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

Application of Pacific Gas and Electric Company for Approval of Agreements Related to the Novation of the California Department of Water Resources Agreement with GWF Energy LLC, Power Purchase Agreement with GWF Energy II LLC, and Associated Cost Recovery (U39E).

Application 09-10-022  
(Filed October 16, 2009)

Application of Pacific Gas and Electric Company for Approval of the Novation of the California Department of Water Resources Agreements Related to the Calpine Transaction, and Associated Cost Recovery (U39E).

Application 09-10-034  
(Filed October 30, 2009)

**CALIFORNIANS FOR RENEWABLE ENERGY OPENING BRIEF**

**I. INTRODUCTION AND SUMMARY OF ARGUMENT**

Californians for Renewable Energy (CARE) submits this opening brief pursuant to the California Public Utilities Commission (Commission)'s Rules of Practice and Procedure. This brief addresses the issues described in the January 5, 2010, scoping memorandum as well as a directive by the assigned Administrative Law Judge sent by email dated January 25, 2010. It is organized as agreed during an all-party conference call.

Not all the power plants requested for approval by A.09-09-021, A.09-10-022, and A.09-10-034 should be approved. The Commission has already approved A.09-04-001 for 184 MW. The new requests are for load-following power plants that are needed to operate in combination with renewable resources such as solar and wind power. These power plants have to be able to operate with the flexibility needed. CARE believes that the Calpine 2 contract requests a power plant that does not meet that standard.

The criteria used to choose the power plants should include the principles of environmental justice. These principles include locating power plants close to the points that are forecast to use most of the power generated.

The Environmental Protection Agency recently proposed to strengthen the national ambient air quality standards for ground-level ozone. Ground-level ozone is a primary component of smog. The proposed revisions are based on scientific evidence about ozone and its effects on people and sensitive trees and plants.<sup>1</sup> The data accompanying this announcement states that the locations for the proposed power plants in Contra Costa County and Alameda County currently exceed ground-level ozone limits. Since these air emissions have been found to be harmful to people, the power plant locations should be chosen to minimize the air emission impacts to local residents.

CARE represents the poor people and people of color who often reside in the areas in which power plants are located. That is why CARE supported the PG&E application, A.09-02-019, the proposed Photovoltaic (PV) Program which allows additional electric generation during peak demands and eliminates the need to operate fossil fueled plants. CARE is also concerned about the environmental impacts related to the project sites, and the impacts power plant projects might have on neighboring agricultural lands.

On October 16, 2009, PG&E filed Application 09-10-022 to obtain approval of the five contracts that comprise the GWF Transaction. If the Novation Agreement between the California Department of Water Resources (DWR), PG&E and GWF, the Replacement Agreement, and Restated MRTU Agreement between GWF and PG&E are approved, PG&E would replace DWR as the buyer of energy and capacity from three existing facilities owned by GWF. If the Tracy Upgrade Power Purchase Agreement (PPA) is approved, PG&E would procure an additional 145 megawatts (MW) of new capacity from the conversion of the Tracy combustion turbine facility to a combined cycle steam turbine generator for an additional 10 years. Finally, if approved, the Transition Agreement would re-allocate generation to allow for continued deliveries and the acceleration of the Tracy Upgrade's on-line date to 2012.

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<sup>1</sup> <http://www.epa.gov/groundlevelozone/actions.html>

On October 30, 2009, PG&E filed Application 09-10-034 to obtain approval of the five contracts involving affiliates of Calpine Corporation (Calpine) that comprise the Calpine Transaction. If the Calpine 2 Novation Agreement between DWR, PG&E and Calpine, and the Replacement Agreement between Calpine and PG&E are approved, PG&E would replace DWR as the buyer of energy and capacity related to DWR's existing Calpine 2 contract. In addition, if the Novation Agreement between the DWR, PG&E and Calpine, and the Replacement Agreement between Calpine and PG&E are approved, PG&E would replace DWR as the buyer of energy and capacity related to DWR's existing Calpine 3 contract. Finally, if the Los Esteros Critical Energy Facility (LECEF) Upgrade PPA is approved, PG&E would procure an additional 109 MW of new capacity from the conversion of the LECEF combustion turbine facility to a combined cycle steam turbine generator for an additional 10 years.

