

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

06-12-09  
04:59 PM

Application of Lodi Gas Storage, LLC to Modify  
Decision 00-05-048 (U-912-G)

Application 09-06-\_\_\_

(Filed June 12, 2009)

A0906011

APPLICATION OF LODI GAS STORAGE, LLC  
TO MODIFY DECISION 00-05-048

James W. McTarnaghan  
**DUANE MORRIS LLP**  
One Market, Spear Tower Suite 2000  
San Francisco, CA 94105-1104  
Telephone: (415) 957-3088  
Facsimile: (415) 358-5539  
Email: [jwmctarnaghan@duanemorris.com](mailto:jwmctarnaghan@duanemorris.com)

**Attorneys for Lodi Gas Storage, LLC**

Date: June 12, 2009

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of Lodi Gas Storage, LLC to Modify  
Decision 00-05-048 (U-912-G)

Application 09-06-\_\_\_\_

(Filed June 12, 2009)

**APPLICATION OF LODI GAS STORAGE, LLC  
TO MODIFY DECISION OO-05-048**

Pursuant to Rules 2.1 and 16.4 of the California Public Utilities Commission (“CPUC” or “Commission”) Rules of Practice and Procedure, Lodi Gas Storage, L.L.C. (“LGS”) hereby applies to the CPUC for modification of D.00-05-048, as modified by D.04-05-034.<sup>1</sup>

Specifically, LGS requests that the Commission modify the current requirement to provide a surety or performance bond to cover the costs of meeting its obligations under the Certificate of Public Convenience and Necessity (“CPCN”) by allowing a parental guaranty in the same amount and for the same purposes as the existing bond from a creditworthy parent company, such as LGS’ current parent, Buckeye Partners, L.P. (“Buckeye Partners”). As detailed in this Application, such modifications are warranted based on the changed circumstances associated with the transfer of control approved in D.08-01-018 and the highly successful operation of the LGS natural gas storage facility in Lodi, California (the "Lodi Facility").

---

<sup>1</sup> LGS originally submitted and served this document captioned as a Petition for Modification of D.00-05-048. Per direction of the CPUC Docket Office and Administrative Law Judge Jacqueline Reed, LGS has re-filed its request for modification as an Application given that A.98-11-012 is a closed proceeding. LGS here meets all requirements of a Petition for Modification and, as directed, has included scoping memo and a verification pursuant to Rule 1.11. LGS has served this Application on all parties listed on the service list for A.98-11-012 and has updated the addresses to the extent possible.

## **I. APPLICATION FOR MODIFICATION**

In this Application for Modification, LGS requests modifications of D.00-05-048 as modified by D.04-05-034.<sup>2</sup> As set forth here, as a result of the transfer of control of LGS to Buckeye Partners in D.08-01-018, LGS is for the first time owned by a publicly-traded, creditworthy entity willing and able to issue and stand behind a parental guaranty. Based on this change, LGS requests that the current obligation to provide a surety or performance bond be modified such that Buckeye Partners, as the creditworthy parent of LGS, would be permitted to substitute a parental guaranty in the same amount and for the same purposes as the existing bond.<sup>3</sup>

In addition, in the event of a subsequent transfer of control, Buckeye Partners proposes that the Commission play an active role in determining whether a parental guaranty should continue or a bond requirement re-imposed. If the Commission finds that the new owner has similar financial stability and creditworthiness to Buckeye Partners, such new owner should be permitted to choose between a bond and a parental guaranty. In the event, however, that the Commission finds that the new owner does not have similar financial stability and creditworthiness to Buckeye Partners or is unwilling or unable to issue a parental guaranty, such new owner would remain obligated to provide a surety or performance bond.

---

<sup>2</sup> D.00-05-048 originally required a \$20 million surety or performance bill. In response to an earlier Petition for Modification, the Commission, in D.04-05-034, reduced the amount of the bond to \$10 million, adjusted annually from the May 18, 2000 issuance date of D.00-05-048, but otherwise did not eliminate the need for the bond.

<sup>3</sup> This Application does not propose any changes in the current obligation to maintain a general liability insurance policy of \$1 million, as well as umbrella insurance policy of \$50 million per occurrence as required in D.00-05-048.

