



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)

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON
QUESTIONS 1-5 AND 19-39 OF ADMINISTRATIVE LAW JUDGE FARRAR'S
RULING SOLICITING RESPONSES ON REMAINING DIRECT PARTICIPATION
ISSUES (PHASE IV, PART 2)**

JENNIFER T. SHIGEKAWA
FADIA RAFEEDIE KHOURY

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6008
Facsimile: (626) 302-7740
E-mail: fadia.khoury@sce.com

Dated: **December 13, 2010**

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON
 QUESTIONS 1-5 AND 19-39 OF ADMINISTRATIVE LAW JUDGE FARRAR’S RULING
 SOLICITING RESPONSES ON REMAINING DIRECT PARTICIPATION ISSUES
 (PHASE IV, PART 2)**

TABLE OF CONTENTS

Section	Page
I. INTRODUCTION	1
II. RESPONSES TO ALJ FARRAR’S QUESTIONS 1-5 AND 19-39	2
A. Question 1 - What specific scenarios may arise from the DRP-retail customer relationship that would warrant specific consumer protections for IOU retail consumers?	2
B. Question 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.	4
C. Question 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)?	4
D. Question 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)?.....	5
E. Question 5 - Please set forth a plan for the implementation of any necessary and/or appropriate protections.....	6
F. Question 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.	6
G. Question 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 or granularity	

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON
 QUESTIONS 1-5 AND 19-39 OF ADMINISTRATIVE LAW JUDGE FARRAR’S RULING
 SOLICITING RESPONSES ON REMAINING DIRECT PARTICIPATION ISSUES
 (PHASE IV, PART 2)**

TABLE OF CONTENTS (CONTINUED)

Section	Page
(one hour, five minute), (d) geographic specificity (Default Load Aggregation Point (DLAP), CLAP, other geographic unit).....	9
H. Question 21 - If the financial settlement formula 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 or granularity (one hour, five minute), and (d) geographic specificity (DLAP, CLAP, other geographic unit).....	9
I. Question 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).....	10
J. Question 23 - Should the financial settlement process take the form of CPUC-approved standard contract(s), tariffs, or some other vehicle? Be specific.....	10
K. Question 24 - What is the appropriate PDR settlement 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?.....	10
L. Question 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)?.....	11
M. Question 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?.....	11
N. Question 27 - What venue and procedures should be used to address and resolve disputes about settlement procedures and transactions?.....	11
O. Question 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	

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON
 QUESTIONS 1-5 AND 19-39 OF ADMINISTRATIVE LAW JUDGE FARRAR’S RULING
 SOLICITING RESPONSES ON REMAINING DIRECT PARTICIPATION ISSUES
 (PHASE IV, PART 2)**

TABLE OF CONTENTS (CONTINUED)

Section	Page
should be provided, and who should decide whether a party’s creditworthiness has been adequately established?	12
P. Question 29 - Are there any items not mentioned above that should be included in a settlement system/protocol?	12
Q. Question 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 parties’ comments regarding why, for PDR or other CAISO products, it might be more appropriate to use the CAISO PDR baseline.	12
R. Question 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?	12
a. Specify whether portions of the data identified above are confidential, and what procedures should be used to appropriately handle confidential data?	13
S. Question 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?	13
a. Specify whether portions of the data identified above are confidential, and what procedures should be used to appropriately handle confidential data?	13
T. Question 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?	14
U. Question 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”	15

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON
 QUESTIONS 1-5 AND 19-39 OF ADMINISTRATIVE LAW JUDGE FARRAR’S RULING
 SOLICITING RESPONSES ON REMAINING DIRECT PARTICIPATION ISSUES
 (PHASE IV, PART 2)**

TABLE OF CONTENTS (CONTINUED)

Section	Page
V. Question 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?.....	15
W. Question 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.....	16
X. Question 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.	16
Y. Question 38 - Are there any items not mentioned above that should be included in the communications protocols?.....	16
Z. Question 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.	17
III. CONCLUSION.....	17

**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

Rulemaking 07-01-041
(Filed January 25, 2007)

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON
QUESTIONS 1-5 AND 19-39 OF ADMINISTRATIVE LAW JUDGE FARRAR'S
RULING SOLICITING RESPONSES ON REMAINING DIRECT PARTICIPATION
ISSUES (PHASE IV, PART 2)**

I.

INTRODUCTION

SCE respectfully submits these comments in response to Administrative Law Judge (ALJ) Farrar's Ruling Soliciting Responses On Remaining Direct Participation Issues (Phase IV, Part 2) ("Ruling"), issued on November 8, 2010. These comments address Questions 1-5 and 19-39, which cover "Consumer Protection Issues" and "Straw Proposals On Financial Settlement and Communication Protocols."¹ These comments are timely submitted because on November 17, 2010, ALJ Farrar extended the due date for these responses to December 13, 2010.

¹ Ruling, pp. 6-8, 14-18, p. 19.

II.

RESPONSES TO ALJ FARRAR'S QUESTIONS 1-5 AND 19-39

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

SCE focuses this response on third-party Demand Response Providers (DRPs), because the Commission already enforces compliance measures for consumer protections involving investor-owned utilities (IOUs) and Energy Service Providers (ESPs).

The specific scenarios that warrant consumer protections involving third-party DRPs are the same scenarios that motivated the California Legislature to enact Article 12 of Chapter 2.3 of the Public Utilities (P.U.) Code. Specifically, the Commission is empowered to enforce its jurisdiction over IOUs and ESPs to mitigate the following problems:

- Deceptive, unfair or abusive business practices in offering services to IOU retail customers;
- Businesses that are not financially viable, or at risk of being unable to meet their financial obligations;²
- Misuse of customer information, including the use or sale of such data for secondary purposes without the customer's consent;
- Inappropriate security measures for protecting confidential customer data, lack of compliance with privacy laws, etc.; and
- The lack of sophistication of small commercial or residential retail customers on applicable laws, and their lack of resources to pursue breach of contract or other claims in civil court.³

To mitigate the scenarios summarized above, Article 12 requires that the Commission impose the following obligations on IOUs and ESPs to enable them to adhere to minimum consumer protections:

² In the context of direct participation in the California Independent System Operator's (CAISO's) wholesale markets, customers agree to provide demand response to the DRP in exchange for compensation. The DRP must be sufficiently capitalized to meet its financial obligations to the retail customers.

