



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Continue)
Implementation and Administration of California)
Renewables Portfolio Standard Program.)
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Rulemaking 08-08-009
(Filed August 21, 2008)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON
PROPOSED DECISION CONDITIONALLY ACCEPTING 2011 RENEWABLES
PORTFOLIO STANDARD PROCUREMENT PLANS AND INTEGRATED RESOURCE
PLAN SUPPLEMENTS**

PUBLIC VERSION

MICHAEL D. MONTOYA
CATHY A. KARLSTAD

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-1096
Facsimile: (626) 302-1935
E-mail: Cathy.Karlstad@sce.com

Dated: March 3, 2011

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) COMMENTS ON
PROPOSED DECISION CONDITIONALLY ACCEPTING 2011 RENEWABLES
PORTFOLIO STANDARD PROCUREMENT PLANS AND INTEGRATED
RESOURCE PLAN SUPPLEMENTS**

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PROCUREMENT PLANS AND INTEGRATED RESOURCE PLAN SUPPLEMENTS**

Pursuant to Rule 14.3(a) of the Rules of Practice and Procedure of the California Public Utilities Commission (“CPUC”), Southern California Edison Company (“SCE”) respectfully submits these comments on the Proposed Decision Conditionally Accepting 2011 Renewables Portfolio Standard (“RPS”) Procurement Plans and Integrated Resource Plan Supplements (“PD”).

I.

INTRODUCTION

SCE appreciates the PD’s stated approach to the investor-owned utilities’ (“IOUs”) RPS Procurement Plans. The PD restates the CPUC’s presumption “that each utility may apply its own reasonable business judgment in running its solicitation,” and notes that the CPUC does not micromanage the IOUs’ RPS Procurement Plans or procurement processes.¹ Consistent with these statements, the CPUC should modify the PD to allow each IOU to implement its own contractual provisions for addressing economic curtailment and the risks associated with negative pricing caused by transmission congestion and over-generation in the California Independent System Operator (“CAISO”) markets. The CPUC should not require all IOUs to include pro forma economic curtailment provisions equivalent to those proposed by Pacific Gas and Electric Company (“PG&E”). Based on input from market participants, SCE has revised its economic curtailment provisions to reasonably balance economic curtailment risk between sellers and customers, protect customers from unbounded exposure

¹ PD at 3, 10.

to negative pricing, and provide a certain revenue stream to sellers to eliminate financing concerns. Many sellers have since demonstrated that SCE's revised economic curtailment provisions are commercially acceptable by executing contracts including the language. Accordingly, the CPUC should revise the PD to eliminate the requirement that all IOUs include PG&E's economic curtailment provisions in their pro forma contracts. Similarly, the CPUC should adopt SCE's proposal to require sellers to elect interconnections providing for full deliverability. This full deliverability requirement will mitigate customers' exposure to negative pricing resulting from congestion and over-generation in the CAISO markets, and will also support the development of a grid that can accommodate the renewable generation needed to meet the State's renewable energy goals. However, the CPUC should not require the IOUs to provide congestion cost information as part of their RPS Procurement Plans starting in 2012, since such information is already made public by the CAISO, and the IOUs are not the appropriate entities to provide congestion cost information.

Furthermore, the CPUC should revise the PD to allow the IOUs to use non-zero integration cost adders for renewable resources in their evaluation processes. The CPUC-mandated use of a zero adder is inconsistent with the actual costs of integrating renewable resources and leads to suboptimal contract selection. The CPUC should approve SCE's pilot program for pre-approval of short-term renewable transactions. A streamlined process is necessary to allow the IOUs to compete for fleeting, short-term transactions, and the CPUC's existing fast-track approval process is not commercially workable. Additionally, the CPUC should remove the PD's suggestions that the IOUs pursue one standardized IOU solicitation contract. The IOUs' existing contracting processes are working effectively and there is no benefit to expending time and resources to develop a standard contract for all IOUs. The CPUC should also adopt SCE's proposed changes to the project viability calculator.

Finally, SCE intends to amend its RPS Procurement Plan to provide that projects must have at least completed a Phase 1 (or equivalent) interconnection study to be eligible for shortlisting in SCE's 2011 RPS solicitation. This will limit the pool of offers to projects SCE views as more viable, provide more certainty regarding potential network upgrade and interconnection costs, and allow for a more accurate evaluation process. Given the long delay in approval of the 2010 RPS Procurement Plans, such amendment should be permitted.

II.

THE CPUC SHOULD APPROVE SCE'S ECONOMIC CURTAILMENT PROVISIONS

SCE has no interest in having the output of renewable projects curtailed unless it is absolutely necessary to avoid harm to its customers. As the PD acknowledges, however, the CAISO's recently implemented Market Redesign and Technology Upgrade ("MRTU") changed the way generation resources are scheduled and dispatched; in particular, MRTU uses locational marginal prices ("LMPs") as "price signals reflecting electricity supply and demand in multiple locations."² With increasing amounts of renewable resources interconnecting to the grid and the need for extensive transmission upgrades, transmission congestion and over-generation are real possibilities. Under MRTU, negative LMPs can be a signal of congestion or over-generation. Without the ability to curtail the output of a renewable facility, the purchasing IOU's customers face practically unlimited price risk from negative LMPs. Therefore, reasonable economic curtailment provisions are necessary and appropriate to protect customers from unreasonable cost exposure, and to ensure the CAISO's job of balancing the grid is not made more difficult by completely insulating generators from the CAISO's market signals.

The PD agrees that "RPS contracts must reasonably reflect the CAISO's new economic approach" by including provisions for economic curtailment, and recognizes that "[f]ailure to do so could undermine the ability of MRTU to optimally use price signals" for scheduling, dispatch, and project location.³ Rather than allowing each IOU to use its business judgment to implement economic curtailment provisions, however, the PD mandates that all three IOUs use the same approach to economic curtailment and include pro forma provisions equivalent to those proposed by PG&E.⁴ PG&E's economic curtailment provisions are essentially "take or pay." PG&E's customers pay the seller the full contract price for all curtailed energy.⁵ Moreover, even though the seller receives the full contract price for any curtailed energy, economic curtailment is limited to five percent of the project's expected annual generation per year.⁶

² *Id.* at 12.

³ *Id.* at 16.

⁴ *Id.* at 16, 49 (COL 8).

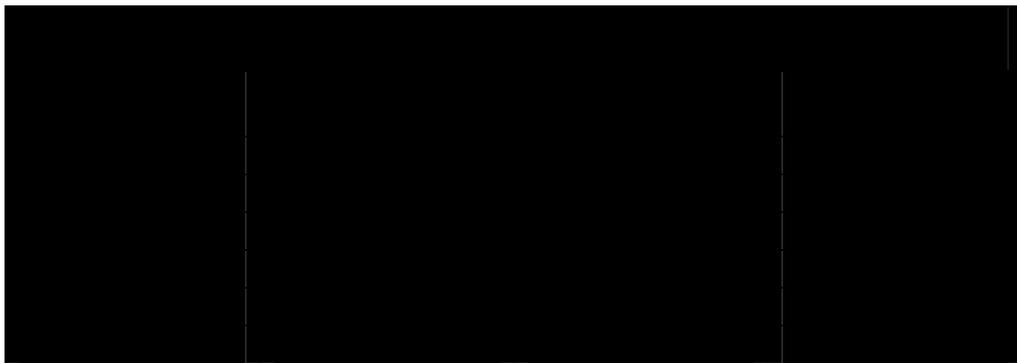
⁵ *Id.* at 14.

⁶ *Id.* PG&E does not reimburse the seller for any lost production tax credits ("PTCs"). *Id.*

The PD's only reasoning for requiring all IOUs to include PG&E's economic curtailment provisions in their pro forma contracts is that PG&E's "is the simpler of the two proposals presented."⁷ The PD also notes that some parties representing renewable developers opposed SCE's proposal as "too complex."⁸ SCE's economic curtailment provisions are not complicated.

SCE initially proposed economic curtailment language that some renewable developers believed would cause problems in financing their projects. After receiving that input, SCE worked with market participants on revising its economic curtailment provisions to work for all parties. To address renewable developers' financing concerns, SCE capped the amount of uncompensated economic curtailment under its provisions. SCE's revised economic curtailment provisions are quite simple. SCE can only economically curtail a generator without compensation up to a pre-determined, negotiated cap. The generator will be compensated for all energy economically curtailed beyond that curtailment cap at the contract price (including lost PTCs), providing generators with a certain revenue stream and eliminating financing concerns. At the end of the contract term, SCE has the option to buy twice the amount of energy curtailed throughout the contract term, above the cap, at half the contract price for up to two years, returning the renewable energy to customers that they paid for but did not receive.

There is ample evidence that SCE's revised economic curtailment provisions are commercially acceptable to the market. As indicated in the table below, SCE has executed 31 contracts which contain its revised economic curtailment provisions for almost 1,400 MW of new renewable capacity.⁹



⁷ *Id.* at 16.

⁸ *Id.* at 15.

⁹





Further, SCE’s revised economic curtailment provisions are far superior to PG&E’s in protecting customers from the risks associated with economic curtailment. While the PD asserts that PG&E’s economic curtailment provisions satisfy important goals such as “sharing congestion cost risk between developers and ratepayers,”¹⁰ SCE strongly disagrees. Under PG&E’s curtailment provisions, *customers bear the entire risk of economic curtailment*. There is no sharing of the congestion cost risk between sellers and customers because customers pay the full contract price for all curtailed energy. Additionally, customers are not protected from the risk of severe and persistent negative pricing in the CAISO markets. Although sellers receive the full contract price for any curtailed energy, PG&E’s economic curtailment provisions still cap economic curtailment at five percent of the expected annual energy deliveries. Accordingly, if the CAISO markets experience persistent deep negative prices, there would be no way to limit customers’ exposure to negative price risk after this five percent cap is expended. SCE’s customers could be forced to pay full contract price, plus potentially hundreds or even thousands of dollars per MWh to the CAISO to dispose of the renewable energy.

Additionally, sellers have significant ability to influence the risk of economic curtailment since they select project location, size, interconnection type, and generator technology. One of the benefits of LMP pricing under MRTU is giving price signals that influence project location.¹¹ Under PG&E’s curtailment provisions, however, these price signals are lost and sellers have no incentive to help minimize congestion because they bear no financial risk related to negative prices. Coupled with the PD’s prohibition against requiring sellers to select fully deliverable interconnections,¹² which would ensure that sellers pay their portion of any upgrades required for projects to be deliverable, the only incentive sellers have to opt for fully deliverable status is to add Resource Adequacy benefits to the product they offer, which, for intermittent resources such as wind, is not a significant part of their value.

¹⁰ PD at 16.

¹¹ *Id.* at 12.

¹² *Id.* at 19.

Therefore, it may be in sellers' interests to select an energy-only deliverability option which exacerbates congestion and negative price risk for customers.

