



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE **FILED**

STATE OF CALIFORNIA

07-07-10

04:59 PM

Order Instituting Rulemaking on the  
Commission's Own Motion to Address the Issue  
of Customers' Electric and Natural Gas Service  
Disconnection.

Rulemaking 10-02-005  
(Filed February 4, 2010)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) OPENING COMMENTS**  
**TO THE INTERIM DECISION IMPLEMENTING METHODS TO DECREASE THE**  
**NUMBER OF GAS AND ELECTRIC UTILITY SERVICE DISCONNECTIONS**

JENNIFER TSAO SHIGEKAWA  
MONICA GHATTAS

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-3623  
Facsimile: (626) 302-1910  
E-mail: [monica.ghattas@sce.com](mailto:monica.ghattas@sce.com)

Dated: **July 7, 2010**

## Table Of Contents

Section	Page
I. INTRODUCTION.....	1
II. DISCUSSION .....	1
A.    SCE’s Existing Policies and Procedures for Special Needs Customers Provide the Necessary Precautions for Health and Safety.....	3
1.    SCE Currently Conducts In-Person Visits for Disabled and Critical Care Customers Prior to Disconnection.....	3
2.    SCE Can Provide Means for FSRs to Collect Bill Payments from Disabled and Critical Care Customers but Expanding this Measure to All Customers who Receive a Medical Baseline Allocation Will Be Costly for Ratepayers and Is Unnecessary .....	4
B.    Many of the Proposed Deposit and Collection Measures Will Be Costly and Take Additional Time to Implement.....	7
1.    SCE Can Support Direct Pay as an Alternative to Cash Deposits But it Will Result in Significant Increased Cost to Ratepayers.....	7
2.    Costs to Implement the Waiver of Reestablishment of Credit Deposits for CARE Customers Will Be Significant.....	8
3.    SCE is Prepared to Immediately Limit Reestablishment of Credit Deposits to Two Times the Average Monthly Bill.....	8
C.    Additional Clarification to Uniform Notice of Disconnection Procedures and Reporting Requirements Is Needed .....	9
1.    Uniform Notice of Disconnection Procedures Are Not Necessary .....	9
2.    Proposed Clarifications and Additions to New Reporting Requirements .....	10
D.    Clarification Regarding SCE’s Current and Future Planned Use of In- Language Communications .....	11
III. CONCLUSION.....	12
APPENDIX A RECOMMENDED CHANGES TO THE PROPOSED DECISION .....	13

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

Order Instituting Rulemaking on the  
Commission's Own Motion to Address the Issue  
of Customers' Electric and Natural Gas Service  
Disconnection.

Rulemaking 10-02-005  
(Filed February 4, 2010)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) OPENING COMMENTS  
TO THE INTERIM DECISION IMPLEMENTING METHODS TO DECREASE THE  
NUMBER OF GAS AND ELECTRIC UTILITY SERVICE DISCONNECTIONS**

**I.**

**INTRODUCTION**

Pursuant to Rule 14.3(a) of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) comments on the proposed decision of Commissioner Grueneich, *Interim Decision Implementing Methods to Decrease the Number of Gas and Electric Utility Service Disconnections*, dated June 17, 2010 (the "PD").

**II.**

**DISCUSSION**

SCE supports, with a few necessary modifications, the PD and the adopted interim measures. The PD correctly recognizes that there will be costs associated with implementing the measures and appropriately provides that the utility costs related to these measures shall be recorded in the memorandum account created by Rulemaking (R.)10-02-005 for cost recovery. Some of the measures identified in the PD, however, will have significant cost implications that

may outweigh their potential benefits. Moreover, some measures outlined in the PD require some clarification. In these comments, SCE will address the following issues:

- SCE currently designates certain customers as critical care, based on a confirmation that disconnection could result in a risk to health and safety. SCE visits these customers prior to disconnection.
- SCE Field Services Representatives (“FSRs”) can offer disabled and critical care customers multiple options to pay their bill in the field. For employee safety reasons, however, FSRs should not collect money in the field. In addition, it is unnecessary to expand this field payment option to all customers who receive a Medical Baseline allocation because customers whose health or safety is at risk are covered by SCE’s critical care designation and there is a substantial cost to expand this service to all customers receiving a Medical Baseline allocation.
- SCE can support the use of Direct Pay as an alternative to charging a cash deposit; however, the cost of implementing a waiver of deposits for all customers who participate in Direct Pay is significant.
- SCE can implement, by October 1, 2010, the process of waiving, through January 1, 2012, CARE re-establishment deposits following disconnection; however, costs will be significant and an interim manual process will be necessary.
- SCE can immediately change reestablishment of credit deposits for non-CARE customers to twice the average monthly bill.
- SCE seeks Commission clarification regarding how the Investor Owned Utilities (“IOUs”) should work toward uniform notice of disconnection procedures. Most, if not all, options will have significant system implementation costs and further consideration should be given to whether uniform procedures will result in sufficient benefits, in light of such costs. It may also take over 18 months to make the system changes necessary to support any procedural changes.