³ See P.U. Code Sections 394 *et seq.*; also Section 391.

- Disclosure of pertinent information under oath, declaration or affidavit, including disclosure of any civil, criminal or regulatory sanctions or penalties pursuant to consumer protection laws, and disclosure of any felony convictions of officers or directors;
- Background checks on officers and directors to determine eligibility for registration;
- Registration with the CPUC prior to offering services;
- Proof of financial viability to ensure that customers have adequate recourse in the event of fraud or nonperformance;
- Proof of technical and operational ability;
- Requirements for treating customer data as confidential;
- Provision of a process at the CPUC for handling customer complaints, including investigation into alleged abuses;
- Denial or revocation of registration for cause.⁴

The consumer protections contemplated in Article 12 are already enforceable in the context of DRP services offered by IOUs and ESPs. They are entirely appropriate consumer protection measures for the CPUC to enforce in the context of third-party DRP services.

Moreover, retail consumers must be protected from mistakenly enrolling with two different DRPs at the same time, which PDR rules prevent. In the Direct Access (DA) context, the Utility Distribution Company (UDC) is assigned by the Commission to track, via a Direct Access Service Request (DASR), who a customer has selected as its load serving entity (LSE). A similar process can be envisioned for the UDC to track who the customers select as their DRP.⁵

⁴ See P.U. Code Sections 394 *et seq.*

⁵ Such a process would require that the UDC track the following information, for example: (1) A retail customer participating in a retail demand response program provided by an LSE (IOU or ESP) and attempting to participate in wholesale demand response directly or through another DRP; a DRP contracting with a retail customer who has already signed up with another DRP; a retail customer switching LSEs while also being served by a DRP, etc.

B. Question 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.

Yes, the CPUC should exercise its authority to enforce consumer protections over third-party DRPs because:

- Consumer protections are warranted, particularly for residential and small commercial customers, for the reasons stated in response to Q1;
- Other potential DRPs—the IOUs and ESPs—are already required to comply with CPUC-enforced consumer protections;
- Customers should have the same consumer protections and rights to pursue complaints at the CPUC regardless of whether their DRP is a third party DRP, or an IOU DRP or an ESP DRP;
- Given the CPUC’s current consumer protections role in the context of IOU and ESP services, and its expertise in demand response resources and programs, the CPUC is best positioned to enforce consumer protections in the context of third-party DRP services.

C. Question 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)?

The regulatory model used for ESPs is appropriate, including the following:

- Background checks, and registration and bond requirements to mitigate consumer risks associated with bad actors and financially unstable companies; and
- Switching rules, including the use of service request forms to implement switches between service providers, to mitigate the risk that service providers would switch customers’ DRP providers without the customers’ consent.

D. Question 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)?

Yes, the CPUC should require third-party DRPs to register with the Commission, submit to background checks of their corporate officers, and post bonds to demonstrate financial viability, similar to the registration requirements for ESPs. This process reasonably mitigates the risk of bad actors and financially unstable companies in the DRP market, both of which pose risks to consumers as discussed above. There is no detriment to such a process from the consumers' perspective. Nor is there a basis for concern that this approach would be unduly burdensome to third-party DRPs, because the CPUC has successfully implemented this process for ESPs for over 10 years.

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

Yes. It would be unfair and confusing to customers to require them to pursue remedies in civil or criminal courts when their DRP is a third party while at the same time permitting them to pursue complaints at the CPUC when their DRP is an IOU or an ESP.

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

To the extent CAISO's Scheduling Coordinator registration process applies to DRPs and/or their Scheduling Coordinators, this would provide another (not alternative) level of protection in the DRP market. It would not supplant the need for CPUC-adopted consumer protections for IOU retail customers.

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 have a role in ensuring compliance of third-party DRPs with CPUC-adopted consumer protections and other requirements, which are typically set forth in IOUs' tariffs. Therefore, SCE proposes that the CPUC direct the IOUs to draft a tariff rule to govern the direct participation of IOU customers in the CAISO markets, as discussed in response to question 5, below.

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

SCE proposes that the IOUs be directed to collaborate on drafting a tariff rule to govern the direct participation of IOU customers in the CAISO markets—similar to Rule 22 governing Direct Access service—which should set forth rules, requirements and consumer protections. Once drafted, the CPUC should hold a workshop to review the draft tariff rule and allow parties to provide input and ask questions. Thereafter, the IOUs should file for CPUC approval of the rule and any associated forms. This effort could be undertaken as part of this Phase IV, or, alternatively, as a compliance effort pursuant to a final decision in this Phase IV proceeding.

F. Question 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.

There are two alternative means by which an LSE can be made whole to account for the undercollection described in detail in SCE's responses to the Financial Settlement Questions (filed December 8). The LSE can either be compensated through a wholesale reference or index price or a retail reference price. Either process must, to the extent possible and practical, keep the LSE indifferent as to whether the retail customer *consumes* the energy or *curtails* the load.

A. Compensating the LSE Using The Wholesale Price

If the wholesale *price* is used to compensate the LSE, there are at least two ways by which the DRP could potentially compensate the LSE.

