

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



FILED
12-13-10
04:59 PM

Order Instituting Rulemaking Regarding)
Policies and Protocols for Demand Response)
Load Impact Estimates, Cost-Effectiveness)
Methodologies, Megawatt Goals and)
Alignment with California Independent)
System Operator Market Design Protocols)

Rulemaking 07-01-041
(Filed January 25, 2007)
(Phase IV, Part 2)

**SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 M) INITIAL RESPONSE TO
ADMINISTRATIVE LAW JUDGE'S RULING SOLICITING RESPONSES
ON REMAINING DIRECT PARTICIPATION ISSUES (PHASE IV, PART 2)**

Steven D. Patrick

Attorney for

SAN DIEGO GAS & ELECTRIC COMPANY

555 West Fifth Street, Suite 1400

Los Angeles, CA 90013-1011

Phone: (213) 244-2954

Fax: (213) 629-9620

E-Mail: sdpatrick@semprautilities.com

December 13, 2010

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

Order Instituting Rulemaking Regarding)	
Policies and Protocols for Demand Response)	
Load Impact Estimates, Cost-Effectiveness)	
Methodologies, Megawatt Goals and)	
Alignment with California Independent)	
System Operator Market Design Protocols)	
<hr/>		
		Rulemaking 07-01-041 (Filed January 25, 2007) (Phase IV, Part 2)

**SAN DIEGO GAS & ELECTRIC COMPANY’S (U 902 M) INITIAL RESPONSE TO
ADMINISTRATIVE LAW JUDGE’S RULING SOLICITING RESPONSES
ON REMAINING DIRECT PARTICIPATION ISSUES (PHASE IV, PART 2)**

**I.
INTRODUCTION**

San Diego Gas & Electric Company (“SDG&E”) respectfully submit comments in response to Administrative Law Judge (“ALJ”) Farrar’s Ruling (“Ruling”) issued November 8, 2010, in the above captioned proceeding.¹

**II.
SUMMARY**

The November 8, 2010 Ruling solicits input from parties on a host of separate issues, including consumer protection, financial settlement and communication concerns that require resolution before the California Public Utilities Commission (“Commission” or “CPUC”) allows direct bidding in the California Independent System Operator’s (“CAISO”) markets. In accordance with the Ruling, these comments respond only to issues related to consumer protections issues and straw proposals on financial settlement and communication protocols, and specifically encompass questions outlined in Section 3.1, Section 3.2.2 and Section 3.3.

SDG&E’s responses to this set of questions addresses the issues of: (1) consumer protection; (2) energy settlement and payment associated with the CAISO PDR product and the relationship between the DRP and LSE; and (3) communication protocols. A number of the

¹ On November 17, 2010, ALJ Farrar granted an extension until December 13, 2010, to submit comments on the consumer protection issues and straw proposals on financial settlement and communication protocols.

questions are effectively restatements of other questions contained herein and, as such, SDG&E's responses to several of the questions are brief since detailed responses are provided in other answers.

A. Consumer Protection Issues

1) What specific scenarios may arise from the DRP-retail customer relationship that would warrant specific consumer protections for IOU retail consumers?

The acquisition and transmission of any customer confidential or proprietary data pursuant to any DR transactions could give rise to the need for consumer protections for IOU retail consumers.

2) Should the CPUC exercise its authority over retail electric consumer protection or leave such issues to be addressed through other policies/forums? If the CPUC should not exercise its authority over retail electric consumer protection, identify the specific consumer protection policies/forums that will sufficiently address the scenarios identified in 1) above.

The Commission should exercise its authority over retail electric consumer protection.

3) If the CPUC should exercise its authority over retail electric consumer protection, are there existing CPUC or external regulatory models or processes that would assist in the development of appropriate consumer protections in this context (e.g., "slamming" and "cramming" prohibitions and Electricity Service Provider registration)?

Electricity Service Provider registration seems to be the simplest means for the Commission to exercise its authority over retail electric consumer protection.

4) What methods could/should the CPUC use to implement consumer protection measures?

a) Should the CPUC require DRPs to register with the CPUC? What would be the benefits and/or detriments of any such registration requirements? What should any such registration entail (for example, identity of corporate officers and bond requirements)?

See 3 above.

b) Should the CPUC implement a consumer complaint process for DRPs, similar to its complaint process for IOUs?

Yes.