- SCE agrees that reporting is necessary to ensure the measures mandated by the Commission are working; however, SCE suggests certain modifications and additions that would clarify and simplify the reporting process.
- SCE clarifies its current use of in-language communication.

**A. SCE’s Existing Policies and Procedures for Special Needs Customers Provide the Necessary Precautions for Health and Safety**

SCE has enhanced collections and disconnection policies and procedures for its special needs customers. The special needs customer group includes disabled and critical care customers for whom SCE takes additional health and safety precautions prior to disconnecting electric service. Critical care customers are those customers who have indicated, in the process of applying for a Medical Baseline allocation, that they would suffer a risk to health and safety if left without electricity for two hours or less.<sup>1</sup> Expanding this treatment to include all customers receiving a Medical Baseline allocation will be costly for ratepayers without achieving notable advantages in health and safety.

**1. SCE Currently Conducts In-Person Visits for Disabled and Critical Care Customers Prior to Disconnection**

Ordering Paragraph (“O.P.”) 2.b. requires that “No customer who is disabled or otherwise presents evidence that a disconnection would create a safety or health risk shall be disconnected without an in-person visit from a utility representative.” SCE understands the need to contact critical care customers prior to disconnection to ensure that the situation is safe for disconnection and to ensure that the customer received notice that he/she will be disconnected. Figure 1 is a flowchart that depicts the credit and collections process flow for disabled and critical care customers. Consequently, SCE’s existing credit and collections policies comply with Ordering Paragraph 2.b.

---

<sup>1</sup> The need for a critical care designation must be certified by a doctor.

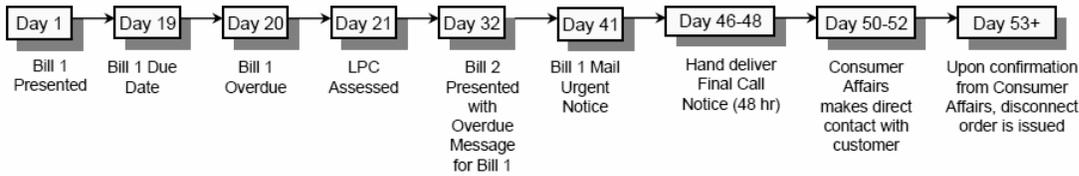


Figure 1 - SCE Collections & Disconnection Path for Disabled and Critical Care Customers

SCE notes that its process includes two in-person visits to a disabled or critical care customer prior to disconnection. The first in-person visit is the delivery of the Final Call Notice (Day 46-48 in Fig. 1). A FSR delivers the notice in person, and if nobody is home he/she will leave the notice with a door hanger. Next, Consumer Affairs makes three attempts to directly contact the customer by telephone (Day 50-52 in Fig. 1). If Consumer Affairs is unable to make direct contact with a customer, the customer will not be disconnected. If, on the other hand, Consumer Affairs does make contact with the customer and determines that a disconnection is warranted, a FSR is dispatched to the residence. If the FSR arrives at the residence and is unable to make direct contact with the customer or makes contact and determines that disconnecting the customer will result in a risk to health or safety, he/she does not disconnect. Only if the FSR makes contact and determines that there is no health and safety risk to the customer does SCE disconnect a disabled or critical care customer.

**2. SCE Can Provide Means for FSRs to Collect Bill Payments from Disabled and Critical Care Customers but Expanding this Measure to All Customers who Receive a Medical Baseline Allocation Will Be Costly for Ratepayers and Is Unnecessary**

The PD also directs the IOUs to provide a field representative to take payment prior to disconnection from customers who receive a Medical Baseline allocation, are on life-support, or are disabled.<sup>2</sup> As discussed above, SCE currently visits disabled and critical care<sup>3</sup> customers

<sup>2</sup> PD, O.P. 11.

