

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

01-29-10
04:59 PM

Order Instituting Rulemaking Regarding Policies and
Protocols for Demand Response Load Impact Estimates,
Cost-Effectiveness Methodologies, Megawatt Goals and
Alignment with California Independent System Operator
Market Design Protocols.

Rulemaking 07-01-041
(Filed January 25, 2007)

**REPLY BRIEF OF ENERNOC, INC., ENERGYCONNECT, INC.,
AND CPOWER, INC., ON JURISDICTIONAL ISSUES**

Sara Steck Myers
Attorney for **EnerNOC, Inc.**
122 - 28th Avenue
San Francisco, CA 94121
Telephone: 415-387-1904
Facsimile: 415-387-4708
Email: ssmyers@att.net

Melanie Gillette
Sr. Manager, Western Regulatory Affairs
EnerNOC, Inc.
115 Hazelmere Drive
Folsom, CA 93430
Telephone: 916-501-9573
Facsimile: 415-343-9575
Email: mgillette@enernoc.com

Rich Quattrini
VP of Marketing and Business Development
EnergyConnect, Inc.
901 Campisi Way, Suite 260
Campbell, CA 95008
Telephone: 408-340-7940
Facsimile: 866-858-0478
Email: rquattrini@energyconnectinc.com

Peter Maltbaek
Vice President Utility Sales & Portfolios
CPower, Inc.
1185 Elena Privada
Mountain View, CA 94040
Telephone: 917-796-2340
Facsimile: 212-361-6385
Email: peter.maltbaek@cpowered.com

January 29, 2010

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies and Protocols for Demand Response Load Impact Estimates, Cost-Effectiveness Methodologies, Megawatt Goals and Alignment with California Independent System Operator Market Design Protocols.

Rulemaking 07-01-041
(Filed January 25, 2007)

**REPLY BRIEF OF ENERNOC, INC., ENERGYCONNECT, INC.,
AND CPOWER, INC., ON JURISDICTIONAL ISSUES**

EnerNOC, Inc., EnergyConnect, Inc., and CPower, Inc. (“Joint Parties”) respectfully submit this Reply Brief on Jurisdiction Issues identified in the Assigned Commissioner and Administrative Law Judges’ (ALJs’) Ruling Amending Scoping Memo (Amended Scoping Memo) and the ALJ’s Ruling Memorializing Schedule Modifications in the Direct Participation Phase of this rulemaking issued on November 9 and December 29, 2009, respectively. This Opening Brief has been filed and timely served pursuant to these rulings and the Commission’s Rules of Practice and Procedure (Rules 1.10 and 13.11).

I.

**CLAIMS THAT DRPS ARE COMMISSION-JURISDICTIONAL
PUBLIC UTILITIES OR ESPS ARE WHOLLY UNSUPPORTED.**

Only 5 parties filed Opening Briefs addressing the issue of whether Demand Response Providers (DRPs) are subject to this Commission’s jurisdiction. Of those briefs, the two filed by the Joint Parties and the Alliance for Retail Energy Markets (AREM) provide strong and irrefutable support of a simple fact: According to the plain meaning of statutes defining “public utility” and “electric service provider” and using established principles of statutory construction, a DRP is neither a “public utility” nor an “electric service provider,” and the Legislature has never included DRPs within either definition nor shown any intent to do so.¹

With respect to the remaining three briefs filed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and the Division of Ratepayer Advocates (DRA), each makes various assertions about DRPs being either a “public utility” or “electric service provider.” These assertions, however, are made without any reliance on *relevant* Commission decisions and fail to apply established principles of statutory construction by

¹ Joint Parties Opening Brief, at pp. 5-17; AREM Opening Brief, at pp. 2-6.

ignoring the plain meaning of statutory language or failing to interpret statutes *in context* and with reference to all qualifying words used in the statute and its legislative history and timing.

PG&E's statement that the Commission "may" conclude that DRPs "will be public utilities subject to this Commission's jurisdiction" is unsupported.² In this regard, PG&E finally admits that, for the Commission to find that the DRP is a "public utility," it must find that it is an "electrical corporation," and for a DRP to be an "electrical corporation," it must own, control, operate, or manage "electric plant."³ PG&E claims that this determination is made "not on the specific property owned," but rather "on the purpose to which the property is put."⁴ PG&E further notes that, as to the dedication of such property to public use, such "dedication may be inferred."⁵

However, by virtue of the "plain meaning" of the statute *and* its construction by this Commission and the courts, the "electric plant" in question requires the ownership of physical plant "put" to *specific* uses – namely, for "the production, generation, transmission, delivery, or furnishing of electricity for light, heat, or power."⁶ Further, "dedication" of that property to public use is "not just to particular individuals or customers, but with a concomitant right by the public to demand such service."⁷ As the Joint Parties stated in their Opening Brief:

"No program currently administered by the Commission calls for demand response providers or aggregators to maintain or dedicate any such plant to public use to 'generate' or 'deliver' electricity. In fact, as noted above, the opposite is the case. The demand response provider works with the utility and utility customers to *reduce* the customer's energy usage."⁸

PG&E offers no analysis as to how a demand response service, which *reduces* electric consumption, in any way involves "plant" that "produces" or "delivers" "electricity" that is "used for light, heat or power," or what "plant" DRPs have "dedicated" to generating or delivering electricity to a customer. Similarly, DRA asserts that a DRP's ownership of equipment to "monitor" electric load is the same as "electric plant" within the meaning of PU Code Section 217. Again, this claim fails utterly since DRA never establishes that this equipment is being used to "produce" or "furnish" "electricity" to any DRP customer. DRA's

² PG&E Opening Brief, at p. 7.

