

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking on the Commission's own motion to consider alternative-fueled vehicle tariffs, infrastructure and policies to support California's greenhouse gas emissions reduction goals.

Rulemaking 09-08-009  
(Filed August 20, 2009)

**OPENING BRIEF  
OF THE DIVISION OF RATEPAYER ADVOCATES**

LISA-MARIE SALVACION  
Attorney for the Division of Ratepayer Advocates  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Tel: (415) 703-2069  
E-mail: [lms@cpuc.ca.gov](mailto:lms@cpuc.ca.gov)

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**I. INTRODUCTION**

Pursuant to the December 29, 2009 Assigned Commissioner Scoping Memo (Scoping Memo), the Division of Ratepayer Advocates (DRA) hereby submits this Opening Brief in Phase One of this Rulemaking (R.) 09-08-009. The Ruling requested parties to submit a legal and policy analysis with regard to third-party electric service providers that supply fuel charging for electric vehicles (EV). Specifically, the Scoping Memo asks whether such entities are electrical corporations and public utilities under California Public Utilities Code §§ 216 and 218.<sup>1</sup> If the Commission concludes that sales by those providers—other than those currently regulated as public utilities—fall outside its jurisdiction, the proceeding must also determine the exact boundaries of the Commission's regulatory authority.<sup>2</sup>

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<sup>1</sup> According to the Scoping Memo, pp. 3-4, third-party electric charging providers could include, but not be limited to, owners of stand-alone electric vehicle charging spots that sell a single type of transportation fuel, electric recharging; owners of shared station arrangement where several types of transportation fuels, including electric recharging, are sold; residential and commercial landlords that provide electric vehicle charging as a service on the premises to tenants, guests of the tenants, customers of the tenants, and perhaps others; condominium associations that provide electric vehicle charging on the premises as a service to the condominium owners, their guests, and others; employers that provide access to recharging facilities as a service to their employees; and potentially others.

<sup>2</sup> Scoping Memo, p. 4.

In comments filed October 5, 2009, several parties indicated third-party electric charging providers should be regulated entities under Public Utilities Code §§ 216 and 218.<sup>3</sup> However, the Scoping Memo makes a preliminary interpretation that facilities solely used to provide electricity as a transportation fuel do not constitute “electric plant,” and therefore are not public utilities pursuant to § 216, unless an entity falls under §§ 216 and 218 for other reasons.<sup>4</sup> In making this conclusion, the Scoping Memo adopts the rationale applied in Decision (D.) 91-07-018, concerning the operation of facilities for the sale of compressed natural gas (CNG) for transportation fuel.

In this reply brief, DRA discusses the following issues:

- (A) Are third-party electric charging stations subject to regulation by the Commission pursuant to §§ 216 and 218 of the Public Utilities Code? If so, what is the extent of their regulation?
- (B) Are other third-party electric charging stations under private ownership subject to regulation under §§ 216 and 218? If so, what is the extent of their regulation?

DRA concludes that while some of these third-party electric charging stations do qualify as public utilities subject to the laws, regulations, and rules of the Commission, the Commission should exercise “light-handed” jurisdiction, so not to impede entry into the market. DRA proposes the Commission not regulate rates and costs for third-party retail establishments, but should still retain certain “light-handed” regulatory authority over some areas with regard to safety, reliability, environmental concerns, and to the extent that regulation may be required to achieve vital policy objectives. Privately owned electric charging stations limited to the person or corporations’ own use, or the use of its tenants, would not be considered “public utilities” under the Public Utilities Code.

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<sup>3</sup> See PG&E Comments, p. 13; SCE Comments, p. 22; SMUD Comments, p. 8 (also concluding SMUD has exclusive jurisdiction over electric charging service providers within its service territory); Environmental Coalition Comments, pp. 33-34.

<sup>4</sup> Scoping Memo, p. 5.

## II. DISCUSSION

### A. Is a Third-Party Electric Charging Station subject to regulation by the Commission pursuant to Public Utilities Code §§ 216 and 218?