- c) **Alternatively, can the CAISO’s Scheduling Coordinator registration process be leveraged to provide benefits that would assist in the protection of retail customers?**

The Scheduling Coordinator registration process is designed to establish the commercial and financial relationship between an entity participating in the wholesale market and the CAISO. It is not designed to track account activity at the retail level excepting the PDR process.

The CAISO tariff establishes rules of conduct for Scheduling Coordinators. However these rules may not be sufficient to ensure that retail customers are adequately protected.

- d) **What role, if any, do the IOUs have with a DRP registration process (either at the CPUC or with the CAISO’s Scheduling Coordinator registration process, assuming that process could be leveraged)?**

The IOUs should have no role in a DRP registration process other than to be apprised which DRPs are properly registered and authorized to provide services. This is accomplished through the PDR registration process in the CAISO Demand Response system.

- 5) **Please set forth a plan for the implementation of any necessary and/or appropriate protections.**

Any such plan should be developed among the stakeholders in a workshop.

3.2.2. Straw Proposals on How to Do a Financial Settlement

- 19) **What would be the appropriate method of determining the amount one party would pay another party? Specify the formula that would calculate the amount.**

SDG&E proposes that the amount owed by the DRP to the LSE would be calculated as follows:

Amount = Quantity * Price

Quantity = CAISO calculated Default Load Adjustment (DLA)

Price = CAISO Default Load Aggregation Point (DLAP) Day-Ahead Locational Marginal Price (LMP) corresponding to each hour of the DLA

- 20) **If the financial settlement formula involves an energy price, specify the source of the energy price, including its (a) market (CAISO Energy, CAISO Ancillary Services, other), (b) time frame (day-ahead, hour-ahead, real-time), (c) averaging period of granularity (one hour, five minutes), (d) geographic specificity (Default Load Aggregation Point (DLAP), CLAP, other geographic unit).**

The energy price SDG&E proposes to use is the CAISO DLAP Day-Ahead LMP. This price is published on the Open Access Same-Time Information System (“OASIS”) by the CAISO after the day ahead market is completed. In addition, this price is included on the settlement statements issued by the CAISO.

- (a) Market = CAISO Energy
- (b) Time Frame = Day-Ahead
- (c) Averaging Period of Granularity = One hour
- (d) Geographic Specificity = DLAP

21) If the financial settlement formulas involves an energy quantity, specify the precise method of determining that energy quantity, including: (a) baseline used, (b) source of meter data (CAISO, IOU, DRP), (c) averaging period of granularity (one hour, five minute), and (d) geographic specificity (DLAP, CLAP, other geographic unit).

The energy quantity SDG&E proposes to use is the CAISO calculated DLA. The DLA will be available on the settlement statements issued by the CAISO.

- (a) Baseline Used: Baseline used by the CAISO to calculate the DLA
- (b) Source of Meter Data: Settlement quality meter data reported to the CAISO and used in the CAISO settlement statements
- (c) Averaging Period of Granularity: Ten minutes, consistent with the settlement interval used by the CAISO in its settlement statements
- (d) Geographic Specificity: DLAP

22) If the financial settlement formula involves a capacity or demand quantity, specify the precise method of determining that capacity quantity, including: (a) baseline used, (b) source of meter data (CAISO, IOU, DRP), (c) averaging period or granularity (one hour, five minute), and (d) geographic specificity (DLAP, CLAP, other geographic unit).

SDG&E does not propose that capacity or demand quantity be used.

23) Should the financial settlement process take the form of the CPUC-approved standard contract(s), tariffs, or some other vehicle? Be specific.

Yes. There must first be a tariff between the LSE and customer that is participating in the demand response program. Second, there must be a standard contract between the LSE and the DRP. The development of the tariff and the standard contract should be included as items to be developed in the CPUC facilitated workshops.

24) What is the appropriate PDR price, if one exists, that ensures: (a) That the resulting total cost of energy is less than or equal to the total cost of energy in the absence of PDR or similar CAISO products? (b) That DRPs, beyond the IOUs, will have sufficient financial incentives to provide DR in California?

As previously stated, SDG&E proposes that parties use the day-ahead market price published by the CAISO for the DLAP in which the load is located. This will ensure that DRPs have a known energy price they can use in their real-time PDR energy bids, similar to other generation resources. These real-time bids are used by the CAISO to physically dispatch the PDR.

