

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider
Program Refinements, and Establish Annual
Local Procurement Obligations

R.09-10-032
(Filed October 29, 2009)

**COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) ON
PROPOSED DECISION ADOPTING LOCAL PROCUREMENT OBLIGATIONS FOR
2011 AND FURTHER REFINING THE RESOURCE ADEQUACY PROGRAM**

Don Garber
101 Ash Street, HQ 12
San Diego, California 92101-3017
Telephone: (619) 696-4539
Facsimile: (619) 699-5027
E-mail: dgarber@sempra.com

Attorney for
San Diego Gas & Electric Company

June 14, 2010

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OF THE STATE OF CALIFORNIA**

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In accordance with Rule 14 of the Commission's Rules of Practice and Procedure, San Diego Gas & Electric Company (SDG&E) submits its comments on the May 25, 2010 proposed decision (PD) of Administrative Law Judge David Gamson in Phase 1 of this proceeding. The PD establishes local procurement obligations for 2011 and adopts several refinements and clarifications to the current Resource Adequacy (RA) program. SDG&E supports the local procurement targets established for 2011, and generally finds the remainder of the PD to be well-reasoned even though it does not always adopt the positions that SDG&E supported. As discussed below, SDG&E particularly appreciates the PD's clarification that resources connected at the distribution level can be counted for RA if the distribution system owner finds that the resources are deliverable.¹

¹ PD at 30-32, referencing the Energy Division staff's Qualifying Capacity Methodology Manual (Appendix B) at 6-7.

I. Generation Resources Interconnected to the Distribution System Can Qualify for RA Credit If the Distribution System Owner Finds that the Resources Are Deliverable.

In the workshops and subsequent comments, SDG&E took the position that generators interconnected to SDG&E's distribution system should be "deemed" deliverable so that the associated qualified capacity (QC) can be counted towards meeting SDG&E's RA requirements. The PD finds that "the record of this proceeding does not identify a specific class of distribution level resources that may not be currently counted as either demand reductions or as supply."² The PD notes that Section 4 of the staff's QC Report states that it is up to the owner of the distribution system to determine whether such generators are deliverable up to 100% of their qualified capacity rating.³ SDG&E supports the analysis set forth in the PD and finds the reasoning directly applicable to several generation resources under its control.

For example, SDG&E has a Commission-approved contract of aggregated back-up generation (BUG) resources commonly referred to as the Celerity I resources. The Celerity I contract is comprised of 15 separate customer-owned diesel generators, typically located inside commercial and institutional establishments in San Diego County. Each resource is interconnected to SDG&E's distribution system, and is generally designed to serve that location's on-site load in the event of an emergency. The underlying resources range in size from 141 kW to 1.925 MW, and collectively provide 25.34 MW of capacity. SDG&E has the right to dispatch the Celerity I resources during Stage 2 emergencies, during a Stage 1 alert if SDG&E anticipates a Stage 2 emergency may be called later that day, or during certain high price circumstances. When dispatched, the resources serve their location's load, thereby

² PD at 31.

³ Energy Division staff's Qualifying Capacity Methodology Manual (December 2009) at 6-7, attached to PD as Appendix B.

reducing total load on the distribution system. In some locations, the amount of generation produced may exceed the on-site load, allowing some excess energy to serve additional load on the distribution system.

The Celerity I resources were interconnected pursuant to Commission Rule 21, not the CAISO's rules governing interconnections to the transmission system. The transmission system has a *loop* configuration that presents the opportunity for congestion to develop depending upon total injections and withdrawals to and from the system. Consequently, for transmission-interconnected resources the CAISO performs deliverability studies to ensure that transmission congestion is unlikely to keep a RA resource from serving load during peak load hours. Under the CAISO's tariff and interconnection procedures, a deliverability assessment is required before a resource connected at the transmission level can become eligible to supply RA.

Conversely, SDG&E's distribution system, composed of relatively small voltage lines below 69-KV, has a *radial* configuration that is protected from the effects of loop flow. As long as the generating units interconnected to a given distribution circuit, collectively, do not exceed the electrical capabilities of that circuit, then the units can be dispatched to serve load. The first load served would be any on-site demand, with any excess energy electrically flowing to other SDG&E load.