Under the Public Utilities Code, an electric corporation is a public utility subject to the jurisdiction, control, and regulation of the Commission.<sup>5</sup> An “electrical corporation” includes every corporation or person owning, controlling, operating, or managing any electric plant for compensation within this state.<sup>6</sup>

Section 217 defines “electric plant” to include:

real estate, fixtures and personal property owned, controlled, operated or managed in connection with or to facilitate the production, generation, transmission, delivery or furnishing of electricity for light, heat, or power, and all conduits, ducts or other devices, materials, apparatus, or property for containing, holding, or carrying conductors used or to be used for the transmission of electricity for light, heat, or power.<sup>7</sup>

In addition, as discussed below, public dedication has been held as an implicit requirement to become a public utility. *Richfield Oil Corp. v. Public Utilities Com.*, (1960) 54 Cal. 2d 419, 428.

#### 1. Electric Charging Stations Under Private Ownership Are Not Electric Corporations Subject To Commission Regulation

Public Utilities Code § 218(a) excludes from the definition of “electrical corporation” any electrical plant “where electricity is generated on or distributed by the producer through private property solely for its own use or the use of its tenants and not for sale or transmission to others.”<sup>8</sup>

Private ownership and use is essential to exempt treatment. *Story v. Richardson* (1921) 186 Cal 162 (An electrical plant employed solely in a private enterprise does not

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<sup>5</sup> P.U. Code §§ 216 and 218. All code references shall be considered Public Utilities Code, unless specified otherwise.

<sup>6</sup> P.U. Code § 218.

<sup>7</sup> P.U. Code § 217.

<sup>8</sup> Section 218(b) also excludes from the definition of “electrical corporation” corporations or persons employing cogeneration technology or producing power from non-conventional power sources.

become a “public utility” under this statute by the sales of surplus energy to certain individuals). *Pajaro Valley Cold Storage Co. v. Public Utilities Com.* (1960) 54 Cal 2d 256 (There was no substantial evidence to sustain a finding that cold storage company was public utility where it appeared, among other things, that company was originally organized as co-operative with basic purpose to store apples of its members).

The Scoping Memo identifies several scenarios that would fall into this category of non-regulated electric vehicle charging providers, including: residential and commercial landlords that provide electric vehicle charging as a service on the premises to tenants, guests of the tenants (but not customers of the tenants); condominium associations that provide electric vehicle charging on the premises as a service to the condominium owners, their guests, and others; employers that provide access to recharging facilities as a service to their employees; and potentially others.<sup>2</sup>

Since most of the examples cited above are for private use or for use of tenants, the electric vehicle charging station would not qualify as an “electrical corporation” under Public Utilities Code § 218(a). Accordingly, these entities are not subject to the laws, rules, and regulation of the Commission. However, privately operated electric charging stations still would need to observe Electric Rule 18, which requires separate metering for individual residential dwelling units and individual nonresidential premises or space, except in limited situations.<sup>10</sup>

## **2. “Electric Plant” Requirement in Retail Electric Vehicle Charging Stations**

For third-party *retail* electric vehicle charging stations that do not qualify for a section 218(a) exemption, it must be determined whether “electric plant” exists for it to be considered an “electrical corporation” under the Public Utilities Code. The Scoping

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<sup>2</sup> Scoping Memo, pp. 3-4.

<sup>10</sup> See Electric Rule 18, which requires separate metering for individual units except where electricity is furnished under a rate schedule that specifically provides for resale service, or when the cost of electricity is absorbed in the rental and there is no separate identifiable charge to the tenants for electricity. Other exceptions apply.