The GWF and LECEF upgrade portions of the novations contracts are a collateral attack on D. 07-12-052. In D. 07-12-052 the Commission authorized 800-1200 MW of new generation plus allowed PG&E another 312 MW of authorized procurement to replace the Eastshore and Bullard Projects. PG&E admits that the two upgrades constitute more MW than the Commission has authorized.<sup>2</sup> First PG&E argued that decision D. 08-11-056 authorized PG&E to procure additional MW through the novation process. PG&E apparently has abandoned that position and now states that the incremental capacity provided by the LECEF and GWF is needed to mitigate the risk of potential project delays or terminations.<sup>3</sup> PG&E cites the difficult environment that power plant developers face in siting new projects. If PG&E believes that the viability of the GWF and LECEF Upgrades warrant their approval because the projects they have selected are not viable then PG&E must sacrifice other generation in A. 09-09-021 to comply with D. 07-12-052. PG&E's attempt to relitigate its need determination in D. 07-12-052 in these two novation dockets must be rejected. There is substantial evidence which includes an unprecedented economic downturn, a new lower 2009 CEC Revised Demand Forecast, and a new power flow analysis for Path

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<sup>2</sup> PG&E Supplemental Testimony, pages 1-6 to 1-9 and 1-12 to 1-17.

<sup>3</sup> PG&E Reply Testimony page 4

26 that makes some or all of these projects unneeded and imposes costs on ratepayers which are unnecessary.

## **II. BACKGROUND**

A. The Direct Access proceeding R.07-05-025 resulted in Decision D. 08-11-056, which directed the IOUs to pursue novation or replacement of the DWR long-term contracts in order to expedite DWR's removal from the electric supply marketplace. PG&E has attempted to use this mechanism to add another 254 MW of new generation through upgrades to the existing GWF and LECEF facilities. D. 07-12-052 authorized PG&E to procure 800- 1200 MW of new generation and also authorized PG&E to procure another 312 MW to replace projects that failed from the previous RFO bringing the total authorized need to 1,112 to 1,512 MW. PG&E has already submitted and gained approval for the 184 MW Mariposa Project in 09-04-001. In A. 09-09-021 PG&E has submitted for approval two projects the Oakley Project and the Marsh landing Project which totals 1,305 MW bringing the total requested approval for new generation to 1,489 MW. PG&E now seeks to relitigate their need determined in D. 07-12-052 by adding an additional 254 MW through the approval of the LECEF and GWF Upgrades.

D.09-08-031 states that the Commission will not be making any findings as to the reasonableness of any existing California Department of Water Resources (DWR) contracts which are included for Commission approval in the applications as the novated contracts. Therefore, the Commission should not approve the novated contracts requested in these applications. Instead, the Commission should consider all the proposed power plants including the replacement contracts proposed in the above captioned proceedings as options that could be chosen to achieve a maximum of 1,112 MW of new generating capacity.

This recommendation is consistent with the terms of the existing and the proposed contracts because the novated GWF power purchase agreement expires before the proposed replacement contract requires delivery of services, CARE recommends rejecting the Calpine 2 replacement and novated contracts, and the Calpine 3 contract extends the terms of the existing contract.

