.

3CE sets rates locally through a transparent process involving community stakeholders and board members representing each community 3CE serves. Local rate-setting reflects our region's coastal and inland climates, the unique energy needs of our diverse Central Coast community and allows for input from customers and communities served.

3CE also conducts rigorous data driven analysis prior to presenting options to the Policy Board and community stakeholders prior to rate adoption. Quantitative studies are conducted to ensure that rates are fair, equitable, and competitive while recovering necessary costs. One way 3CE does this is by designing rates using a cost-of-service rate structure. The cost-based rate structure allows for simple, stable rates that support 3CE's commitments to customer benefits, community investment, and the growth of clean and renewable energy.

When proposing either participation in a dynamic pricing program or customer rate option, 3CE will ensure that charges to the customer follow these same principles. 3CE will only seek Board approval for time-dependent rates after such rates have been proven to be cost-effective, equitable, technologically feasible, and beneficial to customers and the grid. This could result in an array of marginal rates for all customers, or fewer for more niche customer classes that are proven cost-effective.

The CEC LMS requests the Large CCAs to present at least one marginal cost-based rate to their Boards by July 1, 2025 ~~and to offer customers voluntary participation, if approved by, In the Board, by June 30, 2027. 3CE has original version of this plan, 3CE found that it did not have sufficient evidence to conclude that independently developing and implementing dynamic rates in 3CE's service area on the timeline outlined in the LMS would be cost effective or provide material incremental reductions to peak load beyond those of its current rate and programs portfolio for any customer class. However, 3CE had already begun investigating various pathways that achieve these the LMS timelines through opportunities, such as the IOU-partnered programs Expanded Flexible Irrigation Pilot Program for Agriculture (AgFIT) and the Southern California Edison Company (SCE) Dynamic Rate Pilots that were recently approved for expansion to CCAs by the California Public Utilities Commission (CPUC) in the Demand Flexibility proceeding (R.22-07-005).~~³ ~~These pilots could be fruitful opportunities to test~~

³ California Public Utilities Commission. D.24-01-032. Accessed February 2024.
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M524/K176/524176497.PDF>.

viability, establish best practices for customer support, As detailed in this plan, 3CE has met the LMS timeline under Section 1623.1(b)(2) by committing to two CPUC dynamic rate pilot opportunities: PG&E's Expanded Pilots 1 and gain2. 3CE will utilize experience with differing programmatic designs for real time pricing, participating in the pilots to evaluate the development of an independent rate or program by July 1, 2027, per Section 1623.1(b)(4).

As 3CE considers potential marginal rates and program options, distinct deployment timelines emerge dependent upon joining an existing pilot or independently testing marginal rates and program concepts. Depending upon Balancing the CPUC decision in the current Demand Flexibility proceeding, the Pacific Gas and Electric Company (PG&E) Expanded AgFIT pilot and SCE Demand Flex Pilot could be available for CCA participation as soon as June 2024. With the quickly approaching availability of opportunities and limited meetings of the policy board in 3CE's Policy Board in conjunction to those timelines, ***the first step of instituting this LMS Plan will be was for 3CE's the board to approve and authorize the CEO to submit this the original LMS plan to the CEC, in a form that is substantially similar to what is outlined herein, as well as any subsequent updates which align with the written CEC LMS.*** The original approval and designation of 3CE's LMS plan occurred on February 1, 2024.⁴ 3CE's board will still have the ultimate authority, but the designation to the CEO will allow allows 3CE to meet all LMS timelines and potential opportunities without delay due to the cadence of board meetings.

3CE will consider all available options; however, if IOU programs are not equitably designed for both bundled and unbundled customer participation, 3CE may consider the creation of 3CE will provide updates to its own independent marginal rate pilot. This would be brought back to the Board for approvals. In the Board in its next section, 3CE considers its options for Marginal Rate Design if were not to participate in an existing IOU rate or pilot, plan iteration and any annual reports.

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⁴ 3CE Policy Board of Directors February 21, 2024 Meeting Agenda. Accessed August 2025.
<https://pub-3ce.escribemeetings.com/FileStream.ashx?DocumentId=4127>

Table 2: Goals Met or Progressed by Participating in Existing IOU Programs

CPUC Approved Programs	Load Management Standards	LMS Goal Date	Potential Program Start Date
1. PG&E Expanded AgFIT Pilot Program 1	§1623.1(b)(3): Submit to the CEC a list of load flexibility programs deemed cost effective. At least one option to automate response to MIDAS signals for each customer class where 3CE's Board has determined it would materially reduce peak demand.	2-Oct-24	1-Jun-24
2. PG&E Expanded Pilot Two 2			
3. SCE Dynamic Rate Pilot	*Both pilot opportunities could allow customers to respond to MIDAS signals to shift their energy usage to times where energy is less expensive.		1-Jun-24
1. PG&E Expanded Pilot 1	§1623.1(b)(2): <u>Submit at least one marginal cost-based program to Board for approval for any customer class where such a rate will materially reduce peak load.</u> <u>*Rates utilized for these pilot programs utilize pre-approved CPUC rate formulas. Board approval to participate would also be consenting to utilizing the IOU formulas.</u>	1-Jul-25	1-Jun-24
2. PG&E Expanded Pilot 2			
3. SCE Dynamic Rate Pilot			1-Jun-24
1. PG&E Expanded AgFIT Pilot Program	§1623.1(b)(2): <u>Submit at least one marginal cost-based program to Board for approval for any customer class where such a rate will materially reduce peak load.</u>	1-Jul-25	1-Jun-24

2. PG&E Expanded Pilot Two	*Rates utilized for these pilot programs utilize pre-approved CPUC rate formulas. Board approval to participate would also be consenting to utilizing the IOU formulas.		
3. SCE Dynamic Rate Pilot			1-Jun-24
1. PG&E Expanded AgFIT Pilot Program 1	§1623.1(b)(2) Offer Customers voluntary participation in either a marginal cost-based rate, or cost-effective load flexibility program. *Participating in either pilot would create a voluntary participation opportunities in a load flexibility program for 3CE customers.	1-Jul-27	1-Jun-24
2. PG&E Expanded Pilot Two 2			
3. SCE Dynamic Rate Pilot			1-Jun-24

List of cost-effective LMS-compliant programs and rates

1623.1(b)(3) requests the Large CCAs to submit a list of load flexibility programs deemed cost effective to the Executive Director by October 1, 2024. At least one program must allow for automated responses to MIDAS signals for each customer class that the rate-approving body had determined the program would materially reduce peak load. 3CE met this goal and has since expanded its related programmatic offerings. The following section outlines current programs and considerations for 3CE's governing board, our rate-approving body.

Hourly-MIDAS signals-based load flexibility programs

3CE's board has already approved work to support demand management that responds to real-time pricing (RTP) signals. The incorporation of hourly-MIDAS signals will be considered as the system is tested and proven it can be effectively integrated into 3CE and third-party platforms.

Participation in CPUC Approved Programs

3CE is participating in and has begun customer enrollment in CPUC approved dynamic rate pilot opportunities across its service area, aligning with the California Energy Commission's LMS. 3CE enrolled in CPUC Expanded Pilots 1 and 2 through the filing of Tier 1 Advice Letters on May 3, 2024, and January 22, 2025.^{5 6}

Pacific Gas & Electric (PG&E) Expanded Pilot 1 and 2:

The original agricultural dynamic rate pilot (AgFIT) aimed to help farms manage costs by optimizing energy load for irrigation. Decision (D.) 24-01-032 expanded the program, Expanded Pilot 1, to all Agricultural end uses and directs PG&E to offer Expanded Pilot 2 to residential and commercial customers. The Decision allows all CCAs in PG&E's service area to participate until the pilot conclusions on December 31, 2027.

Pilot Generation Rate:

For the generation components of the Expanded Pilots, energy costs (1) are based on CAISO wholesale market prices, and (2) generation and flexible capacity costs are recovered hourly using the scarcity pricing concept.⁷ The capacity cost recovery functions for all components will be calibrated to fully recover annual LSE generation costs and UDC delivery costs. Additional costs may be recovered through existing rate structures or a monthly subscription charge.

Target Customers:

The Expanded Pilot 1 is open to customers on AG-A1, AG-A2, AG-B, and AG-C rates for any end use. Expanded Pilot 2 is open to customers on E-ELEC, EV-2A, B-6, B-10, B-19, and B-20.⁸

⁵ Central Coast Community Energy, *Notification of Enrollment of Customers in Pacific Gas and Electric Company Agricultural Dynamic Rate Pilot*, Advice Letter 40-E (Tier 1), filed May 3, 2024, pursuant to D.24-01-032

⁶ Central Coast Community Energy, *Notification of Enrollment of Customers in Pacific Gas and Electric Company Expanded Pilot 2 Authorized in Decision 24-01-032*, Advice Letter 43-E (Tier 1), filed January 22, 2025, pursuant to D.24-01-032

⁷ California Public Utilities Commission. D.21-12-015. Accessed February 2024.

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M428/K821/428821475.PDF>.

⁸ California Public Utilities Commission. D.24-01-032. Accessed February 2024.

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M524/K176/524176497.PDF>.

Enrollment & Load Impact Projections:

3CE aims to enroll 5 MW of eligible load into the pilot programs, adopting a measured approach for effective planning.

Customers Protections:

Expanded Pilot 1 utilizes a subscription model, enabling customers to plan their workload and associated costs. The subscription load shape is based on the customer's historic hourly usage, billed at the legacy rate. Deviations are billed at the dynamic volumetric rate.

Both Expanded Pilots utilize shadow billing, which provides additional customer protection. The Shadow bills track participants' load-shifting performance and compensation from both 3CE and PG&E. The customer would never pay more than their original tariff cost.³ This ensures minimal risk to customers, incentivizing participation by aligning operations with cost-effective power times. The shadow billing method allows 3CE and PG&E time to consider necessary billing upgrades and customer enhancements.

3CE's participation demonstrates a commitment to equitable treatment for CCA customers. If PG&E mismanages the pilot, 3CE may proceed with its own AgFIT-inspired pilot in the future.

Equipment Requirements:

While automation equipment can assist in load-shifting, it is not necessary for the Expanded Pilots.⁹

Third-party Automation Providers:

As determined by D. 24-01-032, PG&E will manage contracts with third-party vendors. In the Expanded Pilots, PG&E would collaborate with third-party automation service providers.

6 Month Update: Marginal Rate Program Performance

Since beginning enrollments in PG&E's Hourly Flex Pricing Pilot 1 & 2 in January 2025, 3CE has had 74 individual meters enroll. A breakdown of customer enrollments by segment and aggregate total enrolled load is shown below:

<u>Pilot</u>	<u>Customers Enrolled</u>	<u>Total Enrolled Load</u>
<u>Expanded Pilot 1 (Agricultural)</u>	<u>6</u>	<u>4.04 GWh</u>
<u>Expanded Pilot 2 (Commercial)</u>	<u>56</u>	<u>13.50 GWh</u>
<u>Expanded Pilot 2 (Residential)</u>	<u>12</u>	<u>0.10 GWh</u>
<u>TOTAL</u>	<u>74</u>	<u>17.64 GWh</u>

Table: 3CE Expanded Pilot Enrollment as of August 28, 2025.

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Southern California Edison (SCE) Dynamic Rate Pilot:

SCE is conducting the CalFUSE Dynamic Rate Pilot, expanded to CCAs by D.24-01-032. The generation component includes a capacity price function with day-ahead CAISO energy as a

⁹ Polaris Energy Services. "Polaris +Valley Clean Energy | 2022 Incentive Program." YouTube video. August 18, 2022. https://www.youtube.com/watch?v=JnJJCIVSs_c

passthrough. Due to delays in the development and CCA enrollment in SCE's Dynamic Rate Pilot, 3CE opted to participate in PG&E's pilot to gain insight into the development of real time pricing.

OhmConnect

3CE entered into a marketing agreement with OhmConnect, a third-party demand response company, to help customers load shift. Customers using OhmConnect can lower their electricity bill and earn rewards. OhmConnect is a free service that rewards utility customers in California and other states for saving energy. When customers can sign up to receive alerts when energy is most expensive and non-renewable. If the customer saves electricity during peak times, OhmConnect will provide awards through gift cards or even cash via Paypal. OhmConnect is able to provide these rewards by bundling the energy savings of all of its users and selling it back to the California Independent System Operator's (CAISO) energy markets. CAISO pays OhmConnect for the energy that is not used. Customers who are enrolled with OhmConnect are not able to participate in the Expanded Pilot 1 or 2 due to its categorization of a dual enrollment program as a supply-side Demand Response programs or event-based load-modifying programs, regardless of the Load Serving Entity.

3CE's Residential Battery Rebate Program and Potential Demand Response Program

3CE launched its Residential Battery Rebate Program on July 22, 2024, to achieve load shifting by increasing the adoption of behind-the-meter battery storage systems. The program empowers individual customers to cost-effectively manage their electricity use, leading to reduced demand in 3CE's territory during net peak hours. As of July 15, 2025, 3CE has received 425 applications for the program and shifted 1,391 kWh of load daily between 4PM and 9PM.

Additionally, 3CE is seeking a contractor(s) to design, implement, and manage a demand response program that leverages the batteries and potentially other grid-connected appliances to develop a suite of local distributed energy resources (DERs) that either 3CE or the program implementor can monitor and dispatch.

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Independent Marginal Rate Design Timeline

Section 1623.1(b)(2) of the LMS requests the Large CCAs to seek approval from their Boards for at least one dynamic rate or cost-effective program for which its rate-approving body determines such rate will materially reduce peak load. The application must be submitted within twenty-seven months of the updated LMS effective date, or by July 1, 2025. The rate offered, if desired, can mirror the IOUs in whose service area the Large CCA exists. ~~Rates or programs would be approved by the CCA's board and expanded to all customer classes that are deemed cost-effective and would reduce peak load, by July 1, 2027, in accordance with section 1623.1(b)(4).~~ 3CE has met this requirement by receiving approval and formally committing to participate in the CPUC Expanded Ag Fit Pilots.

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Section 1623.1(b)(4) of the LMS requests that within fifty-one months of the LMS effective date, the Large CCAs offer each customer voluntary participation in either a marginal cost-based rate, if approved by the Board, or a cost effective load flexibility program. 3CE will weigh the potential of offering its own program or a rate option to all of its customers. For either path Offering a rate or a program, if 3CE were to do so independently from an IOU-partnered program or rate, 3CE would need to explore the development of its own Marginal Rate Design. Calpine Energy Solutions (Calpine) is 3CE's contracted back-office provider who fulfills this function and would assist in accomplishing the work referenced throughout this section.

