

Item	Form	Form Description	Responding Entity	Responding Person	Response Date	Response Mode	Comment	Status
							CEC-1304 Schedule 2 Part B Instructions. Number the columns on the form to correspond to the numbers on the instructions. Col. 1 Month, Col. 2 Onsite Use (self-gen) MWh, Col. 3 Sales for Resale MWh, etc. Not consistent in method of marking footnotes. On this form asterisks are used, on Schedule 2 Part A Addendum Form numerical markers are used. Instructions for End User NAICS Code is not consistent with labeling of the column on Schedule 2 Part B Form which says: Customer Classification Code End-User. Make instruction line and column label the same. On the instructions it is not clear that the End User NAICS Code is to include customers only and not Onsite User NAICS Code.	Michael Nyberg updated form and instructions to address the General Mills' concern.
4	1304	Electric Generator Information	SMUD	Tom Fischbach	12/18/2007	Email	Column for "Available MW @ System Peak", has this been discontinued from reporting in 1304 ?	Michael Nyberg contacted SMUD to answer question. Changes to form and instructions are not necessary.
5	1304	Electric Generator Information	Aera Energy LLC	James P. Mosher	12/19/2007	Email	1. Add a form of Declaration for attestation regarding confidentiality of data, similar to the Sample Declaration provided as Appendix D (page D-1). Declaration should include blanks for declarant to specify the category of information that is entitled to be designated as confidential (e.g. fuel cost data for individual electric generators), and a statement that information has not been previously released. (Reference "Release of Data" criteria on page 8 of Draft.) 2. Schedule 2, Part A Addendum: Cogeneration and Fuel Use by Generator Quarterly Report--Correct the sixth column subheading as follows: "Fuel Attributable to Cogeneration" should be corrected to read "Fuel Attributable to Useful Thermal Output" Correct the twelfth column subheading as follows: "Fuel Attributable to Cogeneration" should be corrected to read "Fuel Attributable to Useful Thermal Output" Replace the phrase "physical units" in instruction No. 1 (page 21) and instruction No. 2 (page 21) with the phrase "MCF." Replace the word "amount" in instruction No. 4 (page 21) and instruction No. 8 (page 22) with the word "portion." Replace the word "Cogeneration" in the header to instruction No. 8 (page 22) with the phrase "Useful Thermal Output."	Michael Nyberg updated form and instructions to address the Aera's concern.

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6	1304	Electric Generator Information	Geyers Power Company LLC	Dean Cooley	12/19/2007	Email	Line 4h asks for "Operating Mode" and line 4i asks for "Interconnection Agreement Type" to be entered; however the instructions for this Schedule on Draft page 18 do not provide a listing of possible 'Mode' and 'Agreement Type' similar to those provided for "Operating Status" at the top of Draft page 19. It would help clarify what is expected if a similar listing for lines 4h and 4i were provided in the instructions. We assume possible Modes would include Baseload, Peaking, and perhaps Load-following; but we are unclear as to what Agreement Type(s) the Commission expects to see.	Michael Nyberg updated form and instructions to address the Geyser Power's concern.
							In the revised instructions for Section 2 of CEC-1304 Schedule 3 Part A, distributed on December 12 th , line 2c requests that "If equipment is being used, list the equipment manufacturer". It is not immediately clear if 2c is related to the 'wastewater disposal method' in line 2a, which in our case would be "Injection Well", or possibly to the 'average total dissolved solids' in line 2b. As there is no period at the end of line 2c, is it possible that some wording as to what this line relates to was omitted?	Staff will address this concern.
7	1304	Electric Generator Information	LADWP	Avin Chan	12/21/2007	Email	In the "Changes in Reporting Requirements", the column labeled "How often submitted?", I see nowhere that power plants greater or equal to 10 MW would be reported. However, page 17 of the draft instructions for schedule 1 and 2 indicate that these forms are used for all size of generation but only an annual reporting on Feb 15 are facilities of 1MW to 10MW reported (for this reporting I assume that solar panels that are less than 1MW aggregated at any site are not reported).	Andrea Gough updated Appendix B to clarify how often CEC-1304 is submitted.
8	1306	Electricity Sales and Delivery Information	Association of Bay Area Governments	Vina Maharaj	12/14/2007	Email	There are several more changes being made to the current CEC-1306 forms, rather than just the change of "customer classification" column in place of NAICS code. We notice the following additional changes being made: The Column "Fuel Type" is being eliminated. The Columns "Year", "Month", "Company Number" and "County Number" are being switched. The Column titled "Sales (MWh or million therms)" is being changed to "Sales/Delivery (therms)". An additional Column is being added titled "Revenue (\$). We would appreciate if all the changes are very clearly indicated. The column titled "Sales/Delivery (therms)" rather than "million therms" will impact our current calculating methods, therefore, we need to make sure that the titles are clearly worded.	Staff will address this concern.

