

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA



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In the Matter of the Application of
PacifiCorp (U901E), an Oregon Company,
for approval to implement a solar incentive
program.

Application 10-03-002
(Filed March 1, 2010)

**JOINT RESPONSE OF COLLEGE OF THE SISKIYOU, DUNSMUIR COMMUNITY
GARDENS, INC. AND JEFFERSON ECONOMIC DEVELOPMENT INSTITUTE TO
PACIFICORP'S SUPPLEMENT TO APPLICATION FOR APPROVAL TO
IMPLEMENT A SOLAR INCENTIVE PROGRAM, RESPONSE OF THE DIVISION OF
RATEPAYER ADVOCATES TO PACIFICORP'S SUPPLEMENT TO APPLICATION,
AND PACIFICORP'S REPLY TO THE RESPONSE OF THE DIVISION OF
RATEPAYER ADVOCATES TO PACIFICORP'S SUPPLEMENT TO APPLICATION**

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August 19, 2010

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Pursuant to Rule 2.6 of the Commissions Rules of Practice and Procedure, College of the Siskiyou ("COS"), Dunsmuir Community Gardens, Inc. ("DCG") and the Jefferson Economic Development Institute ("JEDI"), (collectively, the "Siskiyou Parties") respectfully submit this late-filed Joint Response ("Joint Response") to PacifiCorp's Supplement to its Application for Approval to Implement A Solar Incentive Program ("PacifiCorp Supplement"), the Response of the Division of Ratepayer Advocates to PacifiCorp's Supplement to Application ("DRA Response"), and PacifiCorp's Reply to the Response of the Division of Ratepayer Advocates to PacifiCorp's Supplement to Application ("PacifiCorp Reply")."¹

The Siskiyou Parties are concerned that certain changes proposed by PacifiCorp and DRA to the proposed Solar Incentive Program could significantly reduce the potential benefits of the program and dilute the available funding and incentives to such an extent that the program

¹ The Siskiyou Parties have also filed concurrently with this Joint Response a *Motion for Party Status of College of the Siskiyou, Dunsmuir Community Gardens, Inc., and Jefferson Economic Development Institute*; and a *Motion for Leave to Late File Joint Response of College of Siskiyou, Dunsmuir Community Gardens, Inc. and Jefferson Economic Development Institute to PacifiCorp's Supplement and Reply to Response of the Division of Ratepayer Advocates to PacifiCorp's Supplement to Application for Approval to Implement a Solar Incentive Program*.

will not be effective. As a result, the Siskiyou Parties urge the Commission to approve a solar incentive program for PacifiCorp in a substantially the same form as PacifiCorp proposed in its initial Application, but with a condition providing for transitioning the administration of the program to a qualified local entity or entities within PacifiCorp's service territory.²

I. INTRODUCTION

The Siskiyou Parties considered PacifiCorp's initial Application to be a significant and positive step toward increasing renewable energy resources, facilitating green job training and enhancing job opportunities in Siskiyou County. It was very well received by the local community as is evidenced by the Resolution of the Dunsmuir City Council "enthusiastically endorsing and supporting" the proposal.³ The Siskiyou Parties did not intervene earlier in this proceeding due to resource limitations and because we were satisfied that PacifiCorp's program as originally proposed was well structured to meet the needs of the local community in regard to increasing renewable energy development, job training and job opportunities in the area taking into account the unique facts and circumstances in Siskiyou County. The Siskiyou Parties recently became aware, however, that PacifiCorp has proposed several modifications to its proposed program in its Supplement to address concerns raised by DRA and that DRA has proposed further more significant changes in its Response to PacifiCorp's Supplement. They are concerned that certain of these changes will significantly reduce the effectiveness of the proposed program and greatly diminish its potential benefits to the local community.

As discussed below, the Siskiyou Parties represent entities (and individuals) who are ratepayers of PacifiCorp and who live and work in Siskiyou County and have direct, firsthand experience with the current economic conditions in the County and know the importance of enhancing economic development and job training in the area. The general unemployment rate

² See PacifiCorp Supplement at 12.

³

is nearly 20% in Siskiyou County and the unemployment for high-school graduates is approximately 40%. Given these high unemployment rates, the Siskiyou Parties believe that it is extremely important for the County to take maximum advantage of opportunities to improve and enhance job training, job growth and economic development. The Siskiyou Parties believe that PacifiCorp's proposed Solar Incentive Program has the potential to advance all of these important objectives.