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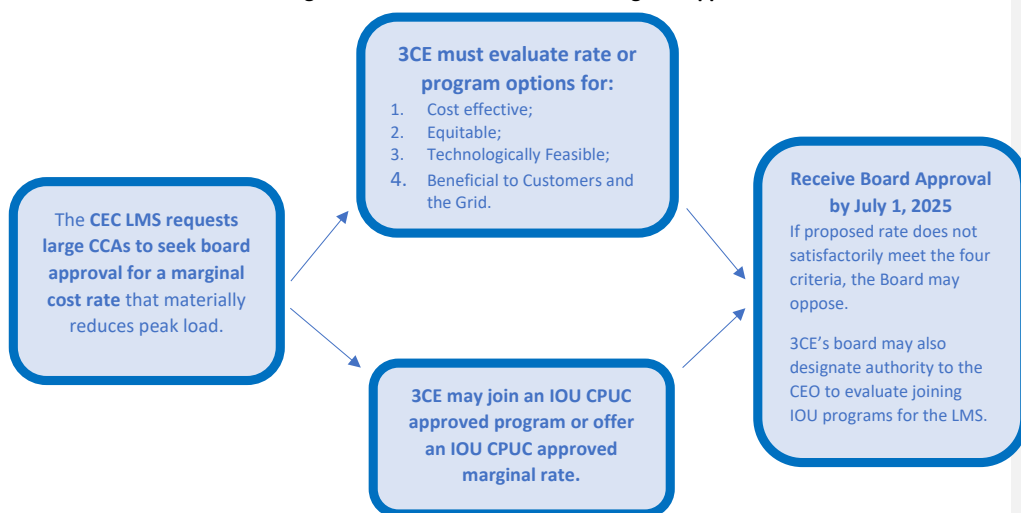
Independently creating a Marginal Rate Design would require setting up or subscribing to a real-time or day-ahead index sourcing data from CAISO markets and integrating it into the back-office provider's billing system. 3CE, Calpine, and potentially a rate design consultant, would develop the customized rate design to layer on top of the pricing signals coming from the index. Receiving interval data at the appropriate incremental level would be crucial for this program or rate.

Depending on how the IOUs make interval data available to the CCAs, Calpine would have to develop internal infrastructure to accept and provide quality assessments of new data streams coming from both SCE and PG&E. Due to current energy meter capabilities, technological shortfalls, or delayed timeliness of receiving data from the IOUs, it is inevitable that interval data will not be available for some customers some of the time. For those cases, 3CE and Calpine, would need to consider how to design a hierarchy of data to be substituted from other available sources. Any new program of this nature would require custom process controls to ensure accuracy and timeliness and custom reporting would have to be designed, built and maintained.

The LMS and CEC guidance states that rates must be shown to be (1) cost-effective, (2) equitable, (3) technologically feasible, and (4) beneficial to customers and the grid. 3CE would need to evaluate these factors along with its own standards of equitable and stable rate design if it elected to develop marginal rates and track them over time. The LMS requests that a single marginal rate be proposed to our board by April 1, 2025. The following sections outline 3CE's initial assessment of the four LMS rate criteria.

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Image 1: Flowchart for LMS Rate or Program Approval Process



Cost effectiveness

To evaluate the cost-effectiveness of Marginal Rate Designs and related programs at 3CE, both costs and benefits must be considered with the initial program and monitored over time as it matures.

3CE will consider the development of a framework or formula identifying and quantifying the cost-effectiveness. Demand-side management cost effectiveness tests are widely accepted and offer a general guideline or reference to developing a quantification of the cost and benefit for Marginal Rate Designs for 3CE and its customers. In California, the CPUC references these common cost-benefit tests for use in evaluating energy efficiency, demand response, and distributed energy resource program selections and justification. Some tests 3CE could utilize to evaluate cost-effectiveness include the Total Resource Cost (TRC), Ratepayer Impact Measure (RIM), Program Administration (PA), and Participant (PCT) Tests. Each of these tests generally evaluates the costs of the program or measure from the utility and/or customer point of view and the benefits in reduced bills for customers or costs for utilities.

To support the cost-effective evaluation of the marginal rate program and rates, 3CE will need to evaluate developing a calculation based on the TRC for energy efficiency measures. A simplified TRC calculation is a ratio of total benefits divided by total costs. If the TRC calculation is greater than 1.0, it means the total benefits outweigh the total costs. This could be performed by 3CE on a class-by-class basis for the marginal rate program to better inform performance and program related decisions. It could also consider societal benefit elements; however, they may be secondary qualitative benefits rather than quantified within the ratio of benefits to costs.

Components and elements to use in the cost-effectiveness calculation could include:

Costs to 3CE

- Program administration, staff time, applicable pilot programs, any customer information system or Calpine costs, etc.
- Customer incentives or rebates paid to participants to offset costs of a third party, new behind-the-meter device, or new technology application
- Potential cost difference between day-ahead-market forecast to real-time-market

Benefits to 3CE and its Customers

- Avoided energy and capacity/resource adequacy costs including incremental reserve margin considerations
- Environmental or greenhouse gas (GHG) reductions
- Other societal benefits, if desired and quantifiable; if not quantified, could be qualitative and considered in evaluation
- The CPUC Avoided Cost Calculator (ACC) could also be used to standardize the benefits of avoided energy, capacity, and GHG costs

Potential Metrics

- Marginal rate benefit to cost ratio for customer classes (a ratio of greater than 1.0 represents the benefits outweighing the costs)
- Other societal or qualitative benefit considerations

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Equity

Equity for Marginal Rate Designs should focus on two items: 1) the equity in the actual rate making and design of the rate to avoid cost shifting and 2) equitable customer access to and benefits from the program. Equity in rate making is a fundamental principle and goal in regulatory and utility

economics. Equity in reference to rate making is often linked to cost of service (COS) results which document and develop rates that are based on each customer class's costs imposed on the system to provide electric service. Comparing the customer class's COS and existing rate revenues identify potential subsidization issues from one or more customer classes to others. To avoid potential subsidies, COS-based rates are typically used as the basis for rate making. Thus, for equitable marginal rates in each class, a COS study or similar cost-based quantification with marginal costs for the marginal rates should be utilized.

Addressing equity is an important factor for 3CE. 3CE has an Underserved Communities Outreach and Engagement Plan that will be utilized to identify communities that have the potential to benefit most from possible cost savings of a marginal cost rates. The Engagement Plan also outlines the networks to collaborate with to engage most effectively with those communities.

To monitor and evaluate broader equity in customer participation for the program, 3CE would consider the development of various goals, targets, and even metrics to report on and guide strategy for the implementation of the marginal rate and plan across customer classes. With the implementation of complicated marginal rates which require a third party and application of new technologies, certain customer classes and customer segments within classes could be underserved unless thoughtful attention is made to ensure their enrollment and continued success. Residential and small commercial customer classes are likely to be less prepared to take advantage of marginal rate or program opportunities than larger, commercial and industrial customers with experience in these areas. To ensure equitable access to the marginal rate benefits or programs, especially in penetrating the residential and small commercial customer classes, 3CE may need to consider developing additional incentive programs to support adoption in these "hard to reach" or low-income and small businesses customer segments. These incentives would be designed to increase the adoption rates of the Plan and support the equitable availability and benefits of the marginal rates.

Possible metrics and goals 3CE will consider:

- Residential Customer Class:
 - Number of disadvantaged residential customers identified by 3CE load research that would benefit from marginal rates and were contacted to participate in incentives and the program.
 - Percent of total disadvantaged residential customers adopting marginal rates
- Small Commercial Class:
 - Number of local, small, or diverse business customers identified by 3CE load research that would benefit from marginal rate or program and were contacted to participate in incentives and the program.
 - Percent of total local, small, or diverse businesses adopting marginal rates

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Technologically Feasible

The third factor for evaluating the Marginal Rate Design and program is technological feasibility. 3CE would need to evaluate the rate design implementation for internal, customer, external-third-party technologies needed to utilize and take advantage of the new marginal rates.

Internal 3CE Technology Feasibility

The creation of a Marginal rate, if 3CE's board chooses to move forward with the design and implementation, is technologically feasible. All data required to design the cost-based rates is currently available via energy market data sources and 3CE's own customer usage data. As the Load-Serving Entity (LSE) marginal rates will be focused on power supply costs, all load profile data, hourly energy consumption, and class contributions to system peak demands are already known and available. Furthermore, 3CE and many CCAs have years of experience collaborating with, integrating, and utilizing IOU data sets including billing determinant data, charges and rate structures, and load profiles.

If 3CE's board chooses to implement and support the ongoing operation of a marginal rate or program, it will require additional technology or programming support to implement enhanced analysis and evaluation of marginal rates and programs. As a part of the implementation, 3CE data analytics would need to augment resources with a combination of external vendor support or internal up-scaling of staff. This could include investments in software, analysis, or machine learning to support the identification of specific customers or load profiles that would benefit from marginal rates. This type of additional effort and investment could support targeted marketing and increased beneficial participation in the program over time.

Customer Technology Feasibility

Availability of customer technology that can gather, understand, and take advantage of marginal rate pricing signals and opportunities is a critical success factor for these rates. One of the key data inventories and technology systems customers must interface with to take advantage of these opportunities is the CEC's MIDAS. MIDAS is intended to house an up-to-date inventory of utility rates for participating Californian electric utilities. For customers to participate in the marginal rate program, they must team with a third party or create their own Application Programming Interface (API) connection to MIDAS to continually receive the **Real Time Pricing (RTP)** rates required to make consumption related decisions. It is common for existing energy service companies to already have APIs set up to receive information from the local IOU on behalf of their customers or participants in utility programs. As energy service companies typically target and cater to large business and industrial customers, it is expected these classes will have early access to the RTP rates and enable the implementation in those classes. Further expansions of third parties or energy service companies into the small commercial and residential customer classes may lag behind the larger commercial and industrial customer classes.

There are customer-facing technologies that are currently, or will in the near future, have capabilities to interpret and enable actions based on the marginal rate pricing signals. These are likely to include current or expected two-way communication technologies and equipment such as EV charging, smart thermostats, battery storage, building control systems, and other energy efficiency programs or technologies currently in place. These existing customer technologies and equipment span residential to industrial customers. Thus, 3CE should be open to marginal rate program penetration in all customer classes and segments. While there are no specific metrics or key performance indicators initially identified in the technologically feasible factor, 3CE will continue to monitor customer enabling technologies, programs, or equipment available in each customer class to ensure opportunities in each customer class.

Potential Metrics for Customer Technology Feasibility

- 3CE could internally identify customers that would benefit from marginal rates or track the number of third-party technology providers serving each customer class.

Beneficial to Customers and the Grid

If 3CE were to design a marginal rate or program it would need to support benefits for both the customers and grid. One way of doing so is using cost-based principles within the rate design. This provides an impartial view of the costs and benefits which allows customers and related enabling technologies to make choices on the economics and then shift or change consumption patterns. Below is a summary of the customer and grid-related benefits.

Customer Benefits

Customer benefits could potentially include reduced bills if optimized and properly managed by the customer or third-party technology. A reduction in demand should result in lower costs for all customers during peak hours. While marginal rates provide opportunities for reduced costs and bills, there is also the potential for increased risks related to volatile market prices. Customers must manage these market pricing risks or have a way to mitigate them during large pricing fluctuations, seasonal shifts, or weather events. To address the large potential pricing fluctuations in the market, 3CE could consider an additional fee, subscription model, or fixed ~~change~~charge related to the marginal rate or program for customers. This added rate component would act to support a pricing mitigation or hedging program on behalf of customers to limit customer's exposure to large swings in prices or weather events. 3CE could consider offering this program or allowing the market and third parties to develop a pricing exposure or hedging service for customers.

Grid Benefits

Grid related benefits are assumed to be shared or passed through to customers. These financial benefits are directly linked to the marginal rate and cost-basis which include avoided future generation capacity or resource adequacy costs and avoided energy purchases. There may also be reduced GHG compliance costs which would also benefit the utility and grid. Broader non-economic benefits would include reduced GHG emissions.

Potential Metrics for Grid Benefit

- Reduced customer bills
- Reduced utility energy and resource adequacy costs
- Reduced GHG compliance costs
- Reduced GHG emissions

Resources to Create Marginal Rate Design

The examination of marginal rate design and potential programs has already incurred costs, utilized staff time, and consumed resources. To create a Marginal Rate that considers the four criteria described in the previous section, 3CE would need to hire a Rate Design Consultant to assist in the

evaluation. The final rate designed by the consultant would then need to be presented to the board for approval.

Resources and efforts that have already been spent:

In the development of this plan, 3CE has already dedicated the following efforts:

- Time to create a Request for Proposal (RFP) for a Rate Design Consultant.
- Cost of Rate Design Consultant to consider variables and initial evaluation of LMS requirements.
- Analysis from back-office providers on needs for billing and customer performance evaluation of marginal rates.
- 3CE staff time to
 - Participate in CEC LMS Working Groups.
 - Conduct vendor negotiations and contract development for consultants.
 - Produce the ~~of~~ LMS Plan and present it to their board

Future Resources and Efforts Estimation

Based on our initial assessment, we have determined that while aspects of future creation of marginal rates are feasible, the overall effort needed for a final product will be significant and require contracting with an external rate design consultant.

3CE Staff Needs:

- Finance and Rates staff representative(s) to support marginal rate development, cost research and analysis and rate making.
- Customer Engagement or Customer Programs staff and leadership to support stakeholder engagement and development of the incentives and overall Plan.
- IT and Data Warehouse staff to support data queries, machine learning efforts and analysis of customer and system loads.

Rate Design Consultant Needs:

- Rate Design Consultant contract and staff to support and develop marginal rates.
- Ongoing support and evaluation of 3CE's LMS Plan, potential research topics and data analytics.

Rate Deployment Timeline

Once a rate or program is designed and tested, the logical progression to contemplate is the deployment of the rate and customer enrollment. Section §1623.1(b)(2) requests that the Large CCAs offer customers voluntary participation in either a marginal cost-based rate, if approved by the Board, or a cost-effective load flexibility program by July 1, 2027. The timeline of deployment is dependent upon whether 3CE's board elects to adopt a marginal rate that mirrors the IOUs by participating in a CPUC-approved program or chooses to design its own rate or program. The Board will make their assessment based upon the lessons learned from potential pilot participation, rate consultant insights, and staff recommendations.