Under these circumstances, and as confirmed by the PD, there is simply no need for the CAISO to perform a deliverability analysis. The CAISO manages electrical flows on the *looped* transmission system; SDG&E manages flows on its *radial* distribution system. With respect to the example under discussion, SDG&E performed an analysis to ensure that the size and placement of the Celerity I units on the distribution system would not exceed the limitations of

the distribution circuits affected.⁴ The units are enmeshed deeply in SDG&E's load circuits and thus have *deliverability* characteristics seldom, if ever, achieved by other supply resources serving SDG&E's load at the transmission level.

The CAISO is holding stakeholder discussions in order to ascertain how its process for interconnecting large and small generator interconnections to the looped transmission system can be improved. In particular, the CAISO is trying to streamline the process to reduce the current backlog of interconnection studies, including deliverability studies. SDG&E is participating in this discussion and supports the CAISO's objectives. But the reforms that are expected to emerge from that effort are not needed, or even relevant, to certifying the deliverability status of the small generating units under discussion here. Furthermore, the CAISO process, should it even attempt to address the distribution interconnection issues, would unnecessarily cause a significant delay in counting these resources towards meeting the RA requirements.⁵ SDG&E is fully capable of performing distribution level interconnection studies pursuant to Commission rules and procedures. There is simply no rhyme or reason to require a FERC-based CAISO deliverability analysis for small generators enmeshed in SDG&E's distribution system.

SDG&E appreciates the PD's clarification that distribution level resources are RA eligible up to 100% of their QC, and that this eligibility is based on deliverability assessments performed by the distribution system owner, not the CAISO. Based on this clarification,

⁴ SDG&E's Protection Engineering and Distribution Planning groups analyzed each of the 15 Celerity I generating units and determined that each unit could operate without adversely affecting the distribution system.

⁵ Further delay in counting the Celerity resources for RA would drive-up SDG&E's cost of procuring local RA capacity by approximately \$1,000,000 per year.

SDG&E believes that resources as described above are eligible to provide RA capacity, and looks forward to working with the Energy Division to count these resources towards its 2011 Local RA requirements.

Respectfully submitted,

/s/ DON GARBER

Don Garber
101 Ash Street, HQ 12
San Diego, California 92101-3017
Telephone: (619) 696-4539
Facsimile: (619) 699-5027
E-mail: dgarber@sempra.com

Attorney for
San Diego Gas & Electric Company

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CERTIFICATE OF SERVICE

I hereby certify that a copy of **COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) ON PROPOSED DECISION ADOPTING LOCAL PROCUREMENT OBLIGATIONS FOR 2011 AND FURTHER REFINING THE RESOURCE ADEQUACY PROGRAM** has been electronically mailed to each party of record of the service list in R.09-10-032. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Administrative Law Judge the Commissioner in this proceeding.

Executed this 14th day of June, 2010 at San Diego, California.

/s/ LISA FUCCI-ORTIZ

Lisa Fucci-Ortiz



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Parties

ABRAHAM SILVERMAN
 SR. COUNSEL, REGULATORY
 NRG ENERGY, INC.
 211 CARNEGIE CENTER DRIVE
 PRINCETON, NJ 08540
 FOR: NRG: NRG POWER MRKTNG LLC,
 CABRILLO POWER I LLC, CABRILLO POWER II
 LLC, EL SEGUNDO POWER LLC, LONG BEACH
 GENERATION LLC

JASON A. LEWIS
 VP, ASSIST GENERAL COUNSEL
 JPMORGAN CHASE BANK, N.A.
 245 PARK AVENUE 11TH FLOOR
 NEW YORK, NY 10167
 FOR: JPMORGAN CHASE BANK, N.A.

KEITH MCCREA
 ATTORNEY AT LAW
 SUTHERLAND ASHILL & BRENNAN
 1275 PENNSYLVANIA AVENUE NW
 WASHINGTON, DC 20004-2415
 FOR: CALIFORNIA MANUFACTURERS &
 TECHNOLOGY ASSOCIATION

MICHAEL A. YUFFEE
 MCDERMOTT WILL & EMERY LLP
 600 THIRTEENTH STREET, N.W.
 WASHINGTON, DC 20005-3096
 FOR: MORGAN STANLEY CAPITAL GROUP, INC.