A-1, Use the CLAP Price:

First, the DRP could be required to pay the LSE the CLAP (now referred to as the Aggregated Pricing Node (APNode)) price for the curtailed load. The **advantage** of this approach is the CLAP price is transparent in the marketplace, so no proprietary agreements are necessary between the LSE and the DRP. The **disadvantage** of this approach is that the DRP simply has no marginal revenue to offer its customers as an incentive to participate, because the PDR is paid the CLAP price, unless it can secure some revenue for the resource adequacy (RA) capacity offered by the participating customers.⁶

A-2, Use the DLAP Price:

The second way by which the DRP could potentially compensate the LSE is if the DRP pays the LSE⁷ the DLAP price for the curtailed load. The **advantages** of this approach are that: (a) The DRP pays the LSE the same amount that the LSE had to pay the CAISO for the curtailed energy; (b) the DRP has some incentive to participate at relatively high-priced CLAP locations because the DRP will receive the revenue based on the CLAP-price and pay the LSE the lower DLAP price. This will enable the DRP to earn a profit and compensate its retail participants; (c) the DLAP price is transparent in the market place, so no proprietary agreements are necessary between the LSE and the DRP. The **disadvantages** of this approach are as follows: (a) the DLAP is an unknown value when bids are due under the market, so the DRP does not know at what price to bid the PDR because it does not know how much the energy will cost it at the time the bids are settled; and (b) the DRP is not even assured that the CLAP price less the DLAP (“the spread”) is a positive value, so the DRP could potentially owe more to the LSE than it gets paid from the CAISO; (c) it is possible that the DRP would have an incentive to bid when the value of “the spread” is high including at potentially *off-peak times* when the market is not in need of

⁶ The DRP would be paying the LSE the entire marginal revenue of its participation and then would bear the additional burden of paying the retail participants for their participation.

⁷ This analysis is also applicable to the situation where it is the *retail participant* who pays the LSE.

additional curtailment, and so the DRPs in that scenario are enriched and there is no economic benefit to society.

B. Compensating the LSE Using the Retail Price

If the *retail* price is used to compensate the LSE, there are at least two ways by which to compensate the LSE.

B-1, Use the Retail Participant's Generation Rate

The first way is for the DRP to pay the LSE the retail participant's generation rate ("G rate") for the load curtailed. The **advantages** are that (a) the LSE receives the retail generation payment for the energy procured from the wholesale market although this payment will likely be less than the DLAP price the LSE paid to CAISO for the curtailed energy; (b) the DRP's energy costs are known to the DRP before its bids are due *as long as* the LSE is willing to share its G rate with the DRP; (c) the PDR would clear the market when it is economical, i.e., when the DRP bids the PDR at a price that is the same or higher than its costs for the PDR. The **disadvantages** are that (a) unregulated LSEs' G rates are potentially proprietary or confidential; (b) the G rate *may* be lower in the off-peak period, which could create an attractive opportunity for the DRP to bid the resource during the *off-peak times* when the market does not need the PDR (a perverse result); (c) if the retail rate is greater than or slightly less than the CLAP/APNode price, there would be no incentive to make PDR available in that area and no revenue to compensate the retail participant for their participation; (d) the G rate may be high, which could prevent the PDR from being dispatched in the market.

Note that if the retail participant, rather than the DRP, pays the LSE using the retail G rate, the analysis in the previous paragraph changes as follows: (a) The first disadvantage above is eliminated because the LSE need not share the G rate with the DRP; the DRP's costs are those that it pays to its retail customers; (b) the DRP credit requirements will be minimal or eliminated because the LSE has a relationship only with the customer, not the DRP; (c) the retail participant would require compensation from the DRP to be greater than the retail G rate in order to be encouraged to participate in a DRP program.

B-2, Use the Retail Participants Total Tariff Rate

The second way is for the DRP to pay the LSE the retail participant's total tariff rate ("T rate") for the load curtailed. The advantages and disadvantages are similar to those for the G rate. In particular, the possibility that the T rate is greater than the CLAP/APNode price may remove any economic incentive to provide PDR to that region and may even cause the economic bid price to exceed the wholesale market cap. As a result, the DRP would not be able to place an economic bid for the PDR into the market (let alone dispatch it into the market).

G. Question 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 or granularity (one hour, five minute), (d) geographic specificity (Default Load Aggregation Point (DLAP), CLAP, other geographic unit).

If the financial settlement uses the wholesale price, the answers are: (a) CAISO Energy
(b) day-ahead; (c) hourly; (d) DLAP or CLAP.

If the financial settlement uses the retail price, the answers are: (a) The tariff, or the customer's contract with its ESP (the G rate); (b) tariff-based or contract-based; (c) hourly; (d) G or T rate.

H. Question 21 - If the financial settlement formula 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 or granularity (one hour, five minute), and (d) geographic specificity (DLAP, CLAP, other geographic unit).

If the financial settlement uses the wholesale price, the answers are:

- (a) PDR baseline reflected in the CAISO tariff – currently specifying a 10 in 10 with +/- 20% Load Point Adjustment (also known as Morning Adjustment)
- (b) DRP/LSE meter data
- (c) One hour
- (d) N/A (unlike energy price, energy quantity has no geographic specificity)

If the financial settlement uses the retail price, the answers are:

- (a) PDR baseline reflected in the CAISO tariff (if settlement is between DRP and LSE), or the customer's individual baseline (if the settlement is between the retail participant and the LSE)
- (b) DRP/LSE meter data
- (c) One hour
- (d) N/A (unlike energy price, energy quantity has no geographic specificity)

I. Question 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).

The financial settlement formula does not involve capacity because there is no CAISO capacity market.

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

Regulated LSEs could be held to CPUC-approved tariffs. As discussed in the responses to Questions 1-5 above, the CPUC could use its tariffs to reach third-party DRPs the same way the CPUC's tariffs reach ESPs. If the settlement process is between the retail participant and its LSE, then the settlement process would take the form of a tariff (for regulated LSEs) or a contract (for unregulated LSEs).

K. Question 24 - What is the appropriate PDR settlement 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?**

Weighing the advantages and disadvantages of the approaches listed in the response to Question 19, SCE concludes preliminarily that if the financial settlement uses the wholesale price, the DLAP is the most appropriate price. If the financial settlement uses the retail price, the G rate is the most appropriate price.

- (b) That DRPs, beyond the IOUs, will have sufficient financial incentives to provide DR in California?**

SCE assumes that this question relates specifically to the financial incentives that third-party DRPs would need to encourage them to remain in California. SCE looks forward to reviewing the responses to this question proffered by the third-party DRPs in this proceeding.

