



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking on the)
Commission's Own Motion into combined heat)
and power Pursuant to Assembly Bill 1613.)

Rulemaking 08-06-024
(Filed June 26, 2008)

REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U-338E)
ON AB 1613 PAY-AS-YOU-SAVE PILOT

MICHAEL D. MONTOYA
AMBER DEAN WYATT
TYLER R. JOHNSON

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6961
Facsimile: (626) 302-7740
E-mail: Amber.Wyatt@sce.com

Dated: June 4, 2010

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Pursuant to the Ruling of Administrative Law Judge Yip-Kikugawa, dated May 11, 2010, Southern California Edison Company (“SCE”) submits this reply to parties’ opening comments on the Pay-As-You-Save (“PAYS”) Pilot Program for certain Combined Heat and Power (“CHP”) units pursuant to Assembly Bill (“AB”) 1613.

I.

REPLY

A. Concerns Raised By Parties Necessitate A Workshop And Further Commission Consideration Of The PAYS Pilot Program.

Parties raised many similar concerns about a utility-as-lender PAYS Pilot Program. For example, like SCE, Pacific Gas and Electric (“PG&E”) and Sierra Pacific both propose that investor-owned utilities (“IOUs”) should not be required to lend funds to CHP participants under the PAYS Pilot program. As PG&E noted, “it has neither the funds nor the resources to implement a CHP customer financing program,” and the numerous risks to the IOU’s non-participating customers “indicate that an alternative to IOU financing must be found to meet the

requirement that all PAYS pilot program costs be recovered only from program participants.”¹

Sierra Pacific echoed these concerns, stating:

“Sierra is not a lending institution and is not designed to function as one.

Therefore, to reduce potential risks and liabilities associated with a pay-as-you-save pilot program, Sierra would be required to develop and implement rigorous safeguards in an arena in which it typically does not operate and which – for reasons previously stated – there is no reasonably anticipated market demand.

Such a process is inefficient and is bound to produce inefficient results. These inefficiencies will needlessly increase (sic) costs for both Sierra’s ratepayers and any potential eligible customers.”²

SCE agrees with these concerns and urges the California Public Utilities Commission (“Commission”) to consider the costs, risks, and legal and financial ramifications of adopting a utility-as-lender model for the PAYS Pilot Program. As SCE explained in its opening comments, for the sake of both simplicity and lawful program implementation, SCE continues to advocate a model that utilizes third party lenders.

Numerous parties also highlighted the statutory mandate that “all costs of the pay-as-you-save program or financing mechanisms shall be borne solely by the combined heat and power generators that use the program or financing mechanisms, and the commission shall ensure that the costs of the program are not shifted to the other customers or classes of customers of the electrical corporation.”³ For example, PG&E urges the Commission to conduct research to ensure that a program can actually be developed that will comply with this mandate. San Diego Gas & Electric (“SDG&E”) notes that “a no cross-subsidy” requirement is a critical component

¹ PG&E Opening Comments, at 4-5.

² Sierra Pacific Opening Comments, at 4.

³ Pub. Util. Code § 2842.4(e). SDG&E seems to suggest that there is some ambiguity in this language as to whether both the “technical” costs and the “programmatic” costs are to be borne by participating borrowers. The statutory language in this respect is in fact clear: AB 1613 provides that all costs of the PAYS Pilot Program shall be borne by the CHP generators using the program.

as to how any CHP financing effort will be run.”⁴ SCE agrees with these concerns, as well as PG&E’s conclusion that this statutory mandate argues in favor of a third party lending model.

Lastly, parties raise numerous other questions that must be addressed by the Commission concerning the source of funding, participant credit requirements, default eventualities, payment stream calculations, and more. These questions, as well as those raised in SCE’s opening comments must be addressed before the PAYS Pilot Program can be implemented. SCE thus urges the Commission to hold a workshop (or series of workshops, if appropriate) to address these issues.