In contrast to PG&E's provisions, SCE's economic curtailment provisions reasonably balance the congestion cost risk between sellers and customers. Sellers bear some of the risk of negative pricing since they may be economically curtailed up to a negotiated cap without compensation; thus, they are exposed to market price signals and have an incentive to minimize congestion. Above the cap, SCE's customers bear the burden, but still have protection from persistent negative pricing by curtailing a project. Moreover, the seller is fully compensated for any curtailed energy above the cap at the contract price, plus lost PTCs; thus, eliminating financing concerns surrounding the uncertainty of revenue streams related to economic curtailment. Unlike with PG&E's provisions, in SCE's provisions, the congestion cost risk is truly shared between sellers and customers, and market signals regarding congestion are provided to all parties.

SCE's revised economic curtailment approach is quite simple, yet it accommodates the complexities of the CAISO markets and those markets' efforts to address renewable integration. The issues surrounding integration of significant amounts of new renewable resources, transmission congestion, over-generation, and the related need for economic curtailment are important and complicated, and simplicity in contract language should not, on its own, be the metric of success. The PD recognizes that economic curtailment is an emerging issue with the implementation of MRTU, and that there is little information available estimating future congestion costs.¹³ Rather than foreclosing the IOUs taking different approaches to dealing with these issues, the CPUC should encourage creative solutions,¹⁴ which will provide additional information about what works for buyers, sellers, customers, and the market.

For all these reasons, the CPUC should modify the PD to remove the requirement that all IOUs include economic curtailment provisions equivalent to PG&E's in their pro forma contracts. If the CPUC does not make this modification, despite the negative effect on customers, then at a minimum, the

¹³ *Id.* at 16-17.

¹⁴ The CPUC has repeatedly emphasized the importance of IOU creativity and vigor in RPS program administration and implementation. *See id.* at 3; D.09-06-018 at 4; D.08-02-008 at 4; D.06-05-039 at 5.

CPUC should allow SCE to include pro forma economic curtailment provisions that do not include the five percent cap on economic curtailment included in PG&E's proposal, with reimbursement to the seller for lost PTCs for energy economically curtailed above five percent of expected annual generation. The seller should be indifferent to economic curtailment if it is paid in full, including lost PTCs.

III.

THE CPUC SHOULD ADOPT SCE'S FULL DELIVERABILITY PROPOSAL

As the PD explains, sellers have two interconnection options under the CAISO's Large Generator Interconnection Process: energy-only or fully deliverable.¹⁵ Energy-only interconnections expose the grid to higher risks of congestion and over-generation since generators with energy-only interconnections do not pay the costs of upgrades to ensure deliverability. Accordingly, SCE proposed that sellers be required to elect full deliverability.¹⁶ SCE also proposed that all CPUC-jurisdictional entities should require that their resources be connected via fully deliverable arrangements.¹⁷ This full deliverability requirement is necessary to bound and mitigate SCE customers' exposure to negative pricing which results from CAISO congestion and over-generation events. It also supports the development of a grid that can accommodate the renewable generation needed to meet the State's renewable energy goals.

The PD notes that "SCE expresses a legitimate concern that allowing energy-only projects to participate in RPS solicitations may increase the risk of congestion (and negative LMP prices) because those projects do not help fund deliverability upgrades."¹⁸ Nevertheless, the PD rejects SCE's full deliverability proposal, reasoning that the PD already addresses congestion cost concerns and mitigating ratepayer risk by including contract terms on economic curtailment, including congestion costs in the 2011 least-cost, best-fit ("LCBF") evaluation process, and including congestion cost information in the 2012 plans.¹⁹ The PD is wrong on this point.

¹⁵ PD at 17-18.

¹⁶ SCE's Second Amended 2010 RPS Procurement Plan, Attachment 1 at 36-37 (June 17, 2010).

¹⁷ *Id.* at 37.

¹⁸ PD at 19.

¹⁹ *Id.*

As explained above, the PD does not address congestion cost concerns or mitigate risk to customers by requiring each IOU to include PG&E's pro forma contractual provisions on economic curtailment. Instead, these provisions require customers to bear the full burden of congestion costs, and consequently provide generators with little incentive to ensure deliverability. The PD also severely limits the IOUs' ability to mitigate customer exposure to negative pricing by limiting the amount of economic curtailment to five percent of expected annual generation. Accordingly, it is particularly important that SCE have other mechanisms like requiring fully deliverability to limit the unbounded risk placed on its customers.²⁰

Similarly, incorporating congestion costs into the 2011 LCBF evaluation process does not remove the need for full deliverability. The LCBF evaluation methodology cannot fully evaluate the potential impact of negative pricing resulting from congestion and over-generation management without requiring full deliverability from all CPUC-jurisdictional entities. Under the existing CAISO market structure and rules, an unrelated (project contracted to another entity besides SCE) energy-only project interconnected in the same area as a SCE-contracted project can create negative pricing risk to SCE's customers via the CAISO markets regardless of whether that project has elected fully deliverability. This is because the MRTU markets are fundamentally based on resolving most physical constraints with financial pricing signals and have not prioritized one interconnection versus another (i.e., energy-only versus full deliverability). While these pricing signals may ultimately provide the right direction to the market participants on the best location to build new generation and construct transmission facilities in the long-term, the time required between recognizing the need and completing the project can be several years. Unless and until the MRTU markets are modified to provide fully deliverable resources some form of physical or financial preference in the markets, requiring full deliverability for all CPUC-jurisdictional entities is the only option available to mitigate this potential exposure to customers.

Finally, requiring the IOU to release available congestion cost information as part of their 2012 plans does not affect the need for renewable generators to be fully deliverable. The PD states that "there

²⁰ Even if the CPUC does not require SCE to include PG&E's economic curtailment provisions, SCE should be allowed to require full deliverability. SCE's economic curtailment terms include a cap on the number of hours a generator can be curtailed without compensation based on renewable developers' statements that such a cap is necessary for projects to be financeable. Thus, SCE needs other methods to mitigate customers' exposure to negative pricing.

is scant information available to the market regarding estimated future congestion costs for different project locations.”²¹ It is unclear why the PD believes the IOUs have better information on congestion costs than the rest of the market. Moreover, even if they did, the PD places the risk of congestion-related negative pricing on customers. Therefore, a full deliverability requirement is still necessary to help mitigate customers’ exposure to this risk. The CPUC should adopt SCE’s proposal that all CPUC-jurisdictional entities require their resources to be connected via fully deliverable arrangements, or at a minimum, allow SCE to require full deliverability as part of its 2011 solicitation.

IV.

THE IOUS SHOULD NOT BE REQUIRED TO PROVIDE CONGESTION COST INFORMATION

Starting with the 2012 plans, the PD requires the IOUs to release available congestion cost information.²² The IOUs are not the appropriate entities to provide this information. Congestion costs are a part of the CAISO market clearing process and are already made public on a daily basis by the CAISO.²³ This information is updated daily, available for all market days since the beginning of MRTU, and would be the basis of any congestion cost forecast. In addition, the CAISO makes public various full network models that can be used to forecast congestion costs. SCE has no additional market information beyond what is available to other market participants and should not be obligated to provide proprietary forecasts as part of the solicitation process.

V.

THE CPUC SHOULD ALLOW THE USE OF NON-ZERO INTEGRATION COST ADDERS FOR RENEWABLE RESOURCES

The PD rejects SCE’s and San Diego Gas & Electric Company’s proposals to use non-integration adders as part of their LCBF evaluation processes.²⁴ The PD notes the CPUC has previously

²¹ PD at 46 (FOF 5).

²² *Id.* at 17, 49 (COL 9).

²³ The CAISO posts congestion information for all nodes for both the Integrated Forward Market (the day-ahead MRTU market) and the Real Time market on the OASIS website. See <http://oasis.aiso.com/mrtu-oasis/?doframe=true&serverurl=http%3a%2f%2farptp10%2eoa%2ecaiao%2ecom%3a8000&volume=OASIS> - Under “Prices” tab.

²⁴ PD at 20, 46 (FOF 8), 50 (COL 10).

rejected proposals for non-zero integration adders, and that such costs need to be developed with public review and comment.²⁵

While the CPUC has rejected the use of non-zero integration adders, those prior determinations were based on information that is more than six years old, with no analysis of developments since that time, or whether a zero integration adder is still appropriate. The CPUC determined that integration cost adders should be zero “for the first year of RPS solicitations” in 2004, stating that “at present levels of penetration, renewable generation causes no noticeable increase in the cost of these ancillary services, beyond those costs imposed by normal system variability.”²⁶ The CPUC reiterated the direction to apply a zero adder in 2007 and 2008 without considering changing levels of renewable penetration, or whether a zero adder was still appropriate.²⁷

A significant amount of intermittent renewable resources has come on-line since 2004 and the amount of intermittent renewable resources in California will continue to expand as California moves towards its aggressive renewable energy goals. The CAISO recently released draft studies indicating that potentially thousands of MW of non-renewable resources will be needed to integrate intermittent renewable resources required to meet the State’s renewable energy goals.²⁸ Somebody has to pay for these resources, and their costs should be considered in the evaluation process in order to properly select the best renewable procurement contracts for customers. It is inappropriate for the PD to again require the IOUs to use a zero integration adder based on past decisions without any consideration of the true costs of integrating intermittent renewables.

A zero integration adder leads to suboptimal contract selection in the procurement process by potentially ignoring the true cost of intermittent generators. For example, a solar thermal plant that can provide and follow a fixed energy production schedule even though cloud cover passes over gets no extra value for this attribute. Renewable energy resources that can provide reliable energy deliveries are undervalued. It is not prudent to skip over firm resources that are priced slightly above intermittent resources simply because a portion of the renewable industry (e.g., wind or solar PV) does not agree

²⁵ *Id.* at 20.

²⁶ D.04-07-029 at 13.

²⁷ D.07-02-011 at 56; D.08-02-008 at 45.

²⁸ See <http://www.caiso.com/23bb/23bbc01d7bd0.html>.

with an integration adder. Although some developers of intermittent renewable resources will continue to raise objections to any non-zero adder, integration costs are real and significant. The CPUC needs to move expeditiously to either allow the IOUs to include their own non-zero integration cost adders in the evaluation process, or to initiate a process to determine an interim adder that can approximate these expected costs based on what we know from actual experience.

VI.

THE CPUC SHOULD APPROVE SCE'S PILOT PROGRAM FOR PRE-APPROVAL OF A LIMITED AMOUNT OF SHORT-TERM TRANSACTIONS

The PD again rejects the IOUs' proposed pilot programs for pre-approval of a limited amount of short-term RPS-eligible transactions, reasoning there is inadequate evidence that the fast-track approval process for short-term transactions the CPUC adopted in June 2009 does not work, cannot work, or cannot be reasonably modified.²⁹ SCE disagrees.