L. Question 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)?

If the settlement is between the LSE and its customers, then well-established billing and payment procedures already exist, and the LSE would need only to add the curtailment component to the bill.

If the settlement is between the LSE and the DRP, then the form and payment procedure should mimic the existing forms established for DR aggregators in IOU DR Contract programs or utilize the Electronic Funds Transfer process in place for ESPs.

M. Question 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?

SCE recommends that PDR transactions be netted and summed on a monthly basis. Payment for the period's net PDR should be received within 17 days after the end of a billing period.

N. Question 27 - What venue and procedures should be used to address and resolve disputes about settlement procedures and transactions?

To address and resolve disputes about settlement procedures and transactions, the parties should use the same venues and procedures that retail customers, ESPs, and/or DR aggregators use to support retail transactions.

- O. Question 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?**

The parties participating in CAISO's PDR market should be subject to credit requirements similar to those to which retail customers are subject, because the credit risks are similar. If the credit is between DRPs and LSEs, then the DRPs need to post credit or collateral.

- P. Question 29 - Are there any items not mentioned above that should be included in a settlement system/protocol?**

No.

- Q. Question 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 parties' comments regarding why, for PDR or other CAISO products, it might be more appropriate to use the CAISO PDR baseline.**

Both the retail baseline specified by the CPUC, and the PDR baseline specified by CAISO, utilize a 10-in-10 with Load Point Adjustment. The CAISO PDR baseline requires the coincident performance of the aggregate PDR, which is appropriate for quantifying the aggregate performance of the PDR. The CPUC baseline is based on the actions of each retail participant individually and independently, which is appropriate for retail settlement with customers.

- R. Question 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 DRPs will need to obtain at least the following information from the LSE or UDC:

- Customer Service Account
- Customer location
- Customer usage history
- Current and future customer usage
- pNode associated with the customer

- SLAP associated with the customer
- Whether customer has metering with the required interval data (5 min, 15 min, 1 hour)

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

SCE considers all of the above information confidential. The DRP will need to file a Customer Information Service Request (CISR) with approval from the customer, or an equivalent form, in order for the DRP to gain access to confidential customer information.

S. Question 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?

As indicated in the reply to question 31(a), the first step is to provide a CISR or its equivalent. In addition, the ESP Establishment and Enrollment Forms⁸ provide some insight into the information that should be required from ESPs. Similar items may be needed from DRPs:

- Participant Information Form (PIF)
- SCE-ESP Service Agreement
- ESP Credit Application
- Related Security Forms:
 - Assignment of Certificate of Deposit
 - Notice of Assignment
 - Irrevocable Documentary Letter of Credit
 - Surety Bond
 - Corporate Guaranty Agreement
- Electronic Data Interchange (EDI) Trading Partner Agreement
- Electronic Data Interchange (EDI) Partner Profile Form for Data

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

It is assumed that the information would be either proprietary or confidential, which is the reason why an SCE-ESP Service Agreement is required to establish the Terms and Conditions for the business relationship.

⁸ <http://www.sce.com/b-db/esp/forms.htm>

T. Question 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 roles of the Meter Service Provider (MSP) and Meter Data Management Agent (MDMA) must be taken into account. In order to establish baselines and provide settlement data for PDR resources, the DRP will need to have access to meter data for that service account. In addition, that service account must have the meter data resolution required for the market into which the DRP is bidding the PDR. In order to ensure that the data for both the LSE and DRP are consistent, the DRP will need to utilize the same MSP and MDMA that is utilized by the LSE. Otherwise, there will likely be disputes over accuracy or discrepancies between meter reads by two different MDMAs.

A. Meter Service Provider (MSP):

Under Direct Access, ESPs have the option of providing metering services to customers to whom they provide electricity. These services include the provision of the meter, ownership of the meter, meter testing for adherence to the Direct Access Standards for Metering and Meter Data (DASMMD), meter installation, meter calibration, meter testing for proper installation and functionality, and meter maintenance.

ESPs can provide any or all of the following metering services options to their customers:

- Meter Ownership services
- Meter Services—installing, maintaining and testing meters
- Meter Data Management Agent (MDMA) services—reading meters and reporting meter usage data.

B. Meter Data Management Agent (MDMA):

MDMA services are to be provided by the IOU or an ESP. The ESP may subcontract the MDMA services to a third party or the ESP may subcontract with the IOU to provide such services. If the ESP subcontracts the MDMA services to a third party, it is the ESP who remains responsible for the MDMA services.

Meter data management agent services include:

- Managing meter reading schedules
- Reading and retrieving meter data
- Validating, editing and estimating meter data
- Calculating usage
- Formatting data
- Storing data on MDMA's computer server
- Managing data on the MDMA's computer server
- Managing access to data on server
- Managing meter/device records

U. Question 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".

According to CAISO's payment acceleration calendar, meter data must be provided as follows:

- TD+5d (estimated data OK)
- TD+43d (Settlement Quality Meter Data (SQMD))
- TD+61d

V. Question 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?

To try to prevent any breakdown in communications between parties, it would be necessary to develop and establish a new Rule and Handbook specifically for DRP. Rule 22 for DA and Rule 23 for CCA provide specific terms and conditions that apply to SCE, the ESPs and the CCAs, respectively; the ESP and CCA Handbooks have been in place and continue to serve as the operational guidelines. They establish a Service Level Agreement for providing the various services. It should be noted that the Direct Access services provided to ESPs do incur fees for the ESPs.² Similarly, services provided to the DRPs should be assessed to ensure that bundled ratepayers are not subsidizing the cost of doing business for the DRP.

² See D.08-05-003

W. Question 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.

It should be noted that the rows without yellow highlighting received stakeholder agreement during the December 2009 DR IOR Phase IV workshops. The rows containing yellow highlighting warrant further discussion by stakeholders.

Also, similar to DA, the establishment process would require the DRPs to submit the SCE-DRP Service Agreement to SCE for review and execution.

INFORMATION	FROM WHO	TO WHO	WHEN
SCE-DRP Service Agreement	DRP	UDC	Registration

X. Question 37 - Will any part of the PDR processes require provision of ESP’s 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.