³ PG&E Opening Brief, at p. 3.

⁴ PG&E Opening Brief, at p. 3.

⁵ PG&E Opening Brief, at p. 4.

⁶ PU Code §217.

⁷ Joint Parties Opening Brief, at pp. 10-11, n.31.

⁸ Joint Parties Opening Brief, at p. 11; emphasis added and original.

assertion that “utilities routinely characterize most hardware and even some software used with their demand response programs...as electric plant” is completely irrelevant since the entity making this ratemaking “characterization” is a public *utility* in the first place.⁹

In addition, DRA seeks to limit this Commission’s reliance on the Federal Energy Regulatory Commission’s (FERC’s) determination that demand response providers are not public utilities. However, as the Joint Parties establish in their Opening Brief, regardless of any action or determination made by FERC, under *California law*, DRPs are *not* public utilities. While the Joint Parties also referenced this determination by FERC, it was merely to indicate the conclusion reached by the energy regulatory body that has specific authority relative to the very changes being considered by the California Independent System Operator (CAISO) that gave rise to the question of Commission jurisdiction over DRPs in the first place.

The Joint Parties do appreciate that at least SCE has shown a better understanding of applicable law as to whether DRPs are “public utilities.” Specifically, SCE concludes: “The Commission does not appear to have jurisdiction over non-IOU DR service providers as public utilities, because they do not meet the statutory definition of public utilities.”¹⁰ In fact, as SCE further concedes, even in the case of electric service providers (ESPs) that actually do provide electricity to customers, they “are not public utilities” and “are not subject to the Commission’s general jurisdiction as are public utilities.”¹¹

However, SCE, along with DRA, wrongly conclude that DRPs can be considered ESPs for purposes of consumer protection regulation by the Commission. Both DRA and SCE mistakenly claim that the Legislature intended the definition of ESP to extend to DRPs by using words like “aggregator” to describe an ESP or entity that provides “direct access” service.¹² However, like the arguments made regarding “electrical corporations,” these claims fail again in the face of applicable principles of statutory construction.

First, the codes cited by both DRA and SCE apply only to a service that *provides electric service*, not one like demand response that *reduces electric consumption*. In fact, providing or delivering electricity to consumers is a condition precedent of all of the Commission decisions and legislation defining “electric service provider,” and the terms “aggregator” and “broker”

⁹ DRA Opening Brief, at p. 4.

¹⁰ SCE Opening Brief, at p. 4.

¹¹ SCE Opening Brief, at p. 4.

¹² DRA Opening Brief, at pp. 5, 8; SCE Opening Brief at p. 8.

used in that legislation are ancillary to and define an “electric service provider” and, as noted below, certainly require the sale or purchase of electricity in the first place. Further, to the extent that demand response is considered a “supply side resource,” as stated by DRA, it is because it displaces physical resources that would otherwise be required to supply electricity. Characterizing demand response as a supply resource does not transform DR into an entity generating or delivering electricity, the critical condition precedent to being an ESP or an “exempt wholesale generator” (EWG).¹³

Second, as the Joint Parties’ Opening Brief demonstrates in detail, at the time “electric service provider” was defined by the Legislature in the code, DRPs simply did not exist and, under those circumstances, could not have been and never were contemplated as being included in that definition by the Legislature. Of greater significance, all of these code sections – from the definition of ESP, to direct access service, and even to the definition of an electrical corporation – have been amended by the Legislature since demand response service programs were initiated in California and not once has the Legislature acted to define or add demand response services as being within the Commission’s jurisdictional reach.¹⁴ For the same reason, SCE’s reliance on D.97-02-021, which relates only to “*electric service provider*” and long predates the existence of DRPs, is equally misplaced.¹⁵

II. THE COMMISSION’S SOLE CONSUMER PROTECTION OVERSIGHT OF DRPS ARISES IN THE CONTEXT OF IOU DR PROGRAM DIRECTIVES OR RULES.

In its Opening Brief, the Joint Parties stated that any consumer protection deemed by this Commission or the CAISO to be required for DRPs beyond current law applicable to California businesses should be addressed through rules governing participation in jurisdictional utility programs. SCE’s Opening Brief seems to point in a similar direction in recommending that the DRP be required to “seek the approval of the CAISO, the LSE and the utility distribution company (UDC) before the DR resource can be bid into the CAISO’s DR products.”¹⁶

¹³ DRA Opening Brief, at p. 9. DRA at least acknowledges that EWGs are in the business of “*selling electric energy*,” not *reducing* energy use. (*Id.*; emphasis added.)

¹⁴ Joint Parties Opening Brief, at pp. 13, 15-17.

