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March 15, 2024

Advice No. 6276-G  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Integrated Demand-Side Management (IDSM) Pilot Program Proposal**

Southern California Gas Company (SoCalGas) hereby respectfully requests California Public Utilities Commission (Commission) approval of SoCalGas' Integrated Demand-Side Management (IDSM) Pilot Program referred to as the SoCalGas Clean Energy Integration Program (CEIP).

**Purpose**

SoCalGas submits this advice letter filing in compliance with Decision (D.) 23-06-055, which allows for the program administrators (PAs) to submit an advice letter proposal for an IDSM pilot framework.

The purpose of this advice letter is to propose a program that will support the Commission's clean energy goals. California's electric grid and gas systems are intertwined in a complex manner, and they have become increasingly cleaner with a continued focus on reliability, resiliency, and affordability. SoCalGas is the nation's leading provider of natural gas energy efficiency (EE) programs and supports the use of renewable natural gas and renewable hydrogen. The CEIP pilot described in this advice letter will identify a framework and technologies that will demonstrate how the gas system will complement and enhance the reliability, resiliency, and affordability of the electric grid and serve customers' energy needs in an integrated fashion.

**Background**

The Commission has a long-standing policy to encourage PAs to incorporate other demand-side management measures besides EE in their portfolios in an integrated fashion.<sup>1</sup> Most recently, in D.23-06-055, the Commission continues to support IDSM by allowing a PA to expend up to \$15 million within the 2024-2027 program cycle, on a pilot basis for ongoing

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<sup>1</sup> D.23-06-055, p. 77

load shifting that reduces peak consumption.<sup>2</sup> The IDSM framework and pilot program are required to be submitted via Tier 3 advice letter no later than March 15, 2024.<sup>3</sup>

To support the advice letter filing, the Commission directed the Energy Division to provide guidance for what is to be included and how it should be presented in the advice letter by January 1, 2024.<sup>4</sup> On December 28, 2023, the Energy Division issued the required guidance for the advice letter filing.<sup>5</sup>

In compliance with D.23-06-055, SoCalGas's IDSM Pilot Program Proposal filing includes the following:

- A. Framework and Structure of the CEIP Pilot
- B. Measurement Approach
- C. Non-Energy Efficiency Funding
- D. Balancing Account Treatment

## **Discussion**

SoCalGas is a nationally recognized leader in partnering with customers to implement demand-side management solutions. Last year, the Environmental Protection Agency, along with the Department of Energy recognized SoCalGas as an ENERGY STAR Partner of the Year for its outstanding and successful implementation of EE programs. SoCalGas will leverage its expertise in implementing comprehensive, successful customer programs into the CEIP framework outlined below.

### **A. Framework and Structure of the CEIP Pilot**

The SoCalGas CEIP aims to deliver clean, reliable, and affordable energy solutions to support California's clean energy future. The outcomes SoCalGas intends to achieve are an increase in customer awareness and participation in all available demand-side management resources through the infusion of rebates and incentives provided by applicable EE funded resources. This is accomplished by integrating the EE funded programs with the non-EE funded programs administered by SoCalGas. As a result of this integration, SoCalGas expects to increase customer participation in all programs. This guides the framework by addressing objectives and key activities to support these clean energy results and to accomplish permanent load reduction. Ultimately, SoCalGas proffers that CEIP will help California achieve its Clean Energy Goals: to have a cleaner, more affordable, and more resilient and reliable grid.

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<sup>2</sup> *Id.* at p. 78

<sup>3</sup> *Id.* at p. 79

<sup>4</sup> *Id.* at p. 80

<sup>5</sup> Energy Division Guidance on Integrated Demand-Side Management (IDSM) Tier 3 Advice Letter Submissions from the Energy Efficiency Portfolio Administrators (PAs), December 28, 2023

