



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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In the Matter of the Application of The Nevada)
Hydro Company for a Certificate of Public)
Convenience and Necessity for the Talega-)
Escondido/Valley-Serrano 500 kV Interconnect)
Project.)
_____)

Application 10-07-001
(Filed July 6, 2010)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO THE
MOTION OF THE NEVADA HYDRO COMPANY FOR LEAVE TO FILE A REPLY
BRIEF IN RESPONSE TO THE REPLY BRIEFS OF CERTAIN INTERVENORS**

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Dated: **January 7, 2011**

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STATE OF CALIFORNIA**

In the Matter of the Application of The Nevada)	
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BRIEF IN RESPONSE TO THE REPLY BRIEFS OF CERTAIN INTERVENORS**

Pursuant to Rule 1.11(e) of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Southern California Edison (“SCE”) responds to The Nevada Hydro Company’s (“TNHC’s”) motion for leave to file a reply brief in response to intervenor reply briefs. TNHC’s motion and proposed additional reply brief implicitly seek to strike portions of SCE’s Reply Brief on Threshold Issues.¹ TNHC’s motion should be denied as inaccurate.

Specifically, TNHC’s motion challenges SCE’s request that TNHC be required to explain the legal basis upon which it would obtain revenues to cover the cost of its intervenor

¹ Motion of The Nevada Hydro Company for Leave to File a Reply Brief in Response to the Reply Briefs of Certain Intervenors, *In the Matter of the Application of The Nevada Hydro Company for a Certificate of Public Convenience and Necessity for the Talega-Escondido/Valley-Serrano 500 kV Interconnect*, No. A.10-07-001, at *passim* (Cal. Pub. Util. Comm’n, *fld.* Dec. 23, 2010). TNHC’s proposed reply is attached as Exhibit A to that motion (“Motion” and “TNHC Proposed Reply,” respectively).

compensation obligations, among other things.² TNHC ignores, however, the fact that this request addresses TNHC's apparent inability to pay intervenor compensation, and was thus properly made.³ The only plan identified by TNHC in its statements at the September 22, 2010, prehearing conference, supplemental testimony, and initial briefing on threshold issues for paying intervenors (or even to fund construction of its project) seems to be TNHC's intention to seek cost recovery through the Transmission Access Charge ("TAC") administered by the California Independent System Operator ("CAISO").⁴ Because TNHC has thus far refused to

² TNHC Proposed Reply, *supra* note 1, at 2-3.

³ Reply Brief of the Southern California Edison Company (U 338-E) on Threshold Issues, *In the Matter of the Application of The Nevada Hydro Company for a Certificate of Public Convenience and Necessity for the Talega-Escondido/Valley-Serrano 500 kV Interconnect*, No. A.10-07-001, at 2-3, 5-9 (Cal. Pub. Util. Comm'n, *fld.* Dec. 10, 2010) ("SCE Reply Brief").

⁴ See SCE Reply Brief, *supra* note 3, at 2-3, 5-8 & n.3, n.5, n.19 (previously making argument and citing TNHC sources). Statements from TNHC referenced in SCE's Reply Brief that directly, or indirectly, reference the CAISO TAC include:

Application of The Nevada Hydro Company for a Certificate of Public Convenience and Necessity, *In the Matter of the Application of The Nevada Hydro Company for a Certificate of Public Convenience and Necessity for the Talega-Escondido/Valley-Serrano 500 kV Interconnect*, No. A.10-07-001, at 2 (Cal. Pub. Util. Comm'n, *fld.* July 6, 2010) (stating that TNHC would "transfer control of its proposed line to the CAISO "while TNHC recovers its costs plus a reasonable rate of return through the CAISO Transmission Access Charge") ("TNHC Application").

Transcript of September 22, 2010, Prehearing Conference, *In the Matter of The Application of the Nevada Hydro Company for a Certificate of Public Convenience and Necessity for the Talega-Escondido/Valley-Serrano 500 kV Interconnect*, No. A.10-07-001, at 70:1-7 (Cal. Pub. Util. Comm'n, *held* Sept. 22, 2010) ("Prehearing Conference Tr.")

Brief of The Nevada Hydro Company in Response to the Administrative Law Judge's Ruling Establishing Date for Service of Supplemental Testimony and Setting Briefing Dates Dated October 6, 2010, *In the Matter of the Application of The Nevada Hydro Company for a Certificate of Public Convenience and Necessity for the Talega-Escondido/Valley-Serrano 500 kV Interconnect*, No. A.10-07-001, at 6 (Cal. Pub. Util. Comm'n, *fld.* Nov. 19, 2010) (TNHC Threshold Issue Brief") (indicating TNHC seeks cost recovery from the CAISO).