Memo relies on D.91-07-018 to determine that third-party electric charging providers do not own, operate or manage an “electric plant.”<sup>11</sup>

In D.91-07-018, at issue was whether the CNG fuel pump service stations for natural gas vehicles (NGV) qualified as a “*gas plant*” under Public Utilities Code § 221. There, the Commission stated,

We believe it is expanding the meaning of words to an unnecessary degree to equate the word “power” in Section 221 to include CNG which is sold in a manner similar to the retail sale of gasoline for vehicles. After all, we do not believe anyone would seriously contend that a gas station operator is a “pipeline corporation” subject to our jurisdiction merely because he has pipes in his station which deliver “fluid substances except water through pipe lines.”<sup>12</sup>

As a result, the Commission concluded its jurisdiction on CNG sales is limited to a load-serving entity’s (LSE) side of the meter and the connection to the service stations’ side of the meter.<sup>13</sup> The Commission also retained safety jurisdiction over these entities.<sup>14</sup>

While D.91-07-018 discusses a similar issue regarding the Commission’s authority over third-party service for alternative-fuel vehicles (AFV), the legal analysis in that decision cannot be relied on here due to different facts. First, ownership or operation of a facility that engages in the resale of CNG as a motor vehicle fuel is specifically exempt from public utility status under § 216(f) of the Public Utilities Code.<sup>15</sup> No such exemption exists for electric vehicle charging stations. And, for purposes of determining whether the facilities of third-party electric charging stations constitute “*electric plant*” under § 217 requires an entirely different legal analysis than D.91-07-018, which considered whether CNG fueling stations constitute “*gas plant*.” Decision 91-07-018 is also factually distinct from the instant case since third-party electric charging stations

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<sup>11</sup> Scoping Memo, p. 5.

<sup>12</sup> D.91-07-018, 1991, Cal. PUC LEXIS 509 (July 2, 1991).

<sup>13</sup> *Id.* at Conclusions of Law 18 and 19.

<sup>14</sup> REFERENCE?

<sup>15</sup> *See also*, Cal. Bus. & Prof. Code § 13404.

potentially can sell power produced on-site, whereas the CNG fuel stations are temporary repositories of natural gas, and are entirely dependent on the regulated utility for the transport or purchase of natural gas.

**a) Retail Electric Charging Stations with On-Site Generation Constitute “Electric Plant”**

Based on the plain meaning of Section 217, third-party electric charging stations generating and producing its own energy onsite (e.g., solar) with the intent to publicly sell electricity to EV owners own, manage or operate “real estate, fixtures and personal property...in connection with or to facilitate the production, generation, transmission, delivery or furnishing of electricity.” Electric charging stations that produce their own electricity on site for sale to EV owners clearly have an “electric plant.” Under this scenario, the Commission would be hard-pressed to determine an electric plant does not exist. Special considerations for electric charging stations with onsite generation may need to be further examined, such as safety and environmental concerns (i.e., use of back-up generation) to determine the extent of Commission regulation.

**b) Retail Electric Charging Stations That Resell Energy From an LSE Fall Under Commission Jurisdiction**

Third-party electric charging stations that are resellers of energy—those who purchase electricity from the load-serving entity (LSE) for resale to EV owners, also could fall under Commission jurisdiction. The definition of “electric plant” under Section 217 is broad, and does not necessitate that an electrical corporation actually produce or generate electricity on site. For an electric charging station that resells electricity purchased from an LSE, such entities would own, operate or manage facilities “in connection with or to facilitate” the *delivery* or *furnishing* of electricity under the meaning of Section 217.

Although the Scoping Memo applies an interpretation that electric charging stations are similar to gasoline fueling stations, D.91-07-018 cannot be relied on here. Without an express statutory exemption from regulations as CNG station operators enjoy, the plain meaning of Public Utilities Code § 217 must be applied. It is not a stretch to

interpret the meaning of “facilitate...the delivery or transmission of electricity” pertain to electric vehicle charging stations when their business operations do exactly that. Plug-in fuel stations require capital investment in real estate and special equipment (such as the Level 1 or Level 2 charging equipment) to deliver electricity from the LSE to the electric vehicle. The same can be said for battery swapping stations which operate to “deliver or furnish electricity” to the electric vehicle. Unlike fueling stations for CNG and gasoline, which often serves as a temporary repository for the fuel, electric stations require that electricity be extracted from the grid, which can pose specific concerns on grid reliability and safety that the Commission may need to address.

