



California Public Utilities Commission



Fact Sheet Resource Adequacy Program Citation Database Launches February 2024

In February 2024, California Public Utilities Commission (CPUC) staff published an extensive Resource Adequacy (RA) Program Citation database that makes public previously unavailable information related to RA program citations issued by the CPUC from 2010 through 2023.¹

Additionally, CPUC staff is publishing each of the RA citations, with some confidentiality redactions as needed, in accordance with Decision ([D.](#) [23-06-029](#)). The RA citation database includes data on the type of citation, type of RA deficiency, month of deficiency, deficiency amount, and any penalty points accrued.²

Background on Resource Adequacy

The CPUC adopted an RA policy framework in 2004, in accordance with Public Utilities Code 380, to ensure the reliability of electric service in California. The CPUC established RA obligations applicable to all Load Serving Entities (LSEs) within the CPUC's jurisdiction, including investor-owned utilities (IOUs), energy service providers (ESPs), and community choice aggregators (CCAs). LSEs that fail to procure RA capacity requirements put the electric grid at risk of emergency conditions, including rotating outages or electric grid blackouts.

The Commission's RA policy framework – implemented as the RA program - guides resource procurement and promotes infrastructure investment by requiring that LSEs procure capacity so that capacity is available to the California Independent System Operator (CAISO) when and where needed.

On October 5, 2006, the Commission enacted Resolution E-4017 adopting a Resource Adequacy Requirement (RAR) Citation Program, delegating the authority to issue citations and levy fines for specific violations to Energy Division to enforce all LSEs' compliance with system and local RAR. Resolution E-4017 was superseded and replaced in its entirety by Resolution E-4195 on November 6, 2008. At that time the authority to issue citations and levy fines was transferred to the Consumer Protection and Enforcement Division's (CPED) Utilities Enforcement Branch (UEB).

Background on the CPUC Resource Adequacy Compliance Process

The essence of the CPUC's RA program mandates LSE contracting of capacity to meet system (forecasted load plus a planning reserve requirement), local, and flexible RA requirements. LSEs are required to make both year-ahead (due annually on October 31st) and month-ahead (due 45 days prior to compliance month) compliance filings to the CPUC. Essential steps of the RA compliance process are explained below:

¹ The RA Program Citation Database does not yet reflect all pending RA citations for the 2023 program year. The RA Program started in 2006, but the RA Program Citation database and this fact sheet only extends back to 2010 and not all 2010 citations are reflected.

² In [D.21-06-029](#), the Commission adopted a tiered point system that went into effect in 2022. Penalty points are only applicable to citations from the 2022 RA compliance year and after.



- **Review Filings:** CPUC staff review all compliance filings received in accordance with adopted and published RA program procedures, including verifying the timely arrival of the filings, validating resources claimed against those of the eligible resource list, and comparing filings to generator supply plans submitted to the California Independent System Operator (CAISO).
- **Identify Deficiencies:** Non-compliance occurs in the Resource Adequacy (RA) Program if an LSE files with a procurement deficiency (i.e. insufficient capacity to meet its RA obligations), does not file at all, files late, or does not file in the manner required. Due to the short time frames between compliance filings (submitted 45 days before the month) and the actual month of service, it is critical for filings to be timely and accurate.
- **Refer for Enforcement Action:** Energy Division staff refer instances of non-compliance to CPUC enforcement staff – and enforcement staff determine whether to pursue an enforcement action. As shown in Table 1 below, there are enforcement actions for programmatic deficiencies, and for capacity deficiencies, before and after the cure period.

Additionally, the CPUC and CAISO undertake extensive coordination in the identification of errors or deficiencies. Consistent with their tariff, CAISO may engage in backstop procurement for procurement deficiencies under various circumstances. CPUC enforcement of RA program compliance on CPUC-jurisdictional entities reduces the need for CAISO backstop procurement.³

2023 CPUC Decision to Increase Information about RA Citations and Non-Compliance

There have been 509 RA program violations that have resulted in 144 Consumer Protection Enforcement (CPED) citations between 2010 and 2023.⁴ Historically, the CPUC has made certain information about RA citations and penalties public on the CPUC's RA Program [website](#), including linking to the CPUC's CPED [website](#). The information available from CPED's list of citations includes energy citation number, date of citation issuance, LSE name, citation amount (\$), and a status update on whether the citation was paid and/or appealed. The CPED citations often bundle numerous violations into a single citation.