Direct testimony of E. Scott Medla, *In the Matter of the Application of The Nevada Hydro Company for a Certificate of Public Convenience and Necessity for the Talega-Escondido/Valley-Serrano 500 kV Interconnect*, No. A.10-07-001, at 6:12-20; 8:9-16 (Cal. Pub. Util. Comm'n, *fld.* Nov. 30, 2010) (testimony of TAG Energy Partners, TNHC's financial consultant) ("Medla Testimony"). This testimony claims that investors are interested in TNHC's project. SCE assumed that such interest would not materialize if TNHC was unable to obtain cost recovery through the CAISO TAC, irrespective of whether a CPCN were granted or not. See SCE Reply Brief, *supra* note 3, at 6-7.

initiate the process for requesting such recovery – specifically, by submitting its transmission project to the CAISO to review through the CAISO transmission planning process – there appears to be no way for TNHC to make claim to such recovery.⁵ In light of this uncertainty, SCE properly asked that TNHC be ordered to explain the legal basis by which it will claim such recovery.⁶

In addition to its procedural motion to strike, TNHC’s filing includes a proposed substantive response to SCE’s request, claiming – without support – that the CAISO tariff and the ratemaking authority of the Federal Energy Regulatory Commission (“FERC”) will give the CAISO “no genuine option” but to confer benefits on TNHC, including cost recovery through the TAC.⁷ SCE does not object to making TNHC’s substantive response a part of the administrative record. To the contrary, SCE welcomes its inclusion as this response – consisting of one sentence that is contradicted by the CAISO tariff, and by CAISO and FERC decisions previously raised by the parties – further confirms that TNHC has no present ability to seek recovery through the TAC, or to pay intervenors or fund construction of its proposed project.⁸

⁵ Letter from Daune Kirrene, CAISO, to Rexford Wait, The Nevada Hydro Company, dated September 10, 2009 (“CAISO Rejection Letter”)(explaining to TNHC that Sections 4.3.1(2) and 24 of the CAISO tariff require TNHC to submit its project to the CAISO for review through the CAISO’s transmission planning process).

A copy of the CAISO Rejection Letter is attached hereto as Exhibit A. The CAISO Rejection Letter was first provided to the Commission at: Concurrent Brief on Threshold Issues of Santa Ana Mountains Task Force of the Sierra Club & Friends of the Forest (Trabuco District) and the Santa Rosa Plateau, *In the Matter of the Application of The Nevada Hydro Company for a Certificate of Public Convenience and Necessity for the Talega-Escondido/Valley-Serrano 500 kV Interconnect*, No. A.10-07-001, at 6 (Cal. Pub. Util. Comm’n, *fld.* Nov. 19, 2010) (“Sierra Club Threshold Issues Brief”). The CAISO Rejection Letter is also available online at: <http://www.caiso.com/242c/242cd6ee54200.pdf> (last visited Jan. 7, 2011).

⁶ SCE Reply Brief, *supra* note 3, at 3, 8-9.

⁷ TNHC Proposed Reply, *supra* note 1, at 3.

⁸ *Id.* (one sentence response). The CAISO references are as follows: CAISO tariff, at §4.3.1(2) and § 24; CAISO Rejection Letter, *supra* note 5 (previously raised at Sierra Club Threshold Issue Brief, *supra* note 5, at 6).

Continued on the next page

Finally, in light of the flaws found in TNHC’s motion and proposed reply, SCE affirms the position taken in SCE’s Reply brief: this application is not ready to move forward.⁹ TNHC has not provided any plan for paying intervenors (or to fund construction of its project) other than its intention to seek cost recovery through the CAISO TAC.¹⁰ But TNHC’s one-sentence briefing on that issue provides no assurance that it will be able to obtain such recovery.¹¹ Since TNHC has presented no evidence that it is financially viable and capable of paying intervenors (or to even fund its proposed multi-million dollar project), it does the parties, this Commission, and California’s ratepayers, no good to expend further time and resources on an incomplete and unviable application.

I.

TNHC’S MOTION TO STRIKE SHOULD BE DENIED BECAUSE SCE’S REPLY BRIEF RESPONDS TO THE THRESHOLD ISSUE OF INTERVENOR COMPENSATION AND REPLIES TO PRIOR TNHC FILINGS

TNHC’s motion to strike SCE’s request that TNHC be ordered to explain the legal basis by which it will claim cost recovery through the CAISO TAC should be denied as inaccurate.