¹⁵ Joint Parties Opening Brief, at pp. 14-17. SCE’s and DRA’s erroneous attempts to apply PU Code §331 definitions of marketers, brokers, or aggregators to DRPs completely ignore the qualifying words in the statute (“purchase and sale of electric power”) and its enactment that predated demand response services without amendment since to include DRPs.

¹⁶ SCE Opening Brief, at p. 10.

As to SCE's proposed "condition," however, the Joint Parties do have certain concerns. It is the Joint Parties' understanding that required CAISO "approval" relates to the IOUs determining whether a customer is eligible to participate directly with the third-party DRP in wholesale market transactions, which would be limited to only one DRP per account. DRPs will have to be financially and technically capable of entering into transactions with the CAISO or compensate a scheduling coordinator to interface with the CAISO on its behalf.

SCE's recommendation suggests that DRPs should also be required to demonstrate financial viability and consumer protections to the UDC or LSE. While Joint Parties are willing to discuss conditions on DRP participation in jurisdictional utility programs that are administered by the Commission, the Joint Parties would object to the IOUs being in the position of determining whether DRPs can participate in its service territory and being able to potentially frustrate third-party DRP participation for competitive reasons.

III. CONCLUSION

Based on the applicable facts and law addressed herein, the Joint Parties urge the Commission to determine that DRPs are not "public utilities" and are not "electric service providers" subject to this Commission's jurisdiction. Consumer protection rules, if needed, should be embedded by the CAISO in jurisdictional tariffs or administered by the Commission, pursuant to development of the rules through an appropriate process.

Respectfully submitted,

January 29, 2010

/s/ SARA STECK MYERS

Sara Steck Myers
Attorney for the **Joint Parties**

122 - 28th Avenue
San Francisco, CA 94121
Telephone: 415-387-1904
Facsimile: 415-387-4708
Email: ssmyers@att.net

CERTIFICATE OF SERVICE

I, Sara Steck Myers, am over the age of 18 years and employed in the City and County of San Francisco. My business address is 122 - 28th Avenue, San Francisco, California 94121.

On January 29, 2010, I served the within document **REPLY BRIEF OF ENERNOC, INC., ENERGYCONNECT, INC., AND CPOWER, INC., ON JURISDICTIONAL ISSUES**, in R.07-01-041, as prescribed by the Commission's Rules of Practice and Procedure and with additional and separate delivery of hard copies by U.S. Mail to Assigned Commissioner Grueneich and Assigned ALJs Hecht, Sullivan, and Farrar at San Francisco, California.

Executed on January 29, 2010, at San Francisco, California.

SARA STECK MYERS

Sara Steck Myers

**Electronic and U.S. Mail Service List
R.07-01-041 (DR)
January 29, 2010**

Electronic Service List

sdebroff@rhoads-sinon.com
keith.mccrea@sabl原因.com
rmettling@bluepointenergy.com
spatrick@sempra.com
klatt@energyattorney.com
douglass@energyattorney.com
janet.combs@sce.com
liddell@energyattorney.com
ames_doug@yahoo.com
nes@a-klaw.com
jellis@resero.com
peter.maltbaek@cpowered.com
lms@cpuc.ca.gov
marcel@turn.org
mflorio@turn.org
rcounihan@enernoc.com
saw0@pge.com
jeffgray@dwt.com
irene@igc.org
ssmyers@att.net
wbooth@booth-law.com
kowalewskia@calpine.com
eric@strategyi.com
ja_boothe@yahoo.com
rquattrini@energyconnectinc.com
bhines@svlg.net
brbarkovich@earthlink.net
martinhomec@gmail.com
bdicapo@caiso.com
Inavarro@edf.org
kmills@cfbf.com
elvine@lbl.gov
clark.pierce@us.landisgyr.com
nplanson@consumerpowerline.com
gesmith@ecsny.com
apetersen@rhoads-sinon.com
miino@rhoads-sinon.com
CCole@currentgroup.com

bcragg@goodinmacbride.com
bdille@jmpsecurities.com
joshdavidson@dwt.com
bobgex@dwt.com
sdhilton@stoel.com
salleyoo@dwt.com
cem@newsdata.com
crmd@pge.com
regrelcpuccases@pge.com
mrh2@pge.com
hxag@pge.com
rwalther@pacbell.net
Service@spurr.org
cpjoe@gepllc.com
sean.beatty@mirant.com
smithmj@calpine.com
philha@astound.net
alex.kang@itron.com
jody_london_consulting@earthlink.net
ted@energy-solution.com
mrw@mrwassoc.com
cpucdockets@keyesandfox.com
rschmidt@bartlewells.com
stevek@kromer.com
glbarbose@lbl.gov
clamasbabbini@comverge.com
agartner@energyconnectinc.com
emahlon@ecoact.org
janreid@coastecon.com
arg@enertechnologies.com
jshields@ssjid.com
joyw@mid.org
rogerv@mid.org
tomk@mid.org
jweil@aglet.org
clark.bernier@rlw.com
gayatri@jbsenergy.com
jeff@jbsenergy.com