The current fast-track process is not commercially viable and simply does not work. There is significant evidence of these facts. SCE solicited fast-track proposals as part of its 2009 RPS solicitation and received no offers under this framework. To the best of SCE's knowledge, in the year and half since the fast-track process was adopted, no transactions have been approved through the process. SCE did submit one bilateral transaction for approval under the fast-track process.³⁰ Unfortunately, this transaction subsequently had to be terminated because the CPUC reclassified most out-of-state renewable transactions as renewable energy credit ("REC")-only transactions (including the transaction at issue) and determined that such transactions are ineligible for the fast-track process.³¹

The fast-track advice letter process is cumbersome and a barrier to getting contracts approved efficiently. Even though the fast-track process may potentially result in quicker CPUC approvals, there is still a considerable amount of time the seller has to wait before it has certainty around approval of the transaction. This time period is not acceptable for many sellers and adds a premium to the price for many others. Moreover, the current fast-track authority only applies to a small portion of transactions

²⁹ PD at 26, 50 (COL 14).

³⁰ See SCE Advice 2443-E.

³¹ D.10-03-021 at 52. The CPUC's decision to exclude all REC transactions (which includes most out-of-state transactions for energy and RECs) from the fast-track process has made the process even more unworkable.

that are available to SCE in order to meet the State’s renewable energy goals. These continuing barriers prevent SCE customers from accessing some of the most viable and cost-effective renewable transactions.

SCE has worked with the other IOUs and the Energy Division to develop a pilot proposal that met the objections to pre-approval of short-term transactions raised in connection with the 2009 RPS Procurement Plans. SCE’s proposal addresses a number of short-comings of the current fast-track process by leveraging many of the successful attributes used to conduct billions of dollars of pre-approved, non-renewable procurement each year. It also corrects the inherent deficiency in the current fast-track process by accommodating all RPS-eligible products. SCE’s proposal provides adequate safeguards, is limited in scope to launch on a trial basis, and is modeled on successfully implemented non-renewable procurement processes.

The PD notes the CPUC is “committed to ensuring that IOUs have a reasonable chance to capture short-term, fleeting opportunities while being able to optimally compete against each other and other LSEs.”³² If that is the case, the CPUC should approve SCE’s pilot program. If the CPUC does not approve SCE’s pilot program, then another proceeding or workshop process should be opened immediately to streamline the approval of renewable transactions, leveraging experience in the non-renewable procurement markets.

VII.

THE BENEFITS OF PURSUING A STANDARD IOU CONTRACT ARE SIGNIFICANTLY OUTWEIGHED BY THE BENEFITS OF THE IOUS’ FLEXIBILITY TO CREATIVELY ADDRESS ISSUES AND IMPROVE CONTRACT PROVISIONS

The PD encourages the IOUs to propose one standard contract that can be pre-approved by the CPUC.³³ SCE does not believe this effort would be productive. The IOUs’ existing contracting processes are working effectively. The CPUC has approved 184 contracts for over 16,000 MW of renewable capacity.³⁴ SCE alone has secured over 8,000 MW in renewable capacity through various

³² PD at 29.

³³ *Id.* at 29-30.

³⁴ CPUC Renewables Portfolio Standard Quarterly Report at 6 (Q4 2010).

procurement mechanisms since December 2002. The renewable market has also developed significantly from just a few years ago. There is no evidence that a standard IOU contract would improve contracting efforts.

In fact, the IOUs' different approaches to contracting allow for innovation and creativity in developing best practices for addressing market issues. The IOUs also have different interests and circumstances that require different contractual provisions. Moreover, a pre-approved contract would not be workable since negotiating contract terms is in the best interests of both IOU customers and market participants. Negotiated terms allow parties to be responsive to market needs and to allocate risk to the party in the best position to effectively mitigate the risk. Market conditions move faster than the regulatory process and no model contract can keep up with the movement of the market. This is especially true in the case of the IOUs' pro forma renewable solicitation contracts, which the IOUs submit for CPUC approval several months before their solicitations even begin.

Trying to increase the standardization of IOU solicitation contracts would require a great deal of time and effort for little apparent benefit. SCE recommends that the suggestion to pursue a standard IOU contract should be removed from the PD.

VIII.

THE CPUC SHOULD ADOPT SCE'S PROPOSED CHANGES TO THE PROJECT VIABILITY CALCULATOR

The PD rejects SCE's proposed changes to the projects viability calculator, concluding that the other IOUs did not make any comments on the calculator, and that any changes to the calculator should be made by staff with stakeholder participation.³⁵ The 2009 RPS solicitations were the first time the project viability calculator developed by staff was actually utilized. SCE offered its recommendations for improving the calculator, as well as recommendations from its Independent Evaluator, based on this real-world experience. SCE does not believe such suggestions should be disregarded merely because no other parties provided any input on the calculator. The PD notes that the calculator was developed as a tool for uniform, standardized comparison across projects and utilities.³⁶ However, many of SCE's

³⁵ PD at 34.

³⁶ *Id.*

comments focused on the fact that uncertainties in the calculator's criteria prevent uniform scoring of projects. The PD should be modified to accept SCE's proposed changes to the project viability calculator.

IX.

SCE INTENDS TO ADD A REQUIREMENT THAT PROJECTS HAVE CERTAIN INTERCONNECTION STUDIES COMPLETED TO BE SHORTLISTED

With the long delay in approval of the IOUs' 2010 RPS Procurement Plans, the 2010 plans have become the 2011 plans. Given this delay, the IOUs should be permitted to amend their plans to include new provisions based on lessons learned since the 2010 plans were originally filed. SCE is proposing to add a requirement for its 2011 solicitation that projects have at least completed a Phase 1 interconnection study, a System Impact Study, or 9 of the 10 screens in the fast-track interconnection process, and are active in an interconnection queue, in order to be shortlisted. This requirement will likely limit the pool of offers to projects that SCE views to be more viable due to sellers' more advanced development status. Limiting the pool of eligible proposals is not something that SCE does lightly as SCE supports broad markets. Nonetheless, this change will provide more certainty around potential network upgrade and interconnection costs, and a more accurate evaluation of such costs in the LCBF evaluation process.

SCE believes that the current Transmission Ranking Cost Report ("TRCR") process provides an extremely rough approximation of transmission cost impacts for proposed generating facilities within SCE's service territory. The TRCR study involves the assessment of an incremental plan of service and cost of interconnection for all proposed and queued projects. The TRCR results are intended to promote projects to be sited near identified low interconnection cost regions within SCE's grid. However, the TRCR process does not provide sufficient accuracy to make fine distinctions between projects in the proposal evaluation process. Furthermore, not all projects proposed to SCE during a solicitation will participate in the TRCR process. As a result, SCE must develop a full transmission plan of service for projects interconnecting to SCE's transmission system, after receipt of bids, to incorporate all projects properly.

SCE utilizes the publicly available TRCRs produced by the other IOUs to approximate the cost of interconnection for projects outside of SCE's territory, but within the CAISO's territory, although such TRCRs have the limitations discussed above. Additionally, SCE has found that estimates in the TRCR are even more speculative for network upgrade costs for generating facilities that will be located at sites within or beyond the service territories of other CAISO transmission providers.

By ensuring that shortlisted projects have some completed interconnection studies, SCE's proposal to use information derived from the scope of these interconnection studies will allow for a more accurate evaluation of potential network upgrade and interconnection costs than the TRCR. Accordingly, the CPUC should allow SCE to amend its plan to include this requirement.

X.

CONCLUSION

For the foregoing reasons, SCE respectfully requests that the CPUC approve the PD with the modifications discussed above.

Respectfully submitted,

MICHAEL D. MONTOYA
CATHY A. KARLSTAD

/s/ Cathy A. Karlstad

By: Cathy A. Karlstad

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-1096
Facsimile: (626) 302-1935
E-mail: Cathy.Karlstad@sce.com

Dated: March 3, 2011

VERIFICATION

I am a Manager in the Renewable and Alternative Power Department of Southern California Edison Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing pleading are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this **3rd day of March, 2011**, at Rosemead, California.

/s/ Laura Genao

By: Laura Genao

SOUTHERN CALIFORNIA EDISON COMPANY

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

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the California Public Utilities Commission's Rules of Practice and Procedure, I have this day served a true copy of the **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON PROPOSED DECISION CONDITIONALLY ACCEPTING 2011 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLANS AND INTEGRATED RESOURCE PLAN SUPPLEMENTS** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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Executed this **3rd day of March, 2011**, at Rosemead, California.

/s/ Melissa A.S. Hernandez

By: Melissa A.S. Hernandez

Project Analyst

SOUTHERN CALIFORNIA EDISON COMPANY

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



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Parties

CARRIE A. DOWNEY
 LAW OFFICES OF CARRIE ANNE DOWNEY
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: IMPERIAL IRRIGATION DISTRICT

CHRIS LEVERIZA
 GLACIAL ENERGY
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: GLACIAL ENERGY

CINDY L. CASSELMAN
 PILOT POWER GROUP, INC. (1365)
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: PILOT POWER GROUP, INC.

DANIEL W. DOUGLASS
 DOUGLASS & LIDDELL
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: ALLICANCE FOR RETAIL ENERGY
 MARKETS/DIRECT ACCESS/WWESTERN POWER
 TRADING FORUM/DIRECT ACCESS CUSTOMER
 COALITION/ENXCO, INC.

DONALD C. LIDDELL
 DOUGLASS & LIDDELL
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: CALIFORNIA ENERGY STORAGE
 ALLIANCE/WALMART STORES, INC. AND SAM'S
 WEST, INC. (MFPS 10/11/10-MFPS NOT YET
 GRANTED)

GREGORY S.G. KLATT
 DOUGLASS & LIDDELL
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: ALLIANCE FOR RETAIL ENERGY MARKETS

JESSICA NELSON
 PLUMAS-SIERRA RURAL ELECTRIC CO-OP
 EMAIL ONLY
 EMAIL ONLY, CA 00000

JOHN W. LESLIE, ESQ.
 LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: SHELL ENERGY NORTH AMERICA (US),
 L.P.

MATTHEW FREEDMAN
 THE UTILITY REFORM NETWORK
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: THE UTILITY REFORM NETWORK

WILL PLAXICO
 PROJECT DEVELOPMENT MGR
 AXIO POWER, INC.
 EMAIL ONLY
 EMAIL ONLY, CA 00000
 FOR: AXIO POWER, INC.

AIMEE M. SMITH
 SEMPRA ENERGY
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: SAN DIEGO GAS AND ELECTRIC CO.

DEANNA BODINE
 LIBERTY POWER HOLDINGS LLC
 EMAIL ONLY
 EMAIL ONLY, FL 00000-0000
 FOR: LIBERTY POWER HOLDINGS, LLC

JANICE G. HAMRIN
 CENTER FOR RESOURCE SOLUTIONS
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: CENTER FOR RESOURCE SOLUTIONS

JOHN NIMMONS
 JOHN NIMMONS & ASSOCIATES, INC.
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: RECURRENT ENERGY

LAURA WISLAND
 UNION OF CONCERNED SCIENTISTS
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: UNION OF CONCERNED SCIENTISTS

LAURIE MAZER
 BP WIND ENERGY NORTH AMERICA, INC.
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: BP WIND ENERGY NORTH AMERICA, INC.