Anticipated Resources for Rate Deployment

To deploy a marginal rate, 3CE would need to complete its design and seek approval from the Policy Board. If staff were directed to ~~do~~ deploy the rate, this would require both internal infrastructure and staff to support customer outreach. The exact requirements would be based upon final program design and targeted customers.

Although not exhaustive and subject to change, 3CE anticipates that the following resources would be needed to successfully deploy a new marginal rate in its service area:

- Internal rate education by rate design consultant.
- Full Outreach Campaign Design & Budget
 - o Defined goals and outreach strategy
 - o Clear messaging for targeted audience
 - o Additional warm-up campaigns for historically hard-to-reach customers
- Website development
- Call Center Training
- Customer Marketing & Education on the rate opportunity
- Design Marketing Collateral
- Informational Webinars
- 1:1 Contact with enrolling customers
- 1:1 Ongoing Contact throughout enrolled customers participation
- Email, Direct Mail, Social & Digital campaigns

Internal infrastructure for Marginal Cost Rates Adoption

Upgrades to 3CE's internal infrastructure and back-office provider capabilities are anticipated if marginal rates are adopted. Although not an exhaustive list, below are anticipated areas where staff and contracted vendors will need to consider upgrades:

Billing system compatibility review and improvement plan and resource commitment:

Implementing a marginal rate in general or more specifically an expansion of the AgFIT program, would require a significant investment in billing engine infrastructure upgrades and staff training for 3CE's back office-provider, Calpine Energy Solutions. In order to train existing staff and potentially bring on new team members to support these innovative rate structures, Calpine, would set weekly meetings to ensure a comprehensive understanding of the regular requirements to support those rates. Weekly meetings to design the program including the billing system, controls, processes, and reporting would also be expected.

A significant component of the work to support marginal rates would go into developing the new rate sheets. New hourly rate sheet will need to be designed, tested, and their cadence determined. This may require daily price updates, depending on program structure.

In order to appropriately bill customers on any form of marginal rate, 3CE and their back-office provider, Calpine, would need to receive the appropriate interval usage data from PG&E for participating customers. Calpine would be expected to implement this process, new controls and reporting would be needed, as well as updates to the internal customer information system and contact center talking points for external communication. A significant amount of staff time would be allocated to monitoring the new systems in place to support the marginal rate or program. This work would also

be determined based on the size of the customer segment targeted for participation and different needs for that customer type, whether they are residential, commercial, or agricultural.

3CE would also need to work with a Rate Design Consultant to ensure an hourly marginal costs-based rates calculation system was developed. This would require upgrades to the current billing system functionality. Due to the necessary upgrades and additional services required for marginal rate implementation, 3CE anticipates that it would need to be able to cover increased costs on data storage, data transfer, legal review, staff time, and more.

Time-Dependent rate submission to MIDAS via MIDAS Application Programming Interface (API)

Status of MIDAS submissions for current time-dependent rates

3CE has successfully uploaded all generation rates and associated RINs to the CEC's MIDAS server. 3CE has a total of 588 rates uploaded into MIDAS including base rates and rates with price adders spanning both their PG&E and SCE territory combined. 3CE will continue to upload our generation rate components.

A comprehensive list of the rates 3CE has uploaded to MIDAS is included as Attachment A. .

Composite rate calculation and submission solution

3CE will continue to input our generation rates into MIDAS and will upload these rates into the MIDAS platform. 3CE does not plan to upload transmission and distribution rates that are designed by the IOUs.

Plan for ensuring accuracy and maintenance of current time-dependent rates

3CE has worked with our back-office provider, Calpine, to ensure that rates uploaded to MIDAS precedes customer billing on that rate. Calpine intends to streamline and update the rate transformation and upload process in the coming months in preparation for potential new requirements such as supporting marginal rates as they are designed and deployed by various LSEs. Part of changes that Calpine anticipates depend heavily on the issues that arise with the MIDAS server. Calpine has reported that, historically, the MIDAS server has been fragile and slow. Calpine has had to adjust its uploading methods to accommodate a system that rejects rates when an upload packet is too large and at times has been fully inaccessible. If these issues persist, they would constitute a significant challenge for uploading marginal rates on a daily basis.

Internal infrastructure progress/upgrades for LMS-complaint submission to MIDAS

3CE's back-office provider, Calpine, assisted with our successful and ongoing uploads to MIDAS by building a software application that transforms rate data into XML hourly streaming format and then uploads them to MIDAS through the provided API.

Uploading future marginal rates to the MIDAS server on a daily cadence will pose a significant challenge to Calpine. Calpine staff will need to devote regular meetings to tackling the issue of streamlining the current upload process, which to this point can take three days or longer, depending on the receptiveness of the MIDAS server. Calpine would need to build additional internal infrastructure to transform rates more quickly and find a way to upload them significantly faster than the server currently allows. Reporting for MIDAS uploads is currently manual and Calpine will need to develop automated reporting as a practical step for assuring 3CE that uploads are occurring timely and accurately.

Plan to provide RIN(s) on customer billing statements

Implementation plan with timeline

1623(c)(4) of the LMS requests that by March 31, 2024, RINs be incorporated into customer billing statements. Given that the IOUs act as billing agents, the design, placement, and input for RINs on the bill by Large CCAs are restricted. Nevertheless, 3CE will collaborate with our IOU partners to furnish RINs and customer information, facilitating their inclusion in the billing statement.

Billing system updates

3CE's back-office provider and IOUs have been in consistent communication to facilitate a plan for passing RINs created by Calpine to the IOUs for inclusion on customer invoices and to transform into QR codes. After several meetings, the IOUs have agreed to utilize the preferred Electronic Data Interchange 810 file (EDI 810) based on the merits of that EDI transaction set and in order to streamline the process across the different territories.

3CE foresees only one potential future issue, but has already reached a workaround until a more formal solution can be implemented by PG&E and Calpine. The rate ready billing method presents a unique challenge for passing RINs to PG&E because Calpine does not send 810s for those customers. Calpine and PG&E have tentatively agreed that Calpine will provide PG&E with a list of rates and their corresponding RINs. With that, PG&E will be able to include the appropriate RINs and QR codes on the bills as an integrated part of the rate ready billing process.

Proposed text design and QR code design and proposed placement on billing statements

As stated, the Large CCAs are limited by the IOUs in terms of design and placement of text and images on billing statements. However, 3CE is working with the IOUs to have consistent and understandable language regarding the RINs for customer understanding.

QR code linked webpage and design:

3CE anticipates that the QR code linked webpage on the customer bill will be to an IOU landing page that the Large CCAs have limited input. It is important that the Large CCAs are able to provide feedback to the IOUs, but we would likely augment the information with the webpages 3CE currently has. 3CE already supports the customer experience by having information on 3CE's website that provides a description of 3CE's rates and how rates are set and can provide a link to the MIDAS platform. Additionally, 3CE's website already provides information on 3CE's customer rate options and eligible programs.

Plans and current participation in the development of Single Statewide RIN Access Tool

~~Section 1623(c) requires the Large IOUs, Large POUs, and Large CCAs to develop a single statewide standard tool for authorized rate data access by third parties, along with a single set of terms and conditions for third parties using the tool, for submission to the CEC by October 1, 2024, for approval. 3CE has provided stakeholder input and participated in CEC workshops on the RIN Access Tool's development held on January 17, 2024. Stakeholders are awaiting a schedule for the development of the tool to be proposed by PG&E.~~

~~If the need for an extension is determined by stakeholders, the CEC Executive Director will be notified in accordance with section 1623(c)(2)(B) of the CEC's LMS.~~

Per Section 1623(c), 3CE has been working with the other regulated load serving entities (LSEs) on creating the Single Statewide RIN Access Tool pursuant to 20 CCR Section 1623(c). 3CE has already participated in working groups and development of an initial proposal for the RIN Access Tool. The proposed plan for the tool was submitted to the CEC for review on October 1, 2024. 3CE will continue to work with the other LSEs and the CEC on the implementation and maintenance of the statewide RIN tool in a timely manner subject to the tool's approval by the CEC. The cost, design and implementation of the statewide RIN tool must be equitable to all customer types and address key issues. To ensure the tool best serves Californians, 3CE encourages the Commission to prioritize the following in its development:

- Funding and cost allocation for the Joint LSEs' Single Statewide RIN Access Tool are not addressed in the LMS. Funding must be determined before finalizing the tool's structure, with consideration of beneficiaries, Automated Service Providers, and their financial contributions.
- Evaluation metrics for the review of cost effectiveness and benefit of the RIN Access Tool to customers.
- Coordination between the Commission and the CPUC to ensure compatibility on real-time pricing system architecture, integration into dynamic rates, and potential funding sources.
- Cybersecurity measures to ensure customers personally identifiable information is safeguarded.
- Equitable user experience for both bundled and unbundled customers in utilization of the tool.

List of cost effective LMS compliant programs and rates

~~1623.1(b)(3) requests the Large CCAs to submit a list of load flexibility programs deemed cost effective to the Executive Director by October 1, 2024. At least one program must allow for automated responses to MIDAS signals for each customer class that the rate approving body had determined the program would materially reduce peak load. The following section outlines current and future opportunities of consideration for 3CE's governing board, our rate approving body.~~

Hourly MIDAS signals based load flexibility programs

~~3CE's board has already approved work to support demand management that responds to real-time pricing (RTP) signals. The incorporation of hourly MIDAS signals will be considered as the system is tested and proven it can be effectively integrated into 3CE and third party platforms.~~

OhmConnect

~~3CE entered into a marketing agreement with OhmConnect, a third party demand response company, to help customers load shift. Customers using OhmConnect can lower their electricity bill and earn rewards. OhmConnect is a free service that rewards utility customers in California and other states for saving energy. When customers can sign up to receive alerts when energy is most expensive and non renewable. If the customer saves electricity during peak times, OhmConnect will provide awards through gift cards or even cash via Paypal. OhmConnect is able to provide these rewards by bundling the energy savings of all of its users and selling it back to the California Independent System Operator's (CAISO) energy markets. CAISO pays OhmConnect for the energy that is not used.~~

Active Request for Proposals for Behind-the-Meter Battery Storage and Demand Response Program

3CE currently is in process of soliciting and identifying an outside vendor to deploy behind-the-meter battery energy storage systems to increase local resiliency and provide new tools and capabilities that support 3CE's goal of providing a portfolio of clean energy options to the communities and customers we serve. 3CE is seeking industry partner(s) to design, implement, and manage an innovative, safe, and accessible battery energy storage system program that provides meaningful benefits to our customers. Additionally, 3CE is seeking a contractor(s) to design, implement, and manage a demand response program that leverages the batteries and potentially other grid-connected appliances to develop a suite of local distributed energy resources (DERs) that either 3CE or the program implementer can monitor and dispatch.

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Potential Participation in CPUC Approved Programs

3CE is actively considering participation in CPUC Expanded Pilot opportunities across its service area, aligning with the California Energy Commission's LMS:

Pacific Gas & Electric (PG&E) Expanded AgFIT Pilot:

The original AgFIT aimed to help farms manage costs by optimizing energy load for irrigation. Decision (D-) 24-01-032 expanded the AgFIT program to all Agricultural end uses and allows all CCAs in PG&E's service area to participate until its conclusion on December 31, 2027.

Pilot Generation Rate:

For the generation components of the AgFIT pilot, energy costs (1) are based on CAISO wholesale market prices, and (2) generation and flexible capacity costs are recovered hourly using the scarcity pricing concept.¹⁰ The capacity cost recovery functions for all components will be calibrated to fully recover annual LSE generation costs and UDC delivery costs. Additional costs may be recovered through existing rate structures or a monthly subscription charge.

Target Customers:

The Expanded AgFIT Pilot is open to customers on AG-A1, AG-A2, AG-B, and AG-C rates for any end use.¹¹

Enrollment & Load Impact Projections:

3CE aims to enroll 5 MW of eligible load into the pilot program, adopting a measured approach for effective planning. Starting the pilot with a conservative goal is particularly critical for first-time pilot implementers, as it will allow newly participating CCAs to account for the rate of adoption and its potential impact on load forecasting while avoiding the risk of excessive energy procurement.

Customers Protections:

AgFIT utilizes a subscription model, enabling customers to plan their workload and associated costs. The subscription load shape is based on the customer's historic hourly usage, billed at the legacy rate. Deviations are billed at the dynamic volumetric rate. Shadow billing provides additional protection, tracking participants' load-shifting performance and compensation from

¹⁰California Public Utilities Commission. D-21-12-015. Accessed February 2024.
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M428/K821/428821475.PDF>.

¹¹California Public Utilities Commission. D-24-01-032. Accessed February 2024.
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M524/K176/524176497.PDF>.

~~both 3CE and PG&E. The customer would never pay more than their original tariff cost.¹² This ensures minimal risk to customers, incentivizing participation by aligning operations with cost-effective power times.~~

~~The shadow billing method allows 3CE time to consider necessary billing upgrades and customer enhancements. As 3CE expresses interest, a commitment is made to equitable treatment for CCA customers. If PG&E mismanages the pilot, 3CE may proceed with its own AgFIT inspired pilot in the future.~~

~~Equipment Requirements:~~

~~While automation equipment can assist in load shifting, it is not necessary for the AgFIT pilot.¹²~~

~~Third-party Automation Providers:~~

~~As determined by D. 24-01-032, PG&E will manage contracts with third-party vendors. In the Expanded AgFIT Pilot, PG&E would collaborate with third-party automation service providers.~~

PG&E's Expanded Pilot 2:

Using the same model as the original AgFIT program, D.24-01-032 also directed PG&E to offer a new secondary pilot that enrolls both residential and commercial rates (B-6, B-10, B-19, B-20, E-ELEC, and EV2-A). 3CE will continue to monitor this opportunity and the potential benefits to our customers.

