

**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.

Rulemaking 08-08-009
(Filed August 21, 2008)

**RESPONSE OF SILVERADO POWER LLC TO
APPLICATION FOR REHEARING OF DECISION NO. 10-12-048 FILED BY
NEXTERA ENERGY RESOURCES**

KEVIN T. FOX
THADEUS B. CULLEY
Keyes & Fox LLP
436 14th Street, Suite 1305
Oakland, CA 94612
Telephone: (510) 314-8201
Facsimile: (510) 225-3848
E-mail: kfox@keyesandfox.com

Attorneys for
SILVERADO POWER LLC

February 2, 2011

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OF THE STATE OF CALIFORNIA**

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Pursuant to California Public Utilities Commission (the “Commission” or “CPUC”) Rule of Practice and Procedure 16.1(d), Silverado Power LLC (“Silverado”) respectfully submits this response supporting the Application for Rehearing of Decision No. 10-12-048 filed by Nextera Energy Resources (“NextEra”) on January 18, 2011.

Silverado is a developer of utility-scale solar projects and has 600 megawatts (“MW”) of utility-scale projects in various stages of development across the United States. Silverado expects all of the projects it currently has under development to be eligible for qualifying facility (“QF”) status under the Public Utility Regulatory Policy Act (“PURPA”).¹ Silverado is interested in participating in various Commission-approved renewable energy procurement programs, but Silverado also desires to pursue bilateral negotiations with utilities for the sale of output from projects that may not fit neatly into one of the Commission’s approved programs.

¹ See 18 C.F.R. § 292.204(a).

I. Background

In an effort to expand opportunities for small-scale renewable generation to participate in California’s renewable portfolio standard (“RPS”), the Commission initiated a proceeding to consider whether it should expand the feed-in tariff program it implemented pursuant to California Assembly Bill (“AB”) 1969 (2006), which was subsequently expanded by Senate Bill (“SB”) 380 (2008) and SB 32 (2009), to include larger RPS-eligible generators. On August 27, 2009, Administrative Law Judge (“ALJ”) Mattson issued a Ruling Regarding Pricing Approaches and Structures for a Feed-in Tariff in this proceeding. The Ruling requested comment on pricing proposals and included, as an attachment, a proposal by the Energy Division for a renewable auction mechanism (“RAM”). Following a lengthy discussion of the merits of different wholesale pricing approaches, ALJ Mattson issued a Proposed Decision (“PD”) on August 24, 2010 proposing adoption of the RAM as a means of better incorporating RPS-eligible resources less than 20 MW into the state’s RPS program.

ALJ Mattson’s PD included no discussion of a potential prohibition on bilateral contracting options for small generators. To the contrary, the PD repeatedly referred to bilateral contracting as a continuing option for sellers that either do not qualify for or are not selected in a RAM solicitation.²

² See, e.g., PD at p.9 (“It is important to note that we provide RAM as an **additional** tool . . . **but do not foreclose** any project from using an alternate approach which works better for the seller. . . includ[ing]. . . bilateral negotiations, the qualifying facility (QF) market.”) [emphasis added]; PD at p. 17 (“This will naturally channel projects that will take a longer amount of time to other procedures (e.g., annual bid solicitation, bilateral negotiation).”); PD at p.62 (“sellers have other opportunities that permit negotiations if and when necessary (e.g., bilateral negotiations. . .).”).

On December 16, 2010, the Commission issued Decision 10-12-048 (the “RAM Decision”), which substantially modified the PD and, in doing so, created ambiguity as to whether the Commission intended to preclude opportunities for small-scale projects less than 20 MW in capacity to enter into bilateral contracts with utilities outside of the RAM procurement process.³

On January 18, 2011, PG&E, SCE and NextEra filed applications for rehearing on certain aspects of the RAM Decision. NextEra’s application focused on the ambiguity in the RAM Decision regarding the ability of utilities and small power producers, in particular QFs, to continue entering into bilateral contracts with electric utilities. NextEra requested that the Commission grant rehearing and clarify that it did not intend in issuing the RAM Decision to preclude opportunities for QFs to enter into bilateral negotiations with utilities subject to the RAM Decision. For the reasons set forth below, Silverado supports NextEra’s Application for Rehearing of Decision No. 10-12-048 and urges the Commission to clarify in the findings of fact and conclusions of law in the RAM Decision that QFs may continue to negotiate and enter bilateral contracts with California’s electric utilities.