The issue of novating existing contracts for wholesale electricity purchases entered into by the California Department of Water Resources during the western energy crisis of 2000-1 was addressed in Commission Rulemaking (R.) 07-05-025. CARE was a party to that proceeding and disagreed with the Decision (D.) 08-11-056 ending the proceeding because the United States Supreme Court<sup>4</sup> found that the validity of the contracts could not be assured without further review and remanded the review of those contracts to the Federal Energy Regulatory Commission (FERC), since contracts may not be valid if they are not negotiated properly:

“Like fraud and duress, unlawful market activity that directly affects contract negotiations eliminates the premise on which the Mobile-Sierra presumption rests: that the contract rates are the product of fair, arms-length negotiations.<sup>5</sup>”

The Commission appears to agree that the contracts proposed for novation should not be addressed in any manner that would indicate Commission approval or a finding that the contracts were reasonable,<sup>6</sup> D.09-08-031, p. 3. Therefore, CARE believes that the Commission should not approve the novated contracts, but instead to remove those contracts from consideration. The above captioned applications should be reviewed without approval of the novated contracts.

Additionally, the California Legislature adopted SB 695 which removed the requirement for novation of the remaining contracts entered into by the State of California in 2001. SB 695 was signed into law during October 2009. Among other things, SB 695 amended Section 80110(e) of the Water Code to eliminate the requirement that the suspension of direct access continue until DWR no longer supplied power pursuant to the applicable Water Code provisions. Therefore, the PG&E effort to novate the GWF and Calpine DWR contracts is no longer required

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<sup>4</sup> *Morgan Stanley Capital Group, Inc. v. Public Utility District No. 1 of Snohomish County* (“Morgan Stanley”) (2008) 128 S.Ct. 2733

<sup>5</sup> *Ibid.*

<sup>6</sup> “The Decision states that the Commission will review any replacement agreement executed pursuant to DWR contract novation or other negotiations to determine whether the replacement contract is “just and reasonable” under Public Utilities Code section 451.<sup>6</sup> However, as the Decision notes: “the review of [the replacement contracts] will be separate and distinct from the setting in which the previously executed DWR contracts were negotiated and subsequently litigated.” (D.08-11-056, p. 83.) The Decision also states that any reasonableness review of the replacement agreements under section 451 should in no way be construed as affecting the disposition of any pending litigation relating to existing DWR contracts. (D.08-11-056, p. 90 [Conclusion of Law 8].)”

This does not mean that there should be two contracts operating simultaneously; the replacement contracts should be crafted to begin after the contracts proposed for novation have expired.

The issue of how much electric generating capacity is needed was addressed in the R.04-04-003 proceeding by D. 07-12-052 which determined that PG&E needed between 800 and 1200 MW, but also allowed PG&E to procure resources to replace those that were chosen in the 2006 LTRFO but were not ever placed in service. CARE believes that the combined electric power generation capacity requested in A.09-04-001, A.09-09-021, A.09-10-022, and A.09-10-034 should be considered as the new capacity contemplated by D.07-12-052.

**B. Description of Transactions**

CARE has nothing to add to this section.

**C. Procedural Background**

CARE has nothing to add to this section.

**III. ARGUMENT**

**A. Are The GWF And Calpine Transactions Consistent With Commission Policy And Decisions?**

**D. 07-12-052 limits PG&E's procurement authority to 1,112MW to 1, 512 MW**

D. 07-12-052 limits PG&E's procurement from 1,112 MW to 1,512 MW. PG&E has already submitted for approval 1,489 MW of new generation consisting of the Mariposa Project, the Marsh Landing Project and the Oakley Project. PG&E states that the incremental capacity provided by the LECEF and GWF is needed to mitigate the risk of potential project delays or terminations.<sup>7</sup> In D.07-12-052, the Commission authorized PG&E to conduct a Request for Offers to contract for 800 to 1200 MW of new generating capacity in its service territory by 2015. In addition, that decision also

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<sup>7</sup> PG&E Reply Testimony page 4.

allowed the utility to add an additional 312 MW for contracts which were terminated from the 2006 LTRFO. In total D. 07-12-052 authorized the utility to procure 1112 to 1512 MW. On April 1, 2009, PG&E filed A.09-04-001 and gained commission approval for 184 MW of the approved need. PG&E also filed A.09-09-021 on September 30, 2009, requesting approval of another 1305 MW from two new projects. Between A.09-04-001 and A.09-09-021, PG&E has already requested approval for 1,489 MW of new generation which is 98%, of its maximum procurement authority of 1512 MW authorized by D.07-12-052. PG&E justifies the additional unauthorized 254 MW of new incremental generation requested in the DWR novations to, “mitigate a qualitative risk of project delay or termination.”<sup>8</sup>

These GWF projects adhere to the stated need in D.07-12-052 for dispatchable ramping resources. The proposed LECEF upgrade with its long start times does not meet those needs.