MARTIN HOMEC
 REDWOOD RENEWABLES/CARE
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: CALIFORNIANS FOR RENEWABLE
 ENERGY/REDWOOD RENEWABLES

NANCY RADER
 EXECUTIVE DIRECTOR
 CALIFORNIA WIND ENERGY ASSOCIATION
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: CALIFORNIA WIND ENERGY ASSOCIATION

PATRICK VANBEEK
 COMMERCIAL ENERGY OF CALIFORNIA
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: COMMERCIAL ENERGY OF CALIFORNIA

RANDALL W. HARDY
 HARDY ENERGY CONSULTING
 EMAIL ONLY
 EMAIL ONLY, WA 00000-0000
 FOR: RANDALL W. HARDY

TED KO
 ASSOCIATE EXECUTIVE DIRECTOR
 FIT COALITION
 EMAIL ONLY
 EMAIL ONLY, CA 00000-0000
 FOR: FIT COALITION

DANIEL V. GULINO
 RIDGEWOOD POWER MANAGEMENT, LLC
 14 PHILIPS PKWY
 MONTVALE, NJ 07645-1811
 FOR: RIDGEWOOD POWER MANAGEMENT, LLC

RHONE RESCH
 SOLAR ENERGY INDUSTRIES ASSOCIATION
 575 7TH ST., NW, STE. 400
 WASHINGTON, DC 20004-1612

KEITH MCCREA
 ATTORNEY AT LAW
 SUTHERLAND, ASBILL & BRENNAN
 1275 PENNSYLVANIA AVENUE, NW
 WASHINGTON, DC 20004-2415
 FOR: CA MANUFACTURERS & TECHNOLOGY
 ASSN./LS POWER ASSOCIATES, L.P.

JAMES P. WHITE
 TRANSCANADA CORPORATION
 4547 RINCON PLACE
 MONTCLAIR, VA 22025
 FOR: CHINOOK POWER TRANSMISSION,
 LLC/ZEPHYR POWER TRANSMISSION, LLC

JOHN KERN
 BLUESTAR ENERGY SERVICES
 363 ERDY ERIE STREET, 7TH FLOOR
 CHICAGO, IL 60654
 FOR: BLUESTAR ENERGY SERVICES

MADELON A. KUCHERA
 ASSOC. GEN. COUNSEL - VP REGULATORY
 BLUESTAR ENERGY SOLUTIONS
 363 WEST ERIE STREET, SUITE 700
 CHICAGO, IL 60654
 FOR: BLUESTAR ENERGY SOLUTIONS

COMMERCE ENERGY, INC.
 5251 WESTHEIMER RD., STE. 1000
 HOUSTON, TX 77056-5414

KEVIN BOUDREAUX
ENERCAL USA LLC
EMAIL ONLY
EMAIL ONLY, TX 77063
FOR: ENERCAL USA, LLC

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

DAVID SAUL
PACIFIC SOLAR & POWER CORPORATION
2850 W. HORIZON RIDGE PKWY, SUITE 200
HENDERSON, NV 89052
FOR: SOLEL, INC.

CAMILLE A. GOULET
GENERAL COUNSEL
LOS ANGELES COMMUNITY COLLEGE DISTRICT
770 WILSHIRE BOULEVARD
LOS ANGELES, CA 90017
FOR: LOS ANGELES COMMUNITY COLLEGE
DISTRICT

KELLY CAUVEL
BUILD-LACCD
915 WILSHIRE BOULEVARD
LOS ANGELES, CA 90017
FOR: LOS ANGELES COMMUNITY COLLEGE
DISTRICT

LARRY EISENBERG
EXEC. DIR.-FACILITIES PLANNING
LOS ANGELES COMMUNITY COLLEGE DISTRICT
770 WILSHIRE BOULEVARD
LOS ANGELES, CA 90017
FOR: LOS ANGELES COMMUNITY COLLEGE
DISTRICT

RANDALL W. KEEN
ATTORNEY AT LAW
MANATT PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES, CA 90064
FOR: MANATT PHELPS & PHILLIPS, LLP

NORMAN A. PEDERSEN
HANNA AND MORTON LLP
444 S FLOWER ST., SUITE 1500
LOS ANGELES, CA 90071-2916
FOR: SOUTHERN CALIFORNIA GENERATION
COALITION

MICHAEL MAZUR
3 PHASES RENEWABLES, LLC
2100 SEPULVEDA BLVD, SUITE 37
MANHATTAN BEACH, CA 90266
FOR: 3 PHASES RENEWABLES

3 PHASES RENEWABLES LLC
2100 SEPULVEDA BLVD, SUITE 37
MANHATTAN BEACH, CA 90266

SUSAN MUNVES
ENERGY AND GREEN BLDG. PROG. ADMIN.
CITY OF SANTA MONICA
1212 5TH STREET, FIRST FLOOR
SANTA MONICA, CA 90401

ELIZABETH WRIGHT
OCCIDENTAL POWER SERVICES, INC.
111 WEST OCEAN BOULEVARD
LONG BEACH, CA 90802

PAUL DELANEY
AMERICAN UTILITY NETWORK (A.U.N.)
10705 DEER CANYON DRIVE
ALTA LOMA, CA 91737
FOR: AMERICAN UTILITY NETWORK

CATHY A. KARLSTAD
ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

MICHAEL D. MONTOYA
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, PO BOX 800
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BOULEVARD
SAN DIMAS, CA 91773

SOCAL WATER/BEAR VALLEY ELECTRIC
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773

CHERYL PONDS
OFFICE OF THE CITY ATTORNEY
276 FOURTH AVENUE
CHULA VISTA, CA 91910
FOR: THE CITY OF CHULA VISTA

MICHAEL MEACHAM
ENVIRONMENTAL RESOURCE MANAGER
CITY OF CHULA VISTA

MARY C. HOFFMAN
PRESIDENT
SOLUTIONS FOR UTILITIES, INC.

276 FOURTH AVENUE
CHULA VISTA, CA 91910

1192 SUNSET DRIVE
VISTA, CA 92081
FOR: SOLUTIONS FOR UTILITIES, INC.

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

FREDERICK M. ORTLIEB
OFFICE OF CITY ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVENUE, SUITE 1200
SAN DIEGO, CA 92101
FOR: CITY OF SAN DIEGO

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

GREG BASS
NOBLE AMERICAS ENERGY SOLUTIONS LLC
401 WEST A STREET, SUITE 500
SAN DIEGO, CA 92101-3017
FOR: SEMPRA ENERGY SOLUTIONS LLC

THEODORE E. ROBERTS
SEMPRA GENERATION / SEMPRA BROADBAND
101 ASH STREET, HQ 12B
SAN DIEGO, CA 92101-3017
FOR: SEMPRA ENERGY

NOBLE AMERICAS ENERGY SOLUTIONS LLC
101 ASH STREET, HQ09
SAN DIEGO, CA 92101-3017

MARCIE MILNER
SHELL ENERGY NORTH AMERICA
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA 92121

GLORIA BRITTON
ANZA ELECTRIC COOPERATIVE, INC. (909)
PO BOX 391909 / 58470 HWY 371
ANZA, CA 92539
FOR: ANZA ELECTRIC COOPERATIVE

KERRY EDEN
ASST. GENERAL MGR.
CITY OF CORONA DEPT. OF WATER & POWER
730 CORPORATION YARD WAY
CORONA, CA 92880

PHILLIP REESE
C/O REESE-CHAMBERS SYSTEMS CONSULTANTS,
PO BOX 8
3379 SOMIS ROAD
SOMIS, CA 93066
FOR: THE CALIFORNIA BIOMASS ENERGY
ALLIANCE

JOSEPH LANGENBERG
CENTRAL CALIFORNIA POWER
5125 NORTH MARTY AVENUE, NO.324
FRESNO, CA 93711

DAVID ORTH
SAN JOAQUIN VALLEY POWER AUTHORITY
ADMIN OFF @KINGS RIVER CONSERV DISTRICT
4886 EAST JENSEN AVENUE
FRESNO, CA 93725
FOR: SAN JOAQUIN VALLEY POWER
AUTHORITY/KING'S RIVER CONSERVATION
DISTRICT

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94015
FOR: OCCIDENTAL POWER SERVICES,
INC./FIRST SOLAR, INC., ENERGY
PRODUCERS AND USERS COALITION.

BRUCE FOSTER
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVENUE, STE. 2040
SAN FRANCISCO, CA 94102

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

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

JEANNE M. SOLE
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO

MARCEL HAWIGER
ENERGY ATTY
THE UTILITY REFORM NETWORK

1 DR. CARLTON B. GOODLETT PLACE, RM. 375 115 SANSOME STREET, SUITE 900
 SAN FRANCISCO, CA 94102-4682 SAN FRANCISCO, CA 94104
 FOR: CITY AND COUNTY OF SAN FRANCISCO FOR: THE UTILITY REFORM NETWORK

ARNO HARRIS
 RECURRENT ENERGY, INC.
 300 CALIFORNIA ST., 8TH FL.
 SAN FRANCISCO, CA 94104-1416

CHARLES R. MIDDLEKAUFF
 ATTORNEY
 PACIFIC GAS AND ELECTRIC COMPANY
 77 BEALE STREET, B30A / PO BOX 7442
 SAN FRANCISCO, CA 94105
 FOR: PACIFIC GAS AND ELECTRIC COMPANY

EVELYN C. LEE
 ATTORNEY AT LAW
 PACIFIC GAS AND ELECTRIC COMPANY
 77 BEALE STREET, MC B30A
 SAN FRANCISCO, CA 94105
 FOR: PACIFIC GAS AND ELECTRIC COMPANY

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

ADAM BROWNING
 THE VOTE SOLAR INITIATIVE
 300 BRANNAN STREET, SUITE 609
 SAN FRANCISCO, CA 94107
 FOR: THE VOTE SOLAR INITIATIVE

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

JAMES D. SQUERI
 ATTORNEY AT LAW
 GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
 505 SANSOME STREET, SUITE 900
 SAN FRANCISCO, CA 94111
 FOR: CALIFORNIA RETAILERS ASSOCIATION

JEANNE B. ARMSTRONG
 GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
 505 SANSOME STREET, SUITE 900
 SAN FRANCISCO, CA 94111
 FOR: SOLAR ALLIANCE

MICHAEL DAY
 GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
 505 SANSOME STREET, STE. 900
 SAN FRANCISCO, CA 94111
 FOR: THE VOTE SOLAR
 INITIATIVE/RECURRENT ENERGY, INC.