JOSEPH M. PAUL
 SR. CORPORATE COUNSEL
 DYNEGY INC.
 1000 LOUISIANA, STE. 5800
 HOUSTON, TX 77002
 FOR: DYNEGY MORRO BAY, LLC, DYNEGY MOSS
 LANDING, LLC, DYNEGY OAKLAND, LLC AND
 DYNEGY SOUTH BAY, LLC

DANIEL W. DOUGLASS
 ATTORNEY AT LAW
 DOUGLASS & LIDDELL
 21700 OXNARD STREET, SUITE 1030
 WOODLAND HILLS, CA 91367-8102
 FOR: SEMPRA ENERGY/ALLIANCE FOR RETAIL
 ENERGY MARKETS/WESTERN POWER TRADING
 FORUM

ANNETTE GILLIAM
 ATTORNEY AT LAW
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVENUE
 ROSEMEAD, CA 91770
 FOR: SOUTHERN CALIFORNIA EDISON COMPANY

WILLIAM V. WALSH
 ATTORNEY AT LAW
 SOUTHERN CALIFORNIA EDISON COMPANY
 2244 WALNUT GROVE AVE.
 ROSEMEAD, CA 91770
 FOR: SOUTHERN CALIFORNIA EDISON COMPANY

DONALD P. GARBER
 SEMPRA ENERGY
 101 ASH STREET

GREG BASS
 SEMPRA ENERGY SOLUTIONS LLC
 401 WEST A STREET, SUITE 500

SAN DIEGO, CA 92101
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

SAN DIEGO, CA 92101
FOR: SEMPRA ENERGY SOLUTIONS LLC

THOMAS CORR
SEMPRA GLOBAL
101 ASH STREET, HQ 08 C
SAN DIEGO, CA 92101-3017
FOR: SEMPRA GENERATION

MARCIE A. MILNER
(1374)
SHELL ENERGY NORTH AMERICA (US), L.P.
4445 EASTGATE MALL, STE. 100
SAN DIEGO, CA 92121
FOR: SHELL ENERGY NORTH AMERICA (US) LP

MONA TIERNEY-LLOYD
SENIOR MANAGER WESTERN REG. AFFAIRS
ENERNOC, INC.
PO BOX 378
CAYUCOS, CA 93430
FOR: ENERNOC, INC.

CHARLYN A. HOOK
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

MICHEL PETER FLORIO
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: THE UTILITY REFORM NETWORK

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105
FOR: ENERGY PRODUCERS & USERS COALITION

MARK R. HUFFMAN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET / PO BOX 7442 (B30A)
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

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: INDEPENDENT ENERGY PRODUCERS ASSOCIATION

MARLO A. GO
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: NORTH AMERICA POWER PARTNERS

LISA A. COTTLE
WINSTON & STRAWN LLP
101 CALIFORNIA STREET, 39TH FLOOR
SAN FRANCISCO, CA 94114
FOR: MIRANT CALIFORNIA, LLC/MIRANT DELTA, LLC

SARA STECK MYERS
ATTORNEY AT LAW
122 28TH AVENUE
SAN FRANCISCO, CA 94121
FOR: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES/ENERNOC, INC.

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

CRAIG MARTIN
CALPINE POWERAMERICA - CA, LLC
4160 DUBLIN BLVD., SUITE 100
DUBLIN, CA 94568
FOR: CALPINE CORPORATIONS

MATHEW BARMACK
CALPINE CORPORATION
4160 CUBLIN BLVD., SUITE 100
DUBLIN, CA 94568
FOR: CALPINE CORPORATION

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICES OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA, CA 94596
FOR: CALIFORNIA LARGE ENERGY CONSUMERS ASSOCIATION

THOMAS BEACH
CROSSBORDER ENERGY
2560 9TH ST., SUITE 213A
BERKELEY, CA 94710-2557
FOR: CROSSBORDER ENERGY/CAL WEA/CALIFORNIA COGENERATION COUNCIL

ANTHONY J. IVANCOVICH
ASST. GENERAL COUNSEL - REGULATORY
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES

ANDREW B. BROWN
ELLISON SCHNEIDER & HARRIS, L.L.P.

ENERGY USERS FORUM
2602 CELEBRATION WAY
WOODLAND, CA 95776
FOR: ENERGY USERS FORUM

2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: SIERRA PACIFIC POWER CO.