II. Discussion

The RAM Decision creates uncertainty for renewable project developers that desire to enter into bilateral contracts with the state’s Investor Owned-Utilities (“IOUs”)

³ See RAM Decision Conclusion of Law No. 5, p. 86: “The IOUs should be required to use RAM exclusively for the procurement of system-side renewable projects up to 20 MW in size with the exception of other Commission-approved programs such as the utility solar photovoltaic programs . . . and annual RPS solicitations. IOUs should not use voluntary programs that target the same market segment or bilateral negotiations.”

due to what appears to be an inadvertent error in the RAM Decision. On the one hand, the RAM Decision states that it would be “contrary to the intent of this program to allow projects in this size range [20 MW and less] to use other procurement options, in particular voluntary programs that target the same market segment or bilateral negotiations.”⁴ On the other hand, the RAM Decision states that “nothing in this decision alters the decisions and obligations related to . . . purchases from QFs pursuant to PURPA.”⁵ Thus, from the body of the RAM Decision, it appears that QFs are exempt from RAM’s prohibition on bilateral contracts. However, only the prohibition on bilateral contracts is carried into the RAM Decision’s conclusions of law. There is no conclusion of law to give affect to the exemption for QFs.⁶ According to NextEra, the uncertainty created by this omission has undermined its ability to bilaterally negotiate contracts with Southern California Edison despite the QF status of NextEra’s facilities at issue.

Silverado agrees with NextEra that the ambiguity in the RAM Decision regarding QF contracting can be easily remedied if the QF exemption in the body of the RAM Decision is included in the RAM Decision’s conclusions of law. Specifically, Silverado supports NextEra’s first proposed conclusion of law, which states:

“Nothing in this RAM Decision should apply to contracts with facilities that qualify as small power producers pursuant to PURPA and 18 CFR 292.201 et. seq. The IOUs are permitted to continue bilateral negotiation with QFs under 20 MW.”⁷

⁴ RAM Decision at pp.3-4.

⁵ RAM Decision at p.22, n. 40.

⁶ See RAM Decision, Conclusions of Law Nos. 5 and 6, pp. 86-87.

⁷ See NextEra Application, Exhibit A.

Silverado believes that an intentional prohibition against bilateral contracting opportunities between QFs and utilities would represent a significant shift in the Commission's policy allowing IOUs the flexibility to use bilateral contracting along side competitive solicitations to meet procurement requirements,⁸ and, as such, would need to be clearly scoped into a proceeding to ensure that interested persons are provided reasonable opportunity to provide comment.⁹ In this instance, it is unclear whether the Commission intended to introduce a significant shift in its procurement contracting policy without such a significant shift in policy having been scoped into the proceeding.¹⁰

Silverado also notes that the PD included no indication of a potential prohibition on bilateral contracting opportunities for small renewable generators. The ambiguity present in the RAM Decision was introduced by last minute changes to the PD that were not subject to comment. Had the Commission intended to alter its procurement contracting policies, it would have been necessary to provide parties an opportunity to comment through issuance of an alternate PD.¹¹ Since no alternate PD was issued, there

⁸ See, e.g., D.09-06-049 at p. 2 (June 22, 2009) (“The RPS has a variety of procurement vehicles, including competitive solicitations and bilateral contracts.”); D.07-09-040 at p.12 (Sept. 20, 2007) (adopting market-based contract options in “addition to the competitive solicitation and bilateral contracting options already available to QFs.”); D.04-01-050 (Jan. 22, 2004) (holding that QFs with expiring contracts may enter into new bilateral contracts rather than accept a standard offer contract or bid in competitive solicitation).