~~Southern California Edison (SCE) Dynamic Rate Pilot:~~

~~SCE is conducting the CalFUSE Dynamic Rate Pilot, expanded to CCAs by D.24-01-032. The generation component includes a capacity price function with day-ahead CAISO energy as a passthrough. If 3CE participates, valuable insights for a marginal cost rate design, incorporating day-ahead CAISO Default Load Aggregation Point (DLAP) pricing to meet the CEC's LMS would be gained. 3CE is actively evaluating this new potential partnership opportunity.~~

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Additional Information Regarding Marginal Cost Rates & Programs

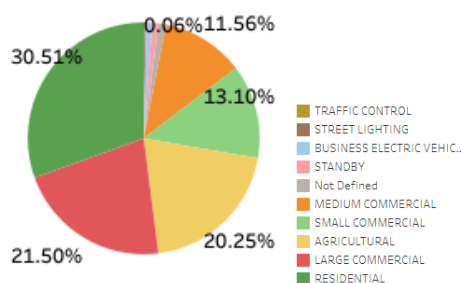
In formulating any rate or program, 3CE considers the distinctive requirements of our service area. Our commitment revolves around investing in the communities we serve, ensuring competitively priced rates, and offering energy program rebates and incentives that facilitate the transition of 3CE customers' homes, workplaces, and transportation from fossil fuel power to clean energy solutions.

Two notable features of 3CE set it apart: first, it stands as the largest CCA geographically, spanning over five counties across the central coast. Second, it caters to a substantial number of Agricultural customers, constituting approximately 22% of our total load. The communities and business operations within 3CE's service area are diverse, with varying factors like the types of crops grown by farmers influencing when and how they can modify their energy usage. This diversity extends to encompass small and large businesses, as well as residential customers across our service area. Below, Graph 1 provides insight by showing the breakdown of our load by various customer types. Given this vast geography and diverse customer base, it is crucial to consider the distinctive needs and usage

¹² Polaris Energy Services. "Polaris + Valley Clean Energy | 2022 Incentive Program." YouTube video. August 18, 2022. <https://www.youtube.com/watch?v=JnJICIVSs-E>

behaviors of all customers when introducing new programs and rates.

Graph 1: 2023 Electric Load Percentage by Customer Type



Public Information Program on Marginal Cost Rates/Programs

Section 1623.1(b)(5) of the LMS asks the Large CCAs to conduct a public information program to inform and educate affected customers why marginal cost-based rates or load flexibility programs and automation are needed, how they will be used, and how these rates and programs can save customers money.

3CE has a successful history of educating its customers spanning two IOU service areas on various energy related initiatives. These experiences include marketing the Time of Use Transition, our Cost-of-Service Rate launch, highlighting customer programs like CARE, FERA, AMP, CAPP and PIPP, and promoting our portfolio of energy programs and initiatives. 3CE also maintains consistent communication across its five-county region through monthly newsletters and social media posts.

In order to reduce costs To date, 3CE has taken the initial steps of promoting dynamic pricing through the following actions:

- Creation and maintenance of web page with information on the Expanded Pilot 1 and 2, as well as hyperlinked ASP names for convenient customer access.
- Call center equipped with extensive list of frequently asked questions and answers for those customers looking to learn more about dynamic rates and/or the Expanded Pilots 3CE is currently offering.
- 3CE has participated in over 5 public presentations to farm bureaus and chamber of commerce events to promote enrollment; in the Expanded Pilot 1 and 2.
- Over 10 key account meetings have occurred to discuss a Public Information Program would be run in conjunction with the launch of a board approved rate or program to personalized enrollment plan into the Expanded Pilot 1 or 2
- Email marketing campaigns sent to the top energy users across each eligible customer classes rate code in the Expanded Pilot 1 and 2.

3CE would design a campaign that As 3CE learns more about dynamic rate implementation through participation in the pilot, it will inform a future development of the public information campaign as 3CE considers the development of independent dynamic rates or programs. This would include more general information about marginal cost-based rates and customer benefits of participating in load flexibility opportunities. This may include direct mail, website, social media,

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newsletter articles, monthly content shares, and public presentations. 3CE would also consider working with community partners to ensure that all customer segments are reached.

~~At a minimum, 3CE would to have expand existing contracts with vendors to conduct graphic design, media buying, and video production as necessary. Staff time would also be dedicated and is anticipated at 25% of a full time Marketing and Communications staff member and 30% of a full time Accounts Management staff person.~~

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Conclusion

3CE expresses gratitude to its Policy Board for considering this plan and for their leadership in adopting programs and rates that benefit the communities we serve. The plan underscores 3CE's dedication to supporting the Central Coast region through grid reliability and customer-focused programs. It is important to note that the adoption of this plan and its considerations are subject to potential changes by our governing boards. New information on marginal rates and programs, as well as evolving customer needs, may influence these decisions.

Looking ahead, this plan remains flexible, open to adjustments as new information and opportunities emerge. 3CE staff will continuously assess opportunities to uphold reliability and align with the state's goals. The organization will explore rate and program designs that align with its values and support customers. As long as 3CE's goals, guided by our governing boards, align with those outlined in the CEC's LMS, the organization will voluntarily strive to meet the indicated standards.

Attachment A: MIDAS Rate Imports

Rate Name	RIN - Calpine	RIN - MIDAS
A-1-B Choice Flat	USCA-XXMB-0001-PGE	USCA-XXMB-0001-PGE
A-1-B Choice GR1	USCA-XXMB-0002-PGE	USCA-XXMB-0002-PGE
A-1-B Prime Flat	USCA-XXMB-0003-PGE	USCA-XXMB-0003-PGE
A-1-B Prime GR1	USCA-XXMB-0004-PGE	USCA-XXMB-0004-PGE
A-10-B-P Choice Flat	USCA-XXMB-0005-PGE	USCA-XXMB-0005-PGE
A-10-B-P Choice GR1	USCA-XXMB-0006-PGE	USCA-XXMB-0006-PGE
A-10-B-P Prime Flat	USCA-XXMB-0007-PGE	USCA-XXMB-0007-PGE
A-10-B-P Prime GR1	USCA-XXMB-0008-PGE	USCA-XXMB-0008-PGE
A-10-B-S Choice Flat	USCA-XXMB-0009-PGE	USCA-XXMB-0009-PGE
A-10-B-S Choice GR1	USCA-XXMB-0010-PGE	USCA-XXMB-0010-PGE
A-10-B-S Prime Flat	USCA-XXMB-0011-PGE	USCA-XXMB-0011-PGE
A-10-B-S Prime GR1	USCA-XXMB-0012-PGE	USCA-XXMB-0012-PGE
A-10-B-T Choice Flat	USCA-XXMB-0013-PGE	USCA-XXMB-0013-PGE
A-10-B-T Choice GR1	USCA-XXMB-0014-PGE	USCA-XXMB-0014-PGE
A-10-B-T Prime Flat	USCA-XXMB-0015-PGE	USCA-XXMB-0015-PGE
A-10-B-T Prime GR1	USCA-XXMB-0016-PGE	USCA-XXMB-0016-PGE
A-6 Choice Flat	USCA-XXMB-0017-PGE	USCA-XXMB-0017-PGE
A-6 Choice GR1	USCA-XXMB-0018-PGE	USCA-XXMB-0018-PGE
A-6 Prime Flat	USCA-XXMB-0019-PGE	USCA-XXMB-0019-PGE
A-6 Prime GR1	USCA-XXMB-0020-PGE	USCA-XXMB-0020-PGE
AG-4-A Choice Flat	USCA-XXMB-0021-PGE	USCA-XXMB-0021-PGE
AG-4-A Choice GR1	USCA-XXMB-0022-PGE	USCA-XXMB-0022-PGE
AG-4-A Prime Flat	USCA-XXMB-0023-PGE	USCA-XXMB-0023-PGE
AG-4-A Prime GR1	USCA-XXMB-0024-PGE	USCA-XXMB-0024-PGE
AG-4-B-P Choice Flat	USCA-XXMB-0025-PGE	USCA-XXMB-0025-PGE
AG-4-B-P Choice GR1	USCA-XXMB-0026-PGE	USCA-XXMB-0026-PGE
AG-4-B-P Prime Flat	USCA-XXMB-0027-PGE	USCA-XXMB-0027-PGE
AG-4-B-P Prime GR1	USCA-XXMB-0028-PGE	USCA-XXMB-0028-PGE
AG-4-B-S Choice Flat	USCA-XXMB-0029-PGE	USCA-XXMB-0029-PGE
AG-4-B-S Choice GR1	USCA-XXMB-0030-PGE	USCA-XXMB-0030-PGE
AG-4-B-S Prime Flat	USCA-XXMB-0031-PGE	USCA-XXMB-0031-PGE
AG-4-B-S Prime GR1	USCA-XXMB-0032-PGE	USCA-XXMB-0032-PGE
AG-4-B-T Choice Flat	USCA-XXMB-0033-PGE	USCA-XXMB-0033-PGE
AG-4-B-T Choice GR1	USCA-XXMB-0034-PGE	USCA-XXMB-0034-PGE
AG-4-B-T Prime Flat	USCA-XXMB-0035-PGE	USCA-XXMB-0035-PGE
AG-4-B-T Prime GR1	USCA-XXMB-0036-PGE	USCA-XXMB-0036-PGE
AG-4-C-P Choice Flat	USCA-XXMB-0037-PGE	USCA-XXMB-0037-PGE

AG-4-C-P Choice GR1	USCA-XXMB-0038-PGE	USCA-XXMB-0038-PGE
AG-4-C-P Prime Flat	USCA-XXMB-0039-PGE	USCA-XXMB-0039-PGE
AG-4-C-P Prime GR1	USCA-XXMB-0040-PGE	USCA-XXMB-0040-PGE
AG-4-C-S Choice Flat	USCA-XXMB-0041-PGE	USCA-XXMB-0041-PGE
AG-4-C-S Choice GR1	USCA-XXMB-0042-PGE	USCA-XXMB-0042-PGE
AG-4-C-S Prime Flat	USCA-XXMB-0043-PGE	USCA-XXMB-0043-PGE
AG-4-C-S Prime GR1	USCA-XXMB-0044-PGE	USCA-XXMB-0044-PGE
AG-4-C-T Choice Flat	USCA-XXMB-0045-PGE	USCA-XXMB-0045-PGE
AG-4-C-T Choice GR1	USCA-XXMB-0046-PGE	USCA-XXMB-0046-PGE
AG-4-C-T Prime Flat	USCA-XXMB-0047-PGE	USCA-XXMB-0047-PGE
AG-4-C-T Prime GR1	USCA-XXMB-0048-PGE	USCA-XXMB-0048-PGE
AG-5-A Choice Flat	USCA-XXMB-0049-PGE	USCA-XXMB-0049-PGE
AG-5-A Choice GR1	USCA-XXMB-0050-PGE	USCA-XXMB-0050-PGE
AG-5-A Prime Flat	USCA-XXMB-0051-PGE	USCA-XXMB-0051-PGE
AG-5-A Prime GR1	USCA-XXMB-0052-PGE	USCA-XXMB-0052-PGE
AG-5-B-P Choice Flat	USCA-XXMB-0053-PGE	USCA-XXMB-0053-PGE
AG-5-B-P Choice GR1	USCA-XXMB-0054-PGE	USCA-XXMB-0054-PGE
AG-5-B-P Prime Flat	USCA-XXMB-0055-PGE	USCA-XXMB-0055-PGE
AG-5-B-P Prime GR1	USCA-XXMB-0056-PGE	USCA-XXMB-0056-PGE
AG-5-B-S Choice Flat	USCA-XXMB-0057-PGE	USCA-XXMB-0057-PGE
AG-5-B-S Choice GR1	USCA-XXMB-0058-PGE	USCA-XXMB-0058-PGE
AG-5-B-S Prime Flat	USCA-XXMB-0059-PGE	USCA-XXMB-0059-PGE
AG-5-B-S Prime GR1	USCA-XXMB-0060-PGE	USCA-XXMB-0060-PGE
AG-5-B-T Choice Flat	USCA-XXMB-0061-PGE	USCA-XXMB-0061-PGE
AG-5-B-T Choice GR1	USCA-XXMB-0062-PGE	USCA-XXMB-0062-PGE
AG-5-B-T Prime Flat	USCA-XXMB-0063-PGE	USCA-XXMB-0063-PGE
AG-5-B-T Prime GR1	USCA-XXMB-0064-PGE	USCA-XXMB-0064-PGE
AG-5-C-P Choice Flat	USCA-XXMB-0065-PGE	USCA-XXMB-0065-PGE
AG-5-C-P Choice GR1	USCA-XXMB-0066-PGE	USCA-XXMB-0066-PGE
AG-5-C-P Prime Flat	USCA-XXMB-0067-PGE	USCA-XXMB-0067-PGE
AG-5-C-P Prime GR1	USCA-XXMB-0068-PGE	USCA-XXMB-0068-PGE
AG-5-C-S Choice Flat	USCA-XXMB-0069-PGE	USCA-XXMB-0069-PGE
AG-5-C-S Choice GR1	USCA-XXMB-0070-PGE	USCA-XXMB-0070-PGE
AG-5-C-S Prime Flat	USCA-XXMB-0071-PGE	USCA-XXMB-0071-PGE
AG-5-C-S Prime GR1	USCA-XXMB-0072-PGE	USCA-XXMB-0072-PGE
AG-5-C-T Choice Flat	USCA-XXMB-0073-PGE	USCA-XXMB-0073-PGE
AG-5-C-T Choice GR1	USCA-XXMB-0074-PGE	USCA-XXMB-0074-PGE
AG-5-C-T Prime Flat	USCA-XXMB-0075-PGE	USCA-XXMB-0075-PGE
AG-5-C-T Prime GR1	USCA-XXMB-0076-PGE	USCA-XXMB-0076-PGE
AG-A1 Choice Flat	USCA-XXMB-0077-PGE	USCA-XXMB-0077-PGE
AG-A1 Choice GR1	USCA-XXMB-0078-PGE	USCA-XXMB-0078-PGE