B. The Commission Need Not Consider A Utility-Owned Leasing Option.

SDG&E suggests that the Commission concurrently explore a model in which utilities develop CHP facilities and lease them to eligible customers. SCE respectfully suggests that exploring utility-owned CHP would raise new issues and will not help in resolving the myriad challenges to developing the PAYS Pilot Program, and therefore would be an unnecessary use of time and resources. A leasing program is not contemplated by, and has no relationship to, the PAYS Pilot Program, which is designed to allow a customer to “finance all of the upfront costs for the purchase and installation of a combined heat and power system.”⁵ There is no mention of utility-owned generation or the leasing of utility-owned generation in this section of AB 1613.

C. The Energy Efficiency Program Cannot Serve As A Model For The Pays Pilot Program.

SCE agrees with PG&E that the Energy Efficiency (“EE”) Program is not an appropriate model for the PAYS Pilot Program.⁶ Although SDG&E seems to indicate that the EE Program can serve as a workable model, SDG&E acknowledges that a number of key issues would need to be “addressed from a ‘programmatic’ perspective in order to move ahead,” including

⁴ SDG&E Opening Comments, at 5.

⁵ Pub. Util. Code § 2842.4(c).

⁶ PG&E Opening Comments, at 5-6.

“treatment of on-going administrative costs, program design/implementation considerations, creditworthiness standards and treatment of loan defaults.”⁷ In fact, this list of necessary modifications is far from exhaustive. Given the number of fundamental differences between the two programs, the EE Program simply cannot serve as a viable model for the PAYS Pilot Program.

II.

CONCLUSION

SCE appreciates the opportunity to comment on the development of the AB 1613 PAYS Pilot Program. For the reasons discussed herein as well as in SCE’s opening comments, SCE recommends that the Commission conduct workshops to consider the questions raised by parties and pursue the selection of third party lenders for PAYS Pilot Program loans.

Respectfully submitted,

MICHAEL D. MONTOYA
AMBER DEAN WYATT
TYLER R. JOHNSON

/s/ Amber Dean Wyatt

By: Amber Dean Wyatt

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6961
Facsimile: (626) 302-7740
E-mail: Amber.Wyatt@sce.com

Dated: June 4, 2010

⁷ SDG&E Opening Comments, at 2-3.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **Reply Comments of Southern California Edison Company (U-338E) On AB 1613 Pay-As-You-Save Pilot** on all parties identified in the attached service list(s). Service was effected by one or more means indicated below:

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Executed this **4th day of June, 2010**, at Rosemead, California.

/s/ RAQUEL IPPOLITI

Raquel Ippoliti
Project Analyst

SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Ave.
Post Office Box 800
Rosemead, California 91770



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Parties

JORDAN A. WHITE
 SENIOR ATTORNEY
 PACIFICORP
 1407 W. NORTH TEMPLE, SUITE 320
 SALT LAKE CITY, UT 84116
 FOR: PACIFICORP

JIM SUEUGA
 ENERGY SERVICES MANAGER
 VALLEY ELECTRIC ASSOCIATION
 800 E. HWY 372, PO BOX 237
 PAHRUMP, NV 89041
 FOR: VALLEY ELECTRIC ASSOC.

STEVEN D. PATRICK
 SOUTHERN CALIFORNIA GAS COMPANY
 555 WEST FIFTH STREET, GT14G1
 LOS ANGELES, CA 90013-1011
 FOR: SAN DIEGO GAS & ELECTRIC COMPANY

JUSTIN RATHKE
 CAPSTONE TURBINE CORPORATION
 21211 NORDHOFF STREET
 CHATSWORTH, CA 91311
 FOR: CAPSTONE TURBINE CORPORATION

DANIEL W. DOUGLASS
 DOUGLASS & LIDDELL
 21700 OXNARD STREET, SUITE 1030
 WOODLAND HILLS, CA 91367
 FOR: ALLIANCE FOR RETAIL ENERGY MARKETS

CAROL SCHMID-FRAZEE
 SOUTHERN CALIFORNIA EDISON COMPANY
 LAW DEPARTMENT
 2244 WALNUT GROVE AVE.
 ROSEMEAD, CA 91770
 FOR: SOUTHERN CALIFORNIA EDISON COMPANY