In June 2023, the Commission observed in D. 23-06-029 that there has been a large increase in RA Program non-compliance due to LSE procurement deficiencies in recent years. Furthermore, the number and type of violations were obscured behind the limited information provided in the citation listings. The CPUC ordered staff to make information public about the magnitude and type of RA deficiencies, so that policymakers and stakeholders can have sufficient information to understand and address RA program violations.⁵ The Commission found that more transparency into LSEs' compliance with the RA program is critical to providing insight into reliability risks related to LSEs' RA deficiencies and RA program violations."⁶

³ More information on CAISO's backstop procurement role is available at the [CAISO RA website](#).

⁴ See footnote 1.

⁵ D.23.06-029 at p.63.

⁶ D.23.06-029 at p.64



Types of Deficiencies and Citations

As shown in Table 1, CPUC LSEs are required to provide information to demonstrate compliance with Resource Adequacy (RA) requirements on a year-ahead and month-ahead basis, including procurement requirements for 1) system, 2) local, and 3) flexible resources. Once Energy Division reviews LSE filings and issues a deficiency notice to an LSE, the LSE has five business days to cure the deficiency.

Table 1. Types of Deficiencies and Scheduled Penalties

Deficiency in either System, Local or Flexible RA Filing (Modifying Appendix A in Resolution E-4195)			
	System RA Penalty	Local RA Penalty	Flexible RA Penalty
Capacity Deficiency Cured within five business days from the date of notification by the Energy Division	\$5,000 per incident if the deficiency is 10MW or smaller, \$10,000 for a deficiency larger than 10 MW. For the second and each subsequent deficiency in any calendar year, penalties will be \$10,000 per incident if the deficiency is 10 MW or smaller, \$20,000 for a deficiency larger than 10 MW		
Capacity Deficiency Not Cured or Replaced after five business days from the date of notification	\$8.88/kW-month (Summer) and \$4.44/kW-month (Non-Summer) ⁷	\$4.25/kW-month	\$3.33/kW-month
Programmatic Deficiency (Late or Incorrect Filing)	\$1,000 per incident plus \$500 per day for the first ten days the filing was late and \$1,000 for each day thereafter.		

Note: This table reflects the current penalty structure in place as of November 2023. The citations listed in the database include citations that were issued under prior penalty structures.

Impact of RA Program Non-Compliance

LSEs that fail to procure RA capacity requirements put the electric grid at risk of emergency conditions, including rotating outages or electric grid blackouts. There is a chance that if even a single LSE fails to procure, the collective electricity grid will be short capacity to serve load. If the California Independent System Operator (CAISO) has insufficient capacity to serve electricity load, it declares various states of emergency, including activating rotating outages to avoid uncontrolled blackouts. The grid operator cannot limit the emergency to a particular set of LSE customers. To avoid such emergencies, the electric grid operator relies on any excess capacity voluntarily supplied by other LSEs, and/or can seek to procure backstop emergency capacity resources under various terms and conditions.

An RA capacity deficient LSE may be cited by the CPUC (usually after some time delay), but it has avoided paying the actual cost of the RA capacity. The RA program penalty is meant to be a deterrent, so even with the application of a penalty, a deficient LSE may be leaning on other LSEs' procurement or relying on various backstop procurement mechanisms, and such mechanisms do not usually have a method to charge specifically an RA-deficient LSE.

⁷ Summer is defined as May – October, and Non-Summer is defined as November-April.



Key Findings and Observations RA Program Citation Database

The Resource Adequacy (RA) Citation Database shows there have been 509 separate instances of RA program violations since 2010, resulting in 144 total RA Citations issued. The Consumer Protection Enforcement Division (CPED) issues a single citation for all violations in a compliance filing (i.e. year-ahead or month-ahead filing), whereas the RA Program Citation Database itemizes each citation. The RA Program Citation Database may contain multiple rows or violations for each assigned citation number.

As reflected in Table 2, since 2010 there have been three citations issued to investor-owned utilities (IOUs) with penalties totaling \$26,000, 86 citations issued to Energy Service Providers (ESPs) totaling over \$9.8 million dollars, and 54 citations issued to Community Choice Aggregators (CCA)s totaling over \$54 million. Since 2010, RA citations have resulted in over \$63 million in fine payments being remitted to the State of California General Fund.

Table 3 reflects RA program citations from 2010 to 2023 by LSE name and type. The number of LSEs is currently 38, but it has varied over time. Of the current 38 LSEs, there are 13 that have received zero citations and are therefore not listed in Table 3. (See Table A2 in the Appendix for a list of all 38 current CPUC-Jurisdictional LSEs.) In Tables 2 and 3, in instances where the Cumulative MW-month deficiency is zero, the deficiency is likely a programmatic rather than a capacity-based deficiency.

