



FILED

03-07-11
04:59 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue
Implementation and Administration of
California Renewables Portfolio Standard
Program.

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

**BRIEF OF THE CALIFORNIA FARM BUREAU FEDERATION ON IMPLEMENTATION
OF SENATE BILL 32**

KAREN NORENE MILLS
Attorney for
California Farm Bureau Federation
2300 River Plaza Dr.
Sacramento, CA 95833
Telephone: (916) 561-5655
Facsimile: (916) 561-5691
E-Mail: kmills@cfbf.com

March 7, 2011

BRIEF OF THE CALIFORNIA FARM BUREAU FEDERATION ON IMPLEMENTATION OF SENATE BILL 32

I. INTRODUCTION

In accordance with the Administrative Law Judge's Ruling Setting Schedule for Briefs on Implementation of Senate Bill 32 dated January 27, 2011 (Ruling) the California Farm Bureau Federation (Farm Bureau)¹ submits its brief. The ALJ Ruling originally established March 4, 2011, as the due date for the briefs, but was later extended to March 7 by the ALJ's Ruling dated February 17. Farm Bureau appreciates the opportunity the Commission has presented in setting the stage for continued discussion about renewable distributed generation. Several of the issues to be addressed have arisen in other CPUC dockets. As this matter progresses, it is important to recognize the value to stakeholders that consistent treatment of issues will have.

As directed by the Ruling Farm Bureau addresses the issues that have been presented for consideration, noting where appropriate which issues have not been addressed. In framing its discussion of the delineated issues, Farm Bureau's focus is on systems that are 1 MW and smaller. Initially, however, Farm Bureau sets out some overarching policy perspectives about the implementation of SB 32 as a tool for the support of renewable distributed generation in the state.

¹ The California Farm Bureau Federation is California's largest farm organization with more than 76,500 agricultural and associate members in 53 county Farm Bureaus. California farmers and ranchers sell \$24.8 billion in agricultural products annually, accounting for 9 percent of the gross state product, and hundreds of thousands of jobs in California.

II. THE IMPLEMENTATION OF SB 32 AFFORDS THE CPUC A TIMELY OPPORTUNITY TO CREATE VIABLE PATHWAYS FOR THE SUPPORT OF DISTRIBUTED GENERATION

There can be no argument that a significant number of programs, tariffs, rules and proceedings are in place to encourage development of renewable distributed generation. High expectations were attached to the enactment of the feed-in-tariffs or FITs. (D.07-07-027). It was anticipated that standardized tariffs and contracts for the purchase of customer-owned generation would limit negotiations and delays in connecting the equipment. The FITs also opened up opportunities for all forms of renewable generation, unlike net metering statutes which are technology specific. Agricultural customers continue to advance efforts for self-generation beyond solar, such as bioenergy and irrigation-related hydroelectric. The Department of Agriculture's recently published 2009 On-Farm Renewable Production Survey, February 2011, highlights the breadth of interest by agriculture in California and other states in renewable generation. (http://www.agcensus.usda.gov/Publications/2007/Online_Highlights/On-Farm_Energy_Production/energy09.pdf).

As the FIT program has evolved, impediments to its operation as a workable model have become increasingly apparent. The CPUC's implementation of SB 32 provides an opportunity to further facilitate the substantial opportunities for renewable distributed generation that exist in this state.

There is strong support for furthering opportunities for distributed generation beyond just the solar energy reflected in the CSI program. As the regulator of the major utilities in the state, the CPUC is vested with the role of ensuring that the clear support for a policy of advancing renewable distributed generation will result in the generation actually being operational and connected. Farm Bureau is supportive of an increased focus on distributed generation as a tool to reduce the reliance on large-scale renewable projects. Increasing mandates for renewable generation in the utilities' portfolios have increased pressures on agricultural land resources as a venue for location of both generation and transmission necessary to meet the mandates. By looking to a variety of sources to meet the goals encompassed by an RPS, some pressure on these important land resources can be diffused. As Governor Brown has articulated such localized energy can be located close to where energy is consumed, can be constructed relatively quickly, without new transmission lines and even perhaps without environmental impact. (<http://jerrybrown.org/jobs-california's-future>) Currently, the opportunities to pursue renewable distributed generation technologies other than solar is not working for many.

Farm Bureau supported the implementation of the FIT when adopted, in part due to the apparent path to facilitate development of different types of customer generation without constant statutory revision. However, the complexity that developed in the FIT process since its inception has deterred many from pursuing opportunities. Stakeholders seek to emulate the solar and wind net metering statues for other sources of renewable generation, because

it's seen as a straight forward method of delivering customer generation and also one that provides for a level playing field between the customer-generator and the utility. Like the net metering statute, SB 32 has set-up parameters to assure a balance between the two parties. As the CPUC moves forward with implementation of SB 32 and other customer generation opportunities, new procedures will be required to ensure legitimate opportunities for customer generation materialize. Unless the procedures are clear for establishment of generation and there is ongoing support for resolving problems as they arise, customers will not invest in the opportunities. The agricultural community takes significant risks every day in its daily business operations, and does not need to embark on ventures with unpredictable outcomes for customer-generation.

As our position is explained in the following issue prompts, the focus is on systems with a capacity of 1 MW and below. That threshold represents the likely range of opportunities for facilities that will be connected at the customer level for our members and in many instances allows for less complex and lengthy processes for connection and operation under existing regulatory frameworks. Stream-lined approaches appropriate for facilities 1 MW and less may be just as useful for larger facilities.

III. IMPLEMENTATION ISSUES FOR SB 32

1. Customers and Eligibility.

It does not appear that it is necessary to segregate the tariffs between water/wastewater and other customers going forward, as a result of the changes that were made to Public Utilities Code section 399.20.

The FITs which arose out of D. 07-07-027 were implemented separately due to the specific statutory language directing development of tariffs for water and wastewater customers. The expanded availability of the basic contract was separate and distinct from the program to implement section 399.20. Therefore, the tariffs/standard contracts were also made separate and distinct. (D. 07-07-027, page 42.) Since the tariffs rely on underlying contracts for the implementation of the terms, any change at this stage to terms and conditions of the tariffs should not be accomplished in a way that affects existing agreements.

Farm Bureau strongly supports the continued option of the excess sales portion of the FITs. Nothing in the language adopted by SB 32 suggests any change to the offer of such an option is warranted.

2. Increase in size of eligible facility to three MW – no position currently.
3. Utility reporting requirements – no position currently.
4. Adjustment of program cap and allocation to 750 MW – no position currently.
5. Yearly Inspection and Maintenance Report.

Farm Bureau is not prepared at this time to offer specific guidance regarding what should be contained in any inspection and maintenance report. Most likely the details would vary with the type of technology that is used. It is important, however, that the CPUC adopt very specific guidance as to what is expected for compliance. Without such specificity

opportunities for disagreements between the generator and the utility could easily arise, creating unnecessary discord and likely delay in operations. Clearly, all parties have a strong interest in maintaining the safety and reliability of these systems.