**Table 1 – CEIP Guiding Framework**

Results	Objectives	Key Activities and Performance Indicators
Cleaner [1], [2]	<ol style="list-style-type: none"> <li>1. Reduce GHG emissions from Electric Sector.</li> <li>2. Achieve or exceed SoCalGas's Total System Benefit goals.</li> </ol>	<ul style="list-style-type: none"> <li>• Identify and report annual reduced GHG emissions.</li> <li>• Record and report EE measures and other implemented technologies.</li> <li>• Record and report customer and PA financial contributions.</li> <li>• Log projects and measure flows to respective EE programs.</li> </ul>
Reliable [3]	<ol style="list-style-type: none"> <li>1. Improve electric grid reliability.</li> <li>2. Leverage financial opportunities beyond the traditional isolating behavior of EE and non-EE programs.</li> </ol>	<ul style="list-style-type: none"> <li>• Measure permanent load reduction (Report kW reduction &amp; annual kWh savings accomplished).</li> <li>• Record and report TSB (Total System Benefit).</li> <li>• Log and report participating project and which programs they flowed to.</li> </ul>
Affordable	<ol style="list-style-type: none"> <li>1. Address issues that affect electric affordability.</li> </ol>	<ul style="list-style-type: none"> <li>• Record and report TSB (Total System Benefit).</li> <li>• Track project capital costs and fuel-cost projection.</li> </ul>
<p>[1] D.24-02-047 OP. 10 Reduce GHG emission by 25MMT by 2035.</p> <p>[2] SoCalGas's Advice No. 6200-G Table 2 – Annual and Cumulative Total System Benefit Forecast.</p> <p>[3] D.24-02-047 Table 4 on page 68 which indicates a goal that aims to integrate more than 56 GW of new generation and storage by 2035.</p>		

Supporting these objectives, SoCalGas intends to leverage all energy-efficiency funded program resources available, as well as all non-EE funded programs available. The only current relevant SoCalGas non-energy-efficiency funded program available is its Self-Generation Incentive Program (SGIP). However, SoCalGas is aware of other programs, outside of EE, which provide education, information, and services for customers that would fit into the integrated DSM category if they offered incentives. SoCalGas has also requested funding for, and is awaiting approval on, customer program offerings, such as those supporting carbon capture and clean energy vehicle technologies. Though these proposed programs have yet to be authorized, when they are, SoCalGas intends to incorporate them into CEIP, as applicable.

Consistent with the Energy Division guidance document,<sup>6</sup> because SoCalGas is continuing efforts on the development of future programs, approval is requested of the CEIP framework, and details of any specific future programs will be provided in subsequent Tier 2 advice letters.

SoCalGas has already identified technologies to incorporate into CEIP, of which sample versions are provided in Table 2 – CEIP Identified Technologies. Table 2 identifies how each of these technologies fit within the framework to accomplish their respective clean energy target results, qualify as DSM programs, and access anticipated funding sources. SoCalGas fully expects to continue to identify EE-funded and non-EE-funded resources, such as other programs, technologies, customer markets, applicable Distributed Energy Resources (DERs), and funding sources as they become available and could be incorporated into this framework. Details of how specific technologies will be prioritized according to their outcomes, as well as budget allocation, will be provided in the subsequent Tier 2 AL.

<sup>6</sup> Energy Division Guidance on Integrated Demand-Side Management (IDSM) Tier 3 Advice Letter Submissions from the Energy Efficiency Portfolio Administrators (PAs), dated December 28, 2023. The guidance explains “For those PAs who are ready, they can include the details of the new programs they are ready to propose in their March 15 advice letters. PAs who have not completed the development of the future programs in time should provide the framework and structure that they will use for the new programs by March 15 and then provide the details of the specific new programs in future tier 2 advice letters.”

**Table 2 - CEIP Identified Technologies**

Technology	Technology Description	Cleaner	More Reliable	More Affordable	Applicable DER	Customer Market	Funding Sources
Hybrid Heating	Installation of electric heat pumps with gas backup systems with intelligent controls to identify when outdoor air temperatures are so low that the heating system will switch from the electric-heat pump mode to using a more efficient backup gas-furnace.	x	x	x	Energy Efficiency Upgrades	Residential	Energy Efficiency / CEF / Fed Tax Credits
Clean Generation with DERs (CHP, Building Energy Management Systems (BEMS), and Storage)	Leverage combined heat and power opportunities using clean generation technologies (e.g., fuel cells and linear generators) to provide heat, (ex. boiler feedwater, pool heating, food processing fluid streams). Enhancement opportunity utilizing BEMS with AI features and storage.	x	x	x	Energy Efficiency / SGIP	Commercial / Hospitals / District Energy / Schools and Universities	Energy Efficiency / SGIP
Energy Storage along with energy efficient heat or cooling equipment addition	Energy storage leverages its ability to introduce energy into a system at a time when it is most needed. There are two methods commonly used: batteries, and thermal. Batteries store electricity, while thermal stores either hot or cold energy and is used to enable the user to remove equipment impacting the utility grid.	x	x	x	Energy Efficiency / SGIP	Commercial / Hospitals / District Energy / Schools and Universities	Energy Efficiency / SGIP
<p><b>Sheet Notes:</b></p> <p>[1] The above-listed potential ideas and technologies are examples that can be implemented.</p> <p>[2] The intent of this Advice Letter filing is to present the framework and structure that will allow for incorporation of additional technologies as they are identified.</p> <p>[3] Non-Energy Efficiency funding sources are limited internally to the SGIP program. However, SoCalGas is looking to leverage other external funding sources such as tax credits available.</p> <p>[4] Clean generation technologies may include, but is not limited to, fuel cells, linear generators, and microturbines.</p> <p>[5] All technologies intend to leverage the guidance indicated in the recently filed (2/22/24) "2024 Joint Agency Staff Paper: Progress Towards a Gas Transition - A White Paper Supporting the CPUC's Long-Term Gas Planning Rulemaking R.20-01-007."</p> <p>[6] Clean Energy Financing (CEF) is a new on-bill-financing inspired EE program defined in Decision D.23-08-026 - Decision on Clean Energy Financing Proposals.</p>							