As explained further below, there is ample justification for the requested modifications to these decisions and a reasonable explanation as to why such modifications are being requested more than one year since the effective date of the decisions proposed to be modified.

**A. Procedural Background**

LGS was originally granted a Certificate of Public Convenience and Necessity in D.00-05-048 to construct and operate the Lodi Facility. During the course of the original proceeding, concerns were raised by individual landowners and the San Joaquin Farm Bureau Federation (the “Farm Bureau”) about the new company’s ability to meet its obligations under the CPCN. LGS was originally owned by Western Hub Properties, LLC (“WHP”), a development company with limited assets.

In response to those concerns, D.00-05-048 imposed a requirement that LGS obtain a surety bond in the amount of \$20,000,000. The bond’s original intent was to “cover the costs of meeting its obligations under this CPCN.” D.00-05-048, *mimeo*, p. 34. The Commission further indicated that “[t]hese costs include, but are not limited to, reburial of the pipeline in the event of subsidence of the soil covering the pipeline, costs of restoring the area in the event of abandonment or bankruptcy, etc.” *Id.*

Subsequently, in July 2003, LGS filed a Petition for Modification to eliminate the bond requirement which was opposed by the Farm Bureau and individual landowners. In D.04-05-034, issued May 27, 2004, the Commission granted the Petition for Modification insofar as it reduced the bond from \$20 million to \$10 million, adjusted annually for inflation, but did not find that circumstances at that time justified the elimination of the bond requirement. Significantly, WHP continued to own LGS in 2004 when D.04-05-034 was issued.

LGS has now maintained the bond for almost a decade at substantial expense. The bond has never been used for any purpose. During all times since the CPCN was granted, LGS has

had an exemplary operational and safety record and has established excellent relationships with its neighbors and the overall community. In addition, while ownership and control of LGS has changed since the 2000 grant of the CPCN, LGS consistently maintained its operational and safety records and its relationships with the community.<sup>4</sup>

In July 2007, LGS filed A.07-07-025 requesting authority to transfer indirect control of LGS to Buckeye Gas Storage LLC ("Buckeye Gas Storage"). Such authority was granted in D.08-01-018, issued January 11, 2008. Buckeye Gas Storage is a wholly-owned subsidiary of Buckeye Partners, a publicly-traded entity on the New York Stock Exchange. Through this Application, LGS now seeks to modify D.00-05-048 to reflect the ability of Buckeye Partners to provide a parental guaranty so long as Buckeye Partners continues to control LGS and to provide continued protection by either a bond or a parental guaranty in the event that control of LGS is transferred to another entity.<sup>5</sup>

**B. Explanation of why this Application is filed more than one year following the effective date of the decisions proposed to be modified**

Rule 16.4(d) requires that a Petition for Modification must generally be filed and served within one year of the effective date of the decision proposed to be modified but, in instances where more than one year has elapsed, allows the petitioner to explain why the petition could not have been presented within one year of the effective date of the decision. D.00-05-048 was

---

<sup>4</sup> In D.03-02-071 and D.05-12-007, the Commission approved two separate transactions leading to transfer of 100 percent of WHP's ownership in LGS to WHP Acquisition Company, L.L.C. and WHP Acquisition II, L.L.C. which, in turn were owned by ArcLight Energy Partners Fund I and Fund II (the "ArcLight Funds"). In these decisions, the issue of the bond requirement was not pursued. Most recently, control of LGS was transferred to Buckeye Gas Storage in D.08-01-018.

<sup>5</sup> To be clear, Buckeye Partners has no plans to transfer control of LGS to any other entity and includes this additional protection solely to address concerns raised in informal discussions with the Farm Bureau prior to the filing of this Application concerning hypothetical scenarios in which such transfer could occur in the future. To the contrary, Buckeye Partners views LGS as a long-term asset.

issued on May 22, 2000, and was modified by D.04-05-034 on May 28, 2004, clearly more than one year ago. As explained here, there is good cause for the filing of this Application beyond one year after the issuance of the decisions.

