

2025 Core Transport Agent Program Annual Report

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**California Public
Utilities Commission**

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Background and Summary

Since 1991, the California Public Utilities Commission (CPUC) has allowed all core customers¹ of the state's regulated natural gas utilities the option to choose a non-utility gas supplier to procure their supply of natural gas.² The program is intended to create competition between regulated and unregulated gas suppliers and to give consumers a choice of providers. The unregulated gas suppliers, known as Core Transport Agents³ or CTAs, procure gas for the residential and small commercial customers known as "core" customers. The gas supplied by CTAs is delivered over the regulated utilities' pipeline systems.

The CPUC does not regulate the rates or fees for gas services supplied by CTAs. Customers who are considering leaving the regulated gas utility for CTA gas services are encouraged to carefully review the CTA's prices, terms, and conditions and compare them with those of the gas utility's prior to signing any agreement with the CTA.

In 2013, Senate Bill 656 required the CPUC to regulate certain aspects of CTA services having to do with consumer protection and the resolution of consumer complaints. In 2018, Decision (D.) 18-02-002 established an annual CTA fee (Annual Fee) that was to be based on the cost of administering the CTA program. The decision also required the CPUC's Energy Division staff (staff) to submit a *Core Transport Agent Program Annual Report (CTA Annual Report)* on these costs and to recommend appropriate changes to the Annual Fee reflecting those costs. In 2022, the Commission approved Resolution G-3589, which established a Base Fee of \$3,864 and a Variable Fee that reflected the variable costs resulting from the number and type of complaints received for each CTA.⁴

In the *2023 CTA Annual Report*, staff proposed an increase to the Base Fee from \$3,864 to \$5,000. This proposed increase was driven by an increase in staff salary costs caused by the end of a 10 percent reduction in salaries during the Covid pandemic, other salary increases, and a small reduction in the number of CTAs, due to one CTA being acquired by another. Staff also proposed that the Base Fee remain at \$5,000 in future years unless administrative costs are more than 20 percent higher or lower than that figure. Staff further proposed a change in the methodology for calculating the Variable Fee to more precisely allocate enforcement costs. These proposals were approved by the CPUC in Resolution G-3597.⁵

¹ Core customers are made up of small residential and commercial customers. CTAs do not serve the large commercial and industrial customers known as noncore customers.

² D.91-02-040

³ Also referred to as core aggregation service.

⁴ Resolution G-3589 <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M490/K129/490129633.PDF>.

⁵ Resolution G-3597: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M509/K545/509545115.PDF>.

CTA Registration

There are currently 36 CTAs registered with the CPUC.⁶ Energy Division staff are responsible for the registration process. Staff review the CTA's filings for evidence of its operational and technical abilities and financial health. Key CTA personnel are required to pass a background check with the California Department of Justice before a CTA is eligible to complete registration.

In 2024, two CTAs completed the deregistration process. Neither reported the reason why they voluntarily withdrew from the market.

CTA Program Administration and Customers Protections

Several groups within the CPUC administer the CTA program and work to ensure consumer protection. These groups include Energy Division, the Consumer Affairs Branch (CAB), the Utility Enforcement Branch (UEB), and the Fiscal Office. Energy Division is charged with administering the CTA program, registering CTAs, creating and updating the CTA website, monitoring complaints, responding to consumers' and CTA inquiries, providing guidance to CTAs on how to enter and withdraw from the California market, collecting rate information from CTAs to display on the CPUC's website, and conducting analysis on CTA-related issues for decisionmakers.

CAB receives consumers' CTA-related complaints both by phone and in writing. CAB engages with the CTAs to resolve consumers' concerns, which generally center on billing, service issues, and deceptive marketing. Throughout this reporting period, CAB also created the Monthly CTA Complaint Report that documents consumer complaints by type and submits it to the Utility Enforcement Branch and Energy Division.

UEB's work has two parts. First, UEB staff analyze both the Monthly CTA Complaint Report and the complaints it receives from local District Attorney's offices, looking for overall patterns and trends, with a focus on complaints related to unauthorized enrollment. Second, UEB staff pursue citations against individual CTAs who fail to comply with the standard for verifying enrollment or to abide by the California Public Utilities Code or CPUC decisions when the initial screen indicates that such action is warranted.

Fiscal Office staff record, track, and receive the financial resources that the CTAs post to the CPUC. Fiscal Office staff also inform Energy Division staff when registered CTAs submit the Annual Fee payment and verify that the posted amounts are correct and paid on time. If necessary, they will assess late payment fees.