stephen.baker@constellation.com
tcarlson@rrienergy.com
dviolette@summitblue.com
kcooney@summitblue.com
sschare@summitblue.com
barrettlarry@comcast.net
david@nemtzwow.com
jcluboff@lmi.net
david.reed@sce.com
joyce.leung@sce.com
marian.brown@sce.com
mark.s.martinez@sce.com
andrea.horwatt@sce.com
carl.silsbee@sce.com
Case.Admin@sce.com
Jennifer.Shigekawa@sce.com
ka-wing.poon@sce.com
larry.cope@sce.com
garwacrd@sce.com
dwood8@cox.net
cfpena@sempra.com
jlaun@apogee.net
dbarker@semprautilities.com
jyamagata@semprautilities.com
ksmith2@semprautilities.com
LDavidson@semprautilities.com
CentralFiles@semprautilities.com
LWrizen@semprautilities.com
Dave.Hanna@itron.com
gayres@energycoalition.org
dwylie@aswengineering.com
hvidstenj@kindermorgan.com
shawn_cox@kindermorgan.com
mtierney-lloyd@enernoc.com
pk@utilitycostmanagement.com
chris@emeter.com
sue.mara@rtoadvisors.com
Paul.karr@trilliantnetworks.com
sharon@emeter.com
theresa.mueller@sfgov.org
mgm@cpuc.ca.gov
tcr@cpuc.ca.gov
srovetti@sfwater.org

dgrandy@caonsitegen.com
rmccann@umich.edu
demorse@omsoft.com
jgoodin@caiso.com
mgillette@enernoc.com
e-recipient@caiso.com
brian.theaker@dynegy.com
lwhouse@innercite.com
mary.lynch@constellation.com
cmkehrrein@ems-ca.com
dhungerf@energy.state.ca.us
msherida@energy.state.ca.us
bernardo@braunlegal.com
abb@eslawfirm.com
ttutt@smud.org
vwood@smud.org
bboice02@yahoo.com
karen@klindh.com
rogerl47@aol.com
sas@a-klaw.com
bschuman@pacific-crest.com
laura.rooke@pgn.com
jholmes@emi1.com
tylerb@poweritsolutions.com
dserio@ecsgrid.com
ag2@cpuc.ca.gov
agc@cpuc.ca.gov
bsk@cpuc.ca.gov
cec@cpuc.ca.gov
crv@cpuc.ca.gov
edf@cpuc.ca.gov
dnl@cpuc.ca.gov
edd@cpuc.ca.gov
hcf@cpuc.ca.gov
jc8@cpuc.ca.gov
jhe@cpuc.ca.gov
joc@cpuc.ca.gov
jym@cpuc.ca.gov
kkm@cpuc.ca.gov
mjd@cpuc.ca.gov
jpn@cpuc.ca.gov
wtr@cpuc.ca.gov
skg@cpuc.ca.gov

tburke@sewater.org
dcengel@fscgroup.com
elaine.s.wei@pjc.com
snuller@ethree.com
jwwd@pge.com
filings@a-klaw.com
kea3@pge.com
lhj2@pge.com
MAGq@pge.com

tjs@cpuc.ca.gov
ys2@cpuc.ca.gov
claufenb@energy.state.ca.us
mpa@a-klaw.com
cpuccases@pge.com
SRH1@pge.com
aliddell@icfi.com
steven@sfpower.org
ahmad.faruqui@brattle.com

U.S. Mail Service List

Parties

SCOTT H. DEBROFF
RHODAS & SINON LLP
ONE SOUTH MARKET SQUARE, PO BOX 1146
HARRISBURG, PA 17108-1146
FOR: ELSTER INTEGRATED SOLUTIONS;
CELLNET & TRILLIANT NETWORKS, INC.;
CONSUMER POWERLINE AND ANCILLIARY
SERVICES COALITION.

KEITH R. MCCREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN, LLP
1275 PENNSYLVANIA AVE., N.W.
WASHINGTON, DC 20004-2415
FOR: CA MANUFACTURERS & TECHNOLOGY ASSN.

KEN SKINNER
VICE PRESIDENT, COO
INTEGRAL ANALYTICS, INC
312 WALNUT STREET, SUITE 1600
CINCINNATI, OH 45202

JAMES R. METTLING
BLUE POINT ENERGY LLC
20 INDUSTRIAL PARKWAY
CARSON CITY, NV 89706
FOR: BLUE POINT ENERGY

STEVEN D. PATRICK
ATTORNEY AT LAW
SEMPRA ENERGY
555 WEST FIFTH STREET, STE 1400
LOS ANGELES, CA 90013-1011
FOR: SAN DIEGO GAS & ELECTRIC

GREGORY KLATT
ATTORNEY AT LAW
DOUGLASS & LIDDELL
411 E. HUNTINGTON DRIVE, STE. 107-356
ARCADIA, CA 91006
FOR: DIRECT ACCESS CUSTOMER COALITION

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367
FOR: ALLIANCE FOR RETAIL ENERGY
MARKETS/WESTERN POWER TRADING FORUM

JANET COMBS
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

DONALD C. LIDDELL
ATTORNEY AT LAW
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
FOR: WAL-MART STORES, INC./ICE
ENERGY/KINDER MORGAN / CALIF. ENERGY
STORAGE ALLIANCE