Moreover, in the utilities’ general rate case applications, the utilities routinely characterize most capital investments related to EV infrastructure as electric plant.<sup>16</sup> There is no reason why similar equipment used by third-party electric charging stations could not also be characterized as “electric plant” under the code.

### **3. Public Dedication Requirement**

Public Utilities Code § 216(c) also contains a public dedication requirement in defining whether an electrical corporation is a public utility:

When any person or corporation performs any service for, or delivers any commodity to, any person, private corporation...that in turn either directly or indirectly, mediately or immediately, performs that service for, or delivers that commodity to, the public or any portion thereof, that person or corporation is a public utility subject to the jurisdiction, control, and regulation of the commission and the provisions of this part.

Courts have interpreted § 216 as a necessary component for “public utility” status, whether the utility has dedicated its property to public use. The test for determining whether dedication has occurred is:

whether or not [a person has] held himself out, expressly or impliedly, as engaged in the business of supplying [a service or commodity] to the public as a class, not necessarily to all

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<sup>16</sup> See Prepared Testimony of PG&E (PG&E-7) in A.09-12-020, Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2011.

of the public, but to any limited portion of it, such portion, for example, as could be served by his system, as contradistinguished from his holding himself out as serving or ready to serve only particular individuals, either as [an] accommodation or for other reasons peculiar and particular to them.

*Van Hoosear v. Railroad Commission* (1920) 184 Cal. 553, 554. The test for whether public dedication has occurred is a factual issue, to be determined on a case-by-case basis. However, such dedication may be inferred from action and need not be explicit. *Greyhound Lines, Inc. v. Public Utilities Com.*, supra, 68 Cal.2d 406, 414, citing *Yucaipa Water Co. No. 1 v. Public Utilities Com.* (1960) 54 Cal.2d 823, 827.

Here, retail electric vehicle fueling stations that engage in the business of supplying electricity to the general public clearly meet the criteria of the public dedication test. The fact that the entire general public do not all own electric vehicles or that electric vehicles would be limited in number in the early market is irrelevant—the limited portion of the public that are early adopters of electric vehicles is sufficient to meet the public dedication requirement. In fact, in *Richfield Oil Corp. v. Public Util. Com.* (1960) 54 Cal.2d 419 at 431, the California Supreme Court held a “utility that has dedicated its property to public use is a public utility even though it may serve only one or a few customers.” See also, *Unocal California Pipeline Co. v. Frances M. Conway*, (1994) 23 Cal. App. 4th 331, 335. Thus, for any entity that charges for the sale of electricity, even to a single customer, is considered a public utility under the Public Utilities Code.

Based on the above, third-party retail electric charging stations that sell electricity for fueling EVs are, in fact, suppliers and sellers of energy that own, manage, or control and “electrical plant” for purposes of being an “electrical corporation.” As an electrical corporation that “performs any service for, or delivers any commodity,” such entities are “public utilities,” and therefore subject to the laws, regulations and rules of the Commission.

## **B. Policy Considerations on Commission Regulation of Third-Party Electric Fueling Stations**

Just because third-party retail electric fueling stations fall under Commission jurisdiction does not mean the Commission should exercise its full authority over these entities. As a general policy, the Commission regulation of the thousands of electric vehicle service equipment (EVSE) services and charging stations by third-parties would be impractical, and should be limited so not to impede competition or entry into the market. Therefore, DRA does not believe that third-party power providers selling transportation fuel should be regulated for rates and costs, except, possibly, for such limited, “light-handed” regulation as may be required for overriding policy reasons, as described below.

DRA is very concerned about the potential of electric vehicle customers charging during on-peak periods. If the rates that third-party sellers charge are not regulated by the Commission, short of banning on-peak charging, how do we ensure that on-peak charging is strongly discouraged? Solutions do exist for this problem. For example, the Commission can require that relevant language be included in the contracts between the LSE and third-party charging equipment owner to set a high floor for on-peak prices charged to the PEV customers. DRA recommends that this issue be addressed in workshops and/or through working groups and a solution be developed for the Commission’s consideration. Such a solution should include a definition of “peak period” and a peak period floor price that all third-party charging stations would have to pass on to customers.