⁶ List of registered CTAs from the CPUC website: [regcta060622.pdf \(ca.gov\)](https://www.cpuc.ca.gov/regcta060622.pdf).

Costs of Administering the CTA Program

Some of the costs incurred to administer and oversee the CTA program are fixed and some vary depending on the number and type of complaints received.

Fixed costs include the cost to Energy Division of administering the program as well as the cost to CAB of compiling the Monthly CTA Complaint Report. These activities and associated costs do not vary materially with the number of CTA-related complaints received.

Costs associated with responding to complaints are variable and depend on the number and type of complaints received. These include CAB costs associated with receiving and attempting to resolve CTA-related consumer complaints and the cost of UEB investigations and enforcement actions.

The purpose of the CTA Annual Fee is to cover the CPUC's costs in administering the CTA program and responding to complaints. Resolution G-3580 divided the Annual Fee into a Base Fee and a Variable Fee. The Base Fee corresponds with fixed costs and is allocated to all CTAs equally. Since not all CTAs contribute equally to complaint-related costs, Resolution G-3580 determined that they should be allocated on a cost-causation basis. Individual CTAs thus incur a Variable Fee based on the number and type of complaints and enforcement actions attributed to them. If a CTA receives no complaints and is not the subject of any enforcement actions, it pays no Variable Fee.

For example, in 2024,⁷ four CTAs—AAA Natural Gas, SFE Energy Inc., United Energy Trading LLC dba Collective Energy, and Wave Energy—generated 70 percent of all complaints. An additional 17 CTAs accounted for the remaining 30 percent of the complaints. CAB and UEB received no complaints for 15 CTAs.

Every year, Energy Division staff calculate the compensation costs for CAB and UEB staff to respond to phone contacts and informal written complaints and to conduct investigations. Because these costs are incremental, it is reasonable to divide them proportionally amongst the CTAs who were the subject of complaints or enforcement actions. This results in a more reasonable and fair allocation of costs that better aligns an individual CTA's Annual Fee with the actual administrative costs associated with that CTA.⁸

⁷ The Annual Fee for the current year is based on the median staff salary, complaints, and actions or citations from the prior calendar year. Therefore, the Annual Fee for 2025 is based on what occurred in 2024.

⁸ The Base Fee includes the sum of the fixed costs over the most recent 12-month period July 1 through June 30, in this case fiscal year 2023-2024. The Variable Fee covers the variable costs for the 12-month period January 1 through December 31, 2024, based on the number and type of complaints received and the costs incurred by the CPUC in resolving those complaints and pursuing enforcement actions.

2025 Base Fee

The Base Fee reflects the compensation costs for the positions involved in the management and administration of the program. To make the Base Fee more stable over time, compensation costs are calculated using the median⁹ of the salary range for the relevant position plus employee benefit costs during the most recent fiscal year, in this case 2023-2024.¹⁰ The compensation costs are then multiplied by the average amount of time the position is involved in activities required for the CTA program.

For Energy Division, these costs include two permanent full-time staff: one Public Utilities Regulatory Analyst (PURA) I at 100 percent time and one Program and Project Supervisor (PPS) for 15 percent of the time. For CAB, the base cost includes the cost of a PURA I who allocates approximately 0.80 percent of their time to creating the Monthly CTA Complaint Reports.

The total of these costs is shared equally by each CTA according to the formula below:

$$\text{Base Fee per CTA} = \text{Total Fixed Costs} \div \text{Number of Registered CTAs}$$

The fiscal year 2023-2024 Total Fixed Costs used for this report are \$159,134.18 divided evenly amongst the 36 CTAs (see Table 1).¹¹

Table 1: Fixed Costs for Fiscal Year 2023-2024 (2025 CTA Annual Report)

CPUC Organizational Area	Position	Median Salary + Benefits	% Time on CTAs	# of CTAs	CTA Cost
Energy Division	PURA I	\$120,244.92	100%		\$120,244.92
Energy Division	PPS	\$252,848.67	15%		\$37,927.30
Consumer Affairs Branch	PURA I	\$120,244.92	0.80%		\$961.96
Total Base Cost					\$159,134.18
Base Cost Per CTA				36	\$4,420.39

To make the Base Fee more stable year-to-year while still maintaining the flexibility to respond to inflation or changes in personnel costs, in 2023, staff proposed that the Base Fee be set at \$5,000 and remain at that level in future years unless actual administrative costs are 20 percent higher or lower than \$5,000. If staff find that administrative costs are outside the 20 percent tolerance band in the *CTA Annual Report*, staff will

⁹ Median amount is the average of the min and max range of the CALHR pay scale range for each classification.