RONALD MOORE
 SR. REGULATORY ANALYST
 GOLDEN STATE WATER CO/BEAR VALLEY
 630 EAST FOOTHILL BLVD.
 SAN DIMAS, CA 91773
 FOR: GOLDEN STATE WATER CO./BEAR VALLEY
 ELECTRIC

EVELYN KAHL
 ATTORNEY AT LAW
 ALCANTAR & KAHL, LLP
 33 NEW MONTGOMERY STREET, SUITE 1850
 SAN FRANCISCO, CA 94015
 FOR: ENERGY PRODUCERS AND USERS
 COALITION

MITCHELL SHAPSON
 CALIF PUBLIC UTILITIES COMMISSION
 LEGAL DIVISION

MICHEL PETER FLORIO
 THE UTILITY REFORM NETWORK
 115 SANSOME STREET, SUITE 900

ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

SAN FRANCISCO, CA 94104
FOR: THE UTILITY REFORM NETWORK

CHARLES MIDDLEKAUFF
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

MICHAEL P. ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105
FOR: COGENERATION ASSOCIATION OF
CALIFORNIA AND ENERGY PRODUCERS AND
USERS COALITION

EDWARD G. POOLE
ANDERSON & POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO, CA 94108-2818
FOR: CALIFORNIA INDEPENDENT PETROLEUM
ASSOCIATION

ANDREW L. HARRIS
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177
FOR: PACIFIC GAS AND ELECTRIC COMPANY

PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MC B9A
SAN FRANCISCO, CA 94177
FOR: PACIFIC GAS AND ELECTRIC

WILLIAM H. BOOTH
LAW OFFICES OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA, CA 94556
FOR: CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION

R. THOMAS BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710-2557
FOR: CALIFORNIA COGENERATION
COUNCIL/SAN JOAQUIN REFINING COMPANY

DAN L. CARROLL
ATTORNEY AT LAW
DOWNEY BRAND, LLP
621 CAPITOL MALL, 18TH FLOOR
SACRAMENTO, CA 95814
FOR: MOUNTAIN UTILITIES

ANDREW B. BROWN
ELLISON, SCHNEIDER & HARRIS LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: SIERRA PACIFIC POWER COMPANY

LYNN M. HAUG
ELLISON, SCHNEIDER & HARRIS LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: FUELCELL ENERGY, INC.

ANN L. TROWBRIDGE
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, SUITE 205
SACRAMENTO, CA 95864
FOR: CALIFORNIA CLEAN DG COALITION

RALPH R. NEVIS
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DR., SUITE 205
SACRAMENTO, CA 95864
FOR: MODESTO IRRIGATION DISTRICT/MERCED
IRRIGATION DISTRICT

DAN SILVERIA
SURPRISE VALLEY ELECTRIC CORPORATION
PO BOX 691
ALTURAS, CA 96101
FOR: SURPRISE VALLEY ELECTRIC CORP.

JESSICA NELSON
ENERGY SERVICES MANAGER
PLUMAS SIERRA RURAL ELECTRIC COOP.
73233 STATE RT 70
PORTOLA, CA 96122-7069
FOR: PLUMAS SIERRA RURAL ELECTRIC COOP.

Information Only

CARLOS LAMAS-BABBINI
COMVERGE, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000

HUGH YAO
SOUTHERN CALIFORNIA GAS COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

TARYN CIARDELLA

MRW & ASSOCIATES, LLC

SR. LEGAL SECRETARY
 NV ENERGY
 EMAIL ONLY
 EMAIL ONLY, NV 00000

EMAIL ONLY
 EMAIL ONLY, CA 00000

ERIN GRIZARD
 THE DEWEY SQUARE GROUP
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000

CHRISTOPHER A. HILEN
 NV ENERGY
 6100 NEIL ROAD, MS A35
 RENO, NV 89511
 FOR: SIERRA PACIFIC POWER COMPANY

DEAN A. KINPORTS
 REGULATORY AFFAIRS
 SAN DIEGO GAS AND ELECTRIC COMPANY
 555 W. FIFTH STREET
 LOS ANGELES, CA 90013

GREGORY S.G. KLATT
 DOUGLASS & LIDDELL
 411 E. HUNTINGTON DRIVE, SUITE 107-356
 ARCADIA, CA 91006-8102
 FOR: DIRECT ACCESS CUSTOMER COALITION

STEVE ENDO
 PASADENA DEPARTMENT OF WATER & POWER
 150 S. LOS ROBLES AVE., STE. 200
 PASADENA, CA 91101

AKBAR JAZAYEIRI
 DIR. REVENUE & TARIFFS, RM 390
 SOUTHERN CALIFORNIA EDISON COMPANY
 PO BOX 800, 2241 WALNUT GROVE AVE
 ROSEMEAD, CA 91770
 FOR: SOUTHERN CALIFORNIA EDISON CO.