Based on the information in Table 3, Electric Service Providers (ESPs) have accrued the highest count of RA citations and number of violations while Community Choice Aggregators (CCAs) have accrued the highest total deficiency measured by MWs per month (those not cured at all or deficiencies cured after five business days) and highest total citation fines (\$).



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Table 2. Citation Amount (\$), Number of Citations, Sum of Capacity Deficiencies, by LSE Type and Year

	Sum of Citation Amount (\$)	Count of Energy Citation Number	Number of Violations	Sum of Citation Deficiency (Not Cured/ or Cured After 5 Business Days) (Cumulative MW-Month)
CCA				
2017	\$ 10,000.00	1	1	0
2018	\$ 2,424,240.00	2	2	364
2019	\$ 8,487,867.00	5	11	1291.5
2020	\$ 2,087,430.50	5	10	311.44
2021	\$ 10,982,536.80	13	19	1269.61
2022	\$ 8,720,474.80	11	17	998.46
2023	\$ 21,322,783.20	18	34	2282.43
CCA Total	\$ 54,035,332.30	55	94	6517.44
ESP				
2010	\$ 6,000.00	2	2	0
2011	\$ 11,160.00	3	3	1
2012	\$ 16,500.00	3	3	0
2013	\$ 10,000.00	2	4	0
2014	\$ 5,000.00	1	1	0
2015	\$ 31,000.00	5	5	0
2016	\$ 18,000.00	4	4	0
2017	\$ 125,609.60	3	3	18.56
2018	\$ 172,529.00	8	19	26.15
2019	\$ 1,094,449.80	20	97	208.1
2020	\$ 1,201,175.40	18	70	246.68
2021	\$ 1,463,020.70	7	112	265.65
2022	\$ 2,664,535.60	7	67	345.81
2023	\$ 3,065,678.80	7	22	350.07
ESP Total	\$ 9,884,658.90	86	412	1462.02
IOU				
2012	\$ 5,000.00	1	1	0
2016	\$ 10,000.00	1	1	0
2022	\$ 11,000.00	1	1	0
IOU Total	\$ 26,000.00	3	3	0
Grand Total	\$ 63,945,991.20	144	509	7979.46

*See footnote 1



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Table 3. Citations by LSE and Type, 2010-2023

	Sum of Citation Amount (\$)	Count of Energy Citation Number	Number of Violations	Sum of Citation Deficiency (Not Cured/ or Cured After 5 Business Days) (Cumulative MW-Month)
CCA				
Central Coast Community Energy	\$ 15,235,246.20	10	13	1642.98
Clean Energy Alliance	\$ 616,627.20	2	2	69.44
Clean Power Alliance of Southern California	\$ 10,000.00	1	4	0
CleanPowerSF	\$ 3,526,568.00	6	8	392.35
Desert Community Energy	\$ 650,104.80	3	5	73.21
East Bay Community Energy	\$ 6,370,452.10	8	14	794.88
Orange County Power Authority	\$ 2,545,659.60	3	6	312.67
Peninsula Clean Energy Authority	\$ 2,960,407.20	2	4	331.69
Pioneer Community Energy	\$ 2,561,702.40	3	3	384.64
Redwood Coast Energy Authority	\$ 263,114.40	2	2	29.63
San Diego Community Power	\$ 5,052,845.60	4	8	549.87
San Jose Clean Energy	\$ 8,675,568.00	4	9	1290.22
Silicon Valley Clean Energy Authority	\$ 3,588,498.40	3	7	386.43
Sonoma Clean Power Authority	\$ 442,012.00	1	3	48.65
Valley Clean Energy Alliance	\$ 6,660.00	2	2	2
Western Community Energy	\$ 1,529,866.40	1	4	208.78
CCA Total	\$ 54,035,332.30	55	94	6517.44
ESP				
3 Phases Renewables, LLC	\$ 32,500.00	4	4	0
Agera Energy	\$ 58,481.80	3	7	8.23
American PowerNet Management, LP	\$ 66,410.20	2	10	8.47
Commerce Energy, Inc.	\$ 11,000.00	3	3	0
Commercial Energy of California	\$ 1,972,455.50	20	198	434.73
Commercial Energy of Montana, Inc	\$ 41,824.80	2	2	6.28