¹⁰ Position compensation costs are based on the median salary plus benefits for the level of the staff assigned to the program.

¹¹ Small discrepancies related to rounding may be found in the calculations in this report.

submit a resolution to change the fee. Since the fixed costs for 2025 are within 20 percent of \$5,000, there is no change to the Base Fee.

2025 Variable Fee

Variable costs for CTA-related consumer protections reflect the hours CAB and UEB spent responding to consumer complaints and pursuing consumer protection actions in the previous calendar year: 2024. Thus, the Variable Fee has two parts: one for CAB and one for UEB. For CAB, these costs vary by the number and type of complaints received. For UEB they vary by the number of unauthorized enrollment complaints received and the number of UEB actions. For 2025, the combined variable costs for CAB and UEB totaled \$696,617.62 as shown in Table 2 below.

Table 2: 2025 Total Variable Costs

CPUC Organizational Area	CTA Costs
CAB	\$110,248.94
UEB	\$586,368.68
Total Variable Costs	\$696,617.62

Variable Fee: CAB

Consumers typically contact CAB for assistance when they do not receive a resolution from the CTA’s customer service department. During 2024, CAB received a total of 1,685¹² CTA-related complaints and inquiries, which is comparable with the 1,682 complaints addressed in 2023. Of these, 1,140 were received by phone and 546 were informal written complaints. CAB also received five inquiries, which were not included in the Variable Fee. The cost of responding to a complaint varies based on the average time involved. Phone contacts are incoming calls from consumers seeking assistance with a CTA-related issue and require significantly less time to resolve than informal written complaints. Thus, they are less expensive (see Table 3 below). If the consumer is unable to resolve a problem with a CTA after receiving phone assistance, CAB encourages them to submit an informal written complaint. CAB submits informal written complaints to the CTA, which is required to provide a resolution in writing. CAB then informs the consumer of the outcome.

¹² Energy Division acknowledges that CAB may collect the data more frequently, therefore, showing a discrepancy. CAB continuously updates the complaint information until the case has been officially closed. Therefore, the subject and number of complaints may reflect a discrepancy from CAB’s Quarterly Reports. This complaint information was collected in March 2025.

Table 3: 2025 Variable Cost by Complaint Type: CAB

	Complaints by Type	Average Hours per Complaint	Median Cost per Hour	Cost Per Complaint	Total Cost
Phone Contacts	1,139	0.11	\$53.99 ¹³	\$5.94	\$6,770.89
Informal Written Complaints	546	3.51	\$53.99	\$189.52	\$103,478.05
Total	1,685				\$110,248.94

To calculate CAB costs, staff use the following methodology:

Cost per phone contact¹⁴ multiplied by the CTA’s number of phone contacts; plus,
 Cost per informal written complaint multiplied by the CTA’s number of informal written complaints.

For the 2025 fee, the cost per Phone Contact is \$5.94, and the cost per Informal Written Complaint is \$189.52.

Variable Costs: UEB

The second factor in the Variable Fee is the cost of the investigation and citation programs conducted by the Utility Enforcement Branch. UEB staff are responsible for investigating allegations of unauthorized enrollment and identifying trends in complaints pursuant to Resolution UEB-003,¹⁵ issuing citations, and collecting fines. To calculate total UEB costs, staff use the median salary and benefits for each position multiplied by the percentage of time each person spent on CTA-related investigations in the preceding year¹⁶ as shown in Table 4 below.

In 2024, UEB assigned an additional PURA III to the CTA Program. Additionally, in order to keep up with the increased number of investigations, the percentage of staff time specifically dedicated to CTAs increased across all staff levels.

¹³ Energy Division staff receive CAB’s median cost per hour from the Administrative Services Division

¹⁴ CAB maintains statistics concerning the time associated with phone contacts and informal written complaints.

¹⁵ UEB-003: [236850987.PDF \(ca.gov\)](https://www.sos.ca.gov/energy/003/236850987.PDF).

¹⁶ There are additional CAB variable costs that can only be estimated. These are considered to be less than \$500 and are not included in this analysis. Additionally, there are costs associated with the citations generated by the Utility Enforcement Branch that cannot be reliably estimated at this time.