25) What form of billing and payment procedure should be used for a financial settlement (i.e., electronic funds transfer outside of CAISO, standard inter-scheduling-coordinator (SC) trade, other)?

SDG&E recommends that electronic funds transfer outside of CAISO be used for the financial settlement between the DRP and the LSEs. The details regarding the billing and payment procedures should be included in the standard contract to be developed as described in #23 above.

26) Over how many days should PDR transactions be netted and summed for rendering settlement bills? Within how many days after the end of a billing period should payment for the period's net PDR transactions be received?

SDG&E recommends that the financial settlement between the DRP and the LSE occur monthly. Since the CAISO daily initial settlements are not available until seven business days after the trade date, SDG&E proposes that the invoice prepared by the LSE to the DRP for the prior month should be sent on the 15th of each month with a due date of 10 days later. In addition, the CAISO will issue recalculation settlement statements² that may impact the amount

² Recalculation settlement statements are published by the CAISO on 38 business days, 76 business days, 18 months, 35 months and 36 months after the trade date.

previously billed. Any applicable adjustments from the recalculation settlement statements should be included with the next monthly invoice.

27) What venue and procedures should be used to address and resolve disputes about settlement procedures and transactions?

The details regarding addressing and resolving disputes should be included in the standard contract to be developed as described in #23 above.

28) What credit requirements should apply to parties participating in CAISO's PDR market? Which types of parties should these credit requirements apply to, what evidence of creditworthiness should be provided, and who should decide whether a party's creditworthiness has been adequately established?

In addition to any specific credit requirements that the CAISO will have, credit requirements must be established between the DRP and LSE to cover incremental credit requirements imposed on the LSE by the CAISO, if any, and the risk of default by the DRP to the LSE based on the creditworthiness of the DRP. The credit requirements should be included in the standard contract to be developed as described in #23 above.

29) Are there any items not mentioned above that should be included in a settlement system/protocol?

Yes, there should be provisions that address when SDG&E is the SC for the DRP and how the revenues received from the CAISO for the PDR should be transferred to the DRP.

30) Lastly, in D.09-08-027 the CPUC adopted a standardized baseline method for measuring Demand Response performance for settlement purposes between IOUs and its demand response participants. The CAISO has selected a baseline for PDR that differs slightly from the baseline adopted in D.09-08-027. I ask for the parties' comments regarding why, for PDR or other CAISO products, it might be more appropriate to use the CAISO PDR baseline.

To facilitate the financial settlement between the DRP and LSE it is appropriate to use the CAISO PDR baseline as this will be used by the CAISO to calculate the performance of the PDR. While no baseline methodology is perfect, the CAISO methodology was exhaustively vetted by stakeholders throughout the PDR development process. Therefore SDG&E believes that all parties should adopt the CAISO methodology going forward for PDR.

Further, the load curtailment determined by this methodology will be made available to both the DRP and LSE (through the DLA) on their respective CAISO settlement statements and can be used by the parties to independently confirm the financial settlement quantity. Adoption of another baseline methodology would unnecessarily add delay and administrative burden in implementing third-party PDR.

C. Communication Issues

None of SDG&E's responses to Communication Issues contemplate the amount of information that would be required for the allowance of a single customer being included in multiple PDRs (dual participation). SDG&E's current understanding is, that while the CAISO ultimately may allow a service account to be in more than one PDR, currently a customer can only be in a one PDR registration at any given time.

31) What data will DRPs need from LSEs and Utility Distribution Companies (UDCs) (in cases where the UDC and the LSE are not the same entity) in order to facilitate DRP bidding in CAISO PDR markets?

The CAISO predicates the data necessary to register and create a PDR in the CAISO system for bidding into its markets and documents those requirements in its Business Practice Manual ("BPM") for Metering. Presuming that the DRP has a business relationship with the end use customer that it is registering with the CAISO, the two data items that it needs to obtain or verify with the LSE/UDC are the Utility service account number and meter numbers associated with each service account. In addition, the DRP must submit 45 days of historical load data to the CAISO's Demand Response System (DRS) per CAISO's guidelines.

For the purpose of DRP financial settlement with the CAISO, the DRP must obtain meter data for each of the meters in a PDR registration from the LSE/UDC so that the DRP Scheduling Coordinator can submit that data directly to the CAISO

a. Specify whether portions of the data identified above are confidential, and what procedures should be used to appropriately handle confidential data?