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Constellation New Energy, Inc.	\$	2,733,408.00	2	2	304.1
Direct Energy Business, LLC	\$	2,355,319.00	5	5	268.36
EDF Industrial Power Services, LLC	\$	149,463.60	6	17	22.35
Glacial Energy of California	\$	10,000.00	2	2	0
Glacial Power	\$	6,660.00	1	1	1
Just Energy Solutions, Inc.	\$	777,856.40	17	85	143.2
Liberty Power Holdings	\$	14,000.00	3	5	0
Pilot Power Group, Inc.	\$	753,866.30	5	19	100.12
Shell Energy North America (SENA)	\$	584,132.50	3	40	131.09
The Regents of the University of California	\$	307,780.80	4	8	34.09
Tiger Natural Gas	\$	9,500.00	4	4	0
ESP Total	\$	9,884,658.90	86	412	1462.02
IOU					
San Diego Gas & Electric	\$	16,000.00	2	2	0
Southern California Edison Company	\$	10,000.00	1	1	0
IOU Total	\$	26,000.00	3	3	0
Grand Total	\$	63,945,991.20	144	509	7979.46



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Table 4 below reveals the citations by type, and it shows that year-ahead (YA) system deficiencies account for the highest sum of citation fines (\$) and total deficiency (MW-months) that either remain uncured or cured after five business days. Month-Ahead (MA) system deficiencies have the highest count of Resource Adequacy (RA) citations and the second highest total deficiency that remain uncured or after five business days and total citation fines.

Table 4. Citations by Type, by Amount of Citation, and Number of Citations, 2010-2023

	Sum of Citation Amount (\$)	Count of Energy Citation Number	Number of Violations	Sum of Citation Deficiency (Not Cured/ or Cured After 5 Business Days) (Cumulative MW-Month)
Programmatic				
Programmatic	\$ 71,500.00	7	7	0
Programmatic Total	\$ 71,500.00	7	7	0
MA				
Flexible	\$ 45,541.10	11	11	7.67
Local	\$ 8,330.00	3	3	1.96
Programmatic	\$ 53,160.00	15	15	1
System	\$ 19,492,146.20	71	74	2221.31
MA Total	\$ 19,599,177.30	93	103	2231.94
YA				
Flexible	\$ 688,122.90	12	43	207.13
Local	\$ 2,094,161.40	7	272	509.51
Programmatic	\$ 272,000.00	2	2	0
System	\$ 41,221,029.60	34	82	5030.88
YA Total	\$ 44,275,313.90	44	399	5747.52
Grand Total	\$ 63,945,991.20	144	509	7979.46



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Table 5 below displays the citation points accrued by LSEs.⁸ All LSEs as of October 2023 with citation points are in Tier 1.⁹ Starting in 2022, the CPUC has assessed citation points as an additional deterrent for LSEs to be RA deficient.

Table 5. Citation Points Accrued LSEs by Date and Citation Amount (\$), Citation Point Expiration, and Citation Point Tier Level

Energy Citation Number	Date Issued	Load Serving Entity	Year	Deficiency Month	Citation Amount	Citation Points	Citation Points Expiration Date (Month-Year)	Citation Point Tier Level
E-4195-0127	9/21/2022	Central Coast Community Energy	2022	September	\$506,098.40	2	Sep-24	Tier 2
E-4195-0146	8/14/2023		2023	July	\$159,129.60	2	Aug-25	
E-4195-0151	11/8/2023		2023	August	\$1,455,609.60	2	Aug-25	
E-4195-0154	11/16/2023	Clean Energy Alliance	2023	August	\$226,262.40	2	Aug-25	Tier 1
E-4195-0155	12/8/2023		2023	September	\$390,364.80	2	Sep-25	
E-4195-0128	9/22/2022	CleanPowerSF	2022	September	\$1,456,320.00	2	Sep-24	Tier 1
E-4195-0147	8/30/2023		2023	August	\$745,387.20	2	Aug-25	
E-4195-0156	12/20/2023	Desert Community Energy	2023	August	\$151,048.80	2	Aug-25	Tier 1
E-4195-0157	1/3/2024		2023	September	\$124,408.80	2	Sep-25	
E-4195-0123	9/8/2022	Direct Energy Business, LLC	2022	August	\$499,144.80	2	Aug-24	Tier 1
E-4195-0124	9/13/2022		2022	September	\$1,733,020.80	2	Sep-24	
E-4195-0129	9/30/2022	East Bay Community Energy	2022	September	\$878,587.20	2	Sep-24	Tier 1
E-4195-0125	9/16/2022	Orange County Power Authority	2022	September	\$415,406.40	2	Sep-24	Tier 1
E-4195-0148	9/15/2023	Redwood Coast Energy Authority	2023	August	\$139,149.60	2	Aug-25	Tier 1
E-4195-0150	10/27/2023		2023	September	\$123,964.80	2	Sep-25	
E-4195-0145	8/13/2023	The Regents of the University of California	2023	July	-	2	Jul-25	Tier 2
E-4195-0149	9/20/2023		2023	August	\$34,898.40	2	Aug-25	
E-4195-0153	11/13/2023		2023	September	\$69,796.80	2	Sep-25	

⁸ See footnote 1.