The confidential information exchange would include data that is already required to facilitate DA and CCA. Customer information such as Installed Service Location, Meter Number, Customer Service Number, and other customer specifics are required to facilitate enrollment and ensure that the same customer is not inadvertently or improperly enrolled in two or more DR programs. Customer load data is required by the DRP in order to determine the DR potential, and to calculate DR baselines and performance as required by CAISO. However, ESP or DRP customer rates or bills would not be needed by other parties. (Note, however, that IOU rates are public information but individual customer bills are confidential.)

Y. Question 38 - Are there any items not mentioned above that should be included in the communications protocols?

No.

Z. Question 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.

Not requiring a financial settlement between DRPs and LSEs would not change the information exchange outlined in question 37, because, in addition to supporting a financial settlement between DRPs and LSEs, the data exchange outlined above is required to support DRP settlements with CAISO and with the DRP's retail participants. The data is required for the DRP to operate and settle with its financial counterparts. The addition or elimination of one counterpart does not add or remove the fundamental data required to operate.

III.

CONCLUSION

SCE appreciates this opportunity to provide comments on ALJ Farrar's thoughtful questions in advance of the Phase IV workshops at which the parties will discuss these issues in more detail.

Respectfully submitted,

JENNIFER T. SHIGEKAWA
FADIA RAFEEDIE KHOURY

/s/ FADIA RAFEEDIE KHOURY

By: Fadia Rafeedie Khoury

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6008
Facsimile: (626) 302-7740
E-mail: fadia.khoury@sce.com

December 13, 2010

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 **COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON QUESTIONS 1-5 AND 19-39 OF ADMINISTRATIVE LAW JUDGE FARRAR'S RULING SOLICITING RESPONSES ON REMAINING DIRECT PARTICIPATION ISSUES (PHASE IV, PART 2)** 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 **13th day of December, 2010**, at Rosemead, California.

/s/ HENRY ROMERO

Henry Romero

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: R0701041 - CPUC-PG&E, SDG&E, ED
filer: CPUC-PG&E, SDG&E, EDISON
LIST NAME: LIST
LAST CHANGED: NOVEMBER 23, 2010

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

[Back to Service Lists Index](#)

Parties

MARTIN HOMECH
 CALIFORNIANS FOR RENEWABLE ENERGY, INC.
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: CALIFORNIA FOR RENEWABLE ENERGY,
 INC.

SUE MARA
 RTO ADVISORS, LLC.
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: RTO ADVISORS, LLC

SCOTT H. DEBROFF
 RHOADS & SINON LLP
 ONE SOUTH MARKET SQUARE, PO BOX 1146
 HARRISBURG, PA 17108-1146
 FOR: ELSTER INTEGRATED SOLUTIONS;
 CELLNET & TRILLIANT NETWORKS, INC.;
 CONSUMER POWERLINE AND ANCILLIARY
 SERVICES COALITION.

KEITH R. MCCREA
 ATTORNEY AT LAW
 SUTHERLAND, ASBILL & BRENNAN, LLP
 1275 PENNSYLVANIA AVE., N.W.
 WASHINGTON, DC 20004-2415
 FOR: CA MANUFACTURERS & TECHNOLOGY ASSN.

KEN SKINNER
 VICE PRESIDENT, COO
 INTEGRAL ANALYTICS, INC
 312 WALNUT STREET, SUITE 1600
 CINCINNATI, OH 45202

JAMES R. METTLING
 BLUE POINT ENERGY LLC
 20 INDUSTRIAL PARKWAY
 CARSON CITY, NV 89706
 FOR: BLUE POINT ENERGY

STEVEN D. PATRICK
 SAN DIEGO GAS AND ELECTRIC COMPANY
 555 WEST FIFTH STREET, SUITE 1400
 LOS ANGELES, CA 90013-1011
 FOR: SAN DIEGO GAS & ELECTRIC COMPANY

GREGORY KLATT
 ATTORNEY AT LAW
 DOUGLASS & LIDDELL
 411 E. HUNTINGTON DRIVE, STE. 107-356
 ARCADIA, CA 91006
 FOR: DIRECT ACCESS CUSTOMER COALITION

DANIEL W. DOUGLASS
 DOUGLASS & LIDDELL

JANET COMBS
 SR. ATTORNEY

21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367
FOR: ALLIANCE FOR RETAIL ENERGY
MARKETS/WESTERN POWER TRADING FORUM

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

DONALD C. LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
FOR: WAL-MART STORES, INC./ICE
ENERGY/KINDER MORGAN / CALIF. ENERGY
STORAGE ALLIANCE

DOUGLAS A. AMES
ATTORNEY AT LAW
TRANSPHASE SYSTEMS, INC.
4971 LOS PATOS AVENUE
HUNTINGTON BEACH, CA 92649
FOR: TRANSPHASE

JACK ELLIS
PRINCIPAL CONSULTANT
RESERO CONSULTING
490 RAQUEL COURT
LOS ALTOS, CA 94022
FOR: ENERGY CONNECT, INC.

LISA-MARIE SALVACION
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DIVISION OF RATEPAYERS ADVOCATES

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

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

NORA SHERIFF
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105
FOR: ENERGY PRODUCERS & USERS COALITION

RICHARD H. COUNIHAN
SR. DIRECTOR CORPORATE DEVELOPMENT
ENERNOC, INC.
500 HOWARD ST., SUITE 400
SAN FRANCISCO, CA 94105
FOR: ENERNOC, INC.

SHIRLEY WOO
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC

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

JEFFREY P. GRAY
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
FOR: SOUTH SAN JOAQUIN IRRIGATION
DISTRICT

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

SARA STECK MYERS
ATTORNEY AT LAW
122 28TH AVENUE
SAN FRANCISCO, CA 94121
FOR: JOINT PARTIES. ENERNOC, INC.