6. New Contract Provisions.

Section 399.20(q) requires the CPUC to ensure the contract underlying the tariff contains provisions ensuring compliance with applicable laws. In its implementation of the original FITs, the CPUC authorized provisions that encompass similar concerns. For example, the PG&E Small Renewable Generator PPA contains the following provision:

5.3 Standard of Care. Seller shall: (a) maintain and operate the Facility and Interconnection Facilities, except facilities installed by PG&E, in conformance with all applicable laws and regulations and in accordance with Good Utility Practices, as defined by PG&E's Wholesale Distribution Tariff and the CAISO Tariff, as they may be amended, supplemented or replaced (in whole or in part) from time to time; (b) obtain any governmental authorizations and permits required for the construction and operation thereof; and (c) generate, schedule and perform transmission services in compliance with all applicable operating policies, criteria, rules, guidelines and tariffs and Good Utility Practices, as provided in clause (a) above. Seller shall reimburse PG&E for any and all losses, damages, claims, penalties, or liability PG&E incurs as a result of Seller's failure to obtain or maintain any governmental authorizations and permits required for construction and operation of the Facility throughout the Term of this Agreement.

Although, as addressed later in the brief, Farm Bureau disputed the reliance on interconnection requirements other than Rule 21, based on

current information the portion of the paragraph regarding compliance with existing laws appears to be consistent with the current provisions.

7. Utility discretion to deny tariff, subject to appeal to the Commission.

It is the parameters for an appeal of a dispute between the parties, which may be the more important of the two sections addressed by the issue topic. Section 399.20 (n) sets out the basis for utility denials to a tariff request that may give rise to an appeal. In some instances they are repetitive of other provisions contained in the statute that establish minimum requirements for the ability of the project to proceed. As with other provisions of the statute, which suggest technical requirements, we do not offer recommendations on the requirements themselves. It is important that a process and the requirements themselves be as specific as possible, otherwise disputes will easily arise and the CPUC's adjudicatory role may be called into play.

The CPUC currently has effective structures in place to facilitate an expedited appeal process. Any appeal process established for purposes of section 399.20(o) should be one that is workable for resolving other disputes that arise in the context of reaching agreement on the details necessary to make the generation operational. This provision addresses denial of a tariff request, but as detailed later in our comments, an appeal should be available for delays and demands that may not be strictly characterized as denials, but so significantly undermine the ability to make a system operational a resolution is needed. Rule 21 actually provides for

a resolution process that can be updated and used for this program. As set forth in PG&E's Electric Rule 21 G:

DISPUTE RESOLUTION PROCESS

The following procedures will apply for disputes arising from this Rule:

1. The Commission shall have initial jurisdiction to interpret, add, delete or modify any provision of this Rule or of any agreements entered into between PG&E and the Producer to implement this tariff ("The Implementing Agreements") and to resolve disputes regarding PG&E's performance of its obligations under its tariffs, the applicable agreements, and requirements related to the Interconnection of the Producer's Generating or Interconnection Facilities pursuant to this Rule.

2. Any dispute arising between PG&E and the Producer (individually "Party" and collectively "the Parties") regarding PG&E's or Producer's performance of its obligations under its tariffs, The Implementing Agreements, and requirements related to the Interconnection of Producer's Facilities pursuant to this Rule shall be resolved according to the following procedures:

a. The dispute shall be reduced to writing by the aggrieved Party in a letter ("the dispute letter") to the other Party containing the relevant known facts pertaining to the dispute, the specific dispute and the relief sought, and express notice by the aggrieved Party that it is invoking the procedures under Section G.2. Upon the aggrieved Party notifying the other Party of the dispute, each Party must designate a representative with the authority to make decisions for its respective Party and a representative with the technical expertise for its respective Party to review the dispute within 7 calendar days. In addition, upon receipt of the dispute letter, PG&E shall provide the aggrieved Party all the relevant regulatory and/or technical detail regarding any PG&E interconnection requirements under dispute within 21 calendar days. Within 45 calendar days of the date of the dispute letter, the Parties' authorized representatives will be required to meet and confer to try to resolve the dispute.

b. If a resolution is not reached within 45 calendar days from the date of the dispute letter, either Party may request

to: (1) continue negotiations for an additional 45 days or (2) make a written request to the Chief Administrative Law Judge of the Commission for mediation. Alternatively, both Parties by mutual agreement may request mediation from an outside third-party mediator with costs to be shared equally between the Parties.

c. If the Parties do not resolve their dispute within 90 calendar days after the date of the dispute letter, *either Party may file a Formal Complaint before (added) the* Commission pursuant to the Commission's Rules of Practice and Procedure Applicable to Customer Complaints.

3. Pending resolution of any dispute under this Section, the Parties shall proceed diligently with the performance of their respective obligations under this Rule and The Implementing Agreements, unless The Implementing Agreements have been terminated. Disputes as to the application and implementation of this Section shall be subject to resolution pursuant to the procedures set forth in this Section.

The provision establishes a working benchmark to develop an appeal process for the purposes of this statute. Because of the importance of working through disputes quickly, the dates and direction provided for under the Rule 21 dispute resolution should be considered for adoption in this context as well. With the refinement of the CPUC's ADR Program in recent years, it too provides a viable avenue for resolution of disputes. It may be appropriate to dedicate a subset of the existing CPUC ADR Program to resolving the types of disputes that are within the CPUC's oversight for implementation of generation. In this instance the request would be made to the ADR Coordinator, rather than the Chief ALJ as currently framed under Rule 21. If such efforts fail and a complaint proceeding is instituted, it would be important to provide for expedited treatment of such complaints to avoid costly delays.

8. Contract termination provisions – no position currently.
9. Performance Standards to be Established by the Commission.

The language giving rise to this issue requires standards for facilities greater than 1 MW. The demarcation between sizes of facilities is one of several instances that support a more simplified approach for 1 MW facilities than is applicable to other facilities. Complexities attendant to operations have necessarily increased as the size of permissible facilities have increased. As the parameters for establishment of rules relating to installation and operation of projects are considered, the CPUC should recognize the differing impacts smaller scale facilities have on the system, as the Legislature did in this statute. Recently in D.10-12-055, the CPUC recognized the importance and opportunities associated with smaller systems by directing the parties to develop a simplified approach for small-scale combined heat and power facilities:

Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company must negotiate with the parties to develop a simplified contract for less than 500 kilowatt hour systems; if desired, Energy Division will host a workshop to establish guiding principles. (D. 10-12-055 Ordering Paragraph 13, page 42.)

The agricultural community is poised to embrace a variety of distributed renewable generation options, but even the complexities of the current FITs as they have been implemented have acted as a significant deterrent in some instances to pursuing and investing time and resources into projects. This proceeding and the language of the statute provide a

key opportunity for the CPUC to achieve a more tailored approach to smaller facilities.

10. Setting the Price.

- a. The price directive contained in the statute is quite specific.

SB 32 goes beyond the provisions of the current FITs, as in addition to the pricing directive which was previously contained in statute, current and anticipated environmental compliance costs are delineated. The statute is crafted to allow flexibility for inclusion of all appropriate costs referenced under the statute. Applicable costs will vary with the technology under consideration. At this stage of the development for the tariff, the CPUC should focus on development of a methodology for adoption of the costs to be included in the price.

- b. Relevance of FERC Orders.