In R.07-05-025, the Commission decided not to make a finding as to the reasonableness of the existing DWR contracts and stated that the Commission will not be making any findings as to the reasonableness of any existing DWR contracts. (D.08-11-056, p. 83; see also D.08-11-056, p. 90 [Conclusion of Law 7].)

#### **D. 07-12-052 already provides a mechanism for project failures**

In D. 07-12-52 the Commission increased PG&E’s need by 312 MW to replace the Eastshore and Bullard projects which failed from the previous RFO. This is the Commission approved method to replace projects which have not come to fruition. If the Commission approves all the contracts PG&E has requested approval for including Oakley, Marsh Landing, GWF, LECEF and Mariposa the ratepayers will stand to pay billions of dollars for projects that are not needed.

#### **There is substantial evidence that some of the projects and possibly all are not needed**

PG&E would like the Commission to approve 231 MW more than was authorized in D. 07-12-052. There is substantial evidence that instead of increasing PG&E’s procurement authority the Commission should actually reduce the number of MW PG&E

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<sup>8</sup> PG&E January 11, 2010 Supplemental Testimony page 2-9

can procure. “In September of 2009 the California Energy Commission Staff issued a revised demand and peak load forecast for the 2009 IEPR. According to the CEC’s revised forecast peak demand in 2015 will be 886 MW or 4.48% lower than the 2007 forecast.<sup>9</sup>

A more recent study released by the CEC that serves as a supplement to the 2009 IEPR demand forecast provides estimates of the incremental impacts of prospective CPUC funded energy efficiency programs in the years following 2012. That study estimates that 56 percent of energy growth from 2008-2020 projected in the 2009 IEPR demand forecast would be eliminated by estimated incremental uncommitted savings as the low estimate. The high estimate predicts that 74% percent of energy growth from 2008-2020 projected in the 2009 IEPR demand forecast would be eliminated by estimated incremental energy efficiency uncommitted savings.<sup>10</sup> This further reduces need in PG&E’s service territory for the 2008-2020 periods.

Also the CEC staff issued in October of 2008 a report entitled, REVISITING PATH 26 POWER FLOW ASSUMPTIONS. The report draws two conclusions that are important to any need determination that was authorized in D. 07-12-052. The first conclusion is that, “The 3,000 MW North to South capacity flow assumption used in the Energy Commission Summer Supply and Demand Outlook reports since 2006 and in the CPUC’s LTPP decision D.07-12-052 is clearly not correct.” The second conclusion was “Between 100 MW to 1,100 MW North to South appears to be a reasonable range of power flow values when PG&E 3-Day average temperatures exceed 99 degrees.”<sup>11</sup> The combination of the new CEC demand forecast and the new Path 26 power flow assumptions reduce PG&E’s authorized need.<sup>12</sup> These factors demonstrate that PG&E’s need was overstated in D. 07-12-052. If PG&E wishes to procure more MW than authorized they should be required by the Commission to demonstrate a need that justifies the additional projects.

If PG&E believes project delays will threaten reliability they should be required to

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<sup>9</sup> <http://www.energy.ca.gov/2009publications/CEC-200-2009-012/CEC-200-2009-012-SF.PDF> page 35.