AG-A1 Prime Flat	USCA-XXMB-0079-PGE	USCA-XXMB-0079-PGE
AG-A1 Prime GR1	USCA-XXMB-0080-PGE	USCA-XXMB-0080-PGE
AG-A2 Choice Flat	USCA-XXMB-0081-PGE	USCA-XXMB-0081-PGE
AG-A2 Choice GR1	USCA-XXMB-0082-PGE	USCA-XXMB-0082-PGE
AG-A2 Prime Flat	USCA-XXMB-0083-PGE	USCA-XXMB-0083-PGE
AG-A2 Prime GR1	USCA-XXMB-0084-PGE	USCA-XXMB-0084-PGE
AG-B Choice Flat	USCA-XXMB-0085-PGE	USCA-XXMB-0085-PGE
AG-B Choice GR1	USCA-XXMB-0086-PGE	USCA-XXMB-0086-PGE
AG-B Prime Flat	USCA-XXMB-0087-PGE	USCA-XXMB-0087-PGE
AG-B Prime GR1	USCA-XXMB-0088-PGE	USCA-XXMB-0088-PGE
AG-C Choice Flat	USCA-XXMB-0089-PGE	USCA-XXMB-0089-PGE
AG-C Choice GR1	USCA-XXMB-0090-PGE	USCA-XXMB-0090-PGE
AG-C Prime Flat	USCA-XXMB-0091-PGE	USCA-XXMB-0091-PGE
AG-C Prime GR1	USCA-XXMB-0092-PGE	USCA-XXMB-0092-PGE
AG-F-A1 Choice Flat	USCA-XXMB-0093-PGE	USCA-XXMB-0093-PGE
AG-F-A1 Choice GR1	USCA-XXMB-0094-PGE	USCA-XXMB-0094-PGE
AG-F-A1 Prime Flat	USCA-XXMB-0095-PGE	USCA-XXMB-0095-PGE
AG-F-A1 Prime GR1	USCA-XXMB-0096-PGE	USCA-XXMB-0096-PGE
AG-F-A2 Choice Flat	USCA-XXMB-0097-PGE	USCA-XXMB-0097-PGE
AG-F-A2 Choice GR1	USCA-XXMB-0098-PGE	USCA-XXMB-0098-PGE
AG-F-A2 Prime Flat	USCA-XXMB-0099-PGE	USCA-XXMB-0099-PGE
AG-F-A2 Prime GR1	USCA-XXMB-0100-PGE	USCA-XXMB-0100-PGE
AG-F-A3 Choice Flat	USCA-XXMB-0101-PGE	USCA-XXMB-0101-PGE
AG-F-A3 Choice GR1	USCA-XXMB-0102-PGE	USCA-XXMB-0102-PGE
AG-F-A3 Prime Flat	USCA-XXMB-0103-PGE	USCA-XXMB-0103-PGE
AG-F-A3 Prime GR1	USCA-XXMB-0104-PGE	USCA-XXMB-0104-PGE
AG-F-B1 Choice Flat	USCA-XXMB-0105-PGE	USCA-XXMB-0105-PGE
AG-F-B1 Choice GR1	USCA-XXMB-0106-PGE	USCA-XXMB-0106-PGE
AG-F-B1 Prime Flat	USCA-XXMB-0107-PGE	USCA-XXMB-0107-PGE
AG-F-B1 Prime GR1	USCA-XXMB-0108-PGE	USCA-XXMB-0108-PGE
AG-F-B2 Choice Flat	USCA-XXMB-0109-PGE	USCA-XXMB-0109-PGE
AG-F-B2 Choice GR1	USCA-XXMB-0110-PGE	USCA-XXMB-0110-PGE
AG-F-B2 Prime Flat	USCA-XXMB-0111-PGE	USCA-XXMB-0111-PGE
AG-F-B2 Prime GR1	USCA-XXMB-0112-PGE	USCA-XXMB-0112-PGE
AG-F-B3 Choice Flat	USCA-XXMB-0113-PGE	USCA-XXMB-0113-PGE
AG-F-B3 Choice GR1	USCA-XXMB-0114-PGE	USCA-XXMB-0114-PGE
AG-F-B3 Prime Flat	USCA-XXMB-0115-PGE	USCA-XXMB-0115-PGE
AG-F-B3 Prime GR1	USCA-XXMB-0116-PGE	USCA-XXMB-0116-PGE
AG-F-C1 Choice Flat	USCA-XXMB-0117-PGE	USCA-XXMB-0117-PGE
AG-F-C1 Choice GR1	USCA-XXMB-0118-PGE	USCA-XXMB-0118-PGE
AG-F-C1 Prime Flat	USCA-XXMB-0119-PGE	USCA-XXMB-0119-PGE

AG-F-C1 Prime GR1	USCA-XXMB-0120-PGE	USCA-XXMB-0120-PGE
AG-F-C2 Choice Flat	USCA-XXMB-0121-PGE	USCA-XXMB-0121-PGE
AG-F-C2 Choice GR1	USCA-XXMB-0122-PGE	USCA-XXMB-0122-PGE
AG-F-C2 Prime Flat	USCA-XXMB-0123-PGE	USCA-XXMB-0123-PGE
AG-F-C2 Prime GR1	USCA-XXMB-0124-PGE	USCA-XXMB-0124-PGE
AG-F-C3 Choice Flat	USCA-XXMB-0125-PGE	USCA-XXMB-0125-PGE
AG-F-C3 Choice GR1	USCA-XXMB-0126-PGE	USCA-XXMB-0126-PGE
AG-F-C3 Prime Flat	USCA-XXMB-0127-PGE	USCA-XXMB-0127-PGE
AG-F-C3 Prime GR1	USCA-XXMB-0128-PGE	USCA-XXMB-0128-PGE
AG-R-A Choice Flat	USCA-XXMB-0129-PGE	USCA-XXMB-0129-PGE
AG-R-A Choice GR1	USCA-XXMB-0130-PGE	USCA-XXMB-0130-PGE
AG-R-A Prime Flat	USCA-XXMB-0131-PGE	USCA-XXMB-0131-PGE
AG-R-A Prime GR1	USCA-XXMB-0132-PGE	USCA-XXMB-0132-PGE
AG-R-B-P Choice Flat	USCA-XXMB-0133-PGE	USCA-XXMB-0133-PGE
AG-R-B-P Choice GR1	USCA-XXMB-0134-PGE	USCA-XXMB-0134-PGE
AG-R-B-P Prime Flat	USCA-XXMB-0135-PGE	USCA-XXMB-0135-PGE
AG-R-B-P Prime GR1	USCA-XXMB-0136-PGE	USCA-XXMB-0136-PGE
AG-R-B-S Choice Flat	USCA-XXMB-0137-PGE	USCA-XXMB-0137-PGE
AG-R-B-S Choice GR1	USCA-XXMB-0138-PGE	USCA-XXMB-0138-PGE
AG-R-B-S Prime Flat	USCA-XXMB-0139-PGE	USCA-XXMB-0139-PGE
AG-R-B-S Prime GR1	USCA-XXMB-0140-PGE	USCA-XXMB-0140-PGE
AG-R-B-T Choice Flat	USCA-XXMB-0141-PGE	USCA-XXMB-0141-PGE
AG-R-B-T Choice GR1	USCA-XXMB-0142-PGE	USCA-XXMB-0142-PGE
AG-R-B-T Prime Flat	USCA-XXMB-0143-PGE	USCA-XXMB-0143-PGE
AG-R-B-T Prime GR1	USCA-XXMB-0144-PGE	USCA-XXMB-0144-PGE
AG-V-A Choice Flat	USCA-XXMB-0145-PGE	USCA-XXMB-0145-PGE
AG-V-A Choice GR1	USCA-XXMB-0146-PGE	USCA-XXMB-0146-PGE
AG-V-A Prime Flat	USCA-XXMB-0147-PGE	USCA-XXMB-0147-PGE
AG-V-A Prime GR1	USCA-XXMB-0148-PGE	USCA-XXMB-0148-PGE
AG-V-B-P Choice Flat	USCA-XXMB-0149-PGE	USCA-XXMB-0149-PGE
AG-V-B-P Choice GR1	USCA-XXMB-0150-PGE	USCA-XXMB-0150-PGE
AG-V-B-P Prime Flat	USCA-XXMB-0151-PGE	USCA-XXMB-0151-PGE
AG-V-B-P Prime GR1	USCA-XXMB-0152-PGE	USCA-XXMB-0152-PGE
AG-V-B-S Choice Flat	USCA-XXMB-0153-PGE	USCA-XXMB-0153-PGE
AG-V-B-S Choice GR1	USCA-XXMB-0154-PGE	USCA-XXMB-0154-PGE
AG-V-B-S Prime Flat	USCA-XXMB-0155-PGE	USCA-XXMB-0155-PGE
AG-V-B-S Prime GR1	USCA-XXMB-0156-PGE	USCA-XXMB-0156-PGE
AG-V-B-T Choice Flat	USCA-XXMB-0157-PGE	USCA-XXMB-0157-PGE
AG-V-B-T Choice GR1	USCA-XXMB-0158-PGE	USCA-XXMB-0158-PGE
AG-V-B-T Prime Flat	USCA-XXMB-0159-PGE	USCA-XXMB-0159-PGE
AG-V-B-T Prime GR1	USCA-XXMB-0160-PGE	USCA-XXMB-0160-PGE

B-1 Choice Flat	USCA-XXMB-0161-PGE	USCA-XXMB-0161-PGE
B-1 Choice GR1	USCA-XXMB-0162-PGE	USCA-XXMB-0162-PGE
B-1 Prime Flat	USCA-XXMB-0163-PGE	USCA-XXMB-0163-PGE
B-1 Prime GR1	USCA-XXMB-0164-PGE	USCA-XXMB-0164-PGE
B-1-ST Choice Flat	USCA-XXMB-0165-PGE	USCA-XXMB-0165-PGE
B-1-ST Choice GR1	USCA-XXMB-0166-PGE	USCA-XXMB-0166-PGE
B-1-ST Prime Flat	USCA-XXMB-0167-PGE	USCA-XXMB-0167-PGE
B-1-ST Prime GR1	USCA-XXMB-0168-PGE	USCA-XXMB-0168-PGE
B-10-P Choice Flat	USCA-XXMB-0169-PGE	USCA-XXMB-0169-PGE
B-10-P Choice GR1	USCA-XXMB-0170-PGE	USCA-XXMB-0170-PGE
B-10-P Prime Flat	USCA-XXMB-0171-PGE	USCA-XXMB-0171-PGE
B-10-P Prime GR1	USCA-XXMB-0172-PGE	USCA-XXMB-0172-PGE
B-10-S Choice Flat	USCA-XXMB-0173-PGE	USCA-XXMB-0173-PGE
B-10-S Choice GR1	USCA-XXMB-0174-PGE	USCA-XXMB-0174-PGE
B-10-S Prime Flat	USCA-XXMB-0175-PGE	USCA-XXMB-0175-PGE
B-10-S Prime GR1	USCA-XXMB-0176-PGE	USCA-XXMB-0176-PGE
B-10-T Choice Flat	USCA-XXMB-0177-PGE	USCA-XXMB-0177-PGE
B-10-T Choice GR1	USCA-XXMB-0178-PGE	USCA-XXMB-0178-PGE
B-10-T Prime Flat	USCA-XXMB-0179-PGE	USCA-XXMB-0179-PGE
B-10-T Prime GR1	USCA-XXMB-0180-PGE	USCA-XXMB-0180-PGE
B-19-P Choice Flat	USCA-XXMB-0181-PGE	USCA-XXMB-0181-PGE
B-19-P Choice GR1	USCA-XXMB-0182-PGE	USCA-XXMB-0182-PGE
B-19-P Prime Flat	USCA-XXMB-0183-PGE	USCA-XXMB-0183-PGE
B-19-P Prime GR1	USCA-XXMB-0184-PGE	USCA-XXMB-0184-PGE
B-19-R-P Choice Flat	USCA-XXMB-0185-PGE	USCA-XXMB-0185-PGE
B-19-R-P Choice GR1	USCA-XXMB-0186-PGE	USCA-XXMB-0186-PGE
B-19-R-P Prime Flat	USCA-XXMB-0187-PGE	USCA-XXMB-0187-PGE
B-19-R-P Prime GR1	USCA-XXMB-0188-PGE	USCA-XXMB-0188-PGE
B-19-R-S Choice Flat	USCA-XXMB-0189-PGE	USCA-XXMB-0189-PGE
B-19-R-S Choice GR1	USCA-XXMB-0190-PGE	USCA-XXMB-0190-PGE
B-19-R-S Prime Flat	USCA-XXMB-0191-PGE	USCA-XXMB-0191-PGE
B-19-R-S Prime GR1	USCA-XXMB-0192-PGE	USCA-XXMB-0192-PGE
B-19-R-T Choice Flat	USCA-XXMB-0193-PGE	USCA-XXMB-0193-PGE
B-19-R-T Choice GR1	USCA-XXMB-0194-PGE	USCA-XXMB-0194-PGE
B-19-R-T Prime Flat	USCA-XXMB-0195-PGE	USCA-XXMB-0195-PGE
B-19-R-T Prime GR1	USCA-XXMB-0196-PGE	USCA-XXMB-0196-PGE
B-19-S Choice Flat	USCA-XXMB-0197-PGE	USCA-XXMB-0197-PGE
B-19-S Choice GR1	USCA-XXMB-0198-PGE	USCA-XXMB-0198-PGE
B-19-S Prime Flat	USCA-XXMB-0199-PGE	USCA-XXMB-0199-PGE
B-19-S Prime GR1	USCA-XXMB-0200-PGE	USCA-XXMB-0200-PGE
B-19-S-P Choice Flat	USCA-XXMB-0201-PGE	USCA-XXMB-0201-PGE