The fundamental justification for the modifications relates to the transfer of control of LGS to Buckeye Partners. As noted above, such transfer of control and ownership of LGS was authorized in D.08-01-018 issued in January 2008, and the operational transfer has been seamless.<sup>6</sup> After obtaining authorization and concentrating on the immediate concerns with acquiring and expanding a new business, the new owners of LGS have evaluated the regulatory requirements imposed on them and identified the bond requirement as no longer necessary given the financial and operational stability of LGS and the financial stability and creditworthiness of Buckeye Partners and its willingness to issue a parental guaranty in lieu of the bond. Given that the transfer of control which merits the grant of this Application did not occur until after issuance of D.08-01-018 and that such transfer justifies the modifications requested, LGS could not have filed this Application on these grounds within one year after either of the earlier decisions.

### **C. Justification for Requested Modifications**

LGS seeks to eliminate the prior requirements to maintain a surety bond as the changed financial and operational circumstances of LGS and its parent company no longer warrant the unnecessary expense of the bond. In doing so, LGS here demonstrates that the original justification for the bonds no longer remains given the stability of the new owner, the commitment to provide protection similar to the current required bond with a parental guaranty, and the commendable operations to date at the Lodi Facility. Indeed, LGS believes that the

---

<sup>6</sup> In an effort to facilitate approval of the transfer of control to Buckeye Gas Storage, the Joint Applicants in A.07-07-025 did not propose modification of the bond requirement in that proceeding. Nothing in D.08-01-018 or any other decision precludes LGS from seeking the relief requested herein.

changed circumstances presented here both in terms of LGS' successful operations for close to a decade and the financial stability of LGS and its parent company could readily support the complete elimination of the bond requirement *without the parental guaranty*.<sup>7</sup>

**1. The Transfer of Ownership of LGS to Buckeye Partners in D.08-01-018 Significantly Changes the Circumstances Originally Justifying the Bond**

In evaluating Petitions for Modification, the Commission looks to the changed facts and circumstances and evaluates the requested modifications in light of existing facts. In this situation, the current circumstances are radically different from those considered in the late 1990s when the original application for a CPCN was processed and in 2003 when the first Petition for Modification was filed by LGS on the bond. For example, in 2000, the Commission was dealing with an application from a start-up company with little resources and no operational track record entering into the then-nascent business of gas storage. WHP's function and purpose was largely to develop natural gas facilities such as LGS. WHP did not have significant resources of its own and was not backed by a corporate parent willing and able to provide financial backing in the event that LGS did not work out as planned, experienced subsidence issues in the Delta or was abandoned.

Similarly, in 2004, when the Commission reduced the bond amount, LGS was still owned by WHP and had only a couple of years' experience of operations. At that point, LGS requested that the bond obligation be completely removed and did not offer a parental guaranty as a

---

<sup>7</sup> In anticipation of seeking a modification to the bond requirement, LGS met with representatives of the Farm Bureau on several occasions to garner support for and/or minimize opposition to this Application. During those meetings, LGS carefully listened to concerns raised by the Farm Bureau and proposed both the parental guaranty and a specific process intended to assure a level of protection comparable to that provided by the bond in a situation where a future owner is not able or willing to provide a parental guaranty. While the Farm Bureau may prefer no change from the status quo, to do so ignores the significant changed circumstances and the unnecessary regulatory burden carried by LGS.

substitute for the bond. In the original application and the original petition for modification, LGS was unable to point to a financially stable parent company willing and able to provide support for obligations covered by the bond and, as such, a proposal to use a parental guaranty has never before been presented to the Commission.

At this time, however, the financial circumstances which arguably justified the original bond requirement have substantially changed. In D.08-01-018, the Commission approved the transfer of a 100% interest in LGS to Buckeye Gas Storage, which in turn is 100% owned by Buckeye Partners, a publicly-traded entity with substantial assets and a solid, investment-grade credit rating. Excerpts containing recent financial information from the Form 10-K (Year-End 2008 audited reports) and the Form 10-Q (1<sup>st</sup> Quarter, 2009 unaudited reports) submitted to the United States Securities and Exchange Commission are attached hereto as Attachment A.