AMBER E. WYATT
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVENUE
 ROSEMEAD, CA 91770

CASE ADMINISTRATION
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVE., RM. 370
 ROSEMEAD, CA 91770

LAURA GENAO
 RENEWABLE & ALTERNATIVE POWER
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVE.
 ROSEMEAD, CA 91770

MARCI BURGDORF
 RENEWABLE & ALTERNATIVE POWER
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVE.
 ROSEMEAD, CA 91770

MICHAEL D. MONTOYA
 ATTORNEY AT LAW
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVENUE, PO BOX 800
 ROSEMEAD, CA 91770

JEFF COX
 FUELCELL ENERGY
 1557 MANDEVILLE PLACE
 ESCONDIDO, CA 92029

BARRY LOVELL
 BERRY PETROLEUM COMPANY
 15708 POMERADO ROAD, SUITE 203
 POWAY, CA 92064

DON LIDDELL
 DOUGLASS & LIDDELL
 2928 2ND AVENUE
 SAN DIEGO, CA 92103

THOMAS R. DEL MONTE
 NU LEAF ENERGY, LLC
 4678 MORRELL STREET
 SAN DIEGO, CA 92109

JON FORTUNE
 PROGRAM MANAGER
 CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
 8690 BALBOA AVE., SUITE 100
 SAN DIEGO, CA 92123

SEPHRA A. NINOW
 CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
 8690 BALBOA AVENUE, SUITE 100
 SAN DIEGO, CA 92123

DESPINA NIEHAUS
 SAN DIEGO GAS & ELECTRIC COMPANY
 8330 CENTURY PARK COURT, CP32D
 SAN DIEGO, CA 92123-1530

STEVE RAHON
 SAN DIEGO GAS & ELECTRIC COMPANY
 8330 CENTURY PARK COURT, CP32C
 SAN DIEGO, CA 92123-1548
 FOR: SAN DIEGO GAS & ELECTRIC CO.

NORA SHERIFF
 ALCANTAR & KAHL, LLP
 33 NEW MONTGOMERY STREET, SUITE 1850
 SAN FRANCISCO, CA 94015

SUE MARA

MANUEL RAMIREZ

RTO ADVISORS, LLC.
164 SPRINGDALE WAY
REDWOOD CITY, CA 94062

SAN FRANCISCO PUC - POWER ENTERPRISE
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103

SANDRA ROVETTI
REGULATORY AFFAIRS MANAGER
SAN FRANCISCO PUC
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103

THERESA BURKE
SAN FRANCISCO PUC
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103

MARCEL HAWIGER
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104

JENNIFER BARNES
NAVIGANT CONSULTING, INC.
1 MARKET ST., SPEAR ST. TWR., STE. 1200
SAN FRANCISCO, CA 94105

JOSEPHINE WU
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

KAREN TERRANOVA
ALCANTAR & KAHL
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105

MARK W. ZIMMERMANN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

SEEMA SRINIVASAN
ALCANTAR & KAHL
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105

TOM JARMAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE SATREET, RM. 909, MC B9A
SAN FRANCISCO, CA 94105-1814

SUSAN BULLER
PACIFIC GAS AND ELECTRIC COMPANY
245 MARKET STREET, RM 966B, MC N9P
SAN FRANCISCO, CA 94106

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

ROBERT GEX
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST., SUITE 303
SAN FRANCISCO, CA 94117-2242

REGULATORY FILE ROOM
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120

EVELYN C. LEE
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442, MC-B30A
SAN FRANCISCO, CA 94120-7442

