Date of Hearing: April 30, 2025

ASSEMBLY COMMITTEE ON UTILITIES AND ENERGY Cottie Petrie-Norris, Chair

AB 1167 (Berman) – As Amended April 21, 2025

SUBJECT: Electrical corporations and gas corporations: rate recovery: political activities and promotional advertising

SUMMARY: Expands the types of activities an electrical or gas corporation (i.e., investorowned utilities, IOUs) is prohibited from recovering in rates by expanding the definitions of political activities and advertising, and requiring specified reporting of related activities. The bill would also require the California Public Utilities Commission (CPUC) to assess specified civil penalties for any violations of the proposed prohibitions. Specifically, **this bill**:

- 1) Defines "above-the-line account" as an account that contains expenses that a utility recovers from ratepayers, including an account that contains expenses that the utility used to calculate a revenue requirement request in its general rate case (GRC).
- 2) Defines "below-the-line account" as an account that contains expenses that utility does not recover from ratepayers.
- 3) Defines "covered business unit" as a division, department, or other organizational employee group within a utility that performs specified activities.
- 4) Provides that "expense" includes a payment to an external entity, a costs incurred by a parent company or corporate affiliate and invoiced to a utility, and compensation paid to an employee of a utility.
- 3) Defines "political influence activity" as any of the following:
 - a) An activity for the purpose of directly or indirectly influencing:
 - i) The possible adoption, repeal, or modification of federal, state, regional, or local legislation, regulations, or ordinances.
 - ii) The election, recall, appointment, or removal of a public official or the adoption of initiatives or referenda.
 - iii) The approval, modification, or revocation of franchises of a utility.
 - iv) Public opinion with respect to legislation, regulations, ordinances, elections, referenda, or ratesetting.
 - v) Decisions of federal, state, regional, or local public officials.
 - b) Research, preparation, or any other activity undertaken for the purpose of supporting any activities in (a).
- 7) Specifies "political influence activity" is not:
 - a) An activity that is directly and necessarily related to appearances before regulatory bodies in connection with the utility's existing or proposed operations of the utility's regulated system. Policies affecting the use of gaseous fuels or electricity are not directly and necessarily related to the utility's existing or proposed operations.

- b) An activity that is directly related to a commission-approved energy efficiency program or another commission-approved public purpose program if the participation of the utility has not otherwise been prohibited by the commission.
- 5) Defines "promotional advertising" as written, online, video, or audio communications that primarily build the public image of a utility, including communications about the undergrounding of electrical lines or other actions that a utility may take in the future.
- 6) Specifies "promotional advertising" is not:
 - a) Public messages that the utility is directed to publish by a federal, state, or local agency.
 - b) Public messages providing information on safety measures, emergency conditions, or service interruptions.
 - c) Public messages providing necessary information to customers about specific actions the customers can take for their safety.
- 6) Defines "public official" to mean a decisionmaker within an administrative agency or legislative body at the local, regional, state, or federal level, or an executive officer at the local, regional, state, or federal level.
- 7) Provides definitions for other terms throughout, including "compensation," "utility," "utility affiliate," and "vendor." Specifies "utilities" are electrical or gas IOUs.
- 8) Prohibits, except as provided, a utility from recording to an above-the-line account (thus requiring shareholders to pay) direct or indirect costs of any of the following:
 - a) Membership dues, sponsorships, or other contributions to an industry trade association, group, or related entity incorporated under Section 501 of the Internal Revenue Code of 1986, as amended, if any portion of those contributions support political influence activities or advertising. This paragraph does not apply to fees for professional licenses necessary for employee job duties.
 - b) Charitable giving, including contributions to an organization that qualified under Section 501(c)(3) or 501(c)(4) of the Internal Revenue Code of 1986, as amended.
 - c) Political influence activities.
 - d) Promotional advertising.
 - e) Payments to outside attorneys or experts for work related to commission proceedings that exceed the hourly rates that would be permitted for rate recovery under the commission's intervenor compensation program.
 - f) Contributions to political candidates, political parties, campaign committees, issue committees, or independent expenditure committees, or other political expenses.
 - g) Litigation regarding existing or proposed federal, state, regional, or local regulations, legislation, or ordinances.
 - h) A cost, including marketing, administration, or customer service, for products or services not regulated by the commission.
 - i) Penalties or fines, including tax penalties or fines, issued against a utility.
 - j) Board of directors' and officers' liability insurance, and travel, lodging, food, or beverage expenses for a utility's board of directors and officers or the board of directors and officers of a utility affiliate.
 - k) An owned, leased, or chartered aircraft for the utility's board of directors and officers or the board of directors and officers of a utility affiliate.
 - 1) Investor relations.