TNHC claims that this request does not respond to any of the threshold issues identified by the

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The relevant FERC decisions include: (1) The Nevada Hydro Company, 131 F.E.R.C. ¶ 61,124, at p.10 (2010) (“*FERC 2010 Rejection Order*”); and (2) The Nevada Hydro Company, 129 F.E.R.C. ¶ 61,098, at P.25 & n.33 (2010) (“*FERC 2009 Rejection Order*”).

These decisions were previously reported to the Commission at: SCE Reply Brief, *supra* note 3, at 8 & n.25; and at Protest of San Diego Gas & Electric Company, *In the Matter of the Application of The Nevada Hydro Company for a Certificate of Public Convenience and Necessity for the Talega-Escondido/Valley-Serrano 500 kV Interconnect*, No. A.10-07-001, at 7 & n.12 (Cal. Pub. Util. Comm’n, *fld.* Aug. 6, 2010) (“SDG&E Protest”).

⁹ SCE Reply Brief, *supra* note 3, at 3, 10.

¹⁰ See sources cited *supra* note 4.

Commission for initial briefing, but that claim ignores the fact that TNHC's only identified plan for paying intervenors rests solely on its purported, but unsubstantiated, future entitlement to cost recovery through the CAISO TAC.¹² The process for seeking such recovery requires TNHC to submit its project to the CAISO for review and approval through its transmission planning process.¹³ But to SCE's knowledge, TNHC has still not submitted its project to the CAISO for review. If TNHC cannot secure TAC recovery, then by its own testimony and briefing, TNHC cannot pay intervenors or even fund its project, irrespective of whether it is granted a CPCN.¹⁴ SCE correctly brought this concern to the Commission's attention, and correctly proposed a plan permitting TNHC to address that concern.

SCE also raised this concern at the proper time – in response to statements made in TNHC's Opening Brief on Threshold Issues and its Supplemental Testimony.¹⁵ These documents suggested that TNHC had still not submitted its project to the CAISO for review, and had still not developed a new plan for paying intervenors (or to fund construction of its project) other than its unsubstantiated assumption that it would be able obtain TAC recovery.¹⁶ For example, TNHC's Supplemental Testimony contained no evidence of financial viability other than a bare claim that several unnamed investors were purportedly interested in TNHC's

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¹¹ TNHC Proposed Reply, *supra* note 1, at 3.

¹² TNHC Proposed Reply, *supra* note 1, at 2-3 (making claim). *See also* sources cited *supra* note 4.

¹³ *E.g.*, CAISO Rejection Letter, *supra* note 5 (referring to CAISO tariff § 4.3.1(2) & § 24) (previously raised at Sierra Club Threshold Issues Brief, *supra* note 5, at 6).

¹⁴ *See* sources cited, *supra* note 4.

¹⁵ *See* TNHC Threshold Issues Brief, *supra* note 4, at 6 & n.19-20 & n.22-24; *see also* Medla Testimony, *supra* note 4, at 3:4-9; 5:1-2; 8:9-16 (previously raised at SCE Reply Brief, *supra* note 3, at 6-7 & n.19-20 & n.24).

¹⁶ Sources cited, *supra* note 15.

project.¹⁷ SCE, however, noted that a potential investor is not the same as an actual investor, and that it was questionable whether such investments would actually materialize if TNHC was unable to secure cost recovery.¹⁸ Without such investment, TNHC seemingly has no way to pay intervenors or fund its project. In light of this observation – which TNHC has yet to deny – SCE asked that TNHC be ordered to explain the legal basis by which it will claim such recovery.¹⁹

Since cost recovery through the CAISO TAC remains the only stated basis by which TNHC will purportedly pay intervenors and promote investment into its project, SCE’s request that TNHC be required to explain the basis of its purported future entitlement to TAC recovery was properly and timely made.²⁰ TNHC’s motion to strike should be denied on that ground.

II.

TNHC’S SUBSTANTIVE RESPONSE TO SCE’S RECOMMENDATION SHOULD BE MADE A PART OF THE ADMINISTRATIVE RECORD

If SCE’s request is deemed to be a new issue, SCE would not object to providing TNHC an opportunity to submit its proposed response.²¹ Indeed, such response is exactly what SCE requested in the first place.²² Since TNHC’s proposed reply contains what appears to be a

¹⁷ Medla Testimony, *supra* note 4, at 3:4-9; 5:1-2; 8:9-16 (previously raised at SCE Reply Brief, *supra* note 3, at 6-7 & n.19 & n.20).

¹⁸ SCE Reply Brief, *supra* note 3, at 6-7.