⁹ For more information on RA penalty points, please consult the Penalties Read Me tab of the RA Citation Database or the RA Program website.



Figure 1 below demonstrates that the Resource Adequacy (RA) program experienced a significant uptick in RA non-compliance from 2017 to 2023. Figure 1 reflects the magnitude of deficiencies in MW-months across the compliance period that were either not cured by the LSEs (or cured after five business days). The current 2023 compliance year has seen the largest number of uncured deficiencies recorded since 2010, currently totaling ~2,620 MW-month (these amounts do not yet include the remainder of September through December Month-Ahead citation referrals).

The data for Figure 2 begins in 2017 due to the increase in magnitude of MWs per month deficiencies based on Figure 1. Figure 2 shows the amount of deficiencies identified during the RA filing process that are ultimately cured by LSEs. The figure compares the annual amount of MW-months deficiencies¹⁰ from 2017 to 2023, that were originally identified (in blue) and the amount of deficiencies that remained after the LSEs were given the opportunity to cure over 5 business days (in orange).

As shown, the majority of MWs per month that the CPUC initially cited in correction notices were either cured or remained uncured after the cure period of five business days. System deficiencies constitute the majority of the MWs per month left uncured. Any deficiencies (MWs per month) uncured after the cure period are subject to a higher penalty price as reflected in Table 1 above. The difference between the initial deficiency amount (MWs per month) and any uncured deficiencies (MWs per month) after the cure period are cured deficiencies (MWs per month) subject to a lower penalty price also reflected in Table 1. Figure 3 below reflects aggregated citations issued from 2017 to 2023 by LSE.¹¹

Additional Information

For more information about the California Public Utilities Commission's (CPUC) Resource Adequacy (RA) Program, see www.cpuc.ca.gov/ra, and for the RA Enforcement and Citations page see <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/resource-adequacy-homepage/resource-adequacy-penalties-and-citations>

For questions regarding the RA Citation Database, please email rafilings@cpuc.ca.gov.

For more information on the CPUC's Utility Enforcement Branch, Energy Related Citation programs, see: <https://www.cpuc.ca.gov/regulatory-services/enforcement-and-citations/utility-enforcement-branch/energy-citation-programs>

¹⁰ Includes both month-ahead and year-ahead citations from 2017 to 2023 for system, flexible, and local deficiencies. 1,360.81 MWs of deficiencies in the initial correction notice and 740.70 MWs of deficiencies cured after five business days or not at all are reflected for flexible overlap with system deficiencies as these are bundled products.

¹¹ For a list of Load Serving Entity names and LSE CPUC IDs, please consult Table A1 in the Appendix.



Figure 1: Citations for the RA Program Issued from 2012 to 2023 by Sum of MWs for Deficiencies Not Cured at all or Cured after 5 Business Days (MWs per Month)