As D. 10-12-055 (page 2) described:

The FERC orders clarified that under the Public Utility Regulatory Policies Act of 1978, 16 U.S.C. § 824a-3, the Commission could require California utilities to offer contracts at Commission-determined wholesale rates to eligible combined heat and power (CHP) systems which participate in the AB 1613 (Ch. 713, Stats. 2007) program, provided that the rates did not exceed the purchasing utilities' avoided costs and that the CHP systems had obtained Qualifying Facility status under the FERC's regulations.

Yet again, the 1 MW threshold for generation comes into play in navigating the interplay of the goals to integrate distributed

generation in California and the mandates associate with FERC directives. To stakeholders like Farm Bureau whose focus has been at the CPUC level and is not engaged in the FERC rules and its jurisdictional reach on a daily basis, the interplay between the CPUC and FERC rules is a challenge to track. FERC clearly directs that under its Order No. 732 it will not require facilities with net capacity of 1 MW or less to make a filing with FERC to claim QF status, although applicants for such facilities may seek certification if they wish to do so. When the application of net metering enters the equation, even the need for QF status is called into question. (See FERC Declaratory Order 129 FERC P 61,146) Because the current FITs allowed for a net metering model (excess sales options), they provide the CPUC with a similar framework for pricing.

c. Customer Indifference.

The indifference requirement established by section 399.20(d)(3) is similar to other directives to the CPUC to segregate non-participating customers from the effects of a program. For example the net metering statute (Public Utilities Code section 2827—(4)(B)) requires that the rate does not result in a shifting of costs between customer-generators and other bundled service customers. Presumably the utilities have established programs, systems and methodologies to track the differential between the

two. As with any revenue allocation determination, it is not a simple analysis and requires review of the benefits and costs associated with the tariff. That analysis cannot occur until the complete terms of the tariff are adopted. The analysis in this case is complicated by the fact that SB 32 removed the nexus between a retail customer and the operation of the electric generation facility for purposes of these tariffs.

11. Expedited Interconnection Procedures.

Of all the issues thought to slow the operational opportunities for distributed generation, it is the interconnection issue that has engendered much of the debate about ways to expedite facilities. The Re-DEC Workshop held on Friday, March 4 (which prompted the request for an extension for submission of these briefs) highlighted the extensive debate and effort that is underway to remedy the problems which have and currently exist regarding interconnection procedures under the existing FITs and other programs. It was clear from the Workshop there is a real need to find timely solutions to the varying interpretations about applicable procedures for interconnection. Although the language in SB 32 addressing expedited interconnection is specific to a facility that meets a certain profile, the CPUC should use this opportunity to remedy recognized shortcomings in existing procedures.

A number of reasons are cited for the lengthy delays and recurring studies currently associated with the interconnection process. Examples

of the frustrations associated with interconnection predate the current FITs, but the points of frustration do not seem to have improved or changed significantly. For example, in an article entitled DG Down on the Farm (<http://www.distributedenergy.com/september-october-2005/on-the-farm.aspx>) a dairy operator, who installed a digester, noted the unusual requirements produced by the utility to interconnect with the system and the apparently contradictory advice presented by the engineers. The source of the delays may vary, but the time delays all have significant economic consequences. A project proponent speaking at the December 14, 2010, California Energy Commission Bioenergy Action Plan Workshop relayed the ever-evolving estimates from the utility for the costs to interconnect. (See Workshop transcript pages 44-45.) That the delays continue to be reported, despite requests for connection and opportunities to develop protocols, demonstrates the real need for clear requirements and ways to resolve debates when the requirements are not as clear as initially anticipated.

When the FITs were implemented, Farm Bureau and Sustainable Conservation argued extensively that Rule 21 be used by all the utilities for the interconnection procedures. The CPUC authorized PG&E to utilize the FERC SGIP. Without the existence of a parallel universe, it is impossible to say no delays or disputes would have arisen under Rule 21, but as noted earlier in the brief Rule 21 does provide for an ADR process that can and should be utilized when disputes arise. A refined process at

the CPUC should be a part of any focus to improve interconnection requirements. In contrast the external arbitration provided for under the PG&E WDAT (section 9) requires referral to a three-member arbitration panel, an expensive undertaking for small system developers or operators.

Like the transactions described in the Proposed Decision of ALJ Duda in A.10-03-001, the transactions which will be governed by SB 32 will be connecting at the distribution level. Certainly, any 1 MW and below will be. “Because the commission retains jurisdiction over distribution facilities, Rule 21 will continue to govern interconnection of those facilities, even if the facilities are intended to be used to facilitate a wholesale transaction to the utility in the form of a new metering surplus.” (Pages 13-14). Only recently have utility efforts to refine their interconnection procedures been noticed to a broad range of stakeholders. Farm Bureau urges the CPUC to require for all systems subject to SB 32 and especially for those 1 MW and below that oversight of the process be clearly mandated by the CPUC procedures. Efforts to implicate CAISO and FERC procedures can unnecessarily complicate and distort the viability of small-scale generations.

12. Commission consideration of locational benefits – no position currently.

13. Refunds of incentives pursuant to the California Solar Initiative and the Self-Generation Incentive Program.

The purpose of the section addressing the interplay between the net metering program and new tariffs under a FIT model is to preclude customers from jumping back and forth between tariff options. As the parameters of new programs develop, however, there may be reasons to allow migration from previous opportunities to this program without punitive measures.

14. Other Matters.

The Ruling requests input on next steps to resolve the differences that are likely to arise over the interpretation of the issues presented by the implementation of SB 32. Farm Bureau supports workshops, when it is feasible to examine the issues in an efficient manner. It is unlikely complete reliance on workshops for the issues raised here would lead to agreement on the terms of any tariffs responsive to the legislation. Workshops may be useful as a preliminary step to help further a discussion about which issues have been sufficiently explored through initial briefing, which issues might be decided with further briefing and which issues can only be assessed through evidentiary hearings.

IV. CONCLUSION

Much is to be gained from establishing financial and operational directives appropriately for distributed generation. As important as the initial parameters are, stakeholders have learned over the past few years that concrete pathways

to resolve stalemates is just as important. Even as sophisticated project developers for distributed generation may need to be, they are no match for the level of resources the utilities have at their disposal. The wide-ranging support for a blend of renewable resources in California presents an opportunity to make small facilities operational without undue complexity or delay.

Dated: March 7, 2011

Respectfully submitted,

A handwritten signature in black ink that reads "Karen Norene Mills". The signature is written in a cursive, flowing style.

KAREN NORENE MILLS

VERIFICATION

I am Associate Counsel to the California Farm Bureau Federation and am authorized to make this verification on its behalf. The statements made on behalf of Farm Bureau in this Opening Brief are true of my own knowledge, except as to 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 March 14, 2011, at Sacramento, California.

A handwritten signature in black ink, reading "Karen Norene Mills". The signature is written in a cursive style with a horizontal line underneath the name.

KAREN NORENE MILLS

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 the BRIEF OF THE CALIFORNIA FARM BUREAU FEDERATION ON IMPLEMENTATION OF SENATE BILL 32 on all parties identified on the attached service list. Service was affected as appropriate by means indicated below:

- ✓ Transmitting the copies via facsimile, modem, or other electronic means (Via Electronic Means); and
- ✓ Placing the copies in properly addressed sealed envelopes and depositing such envelopes in the United States mail with first-class postage prepaid (Via First Class Mail).