⁹ See, e.g., Commission Rule 7.3 (requiring that issues be properly scoped); Utilities Code § 311(e) (requiring issuance of an “Alternate” for public review and comment prior to Commission vote when a substantive change is made to a PD).

¹⁰ See *So. Cal. Edison*, 140 Cal. App. 4th at 1107 (issue must be in the scope of issues in a scoping memo for a decision to be procedurally valid).

¹¹ See D.06-05-043 at p.13 (May 25, 2006) (“revisions to a PD that constitute more than a mere editorial change and result in a substantive change that affects the outcome of the proposed decision constitute an alternate decision”); see also Public Utilities Code § 311(e).

was no opportunity for parties to identify the apparent inconsistency between the discussion in the body of the RAM Decision and the conclusions of law. Silverado believes this omission can be easily corrected by inserting an appropriate conclusion of law exempting QFs from the prohibition on bilateral contracting into the RAM Decision.

If a prohibition on QF bilateral contracting is intentional, Silverado believes such a prohibition is preempted by federal law. PURPA governs sales and purchases between QFs and electric utilities.¹² Federal Energy Regulatory Commission (“FERC”) regulations implementing PURPA grant QFs and electric utilities the ability to negotiate rates and terms of QF purchases.¹³ To the extent the RAM Decision intends to bar utilities from entering into bilateral contracts with QFs, such action would be inconsistent with the intent of PURPA to encourage renewable generation and would be preempted by FERC’s PURPA regulations.¹⁴ Commission precedent clearly recognizes that FERC regulations provide QFs an option of bilateral contracting.¹⁵ Thus, to the extent the RAM Decision subverts rights currently enjoyed by QFs regarding the ability to bilaterally negotiate contracts with utilities outside of the RAM, such action is preempted by federal law.

¹² See 18 C.F.R. § 292.301(a).

¹³ 18 C.F.R. § 292.301(b) provides that “nothing in this subpart. . . limits the authority of any electric utility or any qualifying facility to agree to a rate for purchase, or terms or conditions relating to any purchase, which differ from the rate or terms or conditions which would otherwise be required by this subpart.”

¹⁴ See *Fidelity Savings & Loan Assoc. v. De La Cuesta*, 458 U.S. 141, 153 (1982) (state law preempted when in conflict with federal regulations).

¹⁵ See Order Instituting Rulemaking No.2, 1980 Cal. PUC Lexis 1300,*26 (CPUC Sept. 3 1980) (“it is obvious from the FERC’s Section 210 rules that the [CPUC] is only to implement standards that provide rights and protections which will “buttress” a [QF]’s ability to negotiate with an electric utility.”).

III. Conclusion

For the reasons stated herein, the Commission should grant rehearing of D.10-12-048 and insert a conclusion of law into the RAM Decision stating: “Nothing in this RAM Decision should apply to contracts with facilities that qualify as small power producers pursuant to PURPA and 18 CFR 292.201 et. seq. The IOUs are permitted to continue bilateral negotiation with QFs under 20 MW.”¹⁶

Respectfully submitted this February 2, 2011.

/s/ Kevin T. Fox

KEVIN T. FOX
Keyes & Fox LLP
436 14th Street, Suite 1305
Oakland, CA 94612
Telephone: (510) 314-8201
Facsimile: (510) 225-3848
E-mail: kfox@keyesandfox.com

¹⁶ See NextEra Application, Exhibit A.

Verifications

I am the attorney for Silverado Power LLC (Silverado); Silverado is absent from the County of Alameda, California where I have my office, and I make this verification for Silverado for that reason; the statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

Dated at Oakland, CA, this 2nd day of February, 2011.

/s/ Kevin T. Fox
Kevin T. Fox
Attorney for Silverado Power LLC

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing “Response of Silverado Power LLC to Application for Rehearing of Decision No. 10-12-048 Filed By NextEra Energy Resources” upon each person designated on the official service list compiled in this proceeding (R.08-08-009), via e-mail to all parties who have provided an e-mail address and via first class mail to those without e-mail service.