In addition, some light regulation related to terms and conditions, safety, as well as impact on the grid, should be utilized. The Commission did retain some safety jurisdiction for CNG service stations in D.91-07-018. The Commission should also ensure that the generation units located in the electric vehicle service stations does not contradict the Commission’s environmental policies, e.g., whether fueling stations should be prohibited from using fossil-fueled back-up generation sources. Some of the regulation such as building codes are not the Commission’s responsibility and should be

enforced through other appropriate agencies. The details of regulations can be developed in workshops and/or through working groups.

### III. CONCLUSION

The Commission has no authority to regulate privately owned electric vehicle charging stations that do not resell electric energy. Retail third-party electric vehicle charging stations are “electrical corporations” and therefore “public utilities” subject to the laws, regulations and rules of the Commission, but the Commission should design rules so as not to impede competition and entry into the market. The Commission should schedule additional workshops or working groups to address the extent of its regulation over third-party electric vehicle charging stations, consistent with the discussion above.

Respectfully submitted,

/s/ LISA-MARIE SALVACION

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Lisa-Marie Salvacion  
Staff Counsel

Attorney for the Division of Ratepayer  
Advocates

California Public Utilities Commission  
505 Van Ness Ave.  
San Francisco, CA 94102  
Phone: (415) 703-2069  
FAX: (415) 703-2262

February 8, 2010

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of “**OPENING BRIEF OF THE DIVISION OF RATEPAYER ADVOCATES**” to the official service list in **R.09-08-009** by using the following service:

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/s/ ROSCELLA V. GONZALEZ

Roscella V. Gonzalez

**SERVICE LIST**  
**R.09-08-009**

fdms@electradrive.net  
pierojd@udel.edu  
angie\_doan@plugsmart.net  
kevin.webber@tema.toyota.com  
mark.aubry@sev-us.com  
cread@ecotality.com  
spatrick@sempra.com  
npedersen@hanmor.com  
david.patterson@na.mitsubishi-  
motors.com  
helsel@avinc.com  
Janet.Combs@sce.com  
Bob@EV-ChargeAmerica.com  
liddell@energyattorney.com  
kwalsh@fiskerautomotive.com  
ek@a-klaw.com  
rpopple@teslamotors.com  
lms@cpuc.ca.gov  
Yulee@theICCT.org  
nsuetake@turn.org  
SSchedler@foe.org  
jay@pluginamerica.org  
ssmyers@att.net  
cjh5@pge.com  
Ann.Bordetsky@betterplace.com  
Jason.Wolf@betterplace.com  
epetrill@epri.com  
jody\_london\_consulting@earthlink.net  
jharris@volkerlaw.com  
svolker@volkerlaw.com  
jwiedman@keyesandfox.com  
gmorris@emf.net  
richard.lowenthal@coulombtech.com  
pskinner@svlg.net  
shears@ceert.org  
toconnor@edf.org  
wwester@smud.org  
aconway@dmv.ca.gov  
Bob@EV-ChargeAmerica.com  
kleacock@dmcgreen.com  
krose@dmv.ca.gov  
mschreim@core.com  
roberto.bocca@weforum.org  
hugh.mcdermott@betterplace.com  
than.aung@ladwp.com  
GO'Neill@energy.state.ca.us  
colleenquin@gmail.com  
AYergin@gridpoint.com  
martin.liptrot@ge.com  
jung.zoltan@epa.gov  
jviera@ford.com  
hillary.dayton@fluor.com  
Douglas.Marx@PacifiCorp.com  
kmorrow@etecevs.com  
Adrene.Briones@ladwp.com  
Leila.Barker@ladwp.com  
Marcelo.DiPaolo@ladwp.com  
Oscar.Alvarez@ladwp.com  
Priscila.Castillo@ladwp.com  
Scott.Biasco@ladwp.com  
david.eaglefan@gmail.com  
leilani.johnson@ladwp.com  
jellman@winnr.com  
tatsuaki.yokoyama@tema.toyota.com  
dsiry@codaautomotive.com  
bock@avinc.com  
dickinson@avin.com  
klynch@cityofpasadena.net  
cjuennen@ci.glendale.us  
dave.barthmuss@gm.com  
ffletcher@ci.burbank.ca.us  
flangit@ci.azusa.ca.us  
andrea.moreno@sce.com  
case.admin@sce.com  
Case.Admin@sce.com  
mpsweeney@earthlink.net  
ygross@sempra.com  
julian.durand@qualcomm.com  
vsmith@qualcomm.com  
dniehaus@semprautilities.com  
mike.ferry@energycenter.org  
sephra.ninow@energycenter.org  
siobhan.foley@energycneter.org  
sbadgett@riversideca.gov  
jlehman@anaheim.net  
coutwater@libertyplugins.com  
trae@kpcb.com  
lburrows@vpvp.com  
diarmuid@teslamotors.com  
mdjoseph@adamsbroadwell.com  
edwin.lee@sfgov.com  
johanna.partin@sfgov.com