DOUGLAS A. AMES
ATTORNEY AT LAW
TRANSPHASE SYSTEMS, INC.
4971 LOS PATOS AVENUE
HUNTINGTON BEACH, CA 92649
FOR: TRANSPHASE

NORA SHERIFF
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94015
FOR: ENERGY PRODUCERS & USERS COALITION

JACK ELLIS
PRINCIPAL CONSULTANT
RESERO CONSULTING
490 RAQUEL COURT
LOS ALTOS, CA 94022

PETER MALTBAEK
VICE PRESIDENT
CPOWER, INC.
1185 ELENA PRIVADA
MOUNTAIN VIEW, CA 94040
FOR: CONSUMER POWELINE

FOR: ENERGY CONNECT, INC.
LISA-MARIE SALVACION
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DIVISION OF RATEPAYERS ADVOCATES

MARCEL HAWIGER
ENERGY ATTORNEY
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: TURN

MICHEL PETER FLORIO
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: TURN

RICHARD H. COUNIHAN
SR. DIRECTOR CORPORATE DEVELOPMENT
ENERNOC, INC.
500 HOWARD ST., SUITE 400
SAN FRANCISCO, CA 94105
FOR: ENERNOC, INC.

SHIRLEY WOO
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
FOR: PACIFIC GAS AND ELECTRIC

JEFFREY P. GRAY
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
FOR: SOUTH SAN JOAQUIN IRRIGATION
DISTRICT

IRENE K. MOOSEN
ATTORNEY AT LAW
CITY AND COUNTY OF SAN FRANCISCO
53 SANTA YNEZ AVE.
SAN FRANCISCO, CA 94112
FOR: CITY AND COUNTY OF SAN FRANCISCO

SARA STECK MYERS
ATTORNEY AT LAW
122 28TH AVENUE
SAN FRANCISCO, CA 94121
FOR: JOINT PARTIES

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICES OF WILLIAM H. BOOTH
67 CARR DRIVE
MORAGA, CA 94556
FOR: CLECA

AVIS KOWALEWSKI
CALPINE CORPORATION
4160 DUBLIN BLVD, SUITE 100
DUBLIN, CA 94568
FOR: CALPINE CORPORATION

ERIC C. WOYCHIK
STRATEGY INTEGRATION LLC
9901 CALODEN LANE
OAKLAND, CA 94605
FOR: COMVERGE, INC.

JAMES BOOTHE
THE ENERGY COALITION
9 REBELO LANE
NOVATO, CA 94947
FOR: THE ENERGY COALITION

RICH QUATTRINI
VICE PRESIDENT - WESTERN REGION
ENERGYCONNECT, INC.
51 E. CAMPBELL AVENUE, SUITE 145
CAMPBELL, CA 95008
FOR: ENERGY CONNECT, INC.

BOB HINES
ENERGY PROGRAMS
SILICON VALLEY LEADERSHIP GROUP
224 AIRPORT PARKWAY, SUITE 620
SAN JOSE, CA 95110
FOR: SILICON VALLEY LEADERSHIP GROUP

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
FOR: CALIFORNIA LARGE ENERGY CONSUMERS
ASSOCIATION

MARTIN HOMEK
ATTORNEY AT LAW
CALIFORNIANS FOR RENEWABLE ENERGY, INC.
PO BOX 4471
DAVIS, CA 95617
FOR: CALIFORNIA FOR RENEWABLE ENERGY,

BALDASSARO DI CAPO
COUNSEL
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA INDEPENDENT SUSTEM

INC.
LAUREN NAVARRO
ATTORNEY
ENVIRONMENTAL DEFENSE FUND
1107 9TH STREET, SUITE 540
SACRAMENTO, CA 95814
FOR: ENVIRONMENTAL DEFENSE FUND

OPERATOR
KAREN N. MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
FOR: CALIFORNIA FARM BUREAU FEDERATION

Information Only

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

CLARK E. PIERCE
LANDIS & GYR
246 WINDING WAY
STRATFORD, NJ 08084

NICHOLAS J. PLANSON
CONSUMER POWERLINE
17 STATE STREET, SUITE 1910
NEW YORK, NY 10004
FOR: CONSUMER POWERLINE

GLEN E. SMITH
PRESIDENT AND CEO
ENERGY CURTAILMENT SPECIALISTS, INC.
PO BOX 610
CHEEKTOWAGA, NY 14225-0610

ALICIA R. PETERSEN
RHOADS & SINON LLP
ONE SOUTH MARKET SQUARE, PO BOX 1146
HARRISBURG, PA 17108

MONICA S. IINO
RHOADS & SINON LLP
M&T BUILDING
ONE SOUTH MARKET SQUARE, PO BOX 1146
HARRISBURG, PA 17108

CLINTON COLE
CURRENT GROUP, LLC
20420 CENTURY BOULEVARD
GERMANTOWN, MD 20874

GRAYSON HEFFNER
15525 AMBIANCE DRIVE
N. POTOMAC, MD 20878

STEPHEN D. BAKER
SR. REG. ANALYST, FELLOW-MCCORD AND ASS.
CONSTELLATION NEW ENERGY-GAS DIVISION
9960 CORPORATE CAMPUS DRIVE, SUITE 2500
LOUISVILLE, KY 40223