Unlike the prior owners of LGS, Buckeye Partners is willing and able, as detailed below, to issue a parental guaranty in the same amount and for the same purposes as the existing bond.

**2. Similar Protection to that Provided by the Bond Can Be Obtained by a Parental Guaranty from Buckeye Partners**

Buckeye Partners is the financially stable parent of Buckeye Gas Storage which, in turn, owns all interests in LGS. Buckeye Partners stands ready, willing and able to meet LGS' obligations imposed by the Commission with or without a parental guaranty. As such, under Buckeye Partners' ownership, a costly bond could be replaced with a parental guaranty without reducing *any* protection now covered by the bond requirement. Parental guaranties are commonly used commitments to backstop companies and have been accepted by other California state agencies as adequate protections without imposing unnecessary costs to obtain bonds.<sup>8</sup> A

---

<sup>8</sup> For example, Buckeye Partners has issued a parental guaranty to the California State Lands Commission for obligations associated with LGS leases.

copy of a *pro forma* Parental Guaranty which Buckeye Partners will execute if this Application is granted is attached hereto as Attachment B to this Application. Attachment C to this Application is an affidavit of William H. Schmidt, Jr., Vice President, General Counsel and Secretary of Buckeye Partners' general partner, formally representing Buckeye Partners' willingness and ability to execute a parental guaranty.

**3. Experience has Disproved the Subsidence, Safety and Abandonment Issues Raised By Proponents of the Bond**

In the original CPCN proceeding in which the bond was required, the Farm Bureau and interested parties argued that a bond was necessary given the unproven track record of the facility located within the agricultural area in and around Lodi, California. Among the concerns raised were fears that the soil covering the pipelines used by Lodi would subside and that, if the project was not successful, the facility would be abandoned. These types of concerns can readily be addressed by a parental guaranty issued by a creditworthy parent in lieu of the existing bond requirement.

Moreover, the LGS facility now has nearly a decade of operating experience. During that time, there has not been a single incident of subsidence. LGS has become an integral part of the Lodi community and has proven its willingness and ability to act as a responsible corporate citizen and neighbor. LGS' economic value has increased dramatically with years of safe and successful operations eliminating risk of abandonment of the facility.

**4. In a Future Transfer of Control, a Bond or Parental Guaranty As Appropriate**

Buckeye Partners is the first owner of LGS that has an investment-grade credit rating and is willing to issue a parental guaranty. Buckeye Partners has no current plans to transfer control of LGS to any other entity but understands that the Commission, the Farm Bureau and other

interested parties may be concerned about the potential for such a transfer and the impact on those now protected by the bond requirement.

To address these concerns, LGS has proposed modifications to D.00-05-048 below which, with the Commission's approval, address the bond question at the time any future transfer of control is proposed. As part of the Application for approval of such transfer, the new entity would need to demonstrate that it is of similar financial stability and creditworthiness to replace the parental guaranty by Buckeye Partners with its own. If this showing satisfied the Commission of the new entity's financial stability and creditworthiness, the Commission would then allow such entity to decide whether it would provide such protection using a surety or performance bond or through a parental guaranty similar to that set forth in Attachment B hereto. If, however, the Commission found in a decision otherwise approving a transfer of control to a new owner that the new owner does not have similar creditworthiness as Buckeye Partners, the Commission could then require that the new owner meet its obligations by the issuance of a bond. While this determination could be made by the Commission as part of the processing of an uncontested application, the Farm Bureau or any other interested party would be free, as always, to advocate that the new owner should be required to acquire a bond.