Dated at Oakland, CA, this 2nd day of February, 2011.

/s/ Thadeus B. Culley
Thadeus B. Culley

Sent Via U.S. Mail to:

President Michael R. Peevey,
California Public Utility Commission
505 Van Ness Ave.
San Francisco, CA 94102-3214

Anne E. Simon
California Public Utility Commission
Division of Administrative Law Judges
505 Van Ness Ave., Room 5107
San Francisco, CA 94102-3214

Burton Mattson
California Public Utility Commission
Division of Administrative Law Judges
505 Van Ness Ave., Room 5104
San Francisco, CA 94102-3214

KEVIN BOUDREAUX
MANAGER-RETAIL OPERATIONS
CALPINE POWERAMERICA CA, LLC
717 TEXAS AVENUE, SUITE 1000
HOUSTON, TX 77002

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

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

MICHAEL MEACHAM
ENVIRONMENTAL RESOURCE MANAGER
CITY OF CHULA VISTA
276 FOURTH AVENUE
CHULA VISTA, CA 91910

MOUNTAIN UTILITIES
PO BOX 1
KIRKWOOD, CA 95646

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

EMILIO E. VARANINI, III
GREENBERG TRAURIG, LLP
1201 K STREET, SUITE 1100
SACRAMENTO, CA 95814

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

SERVICE LIST R.08-08-009

Sent Via Electronic Mail to:

cadowney@cadowneylaw.com
chris.leveriza@glacialenergy.vi
ccasselman@pilotpowergroup.com
douglass@energyattorney.com
liddell@energyattorney.com
klatt@energyattorney.com
jnelson@psrec.coop
jleslie@luce.com
wplaxico@axiopower.com
AMSmith@SempraUtilities.com
jna@speakeasy.org
lwisland@ucsusa.org
Laurie.Mazer@bp.com
martinhomec@gmail.com
nrader@calwea.org
rhardy@hardyenergy.com
ted@fitcoalition.com
dgulino@ridgewoodpower.com
rresch@seia.org
keith.mccrea@sablaw.com
jim_p_white@transcanada.com
kb@enercalusa.com
jordan.white@pacificorp.com
dsaul@pacificsolar.net
GouletCA@email.laccd.edu
kelly.cauvel@build-laccd.org
eisenblh@email.laccd.edu
rkeen@manatt.com
npedersen@hanmor.com
mmazur@3PhasesRenewables.com
susan.munves@smgov.net
ej_wright@oxy.com
pssed@adelphia.net
cathy.karlstad@sce.com
mike.montoya@sce.com
rkmoore@scwater.com
kswitzer@gswater.com
cponds@ci.chula-vista.ca.us
mary@solutionsforutilities.com
DAKing@SempraGeneration.com
fortlieb@sandiego.gov
KHassan@SempraUtilities.com
GBass@SempraSolutions.com

TRoberts@SempraUtilities.com
CentralFiles@SempraUtilities.com
marcie.milner@shell.com
GloriaB@anzaelectric.org
kerry.eden@ci.corona.ca.us
phil@reesechambers.com
Joe.Langenberg@gmail.com
dorth@krcd.org
ek@a-klaw.com
bruce.foster@sce.com
cec@cpuc.ca.gov
nao@cpuc.ca.gov
jeanne.sole@sfgov.org
marcel@turn.org
matthew@turn.org
arno@recurrentenergy.com
ECL8@pge.com
nes@a-klaw.com
abrowning@votesolar.org
bcragg@goodinmacbride.com
jsqueri@gmsr.com
jarmstrong@goodinmacbride.com
mday@goodinmacbride.com
stevegreenwald@dwt.com
shong@goodinmacbride.com
todd.edmister@bingham.com
dhuard@manatt.com
jkarp@winston.com
edwardoneill@dwt.com
jeffgray@dwt.com
CRMd@pge.com
michael.hindus@pillsburylaw.com
ssmyers@att.net
gpetlin@3degreesinc.com
mrh2@pge.com
bill@fitcoalition.com
ralf1241a@cs.com
wbooth@booth-law.com
kowalewskia@calpine.com
info@calseia.org
rick_noger@praxair.com
jpross@sungevity.com
jody_london_consulting@earthlink.net