Executed this 14th day of March 2011, at Sacramento, California.

/s/ - Pamela K. Hotz

PAMELA K .HOTZ
California Farm Bureau Federation
2300 River Plaza Drive
Sacramento, CA 95833

cadowney@cadowneylaw.com	CARRIE A.	DOWNEY	Imperial Irrigation District
chris.leveriza@glacialenergy.vi	CHRIS	LEVERIZA	Glacial Energy
ccasselman@pilotpowergroup.com	CINDY L.	CASSELMAN	Pilot Power Group, Inc.
douglass@energyattorney.com	DANIEL W.	DOUGLASS	Alliance for Retail Energy Markets/Direct Access/WWest
liddell@energyattorney.com	DONALD C.	LIDDELL	California Energy Storage Alliance/Walmart Stores, Inc. ai
klatt@energyattorney.com	GREGORY S.G.	KLATT	Alliance for Retail Energy Markets
jnelson@psrec.coop	JESSICA	NELSON	
jleslie@luce.com	JOHN W.	LESLIE, ESQ.	Shell Energy North America (US), L.P.
matthew@turn.org	MATTHEW	FREEDMAN	The Utility Reform Network
wplaxico@axiopower.com	WILL	PLAXICO	Axio Power, Inc.
AMSmith@SempraUtilities.com	AIMEE M.	SMITH	San Diego Gas and Electric Co.
dbodine@libertypowercorp.com	DEANNA	BODINE	Liberty Power Holdings, LLC
	JANICE G.	HAMRIN	CENTER FOR RESOURCE SOLUTIONS
	JOHN	NIMMONS	Recurrent Energy
jna@speakeasy.org	LAURA	WISLAND	Union of Concerned Scientists
lwisland@ucsusa.org	LAURIE	MAZER	BP Wind Energy North America, Inc.
Laurie.Mazer@bp.com	MARTIN	HOMEC	Californians for Renewable Energy/Redwood Renewables
martinhomcec@gmail.com	NANCY	RADER	California Wind Energy Association
nrader@calwea.org	PATRICK	VANBEEK	Commercial Energy of California
patrick.vanbeek@commercialenergynet	RANDALL W.	HARDY	Randall W. Hardy
rhardy@hardyenergy.com	TED	KO	Fit Coalition
ted@fitcoalition.com	DANIEL V.	GULINO	RIDGEWOOD POWER MANAGEMENT, LLC
dgulino@ridgewoodpower.com	RHONE	RESCH	
rresch@seia.org	KEITH	MCCREA	CA Manufacturers & Technology Assn./LS Power Associa
keith.mccrea@sablaw.com	JAMES P.	WHITE	Chinook Power Transmission, LLC/Zephyr Power Transm
jim_p_white@transcanada.com	JOHN	KERN	BlueStar Energy Services
jkern@bluestarenergy.com	MADELON A.	KUCHERA	BlueStar Energy Solutions
mkuchera@bluestarenergy.com			
	KEVIN	BOUDREAUX	
kb@enercalusa.com	JORDAN A.	WHITE	Enercal USA, LLC
jordan.white@pacifcorp.com	DAVID	SAUL	PacifiCorp
dsaul@pacificsolar.net	CAMILLE A.	GOULET	SOLEL, INC.
GouletCA@email.laccd.edu	KELLY	CAUVEL	Los Angeles Community College District
kelly.cauvel@build-laccd.org	LARRY	EISENBERG	Los Angeles Community College District
eisenbih@email.laccd.edu	RANDALL W.	KEEN	Los Angeles Community College District
rkeen@manatt.com	NORMAN A.	PEDERSEN	MANATT PHELPS & PHILLIPS, LLP
npedersen@hanmor.com	MICHAEL	MAZUR	Southern California Generation Coalition
mmazur@3PhasesRenewables.com			3 Phases Renewables

susan.munves@smgov.net	SUSAN	MUNVES	
ej_wright@oxy.com	ELIZABETH	WRIGHT	
pssed@adelphia.net	PAUL	DELANEY	American Utility Network
cathy.karlstad@sce.com	CATHY A.	KARLSTAD	Southern California Edison Company
mike.montoya@sce.com	MICHAEL D.	MONTOYA	Southern California Edison Company
rkmoore@scwater.com	RONALD	MOORE	
kswitzer@gswater.com			
cponds@ci.chula-vista.ca.us	CHERYL	PONDS	The City of Chula Vista
mary@solutionsforutilities.com	MICHAEL	MEACHAM	
DAKing@SempraGeneration.com	MARY C.	HOFFMAN	Solutions for Utilities, Inc.
fortlieb@sandiego.gov	DANIEL A.	KING	Sempra Generation
KHassan@SempraUtilities.com	FREDERICK M.	ORTLIEB	CITY OF SAN DIEGO
GBass@SempraSolutions.com	KIM F.	HASSAN	San Diego Gas & Electric
TRoberts@SempraUtilities.com	GREG	BASS	Sempra Energy Solutions LLC
CentralFiles@SempraUtilities.com	THEODORE E.	ROBERTS	Sempra Energy
marcie.milner@shell.com	MARCIE	MILNER	
GloriaB@anzaelectric.org	GLORIA	BRITTON	Anza Electric Cooperative
kerry.eden@ci.corona.ca.us	KERRY	EDEN	
phil@reesechambers.com	PHILLIP	REESE	The Califor PO BOX 8
Joe.Langenberg@gmail.com	JOSEPH	LANGENBERG	
dorth@krccd.org	DAVID	ORTH	
ek@a-klaw.com	EVELYN	KAHL	
bruce.foster@sce.com	BRUCE	FOSTER	
cec@cpuc.ca.gov	Christopher	Clay	DRA LEGAL DIVISION
nao@cpuc.ca.gov	Noel	Obiora	DRA LEGAL DIVISION
jeanne.sole@sfgov.org	JEANNE M.	SOLE	City and County of San Francisco
marcel@turn.org	MARCEL	HAWIGER	The Utility Reform Network
arno@recurrentenergy.com	ARNO	HARRIS	
CRMd@pge.com	CHARLES R.	MIDDLEKAUFF	Pacific Gas and Electric Company
ECL8@pge.com	EVELYN C.	LEE	PACIFIC GAS AND ELECTRIC COMPANY
nes@a-klaw.com	NORA	SHERIFF	First Solar, Energy Producers and Users Coalition.
abrowning@votesolar.org	ADAM	BROWNING	The Vote Solar Initiative
bcragg@goodinmacbride.com	BRIAN T.	CRAGG	Independent Energy Producers Association (IEPA)/Caithn
jsqueri@gmssr.com	JAMES D.	SQUERI	California Retailers Association
jarmstrong@goodinmacbride.com	JEANNE B.	ARMSTRONG	Solar Alliance