dfugere@foe.org  
eric@ethree.com  
jheibult@nrdc.org  
smui@nrdc.org  
BWT4@pge.com  
ELL5@pge.com  
filings@a-klaw.com  
tjl@a-klaw.com  
bcragg@gmssr.com  
cassandra.sweet@dowjones.com  
jguzman@nossaman.com  
mgo@goodinmacbride.com  
mmattes@nossaman.com  
bobgex@dwt.com  
cem@newsdata.com  
axtw@pge.com  
regrelcpuccases@pge.com  
l1hg@pge.com  
SAZ1@pge.com  
sfr2@pge.com  
aaron.singer@bmw.com  
saluja@capricornllc.com  
a.vogel@sap.com  
Sven.Thesen@betterplace.com  
xingxin.liu@sap.com  
Sean.Beatty@mirant.com  
dietrichlaw2@earthlink.net  
Karin.Corfee@kema.com  
michael.schmitz@iclei.org  
mrw@mrwassoc.com  
kfox@keyesandfox.com  
jhall@calstart.org  
philm@scdenergy.com  
sfsarris@greenfuseenergy.com  
dgrandy@caonsitegen.com  
jamie@jknappcommunications.com  
jme@pge.com  
bdicapo@caiso.com

e-recipient@caiso.com  
cchilder@arb.ca.gov  
ekeddie@arb.ca.gov  
marcreheis@wspa.org  
dmodisette@cmua.org  
EGrizard@deweysquare.com  
gina@wspa.org  
jluckhardt@downeybrand.com  
Julee@ppallc.com  
Ralph.Moran@bp.com  
lmh@eslawfirm.com  
abb@eslawfirm.com  
ttutt@smud.org  
atrowbridge@daycartermurphy.com  
sas@a-klaw.com  
kyle.l.davis@pacificorp.com  
californiadockets@pacificorp.com  
michelle.mishoe@pacificorp.com  
carmine.marcello@hydroone.com  
ahl@cpuc.ca.gov  
agc@cpuc.ca.gov  
clu@cpuc.ca.gov  
crv@cpuc.ca.gov  
eks@cpuc.ca.gov  
fxg@cpuc.ca.gov  
fcc@cpuc.ca.gov  
gtd@cpuc.ca.gov  
jw2@cpuc.ca.gov  
lau@cpuc.ca.gov  
mc4@cpuc.ca.gov  
mwt@cpuc.ca.gov  
mc3@cpuc.ca.gov  
ska@cpuc.ca.gov  
pva@cpuc.ca.gov  
rmd@cpuc.ca.gov  
smk@cpuc.ca.gov  
scr@cpuc.ca.gov