B-19-S-P Choice GR1	USCA-XXMB-0202-PGE	USCA-XXMB-0202-PGE
B-19-S-P Prime Flat	USCA-XXMB-0203-PGE	USCA-XXMB-0203-PGE
B-19-S-P Prime GR1	USCA-XXMB-0204-PGE	USCA-XXMB-0204-PGE
B-19-S-S Choice Flat	USCA-XXMB-0205-PGE	USCA-XXMB-0205-PGE
B-19-S-S Choice GR1	USCA-XXMB-0206-PGE	USCA-XXMB-0206-PGE
B-19-S-S Prime Flat	USCA-XXMB-0207-PGE	USCA-XXMB-0207-PGE
B-19-S-S Prime GR1	USCA-XXMB-0208-PGE	USCA-XXMB-0208-PGE
B-19-S-T Choice Flat	USCA-XXMB-0209-PGE	USCA-XXMB-0209-PGE
B-19-S-T Choice GR1	USCA-XXMB-0210-PGE	USCA-XXMB-0210-PGE
B-19-S-T Prime Flat	USCA-XXMB-0211-PGE	USCA-XXMB-0211-PGE
B-19-S-T Prime GR1	USCA-XXMB-0212-PGE	USCA-XXMB-0212-PGE
B-19-T Choice Flat	USCA-XXMB-0213-PGE	USCA-XXMB-0213-PGE
B-19-T Choice GR1	USCA-XXMB-0214-PGE	USCA-XXMB-0214-PGE
B-19-T Prime Flat	USCA-XXMB-0215-PGE	USCA-XXMB-0215-PGE
B-19-T Prime GR1	USCA-XXMB-0216-PGE	USCA-XXMB-0216-PGE
B-20-P Choice Flat	USCA-XXMB-0217-PGE	USCA-XXMB-0217-PGE
B-20-P Choice GR1	USCA-XXMB-0218-PGE	USCA-XXMB-0218-PGE
B-20-P Prime Flat	USCA-XXMB-0219-PGE	USCA-XXMB-0219-PGE
B-20-P Prime GR1	USCA-XXMB-0220-PGE	USCA-XXMB-0220-PGE
B-20-R-P Choice Flat	USCA-XXMB-0221-PGE	USCA-XXMB-0221-PGE
B-20-R-P Choice GR1	USCA-XXMB-0222-PGE	USCA-XXMB-0222-PGE
B-20-R-P Prime Flat	USCA-XXMB-0223-PGE	USCA-XXMB-0223-PGE
B-20-R-P Prime GR1	USCA-XXMB-0224-PGE	USCA-XXMB-0224-PGE
B-20-R-S Choice Flat	USCA-XXMB-0225-PGE	USCA-XXMB-0225-PGE
B-20-R-S Choice GR1	USCA-XXMB-0226-PGE	USCA-XXMB-0226-PGE
B-20-R-S Prime Flat	USCA-XXMB-0227-PGE	USCA-XXMB-0227-PGE
B-20-R-S Prime GR1	USCA-XXMB-0228-PGE	USCA-XXMB-0228-PGE
B-20-R-T Choice Flat	USCA-XXMB-0229-PGE	USCA-XXMB-0229-PGE
B-20-R-T Choice GR1	USCA-XXMB-0230-PGE	USCA-XXMB-0230-PGE
B-20-R-T Prime Flat	USCA-XXMB-0231-PGE	USCA-XXMB-0231-PGE
B-20-R-T Prime GR1	USCA-XXMB-0232-PGE	USCA-XXMB-0232-PGE
B-20-S Choice Flat	USCA-XXMB-0233-PGE	USCA-XXMB-0233-PGE
B-20-S Choice GR1	USCA-XXMB-0234-PGE	USCA-XXMB-0234-PGE
B-20-S Prime Flat	USCA-XXMB-0235-PGE	USCA-XXMB-0235-PGE
B-20-S Prime GR1	USCA-XXMB-0236-PGE	USCA-XXMB-0236-PGE
B-20-S-P Choice Flat	USCA-XXMB-0237-PGE	USCA-XXMB-0237-PGE
B-20-S-P Choice GR1	USCA-XXMB-0238-PGE	USCA-XXMB-0238-PGE
B-20-S-P Prime Flat	USCA-XXMB-0239-PGE	USCA-XXMB-0239-PGE
B-20-S-P Prime GR1	USCA-XXMB-0240-PGE	USCA-XXMB-0240-PGE
B-20-S-S Choice Flat	USCA-XXMB-0241-PGE	USCA-XXMB-0241-PGE
B-20-S-S Choice GR1	USCA-XXMB-0242-PGE	USCA-XXMB-0242-PGE

B-20-S-S Prime Flat	USCA-XXMB-0243-PGE	USCA-XXMB-0243-PGE
B-20-S-S Prime GR1	USCA-XXMB-0244-PGE	USCA-XXMB-0244-PGE
B-20-S-T Choice Flat	USCA-XXMB-0245-PGE	USCA-XXMB-0245-PGE
B-20-S-T Choice GR1	USCA-XXMB-0246-PGE	USCA-XXMB-0246-PGE
B-20-S-T Prime Flat	USCA-XXMB-0247-PGE	USCA-XXMB-0247-PGE
B-20-S-T Prime GR1	USCA-XXMB-0248-PGE	USCA-XXMB-0248-PGE
B-20-T Choice Flat	USCA-XXMB-0249-PGE	USCA-XXMB-0249-PGE
B-20-T Choice GR1	USCA-XXMB-0250-PGE	USCA-XXMB-0250-PGE
B-20-T Prime Flat	USCA-XXMB-0251-PGE	USCA-XXMB-0251-PGE
B-20-T Prime GR1	USCA-XXMB-0252-PGE	USCA-XXMB-0252-PGE
B-6 Choice Flat	USCA-XXMB-0253-PGE	USCA-XXMB-0253-PGE
B-6 Choice GR1	USCA-XXMB-0254-PGE	USCA-XXMB-0254-PGE
B-6 Prime Flat	USCA-XXMB-0255-PGE	USCA-XXMB-0255-PGE
B-6 Prime GR1	USCA-XXMB-0256-PGE	USCA-XXMB-0256-PGE
B-EV-1 Choice Flat	USCA-XXMB-0257-PGE	USCA-XXMB-0257-PGE
B-EV-1 Choice GR1	USCA-XXMB-0258-PGE	USCA-XXMB-0258-PGE
B-EV-1 Prime Flat	USCA-XXMB-0259-PGE	USCA-XXMB-0259-PGE
B-EV-1 Prime GR1	USCA-XXMB-0260-PGE	USCA-XXMB-0260-PGE
B-EV-2-P Choice Flat	USCA-XXMB-0261-PGE	USCA-XXMB-0261-PGE
B-EV-2-P Choice GR1	USCA-XXMB-0262-PGE	USCA-XXMB-0262-PGE
B-EV-2-P Prime Flat	USCA-XXMB-0263-PGE	USCA-XXMB-0263-PGE
B-EV-2-P Prime GR1	USCA-XXMB-0264-PGE	USCA-XXMB-0264-PGE
B-EV-2-S Choice Flat	USCA-XXMB-0265-PGE	USCA-XXMB-0265-PGE
B-EV-2-S Choice GR1	USCA-XXMB-0266-PGE	USCA-XXMB-0266-PGE
B-EV-2-S Prime Flat	USCA-XXMB-0267-PGE	USCA-XXMB-0267-PGE
B-EV-2-S Prime GR1	USCA-XXMB-0268-PGE	USCA-XXMB-0268-PGE
E-19-P Choice Flat	USCA-XXMB-0269-PGE	USCA-XXMB-0269-PGE
E-19-P Choice GR1	USCA-XXMB-0270-PGE	USCA-XXMB-0270-PGE
E-19-P Prime Flat	USCA-XXMB-0271-PGE	USCA-XXMB-0271-PGE
E-19-P Prime GR1	USCA-XXMB-0272-PGE	USCA-XXMB-0272-PGE
E-19-R-P Choice Flat	USCA-XXMB-0273-PGE	USCA-XXMB-0273-PGE
E-19-R-P Choice GR1	USCA-XXMB-0274-PGE	USCA-XXMB-0274-PGE
E-19-R-P Prime Flat	USCA-XXMB-0275-PGE	USCA-XXMB-0275-PGE
E-19-R-P Prime GR1	USCA-XXMB-0276-PGE	USCA-XXMB-0276-PGE
E-19-R-S Choice Flat	USCA-XXMB-0277-PGE	USCA-XXMB-0277-PGE
E-19-R-S Choice GR1	USCA-XXMB-0278-PGE	USCA-XXMB-0278-PGE
E-19-R-S Prime Flat	USCA-XXMB-0279-PGE	USCA-XXMB-0279-PGE
E-19-R-S Prime GR1	USCA-XXMB-0280-PGE	USCA-XXMB-0280-PGE
E-19-R-T Choice Flat	USCA-XXMB-0281-PGE	USCA-XXMB-0281-PGE
E-19-R-T Choice GR1	USCA-XXMB-0282-PGE	USCA-XXMB-0282-PGE
E-19-R-T Prime Flat	USCA-XXMB-0283-PGE	USCA-XXMB-0283-PGE

E-19-R-T Prime GR1	USCA-XXMB-0284-PGE	USCA-XXMB-0284-PGE
E-19-S Choice Flat	USCA-XXMB-0285-PGE	USCA-XXMB-0285-PGE
E-19-S Choice GR1	USCA-XXMB-0286-PGE	USCA-XXMB-0286-PGE
E-19-S Prime Flat	USCA-XXMB-0287-PGE	USCA-XXMB-0287-PGE
E-19-S Prime GR1	USCA-XXMB-0288-PGE	USCA-XXMB-0288-PGE
E-19-T Choice Flat	USCA-XXMB-0289-PGE	USCA-XXMB-0289-PGE
E-19-T Choice GR1	USCA-XXMB-0290-PGE	USCA-XXMB-0290-PGE
E-19-T Prime Flat	USCA-XXMB-0291-PGE	USCA-XXMB-0291-PGE
E-19-T Prime GR1	USCA-XXMB-0292-PGE	USCA-XXMB-0292-PGE
E-20-P Choice Flat	USCA-XXMB-0293-PGE	USCA-XXMB-0293-PGE
E-20-P Choice GR1	USCA-XXMB-0294-PGE	USCA-XXMB-0294-PGE
E-20-P Prime Flat	USCA-XXMB-0295-PGE	USCA-XXMB-0295-PGE
E-20-P Prime GR1	USCA-XXMB-0296-PGE	USCA-XXMB-0296-PGE
E-20-R-P Choice Flat	USCA-XXMB-0297-PGE	USCA-XXMB-0297-PGE
E-20-R-P Choice GR1	USCA-XXMB-0298-PGE	USCA-XXMB-0298-PGE
E-20-R-P Prime Flat	USCA-XXMB-0299-PGE	USCA-XXMB-0299-PGE
E-20-R-P Prime GR1	USCA-XXMB-0300-PGE	USCA-XXMB-0300-PGE
E-20-R-S Choice Flat	USCA-XXMB-0301-PGE	USCA-XXMB-0301-PGE
E-20-R-S Choice GR1	USCA-XXMB-0302-PGE	USCA-XXMB-0302-PGE
E-20-R-S Prime Flat	USCA-XXMB-0303-PGE	USCA-XXMB-0303-PGE
E-20-R-S Prime GR1	USCA-XXMB-0304-PGE	USCA-XXMB-0304-PGE
E-20-R-T Choice Flat	USCA-XXMB-0305-PGE	USCA-XXMB-0305-PGE
E-20-R-T Choice GR1	USCA-XXMB-0306-PGE	USCA-XXMB-0306-PGE
E-20-R-T Prime Flat	USCA-XXMB-0307-PGE	USCA-XXMB-0307-PGE
E-20-R-T Prime GR1	USCA-XXMB-0308-PGE	USCA-XXMB-0308-PGE
E-20-S Choice Flat	USCA-XXMB-0309-PGE	USCA-XXMB-0309-PGE
E-20-S Choice GR1	USCA-XXMB-0310-PGE	USCA-XXMB-0310-PGE
E-20-S Prime Flat	USCA-XXMB-0311-PGE	USCA-XXMB-0311-PGE
E-20-S Prime GR1	USCA-XXMB-0312-PGE	USCA-XXMB-0312-PGE
E-20-T Choice Flat	USCA-XXMB-0313-PGE	USCA-XXMB-0313-PGE
E-20-T Choice GR1	USCA-XXMB-0314-PGE	USCA-XXMB-0314-PGE
E-20-T Prime Flat	USCA-XXMB-0315-PGE	USCA-XXMB-0315-PGE
E-20-T Prime GR1	USCA-XXMB-0316-PGE	USCA-XXMB-0316-PGE
E-6 Choice Flat	USCA-XXMB-0317-PGE	USCA-XXMB-0317-PGE
E-6 Choice GR1	USCA-XXMB-0318-PGE	USCA-XXMB-0318-PGE
E-6 Prime Flat	USCA-XXMB-0319-PGE	USCA-XXMB-0319-PGE
E-6 Prime GR1	USCA-XXMB-0320-PGE	USCA-XXMB-0320-PGE
E-ELEC Choice Flat	USCA-XXMB-0321-PGE	USCA-XXMB-0321-PGE
E-ELEC Choice GR1	USCA-XXMB-0322-PGE	USCA-XXMB-0322-PGE
E-ELEC Prime Flat	USCA-XXMB-0323-PGE	USCA-XXMB-0323-PGE
E-ELEC Prime GR1	USCA-XXMB-0324-PGE	USCA-XXMB-0324-PGE

E-EV Choice Flat	USCA-XXMB-0325-PGE	USCA-XXMB-0325-PGE
E-EV Choice GR1	USCA-XXMB-0326-PGE	USCA-XXMB-0326-PGE
E-EV Prime Flat	USCA-XXMB-0327-PGE	USCA-XXMB-0327-PGE
E-EV Prime GR1	USCA-XXMB-0328-PGE	USCA-XXMB-0328-PGE
E-EV2-A Choice Flat	USCA-XXMB-0329-PGE	USCA-XXMB-0329-PGE
E-EV2-A Choice GR1	USCA-XXMB-0330-PGE	USCA-XXMB-0330-PGE
E-EV2-A Prime Flat	USCA-XXMB-0331-PGE	USCA-XXMB-0331-PGE
E-EV2-A Prime GR1	USCA-XXMB-0332-PGE	USCA-XXMB-0332-PGE
E-TOU-B Choice Flat	USCA-XXMB-0333-PGE	USCA-XXMB-0333-PGE
E-TOU-B Choice GR1	USCA-XXMB-0334-PGE	USCA-XXMB-0334-PGE
E-TOU-B Prime Flat	USCA-XXMB-0335-PGE	USCA-XXMB-0335-PGE
E-TOU-B Prime GR1	USCA-XXMB-0336-PGE	USCA-XXMB-0336-PGE
E-TOU-C Choice Flat	USCA-XXMB-0337-PGE	USCA-XXMB-0337-PGE
E-TOU-C Choice GR1	USCA-XXMB-0338-PGE	USCA-XXMB-0338-PGE
E-TOU-C Prime Flat	USCA-XXMB-0339-PGE	USCA-XXMB-0339-PGE
E-TOU-C Prime GR1	USCA-XXMB-0340-PGE	USCA-XXMB-0340-PGE
E-TOU-D Choice Flat	USCA-XXMB-0341-PGE	USCA-XXMB-0341-PGE
E-TOU-D Choice GR1	USCA-XXMB-0342-PGE	USCA-XXMB-0342-PGE
E-TOU-D Prime Flat	USCA-XXMB-0343-PGE	USCA-XXMB-0343-PGE
E-TOU-D Prime GR1	USCA-XXMB-0344-PGE	USCA-XXMB-0344-PGE
S-B-P Choice Flat	USCA-XXMB-0345-PGE	USCA-XXMB-0345-PGE
S-B-P Choice GR1	USCA-XXMB-0346-PGE	USCA-XXMB-0346-PGE
S-B-P Prime Flat	USCA-XXMB-0347-PGE	USCA-XXMB-0347-PGE
S-B-P Prime GR1	USCA-XXMB-0348-PGE	USCA-XXMB-0348-PGE
S-B-S Choice Flat	USCA-XXMB-0349-PGE	USCA-XXMB-0349-PGE
S-B-S Choice GR1	USCA-XXMB-0350-PGE	USCA-XXMB-0350-PGE
S-B-S Prime Flat	USCA-XXMB-0351-PGE	USCA-XXMB-0351-PGE
S-B-S Prime GR1	USCA-XXMB-0352-PGE	USCA-XXMB-0352-PGE
S-B-T Choice Flat	USCA-XXMB-0353-PGE	USCA-XXMB-0353-PGE
S-B-T Choice GR1	USCA-XXMB-0354-PGE	USCA-XXMB-0354-PGE
S-B-T Prime Flat	USCA-XXMB-0355-PGE	USCA-XXMB-0355-PGE
S-B-T Prime GR1	USCA-XXMB-0356-PGE	USCA-XXMB-0356-PGE
S-TOU-P Choice Flat	USCA-XXMB-0357-PGE	USCA-XXMB-0357-PGE
S-TOU-P Choice GR1	USCA-XXMB-0358-PGE	USCA-XXMB-0358-PGE
S-TOU-P Prime Flat	USCA-XXMB-0359-PGE	USCA-XXMB-0359-PGE
S-TOU-P Prime GR1	USCA-XXMB-0360-PGE	USCA-XXMB-0360-PGE
S-TOU-S Choice Flat	USCA-XXMB-0361-PGE	USCA-XXMB-0361-PGE
S-TOU-S Choice GR1	USCA-XXMB-0362-PGE	USCA-XXMB-0362-PGE
S-TOU-S Prime Flat	USCA-XXMB-0363-PGE	USCA-XXMB-0363-PGE
S-TOU-S Prime GR1	USCA-XXMB-0364-PGE	USCA-XXMB-0364-PGE
S-TOU-T Choice Flat	USCA-XXMB-0365-PGE	USCA-XXMB-0365-PGE