TRENT A. CARLSON
RRI ENERGY, INC.
1000 MAIN STREET
HOUSTON, TX 77001

DANIEL M. VIOLETTE
SUMMIT BLUE CONSULTING
1722 14TH STREET, SUITE 230
BOULDER, CO 80302

KEVIN COONEY
PRINCIPAL/CEO
SUMMIT BLUE CORPORATION
1722 14TH STREET, SUITE 230
BOULDER, CO 80302

STUART SCHARE
SUMMIT BLUE CONSULTING
1722, 14TH STREET, SUITE 230
BOULDER, CO 80302
FOR: SUMMIT BLUE CONSULTING

LARRY B. BARRETT
CONSULTING ASSOCIATES, INC.
PO BOX 60429
COLORADO SPRINGS, CO 80960

WILLIAM D. ROSS
CONSTELLATION NEW ENERGY
520 SO. GRAND AVENUE SUITE 3800
LOS ANGELES, CA 90071-2610
FOR: CONSTELLATION NEW ENERGY

DAVID NEMTZOW
NEMTZOW & ASSOCIATES
1254 9TH STREET, NO. 6
SANTA MONICA, CA 90401

JAY LUBOFF
JAY LUBOFF CONSULTING SERVICES
1329 19TH ST, APT D
SANTA MONICA, CA 90404-1946

DAVID REED
SOUTHERN CALIFORNIA EDISON
6060 IRWINDALE AVE., STE. J
IRWINDALE, CA 91702

JOYCE LEUNG
SOUTHERN CALIFORNIA EDISON COMPANY
6060 J IRWINDALE AVE.
IRWINDALE, CA 91702

MARIAN BROWN
SOUTHERN CALIFORNIA EDISON
6040A IRWINDALE AVE.
IRWINDALE, CA 91702

MARK S. MARTINEZ
SOUTHERN CALIFORNIA EDISON
6060 IRWINDALE AVE., SUITE J
IRWINDALE, CA 91702

ANDREA HORWATT
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

CARL SILSBEE
SOUTHERN CALIFORNIA EDISON
G01, RP&A
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
LAW DEPARTMENT, ROOM 370
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

JENNIFER TSAO SHIGEKAWA
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

KA-WING MAGGIE POON
G01, QUAD 2B
2244 WALNUT GROVE AVE.
ROSEMEAD, CA 91770

LARRY R. COPE
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON
PO BOX 800, 2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
FOR: SOUTHERN CALIFORNIA EDISON

RUSS GARWACRD
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE
ROSEMEAD, CA 91770

DON WOOD
PACIFIC ENERGY POLICY CENTER
4539 LEE AVENUE
LA MESA, CA 91941

CARLOS F. PENA
SEMPRA ENERGY
101 ASH STREET, HQ12
SAN DIEGO, CA 92101

JOHN LAUN
APOGEE INTERACTIVE, INC.
1220 ROSECRANS ST., SUITE 308
SAN DIEGO, CA 92106

DAVID BARKER
SAN DIEGO GAS & ELECTRIC COMPANY
8306 CENTURY PARK COURT
SAN DIEGO, CA 92123

JOY C. YAMAGATA
SAN DIEGO GAS & ELECTRIC/SOCALGAS
8330 CENTURY PARK COURT, CP 32 D
SAN DIEGO, CA 92123

KATHRYN SMITH
ANALYST
SAN DIEGO GAS AND ELECTRIC COMPANY
8306 CENTURY PARK COURT
SAN DIEGO, CA 92123

LISA DAVIDSON
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32A
SAN DIEGO, CA 92123

CENTRAL FILES
REGULATORY AFFAIRS
SAN DIEGO GAS & ELECTRIC CO.
8330 CENTURY PARK COURT-CP31E
SAN DIEGO, CA 92123-1530

LINDA WRAZEN
REGULATORY CASE ADMINISTRATOR
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123-1530

DAVE HANNA
ITRON INC
11236 EL CAMINO REAL
SAN DEIGO, CA 92130-2650

GEOFF AYRES
THE ENERGY COALITION
15615 ALTON PARKWAY, SUITE 245

WARREN MITCHELL
THE ENERGY COALITION
15615 ALTON PARKWAY, SUITE 245

IRVINE, CA 92618
DAVID M. WYLIE, PE
ASW ENGINEERING
2512 CHAMBERS ROAD, SUITE 103
TUSTIN, CA 92780

IRVINE, CA 92618
JOEL M. HVIDSTEN
KINDER MORGAN ENERGY FORECASTER
1100 TOWN & COUNTRY ROAD, SUITE 700
ORANGE, CA 92868

SHAWN COX
KINDER MORGAN ENERGY FORECASTER
1100 TOWN & COUNTRY ROAD, SUITE 700
ORANGE, CA 92868

MONA TIERNEY-LLOYD
SENIOR MANAGER WESTERN REG. AFFAIRS
ENERNOC, INC.
PO BOX 378
CAYUCOS, CA 93430

PAUL KERKORIAN
UTILITY COST MANAGEMENT LLC
6475 N. PALM AVENUE, SUITE 105
FRESNO, CA 93704

CHRIS KING
EMETER CORPORATION
2215 BRIDGEPOINTE PARKWAY, SUITE 300
SAN MATEO, CA 94044

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

PAUL KARR
TRILLIANT NETWORKS, INC.
1100 ISLAND DRIVE, SUITE 103
REDWOOD CITY, CA 94065

SHARON TALBOTT
EMETER CORPORATION
ONE TWIN DOLPHIN DRIVE
REDWOOD CITY, CA 94065

THERESA MUELLER
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL, ROOM 234
SAN FRANCISCO, CA 94102