Table 4: 2024 Variable Cost: UEB

Position	Median Annual Salary + Benefits	% Time on CTAs	CTA Cost
PM	\$291,390.15	20%	\$58,278.03
PPS	\$252,848.67	30%	\$75,854.60
PURA V	\$191,956.13	15%	\$28,793.42
PURA IV	\$174,732.67	20%	\$34,946.53
PURA III	\$159,105.71	60%	\$95,463.43
PURA III	\$159,105.71	80%	\$127,284.57
PURA II	\$142,304.85	70%	\$99,613.40
PURA I	\$120,244.92	55%	\$66,134.71
Total			\$586,368.68

In the 2021 and 2022 *CTA Annual Reports*, ED staff allocated UEB costs evenly for all complaint types because UEB staff review all CTA-related complaints to identify allegations of unauthorized enrollment and trends in the complaints. In the 2023 report, ED staff proposed two changes to more precisely allocate UEB costs. First, UEB costs are allocated only to those CTAs who were the subject of alleged unauthorized enrollment complaints since that is UEB’s focus. Second, staff proposed a method that divides UEB costs between time spent investigating allegations of unauthorized enrollment and time spent pursuing enforcement actions. Both changes were adopted in 2023, and the standard allocation methodology is as follows:

- Disaggregate total UEB costs between enforcement actions and alleged unauthorized enrollment investigations by dividing the number of UEB actions by the number of unauthorized enrollment complaints.
- Multiply the resulting percentage by total UEB costs to determine the amount to allocate towards enforcement.
- Allocate the remainder toward alleged unauthorized enrollment complaint investigations.
- Divide alleged unauthorized enrollment investigation costs equally per unauthorized enrollment complaint.
- Divide enforcement actions costs equally per UEB action.

In 2024, UEB staff reviewed 1,685 CTA-related complaints and identified 435 unauthorized enrollment complaints for further investigation. This is an increase of 52.1 percent in unauthorized enrollment complaints investigations compared to the 286 such complaints investigated in 2023. With regards to

enforcement actions, UEB staff issued 387 CTA-related actions totaling \$387,000^{17,18} and six cease-and-desist letters or warning notices, which equate to 393 enforcement actions.

- 393 enforcement actions ÷ 435 total alleged unauthorized enrollment complaints resulted in 90 percent of costs allocated to enforcement actions and 10 percent allocated to overall unauthorized enrollment complaints.¹⁹
 - » Total enforcement actions: $90\% * \$586,368.68 = \$529,753.77$
 - » Total alleged unauthorized enrollment complaints: $10\% * \$586,368.68 = \$56,614.91$
- Enforcement: $\$529,753.77 \div 393 \text{ UEB actions} = \$1,347.97 \text{ per action}$
- Alleged unauthorized enrollment complaints: $\$529,753.77 \div 435 \text{ complaints} = \$130.15 \text{ per complaint}$

In 2025, the cost for alleged unauthorized enrollment investigation is \$130.15 per unauthorized enrollment complaint, and the cost for enforcement is \$1,347.97 per UEB action.

2025 Annual Fee

The Annual Base Fee for the CTA program is \$5,000.

The 2025 Variable Fee for CAB-related costs is \$5.94 per Phone Contact and \$189.52 per Informal Written Complaint. The Variable Fee for UEB-related costs is \$130.15 per unauthorized enrollment complaint and \$1,347.97 per enforcement action. The total Annual Fees owed by each CTA are detailed in Appendix 1 below, which includes both the Base Fee and the Variable Fee. CTAs who receive no complaints do not pay a Variable Fee.

The CPUC Administrative Law Judge Division, Legal Division, and Fiscal Division incurred costs for the CTA program that were not examined for this year but could be included in future years if substantive.

¹⁷ The Fiscal Office collects citation payments and deposits them into the State's General Fund.

¹⁸ A list of CTA citations can be found on the bottom of the UEB Citation website: [Energy Citation Programs](#).

¹⁹ Percentages and total costs are rounded to the nearest whole number.