STEVEN F. GREENWALD
 ATTORNEY AT LAW
 DAVIS WRIGHT TREMAINE LLP
 505 MONTGOMERY STREET, SUITE 800
 SAN FRANCISCO, CA 94111
 FOR: NEWBERRY GEOTHERMAL LLC

SUZY HONG
 ATTORNEY AT LAW
 GOODIN MACBRIDE SQUERI DAY & LAMPREY
 505 SANSOME STREET, SUITE 900
 SAN FRANCISCO, CA 94111
 FOR: TERRA-GEN POWER, LLC

DAVID L. HUARD
 MANATT, PHELPS & PHILLIPS, LLP
 ONE EMBARCADERO CENTER, STE 2900
 SAN FRANCISCO, CA 94111-3736
 FOR: MANATT, PHELPS & PHILLIPS, LLP

TODD EDMISTER
 ATTORNEY AT LAW
 BINGHAM MCCUTCHEN LLP
 THREE EMBARCADERO CENTER
 SAN FRANCISCO, CA 94111-4067
 FOR: STIRLING ENERGY SYSTEMS, INC. (SES)

JOSEPH M. KARP
 ATTORNEY AT LAW
 WINSTON & STRAWN LLP
 101 CALIFORNIA STREET, 39TH FLOOR
 SAN FRANCISCO, CA 94111-5894
 FOR: CALIFORNIA WIND ENERGY
 ASSN./ABENGOA SOLAR INC./AUSRA INC AND
 BRIGHTSOURCE ENERGY INC.

EDWARD W. O'NEILL
 ATTORNEY AT LAW
 DAVIS WRIGHT TREMAINE LLP
 505 MONTGOMERY STREET, SUITE 800
 SAN FRANCISCO, CA 94111-6533
 FOR: CALIFORNIA LARGE ENERGY CONSUMERS
 ASSOCIATION

JEFFREY P. GRAY
 DAVIS WRIGHT TREMAINE, LLP
 505 MONTGOMERY STREET, SUITE 800
 SAN FRANCISCO, CA 94111-6533
 FOR: CALPINE POWER AMERICA-CA, LLC

MICHAEL S. HINDUS
 PILLSBURY WINTROP SHAW PITTMAN LLP
 50 FREMONT STREET, PO BOX 7880

SARA STECK MYERS
 ATTORNEY AT LAW
 122 28TH AVE.

SAN FRANCISCO, CA 94120-7880
FOR: NEXTERA ENERGY RESOURCES

SAN FRANCISCO, CA 94121
FOR: CENTER FOR ENERGY EFFICIENCY AND
RENEWABLE TECHNOLOGIES

GABE PETLIN
3DEGREES
38 KEYES AVE., STE. 300
SAN FRANCISCO, CA 94129-1757

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

WILLIAM S. KAMMERER
FIT COALITION
2092 MOHAWK DRIVE
PLEASANT HILL, CA 94523
FOR: FIT COALITION

JOHN DUTCHER
VP - REGULATORY AFFAIRS
MOUNTAIN UTILITIES, LLC
3210 CORTE VALENCIA
FAIRFIELD, CA 94534-7875
FOR: MOUNTAIN UTILITIES

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICES OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA, CA 94556
FOR: RIDGEWOOD RENEWABLE POWER, LLC AND
RIDGEWOOD OLINDA, LLC

AVIS KOWALEWSKI
CALPINE CORPORATION
4160 DUBLIN BLVD., SUITE 100
DUBLIN, CA 94568
FOR: CALPINEPOWERAMERICA-CA, LLC

SUE KATELEY
EXECUTIVE DIRECTOR
CALIF. SOLAR ENERGY INDUSTRIES ASSN.
PO BOX 782
RIO VISTA, CA 94571
FOR: CALIFORNIA SOLAR ENERGY INDUSTRIES
ASSOCIATION

RICK C. NOGER
PRAXAIR, INC. (1370)
2430 CAMINO RAMON DRIVE, STE. 300
SAN RAMON, CA 94583

JP ROSS
VP STRATEGOC RELATIONSHIPS
SUNGEVITY
66 FRANKLIN ST., STE 310
OAKLAND, CA 94607-3734
FOR: THE VOTE SOLAR INITIATIVE

JODY LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND, CA 94609
FOR: SUSTAINABLE CONSERVATION AND RCM
INTERNATIONAL

KEVIN T. FOX
KEYES & FOX LLP
436 14TH STREET, SUITE 1305
OAKLAND, CA 94612
FOR: SILVERADO POWER, LLC

GREGG MORRIS
DIRECTOR
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704
FOR: GREEN POWER INSTITUTE

NEAL DE SNOO
CITY OF BERKELEY
2180 MILVIA STREET, 2ND FLOOR
BERKELEY, CA 94704
FOR: EAST BAY POWER AUTHORITY/CITY OF
BERKELEY

CLYDE MURLEY
CONSULTANT TO NRDC
1031 ORDWAY STREET
ALBANY, CA 94706
FOR: THE COMMUNITY COLLEGE LEAGUE OF
CALIFORNIA

R. THOMAS BEACH
PRINCIPAL CONSULTANT
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 213A
BERKELEY, CA 94710-2557
FOR: THE CALIFORNIA COGENERATION
COUNCIL/SOLAR ALLIANCE

DAWN WEISZ
INTERIM DIR.
MARIN ENERGY AUTHORITY
781 LINCOLN AVENUE, SUITE 320
SAN RAFAEL, CA 94901
FOR: MARIN ENERGY AUTHORITY

ANDERS GLADER
SVP, ORIGINATION
IBERDROLA RENEWABLES

L. JAN REID
COAST ECONOMIC CONSULTING
3185 GROSS ROAD

114 MORNING SUN AVENUE
MILL VALLEY, CA 94941
FOR: ELEMENT POWER

SANTA CRUZ, CA 95062
FOR: L. JAN REID

MICHAEL E. BOYD
PRESIDENT
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
5439 SOQUEL DRIVE
SOQUEL, CA 95073
FOR: CALIFORNIANS FOR RENEWABLE
ENERGY, INC.

JOHN R. REDDING
ARCTURUS ENERGY CONSULTING
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
FOR: SILICON VALLEY MANUFACTURERS GROUP

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

JUDITH SANDERS
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

MOUNTAIN UTILITIES
PO BOX 1
KIRKWOOD, CA 95646

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

DAN GEIS
THE DOLPHIN GROUP
925 L STREET, SUITE 800
SACRAMENTO, CA 95814
FOR: INLAND EMPIRE UTILITIES AGENCY

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

DAVID A. BISCHEL
PRESIDENT
CALIFORNIA FORESTRY ASSOCIATION
1215 K STREET, SUITE 1830
SACRAMENTO, CA 95814
FOR: CALIFORNIA FORESTRY ASSOCIATION

JAN MCFARLAND
CAEATFA
915 CAPITOL MALL, RM. 468
SACRAMENTO, CA 95814
FOR: AMERICANS FOR SOLAR POWER

JIM METROPULOS
SR. ADVOCATE
SIERRA CLUB CALIFORNIA
801 K STREET, SUITE 2700
SACRAMENTO, CA 95814
FOR: SIERRA CLUB CALIFORNIA

SCOTT BLAISING
BRAUN BLAISING MCLAUGHLIN, P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA 95814
FOR: CITY OF CERRITOS

SAMANTHA G. POTTENGER
ELLISON, SCHNEIDER AND HARRIS L.L.P.
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816
FOR: FORTISTAR METHANE GROUP

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON SCHNEIDER & HARRIS, LLP (1359)
2600 CAPITAL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: SIERRA PACIFIC POWER
COMPANY/CONSTELLATION NEWENERGY, INC.

DOUGLAS K. KERNER
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: FORTISTAR METHANE GROUP/SIERRA
PACIFIC INDUSTRIES

LYNN M. HAUG
ELLISON, SCHNEIDER & HARRIS, L.L.P.
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5931
FOR: FUELCELL ENERGY, INC./SIERRA
PACIFIC POWER

WILLIAM W. WESTERFIELD III
SR. ATTORNEY - OFF. OF GEN. COUNSEL
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET, M.S. B402

CHRISTINE HENNING
LARGE SCALE SOLAR ASSOCIATION
3572 HUNTSMAN DRIVE
SACRAMENTO, CA 95826

SACRAMENTO, CA 95817
FOR: SACRAMENTO MUNICIPAL UTILITY
DISTRICT

FOR: LARGE-SCALE SOLAR ASSOCIATION

KAREN NORENE MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833

J. COURTNEY OLIVE
ATTORNEY-ADVISOR
BONNEVILLE POWE ADMINISTRATION
905 NE 11TH AVE
PORTLAND, OR 97217
FOR: BONNEVILLE POWER ADMINISTRATION
(BPA)

THOMAS ELGIE
POWEREX CORPORATION
1400, 666 BURRAND ST
VANCOUVER, BC V6C 2X8
CANADA
FOR: POWEREX CORPORATION

Information Only

AMY BAKER
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

AMY FREES
THIRD PLANET WINDPOWER, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

ANDREW LUCSCZ
GLACIAL ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

ARI CITRIN
PROSOLIA SOLAR, CFO NORTH AMERICA
EMAIL ONLY
EMAIL ONLY, CA 00000

BILLY BLATTNER
SAN DIEGO GAS & ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: SDG&E/SOCAL GAS

DAVID E. MORSE
EMAIL ONLY
EMAIL ONLY, CA 00000

DAVID TOWNLEY
US SALES & MARKETING
INFINIA CORPORATION
EMAIL ONLY
EMAIL ONLY, WA 00000

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

ERIN GRIZARD
BLOOM ENERGY, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000

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

JAN PEPPER
ELECTRIC DIV., MGR.
SILICON VALLEY POWER
EMAIL ONLY
EMAIL ONLY, CA 00000

JANICE LIN
MANAGING PARTNER
STRATEGEN CONSULTING LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

KAREN NORENE MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
EMAIL ONLY
EMAIL ONLY, CA 00000

KENNETH SAHM WHITE
FIT COALITION
EMAIL ONLY
EMAIL ONLY, CA 00000

KRISTIN BURFORD
LARGE-SCALE SOLAR ASSOCIATION

LESLIE E. SHERMAN
ORRICK, HERRINGTON & SUTCLIFFE LLP

EMAIL ONLY
EMAIL ONLY, CA 00000

EMAIL ONLY
EMAIL ONLY, CA 00000

MARJORIE OXSEN
CALPINE CORPORATION
EMAIL ONLY
EMAIL ONLY, CA 00000

MATT MILLER
DEVELOPMENT ANALYST
RECURRENT ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

MELISSA P. MARTIN
STATESIDE ASSOCIATES
EMAIL ONLY
EMAIL ONLY, CA 00000

MICHAEL WHEELER
RECURRENT ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

NEDRA YOUNG
WINTEC ENERGY, LTD
EMAIL ONLY
EMAIL ONLY, CA 00000

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

TAM HUNT
HUNT CONSULTING
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: CLEAN COALITION/COMMUNITY
ENVIRONMENTAL COUNCIL

THOMAS R. DARTON
PILOT POWER GROUP, INC. (1365)
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: PILOT POWER GROUP, INC.