The actual meter data is confidential including historical data used to establish the baseline for each service account. Any of the current methods for adequately protecting the confidentiality of meter data utilized by the LSE/UDC would be appropriate. The practice currently in place for LSE transfer of meter data to DA and CCA entities could be replicated

with minimal effort. To the extent that this could not be accomplished, the DRP should acquire meter data directly from the end use customer with which it has an established commercial relationship employing appropriate protections for confidential data.

32) What data will LSEs and UDCs (in cases where the UDC and the LSE are not the same entity) need from DRPs in order to facilitate DRP bidding in CAISO PDR markets?

The LSE and UDC need to know the service account numbers and meter numbers that the DRP proposes to bid into the market so that they can determine end use customer eligibility to participate in a PDR. The CAISO facilitates this exchange of data through its CAISO DRS which allows the LSE and UDC (whether the same entity or not) an opportunity to review all registrations submitted by DRPs. Initially the CAISO registration review process required that the LSE and the UDC approve registration prior to the CAISO accepting them, but FERC determined that the CAISO could not enforce that role.

For the purpose of establishing the exchange of meter data, the DRP would need to provide an accounting of each of the meter numbers in an active PDR which the UDC/LSE should be able to verify through the CAISO DRS.

For the LSE to verify and reconcile the DLA that the CAISO applies to the LSE SCs metered load, the LSE must acquire each PDR performance measurement from the DRP or the CAISO. This quantity will be the primary basis for determining the energy compensation between the DRP and the LSE. The LSE has access to the DLA in its CAISO settlement detail files and the CAISO DR system. In circumstances in which the CAISO settlement or DR systems fails to provide information on an event day, then the DRP and LSE would have to exchange such data on a bilateral basis.

a. Specify whether portions of the data identified above are confidential, and what procedures should be used to appropriately handle confidential data?

In addition to the meter data (including the historical meter data) which should be treated as confidential in the manner described in the answer to 31(a), the DLA information is confidential. The CAISO DRS system access and permissions reasonably protect the confidentiality of the data if that is the manner in which it is obtained. To the extent that the DRP and LSE exchange the data outside of the DRS, then a separate confidentiality agreement would be necessary between the LSE/UDC and each DRP.

33) What other services, if any, will DRPs need from LSEs and UDCs (in cases where the UDC and the LSE are not the same entity) in order to facilitate DRP bidding in CAISO PDR markets?

The CAISO requires that meter data associated with the delivery of real-time energy or energy from ancillary services be provided in five minute increments. Typically load meter data, even if acquired from interval meters, is submitted to the CAISO in hourly increments. While a DRP required to submit 5 minute data could derive that by dividing hourly meter data by 12, a more accurate settlement would be achieved with more granular load meter data (15 or 5 minute). DRPs may desire the more granular delivery of meter data which based on current practices would be a new and additional service from the LSE/UDC to the DRP.

34) When must the specified data be received by the recipient? Specify in terms such as “Trade date plus or minus xx minutes or hours”.

For inclusion in the CAISO Initial Settlement statement which is published seven business days after a trade (operating) date, meter data is due at 12 PM (noon) five (5) business days after the trade date. The DRP reasonably must meter and submit to the CAISO the meter data by midnight four (4) business days after the trade date.

The CAISO PDR registration process determines the timelines for submitting and reviewing registration information and it is reasonable to expect the DRP, LSE and UDC to follow those timelines.

35) What procedures and rules should apply if there is a breakdown in communications between parties? For example, what should happen if a DRP sends required information to the LSE late?

Late delivery of meter data from the LSE/UDC to the DRP is the most likely process to be impacted by a breakdown in communication. While the CAISO will not estimate performance of a PDR event without meter data, its multiple settlement scheme provides a second opportunity at 47 business days after the trade date for meter data to be submitted which is ample time to correct errors.

36) A matrix entitled “Exhibit C-2, SCE Matrix” is attached hereto in Appendix A. That matrix listed possible PDR business processes and timeframes, and indicated roles in each process for IOUs, DRPs, ESPs, the CAISO, and customers. Any party who disagrees with any part of “Exhibit C-2, SCE Matrix” or wishes to add information to that matrix should provide a matrix, using the same layout, indicating the party’s view of the necessary business processes, roles, and timeframes.