S-TOU-T Choice GR1	USCA-XXMB-0366-PGE	USCA-XXMB-0366-PGE
S-TOU-T Prime Flat	USCA-XXMB-0367-PGE	USCA-XXMB-0367-PGE
S-TOU-T Prime GR1	USCA-XXMB-0368-PGE	USCA-XXMB-0368-PGE
AL-2-GF	USCA-XXMB-0001-SCE	USCA-XXMB-0001-SCE
TOU-8-PRI-B	USCA-XXMB-0002-SCE	USCA-XXMB-0002-SCE
TOU-8-PRI-D	USCA-XXMB-0003-SCE	USCA-XXMB-0003-SCE
TOU-8-PRI-E	USCA-XXMB-0004-SCE	USCA-XXMB-0004-SCE
TOU-8-PRI-R	USCA-XXMB-0005-SCE	USCA-XXMB-0005-SCE
TOU-8-PRI-RBU	USCA-XXMB-0006-SCE	USCA-XXMB-0006-SCE
TOU-8-SEC-B	USCA-XXMB-0007-SCE	USCA-XXMB-0007-SCE
TOU-8-SEC-D	USCA-XXMB-0008-SCE	USCA-XXMB-0008-SCE
TOU-8-SEC-E	USCA-XXMB-0009-SCE	USCA-XXMB-0009-SCE
TOU-8-SEC-R	USCA-XXMB-0010-SCE	USCA-XXMB-0010-SCE
TOU-8-SEC-RBU	USCA-XXMB-0011-SCE	USCA-XXMB-0011-SCE
TOU-8-SUB-B	USCA-XXMB-0012-SCE	USCA-XXMB-0012-SCE
TOU-8-SUB-D	USCA-XXMB-0013-SCE	USCA-XXMB-0013-SCE
TOU-8-SUB-E	USCA-XXMB-0014-SCE	USCA-XXMB-0014-SCE
TOU-8-SUB-R	USCA-XXMB-0015-SCE	USCA-XXMB-0015-SCE
TOU-8-SUB-RBU	USCA-XXMB-0016-SCE	USCA-XXMB-0016-SCE
TOU-8-TRS-B	USCA-XXMB-0017-SCE	USCA-XXMB-0017-SCE
TOU-8-TRS-D	USCA-XXMB-0018-SCE	USCA-XXMB-0018-SCE
TOU-8-TRS-E	USCA-XXMB-0019-SCE	USCA-XXMB-0019-SCE
TOU-8-TRS-R	USCA-XXMB-0020-SCE	USCA-XXMB-0020-SCE
TOU-8-TRS-RBU	USCA-XXMB-0021-SCE	USCA-XXMB-0021-SCE
TOU-D-4	USCA-XXMB-0022-SCE	USCA-XXMB-0022-SCE
TOU-D-5	USCA-XXMB-0023-SCE	USCA-XXMB-0023-SCE
TOU-D-A	USCA-XXMB-0024-SCE	USCA-XXMB-0024-SCE
TOU-D-B	USCA-XXMB-0025-SCE	USCA-XXMB-0025-SCE
TOU-D-PRIME	USCA-XXMB-0026-SCE	USCA-XXMB-0026-SCE
TOU-D-T	USCA-XXMB-0027-SCE	USCA-XXMB-0027-SCE
TOU-EV-1	USCA-XXMB-0028-SCE	USCA-XXMB-0028-SCE
TOU-EV-7-PRI	USCA-XXMB-0029-SCE	USCA-XXMB-0029-SCE
TOU-EV-7-SEC	USCA-XXMB-0030-SCE	USCA-XXMB-0030-SCE
TOU-EV-7-SUB	USCA-XXMB-0031-SCE	USCA-XXMB-0031-SCE
TOU-EV-7-TRS	USCA-XXMB-0032-SCE	USCA-XXMB-0032-SCE
TOU-EV-8-PRI	USCA-XXMB-0033-SCE	USCA-XXMB-0033-SCE
TOU-EV-8-SEC	USCA-XXMB-0034-SCE	USCA-XXMB-0034-SCE
TOU-EV-8-SUB	USCA-XXMB-0035-SCE	USCA-XXMB-0035-SCE
TOU-EV-8-TRS	USCA-XXMB-0036-SCE	USCA-XXMB-0036-SCE
TOU-EV-9-PRI	USCA-XXMB-0037-SCE	USCA-XXMB-0037-SCE
TOU-EV-9-SEC	USCA-XXMB-0038-SCE	USCA-XXMB-0038-SCE

TOU-EV-9-SUB	USCA-XXMB-0039-SCE	USCA-XXMB-0039-SCE
TOU-EV-9-TRS	USCA-XXMB-0040-SCE	USCA-XXMB-0040-SCE
TOU-GS-1-A	USCA-XXMB-0041-SCE	USCA-XXMB-0041-SCE
TOU-GS-1-B	USCA-XXMB-0042-SCE	USCA-XXMB-0042-SCE
TOU-GS-1-PRI-D	USCA-XXMB-0043-SCE	USCA-XXMB-0043-SCE
TOU-GS-1-PRI-E	USCA-XXMB-0044-SCE	USCA-XXMB-0044-SCE
TOU-GS-1-PRI-ES	USCA-XXMB-0045-SCE	USCA-XXMB-0045-SCE
TOU-GS-1-SEC-D	USCA-XXMB-0046-SCE	USCA-XXMB-0046-SCE
TOU-GS-1-SEC-E	USCA-XXMB-0047-SCE	USCA-XXMB-0047-SCE
TOU-GS-1-SEC-ES	USCA-XXMB-0048-SCE	USCA-XXMB-0048-SCE
TOU-GS-1-SUB-D	USCA-XXMB-0049-SCE	USCA-XXMB-0049-SCE
TOU-GS-1-SUB-E	USCA-XXMB-0050-SCE	USCA-XXMB-0050-SCE
TOU-GS-1-SUB-ES	USCA-XXMB-0051-SCE	USCA-XXMB-0051-SCE
TOU-GS-1-TRS-D	USCA-XXMB-0052-SCE	USCA-XXMB-0052-SCE
TOU-GS-1-TRS-E	USCA-XXMB-0053-SCE	USCA-XXMB-0053-SCE
TOU-GS-1-TRS-ES	USCA-XXMB-0054-SCE	USCA-XXMB-0054-SCE
TOU-GS-2-B	USCA-XXMB-0055-SCE	USCA-XXMB-0055-SCE
TOU-GS-2-PRI-D	USCA-XXMB-0056-SCE	USCA-XXMB-0056-SCE
TOU-GS-2-PRI-E	USCA-XXMB-0057-SCE	USCA-XXMB-0057-SCE
TOU-GS-2-R	USCA-XXMB-0058-SCE	USCA-XXMB-0058-SCE
TOU-GS-2-SEC-D	USCA-XXMB-0059-SCE	USCA-XXMB-0059-SCE
TOU-GS-2-SEC-E	USCA-XXMB-0060-SCE	USCA-XXMB-0060-SCE
TOU-GS-2-SUB-D	USCA-XXMB-0061-SCE	USCA-XXMB-0061-SCE
TOU-GS-2-SUB-E	USCA-XXMB-0062-SCE	USCA-XXMB-0062-SCE
TOU-GS-2-TRS-D	USCA-XXMB-0063-SCE	USCA-XXMB-0063-SCE
TOU-GS-2-TRS-E	USCA-XXMB-0064-SCE	USCA-XXMB-0064-SCE
TOU-GS-3-B	USCA-XXMB-0065-SCE	USCA-XXMB-0065-SCE
TOU-GS-3-PRI-D	USCA-XXMB-0066-SCE	USCA-XXMB-0066-SCE
TOU-GS-3-PRI-E	USCA-XXMB-0067-SCE	USCA-XXMB-0067-SCE
TOU-GS-3-R	USCA-XXMB-0068-SCE	USCA-XXMB-0068-SCE
TOU-GS-3-SEC-D	USCA-XXMB-0069-SCE	USCA-XXMB-0069-SCE
TOU-GS-3-SEC-E	USCA-XXMB-0070-SCE	USCA-XXMB-0070-SCE
TOU-GS-3-SUB-D	USCA-XXMB-0071-SCE	USCA-XXMB-0071-SCE
TOU-GS-3-SUB-E	USCA-XXMB-0072-SCE	USCA-XXMB-0072-SCE
TOU-GS-3-TRS-D	USCA-XXMB-0073-SCE	USCA-XXMB-0073-SCE
TOU-GS-3-TRS-E	USCA-XXMB-0074-SCE	USCA-XXMB-0074-SCE
TOU-PA-2-A	USCA-XXMB-0075-SCE	USCA-XXMB-0075-SCE
TOU-PA-2-B	USCA-XXMB-0076-SCE	USCA-XXMB-0076-SCE
TOU-PA-2-PRI-D	USCA-XXMB-0077-SCE	USCA-XXMB-0077-SCE
TOU-PA-2-PRI-D5	USCA-XXMB-0078-SCE	USCA-XXMB-0078-SCE
TOU-PA-2-PRI-E	USCA-XXMB-0079-SCE	USCA-XXMB-0079-SCE

TOU-PA-2-PRI-E5	USCA-XXMB-0080-SCE	USCA-XXMB-0080-SCE
TOU-PA-2-SEC-D	USCA-XXMB-0081-SCE	USCA-XXMB-0081-SCE
TOU-PA-2-SEC-D5	USCA-XXMB-0082-SCE	USCA-XXMB-0082-SCE
TOU-PA-2-SEC-E	USCA-XXMB-0083-SCE	USCA-XXMB-0083-SCE
TOU-PA-2-SEC-E5	USCA-XXMB-0084-SCE	USCA-XXMB-0084-SCE
TOU-PA-2-SUB-D	USCA-XXMB-0085-SCE	USCA-XXMB-0085-SCE
TOU-PA-2-SUB-D5	USCA-XXMB-0086-SCE	USCA-XXMB-0086-SCE
TOU-PA-2-SUB-E	USCA-XXMB-0087-SCE	USCA-XXMB-0087-SCE
TOU-PA-2-SUB-E5	USCA-XXMB-0088-SCE	USCA-XXMB-0088-SCE
TOU-PA-2-TRS-D	USCA-XXMB-0089-SCE	USCA-XXMB-0089-SCE
TOU-PA-2-TRS-D5	USCA-XXMB-0090-SCE	USCA-XXMB-0090-SCE
TOU-PA-2-TRS-E	USCA-XXMB-0091-SCE	USCA-XXMB-0091-SCE
TOU-PA-2-TRS-E5	USCA-XXMB-0092-SCE	USCA-XXMB-0092-SCE
TOU-PA-3-A	USCA-XXMB-0093-SCE	USCA-XXMB-0093-SCE
TOU-PA-3-B	USCA-XXMB-0094-SCE	USCA-XXMB-0094-SCE
TOU-PA-3-PRI-D	USCA-XXMB-0095-SCE	USCA-XXMB-0095-SCE
TOU-PA-3-PRI-D5	USCA-XXMB-0096-SCE	USCA-XXMB-0096-SCE
TOU-PA-3-PRI-E	USCA-XXMB-0097-SCE	USCA-XXMB-0097-SCE
TOU-PA-3-PRI-E5	USCA-XXMB-0098-SCE	USCA-XXMB-0098-SCE
TOU-PA-3-SEC-D	USCA-XXMB-0099-SCE	USCA-XXMB-0099-SCE
TOU-PA-3-SEC-D5	USCA-XXMB-0100-SCE	USCA-XXMB-0100-SCE
TOU-PA-3-SEC-E	USCA-XXMB-0101-SCE	USCA-XXMB-0101-SCE
TOU-PA-3-SEC-E5	USCA-XXMB-0102-SCE	USCA-XXMB-0102-SCE
TOU-PA-3-SUB-D	USCA-XXMB-0103-SCE	USCA-XXMB-0103-SCE
TOU-PA-3-SUB-D5	USCA-XXMB-0104-SCE	USCA-XXMB-0104-SCE
TOU-PA-3-SUB-E	USCA-XXMB-0105-SCE	USCA-XXMB-0105-SCE
TOU-PA-3-SUB-E5	USCA-XXMB-0106-SCE	USCA-XXMB-0106-SCE
TOU-PA-3-TRS-D	USCA-XXMB-0107-SCE	USCA-XXMB-0107-SCE
TOU-PA-3-TRS-D5	USCA-XXMB-0108-SCE	USCA-XXMB-0108-SCE
TOU-PA-3-TRS-E	USCA-XXMB-0109-SCE	USCA-XXMB-0109-SCE
TOU-PA-3-TRS-E5	USCA-XXMB-0110-SCE	USCA-XXMB-0110-SCE
AL-2-GF-3Cprime	USCA-XXMB-0111-SCE	USCA-XXMB-0111-SCE
TOU-8-PRI-B-3Cprime	USCA-XXMB-0112-SCE	USCA-XXMB-0112-SCE
TOU-8-PRI-D-3Cprime	USCA-XXMB-0113-SCE	USCA-XXMB-0113-SCE
TOU-8-PRI-E-3Cprime	USCA-XXMB-0114-SCE	USCA-XXMB-0114-SCE
TOU-8-PRI-R-3Cprime	USCA-XXMB-0115-SCE	USCA-XXMB-0115-SCE
TOU-8-PRI-RBU-3Cprime	USCA-XXMB-0116-SCE	USCA-XXMB-0116-SCE
TOU-8-SEC-B-3Cprime	USCA-XXMB-0117-SCE	USCA-XXMB-0117-SCE
TOU-8-SEC-D-3Cprime	USCA-XXMB-0118-SCE	USCA-XXMB-0118-SCE
TOU-8-SEC-E-3Cprime	USCA-XXMB-0119-SCE	USCA-XXMB-0119-SCE
TOU-8-SEC-R-3Cprime	USCA-XXMB-0120-SCE	USCA-XXMB-0120-SCE