Information Only

BRAD WETSTONE
EMAIL ONLY
EMAIL ONLY, CA 00000

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

KEVIN WOODRUFF
EMAIL ONLY
EMAIL ONLY, CA 00000

EMAIL ONLY
EMAIL ONLY
EMAIL ONLY, CA 00000

EMAIL ONLY
EMAIL ONLY
EMAIL ONLY, CA 00000

MRW & ASSOCIATES, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

ARTHUR HAUBENSTOCK
BRIGHTSOURCE ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

DOUGLAS DAVIE
WELLHEAD ELECTRIC
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

CHRISTOPHER C. O'HARA
ASSISTANT GENERAL COUNSEL-REGULATORY
NRG ENERGY
211 CARNEGIE CENTER DRIVE
PRINCETON, NJ 08540

TOD O'CONNOR
NRG ENERGY, INC.
211 CARNEGIE CENTER
PRINCETON, NJ 08835

JOE GORBERG
LS POWER GENCO, LLC
1700 BROADWAY, 35TH FLOOR
NEW YORK, NY 10019

STEVEN HUHMAN
MORGAN STANLEY CAPITAL GROUP INC.
2000 WESTCHESTER AVENUE
PURCHASE, NY 10577

MELISSA R. DORN
MCDERMOTT WILL & EMERY
600 THIRTEENTH STREET, N.W.
WASHINGTON, DC 20005

VICTORIA LAUTERBACH
MCDERMOTT WILL & EMERY LLP
600 13TH STREET, NW
WASHINGTON, DC 20005
FOR: MORGAN STANLEY CAPITAL GROUP INC.

JAMES ROSS
RCS, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD, MO 63017

GRETCHEN SCHOTT
SENIOR COUNSEL
RRI ENERGY, INC
1000 MAIN STREET
HOUSTON, TX 77002

TRENT CARLSON
VP, REGULATORY AFFAIRS
RRI ENERGY, INC
1000 MAIN STREET
HOUSTON, TX 77002

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVENUE
DURANGO, CO 81301

FRED MOBASHERI
CONSULTANT
ELECTRIC POWER GROUP, LLC
201 SOUTH LAKE AVE., SUITE 400
PASADENA, CA 91101

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

GINA M. DIXON
SOUTHERN CALIFORNIA EDISON
MAIL STOP: GO-1C 162P
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

JENNA TREBS
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

DANIEL A. KING
SEMPRA GENERATION
101 ASH STREET, HQ 14
SAN DIEGO, CA 92101

JOHN W. LESLIE, ESQ.
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
600 WEST BROADWAY, STE. 2600
SAN DIEGO, CA 92101

DONALD C. LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103

MICHAEL D. EVANS
SHELL ENERGY AMERICA (US) L.P.
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA 92120

NUO TANG
SAN DIEGO GAS & ELECTRIC
8315 CENTURY PARK COURT, CP21D
SAN DIEGO, CA 92123

RANDY NICHOLSON
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP32H
SAN DIEGO, CA 92123

TRACEY L. DRABANT
ENERGY RESOURCE MANAGER
BEAR VALLEY ELECTRIC SERVICE
PO BOX 1547
BIG BEAR LAKE, CA 92315

STEPHEN HESS
DIRECTOR, MARKET POLICY & REG. AFFAIRS
EDISON MISSION MARKETING & TRADING INC.
18101 VON KARMAN AVE, STE. 1700
IRVINE, CA 92612-1046

INGER GOODMAN
COMMERCE ENERGY INC
575 ANTON BLVD., SUITE 650
COSTA MESA, CA 92626

MARK FRAZEE
PRINCIPAL INTEG. RES. PLANNER
CITY OF ANAHEIM PUBLIC UTILITIES DEPT.
201 S. ANAHEIM BLVD., SUITE 802
ANAHEIM, CA 92805

SUE MARA
RTO ADVISORS, LLC
164 SPRINGDALE WAY
REDWOOD CITY, CA 94062

MARC D. JOSEPH
ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD. STE 1000
SOUTH SAN FRANCISCO, CA 94080

JAMES HENDRY
UTILITIES SPECIALIST
SAN FRANCISCO PUBLIC UTILITIES COMM.
1155 MARKET STREET, FOURTH FLOOR
SAN FRANCISCO, CA 94103