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

TODD JOHANSEN
DEVELOPMENT ANALYST
RECURRENT ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000

SILVERADO POWER LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

SILVERADO POWER LLC
EMAIL ONLY
EMAIL ONLY, CA 00000

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

ART RIVERA
RENEWABLE TECHCOM
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

CURTIS KEBLER
SEMPRA GENERATION
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

CYNTHIA A. BRADY
SENIOR COUNSEL
CONSTELLATION ENERGY GROUP INC
EMAIL ONLY
EMAIL ONLY, IL 00000-0000

CYNTHIA FONNER BRADY
SENIOR COUNSEL
CONSTELLATION NEW ENERGY, INC.
EMAIL ONLY
EMAIL ONLY, IL 00000-0000

DEREK DENNISTON
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

G. PATRICK STONER
PROGRAM DIRECTOR
LOCAL GOVERNMENT COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

IAN MCGOWAN
UTILITY PARTNERSHIP MANAGER
3DEGREES
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

JENNIFER BARNES
NAVIGANT CONSULTING, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

JIM STACK, PH.D.
RESOURCE PLANNER
CITY OF PALO ALTO UTILITIES
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

LILY M. MITCHELL
HANNA AND MORTON LLP
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

MARK STOUT
MERIDIAN ENERGY USA, INC
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

MOHAN NIROULA
CALIF DEPT OF WATER RESOURCES
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

PETER BLOOD
COLUMBIA ENERGY PARTNERS, LLC
EMAIL ONLY
EMAIL ONLY, WA 00000-0000

POLLY SHAW
SUNTECH AMERICA, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
FOR: SUNTECH AMERICA, INC.

RICHARD F. CHANDLER
BP SOLAR
EMAIL ONLY
EMAIL ONLY, MA 00000-0000

RICHARD W. RAUSHENBUSH
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

RYAN PLETKA
RENEWABLE ENERGY PROJECT MANAGER
BLACK & VEATCH
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
FOR: BLACK & VEATCH

SHAUN HALVERSON
PACIFIC GAS AND ELECTRIC COMPANY
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
FOR: PACIFIC GAS AND ELECTRIC COMPANY

STEPHEN HESS
DIRECTOR, MARKET POLICY & REG. AFFAIRS
EDISON MISSION MARKETING & TRADING INC.
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

THOMAS HOBSON
GE ENERGY
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

THOMAS P. CORR
SEMPRA ENERGY GLOBAL ENTERPRISES
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

TRACY PHILLIPS
TIGER NATURAL GAS, INC.
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

COOL EARTH SOLAR
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
FOR: COOL EARTH SOLAR

DAVIS WRIGHT TREMAINE, LLC
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

HARRY SINGH
RBS SEMPRA COMMODITIES
600 WASHINGTON BLVD
STAMFORD, CT 06901

KAREN KOCHONIES
MORGAN STANLEY
2000 WESTCHESTER AVE., 1ST FLOOR
PURCHASE, NY 10577

MORGAN HANSEN
MORGAN STANLEY - COMMODITIES
2000 WESTCHESTER AVE., 1ST FLOOR
PURCHASE, NY 10577

NICHOLE FABRI ZANDOLI
PRESIDENT
CLEAR ENERGY BROKERAGE & CONSULTING LLC
403 PARKSIDE AVENUE
BROOKLYN, NY 11226
FOR: CLEAR ENERGY BROKERAGE &
CONSULTING LLC

RONALD M. CERNIGLIA
DIRECTOR- NATIONAL ADVOCACY
DIRECT ENERGY SERVICES, LLC
40 COLUMBINE DRIVE
GLENMONT, NY 12077-2966
FOR: DIRECT ENERGY SERVICES, LLC

VENKAT SURAVARAPU
ASSOCIATES DIRECTOR
CAMBRIDGE ENERGY RESEARCH ASSOCIATES
1150 CONNECTICUT AVE., NW STE 400
WASHINGTON, DC 20036-4133
FOR: CAMBRIDGE ENERGY RESEARCH

ASSOCIATES

TODD JAFFE
ENERGY BUSINESS BROKERS AND CONSULTANTS
3420 KEYSER ROAD
BALTIMORE, MD 21208

GARSON KNAPP
FPL ENERGY, LLC
770 UNIVERSE BLVD.
JUNO BEACH, FL 33408

SAMARA M. RASSI
REGULATORY AFFAIRS ANALYST
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DR., SUITE 2500
LOUISVILLE, KY 40223

CATHY S. WOOLLUMS
MIDAMERICAN ENERGY HOLDINGS COMPANY
106 EAST SECOND STREET
DAVENPORT, IA 52801

JON M. CASADONT
SVP & GENERAL COUNSEL
BLUE STAR ENERGY SERVICES INC
363 WEST ERIE STREET, SUITE 700
CHICAGO, IL 60654

JASON ABIECUNAS
BLACK & BEATCH GLOBAL RENEWABLE ENERGY
RENEWABLE ENERGY CONSULTANT
11401 LAMAR
OVERLAND PARK, KS 66211
FOR: RENEWABLE ENERGY CONSULTANT

ROSS BUCKENHAM
CALIFORNIA BIOENERGY LLC
2828 ROUTH STREET, SUITE 500
DALLAS, TX 75201

ED CHIANG
ELEMENT MARKETS, LLC
3555 TIMMONS LANE, STE. 900
HOUSTON, TX 77027-6453

JOHN PITTS
3112 WINDSOR RD, A318
AUSTIN, TX 78703

JONATHAN JACOBS
PA CONSULTING GROUP
1700 LINCOLN ST STE 4600
DENVER, CO 80203-4509

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

CAITLIN COLLINS LIOTIRIS
ENERGY STRATEGIES, LLC
215 SOUTH STATE STREET, SUITE 200
SALT LAKE, UT 84111

JENINE SCHENK
APS ENERGY SERVICES
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85004

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO, NV 89520

TREVOR DILLARD
RATE REGULATORY RELATIONS
SIERRA PACIFIC POWER COMPANY
6100 NEAL ROAD, MS S4A50 / PO BOX 10100
RENO, NV 89520-0024

JOE GRECO
TERRA-GEN POWER LLC
9590 PROTOTYPE COURT, SUITE 200
RENO, NV 89521
FOR: TERRA-GEN POWER, LLC

JEFF NEWMAN
TRANSPORTATION AND HOUSING AGENCY
7080 HOLLYWOOD BLVD., SUITE 900
LOS ANGELES, CA 90028

CLAIRE E. TORCHIA
CHADBOURNE & PARKE LLP
350 SOUTH GRAND AVE., STE 3300
LOS ANGELES, CA 90071

KRYSTYN TENDY
CHADBOURNE & PARKE LLP
350 SOUTH GRAND AVENUE, 32ND FLOOR
LOS ANGELES, CA 90071

FRED G. YANNEY
FULBRIGHT & JAWORSKI L.L.P.
555 SOUTH FLOWER STREET, 41ST FLOOR
LOS ANGELES, CA 90071-2571

HARVEY M. EDER
PUBLIC SOLAR POWER COALITION
1218 12TH STREET, NO. 25
SANTA MONICA, CA 90401

INGER GOODMAN
COMMERCE ENERGY INC
1 CENTERPOINTE DRIVE, SUITE 350
LA PALMA, CA 90623-2520

DOUGLAS MCPHERSON
130 W. UNION STREET

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY

PASADENA, CA 91103

245 MARKET STREET, MC N12G
SAN FRANCISCO, CA 91105FREEMAN S. HALL
SOLAR ELECTRIC SOLUTIONS, LLC
5353 TOPANGA CANYON BLVD, STE 300
WOODLAND HILLS, CA 91364
FOR: SOLAR ELECTRIC SOLUTIONS, LLCJACK MCNAMARA
ATTORNEY AT LAW
MACK ENERGY COMPANY
PO BOX 1380
AGOURA HILLS, CA 91376-1380CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANYGEORGE WILTSEE
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770JONI A. TEMPLETON
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, PO BOX 800
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANYLAURA I. GENAO
SOUTHERN CALIFORNIA EDISON COMPANY
PO BOX 800, 2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770KEITH SWITZER
VP REGULATORY AFFAIRS
GOLDEN STATE WATER COMPANY
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773-9016CHAD CHAHBAZI
BAP POWER CORPORATION D/B/A CENERGY
2784 GATEWAY ROAD, SUITE 102
CARLSBAD, CA 92009ROBERT J. GILLESKIE
LIGHTPOINT CONSULTING SERVICES
2570 PINWOOD STREET
DEL MAR, CA 92014JEFF COX
1557 MANDEVILLE PLACE
ESCONDIDO, CA 92029GEOREG GISEL
INDEPENDENT ENERGY SOLUTIONS, INC.
1090 JOSHUA WAY
VISTA, CA 92081STEVEN C. NELSON
ATTORNEY
SEMPRA ENERGY
101 ASH STREET HQ-12B
SAN DIEGO, CA 92101-3017TERRY FARRELLY
269 G AVENUE
CORONADO, CA 92118HANNON RASOOL
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK CT.
SAN DIEGO, CA 92123DESPINA NIEHAUS
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32H
SAN DIEGO, CA 92123-1530CENTRAL FILES
SDG&E AND SOCALGAS
8330 CENTURY PARK COURT, CP31-E
SAN DIEGO, CA 92123-1550
FOR: SAN DIEGO GAS & ELELCTRICFRED W. NOBLE
PRESIDENT
WINTEC ENERGY, LTD
1090 N. PALM CANYON DR., SUITE A
PALM SPRINGS, CA 92260
FOR: WINTEC ENERGY, LTDPETER T. PEARSON
ENERGY SUPPLY SPECIALIST
BEAR VALLEY ELECTRIC SERVICE
42020 GARSTIN DRIVE, PO BOX 1547
BIG BEAR LAKE, CA 92315-1547CARL STEEN
BAKER & HOSTETLER LLP
600 ANTON BLVD., SUITE 900
COSTA MESA, CA 92626
FOR: BAKER & HOSTETLER LLPROGER LEE
BAKER & HOSTETLER LLP
600 ANTON BLVD., SUITE 900
COSTA MESA, CA 92626
FOR: BAKER & HOSTETLER LLP

MICHAEL CHESTONE

JOHN DEWEY

SHARP ELECTRONICS CORPORATION
5901 BOLSA AVENUE
HUNTINGTON BEACH, CA 92647

THE DEWEY GROUP
3700 CAMPUS DRIVE, SUITE 207
NEWPORT BEACH, CA 92660

LEONARD LEICHNITZ
LUMOS POWER LP
1280 BISON B9-37
NEWPORT BEACH, CA 92660

KELLIE M. HANIGAN
ENCO UTILITY SERVICES
8141 E. KAISER BLVD., STE. 212
ANAHEIM, CA 92808

PETER MORITZBURKE
3 ECHO AVENUE
CORTE MADERA, CA 92925

JANET M. GAGNON
SOLARWORLD CALIFORNIA
4650 ADOHR LANE
CAMARILLO, CA 93012

JEFF HIRSCH
JAMES J. HIRSCH & ASSOCIATES
12185 PRESILLA ROAD
CAMARILLO, CA 93012-9243

HAROLD M. ROMANOWITZ
OAK CREEK ENERGY SYSTEMS, INC.
14633 WILLOW SPRINGS ROAD
MOJAVE, CA 93501
FOR: OAK CREEK ENERGY SYSTEMS, INC.