¹⁹ *Id.* at 2-3, 8-9.

²⁰ *See* sources cited *supra* note 4.

²¹ *In re Application of S. Cal. Gas Co. & Pac. Lighting Gas Supply Co. to Increase Revenue Under the Consolidated Adjustment Mechanism to Offset Changed Gas Costs Resulting From Increases in the Price of Natural Gas Purchased from El Paso Natural Gas Co., Transwestern Pipeline Co., Pac. Interstate Transmission Co., & Cal. Sources; and to Adjust Revenues to Recover the Undercollection in the CAM Balancing Account*, D.8312062, 1983 Cal. PUC LEXIS 813, at *1 (1983)(permitting additional briefing to address new issue raised in reply brief).

²² SCE Reply Brief, *supra* note 3, at 2-3, 8-9.

substantive response going to the merits of SCE’s request, SCE welcomes making that response a part of the administrative record.²³

SCE, however, is concerned with the brevity of that response – all one sentence of it.²⁴ TNHC’s failure to provide a comprehensive analysis, despite having thirteen days to prepare one, fails to inspire confidence in its purported ability to pay intervenor costs or fund its project.²⁵ TNHC still apparently refuses to recognize the CAISO’s duty to review and approve TNHC’s project, claiming instead that the CAISO tariff and FERC’s ratemaking authority give the CAISO “no genuine option” but to confer benefits onto TNHC, including cost recovery through the TAC.²⁶ But TNHC did not provide any authority to support that claim. More importantly, TNHC’s claim is contradicted by the CAISO tariff, and by CAISO and FERC decisions involving TNHC that were previously brought to this Commission’s attention.²⁷

For example, as noted in a CAISO decision brought to this Commission’s attention by the Santa Ana Mountains Task Force of the Sierra Club & Friends of the Forest and the Santa Rosa Plateau, TNHC had previously submitted an application with the CAISO to become a participating transmission owner.²⁸ But the CAISO rejected TNHC’s application, stating that TNHC had not submitted its TE/VS project for review by the CAISO through its transmission planning process.²⁹ In that rejection, the CAISO reminded TNHC that such review was required

²³ TNHC Proposed Reply, *supra* note 1, at 3.

²⁴ *Id.*

²⁵ The parties submitted their reply briefs on threshold issues on December 10, 2010. TNHC submitted the instant motion and proposed reply brief thirteen days later on December 23, 2010.

²⁶ TNHC Proposed Reply, at 3.

²⁷ CAISO Rejection Letter, *supra* note 5 (referring to CAISO tariff sections 4.3.1(2) and 24) (previously reported at Sierra Club Brief, *supra* note 5, at 6). *FERC 2009 Rejection Order*, 129 F.E.R.C. ¶ 61,098, at ¶¶ 22-25 (previously raised at SD&GE Protest, *supra* note 8, at 7 & n.12). *FERC 2010 Rejection Order*, 131 F.E.R.C. ¶ 61,124, at ¶10 (emphasis added) (previously raised at SCE Reply Brief, *supra* note 3, at 7-8 & n.25, and at SDG&E Protest, *supra* note 8, at 7 & n.12).

²⁸ CAISO Rejection Letter, *supra* note 5 (previously reported at Sierra Club Brief, *supra* note 5).

²⁹ *Id.*

by Sections 4.3.1(2) and 24 of the CAISO tariff.³⁰ To SCE's knowledge, TNHC's failure continues to remain unabated. In light of TNHC's refusal to follow proper procedure, there appears to be no way for TNHC to claim any type of entitlement to cost recovery under the CAISO TAC.

Similarly, SCE and SDG&E noted that FERC has already addressed, to TNHC's detriment, the issue of whether its ratemaking authority would excuse TNHC from submitting its project for review by the CAISO's transmission planning process.³¹ In FERC's Order on Compliance (Docket Numbers ER06-278-007 and ER08-654-003), issued in November of 2009, FERC confirmed that its decision providing certain rate incentives to TNHC, in connection with its proposed TE/VS Interconnect, "***did not obviate the need for study of the proposed TE/VS Interconnect under the CAISO's transmission planning process.***"³² To make its position clear, FERC emphasized that it ***denied Nevada Hydro's request for clarification that further CAISO studies were unnecessary and foreclosed, and it also denied TNHC's request for a waiver of the CAISO's Tariff.***³³ Finally, FERC ***repeated these decisions*** six months later in an Order Denying Rehearing in Docket Numbers ER06-278-008 and ER-654-004 involving TNHC.³⁴ Thus, unless TNHC is prepared to submit its project to the CAISO for review and approval, or to provide some other method for seeking cost recovery relief unknown to SCE, TNHC has not provided evidence that it is financially viable to ensure that it will be able to satisfy its intervenor compensation obligations or even secure funding for its project.