TOU-8-SEC-RBU-3Cprime	USCA-XXMB-0121-SCE	USCA-XXMB-0121-SCE
TOU-8-SUB-B-3Cprime	USCA-XXMB-0122-SCE	USCA-XXMB-0122-SCE
TOU-8-SUB-D-3Cprime	USCA-XXMB-0123-SCE	USCA-XXMB-0123-SCE
TOU-8-SUB-E-3Cprime	USCA-XXMB-0124-SCE	USCA-XXMB-0124-SCE
TOU-8-SUB-R-3Cprime	USCA-XXMB-0125-SCE	USCA-XXMB-0125-SCE
TOU-8-SUB-RBU-3Cprime	USCA-XXMB-0126-SCE	USCA-XXMB-0126-SCE
TOU-8-TRS-B-3Cprime	USCA-XXMB-0127-SCE	USCA-XXMB-0127-SCE
TOU-8-TRS-D-3Cprime	USCA-XXMB-0128-SCE	USCA-XXMB-0128-SCE
TOU-8-TRS-E-3Cprime	USCA-XXMB-0129-SCE	USCA-XXMB-0129-SCE
TOU-8-TRS-R-3Cprime	USCA-XXMB-0130-SCE	USCA-XXMB-0130-SCE
TOU-8-TRS-RBU-3Cprime	USCA-XXMB-0131-SCE	USCA-XXMB-0131-SCE
TOU-D-4-3Cprime	USCA-XXMB-0132-SCE	USCA-XXMB-0132-SCE
TOU-D-5-3Cprime	USCA-XXMB-0133-SCE	USCA-XXMB-0133-SCE
TOU-D-A-3Cprime	USCA-XXMB-0134-SCE	USCA-XXMB-0134-SCE
TOU-D-B-3Cprime	USCA-XXMB-0135-SCE	USCA-XXMB-0135-SCE
TOU-D-PRIME-3Cprime	USCA-XXMB-0136-SCE	USCA-XXMB-0136-SCE
TOU-D-T-3Cprime	USCA-XXMB-0137-SCE	USCA-XXMB-0137-SCE
TOU-EV-1-3Cprime	USCA-XXMB-0138-SCE	USCA-XXMB-0138-SCE
TOU-EV-7-PRI-3Cprime	USCA-XXMB-0139-SCE	USCA-XXMB-0139-SCE
TOU-EV-7-SEC-3Cprime	USCA-XXMB-0140-SCE	USCA-XXMB-0140-SCE
TOU-EV-7-SUB-3Cprime	USCA-XXMB-0141-SCE	USCA-XXMB-0141-SCE
TOU-EV-7-TRS-3Cprime	USCA-XXMB-0142-SCE	USCA-XXMB-0142-SCE
TOU-EV-8-PRI-3Cprime	USCA-XXMB-0143-SCE	USCA-XXMB-0143-SCE
TOU-EV-8-SEC-3Cprime	USCA-XXMB-0144-SCE	USCA-XXMB-0144-SCE
TOU-EV-8-SUB-3Cprime	USCA-XXMB-0145-SCE	USCA-XXMB-0145-SCE
TOU-EV-8-TRS-3Cprime	USCA-XXMB-0146-SCE	USCA-XXMB-0146-SCE
TOU-EV-9-PRI-3Cprime	USCA-XXMB-0147-SCE	USCA-XXMB-0147-SCE
TOU-EV-9-SEC-3Cprime	USCA-XXMB-0148-SCE	USCA-XXMB-0148-SCE
TOU-EV-9-SUB-3Cprime	USCA-XXMB-0149-SCE	USCA-XXMB-0149-SCE
TOU-EV-9-TRS-3Cprime	USCA-XXMB-0150-SCE	USCA-XXMB-0150-SCE
TOU-GS-1-A-3Cprime	USCA-XXMB-0151-SCE	USCA-XXMB-0151-SCE
TOU-GS-1-B-3Cprime	USCA-XXMB-0152-SCE	USCA-XXMB-0152-SCE
TOU-GS-1-PRI-D-3Cprime	USCA-XXMB-0153-SCE	USCA-XXMB-0153-SCE
TOU-GS-1-PRI-E-3Cprime	USCA-XXMB-0154-SCE	USCA-XXMB-0154-SCE
TOU-GS-1-PRI-ES-3Cprime	USCA-XXMB-0155-SCE	USCA-XXMB-0155-SCE
TOU-GS-1-SEC-D-3Cprime	USCA-XXMB-0156-SCE	USCA-XXMB-0156-SCE
TOU-GS-1-SEC-E-3Cprime	USCA-XXMB-0157-SCE	USCA-XXMB-0157-SCE

TOU-GS-1-SEC-ES-3Cprime	USCA-XXMB-0158-SCE	USCA-XXMB-0158-SCE
TOU-GS-1-SUB-D-3Cprime	USCA-XXMB-0159-SCE	USCA-XXMB-0159-SCE
TOU-GS-1-SUB-E-3Cprime	USCA-XXMB-0160-SCE	USCA-XXMB-0160-SCE
TOU-GS-1-SUB-ES-3Cprime	USCA-XXMB-0161-SCE	USCA-XXMB-0161-SCE
TOU-GS-1-TRS-D-3Cprime	USCA-XXMB-0162-SCE	USCA-XXMB-0162-SCE
TOU-GS-1-TRS-E-3Cprime	USCA-XXMB-0163-SCE	USCA-XXMB-0163-SCE
TOU-GS-1-TRS-ES-3Cprime	USCA-XXMB-0164-SCE	USCA-XXMB-0164-SCE
TOU-GS-2-B-3Cprime	USCA-XXMB-0165-SCE	USCA-XXMB-0165-SCE
TOU-GS-2-PRI-D-3Cprime	USCA-XXMB-0166-SCE	USCA-XXMB-0166-SCE
TOU-GS-2-PRI-E-3Cprime	USCA-XXMB-0167-SCE	USCA-XXMB-0167-SCE
TOU-GS-2-R-3Cprime	USCA-XXMB-0168-SCE	USCA-XXMB-0168-SCE
TOU-GS-2-SEC-D-3Cprime	USCA-XXMB-0169-SCE	USCA-XXMB-0169-SCE
TOU-GS-2-SEC-E-3Cprime	USCA-XXMB-0170-SCE	USCA-XXMB-0170-SCE
TOU-GS-2-SUB-D-3Cprime	USCA-XXMB-0171-SCE	USCA-XXMB-0171-SCE
TOU-GS-2-SUB-E-3Cprime	USCA-XXMB-0172-SCE	USCA-XXMB-0172-SCE
TOU-GS-2-TRS-D-3Cprime	USCA-XXMB-0173-SCE	USCA-XXMB-0173-SCE
TOU-GS-2-TRS-E-3Cprime	USCA-XXMB-0174-SCE	USCA-XXMB-0174-SCE
TOU-GS-3-B-3Cprime	USCA-XXMB-0175-SCE	USCA-XXMB-0175-SCE
TOU-GS-3-PRI-D-3Cprime	USCA-XXMB-0176-SCE	USCA-XXMB-0176-SCE
TOU-GS-3-PRI-E-3Cprime	USCA-XXMB-0177-SCE	USCA-XXMB-0177-SCE
TOU-GS-3-R-3Cprime	USCA-XXMB-0178-SCE	USCA-XXMB-0178-SCE
TOU-GS-3-SEC-D-3Cprime	USCA-XXMB-0179-SCE	USCA-XXMB-0179-SCE
TOU-GS-3-SEC-E-3Cprime	USCA-XXMB-0180-SCE	USCA-XXMB-0180-SCE
TOU-GS-3-SUB-D-3Cprime	USCA-XXMB-0181-SCE	USCA-XXMB-0181-SCE
TOU-GS-3-SUB-E-3Cprime	USCA-XXMB-0182-SCE	USCA-XXMB-0182-SCE
TOU-GS-3-TRS-D-3Cprime	USCA-XXMB-0183-SCE	USCA-XXMB-0183-SCE
TOU-GS-3-TRS-E-3Cprime	USCA-XXMB-0184-SCE	USCA-XXMB-0184-SCE

TOU-PA-2-A-3Cprime	USCA-XXMB-0185-SCE	USCA-XXMB-0185-SCE
TOU-PA-2-B-3Cprime	USCA-XXMB-0186-SCE	USCA-XXMB-0186-SCE
TOU-PA-2-PRI-D-3Cprime	USCA-XXMB-0187-SCE	USCA-XXMB-0187-SCE
TOU-PA-2-PRI-D5-3Cprime	USCA-XXMB-0188-SCE	USCA-XXMB-0188-SCE
TOU-PA-2-PRI-E-3Cprime	USCA-XXMB-0189-SCE	USCA-XXMB-0189-SCE
TOU-PA-2-PRI-E5-3Cprime	USCA-XXMB-0190-SCE	USCA-XXMB-0190-SCE
TOU-PA-2-SEC-D-3Cprime	USCA-XXMB-0191-SCE	USCA-XXMB-0191-SCE
TOU-PA-2-SEC-D5-3Cprime	USCA-XXMB-0192-SCE	USCA-XXMB-0192-SCE
TOU-PA-2-SEC-E-3Cprime	USCA-XXMB-0193-SCE	USCA-XXMB-0193-SCE
TOU-PA-2-SEC-E5-3Cprime	USCA-XXMB-0194-SCE	USCA-XXMB-0194-SCE
TOU-PA-2-SUB-D-3Cprime	USCA-XXMB-0195-SCE	USCA-XXMB-0195-SCE
TOU-PA-2-SUB-D5-3Cprime	USCA-XXMB-0196-SCE	USCA-XXMB-0196-SCE
TOU-PA-2-SUB-E-3Cprime	USCA-XXMB-0197-SCE	USCA-XXMB-0197-SCE
TOU-PA-2-SUB-E5-3Cprime	USCA-XXMB-0198-SCE	USCA-XXMB-0198-SCE
TOU-PA-2-TRS-D-3Cprime	USCA-XXMB-0199-SCE	USCA-XXMB-0199-SCE
TOU-PA-2-TRS-D5-3Cprime	USCA-XXMB-0200-SCE	USCA-XXMB-0200-SCE
TOU-PA-2-TRS-E-3Cprime	USCA-XXMB-0201-SCE	USCA-XXMB-0201-SCE
TOU-PA-2-TRS-E5-3Cprime	USCA-XXMB-0202-SCE	USCA-XXMB-0202-SCE
TOU-PA-3-A-3Cprime	USCA-XXMB-0203-SCE	USCA-XXMB-0203-SCE
TOU-PA-3-B-3Cprime	USCA-XXMB-0204-SCE	USCA-XXMB-0204-SCE
TOU-PA-3-PRI-D-3Cprime	USCA-XXMB-0205-SCE	USCA-XXMB-0205-SCE
TOU-PA-3-PRI-D5-3Cprime	USCA-XXMB-0206-SCE	USCA-XXMB-0206-SCE
TOU-PA-3-PRI-E-3Cprime	USCA-XXMB-0207-SCE	USCA-XXMB-0207-SCE
TOU-PA-3-PRI-E5-3Cprime	USCA-XXMB-0208-SCE	USCA-XXMB-0208-SCE
TOU-PA-3-SEC-D-3Cprime	USCA-XXMB-0209-SCE	USCA-XXMB-0209-SCE
TOU-PA-3-SEC-D5-3Cprime	USCA-XXMB-0210-SCE	USCA-XXMB-0210-SCE

TOU-PA-3-SEC-E-3Cprime	USCA-XXMB-0211-SCE	USCA-XXMB-0211-SCE
TOU-PA-3-SEC-E5-3Cprime	USCA-XXMB-0212-SCE	USCA-XXMB-0212-SCE
TOU-PA-3-SUB-D-3Cprime	USCA-XXMB-0213-SCE	USCA-XXMB-0213-SCE
TOU-PA-3-SUB-D5-3Cprime	USCA-XXMB-0214-SCE	USCA-XXMB-0214-SCE
TOU-PA-3-SUB-E-3Cprime	USCA-XXMB-0215-SCE	USCA-XXMB-0215-SCE
TOU-PA-3-SUB-E5-3Cprime	USCA-XXMB-0216-SCE	USCA-XXMB-0216-SCE
TOU-PA-3-TRS-D-3Cprime	USCA-XXMB-0217-SCE	USCA-XXMB-0217-SCE
TOU-PA-3-TRS-D5-3Cprime	USCA-XXMB-0218-SCE	USCA-XXMB-0218-SCE
TOU-PA-3-TRS-E-3Cprime	USCA-XXMB-0219-SCE	USCA-XXMB-0219-SCE
TOU-PA-3-TRS-E5-3Cprime	USCA-XXMB-0220-SCE	USCA-XXMB-0220-SCE