<sup>3</sup> The critical care designation is equivalent to a designation that the individual requires life-support equipment.

prior to disconnection and at modest incremental costs, can collect from them in the manner described below. This requirement, however, will yield significant costs if SCE is required to expand its policies and procedures to include all customers receiving a Medical Baseline allocation.

The Medical Baseline allocation was established by statute in 1982 for customers with certain disabilities or diseases who use a medical device that require increased quantities of electricity.<sup>4</sup> The allocation grants these customers with increased kilowatt hour usage at the lower baseline rate in order to provide them with more affordable electric bills.<sup>5</sup> It was not intended as a measure to identify customers who require added safety precautions.<sup>6</sup> In order to receive the Medical Baseline allocation, a customer's doctor must certify that the customer has one of the qualifying diseases and/or needs a qualifying life support or mobility device. SCE currently has approximately 60,000 customers receiving a Medical Baseline allocation. SCE's critical care designation appropriately identifies those customers receiving a Medical Baseline allocation who also require additional health and safety precautions prior to disconnection. To expand SCE's process to include an in-person visit to, and offer payment options to, *all* customers receiving a Medical Baseline allocation prior to disconnect will cost approximately \$400,000 annually in additional credit and field personnel.<sup>7</sup>

The PD states that “[u]tilities may determine how to implement this practice most efficiently.”<sup>8</sup> The most efficient way for SCE to implement this practice is to continue to provide an in-person visit to disabled and critical care customers and offer to allow them to avoid disconnection by making payment through one of several methods. The FSR can provide information to the customer on how to make payment over the phone or via the web.

---

<sup>4</sup> Cal. PUC § 739(c) (first enacted through AB 2443 (Statutes of 1982, Chapter 1541) and subsequently amended in 1988, 1989 and 1995).

<sup>5</sup> See generally Decision 84-01-064, dated January 19, 1984.

<sup>6</sup> Cal. PUC § 739(d)(2).

<sup>7</sup> Additional field personnel will be needed to perform these in-person visits and additional credit personnel will be needed to track all customers receiving a Medical Baseline allocation and remove them from the general collection path for this alternative treatment.

<sup>8</sup> PD, p. 20.

Alternatively, the FSR can take the customer's payment information and call a payment in directly to SCE on behalf of the customer. The FSR can also work with a CSR to arrange a payment plan for the customer, which will also avoid disconnection at that time. Finally, the FSR may grant a one-time extension enabling the customer to make a payment in his/her method of choice and prevent disconnection. The Commission should not require FSRs to accept money because it presents a significant safety risk. SCE's current process with minor modifications can provide disabled and critical care customers multiple methods by which to pay their bill during the field visit and avoid disconnection. Additionally, SCE's recommended approach limits the cost to ratepayers by providing the service to those customers whose health and safety are truly at risk without unnecessarily expanding it to include additional customers.

Ultimately, SCE is able to comply with this measure as requested, if ordered. However, the PD asserts that its intention is to adopt measures with "minimal cost implications."<sup>2</sup> A low-cost option that meets the intent of the Commission to protect customers with health risks is for SCE to continue its current practice of in-field visits to all disabled and critical care customers prior to disconnection by FSRs who can assist the customer in making payment, agreeing to a payment plan, or obtaining an extension. Expanding this process to include all customers receiving a Medical Baseline allocation, which was intended to assist customers with bill affordability, will require SCE to record approximately \$400,000 annually into its memorandum account. That conflicts with the Commission's intent to adopt measures with minimal costs.

---

<sup>2</sup> PD, p. 9.

**B. Many of the Proposed Deposit and Collection Measures Will Be Costly and Take Additional Time to Implement**

**1. SCE Can Support Direct Pay as an Alternative to Cash Deposits But it Will Result in Significant Increased Cost to Ratepayers**

SCE can support the Commission's proposal to offer customers the option to participate in Direct Pay as an alternative to a cash deposit.<sup>10</sup> Currently, SCE allows CSRs to offer this program at their discretion based on an individual customer's situation. SCE can begin offering this service to all new customers and customers needing to reestablish credit following a disconnection by October 1, 2010. Customers participating in Direct Pay in lieu of a deposit will need to remain on the program and in good standing for up to one-year which is similar to the timeframe associated with establishment of credit for a cash deposit.