The Siskiyou Parties appreciate DRA's concerns regarding the potential impact of PacifiCorp's proposed program on electric rates and bills, but are concerned that changing the program in the manner and to the extent DRA has proposed will severely reduce the potential for the program to stimulate additional solar development in the county and enhance green job training and job opportunities. Instead, they believe that implementing a more robust incentive program, in a manner substantially similar to that proposed by PacifiCorp in its initial Application, will provide greater incentives for renewable project development, greater opportunities for green energy training and workforce development, more job opportunities, and more economic stimulus for Siskiyou County.

COS is a public two-year community college located in Weed in Siskiyou County in Northern California. It is part of the California Community Colleges System and has an enrollment of approximately 3,000 students, including part-time students. It is the northernmost college in the state of California and the only college in Siskiyou County. It lies in the service area of California State University, Chico and is one of only ten community colleges in California that provide on-campus dormitories for students. The COS has a "Green Jobs" program that trains students to perform energy audits and other green-skills and would like to enhance this job training by incorporating hands-on experience with renewable projects and systems, including local developed solar PV systems, if possible. The COS is an electric service customer of PacifiCorp and would also like to develop a solar system with up to one Megawatt

(“MW”) of capacity on its campus to both provide electricity to the campus and enhance educational and green job training opportunities for its students by providing hands-on experience operating and managing such a system. COS is also interested in potentially partnering with the JEDI through COS’s Green Jobs program in helping to administer PacifiCorp’s solar program, if and when administration of the program is transitioned to a local entity or entities within the PacifiCorp territory.

JEDI is an organization that provides microenterprise and small business development services to individuals in the rural region of Siskiyou County. It has done so for the past 14 years. Its primary focus has been on providing business and asset development services for the low and very low income residents and helping them to build sustainable businesses and reach economic self-sufficiency.⁴ JEDI has recently obtained a \$150,000 grant from Hewlett Packard to obtain equipment to bridge the digital divide in underserved communities. JEDI believes that the Solar Incentive Program, as originally proposed by PacifiCorp in its Application, would provide substantial opportunities for small businesses in Siskiyou County. JEDI is an electric service customer of PacifiCorp and is interested in partnering with the COS through its Green Jobs program to help administer PacifiCorp’s solar program, if and when the administration of the program is transitioned to a local entity or entities within the PacifiCorp territory.

DCG is a local organization that provides training to young people in high schools and colleges on producing organic agriculture and processed foods on unused land owned by private parties and the government. DCG seeks to support sustainable local agriculture and believes that a solar system incentive program would further its efforts to promote sustainable agriculture in the community, enhance learning opportunities for its students and provide a better means for them to put into practice its philosophy of locally grown, organic, and sustainable produce.

⁴ Since 1997, JEDI has grown from one employee to a staff of seven employees and two contract business consultants.

The Siskiyou Parties strongly support prompt approval by the Commission of a solar incentive program for PacifiCorp with funding and incentives sufficient to provide real stimulus for increased renewable energy development, opportunities for green job training and increased job opportunities in the area. The Siskiyou Parties believe that the incentive program originally proposed by PacifiCorp in its Application with one modification proposed by PacifiCorp in its Supplement would meet these objectives. The Siskiyou Parties support PacifiCorp's proposal to consider transitioning administration of the program to a qualified local entity or entities. They oppose other modifications proposed by DRA in its Response, and to a lesser degree PacifiCorp in its Supplement, that would: (i) reduce the level of the solar incentive payments; (ii) reduce the overall amount of the program funding and budget; (iii) reduce the length of the period for which funding would be approved; (iv) reduce the cap on the capacity of commercial and tax-exempt projects eligible for incentives; and (v) reallocate program capacity from commercial and tax-exempt systems to residential systems. The Siskiyou Parties believe that these modifications would significantly reduce the incentive for renewable power development, undermine the potential for additional green job training and workforce development in the local community, provide little stimulus for solar energy and economic development in Siskiyou County, and greatly diminish the overall effectiveness of the program.

The Siskiyou Parties explain their concerns below and provide the Commission with the benefit of their perspective as residents and ratepayers who live and work in Siskiyou County and would be most affected by the Solar Incentive Program at issue in this proceeding.