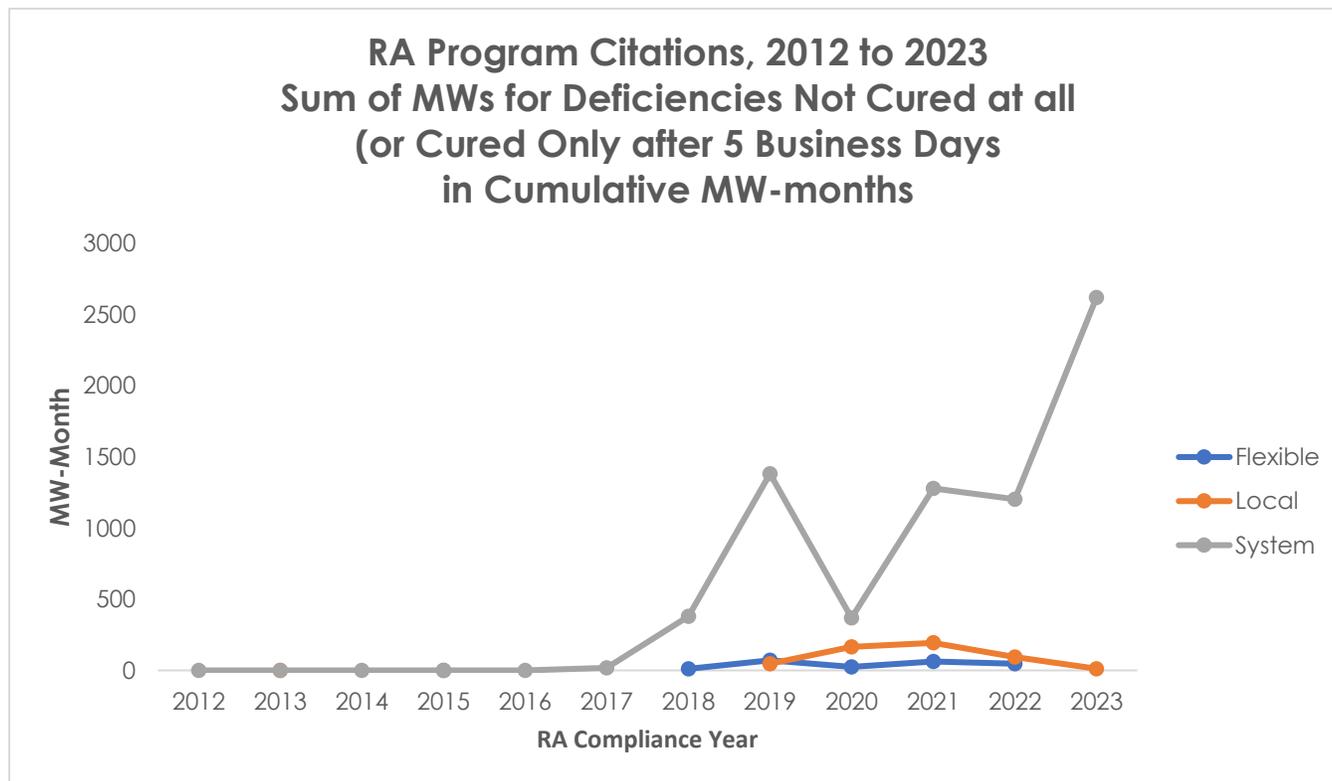




Figure 2: Comparison Between Amount Deficient (MWs per Month) in Initial Correction Notice and Citation Deficiency Cured After 5 Business Days or Not at All