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

AVIS KOWALEWSKI
CALPINE CORPORATION
4160 DUBLIN BLVD, SUITE 100
DUBLIN, CA 94568
FOR: CALPINE CORPORATION

ERIC C. WOYCHIK
STRATEGY INTEGRATION LLC
9901 CALODEN LANE
OAKLAND, CA 94605
FOR: COMVERGE, INC.

JAMES BOOTHE
THE ENERGY COALITION
9 REBELO LANE
NOVATO, CA 94947

RICH QUATTRINI
VICE PRESIDENT - WESTERN REGION
ENERGYCONNECT, INC.
901 CAMPISI WAY, SUITE 260

FOR: THE ENERGY COALITION

CAMPBELL, CA 95008-2348
FOR: ENERGY CONNECT, INC.

BOB HINES
ENERGY PROGRAMS
SILICON VALLEY LEADERSHIP GROUP
224 AIRPORT PARKWAY, SUITE 620
SAN JOSE, CA 95110
FOR: SILICON VALLEY LEADERSHIP GROUP

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
FOR: CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION

BALDASSARO DI CAPO
COUNSEL
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA INDEPENDENT SYSTEM
OPERATOR

LAUREN NAVARRO
ATTORNEY
ENVIRONMENTAL DEFENSE FUND
1107 9TH STREET, SUITE 540
SACRAMENTO, CA 95814
FOR: ENVIRONMENTAL DEFENSE FUND

KAREN N. MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
FOR: CALIFORNIA FARM BUREAU FEDERATION

Information Only

ATHENA BESA
SAN DIEGO GAS & ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000

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

EDWARD VINE
LAWRENCE BERKELEY NATIONAL LABORATORY
EMAIL ONLY
EMAIL ONLY, CA 00000

TIMOTHY N. TUTT
SACRAMENTO MUNICIPAL UTILITIES DISTRICT
EMAIL ONLY
EMAIL ONLY, CA 00000

TODD S. GLASSEY
EMAIL ONLY
EMAIL ONLY, CA 00000

CERTICHRON INC.
EMAIL ONLY
EMAIL ONLY, CA 00000

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

SHELLY-ANN MAYE
NORTH AMERICA POWER PARTNERS
308 HARPER DRIVE, SUITE 320
MOORESTOWN, NJ 08057

CLARK E. PIERCE
LANDIS & GYR
246 WINDING WAY
STRATFORD, NJ 08084

NICHOLAS J. PLANSON
CONSUMER POWERLINE
17 STATE STREET, SUITE 1910
NEW YORK, NY 10004
FOR: CONSUMER POWERLINE

MARIE PIENIAZEK
1328 BOZENKILL ROAD
DELANSON, NY 12053

WILLIAM CHEN, ESQ.
CORPORATE COUNSEL
ENERGY CURTAILMENT SPECIALISTS, INC.
4455 GENESEE STREET, BLDG. 6
NEW YORK, NY 14225

GLEN E. SMITH
PRESIDENT AND CEO
ENERGY CURTAILMENT SPECIALISTS, INC.
PO BOX 610

ALICIA R. PETERSEN
RHODES & SINON LLP
ONE SOUTH MARKET SQUARE, PO BOX 1146
HARRISBURG, PA 17108

CHEEKTOWAGA, NY 14225-0610

MONICA S. IINO
RHOADS & SINON LLP
M&T BUILDING
ONE SOUTH MARKET SQUARE, PO BOX 1146
HARRISBURG, PA 17108

CLINTON COLE
CURRENT GROUP, LLC
20420 CENTURY BOULEVARD
GERMANTOWN, MD 20874

GRAYSON HEFFNER
15525 AMBIANCE DRIVE
N. POTOMAC, MD 20878

STEPHEN D. BAKER
SR. REG. ANALYST, FELLOW-MCCORD AND ASS.
CONSTELLATION NEW ENERGY-GAS DIVISION
9960 CORPORATE CAMPUS DRIVE, SUITE 2500
LOUISVILLE, KY 40223

TRENT A. CARLSON
RRI ENERGY, INC.
1000 MAIN STREET
HOUSTON, TX 77001

DANIEL M. VIOLETTE
SUMMIT BLUE CONSULTING
1722 14TH STREET, SUITE 230
BOULDER, CO 80302

KEVIN COONEY
PRINCIPAL/CEO
SUMMIT BLUE CORPORATION
1722 14TH STREET, SUITE 230
BOULDER, CO 80302

STUART SCHARE
SUMMIT BLUE CONSULTING
1722, 14TH STEET, SUIET 230
BOULDER, CO 80302
FOR: SUMMIT BLUE CONSULTING

LARRY B. BARRETT
CONSULTING ASSOCIATES, INC.
PO BOX 60429
COLORADO SPRINGS, CO 80960

WILLIAM D. ROSS
CONSTELLATION NEW ENERGY
520 SO. GRAND AVENUE SUITE 3800
LOS ANGELES, CA 90071-2610
FOR: CONSTELLATION NEW ENERGY

DAVID NEMTZOW
NEMTZOW & ASSOCIATES
1254 9TH STREET, NO. 6
SANTA MONICA, CA 90401

JAY LUBOFF
JAY LUBOFF CONSULTING SERVICES
1329 19TH ST, APT D
SANTA MONICA, CA 90404-1946

DAVID REED
SOUTHERN CALIFORNIA EDISON
6060 IRWINDALE AVE., STE. J
IRWINDALE, CA 91702

JOYCE LEUNG
SOUTHERN CALIFORNIA EDISON COMPANY
6060 J IRWINDALE AVE.
IRWINDALE, CA 91702

MARIAN BROWN
SOUTHERN CALIFORNIA EDISON
6040A IRWINDALE AVE.
IRWINDALE, CA 91702

MARK S. MARTINEZ
SOUTHERN CALIFORNIA EDISON
6060 IRWINDALE AVE., SUITE J
IRWINDALE, CA 91702

ANDREA HORWATT
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

CARL SILSBEE
SOUTHERN CALIFORNIA EDISON
G01, RP&A
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

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

FADIA KHOURY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

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

KA-WING MAGGIE POON
G01, QUAD 2B
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