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

RICK COUNIHAN
ENERNOC, INC.
500 HOWARD STREET, SUITE 400
SAN FRANCISCO, CA 94105

ROGER GOLDSTEIN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

TIM LINDL
ALCANTAR & KAHL
33 NEW MONTGOMERY ST., STE. 1850
SAN FRANCISCO, CA 94105

WILL MITCHELL
COMPETITIVE POWER VENTURES, INC.
55 2ND STREET, SUITE 525
SAN FRANCISCO, CA 94105

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

THOMAS W. SOLOMON
ATTORNEY AT LAW
WINSTON & STRAWN LLP
101 CALIFORNIA STREET, 39TH FLOOR
SAN FRANCISCO, CA 94111-5894

IRENE K. MOOSEN
ATTORNEY AT LAW
CITY AND COUNTY OF SAN FRANCISCO
53 SANTA YNEZ AVE.
SAN FRANCISCO, CA 94112

DIANE I. FELLMAN
DIRECTOR, REGULATORY & MARKET AFFAIRS
NRG WEST
73 DOWNEY STREET
SAN FRANCISCO, CA 94117

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

ALICE L. REID
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC CO.
PO BOX 7442
SAN FRANCISCO, CA 94120

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000; MC B9A
SAN FRANCISCO, CA 94177

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

GRACE LIVINGSTON-NUNLEY
ASSISTANT PROJECT MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177

SEBASTIEN CSAPO
PG&E PROJECT MGR.
MAIL CODE B9A
PO BOX 770000
SAN FRANCISCO, CA 94177

ED CHANG
FLYNN RESOURCE CONSULTANTS INC.
5440 EDGEVIEW DRIVE
DISCOVERY BAY, CA 94514

KERRY HATTEVIK
NEXTERA ENERGY
829 ARLINGTON BLVD.
EL CERRITO, CA 94530

SEAN P. BEATTY
MIRANT CALIFORNIA, LLC
PO BOX 192
PITTSBURGH, CA 94565

JEANNE MCKINNEY
CALPINE CORPORATION
4160 DUBLIN BLVD., SUITE 100
DUBLIN, CA 94568

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

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

MICHAEL G. NELSON, ESQ.
MACCARTHY & BERLIN, LLP
100 W. SAN FERNANDO STREET, SUITE 501
SAN JOSE, CA 95113

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

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

ERIC LEUZE
RRI ENERGY, INC
4174 RIVA RIDGE DRIVE
FAIR OAKS, CA 95628

BETH ANN BURNS
SR. COUNSEL - LEGAL & REGULATORY DEPT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION

CYNTHIA HINMAN
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA ISO

KEITH JOHNSON
SENIOR MARKET&PRODUCT DEVELOPER
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

MELANIE GILLETTE
SR MGR WESTERN REG. AFFAIRS
ENERNOC, INC.
115 HAZELMERE DRIVE
FOLSOM, CA 95630

SAEED FARROKHPAY
FEDERAL ENERGY REGULATORY COMMISSION
110 BLUE RAVINE ROAD, SUITE 107
FOLSOM, CA 95630

WADE MCCARTNEY
SR. MARKET DESIGN & POLICY SPECIALIST
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

CALIFORNIA ISO
LEGAL & REGULATORY DEPT.
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

STEPHEN GREENLEAF
VP, COMPLIANCE DIRECTOR
JPMORGAN CHASE BANK, N.A.
2864 ABERDEEN LANE
EL DORADO HILLS, CA 95762

BRIAN THEAKER
DIR., REGULATORY RELATIONS
DYNEGY, INC.
980 9TH STREET, SUITE 2130
SACRAMENTO, CA 95814

DARYL METZ
CALIFORNIA ENERGY COMMISSION
1516 9TH ST., MS-23
SACRAMENTO, CA 95814

MIKE JASKE
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-20
SACRAMENTO, CA 95814

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

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSOCIATION
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814

JIM WOODWARD
ELECTRICITY SUPPLY ANALYSIS DIVISION
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 20
SACRAMENTO, CA 95814-5512

SAMANTHA G. POTTENGER
ELLISON, SCHNEIDER AND HARRIS L.L.P.
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816

JEDEDIAH GIBSON
ATTORNEY AT LAW
ELLISON SCHNEIDER & HARRIS
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905

State Service

CHLOE LUKINS
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DAVID M. GAMSON
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5019
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DONALD J. BROOKS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ELIZABETH DORMAN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

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

KEVIN R. DUDNEY
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LANA TRAN
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC GENERATION PERFORMANCE BRANCH
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARY JO STUEVE
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PEJMAN MOSHFEGH
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PETER SPENCER
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LYNN MARSHALL
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-20
SACRAMENTO, CA 95814-5512

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