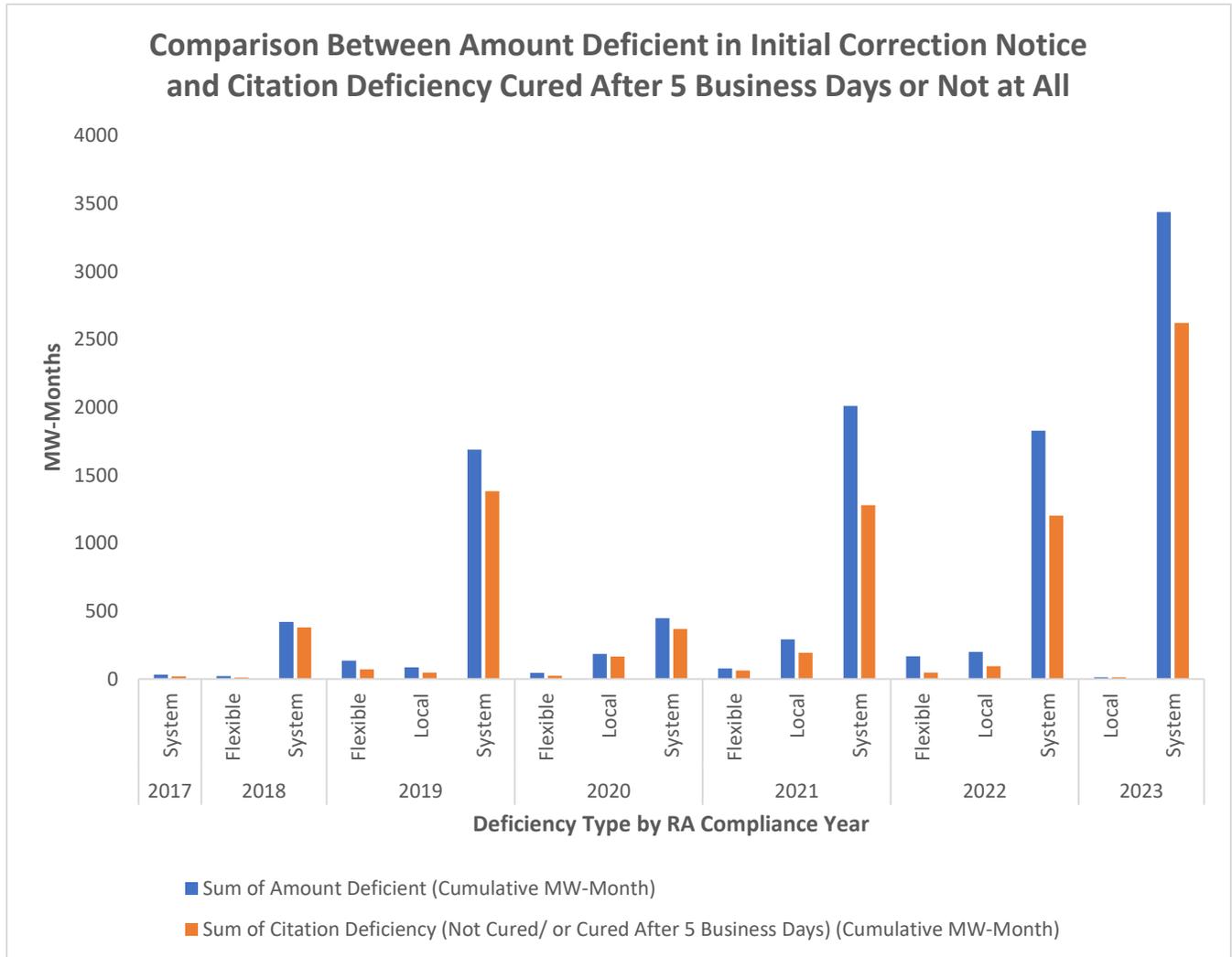
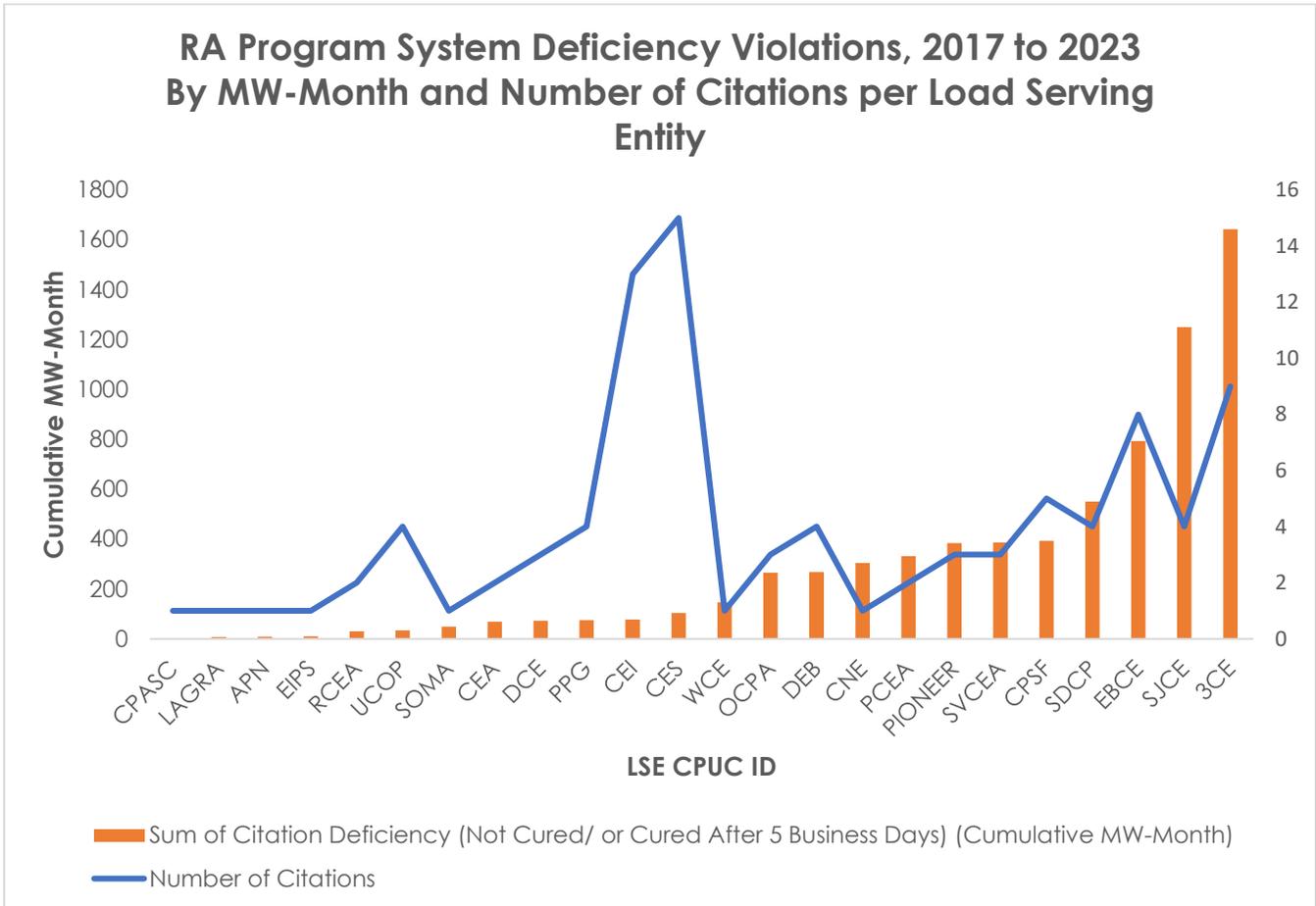