The concerns raised by the Siskiyou Parties will not unduly broaden this proceeding since they are already implicit in PacifiCorp's original Application and the subsequent pleadings filed by DRA and PacifiCorp.

The Siskiyou Parties believe that this Joint Response, together with other pleadings that have been filed in the proceeding provide a sufficient record for the Commission to approve a

solar incentive program for PacifiCorp and urge the Commission to do so without evidentiary hearings or any further undue delay. They simply ask that the Commission consider give careful consideration to the perspective of the Siskiyou Parties and the unique facts and circumstances in Siskiyou County in determining the nature and form of the Solar Incentive Program that should be adopted for PacifiCorp in this area.

II. DISCUSSION

A. The Incentive Levels Proposed By PacifiCorp Should Be Approved

PacifiCorp has proposed an initial incentive level of \$2.80 per watt with decreasing incentives below this level over the course of the program. PacifiCorp based its proposal in this regard on a thoughtful evaluation of the particular facts and circumstances in Siskiyou County, including the potential savings that could be achieved by participating customers on their utility bills, the potential payback period for customers considering participation in the program, the average income levels of customers in the area, and judgment regarding the extent to which economic incentives may be required in under these specific circumstances in order to achieve program objectives. PacifiCorp has analyzed the payback period for customer investment in solar systems at different potential incentive levels and notes that its proposed initial incentive of \$2.80 per watt would provide customers with a payback period of 14 years.⁵ In its Reply, DRA has proposed a significant reduction in the initial and subsequent incentive levels. It claims - without any evidentiary support - that the incentive level proposed by PacifiCorp is too high and that reducing the initial incentive level to \$1.69 per watt (rounded up to \$1.75 per watt) should not deter participation in the program.⁶ DRA acknowledges that “program participation and

⁵ PacifiCorp Supplement at 5.

⁶ DRA Response to PacifiCorp Supplement at 4-5.

incentive level are closely related,” but contends that lowering the initial incentive level by 37%, as it advocates, should not deter participation.⁷

The Siskiyou Parties disagree. There are several reasons why DRA is incorrect in this regard. First, PacifiCorp’s retail rates are significantly lower than the rates of other investor owned utilities in California.⁸ The value of the energy saved by PacifiCorp customers through investment in solar is thus lower than for other California utility customers. As a result, a higher incentive level will be necessary in order to provide PacifiCorp customers with a reasonable payback period and sufficient incentive to induce them to invest in solar.⁹ Second, the income of customers in Siskiyou County is lower than in many other areas of the State. As a result, the amount of the incentive necessary in order to induce customer investment in solar must generally be higher. And third, DRA is mistaken in its assumption that lengthening the payback period should not deter program participation. Increasing the payback period by three years, from 14 years to 17 years, can change customer behavior in critical respects and may make the difference in many customers decisions whether to invest in a solar system and participate in the program or not.

DRA also fails to consider the adverse effect of reducing incentive levels on the economic efficiency of the proposed program. DRA recognizes that “incentive costs represent 88.4% of the proposed program budget,”¹⁰ but fails to appreciate that while the proposed program is relatively efficient and will result in a high percentage of budgeted funds going to incentives, this efficiency cannot be maintained if the incentive levels are reduced to the degree DRA has advocated. If incentive levels are reduced, administrative costs as a percentage of total program costs will inevitably increase, potentially significantly so, with the result that a much

⁷ *Id.* at 5.

⁸ *See* PacifiCorp Reply at 4.

⁹ *See* PacifiCorp Supplement at 6.

¹⁰ *See* DRA Response to PacifiCorp Supplement at 5.

smaller percentage of the total program budget is likely to be available for incentives.¹¹ Such a result would be contrary to the objectives of the Commission and the best interests of both program participants and nonparticipants. The Commission should view the efficiency of PacifiCorp's proposed program as a positive thing, and ensure that incentive levels remain at adequate levels to provide the proper incentives for customer participation and to maintain the efficiency of the program.