mday@goodinmacbride.com	MICHAEL	DAY	The Vote Solar Initiative/Recurrent Energy, Inc.
stevegreenwald@dwt.com	STEVEN F.	GREENWALD	Newberry Geothermal LLC
shong@goodinmacbride.com	SUZY	HONG	Terra-Gen Power, LLC
dhuard@manatt.com	DAVID L.	HUARD	MANATT, PHELPS & PHILLIPS, LLP
todd.edmister@bingham.com	TODD	EDMISTER	Stirling Energy Systems, Inc. (SES)
jkarp@winston.com	JOSEPH M.	KARP	California Wind Energy Assn./Abengoa Solar Inc./Austra Ir
edwardoneill@dwt.com	EDWARD W.	O'NEILL	California Large Energy Consumers Association
jeffgray@dwt.com	JEFFREY P.	GRAY	Calpine Power America-CA, llc
michael.hindus@pillsburylaw.com	MICHAEL S.	HINDUS	NextEra Energy Resources
ssmyers@att.net	SARA STECK	MYERS	Center for Energy Efficiency and Renewable Technologie:
gpetlin@3degreesinc.com	GABE	PETLIN	
mrfh2@pge.com	MARK	HUFFMAN	Pacific Gas and Electric Company
bill@fitcoalition.com	WILLIAM S.	KAMMERER	Fit Coalition
ralf1241a@cs.com	JOHN	DUTCHER	MOUNTAIN UTILITIES
wbooth@booth-law.com	WILLIAM H.	BOOTH	Ridgewood Renewable Power, LLC and Ridgewood Olind
kowalewskia@calpine.com	AVIS	KOWALEWSKI	CalpinePowerAmerica-CA,LLC
info@calseia.org	SUE	KATELEY	California Solar Energy Industries Association
rick_noger@praxair.com	RICK C.	NOGER	
jpross@sungevity.com	JP	ROSS	THE VOTE SOLAR INITIATIVE
jody_london_consulting@earthlink.net	JODY	LONDON	Sustainable Conservation and RCM International
kfox@keyesandfox.com	KEVIN T.	FOX	Silverado Power, LLC
gmorris@emf.net	GREGG	MORRIS	Green Power Institute
ndesnoo@ci.berkeley.ca.us	NEAL	DE SNOO	East Bay Power Authority/City of Berkeley
clyde.murley@comcast.net	CLYDE	MURLEY	The Community College league of California
tomb@crossborderenergy.com	R. THOMAS	BEACH	THE CALIFORNIA COGENERATION COUNCIL/Solar All
dweisz@marinenergyauthority.org	DAWN	WEISZ	Marin Energy Authority
anders.glader@elpower.com	ANDERS	GLADER	Element Power
janreid@coastecon.com	L. JAN	REID	L. Jan Reid
michaelboyd@sbglobal.net	MICHAEL E.	BOYD	CAifornians for Renewable Energy, Inc.
johnrredding@earthlink.net	JOHN R.	REDDING	Silicon Valley Manufacturers Group
jwei@aglet.org	JAMES	WEIL	Aglet Consumer Alliance
jsanders@caiso.com	JUDITH	SANDERS	
cmkehrein@ems-ca.com	CAROLYN	KEHREIN	Energy Users Forum
dgeis@dolphingroup.org	DAN	GEIS	Inland Empire Utilities Agency
dcarroll@downeybrand.com	DAN L.	CARROLL	Mountain Utilities
davidb@cwo.com	DAVID A.	BISCHEL	California Forestry Association

jmcfarland@treasurer.ca.gov	JAN	MCFARLAND	Americans for Solar Power
jim.metropulos@sierraclub.org	JIM	METROPULOS	Sierra Club California
blaising@braunlegal.com	SCOTT	BLAISING	City of Cerritos
sgp@eslawfirm.com	SAMANTHA G.	POTTENGER	Fortistar Methane Group
abb@eslawfirm.com	ANDREW B.	BROWN	Sierra Pacific Power Company/Constellation NewEnergy.
dkk@eslawfirm.com	DOUGLAS K.	KERNER	Fortistar Methane Group/Sierra Pacific Industries
lmh@eslawfirm.com	LYNN M.	HAUG	FuelCell Energy, Inc./Sierra Pacific Power
wwester@smud.org	WILLIAM W.	WESTERFIELD III	SACRAMENTO MUNICIPAL UTILITY DISTRICT
Christine@consciousventuresgroup.com	CHRISTINE	HENNING	Large-Scale Solar Association
kmills@cfbf.com	KAREN NORENE	MILLS	
jcoive@bpa.gov	J. COURTNEY	OLIVE	Bonneville Power Administration (BPA)
Tom.Elgie@powerex.com	THOMAS	ELGIE	Powerex Corporation
renewablegroup@cpuc.ca.gov	AMY	BAKER	
freesa@thirdplanetwind.com	AMY	FREES	
Andrew.Luscz@glacialenergy.com	ANDREW	LUCSCZ	
acitrin@prosoliana.com	ARI	CITRIN	
WBlatner@SempraUtilities.com	BILLY	BLATTNER	
davidmorse9@gmail.com	DAVID E.	MORSE	
dtownley@infiniacorp.com	DAVID	TOWNLEY	
elvine@lbl.gov	EDWARD	VINE	
Erin.Grizard@BloomEnergy.com	ERIN	GRIZARD	
HYao@SempraUtilities.com	HUGH	YAO	SDG&E/SoCal Gas
jpepper@svpower.com	JAN	PEPPER	
janice@strategenconsulting.com	JANICE	LIN	
kmills@cfbf.com	KAREN NORENE	MILLS	
sahm@fitcoalition.com	KENNETH SAHM	WHITE	
kristin@consciousventuresgroup.com	KRISTIN	BURFORD	
lsherman@orrick.com	LESLIE E.	SHERMAN	
moxsen@calpine.com	MARJORIE	OXSEN	
matt.miller@recurrentenergy.com	MATT	MILLER	
mpf@stateside.com	MELISSA P.	MARTIN	
michale.wheeler@recurrentenergy.com	MICHAEL	WHEELER	
nedrayoung@gmail.com	NEDRA	YOUNG	
stephaniec@greenlining.org	STEPHANIE C.	CHEN	
tam.hunt@gmail.com	TAM	HUNT	
tdarton@pilotpowergroup.com	THOMAS R.	DARTON	Clean Coalition/Community Environmental Council
ttutt@smud.org	TIMOTHY N.	TUTT	Pilot Power Group, Inc.