The identified technologies demonstrate how the CEIP will add value to non-EE funded resources delivering on the Commission's efforts to accomplish permanent load shifting, while meeting California's clean energy target for clean, reliable, and affordable energy.

### **Hybrid Heating**

This measure technology category utilizes gas heating technologies to take over the heating demand during peak heating conditions when electric heat pump technologies performance is at its at its least efficient and poorest performing. This negative impact to the grid is even further exasperated when the heating system uses electric-resistance auxiliary heating during cold weather. The implementation of this measure increases grid reliability by reducing the demand on alternative generation sources (which are underperforming during such cold weather events) and the increased draw of electricity by the heat pump. The grid is cleaner by implementing this solution by reducing the need for non-alternative-energy generation. Using gas heating during these cold events is also more affordable by avoiding the use of electricity at a time when the heat pump is poorly performing.

### **Clean Generation with DERs**

This measure technology category is a traditional opportunity to pair clean generation with distributed energy resources to increase efficiencies and reduce peak load. With combined heat and power, customers can leverage heat recovery from available heat due to generation heat loss inefficiencies but using clean generation technologies available to us today such as fuel cells and linear generators. By capturing this available heat and utilizing it by delivering it to heat loads present on site, such as pools, domestic hot water, industrial hot water, and milk pasteurization processes, SoCalGas will be able to meet all three targets. By leveraging heat recovery, these measures can help make a cleaner environment by offsetting the primary heating system, whether the source is electric or gas, as well as take advantage of local distribution system efficiency improvements compared to the traditional long distant transportation and distribution system. This solution also increases affordability by taking advantage of free heat energy available from the microgrid generation source. Additional EE improvements with clean generation can include AI integration with a Building's Energy Management System and battery or thermal energy storage can further enhance load shifting opportunities. This increases grid reliability by adding generation into the clean energy microgrid system.

### **Energy Storage**

This measure technology category is also a traditional opportunity leveraging its load shifting capability. By helping the customer identify and install energy efficient equipment, the customer will not only help shift the load, but also reduce the load and demand to the grid making the grid more reliable. By storing energy, whether in the form of electrons via batteries, thermal energy via tanks, or chemicals via tanks, this measure excels at accessing energy at times that can benefit the customer. Energy storage is able to reduce grid impacts making the grid more dependable and avoid the need to bring non-alternative energy generation sources making the grid cleaner. And because the customer is storing energy for later use, they can manage their bills making it more affordable too.

The coordination approach for interfacing with other DER programs is for SoCalGas to establish a CEIP Customer Project Integration (CPI) team managed within the EE funded resource programs. As customers are identified, engaged, and solicited, and when they decide to participate, the CPI team will engage with the appropriate EE and non-EE programs available for the customer to receive an incentive. Each of these programs will process their applications as has traditionally been the case, ensuring that they comply with all prior rulings and policy. There are currently no anticipated exemptions or deviations from established policy.

The applicable Rulemakings are:

- Self-Generation Incentive Program (SGIP): R.12-11-005 - Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues.
- Energy Efficiency: R.13-11-005 Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Programs, Evaluation, and Related Issues (November 21, 2013).

SoCalGas will establish a team that will guide market analysis, customer identification, customer solicitation, customer recruitment, customer project processing to redirect the project to the appropriate energy-efficiency and non-energy-efficiency funded resource programs and track the project's implementation and completion. By actively identifying and monitoring the given customer project, as well as logging and tracking its activity and progress, SoCalGas will be able to identify its effectiveness. Post analysis will be used to identify project success or lack thereof, helping to identify incentive structure or other market barriers that may be available to qualify it for increased funding for future portfolios.