A customer may enroll in SCE's Direct Pay program via sce.com, through the Call Center, and by requesting Direct Pay on his/her bill stub.<sup>11</sup> At this time, SCE anticipates that it will cost a total of \$180,000 to implement and support this interim measure through the sunset date of January 1, 2012. Customer accounts will have to be monitored on a routine basis because those who cease to participate in the program prior to one year of enrollment or who have a payment returned for insufficient funds will be charged a deposit.

This measure will also impact write-off because the account is left unsecured if a customer who is or was enrolled in Direct Pay defaults or withdraws from the program. For customers in this situation, SCE will attempt to mitigate the write-off by billing the deposit. SCE provides customers approximately 10 days to pay the deposit. If he/she fails to pay the deposit, SCE will have provided that customer 45 days of additional incremental electricity usage prior to disconnection. SCE anticipates that the total impact to write-off resulting from this measure will be at least \$150,000 for 2010 and 2011.

---

<sup>10</sup> PD, O.P. 7.

<sup>11</sup> In order to be eligible for the Direct Pay program, a customer must 1) have an established SCE account, 2) have a checking account, and 3) be current on his/her SCE bill with no arrears pending.

**2. Costs to Implement the Waiver of Reestablishment of Credit Deposits for CARE Customers Will Be Significant**

SCE appreciates the need to assist low income customers in these difficult economic times and can implement the PD's requirement to eliminate reestablishment of credit deposits following disconnection for customers served under its CARE tariff by October 1, 2010.

In February of this year, SCE modified its system to stop charging reestablishment of credit deposits for non-payment as required in R.10-02-005. These modifications discontinued reestablishment of credit deposits following disconnection for all residential customers. Pursuant to this order, SCE would need to further modify its system to waive reestablishment of credit deposits solely for CARE customers. The process of separating CARE customers from non-CARE customers in SCE's system for deposit purposes is complex. SCE will not be able to automate this process until March 2011. To comply with the PD requirement that this measure begin October 1, 2010, SCE will manually administer this process from October 2010 through March 2011. SCE estimates that the cost to implement both the automated process and an interim manual process will cost \$340,000. Additionally, SCE estimates that waiving these deposits for CARE customers will result in increased risk to uncollectible expense of \$1.475 million for 2010-2011.

**3. SCE is Prepared to Immediately Limit Reestablishment of Credit Deposits to Two Times the Average Monthly Bill**

SCE voluntarily agreed to limit its reestablishment of credit deposits for all residential customers to two times the average monthly bill in January 2010. Before SCE completed implementation of this change, the Commission issued R.10-02-005 which halted all reestablishment of credit deposits. SCE continued working on this initiative even though this Rulemaking was issued, and thus is prepared to implement this measure by October 1, 2010. SCE anticipates that this measure will result in an increased incremental risk to uncollectible expense of \$1.58 million for 2010-2011. SCE plans to file a revised tariff sheet indicating this

change to two times the average monthly bill for reestablishment of credit deposits for residential customers along with the January 1, 2012 sunset date for this interim measure.

**C. Additional Clarification to Uniform Notice of Disconnection Procedures and Reporting Requirements Is Needed**

**1. Uniform Notice of Disconnection Procedures Are Not Necessary**

SCE requires further clarification regarding the PD's request that utilities implement uniform notice of disconnection procedures by October 1, 2010. It is unclear from the PD which of the following options, if any, the PD requires the utilities to recommend:

1. A uniform process for credit and collections;
2. Uniform protocols to be followed by each utility prior to disconnecting a customer; or
3. Uniform disconnection notices that fit within each utility's existing credit and collections processes.

SCE notes that each of these three potential interpretations of the PD will result in system modifications which, for SCE, will not be achievable by October 1, 2010. Additionally, while the PD presumes each of the measures ordered are "low cost," achieving uniform notice of disconnection procedures will likely have significant costs for the IOUs. Each IOU has certain aspects of its collections and disconnection processes programmed in to its IT systems. The language and structure of disconnection notices are also programmed into the systems. Requiring any changes to these automated aspects of the collections and disconnection procedures will be costly and likely take over 18 months.

SCE also notes that the likely high cost of achieving uniform notice of disconnection procedures is not worth the expected benefits to customers. Customers are accustomed to receiving several different bills with dissimilar processes from diverse utilities, credit card companies, banks and other companies with whom they do business. Each of these companies generally has a different bill format, different notice procedures, and different collection

practices. It is difficult to determine what benefit customers will gain from a common electric and gas disconnection notice procedure throughout the state. Therefore, SCE does not believe there is a need for uniform notice of disconnect procedures. If the Commission, however, orders the IOUs to implement uniform notice of disconnection procedures, SCE requests the Commission provide further direction to the IOUs that they be required only to reach a consensus regarding uniform language on their notices, to the extent that their existing collection paths allow for similar notices, by October 1, 2010.