## **II. SPECIFIC MODIFICATIONS PROPOSED**

LGS respectfully requests that Commission make the following changes in D. 00-05-048, as modified by D.04-05-034:

1. Modify the text in Section 6, page 35, by adding a footnote to the end of the sentence which now, as modified by D.04-05-034 reads: "Furthermore, LGS is also required to provide a surety or performance bond in the amount of \$10 million, adjusted annually for inflation from the date of issuance of Decision 00-05-048, May 18, 2000, to cover the costs of meeting its obligations under the CPCN." The new footnote should read:

If, in the future, LGS is controlled by a creditworthy entity with substantial assets, this obligation can be met in the form of a parental guaranty for the same amount and for the same purpose for so long as such entity retains control of LGS. Thereafter, if a subsequent transfer of control of LGS occurs, we shall consider in the decision on such transfer whether the new owner of LGS is sufficiently financially stable and creditworthy to use a parental guaranty in lieu of a bond. If so, such new owner shall be required to provide either a bond or a parental guaranty in the appropriate amount and for the same purpose as required here. If not, such entity shall be required to meet this obligation by providing a surety or performance bond in the amount of \$10 million adjusted annually for inflation from May 18, 2000, the issuance date of Decision 00-05-048.

2. Modify Conclusion of Law 7 of D.00-05-048, as modified by D.04-05-034, by

adding the following language at the end of the paragraph:

If, in the future, LGS is controlled by a creditworthy entity with substantial assets, this condition can be met in the form of a parental guaranty for the same amount and for the same purpose for so long as such entity retains control of LGS. If a subsequent transfer of control of LGS occurs to another financially stable and creditworthy entity, the new owner shall be required to provide either a bond or a parental guaranty in the appropriate amount and for the same purpose as required here. If the new owner is not sufficiently financially stable and creditworthy, such entity shall be required to meet this condition by providing a surety or performance bond in the amount of \$10 million adjusted annually for inflation from May 18, 2000, the issuance date of Decision 00-05-048.

3. Modify Ordering Paragraph 5 of D.00-05-048, as modified by D.04-05-034, by

adding the following language at the end of the paragraph:

If, in the future, LGS is controlled by a creditworthy entity with substantial assets, this condition can be met in the form of a parental guaranty for the same amount and for the same purpose for so long as such entity retains control of LGS. If a subsequent transfer of control of LGS occurs to another financially stable and creditworthy entity, the new owner shall be required to provide either a bond or a parental guaranty in the appropriate amount and for the same purpose as required here. If the new owner is not sufficiently financially stable and creditworthy, such entity shall be required to meet this condition by providing a surety or

performance bond in the amount of \$10 million adjusted annually for inflation from May 18, 2000, the issuance date of Decision 00-05-048.

### **III. INFORMATION REQUIRED BY ARTICLES 2 AND 7**

#### **A. Exact Legal Name of Applicant:**

The exact legal name of the Applicant is Lodi Gas Storage, LLC. LGS is a limited liability company organized under the laws of Delaware, qualified to do business in California by the Secretary of State. LGS' corporate office is located at One Greenway Plaza, Sixth Floor, Suite 600, Houston, Texas 77046

#### **B. Communications:**

All communications regarding this Application should be addressed to:

James W. McTarnaghan  
Duane Morris LLP  
One Market, Spear Tower Suite 2000  
San Francisco, CA 94105-1104  
Telephone: 415-957-3088  
Facsimile: 415-358-5539  
E-Mail: [jwmctarnaghan@duanemorris.com](mailto:jwmctarnaghan@duanemorris.com)

#### **C. Qualifications to Transact Business in California:**

LGS is qualified to do business in California has previously submitted documentation in compliance with Rule 2.2 in Application 07-07-025.

#### **D. Rule 2.1(c) Requirements**

Pursuant to Rule 2.1(c), LGS requests:

##### **1. Categorization:**

LGS recommends that this proceeding be categorized as a ratesetting proceeding.

**2. Need for Hearings:**

LGS does not believe that hearings are necessary in this proceeding. The information submitted in this Application is sufficient to permit the Commission to find that changed circumstances exist that justify the modifications requested herein.

**3. Issues to be Considered:**

The following issues needs to be addressed by the Commission:

- a. Whether the changed circumstances associated with the financial stability and creditworthiness of LGS' parent company, Buckeye Partners and the willingness of Buckeye Partners to issue a parental guaranty in lieu of the existing bond requirement justify the modifications requested by LGS;
- b. Whether the process proposed by LGS as a modification to D.00-05-048 in the event that control of LGS is transferred to another entity will provide continued assurance of performance by LGS.