<sup>10</sup> <http://www.energy.ca.gov/2010publications/CEC-200-2010-001/CEC-200-2010-001-D.PDF>  
INCREMENTAL IMPACTS OF ENERGY EFFICIENCY POLICY INITIATIVES RELATIVE TO THE 2009 INTEGRATED ENERGY POLICY REPORT ADOPTED DEMAND FORECAST January 2010 page 2

<sup>11</sup> <http://www.energy.ca.gov/2008publications/CEC-200-2008-006/CEC-200-2008-006.PDF> page 1,2

<sup>12</sup> Reply Testimony of Robert Sarvey on behalf of CARE page







Currently under the DWR contract the Tracy Peaker Project runs less than 100 hours per year. The ratepayers paid \$132/kw-yr as a capacity payment in 2009<sup>19</sup> for very little generation. From a ratepayer perspective the upgrade should provide better value than the existing project.

According to PG&E the project will also build a 200 acre solar farm at a site next to the project which would produce 35-40 MW of solar power which will be integrated with the proposed combined cycle upgrade.<sup>20</sup> Of all the projects PG&E selected from the 2008 RFO the Tracy Upgrade is the most compatible project with the States goal of 33% renewable generation by 2020. The thermal solar component also provides a better heat rate and better start times for the project, as a solar preheater.

**C. Do The GWF and Calpine Transactions Need To Be Approved As A Whole Or Can Specific Contracts Be Approved Separately?**

The novated contracts should not be approved or disapproved by the Commission as discussed above. The Commission should rule on the remaining requests, but not on the novated contracts. The contracts must be just and reasonable as determined under Section 451 of the Public Utilities Code. The Calpine transition agreement is dependent on the approval of the Calpine Upgrade. The Calpine LECEF Upgrade went through the RFO process so the Commission if it so decides may approve it separate from the other contracts.

**D. Should Approval Of The Tracy and LECEF Upgrade PPAs Be Contingent On The Failure Of Another Project Already Approved By The Commission Or Which May Be Approved By The Commission In A.09-09-021?**

The approval of the Tracy and LECEF Upgrades should not be contingent on failure of another project. If another project fails then PG&E should request additional MW during the 2010 LTTP just as they did in the 2008 LTTP. At that time the Commission can reassess PG&E's service territory needs and if additional MW are warranted to meet PG&E's need then the commission can grant that additional authority

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<sup>19</sup>[http://www.cers.water.ca.gov/pdf\\_files/power\\_contracts/gwf/082202\\_gwf\\_amended\\_ppa.pdf](http://www.cers.water.ca.gov/pdf_files/power_contracts/gwf/082202_gwf_amended_ppa.pdf) Exhibit A page 20

<sup>20</sup> PG&E application for approval of the GWF Novation page 16

for cancelled projects in that proceeding. Allowing a contingent approval or any other method of procurement outside the LTTP proceeding only creates chaos in the market and gives PG&E and the other utilities the green light to continue to attempt to procure projects outside the LTTP just as they did with the recent Tesla Project. As stated before the Tracy and LECEF Upgrades should be consolidated with the other projects in A. 09-09-021 and the winners selected with viability being a key factor.

The LECEF contract should not be approved as discussed above. It does not meet the need for load-following power plants needed to complement the renewable resources of wind and solar which provide power at indeterminate times. The LECEF should be left to independent power generators to sell the electricity produced to utilities or private customers who need electricity generated with that particular load profile.

**E. Other Considerations Regarding Approval Or Rejection Of The GWF And Calpine Transactions**

On December 31, 2009 CAL-ISO issued a report called, “2012-2014 Local Capacity Technical Analysis.” The report concludes that, “Due to the use of the Metcalf 500 kV capacitors and especially due to the numerous new transmission projects and new power plants the LCR needs based on reactive margin, a non-linear function, have decreased by about 800 MW from previous long-term studies.” In 2014 the study predicts that Maximum Qualifying capacity for the greater Bay Area would be 7,341 MW and the total MW Requirement would be 4,438 MW. The Bay Area load center has 6,704 MW<sup>21</sup> available so additional generation is not needed in the Bay Area for Local Resource Adequacy according to the study. The report identified the Stockton area as an area in need of more generation for local resource adequacy.<sup>22</sup> The GWF Tracy Upgrade would provide local resource capacity in the Stockton load center.