LARRY R. COPE
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON
PO BOX 800, 2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON

OLIVIA SAMAD
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

RUSS GARWACRD
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE
ROSEMEAD, CA 91770

NGUYEN QUAN
MGR - REGULATORY AFFAIRS
GOLDEN STATE WATER COMPANY
630 EAST FOOTHILL BOULEVARD
SAN DIMAS, CA 91773
FOR: GOLDEN STATE WATER COMPANY

DON WOOD
PACIFIC ENERGY POLICY CENTER
4539 LEE AVENUE
LA MESA, CA 91941

DAVID BARKER
SAN DIEGO GAS & ELECTRIC COMPANY
8306 CENTURY PARK COURT
SAN DIEGO, CA 92123

KATHRYN SMITH
SAN DIEGO GAS AND ELECTRIC COMPANY
8306 CENTURY PARK COURT
SAN DIEGO, CA 92123

LISA DAVIDSON
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32A
SAN DIEGO, CA 92123

LINDA WRAZEN
REGULATORY CASE ADMINISTRATOR
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123-1530

REGULATORY AFFAIRS
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT-CP31E
SAN DIEGO, CA 92123-1530

JOY C. YAMAGATA
SAN DIEGO GAS & ELECTRIC/SOCALGAS
8330 CENTURY PARK COURT, CP 32 D
SAN DIEGO, CA 92123-1533

DAVE HANNA
ITRON INC
11236 EL CAMINO REAL
SAN DEIGO, CA 92130-2650

GEOFF AYRES
THE ENERGY COALITION
15615 ALTON PARKWAY, SUITE 245
IRVINE, CA 92618

WARREN MITCHELL
THE ENERGY COALITION
15615 ALTON PARKWAY, SUITE 245
IRVINE, CA 92618

DAVID M. WYLIE, PE
ASW ENGINEERING
2512 CHAMBERS ROAD, SUITE 103
TUSTIN, CA 92780

JOEL M. HVIDSTEN
KINDER MORGAN ENERGY FORECASTER
1100 TOWN & COUNTRY ROAD, SUITE 700
ORANGE, CA 92868

SHAWN COX
KINDER MORGAN ENERGY FORECASTER
1100 TOWN & COUNTRY ROAD, SUITE 700
ORANGE, CA 92868

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

PAUL KERKORIAN
UTILITY COST MANAGEMENT LLC
6475 N. PALM AVENUE, SUITE 105
FRESNO, CA 93704

CHRIS KING
EMETER CORPORATION
2215 BRIDGEPOINTE PARKWAY, SUITE 300
SAN MATEO, CA 94044

PAUL KARR
TRILLIANT NETWORKS, INC.
1100 ISLAND DRIVE, SUITE 103
REDWOOD CITY, CA 94065

SHARON TALBOTT
EMETER CORPORATION
ONE TWIN DOLPHIN DRIVE
REDWOOD CITY, CA 94065

THERESA MUELLER
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO

MASSIS GALESTAN
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION

CITY HALL, ROOM 234
SAN FRANCISCO, CA 94102

AREA 4-A
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

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

DANIEL C. ENGEL
SENIOR CONSULTANT
FREEMAN, SULLIVAN & CO.
101 MONTGOMERY STREET, 15TH FLOOR
SAN FRANCISCO, CA 94104

ELAINE S. KWEI
PIPER JAFFRAY & CO
345 CALIFORNIA ST. SUITE 2300
SAN FRANCISCO, CA 94104

SNULLER PRICE
ENERGY AND ENVIRONMENTAL ECONOMICS
101 MONTGOMERY, SUITE 1600
SAN FRANCISCO, CA 94104

STEVE GEORGE
GSC GROUP
101 MONTGOMERY STREET, 15TH FLOOR
SAN FRANCISCO, CA 94104

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

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

KEN ABREN
245 MARKET STREET
SAN FRANCISCO, CA 94105

LISE H. JORDAN, ESQ.
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A. RM 3151
SAN FRANCISCO, CA 94105

MARK R. HUFFMAN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET / PO BOX 7442 (B30A)
SAN FRANCISCO, CA 94105

MICHAEL P. ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105

STEVEN R. HAERTLE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

ALICE LIDDELL
ICF INTERNATIONAL
620 FOLSOM STREET, STE, 200
SAN FRANCISCO, CA 94107

STEVEN MOSS
SAN FRANCISCO COMMUNITY POWER
2325 THIRD STREET, STE 344
SAN FRANCISCO, CA 94107

AHMAD FARUQUI
THE BRATTLE GROUP
353 SACRAMENTO STREET, SUITE 1140
SAN FRANCISCO, CA 94111

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: NORTH AMERICA POWER PARTNERS LLC

BRYCE DILLE
CLEAN TECHNOLOGY RESEARCH
JMP SECURITIES
600 MONTGOMERY ST. SUITE 1100
SAN FRANCISCO, CA 94111

J. JOSHUA DAVIDSON
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111

RAFI HASSAN
SUSQUEHANNA FINANCIAL GROUP, LLLP
101 CALIFORNIA STREET, SUITE 3250

ROBERT GEX
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800

SAN FRANCISCO, CA 94111

SETH D. HILTON
STOEL RIVES, LLP
555 MONTGOMERY ST., SUITE 1288
SAN FRANCISCO, CA 94111

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

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

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

ROBIN J. WALTHER, PH.D.
1380 OAK CREEK DRIVE., 316
PALO ALTO, CA 94305

CLARK BERNIER
RLW ANALYTICS
961 CAPITOLA DR
NAPA, CA 94559-3579

MARK J. SMITH
CALPINE CORPORATION
4160 DUBLIN BLVD., SUITE 100
DUBLIN, CA 94568

PHILIPPE AUCLAIR
11 RUSSELL COURT
WALNUT CREEK, CA 94598

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

DOCKET COORDINATOR
5727 KEITH ST.
OAKLAND, CA 94618

STEVE KROMER
SKEE
3110 COLLEGE AVENUE, APT 12
BERKELEY, CA 94705
FOR: STEVE KROMER

SAN FRANCISCO, CA 94111

SALLE E. YOO
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

CHARLES R. MIDDLEKAUFF
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
FOR: PACIFIC GAS AND ELECTRIC COMPANY

MARY A. GANDESBERY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442, MC B30A-3005
SAN FRANCISCO, CA 94120-7442