Appendix 1: 2025 Annual Fee for Each CTA²⁰

CTA	Phone Contacts	Informal Complaints	Unauthorized Enrollment Complaints	UEB Actions	Phone Contact Cost	Informal Complaint Cost	UEB Investigation Cost	UEB Action Cost	Variable Fee	Base Fee	Total Fee (Base + Variable)
AAA Natural Gas	117	52	58	375	\$694.91	\$9,855.05	\$7,548.65	\$505,490.24	\$523,588.86	\$5,000.00	\$528,588.86
Ambit California LLC	3	0	2	1	\$17.82	\$0.00	\$260.30	\$1,347.97	\$1,626.09	\$5,000.00	\$6,626.09
Anew RNG LLC dba Elements Markets Renewable Energy LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Big Tree Energy CA LLC	53	34	47	0	\$314.79	\$6,443.69	\$6,117.01	\$0.00	\$12,875.49	\$5,000.00	\$17,875.49
Bolt Energy Services LLC	4	2	3	0	\$23.76	\$379.04	\$390.45	\$0.00	\$793.25	\$5,000.00	\$5,793.25
BP Energy Company	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
BP Energy Retail Company LLC (Formerly EDF Energy Services LLC)	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Calpine Energy Solutions LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00

²⁰ The CPUC acknowledges that the use of Excel may result in rounding discrepancies less than or equal to five dollars.

2024 CTA PROGRAM ANNUAL REPORT

Clean Energy Renewable Fuels LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Commercial Energy of Montana Inc	1	2	0	0	\$5.94	\$379.04	\$0.00	\$0.00	\$384.98	\$5,000.00	\$5,384.98
Constellation NewEnergy - Gas Division LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Direct Energy Business LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Everyday Energy LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
GHI Energy LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Greenwave Energy LLC	7	2	1	0	\$41.58	\$379.04	\$130.15	\$0.00	\$550.77	\$5,000.00	\$5,550.77
Interstate Gas Supply Inc	1	1	0	0	\$5.94	\$189.52	\$0.00	\$0.00	\$195.46	\$5,000.00	\$5,195.46
Just Energy Solutions Inc.	3	5	2	0	\$17.82	\$947.60	\$260.30	\$0.00	\$1,225.72	\$5,000.00	\$6,225.72
Mansfield Power and Gas LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Mirabito Natural Gas LLC dba Evergreen Gas & Electric	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
National Gas & Electric LLC	7	4	3	0	\$41.58	\$758.08	\$390.45	\$0.00	\$1,190.10	\$5,000.00	\$6,190.10

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North Star Gas Company LLC dba YEP Energy	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
NRG Business Marketing LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Pacific Summit Energy LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Peak Six Power and Gas LLC	11	2	2	0	\$65.33	\$379.04	\$260.30	\$0.00	\$704.67	\$5,000.00	\$5,704.67
SFE Energy Inc.	301	145	99	3	\$1,787.75	\$27,480.43	\$12,884.77	\$4,043.92	\$46,196.88	\$5,000.00	\$51,196.88
Shell Energy North America (US) L.P.	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Smart One Energy LLC	2	1	2	1	\$11.88	\$189.52	\$260.30	\$1,347.97	\$1,809.67	\$5,000.00	\$6,809.67
Spark Energy Gas LLC	89	40	33	3	\$528.60	\$7,580.81	\$4,294.92	\$4,043.92	\$16,448.26	\$5,000.00	\$21,448.26
StateWise Energy California LLC	129	77	38	1	\$766.18	\$14,593.06	\$4,945.67	\$1,347.97	\$21,652.88	\$5,000.00	\$26,652.88
Tiger Natural Gas Inc.	0	1	0	0	\$0.00	\$189.52	\$0.00	\$0.00	\$189.52	\$5,000.00	\$5,189.52
Trillium USA Company LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
United Energy Trading LLC dba Collective Energy	157	74	55	2	\$932.48	\$14,024.50	\$7,158.21	\$2,695.95	\$24,811.13	\$5,000.00	\$29,811.13
Viridian Energy PA LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00

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Vista Energy Marketing L.P.	96	36	35	3	\$570.18	\$6,822.73	\$4,555.22	\$4,043.92	\$15,992.05	\$5,000.00	\$20,992.05
Wave Energy LLC	155	66	54	4	\$920.60	\$12,508.34	\$7,028.06	\$5,391.90	\$25,848.89	\$5,000.00	\$30,848.89
XOOM Energy California LLC	3	2	1	0	\$17.82	\$379.04	\$130.15	\$0.00	\$527.01	\$5,000.00	\$5,527.01
TOTAL	1139	546	435	393	\$6,764.95	\$103,478.05	\$56,614.91	\$529,753.77	\$696,611.68	\$180,000.00	\$876,611.68