SoCalGas plans to use its EE funds from the Market Support portfolio category<sup>7</sup> and the SGIP to advance technology improvements. As future programs are developed, other funding sources will be detailed in their respective Tier 2 advice letters.

For the CEIP Pilot, EE and SGIP will equally split the cost of non-incentive program activities such as marketing, education, and outreach. Program incentives will be funded by SGIP and EE from their individual budgets. These incentives will be stacked by SoCalGas to reduce the customer's cost, which is typically a major barrier to adopting the EE/DER solution. D.23-06-055 also clarifies that energy efficiency funding cannot be used for rebates on capital costs of non-efficiency technologies but can serve as an operational complement to potential capital funding from other sources<sup>8</sup>.

SoCalGas will allocate funds to the proposed EE/DER program in accordance with the funding rules of each proceeding. To maintain transparency, the company will report on the EE/DER program activities, including the sharing of program costs and stacked incentives, through its existing EE reporting procedures.

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<sup>7</sup> Decision 21-05-031, p. 14.

<sup>8</sup> D.23-06-055, p. 80.

## **B. Measurement Approach**

Because SoCalGas intends to use all rebates and incentives available within the given IDSM project, the following paths outline the process to determine the appropriate *ex ante* assumptions to be used. Unless instructed otherwise, SoCalGas will default, as a new market transformation program, to applying a Net-To-Gross (NTG) ratio of 1.0. This is applicable because CEIP is a pilot program whose conceptualized objective is to influence customer participation due to the combined infusion of EE and non-EE funded resource incentives. Therefore, the NTG) ratio Ex-Ante assumption should be 1.0 for all submitted projects participating within it. This exemption request supersedes any inferred NTG assumption within any of the processes outlined below:

- Deemed measure path: The appropriate workpaper assumptions from the CPUC approved Measure Packages housed within the Electronic Technical Reference Manual (eTRM) will be chosen for the stipulated measures and their respective Ex-Ante assumption values.
- Custom measure path: Project measures shall follow the latest Statewide Custom Project Guidance Document requirements. If the Normalized Metered Energy Consumption (NMEC) method is chosen, the “Rulebook for Programs and Projects Based on Normalized Metered Energy Consumption” version 2.0 (release date January 7, 2020, and herein referred to as “NMEC Rulebook”) or any superseding version shall be used. If the chosen measurement methodology utilizes the “International Performance Measurement and Verification Protocol” (IPMVP) Option C (one-year full baseline measurement), the Effective Useful Life (EUL) Ex-Ante assumption shall be based on the specific project type.

NMEC Programs will utilize the applicable measurement protocol as presented within the NMEC Rulebook, Section III, Subsection 1, Part 3, Subpart A including their associated citations or provisions. Generally stated within Subpart A paragraph 1, “All NMEC projects and programs are subject to Commission review of savings measurement methods and estimates, for purposes of program and/or project-level feedback and for purposes of ex-post impact evaluation.”<sup>9</sup>

In compliance with the CPUC's instructions to conform to the existing guidelines within the ongoing EE and DER proceedings, SoCalGas will adopt the project cost methodologies outlined in the SGIP Handbook for the SGIP project, and the Statewide Custom Project Guidance Document for the EE project.

Additionally, NMEC measurement efforts shall not exceed 5% of the project cost.

Reporting of program costs and accomplishments shall follow SoCalGas' Annual Report and True-Up Annual Report processes that are established for both the EE and non-EE funded resource portfolio and programs, respectively. Each resource will continue to report parameters in accordance with their respective regulatory requirements.

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<sup>9</sup> Assigned Commissioner and Administrative Law Judge's Ruling Regarding High Opportunity Energy Efficiency Programs or Projects (12/30/2015) Attachment A, at 7-8

SoCalGas's non-EE resource is currently limited to the SGIP program, as initiated by the Commission in D.01-03-073.<sup>10</sup> SoCalGas concurs with the applicable rules, procedures, and requirements of the decision.

### **C. Non-Energy Efficiency Funding**

The integration of the EE and non-EE program operations will be managed using a single source clearinghouse that will be led from within the EE program operations. SoCalGas is calling this team, or role, the Customer Clean Energy Integrator. This SoCalGas team will identify opportunities that will combine the technologies present in the non-EE-funded and EE-funded sourced programs. This team will then identify and solicit candidate customers and process them according to the technologies and measure incentive program that best suits the project at hand.