Finally, reducing the incentive levels may significantly reduce the potential benefits of the program to the local economy. Siskiyou County is experiencing significant unemployment and the local economy is struggling to provide good jobs for its youth graduating from high school and college today. The proposed program has the potential to provide opportunities to enhance job training and job growth in the local area, but these opportunities can only be realized if the program is successful in stimulating additional investment in solar projects by local residents, businesses, nonprofits and government. Reducing the incentive levels to the degree DRA has proposed is likely to significantly reduce customer participation in the program and new investment in solar and undermine the potential economic benefits of the program for the local economy.

Should the Commission be inclined to adopt an initial incentive level lower than the proposed \$2.80 per watt initially proposed by PacifiCorp, the Siskiyou Parties strongly support PacifiCorp's proposal that it be "authorized to file requests to adjust incentive rates \$0.25 per watt higher through an advice letter filing in the event that the initial incentive rate provides too low to attract sufficient participation within the first three months of the program."¹² Setting appropriate incentive levels is not an exact science. If the Commission does not approve the incentive levels proposed by PacifiCorp, it should provide the company with discretion to

¹¹ See PacifiCorp Supplement at 4.

¹² PacifiCorp Reply, at 4.

modify the incentive levels should they prove in practice to be insufficient to stimulate the desired additional solar investment.

B. The Program Budget and Term Proposed by PacifiCorp Should Be Approved

The Siskiyou Parties believe that the program budget proposed by PacifiCorp is reasonable under the circumstances pertaining in Siskiyou County and should be approved by the Commission for the full seven years period requested by PacifiCorp. DRA has proposed reducing the program budget from \$8.48 million to \$3.78 million, less than half the amount requested by PacifiCorp,¹³ and capping annual expenditures at \$700,000.¹⁴ DRA has also proposed limiting the term of the program to three years at this time, instead of seven as proposed by PacifiCorp, and to permit PacifiCorp to request an extension of the program and additional funding in its next general rate case.¹⁵ These changes proposed by DRA would significantly reduce the scope, continuing, predictability and potential benefits of the program and the Siskiyou Parties oppose them.

Reducing the program budget to less than half the amount PacifiCorp requested would send the wrong message to PacifiCorp and its ratepayers. Siskiyou County is already at least four years behind most of the rest of the State in regard to solar energy development. The California Solar Initiative (“CSI”) program was implemented in 2006 in the territories of the three large investor-owned utilities (IOUs) and has a budget of \$2.16 billion over 10 years, with a goal of “One Million Solar Roofs.” As PacifiCorp noted in its Supplement, the \$8.48 million budget PacifiCorp has requested for its program is extremely “modest by comparison.”¹⁶ It is in fact only 0.4% of the CSI budget. The Siskiyou Parties believe that the budget proposed by PacifiCorp is entirely reasonable and should be approved.

¹³ DRA Response at 7.

¹⁴ DRA Response at 7-8.

¹⁵ See DRA Response at 1 and 9.

¹⁶ PacifiCorp Supplement at 2.

The Siskiyou Parties also believe that the program should be approved for a full seven year term. Any conditions or restrictions on the term of the program or the approved budget that could result in a mid-program interruption would be extremely disruptive to the plans of customers who desire to install solar facilities, their contractors and suppliers and PacifiCorp. The Siskiyou Parties therefore urge the Commission to approve the program for a full seven year term.

If, however, the Commission is inclined to approve a budget for a shorter period of time, then the Siskiyou Parties urge the Commission to approve an initial budget for a minimum of a four-year period and to permit PacifiCorp to file for approval of additional funds for the program in its next general rate case or by a separate application, as PacifiCorp suggests in its Reply.¹⁷ Approving a program budget for a term of at least four years is essential for establishing a maintaining a minimum measure of program continuity and predictability.

C. The Cap on Commercial and Tax-Exempt Systems Should Not be Reduced

In its Application, PacifiCorp proposed to cap incentives available for commercial and tax-exempt projects at 1 MW, consistent with the CSI. In its Supplement, however, the Company has proposed reducing this cap to 250 kW.¹⁸ The Siskiyou Parties believe that the Commission should not reduce the cap on incentives available for commercial and tax-exempt systems to 250 kW, but rather should permit PacifiCorp to retain flexibility to accommodate larger projects that nonprofit and government customers may desire to install, potentially up to one MW, as PacifiCorp originally proposed.

The CSI includes a cap of 1 MW. There are good reasons for setting the cap at this level rather than at a lower lever. Most importantly, projects with greater capacity generally have lower installation and overhead costs on a per kW basis than smaller projects and as a result, are

¹⁷ See PacifiCorp Reply at 6.