**4. Proposed Schedule:**

Application Filed	June 12, 2009
Application Noticed	June 16, 2009
Responses/Protests to Application	July 16, 2009
Reply to Responses/Protests	July 27, 2009
Proposed Decision	August 2009
Commission Decision	October 5, 2009

**IV. CONCLUSION**

Regulators should avoid imposing regulatory costs on companies in competitive energy markets where such costs are unnecessary or unwarranted by the circumstances presented.

Given the changed circumstances set forth above, this Application provides the Commission with the opportunity to relieve LGS from the unnecessary regulatory costs associated with the

bond originally required in D.00-05-048 while more than adequately protecting the interests and concerns addressed by the original condition.

As shown here, there is no current justification to require a bond as the only way to provide a backstop to LGS to meet its obligations under the CPCN. LGS' new owner, Buckeye Partners, is a financially stable, publicly-traded company with a solid investment-grade credit rating and is ready, willing and able to provide a parental guaranty.

To the extent that control of LGS is transferred to another entity which is unable or unwilling to provide a parental guaranty, the specific modifications proposed above would provide an opportunity for a Commission ruling to reinstate the bond obligation, if necessary, as to that new entity in its decision approving the transfer of control.

Thus, LGS submits that good cause exists to grant this Application and to modify D.00-05-008 as set forth in this Application. In addition, LGS requests that the Commission make an explicit finding in its Decision on this Application for Modification that Buckeye Partners is permitted to replace the existing bond with a parental guaranty in the form attached hereto as Attachment B.

Respectfully submitted,

By: /s/ James W. McTarnaghan  
James W. McTarnaghan

**DUANE MORRIS LLP**  
One Market, Spear Tower Suite 2000  
San Francisco, CA 94105-1104  
Telephone: (415) 957-3088  
Email: [jwmctarnaghan@duanemorris.com](mailto:jwmctarnaghan@duanemorris.com)

Attorneys for Lodi Gas Storage, L.L.C.

Dated: June 12, 2009

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Application of Lodi Gas Storage, LLC to  
Modify Decision 00-05-048

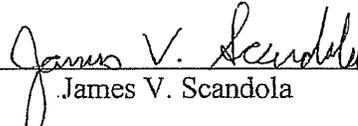
A.09-06-\_\_\_\_  
(Filed June 12, 2009)

VERIFICATION

I am an officer of the Applicant in the above-captioned matter and am authorized to make this Verification on its behalf. The statements in the foregoing instrument are true on my own knowledge, except as to matters which are stated therein on information or believe, and as to those matters, I believe them to be true.

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

Executed on June 12, 2009, at Breinigsville, Pennsylvania.

  
James V. Scandola

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing, “**Application of Lodi Gas Storage, LLC to Modify D.00-05-048**” by using the following service:

**E-mail service:**

**U.S. Mail service:** mailing by first-class mail with postage prepaid to all known parties of record in A.98-11-012 who did not provide electronic mail addresses.

**Hand Delivery service:** delivering by messenger and/or courier to:

Executed this 12th day of June 2009, at San Francisco, California.

/s/ Barbara A. Murphy  
Barbara A. Murphy

DM2\1956081.1

**SERVICE LIST: A.98-11-012**

Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Suite 1000  
South San Francisco, CA 94080-7037

Dan L. Carroll  
Downey Brand LLP  
621 Capitol Mall, 18th Floor  
Sacramento, CA 95814-4686

California Public Utilities Commission  
Legal Division  
505 Van Ness Avenue  
San Francisco, CA 94102

Garry Hubert  
Hubert & Yasutake  
1320 Willow Pass Road, Suite 590  
Concord, CA 94520

Joe Peterson  
Peterson Vineyards  
25030 North Bruella  
Acampo, CA 95220

Robert Gex  
Davis Wright Tremaine LLP  
505 Montgomery Street, #800  
San Francisco, CA 94111-6533

David Bergquest  
Kevin Bourdreau  
Western Hub Properties, LLC  
14811 St. Mary's Lane, Suite 150  
Houston, TX 77079