MARK HUFFMAN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
MC B30A PO BOX 770000
SAN FRANCISCO, CA 94177
FOR: PACIFIC GAS AND ELECTRIC COMPANY

MICHAEL ROCHMAN
MANAGING DIRECTOR
SPURR
1850 GATEWAY BLVD., SUITE 235
CONCORD, CA 94520

SEAN P. BEATTY
SR. MGR. EXTERNAL & REGULATORY AFFAIRS
MIRANT CALIFORNIA, LLC
696 WEST 10TH ST., PO BOX 192
PITTSBURG, CA 94565

JOE PRIJYANONDA
GLOBAL ENERGY PARTNERS, LLC
500 YGNACIO VALLEY RD., STE 450
WALNUT CREEK, CA 94596-3853

ALEX KANG
ITRON, INC.
1111 BROADWAY, STE. 1800
OAKLAND, CA 94607

TED POPE
PRESIDENT
ENERGY SOLUTIONS
1610 HARRISON STREET
OAKLAND, CA 94612

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
BERKELEY, CA 94703-2714

GALEN BARBOSE
LAWRENCE BERKELEY NATIONAL LAB
MS 90-4000
1 CYCLOTRON RD.
BERKELEY, CA 94720

ALAN GARTNER
ENERGYCONNECT, INC.
901 CAMPISI WAY, SUITE 260
CAMPBELL, CA 95008-2348

MAHLON ALDRIDGE
ECOLOGY ACTION
PO BOX 1188
SANTA CRUZ, CA 95061-1188

L. JAN REID
COAST ECONOMIC CONSULTING
3185 GROSS ROAD
SANTA CRUZ, CA 95062

ALAN GARTNER
1125 PHEASANT HILL WAY
SAN JOSE, CA 95120

JEFF SHIELDS
UTILITY SYSTEMS DIRECTOR
SOUTH SAN JOAQUIN IRRIGATION DISTRICT
11011 E. HWY 120
MANTECA, CA 95336

JOY A. WARREN
REGULATORY ADMINISTRATOR
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

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

THOMAS S. KIMBALL
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

JAMES WEIL
DIRECTOR
AGLET CONSUMER ALLIANCE
PO BOX 1916
SEBASTOPOL, CA 95473

GAYATRI SCHILBERG
JBS ENERGY
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95605
FOR: TURN

JEFF NAHIGIAN
JBS ENERGY, INC.
311 D STREET
WEST SACRAMENTO, CA 95605

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

DAVID E. MORSE
217 F STREET, NO. 53
DAVIS, CA 95616

RICHARD MCCANN
M.CUBED
2655 PORTAGE BAY ROAD, SUITE 3
DAVIS, CA 95616

JOHN GOODIN
CALIFORNIA ISO
151 BLUE RAVINE RD.
FOLSOM, CA 95630

MELANIE GILLETTE
DIR - 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

LEGAL AND REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

MARY LYNCH
CONSTELLATION ENERGY COMMODITIES GRP
2377 GOLD MEADOW WAY, STE 100
GOLD RIVER, CA 95670

LON W. HOUSE, PH.D
ASSOCIATION OF CAL WATER AGENCIES
4901 FLYING C RD.
CAMERON PARK, CA 95682

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
2602 CELEBRATION WAY
WOODLAND, CA 95776
FOR: ENERGY USERS FORUM

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

DAVID HUNGERFORD
CALIFORNIA ENERGY COMMISSION

MARGARET SHERIDAN
CALIFORNIA ENERGY COMMISSION

DEMAND ANALYSIS OFFICE
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814

DEMAND ANALYSIS OFFICE
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814

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

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON SCHNEIDER & HARRIS, LLP (1359)
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905

VIKKI WOOD
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6301 S STREET, MS A204
SACRAMENTO, CA 95817-1899

BARB BOICE
4309 NORWOOD AVENUE, APT. 160
SACRAMENTO, CA 95838

KAREN LINDH
CALIFORNIA ONSITE GENERATION
7909 WALERGA ROAD, NO. 112, PMB 119
ANTELOPE, CA 95843

ROGER LEVY
LEVY AND ASSOCIATES
2805 HUNTINGTON ROAD
SACRAMENTO, CA 95864

ANNIE STANGE
ALCANTAR & KAHL LLP
1300 SW FIFTH AVE., SUITE 1750
PORTLAND, OR 97201

BENJAMIN SCHUMAN
PACIFIC CREST SECURITIES
111 SW 5TH AVE, 42ND FLR
PORTLAND, OR 97204

JENNIFER HOLMES
ENERGY MARKET INNOVATIONS INC.
83 COLUMBIA STREET, SUITE 303
SEATTLE, WA 98104

TYLER BERGAN
POWERIT SOLUTIONS
568 1ST AVE. S., STE. 450
SEATTLE, WA 98104-2843

State Service

DONALD J. BROOKS
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

JOY MORGENSTERN
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

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

ANDREW CAMPBELL
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

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

DARWIN FARRAR
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5041
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DORRIS LAM
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A

ELIZABETH DORMAN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

JESSICA T. HECHT
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5113
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOE COMO
CALIF PUBLIC UTILITIES COMMISSION
DRA - ADMINISTRATIVE BRANCH
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KARL MEEUSEN
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5217
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

LISA ORSABA
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4104
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

PAMELA NATALONI
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5124
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

REBECCA TSAI-WEI LEE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

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

TIMOTHY J. SULLIVAN
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 2106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CLARE LAUFENBER GALLARDO
STRATEGIC TRANSMISSION INVESTMNT PROGRAM
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 17
SACRAMENTO, CA 95814

TOP OF PAGE

[BACK TO INDEX OF SERVICE LISTS](#)