ED LUCHA
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177

BETH VAUGHAN
CALIFORNIA COGENERATION COUNCIL
4391 NORTH MARSH ELDER CT.
CONCORD, CA 94521

JOHN DUTCHER
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD, CA 94534-7875

SEAN BEATTY
SR. MGR. EXTERNAL & REGULATORY AFFAIRS
MIRANT CALIFORNIA, LLC
696 WEST 10TH STREET
PITTSBURG, CA 94565

TIMEA ZENTAI
NAVIGANT CONSULTING
1990 NORTH CALIFORNIA AVE., SUITE 700
WALNUT CREEK, CA 94596

JODY S. LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND, CA 94609

BARRY F. MCCARTHY
ATTORNEY AT LAW
MCCARTHY & BERLIN, LLP
100 W. SAN FERNANDO ST., SUITE 501
SAN JOSE, CA 95113

C. SUSIE BERLIN

JOY A. WARREN

ATTORNEY AT LAW
MCCARTHY & BERLIN LLP
100 W. SAN FERNANDO ST., SUITE 501
SAN JOSE, CA 95113

MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

ROGER VAN HOY
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
FOR: MODESTO IRRIGATION DISTRICT

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460

DOUGLAS M. GRANDY, P.E.
CALIFORNIA ONSITE GENERATION
DG TECHNOLOGIES
1220 MACAULAY CIRCLE
CARMICHAEL, CA 95608

DAVID E. MORSE
1411 W. COVELL BLVD., STE. 106-292
DAVIS, CA 95616-5934

WAYNE AMER
PRESIDENT
MOUNTAIN UTILITIES (906)
PO BOX 205
KIRKWOOD, CA 95646

DENNIS W. DECUIR
A LAW CORPORATION
2999 DOUGLAS BOULEVARD, SUITE 325
ROSEVILLE, CA 95661

GARY COLLORD
STATIONARY SOURCE DIVISION
CALIFORNIA AIR RESOURCES BOARD
1001 I STREET, PO BOX 2815
SACRAMENTO, CA 95812

BLAIR KNOX
CALIFORNIA INDEPENDENT PETROLEUM ASSOC.
1112 I STREET
SACRAMENTO, CA 95814
FOR: CIPA

KEITH RODERICK
CALIFORNIA AIR RESOURCES BOARD
1001 I STREET
SACRAMENTO, CA 95814

MICHELLE GARCIA
CALIFORNIA AIR RESOURCES BOARD
1001 I STREET
SACRAMENTO, CA 95814

NORMAN PLOTKIN
PLOTKIN, ZINS & ASSOCIATES
925 L STREET, SUITE 1490
SACRAMENTO, CA 95814

SCOTT BLAISING
BRAUN BLAISING MCLAUGHLIN P.C.
915 L STREET, STE. 1270
SACRAMENTO, CA 95814

JEDEDIAH J. GIBSON
ATTORNEY
ELLISON, SCHNEIDER & HARRIS LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, STE 112, PMB 119
ANTELOPE, CA 95843
FOR: CALIFORNIA ONSITE GENERATION

MARK TUCKER
PACIFICORP
825 NE MULTNOMAH, SUITE 2000
PORTLAND, OR 97232

DONALD SCHOENBECK
RCS, INC.
900 WASHINGTON STREET, SUITE 780
VANCOUVER, WA 98660

State Service

AMY C. YIP-KIKUGAWA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 2106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BURTON MATTSON
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CANDACE MOREY
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION

CHLOE LUKINS
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH

ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CURTIS SEYMOUR
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DAVID PECK
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4103
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DOROTHY DUDA
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5109
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ELIZABETH STOLTZFUS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HARVEY Y. MORRIS
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5036
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JENNIFER KALAFUT
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KARIN M. HIETA
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: ENERGY DIVISION

MARSHAL B. ENDERBY
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

MICHAEL COLVIN
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RAHMON MOMOH
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

THOMAS ROBERTS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TRACI BONE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5031
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LINDA KELLY
ELECTRICITY ANALYSIS OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 20
SACRAMENTO, CA 95814
FOR: CALIFORNIA ENERGY COMMISSION

GALEN LEMEI
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO, CA 95814-5512

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