## **2. Proposed Clarifications and Additions to New Reporting Requirements**

SCE agrees that added reporting requirements will be helpful in determining whether the measures taken pursuant to R.10-02-005 have been successful. SCE can provide the information in the report as requested with the exception of the data regarding “Payment Plans Extended (Of those Broken).” SCE’s billing system records a broken payment arrangement as a default. When a customer later obtains another extension or payment arrangement after a broken payment arrangement, it is recorded as a new arrangement and is not linked to the original broken payment arrangement.

One aspect of the report may result in confusion. The report includes four categories of customer counts for each data type: CARE, FERA, Medical Baseline, and those customers who are not on any of those programs. Additionally, there is a column for totaling across these categories. Totaling across these four categories will result in double counting of some customers because customers may be on both CARE or FERA and Medical Baseline. Therefore, SCE suggests that the report be clarified to ask for total unique customers and assert whether customers are categorized as either CARE/FERA or Medical Baseline.

SCE also notes that the IOUs are currently providing several similar credit-related monthly data request to different parties including TURN, DRA and the Commission. SCE requests that the Commission require one common data report that can be sent to all requestors. SCE proposes a report that includes all of the data currently sent to TURN and DRA, as well as

the information requested in the new report proposed in the PD including SCE's suggested revisions. SCE further requests that this comprehensive report be due by the 25<sup>th</sup> of each month. If no comprehensive report is adopted by the Commission, SCE requests that the monthly data report required in this PD be due by the 25<sup>th</sup> of each month. This will allow the IOUs to continue using the process they have already established for gathering this data and ensuring its accuracy.

**D. Clarification Regarding SCE's Current and Future Planned Use of In-Language Communications**

SCE recognizes that alternate language services are a scope item for Phase II of the proceeding. SCE seeks to clarify a comment in the PD that relates SCE's current use of in-language communication. In discussing SCE's efforts in 2010 to expand its communications to provide relevant information in a customer's preferred language, the PD states that "[o]nce information is available regarding language preference, SCE provides its future communications in the indicated language."<sup>12</sup> The citation for this comment is SCE's Opening Comments, page 9. In Opening Comments, on page 9, SCE stated "[o]nce information is obtained regarding a customer's language preference, his/her account profile is updated for future communications."<sup>13</sup>

SCE notes that this statement is misinterpreted in the PD. When SCE becomes aware of a customer's language preference, that preference is noted on the customer's profile in SCE's customer information system. Currently, SCE uses language preference information that is captured as one of the data points used in the selection of customer research samples, where SCE seeks to ensure that research takes into account perspectives from customers across the spectrum of socioeconomic backgrounds. Additionally, SCE uses language preference information to deliver key education and outreach messages in promoting SCE programs through workshops and seminars in-language. SCE also plans to leverage the language preference information to

---

<sup>12</sup> PD, pp. 15-16.

<sup>13</sup> SCE Opening Comments, p. 9.

provide targeted, in-language communications to customers in the future, particularly with the deployment of its Customer Relationship Management project in 2012.

**III.**

**CONCLUSION**

SCE appreciates this opportunity to provide these comments, and respectfully requests that the PD be clarified and corrected as set forth herein.

Respectfully submitted,

JENNIFER TSAO SHIGEKAWA  
MONICA GHATTAS

/s/ Monica Ghattas

By: Monica Ghattas

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-3623  
Facsimile: (626) 302-1910  
E-mail: monica.ghattas@sce.com

July 7, 2010

**Appendix A**

**RECOMMENDED CHANGES TO THE PROPOSED DECISION**

## Proposed Findings of Fact, Conclusions of Law and Ordering Paragraphs

### Findings of Fact:

14. Sensitive customers ~~on medical baseline or~~ on life support who have physical limitations are a very small portion of all residential customers.
15. Sensitive customers on life support should have an in-person visit including a field person who could provide options for bill payment ~~an opportunity for bill collection~~ before disconnection.