The EE funded programs will include the full portfolio of program offerings available to SoCalGas customers, including local SoCalGas managed EE Programs, Statewide Programs, as well as those managed by Third-Party EE Contractors and Regional Energy Networks (RENs). The current internal non-EE funded program available is SoCalGas' SGIP program, which offers a choice of generation or, storage for participation.

Within SGIP, applications are subject to the incentive rates of the PA to which they apply.<sup>11</sup> Applications are assigned an incentive and reviewed in the order they are received. A lottery is conducted if application submissions for a given budget and step on a single day exceed the available funding in each PA's territory.

To qualify for SGIP, each budget category (Large-Scale Storage, Small Residential Storage, Residential Storage Equity, Non-Residential Storage Equity, Equity Resiliency, SJV Residential, SJV Non-Residential, and Generation) has specific incentive qualifications depending on the project. Once project systems are installed, interconnected and operational, the host customer submits an incentive claim form to the PA. The PA may schedule an on-site or virtual post-installation inspection of the project. Upon final approval of the Incentive Claim documentation and payment process begins. CEIP projects leveraging SGIP funding will be subject to funding limitations and guidelines of SGIP.

SoCalGas will also continue its pursuit of federal, state, and local grants to identify non-ratepayer funding sources that can help promote and advance the CEIP pilot. For example, SoCalGas is currently in the review process for a grant submittal to the United States Bureau of Reclamation for installation of water conservation devices in Los Angeles.

At present and aside from SGIP requirements, SoCalGas is not aware of limits on the amount of non-energy efficiency funding sources. As non-energy efficiency opportunities are identified and included within this framework, potential limits will be researched and addressed through the pilot offerings. SoCalGas will also preserve all necessary funding to continue to meet EE caps, such as the requirement to fund 60% of its portfolio budget through third-party implemented programs. Additionally, if applicable money will be reserved as an incentive for project operational costs to complement capital costs incentives provided

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<sup>10</sup> As a result of AB 970, SGIP was initiated in D.01-03-073.

<sup>11</sup> Self-Generation Incentive Program Handbook. [https://www.selfgenca.com/home/program\\_metrics/](https://www.selfgenca.com/home/program_metrics/).



through the non-EE-funded resource program. Once approved, SoCalGas will establish the accounting framework to track and report costs of CEIP along with its other EE program activities. SoCalGas will continue to monitor and report on its third-party and total portfolio EE expenditures through current EE program reporting activities to support compliance with the attendant financial requirements.

#### **D. Balancing Account Treatment**

SoCalGas plans to use EE funds for these projects and will record costs incurred for the program in the Demand Side Management Balancing Account (DSMBA). Additionally, any SGIP funds leveraged will be recorded to the Self-Generation Program Memorandum Account (SGPMA). SoCalGas will utilize its current accounting mechanisms to track costs to be able to identify any SGIP, or other potential non-EE program funds, which will support the CEIP effort.

#### **Protest**

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously.

The protest must be submitted electronically and must be received within 20 days after the date of this Advice Letter, which is April 4, 2024. Protests should be submitted to the attention of the Energy Division Tariff Unit at:

E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

In addition, protests and all other correspondence regarding this Advice Letter should also be sent electronically to the attention of:

Attn: Gary Lenart  
Regulatory Tariff Manager  
E-mail: [GLenart@socalgas.com](mailto:GLenart@socalgas.com)  
E-mail: [Tariffs@socalgas.com](mailto:Tariffs@socalgas.com)

#### **Effective Date**

D.23-06-055 directs SoCalGas to submit this Advice Letter as Tier 3 pursuant to General Order (GO) 96-B and, as such, requires a Resolution to be issued by the Commission. Accordingly, SoCalGas respectfully requests that it be approved by the Commission at the earliest opportunity.

**Notice**

A copy of this Advice Letter is being sent to SoCalGas' General Order (GO) 96-B service list. Address change requests to the GO 96-B service list should be directed via e-mail to [Tariffs@socalgas.com](mailto:Tariffs@socalgas.com) or call 213-244-2424.

A copy of this Advice Letter is being sent to SoCalGas' General Order (GO) 96-B service list and the Commission's service list in R.13-11-005 and A.22-02-005. Address change requests to the GO 96-B service list should be directed via e-mail to [Tariffs@socalgas.com](mailto:Tariffs@socalgas.com) or call 213-244-2424. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or via e-mail at [Process\\_office@cpuc.ca.gov](mailto:Process_office@cpuc.ca.gov).

*/s/ Joseph Mock*

Joseph Mock

Director – Regulatory Affairs



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:  
E-mail:  
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes     No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
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Utility Name:  
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State: Zip:  
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Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
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