todd.johansen@recurrentenergy.com	TODD	JOHANSEN
legal@silveradpower.com		
regulatory@silveradpower.com		
mrw@mrwassoc.com		
artrivera@comcast.net	ART	RIVERA
CKebler@SempraGeneration.com	CURTIS	KEBLER
cynthia.brady@constellation.com	CYNTHIA A.	BRADY
cynthia.brady@constellation.com	CYNTHIA FONNER	BRADY
Derek@AltaPowerGroup.com	DEREK	DENNISTON
pstoner@lgc.org	G. PATRICK	STONER
imgowan@3degreessinc.com	IAN	MCGOWAN
Jennifer.Barnes@Navigantconsulting.com	JENNIFER	BARNES
James.Stack@CityofPaloAlto.org	JIM	STACK, PH.D.
judy.pau@dwt.com	JUDY	PAU
lmitchell@hanmor.com	LILY M.	MITCHELL
m.stout@meridianenergyusa.com	MARK	STOUT
mniroula@water.ca.gov	MOHAN	NIROULA
pblood@columbiaenergypartners.com	PETER	BLOOD
pshaw@suntechamerica.com	POLLY	SHAW
richard.chandler@bp.com	RICHARD F.	CHANDLER
r.raushenbush@comcast.net	RICHARD W.	RAUSHENBUSH
pletkarj@bv.com	RYAN	PLETKA
SEHC@pge.com	SHAUN	HALVERSON
shess@edisonmission.com	STEPHEN	HESS
thomase.hobson@ge.com	THOMAS	HOBSON
TCorr@SempraGlobal.com	THOMAS P.	CORR
tphillips@tigmaturalgas.com	TRACY	PHILLIPS
mpr-ca@coolearthsolar.com		
dwtcpucdockets@dwt.com		
Harry.Singh@RBSSempra.com	HARRY	SINGH
Karen.Kochonies@MorganStanley.com	KAREN	KOCHONIES
Morgan.Hansen@MorganStanley.com	MORGAN	HANSEN
nicole.fabri@clearenergybrokerage.com	NICHOLE FABRI	ZANDOLI
ron.cerniglia@directenergy.com	RONALD M.	CERNIGLIA
vsuravarapu@cera.com	VENKAT	SURAVARAPU
tjaffe@energybusinessconsultants.com	TODD	JAFFE
garson_knapp@fpi.com	GARSON	KNAPP
		Suntech America, Inc.
		BLACK & VEATCH
		PACIFIC GAS AND ELECTRIC COMPANY
		Cool Earth Solar
		Clear Energy Brokerage & Consulting LLC
		DIRECT ENERGY SERVICES, LLC
		CAMBRIDGE ENERGY RESEARCH ASSOCIATES

cswoollums@midamerican.com	SAMARA M.	RASSI	
jasadont@bluestarenergy.com	CATHY S.	WOOLLUMS	
abiecunasjp@bv.com	JON M.	CASADONT	
nblack@calbioenergy.com	JASON	ABIECUNAS	RENEWABLE ENERGY CONSULTANT
echiang@elementmarkets.com	ROSS	BUCKENHAM	
jpittsjr@pcgconsultants.com	ED	CHIANG	
jon.jacobs@paconsulting.com	JOHN	PITTS	
kjimonson@ems-ca.com	JONATHAN	JACOBS	
ccollins@Energystrat.com	KEVIN J.	SIMONSEN	
jenine.schenk@apses.com	CAITLIN	COLLINS LIOTIRIS	
emello@sppc.com	JENINE	SCHENK	
tdillard@sppc.com	ELENA	MELLO	
jgreco@terra-genpower.com	TREVOR	DILLARD	
Jeff.Newman@bth.ca.gov	JOE	GRECO	Terra-Gen Power, LLC
ctorchia@chadbourne.com	JEFF	NEWMAN	
ktendy@chadbourne.com	CLAIRE E.	TORCHIA	
fyanney@fulbright.com	KRYSTYN	TENDY	
	FRED G.	YANNEY	
	HARVEY M.	EDER	
igoodman@commerceenergy.com	INGER	GOODMAN	
Douglas@Idealab.com	DOUGLAS	MCPHERSON	
vjw3@pge.com	VALERIE J.	WINN	
fhall@solarelectricsolutions.com	FREEMAN S.	HALL	Solar Electric Solutions, LLC
jackmack@susec.com	JACK	MCNAMARA	
case.admin@sce.com	CASE	ADMINISTRATION	SOUTHERN CALIFORNIA EDISON COMPANY
george.wiltsee@sce.com	GEORGE	WILTSEE	
Joni.Templeton@sce.com	JONI A.	TEMPLETON	
Laura.Genao@sce.com	LAURA I.	GENAO	Southern California Edison Company
kswitzer@gswater.com	KEITH	SWITZER	
chad@cenergypower.com	CHAD	CHAHBAZI	
rgilleskie@san.rr.com	ROBERT J.	GILLESKIE	
j.miles.cox@sbcglobal.net	JEFF	COX	
ggisel@indenergysolutions.com	GEOREG	GISEL	
SNelson@Sempra.com	STEVEN C.	NELSON	
farrellytc@earthlink.net	TERRY	FARRELLY	
HRasool@SempraUtilities.com	HANNON	RASOOL	
DNiehaus@SempraUtilities.com	DESPINA	NIEHAUS	

CentralFiles@SempraUtilities.com	FILES	SAN DIEGO GAS & ELELCTRIC
fw noble@WintecEnergy.com	NOBLE	Wintec Energy, LTD
peter.pearson@bves.com	PEARSON	
csteen@bakerlaw.com	STEEN	BAKER & HOSTETLER LLP
rblee@bakerlaw.com	LEE	BAKER & HOSTETLER LLP
chestonem@sharpsec.com	CHESTONE	
john@deweygroup.com	DEWEY	
leichnitz@lumospower.com	LEICHNITZ	
hanigan@encous.com	HANIGAN	
pfmoritzburke@gmail.com	MORITZBURKE	
janet.gagnon@solarworldusa.com	GAGNON	
Jeff.Hirsch@DOE2.com	HIRSCH	
hal@rwtz.net	ROMANOWITZ	OAK CREEK ENERGY SYSTEMS, INC.
sue.mara@rtoadvisors.com	MARA	
mdjoseph@adamsbroadwell.com	JOSEPH	ADAMS BROADWELL JOSEPH & CARDOZO
paulfenn@local.org	FENN	
Dan.adler@calcef.org	ADLER	
mr Ramirez@sfwater.org	RAMIREZ	CALIFORNIA CLEAN ENERGY FUND
srovetti@sfwater.org	ROVETTI	
tburke@sfwater.org	BURKE	
norman.furuta@navy.mil	FURUTA	San Francisco Public Utilities Commission
andre.devilbiss@recurrentenergy.com	DEVILBISS	
dcover@esassoc.com	COVER	
reg@silveradopower.com	ISERN	
jim.howell@recurrentenergy.com	HOWELL	
luke.dunnington@recurrentenergy.com	DUNNINGTON	
sam.maslin@recurrentenergy.com	MASLIN	
snuller@ethree.com	PRICE	ENERGY AND ENBIRONMENTAL ECONOMICS
mcarboy@signalhill.com	CARBOY	
avege@firstwind.com	VEGE	
RegRelCPIUCases@pge.com	COORDINATION	
ELL5@pge.com	LUCHA	
MGML@pge.com	MATHAI-JACKSON	
jay2@pge.com	YAN	PACIFIC GAS AND ELECTRIC COMPANY
jsp5@pge.com	PAPPAS	
filings@a-klaw.com	TERRANOVA	Cogeneration Association of California