### Ordering Paragraphs:

2. b. No customer who is ~~disabled or otherwise~~ presents evidence that he/she is on life support and a disconnection would create a safety or health risk shall be disconnected without an in-person visit from a utility representative.
10. Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company shall meet and recommend to the Commission uniform disconnection notices that fit within each utility's existing credit and collections processes ~~notice of disconnection procedures to be implemented~~ by October 1, 2010.
11. Pacific Gas and Electric Company and Southern California Edison Company shall provide a field person who can ~~collect on a bill~~ allow a customer to avoid disconnection through various means during an in-person visit prior to disconnection for ~~medical baseline,~~ life support or disabled customers.
13. Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company and Southern California Gas Company are authorized to charge significant costs associated with complying with the new practices continued or initiated in this proceeding to their established memorandum accounts. Memorandum account information shall be provided to the Energy Division by the 25<sup>th</sup> day of each month.

14. Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company and Southern California Gas Company are directed to file monthly reports in this proceeding of additional data as shown on Appendix A. The monthly reports shall be filed by the 25<sup>th</sup> day of each month commencing with the first month following the effective date of this decision.

**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 SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS TO THE INTERIM DECISION IMPLEMENTING METHODS TO DECREASE THE NUMBER OF GAS AND ELECTRIC UTILITY SERVICE DISCONNECTIONS on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **7<sup>th</sup> day of July, 2010**, at Rosemead, California.

/s/ RAQUEL IPPOLITI

Raquel Ippoliti  
Project Analyst  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770



California Public  
Utilities Commission

CPUC Home

## CALIFORNIA PUBLIC UTILITIES COMMISSION

### Service Lists

**PROCEEDING: R1002005 - CPUC - OIR TO ADDRES**

**FILER: CPUC**

**LIST NAME: LIST**

**LAST CHANGED: JUNE 22, 2010**

[DOWNLOAD THE COMMA-DELIMITED FILE](#)  
[ABOUT COMMA-DELIMITED FILES](#)

[Back to Service Lists Index](#)

### Parties

STEPHANIE C. CHEN  
THE GREENLINING INSTITUTE  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
FOR: THE GREENLINING INSTITUTE

JOHN HOWAT  
NATIONAL CONSUMER LAW CENTER  
7 WINTHROP SQUARE, 4TH FLOOR  
BOSTON, MA 02110  
FOR: NATIONAL CONSUMER LAW CENTER

DARLENE R. WONG  
STAFF ATTORNEY  
NATIONAL CONSUMER LAW CENTER  
7 WINTHROP SQUARE, 4TH FLOOR  
BOSTON, MA 02110-1245  
FOR: NATIONAL CONSUMER LAW CENTER

VALERIE J. ONTIVEROZ  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS, NV 89150  
FOR: SOUTHWEST GAS CORPORATION

DONALD L. SODERBERG  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193  
FOR: SOUTHWEST GAS CORPORATION

DEBI GALLO  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193-8510  
FOR: SOUTHWEST GAS CORPORATION

DEBRA BOSIEY  
SOUTHWEST GAS CORPORATION  
PO BOX 98510  
LAS VEGAS, NV 89193-8510  
FOR: SOUTHWEST GAS CORPORATION

ELENA MELLO  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD  
RENO, NV 89520  
FOR: SIERRA PACIFIC POWER CO.

TREVOR DILLARD  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD, MS S4A50 / PO BOX 10100  
RENO, NV 89520-0024  
FOR: SIERRA PACIFIC POWER CO.

AKBAR JAZAYEIRI  
DIR OF REVENUE & TARIFFS  
SOUTHERN CALIFORNIA EDISON COMPANY (338)  
2241 WALNUT GROVE AVE. / PO BOX 800  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

CHRIS DOMINSKI  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE, SUITE 309  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

DARRAH MORGAN  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE / PO BOX 800  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

DOUG SNOW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

JIM YEE  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE.  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

JOHN MONTANYE  
SOUTHERN CALIFORNIA EDISON  
2244 WALNUT GROVE AVE.  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

MARYBETH QUINLAN  
SOUTHERN CALIFORNIA EDISON CO.  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

MONICA GHATTAS  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

RONALD MOORE  
SR. REGULATORY ANALYST  
GOLDEN STATE WATER COMPANY  
630 EAST FOOTHILL BLVD.  
SAN DIMAS, CA 91773  
FOR: GOLDEN STATE WATER COMPANY  
(U-913-E)

KIM F. HASSAN  
SAN DIEGO GAS & ELECTRIC COMPANY  
101 ASH STREET, HQ-12  
SAN DIEGO, CA 92101  
FOR: SAN DIEGO GAS & ELECTRIC COMPANY,  
SOUTHERN CALIFORNIA GAS

TODD J. CAHILL  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT  
SAN DIEGO, CA 92123  
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

KATHY WICKWARE  
SAN DIEGO GAS & ELECTRIC CO.  
8330 CENTURY PARK COURT, CP32C  
SAN DIEGO, CA 92123-1548  
FOR: SAN DIEGO GAS & ELECTRIC CO.