The Commission should adopt the lower estimate of the need adopted in D.07-12-052 for PG&E, 800 MW, because the local economy has slowed considerably since that forecast was made. On April 1, 2009, PG&E filed Application No. 09-04-001 requesting approval of a PPA with Mariposa Energy, LLC (Mariposa). Mariposa is a

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<sup>21</sup> <http://www.caiso.com/2495/2495c63b23450.pdf> page 2,3

<sup>22</sup> *Ibid.*

nominal 184 MW project. PG&E, in a binding settlement with CARE and the other parties in A09-04-001, agreed to file a second application for approval of other agreements arising from the LTRFO to meet a total need of no more than 1,512 MW, inclusive of the Mariposa PPA (184 MW). The second application was to be limited to 1,328 MW. (Mariposa Settlement Agreement) Also, PG&E's request violates the settlement agreement negotiated in good faith in A09-04-001 which limited PG&E's procurement in the LTPP to 1,512 MW.

The second application in A09-09-021 was filed on September 29, 2009. In that application PG&E is seeking approval of two agreements that would provide 1,305 megawatts (MW) of natural gas generation the Oakley project and the Marsh landing Project. The total MW of the three new power plants PG&E is seeking authorization for is 1499 MW.

In A.09-10-022, PG&E is seeking another 145 MW of new power generation which would bring PG&E's total request for procurement in the LTPP to 1,644 MW. The Commission has authorized PG&E to procure no more than 1,535 MW so the request for the Tracy upgrade is in excess of what the CPUC has authorized PG&E to procure.

PG&E is also requesting Commission approval of another 109 MW of unauthorized procurement in the upgrade of the Los Esteros Project in A-09-10-034.

#### **IV. CONCLUSION**

The Commission should approve no more than 1,112 MW of electric power from the requests proposed by PG&E in A.09-04-001, A.09-09-021, A.09-10-022, and A.09-10-034. The LECEF, the Calpine 2 proposal, should not be approved.

The contracts approved should consider the power plant locations for the purpose of minimizing environmental emissions to regions that currently have adequate electric generation capacity for that area's forecast electric load.

The upgrades are not necessary for reliability in the Greater Bay Area unless PG&E can demonstrate a reliability need in the Bay Area for 2012, for which PG&E has not made that showing here. The GWF and LECEF Upgrades are more viable than the other projects that PG&E has selected in the LTRFO and should be considered with the

other projects in A.09-09-021. PG&E should not be allowed to re litigate its need in D. 07-12-052. If other projects selected previously fail then PG&E should request additional approval for these failed projects in the 2010 LTTP. There is a lot of evidence from recent studies conducted by the CEC that PG&E's need has decreased not increased. The commission must put a stop to the never ending request for additional MW that have not been authorized in the LTTP.

Respectfully submitted,



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January 29, 2010

\* All sections containing redacted confidential information are provided under seal by Robert Sarvey to other persons who have signed an NDA for these proceedings.<sup>23</sup>

cc.  
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<sup>23</sup> Robert Sarvey CARE's witness signed a Nondisclosure Agreement (NDA) with PG&E.

### **Verification**

I am an officer of the Intervening Corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except matters, which are therein stated on information and 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.

Executed on this 29<sup>th</sup> day of January, 2010, at San Francisco, California.



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Lynne Brown Vice-President  
CALifornians for Renewable Energy, Inc.  
(CARE)

### **Certificate of Service**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure,

I have this day served a true copy of "*CARE's Opening Brief*" under CPUC Docket A.09-10-022 and A.09-10-034 on all parties identified on the attached service list. Service was effected by one or more means indicated below:

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

Executed this 29<sup>th</sup> day of January, 2010, at San Francisco, California.



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