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

MARC D. JOSEPH
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., STE. 1000
SOUTH SAN FRANCISCO, CA 94080
FOR: ADAMS BROADWELL JOSEPH & CARDOZO

WILLIAM
SOLAR SEMICONDUCTOR INC.
1292 KIFER ROAD, SUITE 808
SUNNYVALE, CA 94086

PAUL FENN
LOCAL POWER
35 GROVE STREET
SAN FRANCISCO, CA 94102

DAN ADLER
DIRECTOR, TECH AND POLICY DEVELOPMENT
CALIFORNIA CLEAN ENERGY FUND
5 THIRD STREET, SUITE 1125
SAN FRANCISCO, CA 94103
FOR: CALIFORNIA CLEAN ENERGY FUND

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

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

THERESA BURKE
SAN FRANCISCO PUC
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103
FOR: SAN FRANCISCO PUBLIC UTILITIES
COMMISSION

NORMAN J. FURUTA
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., SUITE 1744
SAN FRANCISCO, CA 94103-1399

ANDRE DEVILBISS
ASSOCIATE, DEVELOPMENT
RECURRENT ENERGY
300 CALIFORNIA STREET, 8TH FLOOR
SAN FRANCISCO, CA 94104

DOUGLAS E. COVER
ENVIRONMENTAL SCIENCE ASSOCIATES
225 BUSH STREET, SUITE 1700
SAN FRANCISCO, CA 94104

HANS ISERN
VP - ENGINEERING
SILVERADO POWER LLC
44 MONTGOMERY STREET, SUITE 3065
SAN FRANCISCO, CA 94104

JIM HOWELL
RECURRENT ENERGY
300 CALIFORNIA ST., 8TH FLOOR
SAN FRANCISCO, CA 94104

LUKE DUNNINGTON
ASSOCIATE, DEVELOPMENT
RECURRENT ENERGY
300 CALIFORNIA STREET, 8TH FL
SAN FRANCISCO, CA 94104

SAM MASLIN

SNULLER PRICE

RECURRENT ENERGY
300 CALIFORNIA STREET, 8TH FL.
SAN FRANCISCO, CA 94104

ENERGY AND ENVIRONMENTAL ECONOMICS
101 MONTGOMERY, SUITE 1600
SAN FRANCISCO, CA 94104
FOR: ENERGY AND ENVIRONMENTAL ECONOMICS

MICHAEL E. CARBOY
SIGNAL HILL CAPITAL LLC
343 SANSOME STREET, SUITE 425
SAN FRANCISCO, CA 94104-5619

ANUPAMA VEGE
FIRST WIND
2 SHAW ALLEY, SUITE 500
SAN FRANCISCO, CA 94105

CASE COORDINATION
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., PO BOX 770000 MC B9A
SAN FRANCISCO, CA 94105

ED LUCHA
CASE COORDINATOR
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A, ROOM 991
SAN FRANCISCO, CA 94105

GRADY MATHAI-JACKSON
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

JASON YAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B13L
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC COMPANY

JOHN PAPPAS
UTILITY ELECTRIC PORTFOLIO MANAGEMENT
PACIFIC GAS AND ELECTRIC COMPANY
245 MARKET STREET, MC N12G
SAN FRANCISCO, CA 94105

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105
FOR: COGENERATION ASSOCIATION OF
CALIFORNIA

LAUREN ROHDE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105

MAGGIE CHAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A / PO BOX 770000
SAN FRANCISCO, CA 94105

MICHAEL P. GINSBURG
ATTORNEY AT LAW
ORRICK, HERRINGTON & SUTCLIFFE LLP
405 HOWARD STREET
SAN FRANCISCO, CA 94105

SHERIDAN J. PAUKER
WILSON SONSINI GOODRICH & ROSATI
SPEAR TOWER, SUITE 3300
ONE MARKET STREET
SAN FRANCISCO, CA 94105

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

CORY M. MASON
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B30A
SAN FRANCISCO, CA 94105-1814
FOR: PACIFIC GAS AND ELECTRIC COMPANY

NIELS KJELLUND
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B9A
SAN FRANCISCO, CA 94105-1814

ERIK STUEBE
ECOPLEXUS LLC
1733 20TH STREET
SAN FRANCISCO, CA 94107

ALEX MARTIN
NEXTLIGHT RENEWABLE POWER, LLC
353 SACRAMENTO ST. SUITE 2100
SAN FRANCISCO, CA 94111

FRANK DE ROSA
NEXTLIGHT RENEWABLE POWER, LLC
353 SACRAMENTO STREET, 21ST FL.
SAN FRANCISCO, CA 94111

JACK STODDARD
MANATT PHELPS & PHILLIPS, LLP
ONE EMBARCADERO CENTER, 30TH FLOOR
SAN FRANCISCO, CA 94111

JAMES B. WOODRUFF
ATTORNEY AT LAW
NEXTLIGHT RENEWABLE POWER, LLC
353 SACRAMENTO STREET, 21ST FL.
SAN FRANCISCO, CA 94111

JANINE L. SCANCARELLI
ATTORNEY AT LAW

MARK CHEDIK
BLOOMBERG NEWS

CROWELL & MORING LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111

3 PIER 101
SAN FRANCISCO, CA 94111

RAFI HASSAN
SUSQUEHANNA FINANCIAL GROUP, LLLP
101 CALIFORNIA STREET, SUITE 3250
SAN FRANCISCO, CA 94111

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

TARA S. KAUSHIK
MANATT, PHELPS & PHILLIPS, LLP
ONE EMBARCADERO CENTER, 30TH FLOOR
SAN FRANCISCO, CA 94111

VIDHYA PRABHAKARAN
DAVIS WRIGHT & TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111

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

ROBERT B. GEX
ATTORNEY AT LAW,
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

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

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

STANDISH O'GRADY
FRIENDS OF KIRKWOOD ASSOCIATION
31 PARKER AVENUE
SAN FRANCISCO, CA 94118

ALYSSA T. KOO
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A / PO BOX 7442
SAN FRANCISCO, CA 94120

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

BETH SCHOSHINSKI
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177

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

SUNCHETH BHAT
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MC B9A
SAN FRANCISCO, CA 94177

ROBIN J. WALTHER
1380 OAK CREEK DRIVE, NO. 316
PALO ALTO, CA 94304-2016

RYAN HEIDARI
ENDIMENSIONS LLC
1670 SOUTH AMPHLETT BLVD., SUITE 105
SAN MATEO, CA 94402

BRAD WETSTONE
ALAMEDA MUNICIPAL POWER
2000 GRAND STREET, PO BOX H
ALAMEDA, CA 94501-0263
FOR: ALAMEDA POWER AND TELECOM

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

KERRY HATTEVIK
DIRECTOR OF REG. AND MARKET AFFAIRS
NEXTERA ENERGY
829 ARLINGTON BLVD.
EL CERRITO, CA 94530

TONY CHEN
SR. MANGER, BUSINESS DEVEL.
COOL EARTH SOLAR
4659 LAS POSITAS RD., STE. 94551
LIVERMORE, CA 94551
FOR: COOL EARTH SOLAR

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT

SEAN P. BEATTY
SR. MGR. EXTERNAL & REGULATORY AFFAIRS
GENON CALIFORNIA NORTH LLC

ORINDA, CA 94563

696 WEST 10TH ST., PO BOX 192
PITTSBURG, CA 94565

MATTHEW BARMACK
CALPINE CORPORATION
4160 DUBLIN BLVD., STE. 100
DUBLIN, CA 94568

JENNIFER CHAMBERLIN
LS POWER DEVELOPMENT, LLC
5000 HOPYARD ROAD, SUITE 480
PLEASANTON, CA 94588

PETER W. HANSCHEN
ATTORNEY AT LAW
MORRISON & FOERSTER, LLP
101 YGNACIO VALLEY ROAD, SUITE 450
WALNUT CREEK, CA 94596

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

TIM MASON
BLACK & VEATCH CORP.
2999 OAK ROAD, SUITE 490
WALNUT CREEK, CA 94597

WILLIAM F. DIETRICH
ATTORNEY AT LAW
DIETRICH LAW
2977 YGNACIO VALLEY ROAD, NO. 613
WALNUT CREEK, CA 94598-3535

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

RAMONA GONZALEZ
EAST BAY MUNICIPAL UTILITY DISTRICT
375 ELEVENTH STREET, M/S NO. 205
OAKLAND, CA 94607

BARRY H. EPSTEIN
FITZGERALD, ABBOTT & BEARDSLEY, LLP
1221 BROADWAY, 21ST FLOOR
OAKLAND, CA 94612
FOR: FITZGERLAND, ABBOTT & BEARDSLEY,
LLP

KEN ALEX
OFFICE OF THE ATTORNEY GENERAL
PO BOX 70550
OAKLAND, CA 94612-0550

NELLIE TONG
SENIOR ANALYST
KEMA, INC.
155 GRAND AVE., STE. 500
OAKLAND, CA 94612-3747

DOCKET COORDINATOR
5727 KEITH ST.
OAKLAND, CA 94618

CYNTHIA WOOTEN
LUMENX CONSULTING, INC.
1126 DELAWARE STREET
BERKELEY, CA 94702

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

GEOFF TEIGEN
RCM INTERNATIONAL, LLC
PO BOX 4716
BERKELEY, CA 94704

RACHEL MCMAHON
DIRECTOR, GOV. AFFAIRS-PROJECT DEV.
SOLAR MILLENNIUM, LLC
1625 SHATTUCK AVE, SUITE 270
BERKELEY, CA 94709-1161

SEAN GALLAGHER
VP, MARKET STRATEGY & REG. AFFAIRS
STIRLING ENERGY SYSTEMS
2600 10TH STREET, SUITE 635
BERKELEY, CA 94710

GERALD T. ROBINSON
LAWRENCE BERKLEY NATIONAL LABS
ONE CYCLOTRON ROAD
BERKLEY, CA 94720

ED SMELOFF
SENIOR MANAGER
SUNPOWER CORPORATION
1414 HARBOUR WAY SOUTH
RICHMOND, CA 94804

ELIZABETH RASMUSSEN
PROJECT MGR.
MARIN ENERGY AUTHORITY
781 LINCOLN AVENUE, SUITE 320
SAN RAFAEL, CA 94901
FOR: MARIN ENERGY AUTHORITY