¹⁸ PacifiCorp Supplement at 4.

more cost effective. Capping incentives at 1 MW rather than at 250 kW will thus reduce installation and overhead costs relative to installed capacity and increase program efficiency. The Siskiyou Parties support a higher cap for this reason.

The Siskiyou Parties also support a higher cap because COS is considering participating in development of a solar project on its campus potentially with capacity up to one MW, and incentives available under PacifiCorp's proposed program could be critical for the success of this project. COS is considering a project potentially up to one MW because a project of this size may better serve COS's campus electricity requirements and provide better job training opportunities for students in COS's Green Jobs program than a smaller project.

COS appreciates, however, that if incentives are made available for projects of nonprofit and government customers up to one MW, a project of this size could significantly reduce the Solar Incentive Program funds available for other projects. As a result, COS intends to explore other potential alternatives for developing its proposed project, in addition to potential incentives under the program proposed by PacifiCorp in this proceeding.

COS urges the Commission, however, to approve an incentive program for PacifiCorp with sufficient flexibility to accommodate larger projects that nonprofit and government customers may desire to develop.

D. Program Capacity Should Not be Reallocated From Commercial to Residential

In its Supplement, PacifiCorp has proposed reallocating the program capacity from 20% residential/ 80% commercial and tax-exempt to 33% residential/ 67% commercial and tax-exempt.¹⁹ The Siskiyou Parties support incentives to increase residential solar systems, but oppose this reallocation of program resources.

There are several reasons for this. Most importantly, the reality is that the costs of solar systems may still be prohibitive for many residential ratepayers in the PacifiCorp's service

¹⁹ PacifiCorp Supplement at 3-4.

territory even with the funding and incentive levels proposed by PacifiCorp in its initial Application. On the other hand, many small businesses and nonprofit or governmental entities, such as the Siskiyou Parties, are interested in and eager to install solar systems in PacifiCorp's territory. In addition, solar installations by nonprofit and governmental entities, such as JEDI, DCG, and COS, will provide benefits that extend more broadly to the local community than installations by individual residential customers. And finally, smaller systems tend to entail higher installation and overhead costs on a per kW basis than larger systems that commercial, nonprofit and governmental entities are likely to install. As a result, reallocating program capacity by decreasing the capacity and funds available for commercial and tax-exempt systems and increasing the capacity and funds for smaller residential systems will tend to reduce the total amount of additional solar capacity and solar generation the program is likely to achieve and the net benefits to the local community as a whole. Maintaining the capacity allocation initially proposed by PacifiCorp, in contrast, is likely to result in a more efficient and successful program.

E. Administration of the Program Should Be Transitioned to a Local Entity

Finally, as noted above, the Siskiyou Parties have a significant interest in enhancing green job training and workforce development in Siskiyou County. They believe that the Solar Incentive Program proposed by PacifiCorp provides an excellent opportunity to do so, if it is structured appropriately and implemented in collaboration with the local community. In its Supplement, PacifiCorp has proposed that the administration of its proposed program be transitioned "in the future to entities within PacifiCorp's California service territory to the extent that such administration is available and cost-effective."²⁰ This proposal is responsive to local community concerns and the Siskiyou Parties strongly support this proposed change to the program.

²⁰ PacifiCorp Supplement at 12.

The Siskiyou Parties believe that qualified entities are definitely available in the area that can administer the program in a cost effective manner and are interested in working with PacifiCorp and the Commission to transfer administration of the program to the local community. COS, for example, is interested in potentially working together in partnership with JEDI to administer the program. JEDI could potentially work with or train students in COS's Green Jobs program to oversee some of aspects of program administration and could work with others in the community to handle other aspects. This could provide synergistic benefits for COS students, JEDI program participants and PacifiCorp ratepayers that neither COS, JEDI, nor PacifiCorp could achieve independently. COS Students could gain hand-on experience with solar system design, installation, inspection, and operation as well how programs of this type are administered. JEDI program participants may benefit through new opportunities to expand their business skills. And PacifiCorp's ratepayers may potentially benefit through lower costs of program administration. The Siskiyou Parties therefore wholeheartedly support PacifiCorp's proposal to transition program administration to a qualified local entity or entities and encourage the Commission to approve the program subject to this condition.