Figure 3: Citations for the Resource Adequacy (RA) Program Issued from 2017 to 2023 for System Deficiencies by LSE CPUC ID, Number of Citations, and Sum of Deficiencies Not Cured or Cured After 5 Business Days (MWs per Month)





Appendix

Table A1: List of Load Serving Entities (LSEs) and Their Assigned CPUC IDs as Reflected in the Resource Adequacy Citation Database

Load Serving Entity (LSE)	LSE CPUC ID	Count of Energy Citation Number
3 Phases Renewables, LLC	3PR	4
Agera Energy	LAGRA	3
American PowerNet Management, LP	APN	2
Central Coast Community Energy	3CE/MBCPA	10
Clean Power Alliance of Southern California	CPASC	1
CleanPowerSF	CPSF	6
Commerce Energy, Inc.	CE	3
Commercial Energy of California/Commercial Energy of Montana, Inc	CES	22
Constellation New Energy, Inc.	CNE	2
Desert Community Energy	DCE	3
Direct Energy Business, LLC	DEB	5
East Bay Community Energy (Ava)	EBCE	8
EDF Industrial Power Services, LLC	EIPS	6
Glacial Energy of California	GEC	2
Glacial Power	GP	1
Just Energy Solutions, Inc.	CEI	17
Liberty Power Holdings	LPH	3
Orange County Power Authority	OCPA	3
Peninsula Clean Energy Authority	PCEA	2
Pilot Power Group, Inc.	PPG	5
Pioneer Community Energy	PIONEER	3
Redwood Coast Energy Authority	RCEA	2
San Diego Community Power	SDCP	4
San Diego Gas & Electric Company	SDGE	2
San José Clean Energy	SJCE	4
Shell Energy North America (SENA)	SENA	3
Silicon Valley Clean Energy Authority	SVCEA	3
Sonoma Clean Power Authority	SOMA	1
Southern California Edison Company	SCE	1
The Regents of the University of California	UCOP	4
Tiger Natural Gas	TNG	4
Valley Clean Energy Alliance	VCEA	2
Western Community Energy	WCE	1



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Table A2: List of Current CPUC-Jurisdictional Load Serving Entities (LSEs) and Their Assigned CPUC IDs

LSE Name	LSE CPUC ID	Count of Energy Citation Number
Pacific Gas and Electric Company	PGE	0
San Diego Gas and Electric Company	SDGE	2
Southern California Edison	SCE	1
3 Phases Renewables	3PR	4
Apple Valley Choice Energy	AVCE	0
Clean Energy Alliance	CEA	2
Commercial Energy of Montana	CES	22*
Constellation NewEnergy, Inc.	CNE	2
Calpine Power America-CA, LLC	CPA	0
Clean Power Alliance of Southern California	CPASC	1
CleanPowerSF	CPSF	6
Desert Community Energy	DCE	3
Direct Energy Business, LLC	DEB	5
East Bay Community Energy (Ava)	EBCE	8
EDF Industrial Power Services (CA), LLC	EIPS	6
King City Community Power	KCCP	0
Lancaster Choice Energy	LCE	0
Central Coast Community Energy	3CE/MBCPA	10
Marin Clean Energy	MCE	0
Calpine Energy Solutions, LLC	NES	0
Orange County Power Authority	OCPA	3
City of Palmdale	PALMDALE	0
Peninsula Clean Energy Authority	PCEA	2
Pioneer Community Energy	PIONEER	3
Pomona Choice Energy	POMONA	0
Pilot Power Group, Inc.	PPG	5
Pico Rivera Innovative Municipal Energy	PRIME	0
Redwood Coast Energy Authority	RCEA	2
Rancho Mirage Energy Authority	RMEA	0
Santa Barbara Clean Energy	SBCE	0
San Diego Community Power	SDCP	4
Shell Energy North America	SENA	3
San José Clean Energy	SJCE	4
San Jacinto Power	SJP	0
Sonoma Clean Power Authority	SOMA	1
Silicon Valley Clean Energy Authority	SVCEA	3
The Regents of the University of California	UCOP	4
Valley Clean Energy Alliance	VCEA	2

*Includes both Commercial Energy of California and Commercial Energy of Montana, Inc.