Mike and Tammy Blakely  
7250 East Jahanti Road  
Acampo, CA 95220-9629

Edward W. O'Neill  
Davis Wright Tremaine LLP  
505 Montgomery Street, #800  
San Francisco, CA 94111-6533

Miguel C. and Joetta Estrada  
9422 East Jaliant Road  
Acampo, CA 95220

Karna Harrigfeld  
D. Stephen Schwabauer  
Herum Crabtree Brown  
2291 W. March Lane, Ste B100  
Stockton, CA 95207-6667

John Zonino  
John Zonino Farms  
4240 East Acampo Road  
Acampo, CA 95220

Andrew Mastin  
Pillsbury Winthrop LLP  
50 Fremont Street  
San Francisco, CA 94105-2228

Michael Florio  
The Utility Reform Network  
711 Van Ness Avenue, Suite 350  
San Francisco, CA 94102

Valuation Division  
Board of Equalization  
3321 Power Inn Rd., Suite 210  
Sacramento, CA 95826-3889

Ronald Liebert  
California Farm Bureau Federation  
2300 River Plaza Drive  
Sacramento, CA 95883

Department of Water Resources  
Division of Land and Right of Way  
P.O. Box 942836  
Sacramento, CA 94236

Michael Day  
Goodin MacBride Squeri Day & Lamprey  
505 Sansome St., Suite 900  
San Francisco, CA 94111-3133

David W. Anderson  
Pacific Gas & Electric Co.  
Mail Code B30A  
P.O. Box 7442  
San Francisco, CA 94520

Glen Sullivan  
Sempra Energy  
101 Ash Street  
San Diego, CA 92101

Terri Dickerson  
Western Gas Resources California  
12200 N. Pecos Street  
Denver, CO 80234-3439

John Palmer  
Department of General Services  
County of Sacramento  
3284 Ramos Circle  
Sacramento, CA 95827

Chief Administrative Law Judge  
CPUC  
505 Van Ness Avenue  
San Francisco, CA 94102

CPUC – OGA  
770 “L” Street, Suite 1050  
Sacramento, CA 95814

Energy Division  
CPUC  
505 Van Ness Avenue  
San Francisco, CA 94102

Public Advisor’s Office  
CPUC  
505 Van Ness Avenue  
San Francisco, CA 94102

Chairman  
San Joaquin County Board of Supervisors  
Courthouse, Room 701  
222 East Weber Avenue  
Stockton, CA 95202

Anthony Pescetti  
c/o Junay Gardner Logan  
9845 Horn Road, Suite 150  
Sacramento, CA 95827

Anita Merlo  
165 West Cleveland Street  
Stockton, CA 95204

Larry Eng  
California Department of Fish and Game  
1416 9th Street  
Sacramento, CA 95814

Office of the Ratepayer Advocates  
CPUC  
505 Van Ness Avenue  
San Francisco, CA 94102

Peter Moritzburke  
Cambridge Energy Research Associates  
1999 Harrison St., Suite 950  
Oakland, CA 94612

Charles Gardiner  
Public Affairs Management  
135 Main Street, Suite 1600  
San Francisco, CA 94105-1843

Trustee, Reclamation District 2033  
Del Rio Partners  
10749 West Woodbridge Road  
Lodi, CA 95242

Dante J. Nomellini  
235 East Weber Avenue  
P.O. Box 1461  
Stockton, CA 95201

Ted Leventini, Jr.  
5375 E. Peltier Road  
Acampo, CA 95220

The Hon. Janet A. Econome  
Administrative Law Judge  
Executive Division  
CPUC  
320 West 4th St., Suite 500  
Los Angeles, CA 90013

Joe A. Cotta  
Cotta Properties, Inc.  
9414 Kost Road  
Galt, CA 95632

Harlan Glines  
Jones & Stokes  
2600 "V" Street  
Sacramento, CA 95818-1914

David L. Robertson  
Trainor Robertson  
701 University Avenue, Suite 200  
Sacramento, CA 95825

Julie Fitch  
Director – Energy Division  
CPUC  
505 Van Ness Avenue  
San Francisco, CA 94102

Donald G. Lenz  
Live Oak Investors Inc.  
11292 North Alpine Road  
Stockton, CA 95212