The Siskiyou Parties recommend that the Commission approve this condition with a specific timetable for the transition. A realistic goal would be to identify and select a qualified entity or entities in Siskiyou County to administrator the program within four to five months from the date of the Commission's decision in this proceeding approving a Solar Incentive Program for PacifiCorp, and to complete the transition within 12 months from the date that the program is implemented. The initial program administrator should be required to work closely and cooperatively during the twelve month transition period with the selected Siskiyou County administrator(s) to ensure that the transition proceeds smoothly and efficiently.

Conditioning approval of the program in this manner will help ensure that the program achieves its potential for green job training, workforce development and job opportunities in Siskiyou County.

F. Approval Should Be Promptly Granted

The Siskiyou Parties have a number of concerns about the changes to the Solar Incentive Program proposed by DRA in its Response and to a lesser degree PacifiCorp in its Supplement in this proceeding, but do not believe that these issues warrant or require evidentiary hearings. PacifiCorp's Application and Supplement, the pleadings filed by DRA in response to its Application, PacifiCorp's Reply to DRA's Response, and this Joint Response of the Siskiyou Parties should provide a sufficient record for the Commission to approve a Solar Incentive Program for PacifiCorp appropriate for the unique facts and circumstances pertaining in Siskiyou County without the need for hearings. The Siskiyou Parties therefore request that the Commission issue a decision in this matter on the basis of the written record in the proceeding, including the Siskiyou Parties' Joint Response, without evidentiary hearings or further delay.

The CSI program has been running for over four years. To date, there have been approximately 66,214 solar projects installed, and 670 MW or solar capacity installed under this program. The CSI is the most successful solar incentive program in the country. While these results are impressive, the Siskiyou Parties urge the Commission not to forget that the CSI does not extend to all of California and that residents, businesses, nonprofits and governmental entities in areas of the State to which the CSI has not been extended have not been able to participate in or share these CSI benefits. These areas, including Siskiyou County, are four years behind the rest of the State in regard to solar project and workforce development. The Siskiyou Parties believe that it is important for the Commission to address this concern by promptly

approving a Solar Incentive program for PacifiCorp. Prompt approval will also ensure adequate time for implementation of the program before the construction season begins next spring.

III. CONCLUSION

For the foregoing reasons, the Siskiyou Parties urge the Commission to adopt a Solar Incentive Program for PacifiCorp in a manner substantially similar to that proposed by PacifiCorp in its original Application subject to the additional condition that administration of the program be transferred to a qualified entity or entities in Siskiyou County within one year of the date that the program is implemented.

Respectfully submitted,

/s/

Randall Lawrence

For College of the Siskiyous;
Dunsmuir Community Gardens, Inc.; and
Jefferson Economic Development Institute

Dated: August 19, 2010

ATTACHMENT A

DUNSMUIR CITY COUNCIL RESOLUTION 2010-34

(April 1, 2010)

CERTIFICATE OF SERVICE

I, Robin Huey, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 505 Montgomery Street, Suite 800, San Francisco, California 94111-6533.

On August 19, 2010, I caused the following to be served:

JOINT RESPONSE OF COLLEGE OF THE SISKIYOU, DUNSMUIR COMMUNITY GARDENS, INC. AND JEFFERSON ECONOMIC DEVELOPMENT INSTITUTE TO PACIFICORP’S SUPPLEMENT TO APPLICATION FOR APPROVAL TO IMPLEMENT A SOLAR INCENTIVE PROGRAM, RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES TO PACIFICORP’S SUPPLEMENT TO APPLICATION, AND PACIFICORP’S REPLY TO THE RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES TO PACIFICORP’S SUPPLEMENT TO APPLICATION

via electronic mail to all parties on the service list A.10-03-002 who have provided the Commission with an electronic mail address and by First class mail on the parties listed as “Parties” and “State Service” who have not provided an electronic mail address.

/s/ Robin Huey
Robin Huey

VIA EMAIL AND U.S.MAIL

President Michael R. Peevey California Public Utilities Commission 505 Van Ness Ave San Francisco, CA 94102	Administrative Law Judge Dorothy Duda California Public Utilities Commission 505 Van Ness Ave San Francisco, CA 94102
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CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

**PROCEEDING: A1003002 - PACIFICORP - FOR AUT
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