- 9) Clarifies the prohibitions of (8) do not prohibit a utility from recording to an above-the-line account payments made pursuant to specified labor standards and laws, and does not restrict any use permitted by federal law of moneys paid pursuant to those federal acts.
- 10) Requires a utility to clearly and conspicuously disclose in all of its public messages whether the costs of the public messages are being paid for by the utility's shareholders or ratepayers. Clarifies a disclosure is not clear and conspicuous if the disclosure is difficult to hear or read, or if the placement of the disclosure is easily overlooked.
- 11) Require utilities to identify, in response to a public request, which expense or capital account is the source of the funding, for public messages recorded to an above-the-line account,
- 12) Requires IOUs to annually report, starting April 30, 2026, expenses for the previous year. Specifies the report shall include: a list of covered business units of the utility, a list of each employee's name and job title; a job description of each listed employee sufficient to describe the employee's responsibilities; he total annual compensation provided to each listed employee; the number of hours booked to an above-the-line account for each listed employee; and the percent of total annual compensation booked to an above-the-line account for each employee.
- 13) Further specifies the report shall include: the Federal Energy Regulatory Commission's (FERC) Uniform System of Accounts (USoA) number when the utility retains outside vendors to perform work; and a detailed accounting of expenses booked above-the-line.
- 14) Requires the California Public Utilities Commission (CPUC) to make all annual reports of (12) public. Authorizes the CPUC to redact information, as specified.
- 15) Requires the CPUC to monitor and investigate compliance.
- 16) Grants the Public Advocates Office the same authority to discover information and monitor utility accounts
- 17) Specifies moving an expense to a below-the-line account after it was booked to an above-the-line account does not protect that expense from being disclosed to the CPUC or disclosed in response to a discovery request or order in a general rate case or other relevant commission proceeding.
- 18) Requires one-quarter of the moneys collected, upon appropriation by the Legislature, to be used by the CPUC to increase resources for enforcing this bill's requirements

EXISTING LAW:

Pursuant to Federal Law:

1) Provides that no electric utility may recover from any person other than the shareholders (or other owners) of the utility any direct or indirect expenditure by such utility for political advertising. This is defined to include advertising intended to influence public opinion with respect to legislative, administrative, or electoral matters, or with respect to any controversial issue of public importance. (16 U.S. Code § 2623(b)(5))

- 2) Defines "political advertising" as any advertising for the purpose of influencing public opinion with respect to legislative, administrative, or electoral matters, or with respect to any controversial issue of public importance. (16 U.S. Code § 2625 (h)(1)(B))
- 3) Defines "promotional advertising" as any advertising for the purpose of encouraging any person to select or use the service or additional service of an electric utility or the selection or installation of any appliance or equipment designed to use such utility's service. (16 U.S. Code § 2625 (h)(1)(C))
- 4) Excludes from the definitions of political and promotional advertising information on energy conservation and reduction of peak demand, advertising required by law, information regarding service interruptions, safety measures, or emergency conditions; advertising concerning employment opportunities with the utility; promotion of energy efficient appliances, equipment or services; or any information to explain or justify existing or proposed rate schedules (16 U.S. Code § 2625 (h)(2))
- 5) Provides under FERC USoA certain types of advertising expenses, especially promotional advertising, must be recorded in separate accounts and are not allowed to be recovered through customer rates unless specifically justified. (18 Code of Federal Regulations § 101)

Pursuant to State Law:

- 6) Establishes and vests the CPUC with regulatory jurisdiction over public utilities, including electrical and gas corporations. (Article XII of the California Constitution)
- 7) Authorizes the CPUC to fix the rates and charges for public utilities and requires those rates and charges to be just and reasonable. (Public Utilities Code § 451)
- 8) Prohibits a public utility from including any bill for services or commodities furnished by any customer or subscriber any advertising or literature designed or intended (1) to promote the passage or defeat of a measure appearing on the ballot at an election, (2) promote or defeat of a candidate to any public office, (3) to promote or defeat the appointment of any person to any administrative or executive positions in government, or (4) to promote or defeat any change in legislation or regulations. (Public Utilities Code § 453 (d))
- 9) Provides the CPUC with general, broad authority to regulate every public utility in the state. (Public Utilities Code §701)
- 10) Prohibits an electrical or gas corporation, except for Golden State Energy, from recovering a fine or penalty through a rate approved by the CPUC. (Public Utilities Code § 748.1)
- 11) Authorizes the CPUC to require a public utility to correct any rates, practices, equipment or behavior that is unjust, unreasonable, unsafe, improper, inadequate, or insufficient. (Public Utilities Code § 761)
- 12) Prohibits the CPUC from prescribing a system of accounts and form of accounts, records, and memoranda for corporations subject to the regulatory authority of the United States that is inconsistent with that established and updated by or under the authority of the United States. (Public Utilities Code § 793)

- 13) Requires the CPUC to disallow all expenses for advertising which encourage increased consumption in rates charged by electrical or gas corporations for the services or commodities furnished by the utility. Allows the CPUC to include in rates charges for services, expenses for advertising which encourage the more efficient operation of the electric, or gas plant, or for advertising which encourage the more efficient use of electricity or gas, or the conservation of energy or natural resources, or presents accurate information on the economical purchase, maintenance, or effective use of electrical or gas appliances and devices. (Public Utilities Code § 796)
- 14) Provides the CPUC authority to levy fines against regulated entities for violation of law. Generally prevents the CPUC from distributing, expending, or encumbering any moneys received by the CPUC as a result of any CPUC proceeding or judicial action until the CPUC has notified the Director of Finance and the Director of Finance provides notice to the chairpersons of the appropriate legislative budget subcommittees, except where statute expressly provides how the monies are to be paid or used. Requires penalties to be deposited in the State's General Fund. (Public Utilities Code §§ 2100, et seq.)
- 15) As it relates to Community Choice Aggregator (CCA) programs, the CPUC has explicit authority over other matters they determine necessary or advisable to protect a ratepayer's right to be free from forced speech or to implement portions of the federal Public Utility Regulatory Policies Act of 1978 that establishes the federal standard that no electric utility may recover from any person other than the shareholders or other owners of the utility, any direct or indirect expenditure by the electric utility for promotional or political advertising. (16 U.S. Code § 2623(b)(5)) (Public Utilities Code § 707(a)(5))

FISCAL EFFECT: Unknown. This bill is keyed fiscal, and will be referred to the Assembly Committee on Appropriations for its review.

CONSUMER COST IMPACTS: Unknown.

BACKGROUND:

Rate Cases – CPUC-regulated utilities routinely submit requests for cost recovery related to their operations, including expanding their infrastructure, paying for operating expenses, and many other costs necessary to provide essential service to their customers. As required by statute in Public Utilities Code § 451, the CPUC may only approve a utility's request for cost recovery that is deemed just and reasonable. The review of a utility's expenses is largely, although not exclusively, conducted through the utility's General Rate Case (GRC). GRCs are proceedings used to address the costs of operating and maintaining the utility system and the allocation of those costs among customer classes. The CPUC reviews detailed cost data for various areas of utility operations and approves a budget for the first year – called a test year – of the GRC cycle. For years 2, 3, and 4 – called post-test years – the GRC decision prescribes how to adjust the test year budget for inflation and other factors that may affect costs, such as additional capital projects between test years. The GRCs are major regulatory proceedings and provide the CPUC an opportunity to perform an exhaustive examination of a utility's operations and costs with input from all stakeholders. Each large electric IOU files a GRC application every four years.

Disallowance – Statute prohibits IOUs from recovering from ratepayers certain expenses, including activities related to elections of candidates, legislation, bonuses paid to executives of

the IOU under specified conditions, marketing activities against CCAs, as well as, any situation where the IOU has failed to maintain sufficient records to enable the CPUC to evaluate any issues related to the prudence of the expense. Under federal requirements, IOUs are also prohibited from recovering from any person other than shareholders direct and indirect expenditures for promotional or political advertising.