SARA BIRMINGHAM
DIRECTOR, WESTERN POLICY

JULIETTE ANTHONY
CALIFORNIANS FOR RENEWABLE ENERGY

SOLAR ALLIANCE
11 LYNN COURT
SAN RAFAEL, CA 94901

678 BLACKBERRY LANE
SAN RAFAEL, CA 94903

LYNN M. ALEXANDER
LMA CONSULTING
129 REDWOOD AVENUE
CORTE MADERA, CA 94925

TOM FAUST
REDWOOD RENEWABLES LLC
6 ENDEAVOR DRIVE
CORTE MADERA, CA 94925

TIM ROSENFELD
MARIN ENERGY MANAGEMENT TEAM
131 CAMINO ALTO, SUITE D
MILL VALLEY, CA 94941

JOHN M. SPILMAN
LAW OFFICE OF JOHN M. SPILMAN
22 FAIRWAY DRIVE
MILL VALLEY, CA 94941-1309

EDWARD A. MAINLAND
CO-CHAIR, ENERGY-CLIMATE COMMITTEE
CNRCC SIERRA CLUB CALIFORNIA
1017 BEL MARIN KEYS BLVD.
NOVATO, CA 94949

KEITH WHITE
312 KELLER ST
PETALUMA, CA 94952

BARBARA GEORGE
WOMEN'S ENERGY MATTERS
PO BOX 548
FAIRFAX, CA 94978-0548
FOR: WOMEN'S ENERGY MATTERS

ERIC CHERNISS
SOLARGEN ENERGY
20400 STEVENS CREEK BLVD, SUITE 700
CUPERTINO, CA 95014

SHANI KLEINHAUS
SANTA CLARA VALLEY AUDUBON SOCIETY
22221 MCLELLAN ROAD
CUPERTINO, CA 95014

RENEE H. GUILD
CEO
GLOBAL ENERGY MARKETS
15400 WINCHESTER BLVD., NO. 32
LOS GATOS, CA 95030

THOMAS J. VICTORINE
SAN JOSE WATER COMPANY
1221 S. BASCOM AVENUE
SAN JOSE, CA 95128

JASON PAYNE
5450 MAYME AVE 23
SAN JOSE, CA 95129

DAVID OLIVARES
ELECTRIC RESOURCE
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95352
FOR: ELECTRIC RESOURCE PLANNING AND
DEVELOPMENT MODESTO IRRIGATION DISTRICT

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

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

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

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

TOBIN RICHARDSON
RICHARDSON GROUP
1416 VIGO COURT
DAVIS, CA 95618

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

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

DENNIS W. DE CUIR

RICK A. LIND

ATTY AT LAW
A LAW CORPORATION
2999 DOUGLAS BLVD., SUITE 325
ROSEVILLE, CA 95661
FOR: GOLDEN STATE WATER COMPANY

SIERRA ECOSYSTEM ASSOCIATES
PO BOX 2260
PLACERVILLE, CA 95667

DAVID OLIVER
NAVIGANT CONSULTING
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670

KENNY SWAIN
NAVIGANT CONSULTING
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670

ERIN RANSLOW
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

LAURIE PARK
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078
FOR: NAVIGANT CONSULTING, INC.

PAUL D. MAXWELL
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CORDOVA, CA 95670-6078

TOM POMALES
CALIFORNIA AIR RESOURCES BOARD
1001 I STREET
SACRAMENTO, CA 95812

AMBER RIESENHUBER
ENERGY ANALYST
INDEPENDENT ENERGY PRODUCERS ASSOC.
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814

ANTHONY BRUNELLO
CALIFORNIA STRATEGIES LLC
980 NINTH STREET, SUITE 2000
SACRAMENTO, CA 95814

BRUCE MCLAUGHLIN
ATTORNEY AT LAW
BRAUN & BLAISING P.C.
915 L STREET, SUITE 1270
SACRAMENTO, CA 95814
FOR: BRAUN & BLAISING P.C.

DANIELLE OSBORN-MILLS
REGULATORY AFFAIRS COORDINATOR
CEERT
1100 11TH STREET, SUITE 311
SACRAMENTO, CA 95814

JANE E. LUCKHARDT
ATTORNEY AT LAW
DOWNEY BRAND LLP
621CAPITOL MALL, 18TH FLOOR
SACRAMENTO, CA 95814

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

STEVE BRINK
CALIFORNIA FORESTRY ASSOCIATION
1215 K STREET, SUITE 1830
SACRAMENTO, CA 95814
FOR: CALIFORNIA FORESTRY ASSOCIATION

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

TIFFANY K. ROBERTS
CALIFORNIA LEGISLATURE
LEGISLATIVE ANALYST'S OFFICE
925 L STREET, SUITE 1000
SACRAMENTO, CA 95814

DANIELLE MATTHEWS SEPERAS
CALPINE CORPORATION
1215 K STREET, SUITE 2210
SACRAMENTO, CA 95814-3978

BRIAN S. BIERING
ELLISON SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: LARGE-SCALE SOLAR ASSOCIATION

CHRISTOPHER T. ELLISON
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905

JEDEDIAH J. GIBSON
ATTORNEY AT LAW
ELLISON SCHNEIDER & HARRIS LLP
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905
FOR: SIERRA PACIFIC POWER COMPANY

ROB ROTH
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET MS 75
SACRAMENTO, CA 95817
FOR: SACRAMENTO MUNICIPAL UTILITY
DISTRICT

MICHAEL DEANGELIS
SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S STREET
SACRAMENTO, CA 95817-1899
FOR: SACRAMENTO MUNICIPAL UTILITY
DISTRICT

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

LEE TERRY
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVENUE
SACRAMENTO, CA 95821

CAROL J. HURLOCK
CALIFORNIA DEPT. OF WATER RESOURCES
JOINT OPERATIONS CENTER
2033 HOWE AVE., STE. 220
SACRAMENTO, CA 95825-0181

EMILIO E. VARANINI, III
4660 NATOMAS BLVD.
SACRAMENTO, CA 95835

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

ANN L. TROWBRIDGE
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, SUITE 205
SACRAMENTO, CA 95864

DIANA SANCHEZ
DAY CARTER & MURPHY LLP
3620 AMERICAN RIVER DRIVE, STE. 205
SACRAMENTO, CA 95864

JAMES L. BYARD PH.D.
11693 PHELPS HILL ROAD
NEVADA CITY, CA 95959-9150

DAVID R. BRANCHCOMB
SIERRA PACIFIC INDUSTRIES
PO BOX 496028
REDDING, CA 96049

CHRISTIAN MENTZEL
CEM LLC
619 KUPULAU DR
KIHEI, HI 96753

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

MICHAEL ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
1300 SW 5TH AVE., STE 1750
PORTLAND, OR 97201

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

TASHIANA WANGLER
PACIFICORP
825 NE MULTNOMAH SREET, SUITE 2000
PORTLAND, OR 97232

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

TIMOTHY CASTILLE
LANDS ENERGY CONSULTING, INC.
18109 SE 42ND STREET
VANCOUVER, WA 98683

JOHN DUNN
TRANSCANADA CORPORATION
450 1ST ST. S.W.
CALGARY, AB T2P 5H1
CANADA
FOR: CHINOOK POWER TRANSMISSION,
LLC/ZEPHYR POWER TRANSMISSION, LLC

MEREDITH LAMEY
TRANSCANADA CORPORATION
450 1ST STREET S.W.
CALGARY, AB T2P 5H1
CANADA

MARK THOMPSON
POWEREX CORP
1400 - 666 BURRARD STREET
VANCOUVER, BC V6C 2X8
CANADA

State Service

ANNE GILLETTE
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

CHERYL LEE
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

DAVID PECK
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

MATTHEW TISDALE
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

SARA KAMINS
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

TED HOWARD
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

CONNIE LENI
CALIFORNIA ENERGY COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000-0000

LORRAINE GONZALES
CALIFORNIA ENERGY COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000-0000
FOR: CALIFORNIA ENERGY COMMISSION

JAMES MCMAHON
29 DANBURY ROAD
NASHUA, NH 03064
FOR: CALIFORNIA DEPARTMENT OF WATER
RESOURCES

AMY C. BAKER
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANDREW SCHWARTZ
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5215
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANNE E. SIMON
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

CANDACE MOREY
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5119
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

CHRISTOPHER DANFORTH
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

GRETCHEN T. DUMAS
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

JONATHAN J. REIGER
CALIF PUBLIC UTILITIES COMMISSION

JORDAN PARRILLO
CALIF PUBLIC UTILITIES COMMISSION

LEGAL DIVISION
ROOM 5035
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOSEPH A. ABHULIMEN
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOSEPHINE EMELO
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE A. FITCH
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
ROOM 4004
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JULIE HALLIGAN
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KARIN M. HIETA
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PRICING AND CUSTOMER PROGRAM
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

LAURENCE CHASET
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5131
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARCELO POIRIER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5025
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARK R. LOY
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRA
ROOM 4205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

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

MITCHELL SHAPSON
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

PAUL DOUGLAS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE

RAHMON MOMOH
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4102
505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3214

RAJ NAIDU
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF WATER AND AUDITS
AREA 3-B
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

YULIYA SHMIDT
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CLARE LAUFENBER GALLARDO
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-46
SACRAMENTO, CA 95814

HEATHER RAITT
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 45
SACRAMENTO, CA 95814
FOR: CALIFORNIA ENERGY COMMISSION

MARC PRYOR
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS 20
SACRAMENTO, CA 95814

DAVID VIDAVER
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-20
SACRAMENTO, CA 95814-5512

PANAMA BARTHOLOMY
ADVISOR TO COMMISSIONER DOUGLAS
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-33
SACRAMENTO, CA 95814-5512

ROSS A. MILLER
ELECTRICITY ANALYSIS OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET MS 20
SACRAMENTO, CA 96814-5512

SAN FRANCISCO, CA 94102-3214

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

TRACI BONE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5027
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

WILLAIM N. BRIEGER
DEPARTMENT OF JUSTICE
CALIFORNIA ATTORNEY GENERAL'S OFFICE
1300 I ST., STE. 125/ PO BOX 944255
SACRAMENTO, CA 94244-2550
FOR: CALIFORNIA DEPARTMENT OF JUSTICE

CONSTANCE LENI
CALIFORNIA ENERGY COMMISSION
MS-20
1516 NINTH STREET
SACRAMENTO, CA 95814

KATE ZOCCHETTI
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-45
SACRAMENTO, CA 95814

PAMELA DOUGHMAN
CALIFORNIA ENERGY COMMISSION
TECHNOLOGY SYSTEMS DIVISION
1516 9TH STREET, MS 45
SACRAMENTO, CA 95814

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

HOLLY B. CRONIN
STATE WATER PROJECT OPERATIONS DIV
CALIFORNIA DEPARTMENT OF WATER RESOURCES
2033 HOWE AVE., STE. 220
SACRAMENTO, CA 95825-0181

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