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9	1306	Electricity Sales and Delivery Information	Association of Bay Area Governments	Jerry Lahr	12/14/2007	Email	Comment regarding "Revenue." This term needs to be clearly defined. That is, what is included in revenue? For example, we implement what is know as "ESP Consolidated Billing," which means that we bill the end customer for PG&E transportation and other costs. These items are considered revenue to us, although they are offset by an equal expense when we pay it to PG&E. My concern is that if you also ask PG&E for their "revenue" you may double count these costs.	Andrea Gough updated instructions to address ABA's concern.
10	1306	Electricity Sales and Delivery Information	Commerce Energy, Inc.	Ann Hendrickson	12/11/2007	Email	We have <200 MW of retail load in California market, therefore are we exempt from data-reporting -- as is true for your IEPFR forms?	Andrea Gough contacted Commerce Energy to clarify that there is no size threshold when completing the CEC-1306 forms
11	1306	Electricity Sales and Delivery Information	SCE	Manuel Alvarez	12/18/2007	Email/ Docket	Typically, SCE enters into tolling agreements with specific counterparties that operate several generating units. The amount of natural gas delivered under these agreements is measured by the counterparty and is not separately metered by unit. Thus, it would not be possible for SCE to provide the delivered gas amount on a per unit basis as requested in Form 1306 D. Instead, SCE would be able to provide the amount delivered by counterparty. In addition, the natural gas provided to SCE's counterparties is delivered through SCE's overall natural gas portfolio which includes several different sources (e.g., current inventory and/or purchases). Therefore, the price provided by SCE in Form 1306 D would be based on a weighted average from these sources. Finally, SCE requests that the CEC clarify whether Form 1306 D is applicable to utility owned generation or strictly to purchases between SCE and third parties.	David Vidaver updated instructions to address SCE's concerns.
12	1306	Electricity Sales and Delivery Information	NewEnergy, Inc	Andy Brown	12/19/2007	Email	(1) the "instruction" tab in the spreadsheet needs to be proofed. It looks like it may have references that should apply to the 1306A form and it does not line up well to the separate PDF "instructions" document;	Staff will address this concern.

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						(2) What is the expected confidentiality treatment for the quarterly submission of information from ESPs? Specifically, the CEC is asking for sales volume break out by geographic areas for each quarter, which can give very detailed market share info that is not otherwise publicly available. Additionally, the CEC is asking for company specific quarterly revenue information that is highly confidential and not disclosed. This data is very sensitive information and we're checking on whether it is required elsewhere, and if so, on what timeframes. While there may be some related information that is released by the EIA 13 months after reporting, my understanding is that data is annual, not quarterly, and it has a significant lag before release. (This was discussed last year.) It would be helpful to have some discussion about uniform confidentiality treatment for this information for the non-UDC LSEs, rather than an ad hoc policy development that tends to otherwise occur based upon individual applications for confidential treatment. CNE understands that the confidentiality regs were rev	Staff will consider.
13 1306	Electricity Sales and Delivery Information	Constellation NewEnergy, Inc	Andy Brown	12/21/2007	Email	Page 44 for CEC 1306B form, under "purpose", typo: should be "Load Serving Entity" not "Local Serving Entities"	Staff will correct document.
14 1306	Electricity Sales and Delivery Information	PG&E	Elaine Rubero	11/2/2008	Email	1306A Schedule 1: Please change Rate Class to Revenue Class, this is the field that PG&E agreed to provide per previous discussions with CEC personnel. Schedule 2: This schedule appears to repeat fields within Schedule 1 with the exception of the field DESCRIPTION. We will incorporate this field within Schedule 1. Schedule 3: This schedule appears to ask us to provide data on our Electric Service Providers, Names, Addresses as well as DA sales amount. I'm not sure what department would not be responsible for providing this data, maybe Energy Services? Also being that ESP names/address information is confidential, proprietary data, I would think this needs to be discussed with Legal department. Please speak to Kathy Trevelan on this schedule and for data source.	Staff contacted PG&E, but was unable to incorporate changes due to comments late submittal
15 1308	Natural Gas Sales and Delivery Information	SoCal Gas & SDG&E	Billie Overturf	12/10/2007	Email	In regards to the online forms, the tab marked "General Instructions" does not print out, nor is it recognized when you go to set the print parameters	Instruction will be added to online form specifying that if users want to print the instructions, they must use the PDF version

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16	1308	Natural Gas Sales and Delivery Information	E & B Natural Resources	Karen Duncan	12/10/2007	Email	I went to the link in your e-mail dated December 7, 2007 and was unable to see anything. Is this the correct link http://www.energy.ca.gov/forms/cec-1308.html ?	Link to 1308 forms was fixed on 12/10/2007
17	1308	Natural Gas Sales and Delivery Information	SPURR	Michael Rochman	12/13/2007	Email	Questions regarding draft form CEC-1308C: 1. Reporting is to include Customer Groups. PG&E does not provide this information to us for each account, but they do provide NAICS codes. Are we obligated to assign certain NAICS-coded accounts to certain Customer Groups? If so, where can we obtain the appropriate cross-reference table from NAICS codes to Customer Groups? Or are we to make our own Customer Group determinations? 2. Reporting is to include Revenue, which is defined in the instructions as "Revenue expressed in dollars, including commodity charges, adjustments, and any other charges billed for gas sold or delivered." Please confirm that Revenue does not include PG&E local distribution charges, which we collect as a convenience to our customers on our bills and remit to PG&E. Please confirm that Revenue does not include taxes.	Andrea Gough contacted SPURR about the concerns with customer groups. No change in instruction is necessary. Definition for revenue has been updated to address SPURR's concern.
18	1309	Natural Gas Pipeline Information	Questar Pipeline Company	Phyllis Hansen	12/10/2007	Email	I would like to discuss this form CEC-1309 with you at your convenience. I can help with this form, but am not familiar with this new requirement	Bill Wood responded to clarify requirements. No change in form or instructions is necessary.
19	1309	Natural Gas Pipeline Information	CEC	Bill Wood	12/10/2007	Email	I have had some confusion with some of the pipelines (mainly Mojave) what is to be reported in each of the Schedules. So I have taken the liberty to suggest a few changes to the forms that hopefully would clear up the misunderstandings. I would guess the instructions should incorporate some of this in the discussion for each form.	Bill Wood modified the form to make it more clear. Instructions will be updated.