The supplied Matrix is out of date since its development predated the CAISO final design. Many of the concerns and issues in the Matrix have been addressed by the CAISO PDR registration process. SDG&E suggests that it be abandoned since it no longer informs the issues under consideration.

37) Will any part of the PDR processes require provision of ESPs’ confidential information? E.g., ESP rates, ESP customer identification? ESP customer load data? If so, please specify the types of such data, and the purpose for which such data would be needed in any process required to implement the CAISO’s PDR market.

SDG&E’s proposal for financial settlement between the LSE and DRP deliberately avoids the issue to include confidential data other than the DLA in determining compensation to the LSE for undercollection.

38) Are there any items not mentioned above that should be included in the communications protocols?

SDG&E at this time is not aware of any additional items that should be included in the communications protocols.

39) If the Commission does not order a financial settlement between DRPs and IOUs, please indicate which of the above data would not need to be communicated among PDR participants.

In the absence of a financial settlement, all of the above data is still required to facilitate participation and settlement in the CAISO market.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 M) INITIAL RESPONSE TO ADMINISTRATIVE LAW JUDGE'S RULING SOLICITING RESPONSES ON REMAINING DIRECT PARTICIPATION ISSUES (PHASE IV, PART 2)** on all parties of record in R.07-01-041 by electronic mail and by U.S. mail to those parties who have not provided an electronic address to the Commission.

Copies were also sent via Federal Express to Administrative Law Judge Darwin Farrar, ALJ Jessica Hecht, ALJ Timothy Sullivan and Commissioner Dian Grueneich.

Dated at Los Angeles, California, this 13th day of December, 2010.

/s/ Marivel Munoz

Marivel Munoz

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists: R.07-01-041 - Last Changed: December 9, 2010

martinhomec@gmail.com; sue.mara@rtoadvisors.com; sdebroff@rhoads-sinon.com;
keith.mccrea@sablaw.com; rmettling@bluepointenergy.com; SDPatrick@SempraUtilities.com;
klatt@energyattorney.com; douglass@energyattorney.com; janet.combs@sce.com;
liddell@energyattorney.com; ames_doug@yahoo.com; jellis@resero.com; lms@cpuc.ca.gov;
marcel@turn.org; mflorio@turn.org; nes@a-klaw.com; rcounihan@enernoc.com;
saw0@pge.com; mgo@goodinmacbride.com; jeffgray@dwt.com; irene@igc.org;
ssmyers@att.net; wbooth@booth-law.com; kowalewskia@calpine.com; eric@strategyi.com;
ja_booth@yahoo.com; rquattrini@energyconnectinc.com; bhines@svlg.net;
brbarkovich@earthlink.net; bdicapo@caiso.com; lnavarro@edf.org; kmills@cfbf.com;
ABesa@SempraUtilities.com; clamasbabbini@comverge.com; elvine@lbl.gov; ttutt@smud.org;
tglassey@certichron.com; cpuc@certichron.com; mrw@mrwassoc.com;
smaye@nappartners.com; clark.pierce@us.landisgyr.com; nplanson@consumerpowerline.com;
mpieniazek@drenergyconsulting.com; wchen@ecsgrid.com; gesmith@ecsny.com;
apetersen@rhoads-sinon.com; miino@rhoads-sinon.com; CCole@currentgroup.com;
stephen.baker@constellation.com; tcarlson@rrienergy.com;
dan.violette@navigantconsulting.com; kcooney@summitblue.com; sschare@summitblue.com;
barrettlarry@comcast.net; david@nemtzwow.com; jcluboff@lmi.net; david.reed@sce.com;
joyce.leung@sce.com; marian.brown@sce.com; mark.s.martinez@sce.com;
andrea.horwatt@sce.com; carl.silsbee@sce.com; Case.Admin@sce.com;
Fadia.Khoury@sce.com; Jennifer.Shigekawa@sce.com; ka-wing.poon@sce.com;
larry.cope@sce.com; olivia.samad@sce.com; garwacrd@sce.com; nquan@gswater.com;
dwood8@cox.net; DBarker@SempraUtilities.com; KSmith2@SempraUtilities.com;
LDavidson@SempraUtilities.com; LWrazen@SempraUtilities.com;
CentralFiles@SempraUtilities.com; JYamagata@SempraUtilities.com; Dave.Hanna@itron.com;
gayres@energycoalition.org; dwylie@aswengineering.com; hvidstenj@kindermorgan.com;
shawn_cox@kindermorgan.com; mtierney-lloyd@enernoc.com;
pk@utilitycostmanagement.com; chris@emeter.com; Paul.karr@trilliantnetworks.com;
sharon@emeter.com; theresa.mueller@sfgov.org; mgm@cpuc.ca.gov; tcr@cpuc.ca.gov;
srovetti@sfgwater.org; tburke@sfgwater.org; dcengel@fscgroup.com; elaine.s.wei@pjc.com;
snuller@ethree.com; jwwd@pge.com; filings@a-klaw.com; kea3@pge.com; lhj2@pge.com;
mrh2@pge.com; mpa@a-klaw.com; SRH1@pge.com; aliddell@icfi.com; steven@sfpower.org;
ahmad.faruqui@brattle.com; bcragg@goodinmacbride.com; bdille@jmpsecurities.com;
joshdavidson@dwt.com; rafi.hassan@sig.com; robertgex@dwt.com; sdhilton@stoel.com;
salleyoo@dwt.com; cem@newsdata.com; CRMd@pge.com; CPUCCases@pge.com;
MAGq@pge.com; regrelcpuccases@pge.com; mrh2@pge.com; rwalther@pacbell.net;
Service@spurr.org; clark.bernier@rlw.com; sean.beatty@mirant.com; smithmj@calpine.com;
cpjoe@gepllc.com; philha@astound.net; alex.kang@itron.com;
jody_london_consulting@earthlink.net; ted@energy-solution.com;
cpucdockets@keyesandfox.com; rschmidt@bartlewells.com; jskromer@qmail.com;
glbarbose@lbl.gov; agartner@energyconnectinc.com; emahlon@ecoact.org;
janreid@coastecon.com; arg@enertechnologies.com; jshields@ssjid.com; joyw@mid.org;
rogerv@mid.org; tomk@mid.org; jweil@aglet.org; gayatri@jbsenergy.com;
jeff@jbsenergy.com; dgrandy@caonsitegen.com; davidmorse9@gmail.com;