FERC accounting and financial reporting – FERC has established regulatory accounting and financial reporting requirements for its jurisdictional entities in the electric, natural gas, and oil pipeline industries. These requirements ensure FERC, like the CPUC, set just and reasonable cost-of-service rates. The foundation of the FERC's accounting program is the USofA codified in the 18 Code of Federal Regulations § 101. The USofA does not specify a single, fixed number of account types; rather, it is a comprehensive framework with numerous accounts organized by function, subfunction, and asset type. The USofA includes accounts for expenses such as land, land rights, structures, improvements, and various types of equipment, as well as operating and maintenance expenses. FERC issues accounting rulings relating to specific transactions and applications through orders and Chief Accountant guidance letters, which promote consistent and transparent accounting information for FERC and other stakeholders. FERC jurisdictional entities are required to maintain their books and records in accordance with the USofA.

COMMENTS:

- 1) Author's Statement. According to the author, "In recent years, energy bills in California have skyrocketed, deepening the cost of living crisis and leaving nearly one in five Californians behind on their utility bills. The California Ratepayer Protection Act, by helping lower utility bills, will take an important step toward providing relief for hardworking Californians. This bill is a common sense proposal to hold investor-owned and profit-driven utilities accountable when they attempt to fleece customers for expenses that utility shareholders should be paying for, such as political lobbying, promotional marketing, or shareholder-related expenses like travel on private jets. At a time when these utilities are reaping record profits, and Californians are paying record high utility bills, it is not right to force ratepayers to pay for activities that only serve to benefit shareholders."
- 2) *Purpose of Bill.* Both federal and state statute prohibits IOUs from recovering from ratepayers certain expenses, largely cost unrelated to providing safe and reliable service. FERC rules clearly state utilities have no discretion in booking lobbying or advocacy expenses in various accounts other than FERC Account 426.4. The CPUC prohibits the use of ratepayer funds for political activities. All expenditures for civic, political, and related activities must be booked to FERC Account 426.4. Furthermore, Pub. Util. Code § 796(a) and PURPA require the CPUC to disallow ratepayers from being charged for advocacy and advertising encouraging increased energy consumption.¹

The sponsors contend that IOUs have been undertaking a pattern of behavior counter to these rules, and further note "California law does not currently define the types of political expenses utilities must charge to their shareholders." The CPUC acknowledges

¹ 15 U.S.C. Section 3203 (b)(2) and Section 3204(b).

² Vespa, M. and Tinnin, A., "Re: AB 1167 – Sponsor Letter of Support from Earthjustice and the Utility Reform Network;" March 31, 2025.

this, noting past CPUC decisions – not statute – have articulated which expenditures benefit ratepayers, versus which do not. The CPUC notes:

- contributions to organizations that provide no specific benefits to ratepayers;
- all amounts for dues, donations, sponsorships, and contributions;
- institutional advertising (which tends to benefit the image of the company primarily);
- advertising that encourages increased consumption of utility services, such as natural gas service, or commodities furnished by regulated utilities;
- legislative advocacy costs;
- lobbying activities at federal, state, or local levels, whether directed at legislative or administrative activities;
- public relations efforts to increase the load; and
- political advocacy with which ratepayers may disagree.³

The sponsors cite the continual "pattern of misclassification" found with some IOUs, forcing intervenors to spend extensive time in GRC proceedings requesting disclosure of this information in order to ensure customers are protected from bearing these costs. The sponsors cite various incidents where Southern California Gas Company (SoCalGas) used or attempted to use ratepayer funds to influence regulatory and local ordinances that supporters of this bill contend are not directly related to the safe operation of the system. Specifically, they list SoCalGas' involvement in the development of air quality State Implementation Plans at the California Air Resources Board, the South Coast Air Quality Management District's Indirect Source Rule, and the utility's funding for legal expenses for the California Restaurant Association's challenge of the City of Berkeley's ban on natural gas hookups in new construction.

The CPUC recently ruled on this "pattern of misclassification" in SoCalGas's GRC (D.24-12-074) noting SoCalGas engaged in repeated misclassification of expenses. Rather than citing or penalizing SoCalGas for this consistent misbehavior, the CPUC required more reporting, a self-directed formal policy, and employee training, among other requirements.⁵ The sponsors of this bill note frustration with the lack of repercussions, especially given the extensive effort it required to uncover this misbehavior. They note "by establishing mandatory penalties for noncompliance with its provisions, AB 1167 creates a strong shareholder incentive for utilities to properly categorize their expenses at the time they are incurred."