³⁰ *Id.*

³¹ *FERC 2009 Rejection Order*, 129 F.E.R.C. ¶ 61,098, at ¶¶ 22-25 (previously raised at SD&GE Protest, *supra* note 8, at 7 & n.12). *FERC 2010 Rejection Order*, 131 F.E.R.C. ¶ 61,124, at ¶10 (emphasis added) (previously raised at SCE Reply Brief, *supra* note 3, at 7-8 & n.25, and at SDG&E Protest, *supra* note 8, at 7 & n.12).

³² *FERC 2009 Rejection Order*, 129 F.E.R.C. ¶ 61,098, at ¶¶ 22-26 (previously raised at SD&GE Protest, *supra* note 8, at 7 & n.12).

³³ *Id.* See also *FERC 2010 Rejection Order*, 131 F.E.R.C. ¶ 61,124, at ¶10 (stating that its earlier decision in the FERC 2009 Rejection Order amounted to a denial of TNHC's request for a waiver of the CAISO tariff) (previously raised at SCE Reply Brief, *supra* note 3, at 7-8 & n.25, and at SDG&E Protest, *supra* note 8, at 7 & n.12).

³⁴ *FERC 2010 Rejection Order*, 131 F.E.R.C. ¶ 61,124, at ¶10 (previously raised at SCE Reply Brief, *supra* note 3, at 7-8 & n.25, and at SDG&E Protest, *supra* note 8, at 7 & n.12).

III.

CONCLUSION

Because TNHC's only known plan for paying intervenors, or to fund its project, rests on obtaining cost recovery through the CAISO TAC, SCE properly asked that TNHC be ordered to explain the basis by which it will seek such recovery. Thus, TNHC's motion to strike SCE's request from SCE's Reply Brief should be denied.

TNHC's substantive response to SCE's request should be admitted in its entirety. However, the fact that TNHC's response consists of a single sentence, that is contradicted by cases previously brought to this Commission's attention, casts further doubt on TNHC's ability to pay intervenors (or to fund construction of its project) even if a CPCN were granted. SCE remains more concerned than ever that this application is not ready to move forward.

Respectfully submitted,

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/s/ Robert J. Kang

By: Robert J. Kang

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January 7, 2011

Exhibit A

Letter from Daune Kirrene, CAISO, to Rexford Wait, Vice President, The Nevada Hydro Company, Inc., dated September 10, 2009

Previously Reported at Concurrent Brief on Threshold Issues of Santa Ana Mountains Task Force of the Sierra Club & Friends of the Forest (Trabuco District) and the Santa Rosa Plateau, *In the Matter of the Application of The Nevada Hydro Company for a Certificate of Public Convenience and Necessity for the Talega-Escondido/Valley-Serrano 500 kV Interconnect*, No. A.10-07-001, at 6 (Cal. Pub. Util. Comm'n, fld. Nov. 19, 2010).



California ISO
Your Link to Power

California Independent System Operator Corporation

September 10, 2009

Mr. Rexford Wait
Vice President
The Nevada Hydro Company, Inc.
2416 Cades Way
Vista, CA 92083

Dear Mr. Wait:

The California Independent System Operator Corporation (ISO) received the Nevada Hydro Company's (TNHC) revised application for participating transmission owner status dated July 12, 2009. However, the application is premature, as the Talega-Escondido/Valley-Serrano 500 kV Interconnect Project (Project) that TNHC proposes to place under the ISO's operational control has not yet been approved through the ISO's transmission planning process pursuant to Section 24 of the ISO tariff and is not actively being studied within the ISO's transmission planning study process. Section 4.3.1(2) of the ISO's tariff requires that facilities turned over to the ISO's operational control satisfy criteria adopted by the ISO's governing board, which include the provisions of tariff Section 24. The ISO is therefore rejecting TNHC's application at this time. TNHC may resubmit this application once the Project has been approved through the ISO's transmission planning process.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Daune Kirrene".

Daune Kirrene

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO THE MOTION OF THE NEVADA HYDRO COMPANY FOR LEAVE TO FILE A REPLY BRIEF IN RESPONSE TO THE REPLY BRIEFS OF CERTAIN INTERVENORS** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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

Executed this **7th day of January, 2011**, at Rosemead, California.

/s/ Andrea Moreno

Andrea Moreno
Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
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California Public Utilities Commission

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