ldri@pge.com	LAUREN	ROHDE
MMCL@pge.com	MAGGIE	CHAN
mginsburg@orrick.com	MICHAEL P.	GINSBURG
spauker@wsgr.com	SHERIDAN J.	PAUKER
tj@a-klaw.com	TIM	LINDL
cmmw@pge.com	CORY M.	MASON
nxk2@pge.com	NIELS	KJELLUND
Eriks@ecplexus.com	ERIK	STUEBE
amartin@nextlight.com	ALEX	MARTIN
fderosa@nextlight.com	FRANK	DE ROSA
jestoddard@manatt.com	JACK	STODDARD
jwoodruff@nextlight.com	JAMES B.	WOODRUFF
jscancarelli@crowell.com	JANINE L.	SCANCARELLI
mchediak@bloomberg.net	MARK	CHEDIAK
rafi.hassan@sig.com	RAFI	HASSAN
sdhilton@stoel.com	SETH D.	HILTON
tkaushik@manatt.com	TARA S.	KAUSHIK
vidhyaprabhakaran@dwt.com	VIDHYA	PRABHAKARAN
tsolomon@winston.com	THOMAS W.	SOLOMON
bobgex@dwt.com	ROBERT B.	GEX
Diane.Fellman@nrgenergy.com	DIANE I.	FELLMAN
cem@newsdata.com	HILARY	CORRIGAN
sho@ogrady.us	STANDISH	O'GRADY
atk4@pge.com	ALYSSA T.	KOO
CPUCCases@pge.com	REGULATORY	FILE ROOM
BXSZ@pge.com	BETH	SCHOSHINSKI
GXL2@pge.com	GRACE	LIVINGSTON-NUNLEY
S2B9@pge.com	SUNCHETH	BHAT
rwalther@pacbell.net	ROBIN J.	WALTHER
ryan.heidari@endimensions.com	RYAN	HEIDARI
wetstone@alamedamp.com	BRAD	WETSTONE
beth@beth411.com	BETH	VAUGHAN
kerry.hattevik@nrgenergy.com	KERRY	HATTEVIK
	TONY	CHEN
andy.vanhorn@vhcenergy.com	ANDREW J.	VAN HORN
sean.beatty@mirant.com	SEAN P.	BEATTY
barmackm@calpine.com	MATTHEW	BARMACK

SPEAR TOWER, SUITE 3300
Pacific Gas and Electric Company

CALIFORNIA ENERGY MARKETS

ALAMEDA POWER AND TELECOM
Cool Earth Solar

JChamberlin@LSPower.com	JENNIFER	CHAMBERLIN	
phanschchen@mfofo.com	PETER W.	HANSCHEN	
timea.zentai@navigantconsulting.com	TIMEA	ZENTAI	
masont@bv.com	TIM	MASON	
dietrichlaw2@earthlink.net	WILLIAM F.	DIETRICH	
alex.kang@itron.com	ALEX	KANG	
ramonag@ebmud.com	RAMONA	GONZALEZ	
bepstein@fablaw.com	BARRY H.	EPSTEIN	
ken.alex@doj.ca.gov	KEN	ALEX	
nellie.tong@us.kema.com	NELLIE	TONG	
cpudockets@keyesandfox.com	DOCKET	COORDINATOR	
cwooten@lumenxconsulting.com	CYNTHIA	WOOTEN	
rschmidt@bartlewells.com	REED V.	SCHMIDT	
gteigen@rcmdigesters.com	GEOFF	TEIGEN	
mcmahon@solarmillennium.com	RACHEL	MCMAHON	
sgallagher@stirlingenergy.com	SEAN	GALLAGHER	
gtrobinson@lbl.gov	GERALD T.	ROBINSON	
ed.smeloff@sunpowercorp.com	ED	SMELOFF	
erasmussen@marinenergyauthority.org	ELIZABETH	RASMUSSEN	Marin Energy Authority
sara@solaralliance.org	SARA	BIRMINGHAM	
juliettea7@aol.com	JULIETTE	ANTHONY	
lynn@lmaconsulting.com	LYNN M.	ALEXANDER	
tfaust@redwoodrenewables.com	TOM	FAUST	
tim@marinemt.org	TIM	ROSENFELD	
johnspilman@netzero.net	JOHN M.	SPILMAN	
ed.mainland@sierraclub.org	EDWARD A.	MAINLAND	
keithwhite@earthlink.net	KEITH	WHITE	
wem@igc.org	BARBARA	GEORGE	Women's Energy Matters
eric.cherniss@gmail.com	ERIC	CHERNISS	
shani@scvas.org	SHANI	KLEINHAUS	
renee@gem-corp.com	RENEE H.	GUILD	
tom_victorine@sjwater.com	THOMAS J.	VICTORINE	
jrobertpayne@gmail.com	JASON	PAYNE	
davido@mid.org	DAVID	OLIVARES	
joyw@mid.org	JOY A.	WARREN	
brbarkovich@earthlink.net	BARBARA R.	BARKOVICH	Electric Resource Planning and Development Modesto Irr
dgrandy@caonsitegen.com	DOUGLAS M.	GRANDY, P.E.	BARKOVICH AND YAP INC. California Onsite Generation

FITZGERLAND, ABBOTT & BEARDSLEY, LLP

rmccann@umich.edu	RICHARD	MCCANN	
tobinjmr@sbcglobal.net	TOBIN	RICHARDSON	
saeed.farrokhpay@ferc.gov	SAEED	FARROKHPAY	
e-recipient@caiso.com			
dennis@ddecur.com	DENNIS W.	DE CUIR	CALIFORNIA ISO
rick@sierraecos.com	RICK A.	LIND	Golden State Water Company
david.oliver@navigantconsulting.com	DAVID	OLIVER	
kenneth.swain@navigantconsulting.com	KENNY	SWAIN	
cpucrulings@navigantconsulting.com	ERIN	RANSLOW	
lpark@navigantconsulting.com	LAURIE	PARK	NAVIGANT CONSULTING, INC.
pmaxwell@navigantconsulting.com	PAUL D.	MAXWELL	
tpomales@arb.ca.gov	TOM	POMALES	
amber@iepa.com	AMBER	RIESENHUBER	
tbrunello@calstrat.com	ANTHONY	BRUNELLO	
mclaughlin@braunlegal.com	BRUCE	MCLAUGHLIN	BRAUN & BLAISING P.C.
danielle@ceert.org	DANIELLE	OSBORN-MILLS	
jluckhardt@downeybrand.com	JANE E.	LUCKHARDT	
bernardo@braunlegal.com	RYAN	BERNARDO	
steveb@cwo.com	STEVE	BRINK	
steven@iepa.com	STEVEN	KELLY	California Forestry Association
Tiffany.Roberts@lao.ca.gov	TIFFANY K.	ROBERTS	INDEPENDENT ENERGY PRODUCERS ASSN
dseperas@calpine.com	DANIELLE	MATTHEWS SEPERAS	LEGISLATIVE ANALYST'S OFFICE
bsb@eslawfirm.com	BRIAN S.	BIERING	Large-Scale Solar Association
cte@eslawfirm.com	CHRISTOPHER T.	ELLISON	
jig@eslawfirm.com	JEDEDIAH J.	GIBSON	
rroth@smud.org	ROB	ROTH	Sierra Pacific Power Company
mdeange@smud.org	MICHAEL	DEANGELIS	SACRAMENTO MUNICIPAL UTILITY DISTRICT
wwood@smud.org	VIKKI	WOOD	SACRAMENTO MUNICIPAL UTILITY DISTRICT
lerry@water.ca.gov	LEE	TERRY	
hurlock@water.ca.gov	CAROL J.	HURLOCK	
varanini@sbcglobal.net	EMILIO E.	VARANINI, III	
karen@klindh.com	KAREN	LINDH	JOINT OPERATIONS CENTER
atrowbridge@daycartermurphy.com	ANN L.	TROWBRIDGE	
dsanchez@daycartermurphy.com	DIANA	SANCHEZ	
DocToxics@aol.com	JAMES L.	BYARD PH.D.	
dbranchcomb@spl-ind.com	DAVID R.	BRANCHCOMB	
c.mentzel@cleanenergymai.com	CHRISTIAN	MENTZEL	