AUSTIN M. YANG  
CITY AND COUNTY OF SAN FRANCISCO  
OFFICE OF THE CITY ATTORNEY, RM. 234  
1 DR. CARLTON B. GODDLETT PLACE  
SAN FRANCISCO, CA 94102  
FOR: CITY AND COUNTY OF SAN FRANCISCO

DENNIS J. HERRERA  
CITY AND COUNTY OF SAN FRANCISCO  
CITY HALL, ROOM 234  
SAN FRANCISCO, CA 94102  
FOR: CITY AND COUNTY OF SAN FRANCISCO

JEANNE SMITH  
SOUTHERN CALIFORNIA EDISON COMPANY  
601 VAN NESS AVE.  
SAN FRANCISCO, CA 94102  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

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

MARION PELEO  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4107  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: DRA

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

SARAH J. SMITH  
SOUTHERN CALIFORNIA EDISON COMPANY  
601 VAN NESS AVENUE, STE 2040  
SAN FRANCISCO, CA 94102-6310  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

HAYLEY GOODSON  
THE UTILITY REFORM NETWORK

BERNARD LAM  
PACIFIC GAS AND ELECTRIC COMPANY

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

77 BEALE STREET, MAIL CODE B10C  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

BRIAN CHERRY  
PACIFIC GAS AND ELECTRIC COMPANY (39)  
77 BEALE STREET ROOM 1087  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC COMPANY  
(U-39-E/G)

DANIEL F. COOLEY  
ATTORNEY AT LAW  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B30A, PO BOX 7442  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

DAVID POSTER  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE ST., MC B10A  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

SHILPA RAMAIYA  
PACIFIC GAS & ELECTRIC COMPANY  
245 MARKET STREET, MAIL CODE N3C  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

MICHAEL B. DAY  
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111-3133  
FOR: WILD GOOSE STORAGE

JOHN DUTCHER  
MOUNTAIN UTILITIES  
3210 CORTE VALENCIA  
FAIRFIELD, CA 94534-7875  
FOR: MOUNTAIN UTILITIES (U-906-E)

MELISSA W. KASNITZ  
DISABILITY RIGHTS ADVOCATES  
2001 CENTER STREET, FOURTH FLOOR  
BERKELEY, CA 94704-1204  
FOR: DISABILITY RIGHTS ADVOCATES

THOMAS R. DILL  
PRESIDENT  
LODI GAS STORAGE, LLC  
23265 N. STATE RT. 99 W. FRONTAGE RD  
ACAMPO, CA 95220  
FOR: LODI GAS STORAGE, LLC (U-912-G)

MICHAEL LAMOND  
ALPINE NATURAL GAS OPERATING COMPANY  
PO BOX 550  
15 ST. ANDREWS ROAD, SUITE 7  
VALLEY SPRINGS, CA 95252  
FOR: ALPINE NATURAL GAS OPERATING CO.  
NO. 1, LLC (U-909-G)

WAYNE AMER  
PRESIDENT  
MOUNTAIN UTILITIES (906)  
PO BOX 205  
KIRKWOOD, CA 95646  
FOR: MOUNTAIN UTILITIES (U-906-E)

JAMES HODGES  
1069 45TH STREET  
SACRAMENTO, CA 95819  
FOR: ASSOCIATION OF CALIFORNIA  
COMMUNITY AND ENERGY SERVICES (ACCES);  
THE EAST L.A. COMMUNITY UNION; THE  
MARAVILLA FOUNDATION

RAYMOND J. CZAHAR, C.P.A.  
WEST COAST GAS COMPANY  
9203 BEATTY DRIVE  
SACRAMENTO, CA 95826  
FOR: WEST COAST GAS COMPANY