kfox@keyesandfox.com
gmorris@emf.net
ndesnoo@ci.berkeley.ca.us
clyde.murley@comcast.net
tomb@crossborderenergy.com
dweisz@marinenergyauthority.org
anders.glader@elpower.com
janreid@coastecon.com
michaelboyd@sbcglobal.net
johnredding@earthlink.net
jweil@aglet.org
jsanders@caiso.com
cmkehrein@ems-ca.com
dgeis@dolphingroup.org
dcarroll@downeybrand.com
davidb@cwo.com
jmcfarland@treasurer.ca.gov
jim.metropulos@sierraclub.org
blaising@braunlegal.com
sgp@eslawfirm.com
abb@eslawfirm.com
dkk@eslawfirm.com
lmh@eslawfirm.com
wwester@smud.org
Christine@consciousventuresgroup.com
kmills@cfbf.com
jcolive@bpa.gov
Tom.Elgie@powerex.com
renewablegroup@cpuc.ca.gov
freesa@thirdplanetwind.com
Andrew.Luszcz@glacialenergy.com
acitrin@prosoliana.com
WBlattner@SempraUtilities.com
davidmorse9@gmail.com
dtownley@infiniacorp.com
elvine@lbl.gov
HYao@SempraUtilities.com
jpepper@svpower.com
janice@strategenconsulting.com
kmills@cfbf.com
sahm@fitcoalition.com
kristin@consciousventuresgroup.com
lsherman@orrick.com
moxsen@calpine.com
matt.miller@recurrentenergy.com
mpf@stateside.com

stephaniec@greenlining.org
tam.hunt@gmail.com
tdarton@pilotpowergroup.com
ttutt@smud.org
todd.johansen@recurrentenergy.com
regulatory@silveradopower.com
legal@silveradopower.com
mrw@mrwassoc.com
artrivera@comcast.net
CKebler@SempraGeneration.com
cynthia.brady@constellation.com
cynthia.brady@constellation.com
Derek@AltaPowerGroup.com
EGrizard@deweysquare.com
pstoner@lgc.org
imcgowan@3degreesinc.com
Jennifer.Barnes@Navigantconsulting.com
James.Stack@CityofPaloAlto.org
judypau@dwt.com
lmitchell@hanmor.com
m.stout@meridianenergyusa.com
mniroula@water.ca.gov
pblood@columbiaenergypartners.com
pshaw@suntechamerica.com
richard.chandler@bp.com
r.raushenbush@comcast.net
pletkarj@bv.com
SEHC@pge.com
shess@edisonmission.com
thomase.hobson@ge.com
TCorr@SempraGlobal.com
mpr-ca@coolearthsolar.com
Harry.Singh@RBSSempra.com
Karen.Kochonies@MorganStanley.com
Morgan.Hansen@MorganStanley.com
nicole.fabri@clearenergybrokerage.com
ron.cerniglia@directenergy.com
vsuravarapu@cera.com
tjaffe@energybusinessconsultants.com
garson_knapp@fpl.com
cswoollums@midamerican.com
abiecunasjp@bv.com
nblack@calbioenergy.com
tcarlson@rrienergy.com
echiang@elementmarkets.com
jpittsjr@pcgconsultants.com