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

THOMAS ROBERTS
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

THERESA BURKE
REGULATORY AFFAIRS ANALYST
SAN FRANCISCO PUC
1155 MARKET STREET, 4TH FLOOR
SAN FRANCISCO, CA 94103

DANIEL C. ENGEL
SENIOR CONSULTANT
FREEMAN, SULLIVAN & CO.
101 MONTGOMERY STREET, 15TH FLOOR
SAN FRANCISCO, CA 94104

ELAINE S. KWEI
PIPER JAFFRAY & CO
345 CALIFORNIA ST. SUITE 2300
SAN FRANCISCO, CA 94104

SNULLER PRICE
ENERGY AND ENVIRONMENTAL ECONOMICS
101 MONTGOMERY, SUITE 1600
SAN FRANCISCO, CA 94104

STEVE GEORGE
GSC GROUP
101 MONTGOMERY STREET, 15TH FLOOR
SAN FRANCISCO, CA 94104

BRUCE PERLSTEIN
PACIFIC GAS AND ELECTRIC COMPANY
245 MARKET STREET
SAN FRANCISCO, CA 94105

JOSEPHINE WU
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105

KEN ABREN
245 MARKET STREET
SAN FRANCISCO, CA 94105

LISE H. JORDAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

MARY A. GANDESBERY
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442, 77 BEALE B30A
SAN FRANCISCO, CA 94105

MICHAEL P. ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
33 NEW MONTGOMERY STREET, SUITE 1850
SAN FRANCISCO, CA 94105

REGULATORY FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105

STEVEN R. HAERTLE
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

ALICE LIDDELL
ICF INTERNATIONAL
620 FOLSOM STREET, STE, 200
SAN FRANCISCO, CA 94107

STEVEN MOSS
SAN FRANCISCO COMMUNITY POWER
2325 THIRD STREET, STE 344
SAN FRANCISCO, CA 94107

AHMAD FARUQUI
THE BRATTLE GROUP
353 SACRAMENTO STREET, SUITE 1140
SAN FRANCISCO, CA 94111

BRAD MANUILOW
AMERICAN TECHNOLOGY RESEARCH
450 SANSOME ST., SUITE 1000
SAN FRANCISCO, CA 94111

BRIAN T. CRAGG
GOODIN, MACBRIDE, SQUERI, DAY & LAMPREY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: NORTH AMERICA POWER PARTNERS LLC

BRYCE DILLE
CLEAN TECHNOLOGY RESEARCH
JMP SECURITIES
600 MONTGOMERY ST. SUITE 1100
SAN FRANCISCO, CA 94111

J. JOSHUA DAVIDSON
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111

ROBERT GEX
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111

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

SALLE E. YOO
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

CALIFORNIA ENERGY MARKETS
425 DIVISADERO STREET, SUITE 303
SAN FRANCISCO, CA 94117

CHARLES MIDDLEKAUFF
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
FOR: PACIFIC GAS AND ELECTRIC COMPANY

CASE ADMINISTRATION
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 770000; MC B9A
SAN FRANCISCO, CA 94177

MARK HUFFMAN
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
MC B30A PO BOX 770000
SAN FRANCISCO, CA 94177
FOR: PACIFIC GAS AND ELECTRIC COMPANY

HELEN ARRICK
BUSINESS ENERGY COALITION
MC B8R, PGE
PO BOX 770000
SAN FRANCISCO, CA 94177-0001

ROBIN J. WALTHER, PH.D.
1380 OAK CREEK DRIVE., 316
PALO ALTO, CA 94305

MICHAEL ROCHMAN
MANAGING DIRECTOR
SPURR
1430 WILLOW PASS ROAD, SUITE 240
CONCORD, CA 94520

JOE PRIJYANONDA
GLOBAL ENERGY PARTNERS, LLC
3569 MT. DIABLE BLVD., SUITE 200
LAFAYETTE, CA 94549

SEAN P. BEATTY
SR. MGR. EXTERNAL & REGULATORY AFFAIRS
MIRANT CALIFORNIA, LLC
696 WEST 10TH ST., PO BOX 192
PITTSBURG, CA 94565