3) *Hazy Divisions*. As a foundational stance, the supporters of this bill contend that utilities' – or at least the directors and managers of the utilities' – first priority is their fiduciary duty to their shareholders. Therefore they contend any activity outside of what is necessary to provide customers with safe and reliable service serves shareholder interest,

³ Pg. 879-880; CPUC D. 24-12-074; *Decision Addressing the 2024 Test Year GRC of SoCalGas and SDG&E;* A. 22-05-015/6; December 19, 2024.

https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf

³ https://climatecasechart.com/case/california-v-epa-4

⁴ Pg. 878; CPUC D. 24-12-074; *Ibid*.

⁵ Ordering Paragraph #56-57, pg 1103-1105; CPUC D. 24-12-074; *Ibid*.

⁶ Pg. 8; Vespa, M. and Tinnin, A., *Ibid*.

or at least, primarily serves shareholder interest. The law evidences a commitment to ensure that ratepayers will not be charged for any advocacy that does not benefit them. IOUs, writing in opposition, argue that the proposals in this bill are overbroad and could hurt customers. They suggest that the current law already protects ratepayers from funding political influence, including advertising of a political nature. They argue that the limitations imposed by this bill go beyond those in the FERC USofA accounting and could conflict.

Indeed, the clearest distinction between USofA and this measure seems to be the treatment of shareholder vs. ratepayer funds. FERC's accounts do not require utilities to split budgets between shareholders and customers upfront. Instead, advertising costs all post to operating accounts, and disallowed items (political ads) are reclassified to Account 426.4. AB 1167 requires utilities to segregate and report advertising expenses by funding source. It mandates disclosure in all ads whether costs are paid by shareholders or ratepayers. Utilities must file annual reports to the CPUC detailing each business unit's political/promotional spending and who funded it. Violations (e.g. mischarging) can incur penalties. This formalizes the split: allowable ads use ratepayer funds; all others must come from shareholders.

However, this bill in an effort to limit the number of potential loopholes for IOUs to exploit, may inadvertently capture activities that do benefit ratepayers. For instance, litigation regarding existing or proposed federal, state, regional, or local regulations, legislation, or ordinances is prohibited in this measure. The CPUC in the recent decision on SoCalGas's GRC considered IOU litigation, as well as IOUs hiring of outside legal firms for that litigation. The CPUC noted that some services from these firms "benefit ratepayers" while others did not. However, the CPUC noted it was "making no such broad rule" on the appropriateness of ratepayers funding litigation. Rather, "based on the material facts of the litigation, a distinction should be made between hiring outside law firms for routine information requests, defense against accusations of wrongdoing, or litigation to advance shareholder interests."

This bill provides no such distinction. All litigation of government activities would be considered as serving shareholder interests, and thus shareholder funded. This may miss opportunities for the IOUs to advocate *on behalf* of policies, such as Pacific Gas & Electric Company's 2019 participation in legal action to support California's greenhouse gas emission standards. Given the current posture of the federal administration toward California's decarbonization goals, it may be prudent to reconsider the restriction proposed in this measure. SoCalGas also notes an instance where cities were double charging utilities by requiring trench cutting fees; SoCalGas challenged these fees and won, saving customers money. *Given these considerations, the committee recommends striking the prohibition on litigation from the bill.*

⁷ Pg. 725; CPUC D. 24-12-074; *Decision Addressing the 2024 Test Year GRC of SoCalGas and SDG&E;* A. 22-05-015/6; December 19, 2024. https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K485/550485071.pdf https://climatecasechart.com/case/california-v-epa-4

⁸ as part of the National Coalition for Advanced Transportation (NCAT); *National Coalition for Advanced Transportation v. EPA*, Docket No. 18-1118; https://climatecasechart.com/case/california-v-epa-4

4) Public Advocate's Discovery. In 2019 the Sierra Club alleged that an association, known as California for Balanced Energy Solutions (C4BES), which moved to obtain party status within a building decarbonization proceeding was actually funded by SoCalGas. Subsequently the Public Advocates Office (PAO) began investigating the allegation which culminated in efforts to compel discovery by the utility, including of contracts funded by shareholders. Ultimately, the CPUC sided with PAO and rejected the utility's claim to First Amendment infringement on freedom of speech. SoCalGas then appealed to the courts. The court sided with SoCalGas in Southern California Gas Co. v. Public Utilities Com. (2023) 87 Cal. App. 5th 324.9

In that case, SoCalGas was successful in arguing that the PAO inquiries were an infringement on the utility's First Amendment rights. The decision distinguished between the statutory authority of PAO, viewed as narrower than that of the CPUC, while also acknowledging that SoCalGas has shown that disclosure of contracts funded by shareholders would impact its First Amendment rights. Furthermore, the court was convinced that disclosure of such information could result in a chilling effect on SoCalGas' ability to contract for services and that impact outweighs the interest to view the contracts paid by shareholders.