jon.jacobs@paconsulting.com
kjsimonsen@ems-ca.com
ccollins@Energystrat.com
jenine.schenk@apses.com
emello@sppc.com
tdillard@sppc.com
jgreco@terra-genpower.com
Jeff.Newman@bth.ca.gov
ctorchia@chadbourne.com
fyanney@fulbright.com
igoodman@commerceenergy.com
Douglas@Idealab.com
vjw3@pge.com
fhall@solarelectricsolutions.com
jackmack@suesec.com
case.admin@sce.com
george.wiltsee@sce.com
Joni.Templeton@sce.com
Laura.Genao@sce.com
kswitzer@gswater.com
chad@cenergypower.com
rjgilleskie@san.rr.com
Jcox@fce.com
ggisel@indenergysolutions.com
SNelson@Sempra.com
farrellytc@earthlink.net
HRasool@SempraUtilities.com
DNiehaus@SempraUtilities.com
CentralFiles@SempraUtilities.com
peter.pearson@bves.com
csteen@bakerlaw.com
rblee@bakerlaw.com
chestonem@sharpsec.com
john@deweygroup.com
lechnitz@lumospower.com
michaelgilmore@inlandenergy.com
hanigan@encous.com
pfmoritzburke@gmail.com
janet.gagnon@solarworldusa.com
Jeff.Hirsch@DOE2.com
hal@rwitz.net
sue.mara@rtoadvisors.com
mdjoseph@adamsbroadwell.com
paulfenn@local.org
rudy.reyes@verizon.com
Dan.adler@calcef.org

mramirez@sfwater.org
srovetti@sfwater.org
tburke@sfwater.org
norman.furuta@navy.mil
andre.devilbiss@recurrentenergy.com
dcover@esassoc.com
reg@silveradopower.com
jim.howell@recurrentenergy.com
luke.dunnington@recurrentenergy.com
sam.maslin@recurrentenergy.com
snuller@ethree.com
mcarboy@signalhill.com
avege@firstwind.com
RegRelCPUCCases@pge.com
ELL5@pge.com
MGML@pge.com
jay2@pge.com
jsp5@pge.com
filings@a-klaw.com
ldri@pge.com
MMCL@pge.com
mginsburg@orrick.com
spauker@wsgr.com
tjl@a-klaw.com
cmmw@pge.com
nxk2@pge.com
Eriks@ecoplexus.com
amartin@nextlight.com
fderosa@nextlight.com
jstoddard@manatt.com
jwoodruff@nextlight.com
jscancarelli@crowell.com
mchediak@bloomberg.net
rafi.hassan@sig.com
sdhilton@stoel.com
tkaushik@manatt.com
vidhyaprabhakaran@dwt.com
tsolomon@winston.com
bobgex@dwt.com
Diane.Fellman@nrgenergy.com
cem@newsdata.com
sho@ogrady.us
atk4@pge.com
CPUCCases@pge.com
BXSZ@pge.com
GXL2@pge.com

S2B9@pge.com
rwaltherr@pacbell.net
ryan.heidari@endimensions.com
wetstone@alamedamp.com
beth@beth411.com
kerry.hattevik@nrgenergy.com
andy.vanhorn@vhcenergy.com
sean.beatty@mirant.com
barmackm@calpine.com
JChamberlin@LSPower.com
phanschenn@mofo.com
timea.Zentai@navigantconsulting.com
masont@bv.com
dietrichlaw2@earthlink.net
alex.kang@itron.com
ramonag@ebmud.com
bepstein@fablaw.com
ken.alex@doj.ca.gov
nellie.tong@us.kema.com
cpucdockets@keyesandfox.com
cwooten@lumenxconsulting.com
rschmidt@bartlewells.com
gteigen@rcmdigesters.com
mcmahon@solar Millennium.com
sgallagher@stirlingenergy.com
gtrobinson@lbl.gov
ed.smeloff@sunpowercorp.com
erasmussen@marinenergyauthority.org
sara@solaralliance.org
juliettea7@aol.com
lynn@lmaconsulting.com
tfaust@redwoodrenewables.com
tim@marinemt.org
johnspilman@netzero.net
ed.mainland@sierraclub.org
keithwhite@earthlink.net
wem@igc.org
eric.cherniss@gmail.com
shani@scvas.org
renee@gem-corp.com
tom_victorine@sjwater.com
jrobertpayne@gmail.com
davido@mid.org
joyw@mid.org
brbarkovich@earthlink.net
dgrandy@caonsitegen.com