MARK J. SMITH
CALPINE CORPORATION
4160 DUBLIN BLVD., SUITE 100
DUBLIN, CA 94568

PHILIPPE AUCLAIR
11 RUSSELL COURT
WALNUT CREEK, CA 94598

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

JODY S. LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND, CA 94609

TED POPE
PRESIDENT
ENERGY SOLUTIONS
1610 HARRISON STREET
OAKLAND, CA 94612

MRW & ASSOCIATES, INC.
1814 FRANKLIN STREET, SUITE 720
OAKLAND, CA 94612

DOCKET COORDINATOR
5727 KEITH ST.
OAKLAND, CA 94618

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

STEVE KROMER
3110 COLLEGE AVENUE, APT 12
BERKELEY, CA 94705
FOR: STEVE KROMER

GALEN BARBOSE
LAWRENCE BERKELEY NATIONAL LAB
MS 90-4000
1 CYCLOTRON RD.
BERKELEY, CA 94720

CARLOS LAMAS-BABBINI
COMVERGE, INC.
58 MT TALLAC CT
SAN RAFAEL, CA 94903

ALAN GARTNER
ENERGYCONNECT, INC.
51 E. CAMPBELL AVEUNE, 145
CAMPBELL, CA 95008

MAHLON ALDRIDGE
ECOLOGY ACTION
PO BOX 1188
SANTA CRUZ, CA 95061-1188

L. JAN REID
COAST ECONOMIC CONSULTING
3185 GROSS ROAD
SANTA CRUZ, CA 95062

ALAN GARTNER
1125 PHEASANT HILL WAY
SAN JOSE, CA 95120

JEFF SHIELDS
UTILITY SYSTEMS DIRECTOR
SOUTH SAN JOAQUIN IRRIGATION DISTRICT
11011 E. HWY 120
MANTECA, CA 95336

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

ROGER VAN HOY
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

THOMAS S. KIMBALL
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354

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

CLARK BERNIER
RLW ANALYTICS
1055 BROADWAY, SUITE G
SONOMA, CA 95476

GAYATRI SCHILBERG
JBS ENERGY
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95605
FOR: TURN

JEFF NAHIGIAN
JBS ENERGY, INC.
311 D STREET
WEST SACRAMENTO, CA 95605

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

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

DAVID MORSE
1411 W. COVELL BLVD., STE. 106-292
DAVIS, CA 95616-5934

JOHN GOODIN
CALIFORNIA ISO
151 BLUE RAVINE RD.
FOLSOM, CA 95630

MELANIE GILLETTE
SR MGR WESTERN REG. AFFAIRS
ENERNOC, INC.
115 HAZELMERE DRIVE
FOLSOM, CA 95630

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

BRIAN THEAKER
DYNEGY, INC.
3161 KEN DEREK LANE
PLACERVILLE, CA 95667

LON W. HOUSE, PH.D
ASSOCIATION OF CAL WATER AGENCIES
4901 FLYING C RD.
CAMERON PARK, CA 95682

MARY LYNCH
VP - REGULATORY AND LEGISLATIVE AFFAIRS
CONSTELLATION ENERGY COMMODITIES GRP
5074 NAWAL DRIVE
EL DORADO HILLS, CA 95762

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

DAVID HUNGERFORD
CALIFORNIA ENERGY COMMISSION
DEMAND ANALYSIS OFFICE
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814

MARGARET SHERIDAN
CALIFORNIA ENERGY COMMISSION
DEMAND ANALYSIS OFFICE
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814

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

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON SCHNEIDER & HARRIS, LLP (1359)
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CA 95816-5905

TIMOTHY N. TUTT
SACRAMENTO MUNICIPAL UTILITIES DISTRICT
6201 S. STREET, M.S. B404
SACRAMENTO, CA 95817-1899

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

BARB BOICE
4309 NORWOOD AVENUE, APT. 160
SACRAMENTO, CA 95838

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

ROGER LEVY
LEVY AND ASSOCIATES
2805 HUNTINGTON ROAD
SACRAMENTO, CA 95864

ANNIE STANGE
ALCANTAR & KAHL
1300 SW FIFTH AVE., SUITE 1750
PORTLAND, OR 97201

BENJAMIN SCHUMAN
PACIFIC CREST SECURITIES
111 SW 5TH AVE, 42ND FLR
PORTLAND, OR 97204

LAURA ROOKE
SR. PROJECT MANAGER
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST.,
PORTLAND, OR 97204

JENNIFER HOLMES
ENERGY MARKET INNOVATIONS INC.
83 COLUMBIA STREET, SUITE 303
SEATTLE, WA 98104

TYLER BERGAN
POWERIT SOLUTIONS
114 ALASKAN WAY SOUTH, NO. 201
SEATTLE, WA 98104

State Service

DENISE SERIO
ENERGY CURTAILMENT SPECIALISTS, INC.
4455 GENESEE STREET, BLDG. 6
NEW YORK, NY 14225

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

ANDREW CAMPBELL
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5203
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

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

DARWIN FARRAR
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5041
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

ELIZABETH DORMAN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE

HAZLYN FORTUNE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE

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

SAN FRANCISCO, CA 94102-3214
JESSICA T. HECHT
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5113
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOE COMO
CALIF PUBLIC UTILITIES COMMISSION
DRA - ADMINISTRATIVE BRANCH
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

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

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

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

PAMELA NATALONI
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5124
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

REBECCA TSAI-WEI LEE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SUDHEER GOKHALE
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
ROOM 4102
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

TIMOTHY J. SULLIVAN
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 2106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

YULIYA SHMIDT
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS BRA
ROOM 4104
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CLARE LAUFENBERG
STRATEGIC TRANSMISSION INVESTMNT PROGRAM
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 46
SACRAMENTO, CA 95814