sas@a-klaw.com	ANNIE	STANGE	
mpa@a-klaw.com	MICHAEL	ALCANTAR	
californiadockets@pacificcorp.com	CATHIE	ALLEN	
Tashiana.Wangler@PacifiCorp.com	TASHIANA	WANGLER	
dws@r-c-inc.com	DONALD	SCHOENBECK	CAC
castille@landsenergy.com	TIMOTHY	CASTILLE	
john_dunn@transcanada.com	JOHN	DUNN	Chinook Power Transmission, LLC/Zephyr Power Transm
meredith_lamey@transcanada.com	MEREDITH	LAMEY	
mark.thompson@powerex.com	MARK	THOMPSON	
AEG@cpuc.ca.gov	ANNE	GILLETTE	
CNL@cpuc.ca.gov	CHERYL	LEE	
DBP@cpuc.ca.gov	DAVID	PECK	
MWT@cpuc.ca.gov	MATTHEW	TISDALE	
SMK@cpuc.ca.gov	SARA	KAMINS	
TRH@cpuc.ca.gov	TED	HOWARD	
cleni@energy.state.ca.us	CONNIE	LENI	
lgonzalez@energy.state.ca.us	LORRAINE	GONZALES	CALIFORNIA ENERGY COMMISSION
jmcMahon@8760energy.com	JAMES	MCPMAHON	California Department of Water Resources
ab1@cpuc.ca.gov	Amy C.	Baker	ENERGY DIVISION
as2@cpuc.ca.gov	Andrew	Schwartz	EXECUTIVE DIVISION
aes@cpuc.ca.gov	Anne E.	Simon	DIVISION OF ADMINISTRATIVE LAW JUDGE
bwm@cpuc.ca.gov	Burton	Mattson	DIVISION OF ADMINISTRATIVE LAW JUDGE
cjm@cpuc.ca.gov	Candace	Morey	LEGAL DIVISION
clu@cpuc.ca.gov	Chloe	Lukins	ELECTRICITY PLANNING & POLICY BRANC
ctd@cpuc.ca.gov	Christopher	Danforth	ELECTRICITY PRICING AND CUSTOMER P
dot@cpuc.ca.gov	Dorothy	Duda	DIVISION OF ADMINISTRATIVE LAW JUDGE
gtd@cpuc.ca.gov	Gretchen T.	Dumas	LEGAL DIVISION
jm3@cpuc.ca.gov	Jaclyn	Marks	ENERGY DIVISION
js@cpuc.ca.gov	Jason	Simon	ENERGY DIVISION
jzr@cpuc.ca.gov	Jonathan J.	Reiger	LEGAL DIVISION
jp6@cpuc.ca.gov	Jordan	Parrillo	ELECTRICITY PLANNING & POLICY BRANC
jaa@cpuc.ca.gov	Joseph A.	Abhulimen	ELECTRICITY PLANNING & POLICY BRANC
je3@cpuc.ca.gov	Josephine	Emelo	ELECTRICITY PRICING AND CUSTOMER P
jf2@cpuc.ca.gov	Julie A.	Fitch	ENERGY DIVISION
jmh@cpuc.ca.gov	Julie	Halligan	CONSUMER PROTECTION AND SAFETY D
kar@cpuc.ca.gov	Karin M.	Hieta	ELECTRICITY PRICING AND CUSTOMER P
kho@cpuc.ca.gov	Ke Hao	Ouyang	ELECTRICITY PRICING AND CUSTOMER P

kwh@cpuc.ca.gov	Keith D	White	ENERGY DIVISION
lau@cpuc.ca.gov	Laurence	Chaset	LEGAL DIVISION
mpo@cpuc.ca.gov	Marcelo	Poirier	LEGAL DIVISION
mrl@cpuc.ca.gov	Mark R.	Loy	ENERGY COST OF SERVICE & NATURAL G
mjs@cpuc.ca.gov	Mary Jo	Stueve	ELECTRICITY PLANNING & POLICY BRANC
mjd@cpuc.ca.gov	Matthew	Deal	POLICY & PLANNING DIVISION
mc3@cpuc.ca.gov	Michael	Colvin	POLICY & PLANNING DIVISION
sha@cpuc.ca.gov	Mitchell	Shapson	LEGAL DIVISION
nlr@cpuc.ca.gov	Nika	Rogers	ELECTRICITY PLANNING & POLICY BRANC
nil@cpuc.ca.gov	Nilgun	Atamturk	POLICY & PLANNING DIVISION
psd@cpuc.ca.gov	Paul	Douglas	ENERGY DIVISION
rmm@cpuc.ca.gov	Rahmon	Momoh	ELECTRICITY PLANNING & POLICY BRANC
rkn@cpuc.ca.gov	Raj	Naidu	DIVISION OF WATER AND AUDITS
svn@cpuc.ca.gov	Sean A.	Simon	ENERGY DIVISION
sc1@cpuc.ca.gov	Susannah	Churchill	ENERGY DIVISION
tbo@cpuc.ca.gov	Traci	Bone	LEGAL DIVISION
ys2@cpuc.ca.gov	Yuliya	Shmidt	ELECTRICITY PLANNING & POLICY BRANC
Will.Brieger@doj.ca.gov	WILLAIM N.	BRIEGER	California Department Of Justice
claufenb@energy.state.ca.us	CLARE LAUFENBER	GALLARDO	
cleni@energy.state.ca.us	CONSTANCE	LENI	
hrait@energy.state.ca.us	HEATHER	RAITT	MS-20
kzocchet@energy.state.ca.us	KATE	ZOCCHETTI	CALIFORNIA ENERGY COMMISSION
mpryor@energy.state.ca.us	MARC	PRYOR	
pdoughma@energy.state.ca.us	PAMELA	DOUGHMAN	
dividaver@energy.state.ca.us	DAVID	VIDAVER	TECHNOLOGY SYSTEMS DIVISION
jwoodwar@energy.state.ca.us	JIM	WOODWARD	
pbarthol@energy.state.ca.us	PANAMA	BARTHOLOMY	
hcronin@water.ca.gov	HOLLY B.	CRONIN	
rmiller@energy.state.ca.us	ROSS A.	MILLER	

MAIL TO:

Commerce Energy, Inc.
5251 Westheimer Rd., Ste. 1000
Houston, TX 77056-5414

Michael Meacham
Environmental Resource Manager
City of Chula Vista
276 Fourth Avenue
Chula Vista, CA 91910

Mountain Utilities
PO Box 1
Kirkwood, CA 95646

Samara M. Rassi
Regulatory Affairs Analyst
Fellon-Mccord & Associates
9960 Corporate Campus Dr., Suite 2500
Louisville, KY 40223

Harvey M. Eder
Public Solar Power Coalition
1218 12th Street, No. 25
Santa Monica, CA 90401

Solar Semiconductor Inc.
1292 Kifer Road, Suite 808
Sunnyvale, CA 94086

Tony Chen
Sr. Manger, Business Devel.
Cool Earth Solar
4659 Las Positas Rd., Ste. 94551
Livermore, CA 94551