rmccann@umich.edu
tobinjmr@sbcglobal.net
saeed.farrokhpay@ferc.gov
e-recipient@caiso.com
dennis@ddecuir.com
rick@sierraecos.com
david.oliver@navigantconsulting.com
kenneth.swain@navigantconsulting.com
cpucrulings@navigantconsulting.com
lpark@navigantconsulting.com
pmaxwell@navigantconsulting.com
tpomales@arb.ca.gov
amber@iepa.com
tbrunello@calstrat.com
mclaughlin@braunlegal.com
danielle@ceert.org
jluckhardt@downeybrand.com
bernardo@braunlegal.com
steveb@cwo.com
steven@iepa.com
Tiffany.Roberts@lao.ca.gov
dseperas@calpine.com
bsb@eslawfirm.com
cte@eslawfirm.com
jgg@eslawfirm.com
rroth@smud.org
mdeange@smud.org
vwood@smud.org
lterry@water.ca.gov
hurlock@water.ca.gov
karen@klindh.com
atrowbridge@daycartermurphy.com
dsanchez@daycartermurphy.com
DocToxics@aol.com
dbranchcomb@spi-ind.com
c.mentzel@cleanenergymaui.com
sas@a-klaw.com
mpa@a-klaw.com
californiadockets@pacificorp.com
Tashiana.Wangler@PacifiCorp.com
dws@r-c-s-inc.com
castille@landsenergy.com
john_dunn@transcanada.com
meredith_lamey@transcanada.com
mark.thompson@powerex.com
olga.beznosova@bctc.com

AEG@cpuc.ca.gov
CNL@cpuc.ca.gov
DBP@cpuc.ca.gov
MWT@cpuc.ca.gov
SMK@cpuc.ca.gov
TRH@cpuc.ca.gov
cleni@energy.state.ca.us
lgonzale@energy.state.ca.us
jmcmahon@8760energy.com
abl@cpuc.ca.gov
as2@cpuc.ca.gov
ams@cpuc.ca.gov
aes@cpuc.ca.gov
bwm@cpuc.ca.gov
cjm@cpuc.ca.gov
clu@cpuc.ca.gov
ctd@cpuc.ca.gov
ciw@cpuc.ca.gov
dot@cpuc.ca.gov
gtd@cpuc.ca.gov
jm3@cpuc.ca.gov
jzr@cpuc.ca.gov
jp6@cpuc.ca.gov
jaa@cpuc.ca.gov
jf2@cpuc.ca.gov
jmh@cpuc.ca.gov
kar@cpuc.ca.gov
kho@cpuc.ca.gov
kwh@cpuc.ca.gov
lau@cpuc.ca.gov

mpo@cpuc.ca.gov
mrl@cpuc.ca.gov
mjs@cpuc.ca.gov
mjd@cpuc.ca.gov
mc3@cpuc.ca.gov
sha@cpuc.ca.gov
nlr@cpuc.ca.gov
nil@cpuc.ca.gov
psd@cpuc.ca.gov
rmm@cpuc.ca.gov
rkn@cpuc.ca.gov
svn@cpuc.ca.gov
sc1@cpuc.ca.gov
tbo@cpuc.ca.gov
ys2@cpuc.ca.gov
Will.Brieger@doj.ca.gov
claufenb@energy.state.ca.us
cleni@energy.state.ca.us
hrait@energy.state.ca.us
kzocchet@energy.state.ca.us
mpryor@energy.state.ca.us
pdoughma@energy.state.ca.us
dvidaver@energy.state.ca.us
jwoodwar@energy.state.ca.us
pbarthol@energy.state.ca.us
hcronin@water.ca.gov
rmiller@energy.state.ca.us
cadowney@cadowneylaw.com
chris.leveriza@glacialenergy.vi