ARIEL SON  
PACIFICORP  
825 N.E. MULTNOMAH, SUITE 300  
PORTLAND, OR 97232  
FOR: PACIFICORP

CATHIE ALLEN  
DIR., REGULATORY AFFAIRS  
PACIFICORP  
825 NE MULTNOMAH STREET, SUITE 2000  
PORTLAND, OR 97232  
FOR: PACIFICORP

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

JASON A. DUBCHAK  
WILD GOOSE STORAGE LLC  
607 8TH AVENUE S.W., SUITE 400  
CALGARY, AB T2P 0A7  
CANADA  
FOR: WILD GOOSE STORAGE LLC

## Information Only

---

HOLLY LLOYD

KRISTIEN TARY

SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS, NV 89150

STATE REGULATORY AFFAIRS  
SOUTHWEST GAS CORPORATION  
5241 SPRING MOUNTAIN ROAD  
LAS VEGAS, NV 89150

GREGORY HEALY  
SOCALGAS/SDG&E  
555 WEST FIFTH STREET, GT14D6  
LOS ANGELES, CA 90013

DANIEL A. DELL'OSA  
SAN GABRIEL VALLEY WATER COMPANY  
11142 GARVEY AVE., PO BOX 6010  
EL MONTE, CA 91733-2425

TIMOTHY J. RYAN  
SAN GABRIEL VALLEY WATER CO.  
11142 GARVEY AVE., PO BOX 6010  
EL MONTE, CA 91733-2425

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE. / PO BOX 800  
ROSEMEAD, CA 91770

JENNIFER M. TSAO SHIGEKAWA  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770

CENTRAL FILES  
SAN DIEGO GAS AND ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP31-E  
SAN DIEGO, CA 92123

MICHAEL A. BAILEY  
25801 MARGUERITE PARKWAY, NO. 103  
MISSION VIEJO, CA 92692

JEANNE M. SOLE  
CITY AND COUNTY OF SAN FRANCISCO  
CITY HALL, RM 234  
1 DR. CARLTON B. GOODLET PLACE  
SAN FRANCISCO, CA 94102-4682

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

BONNIE TAM  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MC B10A, PO BOX 770000  
SAN FRANCISCO, CA 94105

CPUC FILE ADMINISTRATION  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B30A  
SAN FRANCISCO, CA 94105

KAREN FORSGARD  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, B10A / BOX 770000 B8Q  
SAN FRANCISCO, CA 94105

CASSANDRA SWEET  
DOW JONES NEWSWIRES  
201 CALIFORNIA ST., 13TH FLOOR  
SAN FRANCISCO, CA 94111

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

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

MICHELLE L. WILSON  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442, LAW DEPT.  
SAN FRANCISCO, CA 94120

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

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

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

JEAN CHUNG  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, 2ND FLOOR  
BERKELEY, CA 94704

SAMUEL S. KANG  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, SECOND FLOOR  
BERKELEY, CA 94704

JACK KRIEG  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

JOY A. WARREN  
MODESTO IRRIGATION DISTRICT

LINDA FISHER  
MODESTO IRRIGATION DISTRICT

1231 11TH STREET  
MODESTO, CA 95354

1231 11TH STREET  
MODESTO, CA 95354

LOU HAMPEL  
MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354

LORENZON TRAN-HAGOS  
885 EMBARCADERO DR.  
SACRAMENTO, CA 95605

RON AKER  
PACIFIC GAS AND ELECTRIC COMPANY  
885 EMBARCADERO DR., ROOM 1113  
SACRAMENTO, CA 95606

BARB COUGHLIN  
PACIFICORP  
825 NE MULTNOMAH, SUITE 800  
PORTLAND, OR 97232

MARISA DECRISTOFORO  
PACIFICORP  
825 NE MULTNOMAH STREET, SUITE 800  
PORTLAND, OR 97232

MICHELLE R. MISHOE  
PACIFICORP  
825 NE MULTNOMAH STREET, SUITE 1800  
PORTLAND, OR 97232

## State Service

---

TORY FRANCISCO  
DEMAND SIDE RESOURCES BRANCH  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
OFFICE 4-A  
EMAIL ONLY  
EMAIL ONLY, CA 00000

AVA N. TRAN  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

BRUCE DEBERRY  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5043  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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

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

LEE-WHEI TAN  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY PRICING AND CUSTOMER PROGRAMS BRA  
ROOM 4102  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: DRA

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

ZAIDA AMAYA-PINEDA  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814

---

**[TOP OF PAGE](#)**  
**[BACK TO INDEX OF SERVICE LISTS](#)**