rmccann@umich.edu; jgoodin@caiso.com; mgillette@enernoc.com;
Saeed.Farrokhpay@ferc.gov; e-recipient@caiso.com; mary.lynch@constellation.com;
lwhouse@innercite.com; cmkehrrein@ems-ca.com; brian.theaker@dynegy.com;
dhungerf@energy.state.ca.us; msherida@energy.state.ca.us; bernardo@braunlegal.com;
abb@eslawfirm.com; vwood@smud.org; bboice02@yahoo.com; karen@klindh.com;
rogerl47@aol.com; sas@a-klaw.com; bschuman@pacific-crest.com; jholmes@emil.com;
tylerb@poweritsolutions.com; DBR@cpuc.ca.gov; JYM@cpuc.ca.gov; ag2@cpuc.ca.gov;
agc@cpuc.ca.gov; bsk@cpuc.ca.gov; cec@cpuc.ca.gov; crv@cpuc.ca.gov; edf@cpuc.ca.gov;
dnl@cpuc.ca.gov; edd@cpuc.ca.gov; hcf@cpuc.ca.gov; jc8@cpuc.ca.gov; jhe@cpuc.ca.gov;
joc@cpuc.ca.gov; kkm@cpuc.ca.gov; kho@cpuc.ca.gov; lob@cpuc.ca.gov; mjd@cpuc.ca.gov;
jpn@cpuc.ca.gov; wtr@cpuc.ca.gov; bkb@cpuc.ca.gov; scl@cpuc.ca.gov; skg@cpuc.ca.gov;
tjs@cpuc.ca.gov; claufenb@energy.state.ca.us; centralfiles@semprautilities.com;
mmunoz@semprautilities.com

KEN SKINNER
Integral Analytics, Inc.
312 Walnut Street, Suite 1600
Cincinnati, OH 45202

GRAYSON HEFNER
15525 Ambiance Drive
N. Potomac, MD 20878

WILLIAM D. ROSS
Constellation New Energy
520 S. Grand Avenue, Suite 3800
Los Angeles, CA 90071

WARREN MITCHELL
The Energy Coalition
15615 Alton Parkway, Suite 245
Irvine, CA 92618

STEVE GEORGE
GSC Group
101 Montgomery Street, 15th Floor
San Francisco, CA 94104