This bill wades into this court case, by clearly stating the PAO has the same authority to discover information and review utility accounts as the CPUC. SoCalGas, writing in opposition, takes issue with this provision of the bill. SoCalGas notes, "the Court of Appeal clearly found that the PAO's discovery rights are limited to that which is 'necessary to perform its duties.' ... the Court of Appeal stated, 'The PAO and CPUC's discovery rights would be coextensive only if their duties were the same, which they are not."

Nevertheless, as a statutory body, the PAO may be granted more duties and authority statutorily, as is the case in this bill. Yet, the relevant provision related to PAO's new discovery authority is buried within the new disclosure statute this bill would create. As currently drafted, this authority clarification is a power of PAO broadly, not just within the above-the-line reporting envisioned in this measure. To provide greater clarity and Public Utilities Code management, the committee recommends moving this provision on PAO authority to § 314 of the Public Utilities Code.

5) Dollars and Incentives. The final provision of this bill provides that one-fourth of the moneys collected from penalties shall be used by the CPUC for purposes of increasing resources to enforce this measure, as appropriated by the Legislature. While a laudable effort to identify a funding source to keep the costs out of rates, this provision breaks the standard practice of this committee. Traditionally, the idea is that the CPUC should not have a financial incentive to issue more fines; meaning, they shouldn't benefit directly from the money they collect through enforcement. Normally, when the CPUC fines a utility, the money collected goes into the state General Fund, not directly back to the CPUC. While it's understandable that the CPUC needs money to enforce the new law, this approach could create a conflict of interest and violates the standard practice meant

 $^{^9\} https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/in-the-news/45---court-of-appeal-socalgas-v-cpuc--87-cal-app-5th-324-2023.pdf$

to protect public trust. As such, the committee recommends striking subdivision (i) of § 748.3.

6) Related Legislation.

AB 1222 (Bauer-Kahan) makes a number of changes to the judicial review of actions by the CPUC, including prohibiting IOUs from seeking to recover certain legal expenses from ratepayers. Status: *Set for hearing* in the Assembly Committee on Judiciary after passage in this committee on April 23, 2025, on a 12-3-3 vote.

7) Prior Legislation.

SB 938 (Min, 2024) expanded the types of activities an electrical or gas corporation is prohibited from recovering in rates by expanding the definitions of political activities and advertising, and requires specified reporting of related activities. The bill also required the CPUC to assess specified civil penalties for any violations of the proposed prohibition and require three-fourths of the monies to be deposited in a new Zero-Emission Equity Fund within the State Treasury. Status: *Died* – Senate Committee on Energy, Utilities, and Communication.

REGISTERED SUPPORT / OPPOSITION:

Support

350 Bay Area

350 Bay Area Action

350 Humboldt

350.org

AARP

Ad 73 Adem Delegate Ryan Dack

Agricultural Energy Consumers Association

Asian Pacific Environmental Network

Cadem Assembly District 73 Elected Delegates

California Environmental Voters

California Solar & Storage Association

Center for Biological Diversity

Clean Earth 4 Kids

Climate Action California

Climate Action Campaign

College Democrats At UC Irvine

Earthjustice – *co-sponsor*

Facts Families Advocating for Chemical and Toxics Safety

Institute for Local Self-reliance

Media Alliance

Nextgen California

Our Power

Rewiring America

San Francisco Bay Physicians for Social Responsibility

San Francisco Baykeeper

Sierra Club

Sunrise Movement Orange County Sustainable Rossmoor The Climate Center The Utility Reform Network (TURN) – co-sponsor Union of Concerned Scientists Vote Solar

Oppose

California Chamber of Commerce Edison International and Affiliates, Including Southern California Edison Pacific Gas and Electric Company and its Affiliated Entities San Diego Gas and Electric Company Southern California Gas Company

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